



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

**2014/15 Distributed Learning Enrolment Audit**

**AUDIT REPORT**

**SelfDesign Learning Community**

## 2014/15 DISTRIBUTED LEARNING ENROLMENT AUDIT REPORT

### SelfDesign Learning Community

#### **Background**

Distributed Learning (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 BC 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.

The Ministry of Education funds Independent School Authorities based on the Authorities' reported DL enrolment in September, February and May each year. Independent School Authorities report students undertaking DL programs or courses to the Ministry on [Form 1701: Student Data Collection Completion Instructions for Independent Schools](#) (Form 1701).

The Knowledge Management & Accountability Division conducts DL Enrolment audits to verify enrolment reported on Form 1701. The outcomes of these audits could result in funding implications if adjustments are recommended. Funding recoveries are expanded to include full-time equivalents (FTEs) outside the audit sample where the auditors can make a clear link between the audit findings in the sample and those FTEs outside the sample.

#### **Purpose**

The purpose of the DL Enrolment audit is to provide assurance to the Ministry of Education and Independent School Authorities that Ministry directives and policies are being followed. The audits are based on *Form 1701: Student Data Collection, Completion Instructions for Independent Schools*, current Distributed Learning requirements and standards as well as related Ministry policies.

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

A Distributed Learning audit was conducted at SelfDesign during the week of May 25, 2015. SelfDesign reported 1,833.2500 FTEs for their October 17, 2014 enrolment and 256.0000 FTE on their February 2015 enrolment. 454 student files were slated for review, however, due to the issues identified during the audit, only 354 student files were reviewed. The review was extended to include reported students for analysis as the audit team identified school-wide issues.

An entry meeting was held with the Principal and the DL Centre's staff to review the purpose of the audit and the criteria for funding as outlined in the Form 1701 Instructions. Due to the disseminated nature of the School, a number of staff members joined the meeting via Skype (including Vice Principal, the Coordinator of the SelfDesign high school program and the Program Coordinator for Compliance). In total, nine staff members from SelfDesign attended the entry meeting. The process of the audit was reviewed and information about the program was relayed to the audit team by the DL staff. The administrators and the audit team discussed the procedures that would be followed to undertake the audit.

The audit team worked out of the SelfDesign offices at 4196 West 4<sup>th</sup> Avenue in Vancouver British Columbia. 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 the 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 them with every opportunity to locate the necessary evidence.

An exit meeting was held with the Principal and DL staff, as well as those staff who joined in the meeting by Skype, where the audit team presented their preliminary results and clarified any outstanding issues.

Prior to the audit visit, the Lead Auditor undertook a verification of the school-assigned teachers' status with the Teacher Regulation Branch. It was verified that a some of the teachers were working with a "Restricted Licence" from the Teacher Regulation Branch (TRB).

### **Description of the Program**

SelfDesign is a secular Independent Distributed Learning Kindergarten to Grade 12 school. The School is fully distributed and the only premises staff work out of is on the Jericho Hill grounds at 4196 West 4<sup>th</sup> Avenue in Vancouver. SelfDesign is one of the largest Independent Distributed Learning Schools in British Columbia, serving a reported 2,500 students. They offer a no-fees structure Independent School fully funded by the Ministry of Education. 200 teacher/educators, work as contractors, serving the largest student body along with over 50 support staff, and a large group of support providers for students with unique or special needs.

The School reports their objective is to offer dynamic, adaptive learning, based on the Student Learning Plan which is the core document used to provide the educational flow for the learners academic growth as well as to "stay dynamic and relevant" to where the student is in their personal development.

The School's stated goal is to support learners, families and educators, and help them "self-author their lives" by facilitating students to study what "really matters to them". With the distributed nature of the school, communication is key to accomplishing this goal. SelfDesign uses Skype, Go to Meetings, Zoom, Google Plus, telephone, face-to-face, emails and texting to stay in contact with their students.

Another stated key school goal is to develop lifelong learners through the process of assessment. The teachers use assessment as learning to ensure students are part of the personal educational process. They also use the assessment process to help students' "self reference" their own learning and to establish "self-set standards" of development.

