



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

**2014/15 Distributed Learning Enrolment Audit**

**AUDIT REPORT**

**SCHOOL DISTRICT No. 71 (Comox Valley)**

**North Island Distance Education School  
(NIDES)**

## **2014/15 DISTRIBUTED LEARNING ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 71 (Comox Valley)**

### **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 North Island Distance Education School (NIDES) at School District No. 71 (Comox Valley) reported a total of 397.3125 FTEs on their October 17, 2014 enrolment and 234.0000 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 NIDES in School District No. 71 (Comox Valley) during the week of May 11, 2015. The total enrolment reported at October 17, 2014 and February 13, 2015 was 631.3125 FTEs, of which 323 student files were reviewed.

Entry meetings were held with the Superintendent and assigned staff, and with the Distributed Learning Centre's Principal 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 were 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 a large classroom within the School and were provided with a set of computers for use in accessing the School's program database. Paper records for each student included in the audit sample were located in the work room. The auditors sought documentation to determine that the courses claimed 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 program. All recommended adjustments were discussed with the staff during the course of the audit, providing every opportunity to locate the necessary documentation. The review was extended to include all reported students for analysis when two school-wide issues were identified by the audit team.

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 Program is administered centrally from the School facility and is staffed in a partially decentralized manner. An annex to the main building houses the Kindergarten to Grade 9 teaching staff and provides space where students can be assembled for face-to-face instruction and activities. Teachers who instruct the cross-enrolled Grade 10 to 12 students are located in the School District's secondary schools, which are often the schools of record for many of these students. The teachers are also responsible for the instruction of Grade 10 to 12 students who are not cross-enrolled and for whom NIDES is the school of record. The Program assigns staff to "I-Class" groups located in Nanaimo, Qualicum Beach and Parksville. These are weekly drop-in classes which students, resident in the location of those communities, can choose to attend face-to-face instruction and planned group activities. The School provides instruction to students classified with special needs. The educational program for these students is carried out according to District-developed Individual Education Plans (IEPs).

### **Observations**

The auditors found that:

- The School has no process to verify that students along with their parent/guardian (where applicable) are ordinarily resident in B.C., other than through assumption that the school of record for all cross-enrolled students has done their due diligence to verify residency. 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"*
- The District's 2010 Ordinarily Resident Policy is out of date. It references an elapsed Ministry policy and is not in accordance with current Ministry directives with respect to its

offering distributed learning to students outside of B.C. including the directives of the [DL-BC Residency Policy](#) which says: *The Distributed Learning – BC Residency Policy states that: if a board wishes to offer distributed learning to students outside of B.C., it is required to establish its own residency policy consistent with the School Act, Ministry legislation and policy*” and the current residency determinates in the [Eligibility of Students for Operating Grant Funding Policy](#).

- 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 District’s “Administrative Procedure 7003 Work Experience”, dated February 2002, does not comply with current Ministry policy, legislative directives, Program Guide, and the Form 1701 Instructions. The Ministry’s [Elective Work Experience Courses and Workplace Safety Policy](#) states that: *“Boards of education must establish guidelines respecting the conduct, supervision, evaluation and participation of students in all school-arranged work placements. School personnel must monitor each student on a school-arranged work placement as determined by board guidelines.”*
- The following processes were not aligned with the DL Active Policy and the Form 1701 reporting requirements:
  - As part of the registration process at the School, the student completes an assignment prior to any instructional communication with a teacher and the assignment is submitted with an application for registration. The assignment is graded, often by a computer program at the Grade 10 to 12 level, and an email is generated confirming the registration and the decision is made to submit a claim for Form 1701 funding.
  - There was little or no evidence of teacher involvement in the marking of the substantive student course activity assignments in some of the FTE funding claims submitted for Grade 10 to 12 students contrary to the DL Active Policy requirements that says school files for all students in Grades 10 to 12 must contain the following: *“Substantive student course activity must be submitted by the student to the teacher. The activity must represent a minimum of five percent of the course’s learning outcomes of each course. The activity must have been evaluated by the teacher and entered in the teacher’s records on or before the date the student becomes active.”*
  - Teacher-developed student learning plans for Kindergarten to Grade 9 students claimed for FTE funding were often vague or incomplete and lacked detail about the program to be followed. These plans, with a corroboration by the parent, are the documentation of the parents’ commitment to the student learning plan. The plans often did not contain a date or documented commitment by the parent. There was limited evidence of work submitted by the student to the teacher and often the work which was provided as evidence of the student’s active participation in the program was not dated. A large

