



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

2014/15 Distributed Learning Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No.36 (Surrey)

SURREY CONNECT ELEMENTARY AND SECONDARY

2014/15 DISTRIBUTED LEARNING ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 36 (Surrey)

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 Surrey Connect Elementary and Secondary Schools at School District No. 36 (Surrey) reported a total of 323.2500 FTEs on their October 17, 2014 enrolment and 177.0000 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 the Surrey Connect School in School District No. 36 (Surrey) during the week of April 20, 2015. The total enrolment reported at October 17, 2014 and February 13, 2015 was 500.2500 FTEs, of which 330 student files were reviewed. Entry meetings were held with the Superintendent and his staff, and with the Principal and Vice-Principals of the Surrey Connect to review the purpose of the audit and the criteria for funding as

outlined in the Form 1701 Instructions. The process of the audit was reviewed and the information provided in advance by the Principal about the procedures and processes followed by the School was discussed. The administrators and the audit team discussed the steps which the auditors would take to ensure effective communication between the auditors and the School's administrative team

The audit team worked out of the two offices provided within the District's administrative offices. A set of computers were provided to allow auditors access to the Schools' electronic database and paper files for each student included in the sample. Throughout the audit there were ongoing discussions with DL staff to ensure that the audit team had an understanding of all aspects of the programs. The auditors sought documentation to determine that the claims met the active criteria by the activation submission date and other related Ministry directives. All recommended adjustments were discussed with the administrative staff during the course of the audit, providing them with every opportunity to locate the necessary documentation.

Exit meetings were held with the DL Principal and the Superintendent. 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 School's administration and the staff who teach all of the Grade 10-12 courses are located within the School District administrative office. Spaces are available within this facility to conduct fact-to-face sessions with students and to provide students with the opportunity to pursue their work with access to on-site teachers and District computer stations. Testing stations are also available to enable students to take examinations in a supervised environment. The majority of the school-age students are cross-enrolled with the District's secondary schools. The remaining students are enrolled in Surrey Connect as their school of record. The emphasis of the courses available to students are Grade 10-12 academic courses which lead to graduation. The K-9 component of the School is located in a nearby District facility. One of the School's two Vice-Principals administers this program. The K-9 program operates on a blended instruction model combining education at a distance with students being present twice per week for group instruction, 'workshops' based on curriculum topics, and group activities. Parents are encouraged to take part in these school-based activities. In addition to the basic instructional program, the K-9 program offers the services of a Learning Support Team and counselling, as well as Aboriginal Education and English Language Learning support.

Observations

The auditors found that:

- The K-9 component of Surrey Connect provides instruction to students who are temporarily resident outside of B.C. The School follows a practice where the parent or guardian meet annually with school staff and is required to complete a form which states the reason for travel and the expected date of return to B.C. The School stated the practice is limited to two

years for the length of time it will provide education to students temporarily outside of B.C. There was no evidence to verify that three students claimed for funding along with their parent/guardian had met the School's practice of consideration for ordinarily resident in B.C. within the stated two year limit. To align with the Ministry directives for funding eligibility, the [K-12 Funding-General Policy](#) states that: *To be eligible for provincial funding, Boards of Education must ensure that students are: ordinarily resident in BC (and where applicable) with their parent/legal guardian enrolled in the district.*

- The District has policies which were developed to confirm addresses of students and to determine residency within school catchment areas, but does not have a District-wide B.C. residency policy and/or procedures aligned with the [DL BC Resident Policy](#) which says: "A board must have a policy for determining "ordinarily resident" status. The [Eligibility of Students for Operating Grant Funding Policy](#) provides guidance to boards regarding ordinarily resident status. In deeming a student "ordinarily resident" there is no specific time limit set by the Ministry, such as two years, but time may be a factor in the board's policy. A board may consider various kinds of evidence from the student, parent, or legal guardian, to determine if they are ordinarily resident in B.C. Evidence used to establish residency must be kept in the school or student's file and be readily available." These determinates for students who are considered temporarily out-of-province but still B.C. residents along with their parent/guardian, must also align with the overarching [Eligibility of Students for Operating Grant Funding Policy](#) and the K-12 Funding-General Policy.

While Surrey Connect has a practice designed to address this requirement, there currently is no District framework to develop practices that align with the District process, nor the ability to verify students along with their parents are ordinarily resident in B.C. and therefore entitled to a publically funded education.

- The School does not follow the Form 1701 Instructions for reporting some Grade 10 to 12 claims for funding within the timelines specified. The School's practice is to receive the student registration form and the Substantive Assignment (substantive student course activity) submitted by the student. The teacher marks the assignment, communicates with the student and enters the mark in a gradebook. The completion of this process is entered in School records as the date upon which the student becomes 'active'. The task of ensuring that all other eligibility requirements are met (including verification of residency) is the responsibility of the administrative staff before a claim is reported. This verification process can delay the claim far beyond the Form 1701 reporting timeline, causing the claim to be reported in a subsequent reporting period, sometimes several months after the students has been deemed 'active'.
- The following existing District DL related policies are not consistent with the current Ministry related requirements.
 - Home School Learners (Policy 8911.1) dated 1991 – refers to home schoolers not distributed learning.
 - Distance Education (Policy 8910) dated 2004 – refers to Distance Education and is not consistent with current Ministry DL Policies or Standards.
 - The District's policy on reimbursements to third party service providers is not consistent with the Ministry's current maximum of \$600.00 per student per year. The School's policy is consistent with the provincial maximum.
- Form 1701 Funding claims were reported for some student claims where there was no

evidence of substantive student course activity contrary to the [DL Active Policy](#) which states that: *“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...materials must include a sample of substantive student course activity for the course reported for funding and a copy of the teacher’s observations, feedback and marking details for the activity.”*

