



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

**2015/16 K-12 Regular Enrolment Audit**

**AUDIT REPORT**

**SCHOOL DISTRICT No. 38 (Richmond)**

## **2015/16 K-12 REGULAR ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 38 (Richmond)**

### **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 Kindergarten to Grade 12 (K-12) Regular Enrolment 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.

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.

In the 2015/16 school year, boards of education reported a total of 513,312.7280 FTEs in Kindergarten through Grade 12. School District No. 38 (Richmond) reported a total of 19,805.3750 FTEs or 19,871 students, including 5,796 students for English Language Learners (ELL) and 220 students for Aboriginal Education .

### **Purpose**

The purpose of the K-12 Regular 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* and related Ministry policies.

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

A K-12 Regular Enrolment audit was conducted in School District No. 38 (Richmond) during the week of January 18, 2016. The schools audited were:

- Steveston London Secondary
- R Alex McMath Secondary
- Station Stretch Alternate

The total enrolment reported by these schools on October 2, 2015 was 2,383.4375 FTEs, of which 781 student files were reviewed. For each of the schools audited, a segment of the students reported in the 2015/16 school year were selected for review. The review was extended to include all reported students for analysis when school-wide issues were identified by the audit team.

An entry meeting was held with the Superintendent and each school's Principal to review the purpose of the audit and the criteria for funding as outlined in the Form 1701 Instructions. The audit team visited each school to review student files, interview staff, and conclude on their observations. The audit team followed a process in each school which gave administrators and program staff opportunities to locate and present additional evidence when the team found that such evidence was not available in the documentation presented by the school.

Exit meetings were held with each Principal and the Superintendent. At each exit meeting the auditors presented their preliminary results and clarified any outstanding issues.

The audit included the enrolment reported in the 2015/16 school year. The areas audited were:

- September 30, 2015 enrolment and attendance
- Ordinarily Resident
- School-Age Grade 10-12 Course Claims
- Alternate Education Programs
- Adult Student Claims
- English Language Learning Supplemental Claims
- Aboriginal Education Supplemental Claims
- Career Program Courses

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

## **Observations**

The auditors found that:

- 0.1250 school-age Grade 10-12 FTEs claimed for funding were enrolled in and attending fewer courses than reported at the Data Collection claim date. The [Form 1701 Instructions](#) (P.13) states *"To obtain funding for school-aged students, boards of education must meet the following criteria:...report the student's annual plan of courses leading to graduation in which the student was enrolled and in attendance as at September 30, 2015.*
- 0.1250 non-graduated adult FTEs claimed for funding were enrolled in and attending fewer courses than reported at the Data Collection claim date.
- 0.2500 non-graduated adult FTEs reported for funding did not meet the attendance requirements for adult claims. As stated in the Adult Funding Policy *"Attendance is defined to be over one reporting period AND either 1) a minimum of 10 hours of instruction in a classroom or learning centre for each course or a demonstrated completion of 10% of the course requirements OR 2) meets the Grade 10-12 active requirements as outlined in the [DL Active Policy](#).*
- 2.7500 school-age Grade 10-12 FTEs were claimed for a funded support block when it was verified that the student's annual combined program of courses consisted of courses plus a support block that exceeded a total of eight full credit course claims. P.14 of the Form 1701 Instructions states: *"A support block is for non-special needs, school-aged, non-graduated students in grades 10-12 and SU engaged in their learning at structured times in addition to their annual academic or regular program courses provided in District schools and are*

taking fewer than 8 courses. The combined total number of support block and courses leading to graduation cannot exceed 8 for these students”.