number of the Kindergarten to Grade 9 FTE claims reported in October and February did not meet the requirements of the DL Active Policy resulting in a review of claims outside the audit sample. The DL Active Policy states that: *“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.”*

Based on the above processes there was insufficient evidence that School staff had the ability to verify the requirements of the DL Active Policy were met prior to submission of claims for funding contrary to the Form 1701 reporting instructions which says *“For all students enrolled in Distributed Learning Schools, report according to the “active” policy”* and the DL Active Policy which says, *“The Ministry will only fund boards of education for students taking Distributed Learning when specific criteria related to active participation are met.*

- Parents of Kindergarten to Grade 9 students were provided with a ‘Facilitator Feedback Form’ used to assess student progress in elements of the instructional program and report to the teacher. A significant proportion of the files reviewed included this assessment information submitted by the parent to the teacher. Evidence of assessment of student work by the teacher was not available in the files as often as that submitted by the parent, 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)”*.
- During the audit significant questions arose as to whether a variety of the substantive student course activity used to substantiate Grade 10 to 12 funding claims represented a minimum of five percent of the course’s learning activities. The Principal, when questioned about the validity of these assignments, stated that he and his staff were currently developing new expanded substantive student course activities to be used to verify “active” status in the coming school year. Some of these new assignments have been developed, are available on the school’s web site, and are designed to cover ten percent of the learning outcomes of each course.
- Two newly developed courses, called “The Patch 11 and The Patch 12” are in the process of being submitted for approval as Board/Authority Authorized (BAA) courses. Yet the School is currently providing these non-authorized courses prior to completion of the BAA approval process. In the interim, to circumvent requirements, the School’s decision was to claim these undetermined educational options as Independent Directed Studies without evidence of any established guidelines to govern the granting of credit for IDS courses. FTE claims for this course (included in the audit sample) did not meet the DL Active requirement that the substantive student course activity represents a minimum of five percent of the course’s learning activities. The audit was expanded to review all student claims for these course claims.
- A course designated as “Humanities 11” was designed as an eight credit course and claimed as two 4-credit courses. The auditors found only one substantive assignment and one set of learning activities to substantiate these claims. The School’s practice is to double claim for funding and report this course on term and final reports as English 11 and Social Studies 11. The evidence provided by the School verified the ‘active’ status for one 4-credit course claim

only. In accordance with the DL Active Policy “*evidence includes activity demonstrating that a minimum of five percent of each course’s learning activities have been covered*”.. While consideration for credit recognition may have been eight credits for these students, credit recognition does not equate to funding eligibility when the substantive student course activity verifies evidence of a single 4-credit course claim.

- General evidence of the rich range of cultural and support services which are made available to the students claimed for Supplementary Aboriginal Funding was provided to the audit team.
- All members of the teaching staff of NIDES are currently certified with the Teacher Regulation Branch.
- The School is in accordance with the [Distributed Learning-General Policy](#) regarding financial reimbursements to third party providers.
- The evidence required to verify funding claims for Work Experience 12A and 12B as well as other Career Program options was very well organized and accessible, demonstrating valuable educational services are being provided to students.

