



**Ministry of Education
Resource Management & Corporate Services Division**

2016/17 Distributed Learning Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 22 (VERNON)

VLearn

2016/17 DISTRIBUTED LEARNING ENROLMENT AUDIT REPORT

SCHOOL DISTRICT No. 22 (Vernon)

Background

The Ministry of Education funds boards of education based on the number of student full time equivalents (FTEs) reported by the districts on [Form 1701: Student Data Collection](#) (Form 1701). The FTEs are calculated by factoring the number of qualifying courses the student takes. A funding formula is used to allocate funds to boards based primarily on the calculated student FTE.

The Ministry of Education annually conducts Distributed Learning (DL) audits, in selected school districts, to verify enrolment reported on Form 1701. School districts are selected for audit based on a variety of factors, including the length of time since their last audit, enrolment size, and changes in enrolment.

DL programs and courses are alternatives to regular classroom-based instruction for students in Kindergarten to Grade 12 providing a method of instruction that relies primarily on indirect communication between learners and BC certified educators, including internet, other electronic-based delivery, teleconferencing, and correspondence.

Since 2009/10 funding recoveries are expanded to include FTEs outside of the sample where the auditors can make a clear link between the audit findings in the sample and those FTEs outside the sample.

There are over 60 centres reported as public Distributed Learning schools in the Province totalling 3,809.1253 FTEs as at February 2017 for the 2016/17 school year. VLearn DL School at School District No. 22 (Vernon) reported a total of 78.5000 FTEs on their February 2017 enrolment.

Purpose

The purpose of the DL Enrolment audit is to provide assurance to the Ministry of Education and boards of education that Ministry policy, legislation and directions are being followed. The audits are based on [Form 1701: Student Data Collection, Completion Instructions for Public Schools](#), current [Distributed Learning Agreements](#), and related [Ministry policies](#).

Description of the Audit Process

A DL audit was conducted at VLearn DL School in School District No. 22 (Vernon) during the week of May 1, 2017. A total of 235 student files or 69.2500 FTEs were reviewed from the February Data collection.

Entry meetings were held with the Superintendent, Director of Student Services and with the DL Centre's Principal, Director of Curriculum, the Career Programs Coordinator, teachers and support staff to review the purpose of the audit and the criteria for funding as outlined in the Form 1701 Instructions. The process of the audit was reviewed, and the procedures and processes followed by the Centre were discussed. The administrator, staff and the audit team

discussed the steps which the auditors would take to ensure effective communication between the auditors and the Centre's administrative team/designated contacts.

The audit team worked out of a large classroom within the school and were provided with computers for use in accessing the Centre's database. Paper records for each student included in the audit sample were also provided. The auditors sought documentation to determine that the courses claimed met the active criteria by the activation submission date and other related Ministry directives. Throughout the audit there were ongoing discussions with DL staff to ensure the audit team members understood all aspects of the program. All recommended adjustments were discussed with the staff during the audit process, providing every opportunity to locate the necessary evidence.

Exit meetings were held with the DL Principal, the Career Programs Coordinator, teachers and support staff, as well as the Superintendent and Director of Student Services. At each exit meeting the auditors presented their preliminary results and clarified any outstanding issues.

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

Description of the Program

Most of the DL program is run out of the main VLearn site in Vernon with some teachers working at other school-based sites to support cross-enrolled students.

The VLearn DL program supports students from Kindergarten to Grade 12, as well as adults working on their education program towards graduation or upgrading for post-secondary access. As part of the enrolment process for the elementary students and some of the non graduated adult learners, the Centre uses subject-based assessments to help ascertain the appropriate placements. VLearn offers self-paced and flexible programs of courses with the main delivery model through computer managed instruction. The Centre timetables some face-to-face classes for their elementary students and additional student support is available for all learners. Work Experience courses are offered District-wide, including at VLearn.

The District's academies are generally run out of the DL Centre in partnership with community organizations. Students participating in the various academies receive specialized instruction and learning opportunities in the subject area through locally developed Board/Authority Authorized (BAA) courses. Most of the students taking the academy options are cross-enrolled in the local high schools.

Observations

The auditors found that:

- The DL staff and administration clearly demonstrated their knowledge of each student and their commitment to their educational program.
- The DL Centre followed the District's policy to verify that students, along with their parent/guardian (where applicable), were ordinarily resident in British Columbia.
- Teacher-developed student learning plans for Kindergarten to Grade 9 students were

complete and contained details about the program being followed. These plans, with a corroboration by the parent, were the documentation of the parents' commitment to the student learning plan. There was dated evidence of work submitted by the student to the teacher as evidence of the student's active participation in the program.