- 9.2500 school age Grade 10-12 FTEs were claimed for an ineligible support block. It was verified these blocks were not held during regularly scheduled school class hours and regular attendance was not expected.
- For Alternate Education, the District reports their student claims through one Facility centre identified as Station Stretch which combines (in accordance with the District’s website) three alternate forms of district support available to the student population.  
9.0000 school-age non-graduated FTEs claimed were not in attendance nor was there evidence to meet the requirements of the Alternate Education School Program Policy. The policy states...“*Each Alternate Education Program will have: 1) An intake process to facilitate district referrals or self-referral; 2) An annually reviewed learning plan for each student, either an official Individual Education Plan (IEP) or a Student Learning Plan that clearly defines the objectives for the student, additional services provided as required, progress made, and any transition plans.; 3) An exit strategy to facilitate the students transition either back into regular school system, continuing education centre, graduation, or to work and to post-secondary training and education; and 4) Evidence of additional services as required by the student population*”.
- In accordance with the Alternate Education School Program Policy: *Alternate education programs must satisfy certain requirements to be deemed a type Three facility. If the programs meet those requirements, then their students qualify for 1.0 FTE (full time equivalent) funding to the school district. Alternate education programs must focus on the educational, social and emotional issues for students whose needs are not being met in a traditional school program.* For these FTE claimed, there was no evidence of students receiving differentiated instruction, specialized program delivery or enhanced counselling services specific to each students’ needs, nor of individualized clearly defined objectives, recognition of additional services each student required, what progress is/was made or transition plans or exit strategies.
- It was verified that for the District’s Alternate Education Program school, nine of the students associated with the Community Outreach Teachers were not attending an education program that provided support based on the students’ needs. These school-age individuals assigned to the Community Outreach Teachers did not attend or receive an educational program. There was evidence the teachers tried to make contact but the students did not attend or receive an educational program/services. In order to be eligible for a funding claim, the students must be enrolled and receiving a program as outlined in the criteria. It was verified that all students reported through the Horizons and Station Stretch programs met the Alternate Education Program criteria.
- 19.2500 school aged Grade 10-12 FTEs were claimed for Work Experience. There was no verifiable evidence aligned with 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](#). Contrary to the directives, one program had the students reported as undertaking a Work Study Program at their own secondary school. The Legislative directives for Work Experience identifies that work experience is to be undertaken at a standard work site which is a location other than a work site created specifically for work experience by a school or board. This issue accounted for 8.5000 FTE adjustments. In another funded offering, student volunteer hours were used as

the Work Study Program portion of the Work Experience claims with no evidence of the required work experience agreements, coverage by WorkSafeBC, or private insurance (as required for career simulation work study options). These claims accounted for 10.7500 FTE.

In accordance with the directives specific to the Ministry Authorized Work Experience 12A and 12B, the Ministerial Order defines "*Work Study Program*" as ***Work Experience at a Standard Work Site***; and "*Work Site Employer*" means an ***Employer that is subject to the Workers' Compensation Act, including an Employer who is not-for-profit or a community service organization***

*"Standard Work Site" as a location, other than a work site created specifically for work experience by a school or board, (a) at which a worker performs the tasks and responsibilities related to an occupation or career under the general supervision of an Employer, or (b) at which a self-employed person performs the tasks and responsibilities related to that person's self-employment.*

The Elective Work Experience policy says:

*This policy clarifies elective work experience courses that extend beyond the 30 hours of work experience and/or community service required for graduation, and provides important information about Workers' Compensation Board (WCB) coverage.*

*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.*

*Elective work experience courses are monitored by schools and usually offered as part of a career program. They go beyond the work experience or community service component required by Graduation Transitions. Those involved in work experience electives must follow required steps to address workplace safety for students.*

*In most cases, Ministry-authorized work experience consists of school-arranged, non-paid placements. Exceptions include Secondary School Apprenticeship, other industry-training work programs, and individual situations in which a student's paid employment coincides with the student's career plans and is supported and monitored by the school.*

These FTEs reported for funding did not have evidence to align with the required directives.

- There is evidence of District directives that identifies: "Secondary schools are responsible for the registration, record keeping, monitoring and evaluation of WEX blocks". While these District directives are in place, the staff at the schools gave the impression of being unfamiliar with the documentation and criteria required to support Ministry Authorized Work Experience 12A and 12B claims.
- 1.1250 school age FTEs reported for funding were not ordinarily resident in British Columbia. Evidence verified this was an International student. In accordance with the [K-12 Funding General Policy](#) "*To be eligible for provincial funding, Boards of Education must ensure that students are: ordinarily resident in BC (and where applicable for school-age students) with their parent/legal guardian*" International students are not ordinarily resident and therefore ineligible for provincial funding.
- 6.5000 FTE school age FTEs were ineligible claims reported for funding. In these instances, students were reported for two course claims aligned with Advanced Placement (AP) options. In accordance with the Form 1701 directives: *Schools may claim an AP course as a separate course in this section only if it meets the definition of a course, is a separate and distinct instructional session of approximately 120 hours (for a four credit course) on the*

*student's timetable, the course is being taught by a certified teacher and is in accordance with the Student Credentials Ministerial Order M164/96". A second course reporting of the AP option did not align with these reporting directives and was without a distinct set of learning activities related to a set of learning outcomes.*