### **Audit Sample Findings**

The auditors found that:

- 8.0000 Kindergarten to Grade 9 FTEs reported in October were not active in the program. There was no evidence that the students were active as required by the DL Active Policy and in accordance with Form 1701 Instructions.
- 5.0000 Kindergarten to Grade 9 FTEs reported in February were not active in the program. There was no evidence that the students were active as required by the DL Active Policy and in accordance with Form 1701 Instructions.
- 0.1250 non-graduated adult FTE reported in October did not meet the requirements of the DL Active Policy and in accordance with Form 1701 Instructions.
- 0.1250 non-graduated adult FTE reported in February did not meet the requirements of the DL Active Policy and in accordance with Form 1701 Instructions.
- 0.5000 FTEs (consisting of 0.2500 Grade 10-12 school-age, 0.1250 non-graduated and 0.1250 graduated adults) were reported in February 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.*”

While these course have an open-ended timeline they encompass only one organized set of learning outcomes. The completion of the course’s learning outcomes may be over a number of registration periods, only one course is undertaken and therefor eligible for only one funding claim.

- 0.3750 FTEs (consisting of 0.2500 Grade 10-12 school-age and 0.1250 non-graduated adults) reported in October did not meet the criteria for Work Experience. A work component was undertaken prior to registration in the school. There was no verifiable documentation or evidence reflecting the required directives of the [Elective Work Experience Courses and](#)

[Workplace Safety Policy](#), the [Work Experience Order M237/11](#), or the [Program Guide for Ministry-Authorized Work Experience Courses](#). It was verified that the course claim was based on past employment for an educational session not provided or aligned with Ministry directives. Per the WEX Policy and WEX Program Guide *“in order to be reported as a Ministry-authorized work experience course, the work experience must be supported and monitored by the school and consist of authentic workplace experiences. Students participating in paid work experience must still meet all work experience standards and learning outcomes contained in this program guide. Paid hours to be used for work experience may only begin after the school has contacted the employer and a training plan has been developed. These courses are not intended as ‘instant credits’ for students who have a part-time job”*. While credit recognition could be considered for the student based on past employment, an educational session aligned with related Ministry directives was not provided. Credit granting does not equate to funding eligibility.

- 0.1250 Grade 10-12 school-age FTE reported in February did not meet the criteria for a funded Work Experience course. It was verified that as with the ineligible claims for Work experience identified in October, there was no evidence that an educational session aligned with the related Ministry directives was provided.
- 0.3750 Grade 10-12 school-age FTEs were reported in October for Humanities 11 identified as an eight credit course, consisting of combined studies in the fields of English and Social Studies. A single initial substantive assignment (reflective of the substantive student course activity requirement) together with a single course outline was presented as evidence for the equivalent of two courses. The claim for funding met the requirements of the DL Active policy for one course and not for the two courses claimed.
- 0.1250 Grade 10-12 school-age FTE were reported in February for Humanities 11. The evidence did not meet the requirements of the DL Active Policy for an eight credit funding claim.
- 1.3750 school-age FTEs were claimed for funding in October for an educational option (Patch) claimed by the School to be an Independent Directed Studies (IDS) four credit course. The initial substantive student course activity submitted as active evidence did not meet the criteria of the DL Active Policy’s requirement, as the activity must represent a minimum of five percent of the course’s learning activities and the activity must be clearly linked to the learning outcomes of each course. The activity is not to be based on the required process to create an IDS educational option.
- 3.2500 school-age FTEs were claimed for funding in February for an educational option (Patch) claimed by the School to be an Independent Directed Studies (IDS) four credit course. The initial substantive student course activity submitted as active evidence did not meet the criteria of the DL Active Policy’s requirement as the activity must represent a minimum of five percent of the course’s learning activities and the activity must be clearly linked to the learning outcomes of each course. The activity is not to be based on the required process to create an IDS educational option.

## **Recommendations**

The auditors recommend that:

- The District ensure that the School immediately implement a written policy and/or consistent processes to ensure that all students are ordinarily resident in B.C. prior to registration of the student and submission of related funding claims.