- The courses listed on the Grade 10-12 and adult course enrolment forms occasionally differed from the courses claimed. The DL staff were able to assist with the verification of which courses were claimed.
- The DL Centre was in accordance with the [DL General Policy](#) regarding financial reimbursements to third party providers.
- While it was verified that there are appropriate educational programs present amongst the District's various Speciality Academy options and DL active requirements were met, there were omitted academy requirements.

Per School Act Sec 82.1 **Specialty academies:** *(1) In this section, "specialty academy" means an educational program that emphasizes a particular sport, activity or subject area and meets the prescribed criteria set out in the regulations.*

(2) A board may offer a specialty academy if (a) the board has consulted with the parents' advisory council for the school where the board proposes to offer the specialty academy, and (b) the board is of the opinion that there is sufficient demand for the specialty academy.

(3) A board that offers a specialty academy must (a) make available sufficient instruction for students enrolled in the specialty academy to meet the general requirements for graduation, and (b) continue to offer a standard educational program in the school district.

(4) Despite section 82, but subject to section 82.4, a board may charge a student enrolled in a specialty academy fees relating to the direct costs incurred by the board in providing the specialty academy that are in addition to the costs of providing a standard educational program.

(5) On or before July 1 of each school year, a board that offers a specialty academy must (a) establish a schedule of fees to be charged under subsection (4), and (b) make the schedule of fees available to the public.

(6) Before establishing a schedule of fees under subsection (5), a board must (a) consult with the parents' advisory council for the school where the specialty academy is offered, and (b) obtain the approval of that parents' advisory council for the schedule of fees.

- The Board had not met the requirement to ensure parent consultation through the parent advisory council (PAC), nor was there evidence of goods and services costs disclosure to other related parent groups. During the audit the DL Principal met with the PAC and obtained the required approvals.
 - While the District established conditions with the various sport associations to maintain a fund to support students with financial challenges, the District is required to have a policy for financial hardship so as not to preclude participation by students who could be excluded from educational options, including those with an inability to pay academy fees. As referenced in Section 82.4 of the School Act: **Requirement for financial hardship policy** Sections 82 (3), 82.1 (4), 82.2, 82.3 and 82.31 (3) *apply only to a board that has established policies and procedures to facilitate participation by students of school age ordinarily resident in British Columbia who would otherwise be excluded from the course, class or program because of financial hardship.*
- One of the Academy BAA courses, Snowsport, was approved by the Board after the course was offered and claimed for funding. The [Board/Authority Authorized Course Requirements and Procedures](#) says: *Schools must have the approval of their Board/Authority prior to*

offering a BAA course, regardless of whether the course has already been approved in another jurisdiction. – AND – 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 and with the following:

- *School Act (if offered by a Board)*
- *Independent School Act (if offered by an Independent School Authority)*
- *Board Authorized Course Ministerial Order*
- *ELL Guidelines – Template for BAA Language Acquisition/Culture Courses*

- The DL Centre’s report card and attendance evidence regarding the curriculum for the Ministry Authorized Physical Education (PE) 10, 11 and 12 courses and the related Academy PE options made it difficult to ascertain if these were separate and distinct learning opportunities. These course plans appeared to share many of the same learning outcomes. After interviewing staff, it was verified that there were extended expectations for the Academy PE courses.
- It was verified that there is no process followed by District staff to ensure students are withdrawn from a course at one school before they were enrolled in the same course in another school. Aligned with the Form 1701 Instructions and as stated in the [DL Funding Policy](#): *Students are not allowed to take the same course at the same time at different schools. A course must be completed, or withdrawn from, before a student can enroll in the same course again”.*
- There was no District policy for student withdrawals per the [Provincial Letter Grades Order](#) which states that assigning a “W” (withdrawal) must be according to the policy of the board, as well as upon request of the parent of the student or student when appropriate.
- During the verification of the DL course claims, it was verified that cross enrolled high school student timetables contained funded support block(s) (XSPBK). Contrary to the reporting requirements, these student claims consisted of an annual educational program of courses with more than eight full credit course claims. The Form 1701 Instructions says: *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. Support blocks are not to be reported for school-aged graduates, adult students or by Continuing Education (CE) or Distributed Learning (DL) schools. In support of students taking distributed learning courses, students cross enrolled in non-DL schools may claim one funded support block per student per school year, as long as the other requirements noted above are met. The student’s annual educational program is capped at a total of eight course claims when a support block is reported for funding.*
- During the verification of the DL course claims it was identified that many of the cross enrolled high school student timetables contained Independent Directed Study (IDS) course codes. In aid of the schools reporting IDS and to ensure IDS is labelled correctly in these instances, the following is provided from the [Graduation Program Order](#) (M302/04): **Definition:** *"independent directed studies" means an area of study in an educational program undertaken by a student that is (a) related to or is an extension of one or more of the learning outcomes established in an educational program guide listed in Ministerial Order 333/99, the Educational Program Guide Order, or in a Board Authorized Course,(b) undertaken pursuant to a plan developed by a teacher and a student and approved by a principal, vice principal or director of instruction, and (c) carried out by the student under the general supervision of a teacher. To align with the definition of IDS, students must have initiated their own area of learning with a plan developed by the student and a teacher and*

