



**Ministry of Education  
Knowledge Management & Accountability Division**

**2014/15 Distributed Learning Enrolment Audit**

**AUDIT REPORT**

**SCHOOL DISTRICT No. 8 KOOTENAY LAKE**

**HOMELINKS  
AND  
DISTANCE EDUCATION SCHOOL OF THE KOOTENAYS  
(DESK)**

*Revised September 2015*

# 2014/15 DISTRIBUTED LEARNING ENROLMENT AUDIT REPORT

## SCHOOL DISTRICT No. 8 (Kootenay Lake)

### **Background**

The Ministry of Education funds boards of education based on the number of student full time equivalents (FTEs) reported by the districts on [Form 1701: Student Data Collection](#) (Form 1701). The FTEs are calculated by factoring the number of qualifying courses the student takes. A funding formula is used to allocate funds to boards based primarily on the calculated student FTE.

The Ministry of Education annually conducts Distributed Learning (DL) audits, in selected school districts, to verify enrolment reported on Form 1701. School districts are selected for audit based on a variety of factors, including the length of time since their last audit, enrolment size, and changes in enrolment.

DL programs and courses are alternatives to regular classroom-based instruction for students in Kindergarten to Grade 12 providing a method of instruction that relies primarily on indirect communication between learners and B.C. certified educators, including internet, other electronic-based delivery, teleconferencing, and correspondence. DL takes place when a student is primarily at a distance from the teacher.

Since 2009/10 funding recoveries are expanded to include FTEs outside of the sample where the auditors can make a clear link between the audit findings in the sample and those FTEs outside the sample.

There are 60 centres reported as public Distributed Learning schools in the Province totalling 10,443.8470 FTEs as at February 2015 for the 2014/15 school year. The Homelinks and DESK Schools at School District No. 8 (Kootenay Lake) reported a total of 325.0000 FTEs on their October 17, 2014 enrolment and 59.7500 FTEs on their February 2015 enrolment.

### **Purpose**

The purpose of the Distributed Learning Enrolment audit is to provide assurance to the Ministry of Education and boards of education that Ministry policy, legislation and directions are being followed. The audits are based on *Form 1701: Student Data Collection, Completion Instructions for Public Schools*, current Distributed Learning Agreements, and related Ministry policies.

### **Description of the Audit Process**

A Distributed Learning audit was conducted at DESK and the Homelinks Programs in School District No. 8 (Kootenay Lake) during the week of May 19, 2015. For the purposes of the audit, the sample files for all of the programs except Homelinks-Creston were centralized into this location. The total enrolment reported at October 17, 2014 and February 13, 2015 was 384.7500 FTEs, of which 198 student files were reviewed. The review was extended to include claims for analysis when the audit team identified school-wide issues.

Entry meetings were held with the Superintendent, District staff and four of the DL Schools' Principals to review the purpose of the audit and the criteria for funding as outlined in the Form 1701 Instructions. Another entry meeting was held with the Principal at the Homelinks-Creston sites. In all meetings the process of the audit was reviewed and information about the programs offered through Distributed Learning were discussed.

The audit team worked out of the DESK Centre and for a day and a half at Homelinks-Creston. For the remainder of the week all auditors were at the DESK Centre where the files for all the schools except the Homelinks-Creston had been centralized. The auditors sought evidence to determine that the claims met the active criteria by the activation submission date and other related Ministry directives. Throughout the audit there were ongoing discussions with DL staff to ensure the audit team had an understanding of all aspects of the various programs. During the course of the week the auditors met with the teachers of the Homelinks programs, the former Vice-Principal (responsible for all of the Homelinks programs until two years ago) and talked via telephone with some parents of students in the Kindergarten to Grade 9 Homelinks programs. All recommended adjustments were discussed with the staff and Director responsible for the DL schools during the course of the audit, providing them with every opportunity to locate the necessary documentation. An extended review was undertaken at Homelinks-Slocan as the audit team identified a school wide issue.

Exit meetings were held with the DL Principals individually (Homelinks-Kaslo and Slocan via telephone), and with the Superintendent and District staff. At each exit meeting the auditors presented their preliminary results and clarified any outstanding issues.

Prior to the audit visit, the auditors undertook a verification of the school-assigned teachers' status with the Teacher Regulation Branch.

