



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

2015/16K-12 Regular Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 52 (Prince Rupert)

2015/16 K-12 REGULAR ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 52 (Prince Rupert)

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. 52 (Prince Rupert) reported a total of 2,052.6250 FTEs or 2,072 students, including 169 students for English Language Learners (ELL) and 1,278 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. 52 (Prince Rupert) during the week of February 1, 2016. The schools audited were:

- Charles Hays Secondary
- Pacific Coast (Alternate)

The total enrolment reported by these schools on October 2, 2015 was 714.3750 FTEs, of which 273 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. An entry meeting was held with the Superintendent, each school's Principal and program staff 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 that 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
- Reciprocal Exchanges
- Post-Secondary Transition Programs with Post Secondary Institutions and Industry Association partners
- Other 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:

- 0.8750 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.
- 0.3750 school age Grade 10-12 FTEs were claimed for a funded support block. It was verified that the student's annual combined program of courses consisted of courses plus a support block that exceeded a total of 8 full 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"*.
- 13.0000 school-age FTEs claimed through the Alternate Education School were not adhering to the service provision 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”.

For these FTE recoveries, the District’s Alternate Education Program school was without evidence of an education program that provided support based on the specific needs for a student enrolled in an Alternate Education School Program. 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.* Although there was an intake process and a student learning plan or IEP there was no evidence of an educational program that offered opportunities for these vulnerable and at-risk students to experience success. There was no evidence students received 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 for each student claimed.

- It was verified that there was limited attendance by students enrolled in the school. There was evidence of small class sizes enabling individual attention from a teacher in the academic courses which aligns with the Principal and the School Counsellor describing the facility as “a school of choice” rather an Alternate Education Program School.
- The student timetables, in terms of the courses taken and the number of courses enrolled in, reflected a traditional school program. The courses were those leading to a Dogwood certificate. The students tended to be enrolled in four to six courses per year and the transition and exit strategies were not in evidence.
- It was confirmed students had the opportunity to attend or not attend either at the school or in the classroom.
- Many of the non-special needs students claimed for an Alternate Education Program had learning plans identifying only the graduation courses required, not unlike that of a standard school. These learning plans did not contain objectives, additional services, progress made and/or specific transition plans contrary to the Policy requirements for an Alternate Education School Program.
- The School has an admission process stated on its’ web page but there was little evidence that the process was being undertaken or followed. Although most students had an interview with the Principal and/or Counsellor there was little evidence of support strategies or monitoring. A one page Personal Education Plan indicating the student’s name, grade, birthdate and graduation program was filled in during these interviews.
- A number of students attend this school based on a self-referral. Self-referred students respond to the question ‘what brings you here”. It was verified that if the student had previously attended the Alternate Education Program School they could return without going through an intake process.
- There was little evidence of extra services being provided to the student population with the exception of the daily breakfast and a special outdoor activity once a month.

- According to the Superintendent “*the district ratio for secondary counselling support is 280.5 – 1 FTE. Additional counselling support at PCS is provided. The ratio provides 0.3 and we support at 0.4*”. The ratio of counsellors to students is only slightly higher than at the secondary school. During the audit, the one support worker in the classroom was there to support two special needs classified students.
- 0.6250 adult 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.
- 3.0000 non-graduated adult FTEs claimed for funding did not meet the attendance requirement for eligible courses. The [Adult Funding Policy](#) states that “*Eligible courses will be funded if they are documented on a Course Enrolment Form and if the student taking the course(s) meets the attendance requirements*”. “*Attendance is defined to be over one registration 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 active policy for distributed learning*”.
- 0.1250 graduated adult FTEs were claimed for a course that was not on the [list of tuition free courses for graduated adults](#).
- 6.2500 school age Grade 10–12 FTEs were verified as ineligible student claims. Evidence confirmed that one non-resident student through a Rotary Exchange was aligned to a resident student who graduated in June 2015. The remaining non-resident students were part of a Shecana International Schools exchange program where there was no ordinarily resident student aligned with each non-resident student. In accordance with the Form 1701 Instructions, “*An exchange student is school aged and non-graduated involved in a reciprocal and equal educational exchange. This exchange must be one in/one out of the same board for the same length of time. Boards receive funding only for the ordinarily resident student. During a one in/one out reciprocal and equal exchange, the non-resident student acts as a placeholder for the funded local student during that student’s absence*”. *Claiming funding for a non-resident student after the resident student has graduated does not meet the reporting requirements*”.
- Seven student claims 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](#) and in accordance with the P.8-9 of the Form 1701 Instructions. 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.
- All files for Aboriginal Education students were well organized and maintained and were easy to access.
- The District’s Aboriginal Education program is a comprehensive program containing both breadth and depth in their offerings and services, and appears to be well supported by the local aboriginal community.
- All documents and information relating to WEX were well organized, complete and easily accessed.

