



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

2015/16 Distributed Learning Enrolment Audit

AUDIT REPORT

**CHRISTIAN HOMELEARNERS eStreams
(083 96714)**

**2015/16 DISTRIBUTED LEARNING ENROLMENT AUDIT REPORT:
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(083 96714)**

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 British Columbia 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 and 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 DL audit was conducted at Christian Homelearners eStreams May 25 to 27, 2016. The total enrolment reported at February 12, 2016 was 23.0627 FTEs, of which 40 student files were reviewed.

An entry meeting was held with the Principal and the DL school's Program Administrator to review the purpose of the audit and the criteria for funding as outlined in the Form 1701 Instructions. The process for the audit was reviewed and information about the program offered by the DL school was provided. The staff and the auditor discussed the procedures that would be followed to undertake the audit. It had been previously agreed that the audit would be undertaken electronically without the use of paper student files.

The auditor worked out of an administrative office, which is located in a private residence in Grindrod, British Columbia (B.C.). The auditor sought documentation to determine that the courses claimed met the [DL Active Policy](#) criteria by the activation submission date and other related Ministry directives. Throughout the audit there was constant ongoing discussions with the staff to ensure the auditor had an understanding of all aspects of the program. Due to the

complex nature of the student tracking program, the auditor worked directly with the Principal throughout the audit. All recommended adjustments were discussed with the Principal and/or the Program Administrator during the course of the audit, providing them with every opportunity to locate the necessary documentation.

An exit meeting was held with the Principal and Program Administrator where the auditor presented the preliminary results and clarified any outstanding issues. These staff members were informed that continued consultation with Ministry personnel may result in some changes to the recommended adjustments presented at the exit meeting.

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

Description of the Program

Christian Home Learners eStreams began operation in September 2002. The school is administered from a private residence in Grindrod, B.C. The Principal lives nearby in Lumby, B.C. The school has had three Principals in three years which has led to many challenges from an organizational perspective. There is some face-to-face contact between students and their teachers who are located throughout the province. As a number of certified instructors teach their own children, most of the learning and teaching takes place in the students' homes with the guidance of parents and teacher oversight. Teachers located throughout the province results in many supervision challenges for the Principal.

There are options available from the school for homeschooling, DL learning for Kindergarten to Grade 12 students, and for graduation requirements leading to an Adult Dogwood certification. Students are registered from all over the province and serviced by teachers located in different areas of the province. Students and parents may chose their teacher based on biographies available and 'word of mouth'. Student educational programs are individualized to meet student interests and academic needs.

The Board Authority consists of five members including the Program Administrator, parent, teacher and two other individuals.

Observations

The auditor found that:

- All members of the teaching staff of the Christian Homelearner eStreams are currently certified with the Teacher Regulation Branch. One teacher had a subject-restricted certificate, but was not involved with students claimed in the February data collection period.
- The teachers communicate with students in a variety of ways to support their learning. A number of teachers teach their own children which in some instances resulted in an unacceptable standard of documentation. The DL Active Policy requires that *"The following evidence must be readily available: The gradebook or other tracking system must contain a dated record of the teacher's evaluation of the student's performance on the course activities...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."