### **Description of the Program**

The Kootenay Lake School District's DL program consists of five schools in four geographical areas: Slocan, Kaslo, Creston and two in Nelson. The District stated that the majority of the students are from within the local geographical area. Homelinks-Kaslo, Homelinks-Nelson and Homelinks-Slocan enrol only Kindergarten to Grade 9 students. Homelinks-Creston enrolls Kindergarten to Grade 12 students and DESK enrolls students in Grades 4 to 12 including non-graduated and graduated adults. Homelinks-Slocan was created three years ago to enable families outside the Nelson area to have local access to a DL program. The Homelinks programs are all located within elementary schools with administrative support provided by the Principals of each of those elementary schools. Up until two years ago the Vice-Principal of the Creston elementary school provided administrative support for the Homelinks programs in both Slocan and Kaslo. DESK has an on-site Vice-Principal with off-site support from the Principal of L.V. Rogers Secondary School. There have been administrative changes mid-year in two of the locations and the teachers in the Homelinks-Kaslo and Homelinks-Slocan programs are new to the DL program this year. The Homelinks-Kaslo and Homelinks-Slocan programs are small and have attempted to attract participation of those students who would otherwise be home schooled. Homelinks-Creston has seen an increase in enrolment as a result of independent school closures in an adjacent community. All Homelinks programs are generally paper-based. The programs all have a face-to face component with students required to come into the school for activities once a week. As the programs are small and many families have more than one child, enrolled

teachers have the ability to communicate regularly face-to face during the weekly activities.

DESK is well established and provides courses to local Grade 10 to 12 students, some of whom are cross-enrolled. Grade 4 to Grade 9 students from DESK were not part of the audit sample. DESK students are not permitted to take more than one course at a time until they have shown substantial progress in the first course. Most courses use the Moodle platform as a delivery model.

## **Observations**

The auditors found that:

- All members of the teaching staff of the School District Kootenay Lake School distributed learning programs are currently certified with the Teacher Regulation Branch.
- The teachers lead the educational programs of their students in varying degrees in four of the Homelinks locations. The audit outcomes for all the Homelinks programs were based on evidence and clarification conversations the audit team had with the principals, teachers and some parents.
  - At Homelinks-Slocan it was verified that the teachers did not lead the educational program, nor evaluate or assess their students on an on-going basis. Teachers, the administrator and parents concurred that they viewed the program as homeschooling with teacher support. The parents led the consultation with the teacher and determined the Student Learning Plan (SLP). Parents made the decision as to which resources they wanted to use and determined how to assess and evaluate their children. In some instances the SLPs were not completed for all the required areas of study in the relevant educational programs, nor did the SLP refer to Ministry prescribed learning outcomes, or indicate a plan for the provision of learning activities and assessment strategies. Based on the assessments and evaluations of parents, the teacher took that work and created a progress report card. The teacher took direction from the parents as to how the activity time each week would be spent. At the parents' request teachers provided instruction in French and were participants in field trips and fine arts activities over the school year. It was verified that the teachers did not provide any direct instruction beyond basic French, or student assessment.
  - Findings at Homelinks-Slocan verified that far less time, if any, was spent by teachers engaging the parents in discussions about the learning outcomes for students in each subject, there were no records of the teachers' own assessment and evaluation of students, and parents were given control in the choice of learning resources they wished to use. It was verified that many of these resources were clearly designed for homeschooling.
  - The Homelinks-Slocan program appeared to be completely unfamiliar with the responsibility and role DL teachers must undertake for the delivery of the curriculum, and the assessment and evaluation of student work. The absence of a District policy regarding the roles and responsibilities of teachers and parents enrolled in a DL program, and a policy on appropriate expenditure of the third-party provision payments (capped at \$600) was an additional obstacle.
  - Homelinks-Creston was identified as a program aligning with Ministry directives.
  - Homelinks-Nelson had an experienced teacher who has been with the program for some time. Although not meeting all the directives specific to teacher-led programming, the SLP's reflected teacher direction and the choice of resources were aligned with Ministry recommended resources. Evidence was also provided of teacher assessments, evaluations