- During the audit there were major issues around the question of accessing accurate September 30th timetables. The School was able to find the student timetables for the first semester and Verification Reports for September 30th and October 15th. The auditors used these documents along with the add and drop information as well as student report cards to make a determination for the student claims at the Fall Data Collection claim date.

Recommendations

The auditors recommend that:

- The District and schools ensure there is retained evidence (including Data Collection claim date timetables) for all students in order to verify all the funding claims for the current school year. Courses reported for funding must be verifiable at the required deadline. As identified in the August 28, 2015 audit notification to the District's Superintendent and Secretary Treasurer; additionally in the September 2015 notification to District Level 1 staff, and as noted on P.3 of the Form 1701 Instructions, *"The Ministry strongly advises schools to retain student attendance and participation documentation for each reporting claim to facilitate in the resolution of duplicate enrolment and to assist in the enrolment audit process."*
- Schools claim only those students who are enrolled and attending as at the Fall 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 Fall Data Collection claim date, including evidence to verify the eligible Grade 10-12 funded courses.
- Schools retain evidence to verify that courses claimed are eligible for funding.
- All schools reporting support blocks ensure that only eligible support blocks are claimed. When reporting support blocks in a school-age student's annual program of courses the combined number of courses in the student's annual educational program, including those taken in a Distributed Learning program plus support blocks cannot exceed eight in total, as identified on P.14 of the Form 1701 Instructions.
- Should the decision be to continue to report Pacific Coast School as an Alternate Education School Program facility to the Ministry of Education, the District must immediately implement processes to ensure there is alignment with the operational and service requirements in this facility 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."*
- The District review and revise the Alternate School's admission process to ensure it is comprehensive; provides the student and the School with an individual plan for each student including individualized additional services and support; and, planning contains a realistic exit strategy for the student.
- The District review the criteria for the Student Learning Plans of the non-special needs school-age students attending in Alternate Education Programs. The District's Alternate Education Program school servicing must meet the criteria stated in the Alternate Education

School Program Policy. Student Learning Plans must contain objectives for the student, additional services to be provided to the student, progress made towards the student's goals and specific transition plans. The Policy also requires Alternate Education programs to provide support through differentiated instruction, specialized program delivery, additional services and enhanced counselling services based on students' needs. In addition to identifying the courses the student requires to graduate, such learning plans must clearly define the objectives for the student, additional service requirements, progress made and a transition plan.

- The District schools ensure that the requirements for supplementary ELL funding as set out in the Form 1701 Instructions and ELL Policy and Guidelines 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 that the attendance requirement has been met.
- The District ensure all schools offering Exchange Programs adhere to the directives and reporting requirements for "Exchange Students" found in the Form 1701 Instructions and the [Eligibility of Students for Operating Grant Funding Policy](#) when claiming students. The District should ensure that verification evidence is retained, including the identification of the eligible resident student and non-resident student's reciprocal exchange information and verification that the exchange is with the same district for the same length of time within the school year. Reporting both resident and non-resident student during the same funding period; reporting a graduated student along with the partnered non-resident student; and/or reporting a non-resident student without a participating partnered resident student for funding does not meet the requirement that "*Boards receive funding for the ordinarily resident student*".
- The District ensure that all students claimed on the Form 1701 are ordinarily resident in British Columbia in accordance with the School Act, the Eligibility of Students for Operating Grant Funding Policy and the K-12 Funding General Policy.
- The District ensure that non-graduated and graduated adult students are only reported for eligible courses. Adults can be charged tuition for those courses that are not eligible for funding.
- The District continue to review their processes for data management to ensure only accurate information is relayed to the Ministry of Education.
- A return audit be scheduled to ensure the recommendations in accordance with Ministry directives are put into practice for all student exchange claims and to verify Pacific Coast School, as an alternate school.

Auditors' Comments

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