SelfDesign has a large number of students (reported as approximately three-quarters of the population) enrolled in their school with identified "special needs". As relayed by the School, the large support staff, teachers and families work together to create unique learning opportunities to address the individual needs of the student. The individual programs are developed by focusing on the student's current abilities and their "own curiosity" to build their Student Learning Plan.

## Observations

The auditors found that:

- The staff at SelfDesign worked very hard throughout the week to gather evidence and provide data.
- The Staff know their students very well and are able to articulate their progress and to identify their unique needs.
- All members of the teaching staff of the SelfDesign School are currently certified with the TRB, however, some of the teachers are employed on a Restricted Licence with the TRB. Of those with instructional restrictions, several were teaching subjects that were not on their specified list. This resulted in a systemic review. The full impact of this systemic review was diminished due to the identification of other systemic course issues these instructors taught.
- The teachers lead the educational programs of their students. The teachers communicate with students in a variety of ways to support their learning. They use Skype, Go to Meetings, Zoom, Google Plus, phone, face-to-face, emails and texting to accomplish this.
- The teachers evaluate and assess their students on an on-going basis and for all progress reports and interim reports.
- The School follows the [Distributed Learning-BC Residency Policy](#).
- There were a number of courses claimed where students were not enrolled or active at the claim date.
- Documentation that captures the activities undertaken by Grade 10 to 12 students to demonstrate five percent of the learning activities was not readily evident.
- The School attempted to offer creative solutions for student programming by using education options identified as Board/Authority Authorized (BAA) courses. It was verified that a selection of these courses covered the same learning outcomes of a Ministry Authorized course, which students had previously taken. Contrary to the Ministry directives specific to BAA courses, as BAA courses are to be focused on subject areas not offered through Ministry-developed courses.
- Many of the School's courses identified as BAA courses were created and offered to students without having met the Ministry's criteria for approval of BAA courses, including the [Educational Standards for Independent Schools Policy](#). The [BAA Requirements and Procedures Guidebook](#) says that: "*Schools must have the approval of their Superintendent and Board (for public schools) or Independent School Authority (for independent schools) prior to offering a BAA course. Boards/Authorities must submit the Board/Authority Authorized Course Form (BAA course Form) for newly-developed courses to verify that each new course is compliant with the requirements of this document.*" This audit outcome became a systemic review.
- The School uses face-to-face classes and workshops where attendance is taken. In some instances these courses lacked evidence of DL activation.
- The School uses a process to determine if students can gain course credit through the challenge process, however, some of the students were claimed for funding contrary to the Form 1701 Instructions which states that courses completed via challenge are not to be included in the 1701 data collection process. The [Earning Credit through Equivalency, Challenge, External Credentials, Post-secondary Credit and Independent Directed Studies Policy](#) outlines mechanisms for earning credits and identifies how schools are to report those students who completed eligible courses via challenge and directives around the required procedures for challenge.

- *Prior to engaging in a challenge process, schools must review any documentation of prior learning that a student presents in order to determine if credit can be awarded through equivalency.*
- *The Ministry will fund enrolling boards of education the equivalent per pupil funding of a 1-credit course for each successfully completed course challenge.*
- *Ministry-developed or Board Authorized Grade 10, 11 or 12 courses (including courses with a Grade 10, 11 or 12 Graduation Program examination) must be available for challenge in the district one year after full implementation of the relevant education program guide or Board Authorized course description.*

*Procedures for Challenge*

- *Schools must document the challenge assessment delivered to each student, including a pre-challenge equivalency review, and the documentation must be made available to Ministry auditors if requested.*
- *In the previous school year there were several Grade 9 students with an educational program that contained Grade 10 courses. The School was funded for the students' Grade 9 program, yet once the same students entered into Grade 10 the School chose to report the previously undertaken courses once again when the students moved on to Grade 10. The courses were not active or undertaken during the students' Grade 10 year. Contrary to the [DL Active Policy](#) requiring students to meet the stated activation requirements before considered funding eligible; the [DL Funding Policy](#) "Students in Grades 8 and 9 will be funded at 0.5 FTE plus 0.125 FTE per eligible four-credit course to a maximum of 1.0 FTE per school year" ; and, Form 1701 Instructions "report all new courses leading to graduation in which the Grade 10-12 student has become active".*