- Two students claimed for ELL supplemental funding had no evidence to demonstrate requirements related to the provision of services were being met, as required in the [ELL Policy and Guidelines manual](#). There was no evidence of additional services or support provided. ELL supplementary funding is funding in aid of additional services over and above the standard curriculum.
- Schools coded support blocks with the XLD designation. In accordance with the Form 1701 Instructions, the course code for reporting school-age non-graduated non-special needs students is XSPBK (see P.14 of the Form 1701 Instructions). Non-credit codes specific to students with a special needs designation is the XSIEP code which can be assigned if the activity is being used to assist the student in meeting one or more of their IEP goals (see P.12 of the Form 1701 Instructions). No recoveries were recommended in this instance as verification of eligibility at the time of the audit was based on the non-credit support claim meeting the Ministry directives and not representative of an incorrect block code.
- The District has a centralized registration process for all students new to the District. Evidence found at all schools were consistent with the District's policies and practices verifying students as ordinarily resident in British Columbia.
- All students claimed for an Aboriginal Education supplemental service were verified to have received services and/or support in accordance with the [Form 1701 Data Collection Instructions](#) and the [K-12 Funding-Aboriginal Education policy](#). The itinerant Aboriginal Success Teacher ensures comprehensive programs of support and services are offered to the Aboriginal students in the secondary schools.

## **Recommendations**

The auditors recommend that:

- Schools claim only those students who are enrolled and attending as at the Data Collection claim date.
- For Grade 10-12 school-age students, schools report only those eligible courses that are scheduled on each student's timetable as at the Data Collection claim date, including evidence to verify the eligible Grade 10-12 funded courses.
- In the case of Advanced Placement courses, only courses that have separate and distinct learning activities; are taught by a certified teacher; have mandatory attendance and reporting; and, are scheduled on the same basis as any other funded courses can be claimed for funding. It is also recommended that schools maintain evidence that these requirements are met as verification of the funding claims.
- The District ensure that only students ordinarily resident in British Columbia are claimed for funding. International students are not eligible for funding claims.
- Schools amend their current practice of using XLD when reporting non-credit support blocks for all students and align reporting in accordance with the Form 1701 directives.
- Schools ensure that support blocks are only reported when they meet the Ministry's reporting requirements specific to support block eligibility in accordance with the Form 1701 Instructions. Support blocks used as placeholders on student timetables are ineligible funding

claims, nor are support blocks funding eligible for drop-in service outside the scheduled in-school timetabling.

- All Schools reporting support blocks ensure that only eligible support blocks are claimed. When reporting support blocks the combined number of courses and support blocks in the student's annual educational program, including those taken to assist with any DL program, cannot exceed eight, as identified on P.14 of the Form 1701 Instructions.
- The District ensure that all related school staff are fully aware of and adhering to the Ministry Authorized Work Experience (WEX) directives and align their service provision to students in accordance with the directives, including:
  - all students claimed for work experience courses have completed a agreement before students begin their work study program and there is evidence the students are covered by WorkSafe BC or individual insurance coverage (as applicable).
  - all students have had an in-school orientation specific to the performance of tasks and responsibilities related to work placements and in addition to any Planning 10 orientation.
  - elective student work experience placements goes beyond the work experience or community service component required for Graduation Transitions.
  - students on work placements are monitored through work site visits, phone calls or emails with the student's workplace supervisor and there is evidence school personnel have monitored students in accordance with board guidelines.
  - only eligible student FTEs are claimed for WEX and the students are receiving an educational program and instructional component in accordance with all Ministry directives related to WEX including evidence to verify the claims.
- The District undertake a workshop to ensure all school WEX coordinators are aware of and following the WEX directives and as outlined in the related guidelines assembled by the District staff.
- The District implement processes to ensure there is alignment with the claim eligibility, operational and service requirements in their Community Outreach Teacher service and take steps to ensure all of the requirements in the Alternate Education School Program Policy are being met when reporting students. The Form 1601 Instructions define Alternate Education School Programs - Type 3 facilities - as those that: *“focus on the educational, social and emotional issues for those students whose needs are not being met in a traditional school program. An alternate education school provides its support through differentiated instruction, program delivery and enhanced counselling services based on student need.”* Students who do not register, attend, or receive an educational program aligned with the Alternate Education School Program Policy are not to be reported for funding.
- The District schools ensure that the requirements for supplementary ELL funding, as set out in the Form 1701 Instructions and ELL Policy and Guidelines manual, are met before each student is reported for this supplemental funding.
- Adult students only be claimed for funding when the directives as outlined in the Adult Funding Policy are met, including evidence aligned with the attendance requirements.
- The District and schools ensure the accuracy of all claims before remitting funding claims, including student eligibility, accurate per course FTE, attendance, and verification of residency in British Columbia.
- A return audit be scheduled to ensure the recommendations in accordance with Ministry directives are put into practice.

**Auditors' Comments**

The auditors extend their appreciation to the District and school-based staff.