- and an indication that the roles of parents and teachers were defined.
- Similar findings were verified at Homelinks-Kaslo. There was evidence of a teacher-led SLP and the teachers in both Homelinks-Kaslo and Homelinks-Nelson did make an attempt to relate student work to the Ministry prescribed learning outcomes and tracked students to ensure learning outcomes were being covered. They also made an attempt to ensure the parents had some understanding of what the learning outcomes meant in relation to student learning. While the findings were minimal, these teachers did engage in direct student assessment and evaluation.
  - It was verified that neither the Homelinks-Nelson or Homelinks-Kaslo programs were fully aligned with Ministry directives with strong indications that many of the parents were of the belief they were homeschooling their children. In this instance only no recoveries were recommended as the auditors found evidence of some teacher direction, assessment and evaluation.
- No evidence was found of a District-wide statement or policy regarding the clear delineation of parent and teacher roles for the delivery of DL programs in the District.
  - Regarding the [Distributed Learning-General Policy](#)'s financial reimbursements to third party providers, the auditors did note there was considerable variation between the DL programs in terms of what was approved as an acceptable expense. While there appeared to be a common process for approval of third-party expenditures, what was approved varied greatly and in some instances there were questionable expenses with little relationship to the SLPs such as allocations to Oak Meadows which is a home schooling program. There was little evidence that teachers worked with third party service providers to ensure they were aware of the relevant learning outcomes to be addressed as related to the individual SLP.
  - The substantive student course activity, at the Grade 10-12 levels, met the five percent requirement of the learning activities in each course.
  - The Grade 10 to 12 course completion rate appeared to be above the norm based on the sample of files examined.
  - The Schools follow the [Distributed Learning-BC Residency Policy](#).
  - The Schools follow the District's policy and procedures verifying 'ordinarily' resident in B.C.
  - There were instances where Schools reported claims without evidence aligned with the [Distributed Learning Active Policy](#) for Kindergarten to Grade 9 students which says "*The Ministry will only fund boards of education for students taking distributed learning when specific criteria related to active participation are met. To receive funding, boards of education report to the Ministry when students become active participants in distributed learning. School files for full-time Grade K-9 students must contain dated evidence that a student is active on or before the dates listed in the 1701 Instructions. The minimum evidence is a teacher- developed learning plan and a documented commitment from a parent. Additionally, there must be evidence of the student's active participation three weeks following that date.*" In addition to the lack of accuracy around teacher-developed learning plans and commitment from parents, there was no evidence of student work in the program.
  - Some students were undertaking fewer courses than claimed.
  - DESK program staff advised the audit team that some students had been inadvertently claimed for funding who had not completed substantive student course activity. Due to staffing changes and issues in Moodle, student claims were reported for funding before meeting the DL Active requirement that says: "*For each eligible course reported for funding, substantive student course activity is submitted to the teacher. This course activity directly*

*links to the curriculum outcomes required in each course. Evidence includes activity demonstrating that a minimum of five per cent of each course's learning activities have been covered."*

- Aboriginal Education claims were difficult to verify in all sites with the exception of Homelinks-Creston. There was no mechanism in place demonstrating evidence of Aboriginal Education Programs and/or Supports provided to the individual students reported for this supplemental funding. Limited evidence was eventually provided for the students claimed. The auditors accepted as evidence jotted notes on disparate pieces of paper, notes in daybooks randomly entered, or through recollection of verbal conversations with parents. Many of the services were delivered by third party providers.

### **Audit Sample Findings**

The auditors found that:

- 2.0000 K-9 FTEs claimed in October were not active in the program. There was no evidence the students were active at the activation date as required by the Distributed Learning - Active Policy and in accordance with Form 1701 Instructions.
- 6.0000 FTEs K-9 were funded for a program when it was verified that program was not developed, led, assessed or evaluated by a BC certified teacher contrary to the Distributed Learning Active Policy which says that: "*Certified teachers lead distributed learning programs, verifiable by evidence such as course or student timetables, course selection forms, registration reports, or information gathered from records and through interviews with teachers and other staff.*" and in accordance with [posted DL requirements](#): "*DL program is directed and supervised by a British Columbia-certified teacher (parents may assist in facilitating the learning process, but are not the teachers)*".
- 0.6250 FTEs (consisting of 0.2500 Grade 10 to 12 school-age and 0.3750 graduated adults) reported in October had no evidence of substantive student course activity meeting the DL Active Policy requirements.
- 0.1250 graduated adult FTEs reported in February had no evidence of substantive student course activity meeting the DL Active Policy requirements.
- 0.5000 FTEs (consisting of 0.2500 Grade 10 to 12 school-age and 0.2500 non graduated adults) reported in October were enrolled in fewer courses than claimed.