*It is only in the instance where students are cross enrolled that those in Grade 9 at one school could be reported for Grade 10 courses during the year in which the Grade 9 program is undertaken aligning with the DL Funding Policy's statement: "A student enrolling only in Grade 10 –12 courses in a DL school, who is also enrolled in Grades K-9 in another school, is counted as a Grade 10-12 student for DL funding purposes."*

- *The School utilizes the Independent Directed Studies (IDS) educational option as a strategy for offering creative solutions for student instruction, however, the related requirements and authentication of the IDS process was not enforced or evident. The IDS course claims did not validate the number of hours or matching course credits; these educational options were not always representative of learning activities of existing Ministry authorized or verified BAA Grade 10 to12 elective courses; there was no evidence that the student initiated their own learning; and, the learning plan was not created prior to the student initiating their learning. In many cases the creation of the partial plan for IDS was used as the indication of activation. Contrary to the DL Active Policy that says the substantive student course activity "must represent a minimum of five percent of the courses' learning activities...must be clearly linked to the learning outcomes of each course."*

*There was no evidence at the School level of authority 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 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. This audit outcome became a systemic review.

- There were a number of students enrolled in the “EOS” program for whom there was no evidence of activation for each course claimed. This audit outcome became a systemic review.
- There were several student claims for Ministry Authorized Work Experience courses that did not meet the requirements for a Work Experience claim.
- With the dispersed nature of the School and the large teaching staff, it became evident that not all of the staff were aware of relevant information regarding the directives of the DL Active Policy, specifically the criteria pertaining to substantive student course activity for Grade 10 to 12 course claims. This created difficulties for educators to consistently provide the correct evidence to align with the DL Active Policy.
- The School currently uses an extraordinary number of course codes and labels which caused confusion during the audit process and it became clear that staff were often perplexed about the differences or nuances of the courses as well.
- The School is in accordance with the [DL-Independent Schools Policy](#) and [DL-General Policy](#) regarding financial reimbursements to third party providers for a majority of the population of the School, however, questions arose about the use of school funding which exceeds the \$600 per student to support Aboriginal students. Funding is allocated at the beginning of each school year and for this year the amount was \$500 for each self-identified Aboriginal student. The eligibility of this practice will be investigated and followed up by the Ministry’s Independent School Inspectors.
- While Kindergarten to Grade 9 student learning plans included all areas of study for the appropriate grade, many students did not have evidence of learning activities in each of those subjects. The student learning plan activities did not always fulfill the full range of curricula for the grade level as required in accordance with the [Educational Standards for Independent Schools Policy](#).

### **Audit Sample Findings**

The auditors found that:

- 3.0000 Kindergarten to Grade 9 FTEs reported in October were not active in the program. There was no evidence the student was active as required by the DL Active Policy and in accordance with Form 1701 Instructions.
- 3.8750 FTE (consisting of 3.7500 Grade 10-12 school-age and 0.1250 non-graduated adults) reported in October had no evidence the student was active as required by the DL Active Policy and in accordance with Form 1701 Instructions.
- 2.1250 Grade 10-12 school age FTEs reported in February had no evidence the student was active as required by the DL Active Policy and in accordance with Form 1701 Instructions.
- 1.0000 Grade 10-12 school-age FTEs reported in October were verified to be part of the educational program the student undertook while in Grade 9.
- 14.0000 Grade 10-12 school-age FTEs reported in October were representative of an educational program called “EOS”. There was no evidence of activation in accordance with the DL Active Policy for each course reported for funding.

