



**Ministry of Education
Resource Management Division**

2018/19 Distributed Learning Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 59 (Peace River South)

South Peace Distributed Learning School

2018/19 DISTRIBUTED LEARNING ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 59 (Peace River South)

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 B.C. 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.

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 DL schools in the Province totalling 9,910.5626 FTEs as at February 2019 for the 2018/19 school year. The South Peace Distributed Learning School at School District No. 59 (Peace River South) reported a total of 20.9375 FTEs for the September 2018 and February 2019 claim periods.

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 DL Agreements, and related Ministry policies.

Description of the Audit Process

A DL audit was conducted at South Peace Distributed Learning School in School District No. 59 (Peace River South) during the week of April 29, 2019. The total enrolment reported at February 2019 was 20.9375 FTEs, of which 118 student files were reviewed.

An entry meeting was held with the Superintendent, Assistant Superintendent and the DL Centre's Principal and Vice Principal to review the purpose of the audit and the criteria for funding as outlined in the Form 1701 Instructions. The audit process was reviewed and the information provided in advance by the Principal about the procedures and processes followed

by the Centre were discussed. The administrators 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.

The audit team worked out of a conference room in Dawson Creek Secondary School located in close proximity to the Principal of the DL Centre. The audit team was provided with a set of computers to use when accessing the Centre's on-line data. Paper records for each student included in the audit sample were located in the work room and additional information was readily available when requested. The auditors sought documentation to determine that the courses claimed met the 'active' attendance criteria and other related Ministry directives by the respective Form 1701 submission dates. Throughout the audit there were ongoing discussions with DL staff to ensure audit team had an understanding of all aspects of the program. The Vice Principal responsible for Career programs was involved to find evidence related to the Work Experience 12 (WEX) and the Youth Work in Trades (WRK) courses offered provided at the Centre. Staff were provided with every opportunity to locate required evidence and all recommended adjustments were discussed with the staff during the course of the audit.

An exit meeting was held with the Superintendent, Assistant Superintendent, Secretary-Treasurer and the DL Principal. At the 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

The South Peace Distributed Learning School was created primarily to provide opportunities and options for the District's Grade 10-12 students who could not, in their school of record, enrol in certain courses unavailable in each of the District's three secondary schools. In the September 2018 and February 2019 claim periods, there were no K-9 students enrolled in the Centre.

Two teachers are assigned full time to the DL Centre and a selection of DL courses are taught by staff from Dawson Creek Secondary. Two additional teachers work off-site: one at Tumbler Ridge Secondary School and one at Chetwynd Secondary School. The Centre does not actively recruit students from outside the District. The majority of students are cross-enrolled in one of the District's secondary schools. Counsellors from each student's school of record are actively involved in the registration process to ensure that course selection is appropriate to the student's graduation plan. Resources and program enhancements required for the courses are provided by the students' school of record.

Observations

The auditors found that:

- South Peace Distributed Learning School followed the District policy to verify that the school age students were ordinarily resident in B.C. along with their parent/legal guardian.
- There was evidence of high student engagement and commitment to completion of the DL courses in which they were enrolled.

- The District does not currently have a withdrawal policy in accordance with the [Provincial Letter Grades Order](#).
- Although the [DL Active Policy](#) and [Form 1701 Instructions](#) state that student activity must represent a minimum of five percent of the course's learning outcomes of each course before meeting the DL attendance requirement, the Centre has a practice of withholding claims until a threshold of 15 to 20 percent of the course work has been undertaken. This is done to help ensure that students are committed to the educational option and achieve a higher rate of retention.
- Students enrolled in WRK courses are not claimed until the courses are completed.
- While most course enrolment forms were signed, dated and current, there were numerous examples where the course selection portion of the registration form was not completed. The DL Active Policy requires that there be: "*A current course selection or enrolment form must list the distributed learning courses reported for funding that meet graduation requirements*".
- There were instances where the courses listed on the course enrolment form differed from those courses claimed. The DL staff were able to clarify these discrepancies.
- Canvas is the student information system used by the South Peace Distributed Learning School. This system provides a relatively comprehensive platform to track and retain a record of courses taken by each student, assignments submitted, teacher comments, quizzes and exams, the dates work was submitted and marked, and records of student-teacher interactions. Yet the data system did not always include the year of the various entries.
- Quizzes and exams were auto-marked. It was identified that the quizzes were auto-marked so that students receive an immediate response to each quiz submitted. Educators then provide additional feedback through the Canvas platform. The quiz marks provide additional data to be used by educators when evaluating student progress. Staff responses were interactive and intended to help students understand how to correct answers. It was verified that the auto-marking process was not without educator oversight. Educator oversight was provided as a second step following the auto-mark process.
- It was verified for assignments that were marked by educators, the teacher marks and comments were delayed by several months.
- Many student records related to career options were missing evidence related to student monitoring and educator evaluation. During discussions with staff and by reviewing additional evidence the auditors were able to verify that students in WEX and WRK courses were monitored but there was no consistent mechanism to ensure visits to worksites were logged in a consistent manor. It was verified that there was a need for the District to implement a consistent process of recording the monitoring to worksites by designated staff to ensure the program requirements were clearly met.
- Where students were enrolled in more than one WEX and/or WRK course, there was limited evidence to verify these were separate and distinct work placement options or activities. At the conclusion of the audit week, the DL Principal and staff were able to provide evidence of differentiated training plans and a template that the DL Centre will implement for ongoing use to help ensure and reflect separate and distinct work placements.
- While all other criteria was met, in some instances work placements in WEX and WRK began before an in-school orientation (including work site safety awareness) took place. This was verified as a District oversight.
- Many of the career based forms and documents were not dated.
- Overall the DL program was run with diligent oversight by the Principal. It was also evident

that the staff embraced the compliance review process as a means of improving practice and ultimately student engagement.