approved by a principal. Actual educational options created by District educators to help meet local community needs and provide a mechanism of choice and flexibility for a cohort of students is not aligned with the definition of IDS and likely representative of Board/Authority Authorized (BAA) course options.

Audit Sample Findings

The auditors found that:

- 0.5000 Grade 10-12 school-age FTEs were reported for more courses than taken.
- 0.1250 Grade 10-12 school-age FTEs were reported for past course work used for a current course claim.
- 0.8750 Grade 10-12 school-age FTEs were reported for Ministry Authorized Work Experience 12. 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](#). It was verified that the work component was undertaken prior to enrolment at the DL Centre. To align with Ministry directives regarding student claim eligibility, verifying evidence of student work is undertaken after the enrolment process. Enrolment process confirms student eligibility for a funded educational option, then the methodology confirming attendance in accordance with Form 1701 instructions enables the funding claim.

Recommendations

The auditors recommend that:

- The DL Centre ensure that only eligible course claims are reported for funding and that these claims are in accordance with the Data Collection requirements and related Ministry directives.
- The DL Centre staff ensure that students are enrolled and have the required course selection/enrolment form prior to assigning any portion of a funded education program. In accordance with Sec.82 of the *School Act*, boards are required to provide an educational program free of charge for those student enrolled in an educational program in a school operated by the board. The K-12 Funding General Policy requires that boards ensure enrolled students are eligible for provincial funding. The Form 1701 Instructions requires students to be enrolled and in attendance to be eligible FTE claims.
- Previous student work or marks are not secondary courses and are not to be reported as fundable through the Data Collection process. Items such as credit awarded through equivalency, prior learning assessments, credit recognition, and credit granted are not fundable.
- When students have been withdrawn and re-enroll in the same course, the claim must be aligned with the DL Funding Policy directives ensuring that assessment of the student's past work is not to be used to evaluate re-claimed course progress; and, there is a record of student inactivity for two DL enrolment counts with a corresponding record of attempts made by the DL school to contact the student for that course.
- As required by the Provincial Grade Order for assigning a W (Withdrawal), the District must have an aligned policy and recognise that a withdrawal is upon request of the parent of the student, or when appropriate, the student, the principal, vice principal or director of instruction in charge of the school may grant permission to a student to withdraw.

- The District implement procedures to discontinue the practice of duplicating course claims. Whether in the DL school or standards schools, students are not allowed to take the same course at the same time at two different schools. The DL directives clearly identify that a course must be completed or withdrawn from before a student can enrol in the same course again.
- The District ensure all schools are reporting support blocks in accordance with Ministry directives including the recognition that once a support block is assigned to a student's timetable and claimed for funding through the secondary schools, the student's annual educational program (including DL courses) is capped at eight. To avoid the cap and to enable an annual educational program without limitation, do not report support blocks for funding.
- The District ensure that all newly developed educational options have obtained prior approval through the BAA process before offering these as courses and reporting them for funding, regardless of whether the course has already been approved in another jurisdiction.
- The District ensure that all schools offering Work Experience options are aware of the requirements of these Ministry authorized courses including implementation and adherence to Board established guidelines regarding conduct, supervision, evaluation and participation of eligible students. DL 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 District ensure that only eligible student FTEs are claimed for the funding of Work Experience and that the students are receiving an educational program and instructional component in accordance with all Ministry directives related to Work Experience including evidence of this to verify those claims.
- For all Academies, the District must ensure that all related Ministry directives are in place before the educational option is offered to students and reported for funding, including a financial hardship policy.
- To align with per course funding for Grade 10-12 students, the DL Centre must ensure that all Ministry Authorized courses and any related Academy BAA courses are distinct learning opportunities with discrete learning outcomes and clearly defined course content and expectations.
- The DL Centre follow the DL Active Policy's definition of course enrolment forms ensuring all forms reflect the courses claimed for funding by the DL school and are dated.
- The District ensure that all schools with educational options labelled as IDS are in accordance with the Graduation Program Order's IDS definition and directives.

Auditors' Comments

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