- 2.3750 Grade 10-12 school-age FTEs reported in February were representative of an educational program called “EOS”. There was no evidence of activation in accordance with the DL Active Policy for each course reported for funding.
- 1.5000 Grade 10-12 school-age FTEs reported in October were for courses taught by a teacher with a “Restricted Certificate”. It was verified that the provision of instruction in these courses was outside the teacher’s TRB certification authorization.
- 0.1250 Grade 10-12 school-age FTEs reported in February were for courses taught by a teacher with a “Restricted Certificate”. It was verified that the provision of instruction in these courses was outside the teacher’s TRB certification authorization.
- 13.3750 FTEs (consisting of 13.0000 Grade 10-12 school-age and 0.3750 non-graduated adults) reported in October were for an educational option identified by the School as Independent Directed Studies (IDS) that failed to meet all of the requirements and related directives for an IDS course. The 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. These claims are also ineligible for non-graduated adults as IDS are not eligible for credit towards the Adult Graduation program.
- 13.3750 FTEs (consisting of 13.2500 Grade 10-12 school-age and 0.1250 non-graduated adults) reported in February were for an educational option identified by the School as IDS that failed to meet all of the requirements and related directives for an IDS course. These claims are also ineligible for non-graduated adults as IDS are not eligible for credit towards the Adult Graduation program.
- 25.3750 FTEs (consisting of 25.2500 Grade 10-12 school-age and 0.1250 non graduated adults) reported in October were categorized by the School as BAA courses. It was verified that these educational options were ineligible as they did not meet the related Ministry directives and guidelines including the Educational Standards for Independent Schools Policy, nor were these options approved prior to offering and provided to students or reported for funding.
- 16.2500 Grade 10-12 school-age FTEs reported in February were categorized by the School as BAA courses. It was verified that these educational options were ineligible as they did not meet the related Ministry directives and guidelines including the Educational Standards for Independent Schools Policy, nor were these options approved prior to offering and provided to students or reported for funding.
- 0.1250 Grade 10-12 school-age FTEs were reported in October for an ineligible BAA course where the student had previously completed the same Learning Outcomes in another Ministry Course. In accordance with the BAA requirements and procedures, courses with a significant overlap with current provincial curriculum are not eligible for authorization as a BAA option.
- 0.8750 Grade 10-12 school-age FTEs were reported in October for courses reported in an ineligible claim period. There was no evidence the claims met the active requirement in accordance with the Form 1701 reporting timelines and per directives of DL Active Policy.
- 0.3750 Grade 10-12 school-age FTEs were reported in February for courses reported in an ineligible claim period. There was no evidence the claims met the active requirement in accordance with the Form 1701 reporting timelines and per directives of DL Active Policy.

- 0.6250 Grade 10-12 school-age FTEs were claimed for Work Experience. 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](#).
- 0.1250 Grade 10-12 school-age FTEs were reported for an ineligible claim in October. It was verified that the claim reflected a course challenge which is not eligible for funding through the Form 1701 data collection process.
- 0.6250 Grade 10-12 school-age FTEs were reported for an ineligible claim in February. It was verified that the claims reflected course challenge which is not eligible for funding through the Form 1701 data collection process.

## **Recommendations**

The auditors recommend that:

- The School ensure that all DL staff review in detail the non-compliant operational aspects currently in place and immediately ensure the requirements in accordance with the DL Active Policy are implemented including all related reporting issues identified during the compliance audit at SelfDesign. Immediate steps must be taken to align all of the School's processes in accordance with the Independent School Act, Educational Standards for Independent Schools, their DL Agreement, related Standards and DL policies.
- As the School is registered with the Ministry as a Type 8 Facility–Distributed Learning, reporting FTE for funding must be aligned with reporting requirements for distributed learning schools. All DL staff must be knowledgeable of the eligibility requirements and the DL active criteria specific to substantive student course activity including ensuring the activity represents a minimum of five percent of the course's learning activities, activity 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 School ensure that the teachers are capturing the work done by Grade 10 to 12 students (including adults) that demonstrates five percent of the individual course's learning activities and that the evidence is dated and recorded as evidence in the teacher records.
- The School 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 DL staff ensure that courses are claimed for the funding period during which they meet the Distributed Learning 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 directors were not followed.
- The School staff implement practices to ensure all active requirements are identified by program or course and dated in accordance with the directives of the DL Active Policy.
- The School ensure that all data entry correctly captures the course names and activation dates being claimed.
- The School ensure that all BAA courses offer unique learning outcomes, not offered through Ministry Authorized courses.
- The School ensure that all BAA courses created and offered to their student cohort must follow the complete process set out in the [Independent School Act](#), [Board Authorized Course Ministerial Order](#) and according to the [Board/Authority Authorized Courses Requirements](#)

