



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

2014/15 Distributed Learning Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 82 (Coast Mountains)

**North Coast Distance Education School
(NCDES)**

2014/15 DISTRIBUTED LEARNING ENROLMENT AUDIT REPORT

SCHOOL DISTRICT No. 82 (Coast Mountains)

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 Coast Distance Education School (NCDES) at School District No. 82 Coast Mountain reported a total of 77.1250 FTEs on their October 17, 2014 enrolment and 45.25 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 NCDES during the week of May 4, 2015. The total enrolment reported at October 17, 2014 and February 13, 2015 was 122.3750 FTEs, of which 349 student files were reviewed.

An entry meeting was held with the Superintendent and the DL 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 information about the program offered by the Distributed Learning Department was provided. The administrators and the audit team discussed the procedures that would be followed to undertake the audit.

The audit team worked out of the NCDES at 3211 Kenney Street in Terrace, B.C. 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 members had an understanding of all aspects of the program. All recommended adjustments were discussed with the 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 staff at the school site, and the Superintendent and District staff at the School Board office. 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

NCDES is the DL program in School District No.82 Coast Mountains and serves the students within the District as well as other students throughout the Province. The School staff advised that approximately 80% of their students are from their own District. The School has been a K-12 school since it opened in 1989 with a decision made to no longer offer a Kindergarten to Grade 9 program at the conclusion of the 2014/15 school year. The Grade 10 to 12 program is being relocated to amalgamate with a new Trades School (Northwest Regional Trades and Careers Centre) scheduled to open in September 2015. The current DL Principal will become the Vice-Principal of the DL program and the Trades School Principal will assume responsibility for the role of Principal for DL. The DL program will continue their work with all students as well as offering "blended" learning modules for the students on-site at the Trades Program.

The School has created their own Student Management System (SMS) based on the core learning materials from BC Learning Network (BCLN). Generating their own tracking process in an effort to meet the various related Ministry eligibility requirements and directives.

Teachers keep logs of contacts with students and use email, Skype, face-to-face home visits, and phone calls to communicate with students and parents.

Observations

The auditors found that:

- All members of the teaching staff of the NCDES are currently certified with the Teacher Regulation Branch.
- The teachers lead the educational programs of their students.
- The teachers communicate with students in a variety of ways to support their learning.
- The teachers evaluate and assess their students on an on-going basis and for all progress reports and interim reports.

- The School is in accordance with the [Distributed Learning-General Policy](#) regarding financial reimbursements to third party providers.
- Even though substantive student course activity was evident in the student files, it was repeatedly not dated and without evidence to indicate the student work was active on or before the Form 1701 reporting dates – contrary to the [DL Active Policy](#) requirements which says: *“To receive funding, boards of education report to the Ministry when students become active participants in distributed learning. The active date for a student in a course or program is the earliest date, supportable with evidence, which satisfies the policy criteria”*. As evidence, the substantive student course activity must be dated to verify the criteria has been met and aligns with the Form 1701 data collection period’s reporting timeline.
- There were multiple instances of student assessment occurring (weeks or more) after the student submitted the assignment – contrary to the DL Active Policy directive that says *“the activity must have been evaluated by the teacher and entered in the teacher’s records, dated on or before the date the student became active”*.
- Many of the substantive student course activity did not consistently meet the requirement to represent a minimum of five percent of the course’s learning activities – contrary to the DL Active Policy requirements which says: *“The activity must represent a minimum of five percent of the course’s learning activities”*.
- Contrary to the DL Active Policy, substantive student course activity did not consistently link to the learning outcomes of the course and contained DL “orientation” evidence of the training required by the School for on-line learning. As this is not indicative of the learning outcomes of the course, it cannot be used as the criteria for substantive student course activity. The policy directive is very clear that the *“activity must be clearly linked to the learning outcomes of each course”* and not representative of operational training to function in a DL environment.
- The DL school does not always use the DL Active Policy language to define their practice (e.g. referencing an active assignment versus the required series of work represented by the substantive student course activity).
- While the District observed some common practices for establishing ordinarily residency in B.C., the evidence of passports and birth certificates do not indicate B.C. residency aligned with the requirement that Districts must verify students (along with their parents/guardian where applicable) are residents of the Province and these verification processes are aligned with the directives in the [K-12 Funding Policy](#) and the [Eligibility of Students for Operating Grant Funding Policy](#).
- The District observed a common practice for establishing ordinarily resident for students who were new to the District, however lacked a written policy, procedure or governance. This requirement was rectified during the course of the audit.
- Student substantive assignments were frequently unavailable, without date, or incorrectly dated.
- Course selection forms were not always available for the Grade 10 to 12 school-age students and for the non-graduated adult students – contrary to the DL Active Policy directives which says that school files for all students in Grades 10-12 (including all adult students) must contain *“evidence of a current course selection or enrolment form, dated and signed by the student or parent or both. These forms must list each eligible course that is reported for funding. For adults who have not yet graduated, these courses must lead to graduation. The forms must be on site, or documentation must be readily available to verify that the school of record maintains the course selection or enrolment form”*.