### **Recommendations**

The auditors recommend that:

- The District ensure students are claimed only for courses in which they are enrolled and have become active in accordance with the Form 1701 Instructions and the Distributed Learning Funding and Active Policies.
- The District report for funding only claims for those students who are active in accordance with the Form 1701 Instructions, and the Distributed Learning Funding and Active Policies.
- The Schools must ensure that all student claims for Aboriginal Education supplement funding meet all the criteria in the Form 1701 reporting requirements and in accordance with the K-12 Funding-Aboriginal Education Policy including documented evidence the Ministry funded services and supports must be monitored by a BC certified teacher.
- The District ensure that the Aboriginal Education staff who provide service to students claimed for Supplementary Aboriginal Education Services develop a means of dating and

documented evidence of what programs and/or support services are provided to individual students as identified in the Form 1701 Instructions which says:

*For a student to be reported as receiving an Aboriginal Education Program and/or Services, all of the following must be met:*

- 1. evidence that the student has self-identified as being of Aboriginal Ancestry (First Nations, status and non-status, Métis, and Inuit);*
  - 2. evidence that the parent or guardian of the student has been consulted;*
  - 3. evidence that the Aboriginal Education Programs and Services have involved the Aboriginal communities in planning and delivery;*
  - 4. evidence that the Aboriginal Education Program is in addition to any other programs and services to which the student is eligible;*
  - 5. evidence that the Aboriginal Education Programs and services provide a continuum of substantive learning experiences and/or support services throughout the school year.*
- The District must immediately align all their Kindergarten to Grade 9 DL programs ensuring funding claims and service to students is undertaken in accordance with the [School Act](#), Ministry's [School Regulation](#), [K-12 Funding Policy](#), the District's [DL Agreement](#) and [Standards](#), as well as all related DL Policies including DL Active. Student claims for full program and course funding must meet the related directives specific to the duties of a teacher in a funded educational program. Should the decision to operate a selection of DL Centres as Home School educational opportunities, then the reporting of claims must align with the Form 1701 Instructions for Home Schoolers (P.6).
  - The District must develop guidelines regarding the clear delineation of the roles and responsibilities of teachers and parents.
  - A consistent District policy/document must be developed for all DL Centres regarding the acceptable use of third party providers that aligns with the [DL General Policy](#) which says: *If the board of education uses a third party to provide educational services or learning support, materials, or resources to learners, the board must do the following:*
    - *ensure that the educational services, materials, and resources are part of the educational program supervised by a board employee who is certified by the Teacher Regulation Branch*
    - *pay only the third party directly and not the parent, learner or any other person*
    - *ensure that parents and third party service providers clearly understand their roles and responsibilities for student safety and security*
    - *clearly describe its responsibility to provide the program outlined in a student's learning plan or Individual Education Plan separately from additional services the student may receive from the service provider.*

*If the board of education uses a third party to provide educational services or learning support, materials, or resources to learners, the board must do the following:*

- *Pay up to a maximum of \$600 per FTE in grades K-12 for reimbursements to third party resources and service providers.*
- *NOTE: the amount of the operating grant to be used for third party resourcing would not apply to:*
  - *supporting students with special needs in levels 1, 2 and 3; and categories K,P,Q,R, in achieving the goals in their Individual Education Plans;*
  - *career technical centre program courses;*
  - *post-secondary transition program courses and;*

- *a portion of Internet access costs if required to participate in a DL program or course.*
- DL schools claim only those K-9 students when an educational program is provided that aligns with Ministry directives and in accordance with the Distributed Learning Active Policy and Form 1701 reporting instructions.
- Based on the observations and recommendations of this report the Ministry schedule a return audit of the District's DL Programs.

### **Auditors' Comments**

The auditors wish to express their appreciation to the District staff for their cooperation during the audit.