[and Procedures Guidebook](#). All requirements of the BAA policy and guidelines must be met prior to offering and enrolling students in BAA options. Independent Schools must have the approval of their Independent School Authority prior to offering a BAA course. The [BAA website](#) may also be of assistance when ensuring requirements have been met.

- SelfDesign explore their face-to-face educational options and extended workshop models that require attendance through Distributed Learning, as in accordance with the Independent School Act DL is intended to be “*a method of instruction that relies primarily on indirect communication between students and teachers, including internet or other electronic-based delivery, teleconferencing or correspondence*”; and that a “*distributed learning independent school*” means an independent school that offers instruction to its students by means of distributed learning only”. Active attendance criteria must be met for all FTE reported by SelfDesign while they retain a Facility Type 8–DL designation.
- If Independent Directed Study (IDS) educational options are to be offered to eligible students, the School Authority 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. Adherence must align with the 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 Authority 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 student’s defined learning activities and must not include the process used to create the IDS learning option.
- The School ensure that all Challenge courses are aligned with the [policy](#) directives that say: “*report successful course challenges to the Ministry through the Transcript and Examination (TRAX) system by June 30 of the school year in which the challenge occurred. For courses completed via a challenge process, schools must report the appropriate TRAX code in the “Course Type Field.” More information about reporting course challenges can be found in the [Handbook of Procedures for the Graduation Program](#)*”. Challenge courses are not to be reported as full credit courses through the Form 1701 data collection process.
- The School ensure that for Grade 8 and 9 student claims, the Form 1701 reporting instructions are followed. The funding of these educational options are program driven and not per course funding. It is an ineligible claim practice for the Grade 10 to 12 courses, undertaken and funded in the student’s K-9 educational program, to be additionally reported in a subsequent school year.
- The School ensure that Grade 10 to 12 students are active in each eligible course claimed for funding. As Grade 10 to 12 FTE reporting is based on per course funding, when an educational program of courses (such as the “EOS program”), is reported, each individual course must meet the ‘active’ attendance requirements in accordance with the Form 1701 reporting instructions and aligned with the DL Active Policy criteria.

- Should the School continue to offer Work Experience options, all related staff must be aware of the requirements of these Ministry authorized courses including implementation and adherence to Authority 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 School ensure only eligible student FTEs are claimed for the funding of Work Experience and that the students receive an educational program and instructional component in accordance with all Ministry directives related to Work Experience including evidence to verify those claims.
- The School ensure that all instructors currently employed on a restricted teaching certificate are limited to teaching only those subjects listed within the parameters of the TRB's certification requirements.
- The SelfDesign 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 School staff require assistance to create and maintain a consistent practice for activating students according to the DL Active Policy criteria; consistent practice for evaluation, monitoring and dating student work leading to activation; and, consistent practices for establishing five percent of the learning activities determinates for each subject.
- SelfDesign examine the extensive use of course codes to verify learning outcomes do not overlap and streamline the quantity of course codes that are used.
- The School undertake a compliance workshop to aid with their understanding of the various aspects of reporting eligibility for student claims.
- The School and its teachers ensure that all K-9 students are progressing in all areas of the curriculum in each school year, and that student learning activities meet all of the required areas of study.
- SelfDesign be scheduled for a return audit in the 2015/16 school year.

### **Auditors' Comments**

The auditors wish to express their appreciation to the school staff for their cooperation and hospitality during the audit.