- One student was claimed for re-registration in a course claimed during the previous DL funding period, contrary to the [DL Funding Policy](#) which states that: *“For boards to be eligible for funding for the same DL course taken in the same DL school by Grade 10-12 students (including adults) the following conditions must be met:*
 - *The student must have been previously reported as failed (through course completion), or as course completed and wanting to improve their mark, or withdrawn from that course.*
 - *If a student has withdrawn from a course or did not complete a course, there must be a record of student inactivity for two DL enrolment counts, with a corresponding record of attempts made by the DL school to contact the student for that course.”*
- 13 of the 16 student claims reported for supplementary Aboriginal Education Programs and/or Services had no documented evidence to verify that there was any additional service and/or support. In accordance with the Form 1701 Instructions (P 10): *“For a student to be reported as receiving an Aboriginal Education Program and/or Service **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 Aboriginal Education support staff, who would deliver these services, was not assigned until late in the school year and had little opportunity to ensure that the above criteria were met.
- There was no evidence at the District level of board governed procedures regarding awarding credit through Independent Directed Studies (IDS) in accordance with the IDS directives outlined in the [Earning Credits Policy](#) and the [Handbook of Procedures for the Graduation Program](#) (P.59-60). *Procedures for IDS: Awarding of credit through an IDS should be governed by the procedures of the board of education. IDS allows students to initiate their own learning under teacher supervision. To participate in IDS, students must demonstrate the ability to work independently. Teachers and students should develop an IDS plan that includes: A process for ongoing facilitation and assessment; Criteria for determining successful completion of the IDS; and, credit value (one, two, three or four credits) for the proposed IDS.*

No evidence was provided at the school level of processes in place for the ongoing facilitation, supervision and assessment of student progress, nor was there evidence of how successful completion of the course was determined.

- The current Surrey Connect student learning plan states that the learning plan “*has been developed by the teacher in collaboration with the parent and **the parent signs the plan.***” No signed commitment by the parent was found on these forms to align with this statement. The Distributed Learning Active Policy specific to Grades K-9 criteria requires evidence of “*a documented commitment from a parent*” to the learning plan.
- The District’s K-9 program provides all required component of an educational program for each grade level.
- All members of the teaching staff of the Surrey Connect School are currently certified with the Teacher Regulation Branch.
- The Grade 10-12 Surrey Connect program has focused its instructional program this year on the provision of the core academically oriented courses which lead to graduation.
- The teachers lead the educational programs of their students.
- The School is in accordance with the [Distributed Learning-General Policy](#) regarding financial reimbursements to third party providers.

Audit Sample Findings

The auditors found that:

- 3.0000 Kindergarten to Grade 9 FTEs claimed in October were verified as not ordinarily resident in B.C.
- 0.5000 FTEs (consisting of 0.2500 Grade 10 to 12 school-age and 0.2500 non graduated adult) reported in October were not active at the time of the claim.
- 0.2500 graduated adult FTEs reported in February were not active at the time of the claim.
- 0.1250 school-age FTE was for the continuation of the student’s learning in the same course from a prior claim period. While the submission of the course’s learning outcomes were over a number of reporting periods, it was verified only one course was undertaken and therefore eligible for only one funding claim.
- 0.3750 FTEs (consisting of 0.1250 school-age student and 0.2500 graduated adult student) were for claims that did not align with the Form 1701 reporting directives for the period claimed.
- 0.2500 non graduated adult FTEs were reported for IDS claims. These claims are ineligible for funding as IDS are not eligible for credit towards the Adult Graduation program. It was also verified that the overall process of IDS is not being met by the DL centre.
- 13 students claimed for supplementary Aboriginal Education funding had no evidence of services and/or support as required per Form 1701 Instructions (P.10).

Recommendations

The auditors recommend that:

- The District ensure their current policy and/or procedures for all schools align with the Ministry’s requirements to verify students claimed for funding are ordinarily resident in B.C. and therefore eligible for a publicly funded education. Those students who are not ordinarily resident in B.C. are not to be reported for funding.
- The School revise their enrolment process to ensure verification of student eligibility, including determination of B.C. residency, is undertaken before students: are permitted to initiate their educational choice; are determined to be active; and, are reported for funding

within the timelines specified in the Form 1701 Instructions.

- The District review its current policies governing its DL program's operations to ensure those policies are consistent with the Ministry's policies, directives and requirements.
- The District ensure that if IDS educational options are to be available to their student population, they must develop procedures for governing and enabling the awarding of credit to be granted for Independent Directed Study that aligns with the Ministry directives.
- The District refrain from offering and reporting IDS opportunities to those students undertaking the Adult Graduation program.
- The District report for funding only those claims for students who are active in accordance with the Form 1701 Instructions, and the DL Funding and Active Policies.
- The School staff ensure that student courses are claimed for the funding period during which they meet the DL Active criteria and in accordance with the reporting claim directives of the Form 1701 Instructions. In instances where the timelines are not followed, there must be documentation to verify the course was not previously claimed along with an explanation of why Form 1701 directives were not followed.
- The School staff ensure the on-going learning in a course is reported for funding once regardless of the number of reporting periods the student takes to complete the outcomes.
- The District ensure that if Aboriginal Education supplemental funding claims are made that adequate staffing and support are made available for the delivery of required services to those students.
- The required evidence, as stated in the Form 1701 Instructions (P.10), is in place for those students reported as receiving a supplemental Aboriginal Education Program and/or Service.
- The School ensure that the completion of student learning plan for all K-9 students meets the current Surrey Connect learning plan statement for the parent to sign the plan – or – ensure the DL Active Policy directive, that there is a documented commitment from a parent to the teacher-developed learning plan, is met.

Auditors' Comments

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