- The District review and update its Ordinarily Resident Policy to ensure that it is aligned with the current Ministry directives including the DL-BC Residency Policy.
- If Independent Directed Study (IDS) educational options are to be offered to eligible students, the District must establish guidelines which govern the procedures by which credit through an IDS can be granted and ensure all staff are aware of the responsibilities and directives to provide this type of learning opportunity. Including directives of the [IDS Policy](#) and in accordance with the [Handbook of Procedures for the Graduation Program](#) including the following: IDS is based on the learning outcomes of a Ministry developed or BAA Grade 10-12 course; is only for elective credit; is ineligible as a credited option for students undertaking the Adult Graduation Program (without credit towards graduation option is ineligible for funding); teacher and student develop the learning plan with a process for ongoing facilitation and assessment and criteria for determining successful completion; credit value has been assigned (based on the Board governed procedures regarding awarding credit), and Principal has approved courses arranged between teachers and students in addition to the IDS plan. Those IDS options reported through the DL educational mode must adhere to the DL Active Policy and Form 1701 reporting instructions including evidence of the minimum of five percent of the course's learning activities, and not representative of the process used to create an IDS option.
- The District review its current 'Administrative Procedure 7003 – Work Experience (2002)' policy to align with the Ministry related directives.
- The District and DL staff ensure that no funding claims are submitted for students who have not met the requirements of the DL Active Policy.
- The District ensure that the School implements a process to effectively track student claims from the time of registration until they are reported to verify claims are eligible for funding in accordance with the Form 1701 Instructions and related Distributed Learning Policies.
- The District ensure all DL staff are aware of the DL active requirement specific to substantive student course activity including ensuring the activity represents a minimum of five percent of the course's learning activities; activity must be clearly linked to the learning outcomes of each course; activity must be evaluated by the teacher; and, entered in the teacher's records, dated on or before the student met the active criteria for each Grade 10 to 12 course to be reported for funding.
- The District amend the DL school's current process of computer generated marking of substantive student course activity. The teacher must be directly involved in leading the DL courses and communicating with the student. As identified in the DL Active Policy evidence is required that the substantive student course activity is submitted to the teacher; the gradebook or other tracking system contain a dated record of the teacher's evaluation of the student's performance on the course activities; and, a sample of the substantive student course activity for the courses reported for funding and a copy of teacher's observations, feedback and marking details for the activity are readily available.
- The District amend the DL School's practice regarding Kindergarten to Grade 9 DL active procedures to ensure there is evidence onsite of a student learning plan on record, signed and dated by the teacher and parent (and the student, if old enough to understand the plan) which refers to learning outcomes for the program, required areas of student for the program, the teacher's plan for providing learning activities, learning resources being used to complete the program, as well as assessment strategies and standards of performance expected of the student. Additionally, the teacher-developed learning plan and a documented commitment from a parent along with evidence of the student's active participation three weeks following

the reporting date must be contained as dated evidence in the School's files.

- The District review the role of the teachers in the Kindergarten to Grade 9 program and ensure adherence to the requirement that certified teachers lead distributed learning programs. The DL Active Policy requires evidence components to verify that certified teachers lead DL programs including course or student timetables, course selection forms, registration reports, or information gathered from records and through interviews with teachers and other staff.
- The District ensure that all newly developed educational options including The Patch 11 and The Patch 12 have obtained prior approval through either the BAA process or through procedures required to assign IDS credit before any school offers these as courses and are reported for funding.
- The District ensure that no course with blended options or extended credit recognition are claimed exceeding the one full credit option aligned with Form 1701 reporting instructions. While the course's outcomes may reflect additional credit recognition for the students, only one educational option was provided with credit recognition not equated to funding eligibility.
- The District ensure that all schools offering Work Experience options are aware of the requirements of these Ministry authorized courses including implementation and adherence to Board established guidelines regarding conduct, supervision, evaluation and participation of eligible students. Staff must align their procedures and practices ensuring recognition of eligible work placements, awareness and adherence to the various standards for authentic work experience, use of paid work experience, monitoring students on their work study program, and assessing and evaluating students.
- 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 NIDES staff be encouraged to be regular participants in the Ministry's monthly DL Administrators collaboration sessions in an effort to ensure Ministry DL requirements are understood and met.
- The NIDES program be scheduled for a return audit to determine that the above findings have been amended to reflect only eligible claims aligned with Ministry directives and in accordance with the DL Active Policy.

## **Auditors' Comments**

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