- In an instance when a student course claim indicated a withdrawal from a course and re-registered for that course even though two enrolment counts had not gone by when the second claim was made. The [DL Funding General Policy](#) states: *“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: 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.*
- The District chose to deliver the Graduation Transitions through the DL program yet did not have a process in place to ensure each student claim met the DL Active policy requirements to be eligible for funding.
- Several instances were found where adult students self declared that they were/were not a school graduate, but their self-declaration was verified as incorrect. The School did not have a process to verify adult graduation status. This lack of process indicates the District is evading their responsibility to ensure the FTEs claimed for funding are in accordance with the Ministry’s various eligibility requirements for adult students.
- There were numerous instances of students not being claimed in the funding period in which they became active.

Audit Sample Findings

The auditors found that:

- 0.6250 FTEs (consisting of 0.3750 Grade 10-12 school-age, 0.1250 non graduated adults and 0.1250 graduated adults) reported in October were enrolled in fewer courses than claimed.
- 1.8750 FTEs (consisting of 1.7500 Grade 10-12 school-age and 0.1250 non graduated adults) reported in October did not have evidence of substantive student course activity as required per the DL Active Policy and Form 1701 reporting instructions.
- 1.1250 FTEs (consisting of 0.8750 Grade 10-12 school age and 0.2500 non graduated adults) reported in February did not have evidence of substantive student course activity as required per the DL Active Policy and Form 1701 reporting instructions.
- 0.2500 graduated adult FTEs were reported in February for courses not on the list of Ministry offered tuition free courses.
- 0.1250 graduated adult FTEs reported in October was verified as a reported in a previous claim period.

Recommendations

The auditors recommend that:

- The District’s DL staff review in detail the above non-compliant operational aspects of DL Active identified during the compliance audit at NCDES and take immediate steps to align their processes in accordance with their DL Agreement, DL Standards and related DL 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 District implement a process to effectively track student claims from the time of registration until they are reported to ensure the claims are eligible for funding in accordance with the Form 1701 Instructions and related Distributed Learning policies.

- The DL staff ensure all student files contain evidence that demonstrates the student has met all the active requirements before reporting funding claims, including evidence to support the substantive student course activity.
- The DL staff implement practices to ensure all active requirements are identified by course and dated in accordance with the directives of the DL Active Policy.
- The DL staff ensure that student courses are claimed for the funding period during which they meet the Distributed Learning Active criteria and in accordance with the reporting claim directives from 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 District ensure that all schools enrolling adult students are aware of, and adhering to, the [Adult Funding Policy](#), including the course claim eligibility for Graduated Adults.
- The District ensure for all schools that a process is developed and in place to verify the graduation status of adult students.
- Ensure each student registered, in both Grade 10 to 12 and Adults, have completed a course selection form that aligns with the DL Active Policy directives.
- Substantive student course activity must be aligned with the DL Active policy's directives with evidence to demonstrate a minimum of five percent of each course's learning activities have been undertaken by the student and refrain from including "general orientation" activities that are not related to the actual assignments and course work for the course claimed.
- The District ensure all of their references, evidence and documentation reflects the current Ministry policy terminology.
- The District when determining which educational options are to be delivered only through the DL mode, that the District and the DL staff ensure each of these course claims meet the directives of the DL Active policy and are aligned with the Form 1701 directives to be considered eligible claims.
- As a result of the DL audit's findings specific to cross-enrolled student claims, the District be scheduled for a K-12 Enrolment in the 2015/16 school year.

While on site at the high school checking timetables as a mechanism to verify DL Graduation Transition claims, it was identified that many students had an eight block school schedule that included a "library support block" in addition to their DL Graduation Transition course. The directives for support block, from P.14 of the Form 1701 instructions, states that a support block is only eligible when non special needs, school-aged non graduated students in grades 10-12 are taking fewer than eight courses. The combined total number of support blocks and courses leading to graduation cannot exceed eight for these students. Students cross-enrolled in non-DL schools may claim one funded support block per student per school year, **as long as the other requirements are met**. Further, to be considered as an eligible support block:

- Each support block is to be considered equivalent to the 120 hours of instruction of a regular 4-credit course.
- Instructional service is provided and documented by a teacher, regular attendance is expected, and does not include independent study time, drop-in sessions, voluntary study halls, tutorial sessions or time spent on courses at another school.

Auditors' Comments

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