- The teachers evaluate and assess students on an on-going basis and for all progress reports.
- The school is in accordance with the Distributed Learning-Independent Schools and Distributed Learning-General Policy regarding financial reimbursements to third party providers.
- The school has no B.C. Residency policy and/or procedures in place. The school does have a form which asks the parent to give their B.C. address and citizenship/immigration information. Beyond the address as stated, there is no verification process to determine B.C. residency.
- Student Progress Reports did not report on DPA as required in the Reporting Student Progress: Policy and Practice document.
- For a number of students, the Progress Reports documented that courses continued through more than one school year. In a number of cases, at the school's directive, students were withdrawn (W) from the course in June and reclaimed when they re-started the course again in the Fall often under the portents of partial IDS credits. When students were withdrawn in June, the report card indicated one course name and was then changed at some point to reflect a different course name often with an IDS designation. The evidence indicated when the student returned to the course they moved on to the next assignment confirming students were continuing in the same course and therefore only eligible for a single funding claim.
- 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. Each teacher makes an individual decision as to what constitutes five percent of the course's learning activities. The standard is for the student to complete at least five percent of the total learning outcomes of a course based on the learning activities in the Integrated Resource Package (IRP). There was no consistency and considerable variation in actual assignments required for activation for any given course.
- In September 2015 one Grade 8 and one Grade 9 student were claimed and funded for 1.0000 FTE. These students were then claimed for Grade 10 courses in February. It is only in the instance where students are cross enrolled that those in Grade 8/9 at one school could be reported for a Grade 10 course in another school during the year in which the Grade 8/9 program is undertaken. The [DL Funding Policy](#) says: "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, yet the related requirements and authentication of the IDS process was not eligible, enforced or evident. The IDS claims did not clearly validate the number of hours or matching course credits; 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 and was in some instances non-existent.
 - There was no evidence at the school level of authority governed procedures regarding awarding credit through IDS in accordance with the related 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.*

- 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. From the perspective of the Program Administrator educational options were identified as IDS based on the following:
 - The student did not finish the course by June and was withdrawn by the school and then re-enrolled at a later date.
 - The student needed more time to finish the course.
 - The student could be pursuing the curriculum in more detail.
 - The person teaching the course was not a specialist in the curricular area.

A number of student claims were for ‘required’ courses (e.g. Graduation Transitions and English 12) not previously taken, nor was there evidence to verify these were actual eligible claims. It should be noted that IDS is only for elective credit and that the school’s reported credit assignment appeared to be based solely on the number of hours the student took to complete the work, yet in accordance with the [Handbook of Graduation Procedures P.58](#) it says: “*One credit represents the value attached to the **knowledge, skills and aptitudes that most students can acquire in approximately 30 hours of instruction***”. Credit assignment based solely on length of time a student takes to complete the course does not align with this directive.

- There were several student claims for Ministry authorized Work Experience courses that did not meet the eligibility requirements aligned with the Ministry directives. There was no dually completed Work Experience Agreement Form; monitoring and supervision was not apparent beyond that of the family environment; there was no evidence of an orientation; no evidence of student safety coverage, or assessment and evaluation; and there were no Board Authority guidelines in place.
- With the geographically dispersed nature of the school, 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. There was no consistency for the same course, among teachers, as to what constituted substantive student course activity.
- The school has a course enrolment/selection form but it does not list the courses in which the student is currently enrolled or the date(s) of enrolment, contrary to the directives of the DL Active Policy. It was not apparent which courses were being claimed and for what claim period. The form is not signed by the student or parent. In some instances there is an agreement to the plan noted in an email.
- Work submitted as substantive activity by students was not dated. The marking by teachers was often not obvious or non-existent on the assignment itself, but a recorded mark was found attached to a specific learning outcome, which was dated as completed. There was evidence of teacher anecdotal feedback throughout the claim period.
- A student was claimed for Instrumental Music: Orchestral Strings IDS for a Royal Conservatory of Music Piano 8 which was an External Credential, recognised for credit but not a funded course.

Audit Sample Findings

The auditor found that:

- 0.3750 school-age Grade 10-12 FTEs reported were enrolled in fewer courses than claimed.