Audit Sample Findings

The auditors found that:

- 0.3750 Grade 10-12 school-age FTEs did not meet the requirements of the DL Active Policy and in accordance with Form 1701 Instructions for submission of substantive activity by the claim date.
- 0.1250 Grade 10-12 school-age FTEs were verified as reported in a consecutive data collection period, contrary to the Form 1701 Instructions (P.12) which says: *Courses encompass only one organized set of learning outcomes. completion of the course's learning outcomes may be over a number of registration periods, only one course is undertaken and therefore eligible for only one funding claim*".
- 0.1250 Grade 10-12 school-age FTEs were re-claimed for an incomplete course. The [DL Funding Policy](#) says: *"For boards to be eligible for funding for the same DL course taken in the same DL school by Grade 10-12 students (including adults) the following conditions must be met:*
 - *If a student has withdrawn from a course or did not complete a course, there must be 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."*

Recommendations

The auditors recommend that:

- The DL staff ensure there is alignment between the courses listed on the enrolment form and those courses claimed for funding as required by the DL Active Policy.
- As all student withdrawals are to be undertaken in accordance with Board Policy, the District create a withdrawal policy consistent with the requirements of the Provincial Letter Grades Order.
- The District and DL staff ensure that no funding claims are submitted for students who have not met the requirements of the DL Active Policy.
- The District ensure only eligible student FTEs are claimed for the funding and that the total number of course claims aligns with the number of courses in which the student meets the attendance requirements in accordance with the Form 1701 directives.
- The DL staff must ensure the accuracy of all funding claims including confirming course work from a previous school year is not used and track student claims to verify there is no duplication of courses.
- The District ensure that all schools providing WRK options are aware of these Ministry authorized course requirements including evidence:
 - that there was the provision of an in-school orientation session prior to placement with an Industry Training Authority (ITA) recognized sponsor;
 - student has a current ITA registration form;
 - school coordinator has registered the student as a youth apprentice with ITA;
 - school coordinator has retained copies of all forms required for registration and retains the student's ITA registration number required for the duration of the apprenticeship including verification of work site WorkSafeBC coverage;

- of a separate and distinct training plan for each of the courses for the student and sponsor created by an educator in conjunction with the ITA sponsor, with the coordinator and sponsor required to keep track of all trade specific learning standards each student has been taught;
- the work based training hours are accrued only after the student is registered as an ITA youth apprentice;
- students are taught and assessed on the curriculum of WRK before they are given WRK credit;
- students are monitored and evaluated by an educator with valid teaching certificate; and
- for recognition of prior work (students working in a trade but not enrolled in a WRK program for up to 240 hours) requirement is for the educator to first validate student's work in trade at the same time the student is registered with ITA, then teach and assess learning standards required for WRK course credit. Claims for WRK based on recognition of prior work must have evidence including validation of work and registration with ITA; there is a sponsor signed work based training report with dates and hours of the prior work sought for ITA recognition; and, there is evidence an educational program was provided.
- The District ensure that all schools offering WEX 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. 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 staff ensure the following requirements are met when all schools, including their DL Centre claim funding for the Ministry Authorized WEX courses:
 - students must have an in-school orientation;
 - there is a plan in place for use by student and employer articulating the skills and areas of knowledge to be developed during the work placement;
 - there must be a duly signed Work Experience Agreement Form;
 - there is evidence that students are at sites where WorkSafeBC coverage is provided;
 - school personnel must monitor students in accordance with Board guidelines;
 - a District staff educator with valid teaching certificate will evaluate the performance of the students and assign final percentages.
- The District ensure that only eligible student FTEs are claimed for WEX and that the students are receiving an educational program with the instructional component in accordance with all Ministry directives.
- The District ensure student workhours undertaken prior to the start of WEX are not used for the work placement portion of the course. Should the District choose not to follow the Ministry Authorized WEX directives, at the discretion of educators, students could be awarded credit in accordance with school determinates but these educational options are not eligible for funding.
- The District and DL staff ensure that funding claims for students who do not meet the requirements of the DL Active Policy related to substantive activity are not submitted.
- The District and DL staff ensure that claims for incomplete courses are not submitted for funding unless there is a record of student inactivity for two DL reporting periods.

- The DL staff ensure there is alignment between the courses listed on the enrolment form and the courses claimed for funding as per the DL Active Policy.
- The District endeavour to ensure DL educators provide students with direct feedback in a timely manner to ensure they are able to progress with teacher support.
- The Career Life Education course outline and related assessment practice be reviewed to ensure clarity and congruence.
- All documentation, forms and student work are to contain complete dates including the data generated by the Canvas program.
- Given the lack of evidence required for the WEX and WRK options identified during the course of the audit, the District be required to schedule a Ministry sanctioned workshop related to Career programs.

Auditors' Comments

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