- 1.0000 school-age Grade 10-12 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](#).
- 0.7500 school-age Grade 10-12 FTEs were claimed for self-paced courses that have an open-ended timeline but encompass only one organized set of learning outcomes. While completion of the course's learning outcomes may have been over a number of registration periods, only one course is undertaken and therefore eligible for only one funding claim (see Form 1701 Instructions P.11).
- 0.6250 school-age Grade 10-12 FTEs 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 claim. It was verified that while the multiple credit course claims were recognised by the school as IDS, once the learning outcomes were met the report card/transcript recording of the educational options were renamed. Based on the Program Administrator's interpretation of 'personalized' learning, the school's decision was to base funding claims on incorrect determinates. As a standard practice the school made the decision to withdraw the students if the educational session continued past June of the current school year; the IDS identification process enabled the ineligible practice of over-reporting the actual credit assignment for funding of the educational options undertaken and were not aligned with the actual course name stated on the student's initial progress and transcript reporting. For clarification regarding personalized learning, the Ministry curriculum definitions are found here: <https://curriculum.gov.bc.ca/sites/curriculum.gov.bc.ca/files/pdf/glossary.pdf>.
 - **Areas of learning** are discipline-based fields of knowledge. Science, Arts Education and Social Studies, for example, are all areas of learning that comprise learning from multiple disciplines. Areas of learning contain the learning standards that make up BC's provincial curriculum program. Each area of learning contributes particular understandings and competencies to the development of educated citizens.
 - **Subject area** is the term used in the IRPs to describe what students are expected to know and be able to do in a subject. The term is not used to describe the redesigned curricula because teachers can combine the learning standards in various ways from different areas of learning to create integrated units or design integrated areas of learning.

For all required areas of learning there is the ability for instructors to be creative in how instruction in the required areas of learning in various subject areas is undertaken through personalized learning which is *the tailoring of curriculum, methods and approaches, and learning environments to meet the interests, learning needs and aspirations of learners. It also provides them with the flexibility and choice to pursue their individual interests and passions.* This is not an educational option but an educational process. While there are no eligibility requirements for personalizing the student's learning in each required area of study, there are specific requirements for per course funding claims.
- 0.6250 Grade 10-12 school-age FTEs were verified to be part of the educational program the student undertook while in Grade 8 or Grade 9 which is contrary to the DL Active Policy requiring student claims to meet the stated requirements before considered funding eligible. It is only in the instance where students are cross-enrolled that **those in Grade 8 and 9 at one school could be reported for Grade 10 courses in another DL school** during the year in which the Grade 8 or 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.” Reporting a student for a funded Grade 8 or 9 educational program and further reporting the student for a Grade 10-12 course in the same school, during the same school year does not meet the DL Funding Policy directives.

- 0.1250 Grade 10-12 school-age FTEs were for an ineligible claim identified as an IDS course which was verified to be an External Credential credit recognition for a Grade 8 Royal Conservatory of Music-Piano.

Recommendations

The auditor recommends that:

- As the school is registered with the Ministry of Education as a DL school, 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 dated and clearly linked to the learning outcomes of each course, the activities 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 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 school develop a B.C. Residency policy or set of procedures as verification students are eligible for a funded educational program and as required by the [Distributed Learning – BC Residency Policy](#).
- The school develop a Course Selection/Enrolment form which meets the Active Policy’s definition which includes a listing of the course(s) in which a student is enrolled and the date(s) of enrolment and is signed by the parent and/or student.
- 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. All requirements must be in accordance with the directives in the [Work Experience Order M237/11](#), and the [Program Guide for Ministry-Authorized Work Experience Courses](#).
- The school cease the duplicate reporting of courses in consecutive school years. Self-paced or courses that have an open-ended timeline encompass only one set of learning outcomes. While the completion of the course’s learning outcomes may be over a number of registration periods, only one course is undertaken regardless of hours of study and therefore eligible for only one funding claim as per Form 1701 Instructions.
- The school cease the current standard process of assigning a large variety of learning activities associated with courses’ required areas of learning as IDS. If 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 related 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 the Principal has approved courses arranged between teachers and students in addition to the IDS plan.

- The school ensure that for Grade 8 and 9 student claims, the Form 1701 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.
- The school 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 Ministry of Education consider scheduling the school for a return audit.

Auditors' Comments

The auditor expresses appreciation to the school staff for their cooperation and hospitality during the audit.