



**Ministry of Education
Resource Management Division**

2019/20 Continuing Education Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 57 (Prince George)

2019/20 CONTINUING EDUCATION ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 57 (Prince George)

Background

The Ministry of Education conducts Continuing Education audits, in selected school districts, to verify enrolment reported on *Form 1701: Student Data Collection* (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.

Continuing Education centres provide adults who have not graduated from secondary school the option of obtaining a B.C. Adult Graduation Diploma or a regular Dogwood Diploma by taking courses offered through school districts, and effective September 1, 2008 boards that have passed motions may offer graduated adults specific courses tuition-free. In certain situations, school-age students may also enrol in Continuing Education courses.

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 2019/20 school year, boards of education reported a total of 972.2500 full-time equivalent (FTE) Continuing Education students for September 2019. School District No57 (Prince George) reported 215 Continuing Education students or 36.6250 FTEs for the September reporting period.

Purpose

The purpose of the Continuing Education 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 Continuing Education enrolment audit was conducted in School District No. 57 (Prince George) the week of January 27, 2020. The total enrolment reported at September 30, 2019 of 36.6250 FTEs were reviewed.

An entry meeting was held with the Superintendent, Assistant Superintendent, the Continuing Education Centre's Principal, Vice-Principal, Data Clerk and Teacher-Advisor 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 information about the programs offered by the Continuing Education Department was provided. The administrators and the audit team discussed the procedures that would be followed to undertake the audit.

The auditors worked out of the Centre for Learning Alternatives. The audit team followed a process, which gave District staff the opportunity to locate and present additional information when the team found that such evidence was not available in the documentation presented by the

school.

To minimize the likelihood of missing relevant data, the staff was also given the opportunity to seek further information on all student claims when there was a discrepancy in the FTE calculation. Throughout the audit the Principal was kept apprised of any issues. A mid-week meeting with the Superintendent was also held to discuss the findings.

An exit meeting was held with the Continuing Education Centre's Principal, Vice-Principal, Superintendent and Assistant Superintendent. At the 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/Certification Branch (TRB).

Description of the Programs

The Continuing Education (CE) program for Prince George is located in the Centre for Learning Alternatives (CLA). The CLA facility encompasses many programs including Distributed Learning, Provincial Resource Programs, and a number of Alternate Education Programs all under one administrative team. In addition to the CE program offered at this site, there are also students enrolled in CE at the Prince George Regional Corrections Centre (PGRCC) and Baldy Hughes (a private rehabilitation facility). There were 21 students claimed for funding from PGRCC and 34 from Baldy Hughes. All courses are offered on a self-paced basis with 3.5 teachers assigned to the District's CE program where students are encouraged to work on site at the CLA. A teacher goes to PGRCC a half-day a week and the same teacher goes to Baldy Hughes one day per week.

Student enrollment and intake is carried out on a continuous basis. A teacher/academic advisor meets with all student registrants and conducts assessments of their level of academic readiness. Students who require academic upgrading are placed in one of several available levels of English and Mathematics skills development courses. Students who are assessed as having the requisite academic skills are enrolled directly in high school completion courses. Most students plan to seek the Adult Graduation Diploma, but the B.C. Certificate of Graduation is also available.

Observations

The auditors found that:

- The operation of the District's CE facility at the time of the audit appeared to have deviated from the [Form 1601 Public School Data Verification Instructions](#) which Districts are to follow when reporting a facility as a Continuing Education site. These instructions state: *"To be reported in a CE school, students must be enrolled in a course offered by the CE school. Instruction must be provided by TRB certified staff whose FTE position is assigned to the CE school. Students in a face to face setting must be in a classroom consisting of CE students only."*
- A significant portion of the recommended adjustments were for courses claimed by the District for students at PRGCC and Baldy Hughes. At the time of the audit the information provided indicated a lack of engagement and low completion rates for these students. There was also evidence that the students at PRGCC and Baldy Hughes were not provided with

courses aligned with the current graduation requirements nor with the eligibility or educational requirements for courses such as Work Experience and the Career Life options. As the attendance requirement is for evidence students have undertaken a portion of the course work (10%) by the claim date, many of the documents reviewed at the time of the audit were the same for each student and often difficult to verify what actual course work was undertaken. There was limited to no alignment with the unique curricular requirements for the funded courses.

- The CE Centre’s Career Life Education curriculum plan (labelled by the Centre as CLE12) submitted to the auditors did not fully reflect the curricular competencies and learning standards as set out by the Ministry. In many instances there was no understanding or evidence of the required components. There was also an apparent misinterpretation of the Career Life Exploration’s 30 hours or more of substantive experimental learning component. This learning is part of the curricular competencies for Career Life Connections (CLC) not Career Life Education. The Career Life Exploration 30 hours was viewed by the CE staff as aligned with their CLE12 course claims to additionally meet the eligibility requirement when reporting Work Experience 12 (WEX12) claims.
- The CE Centre has not developed any Language Arts courses at the Grade 11 level and continued to use the English 11 curriculum labelled/reported as Literacy Studies 11. The curriculum is no longer credit eligible for the current graduation program requirements.
- It was noted that many documents reviewed by the audit team did not align with current Ministry requirements, including:
 - the lack of standardized attendance evidence per the Adult Funding Policy (i.e., pre-audit, auditors were advised District uses 10% course completion for their CE attendance requirement);
 - remitting course work as an ‘activation assignment’ without evidence to indicate where, in each of the individual course’s learning standards, the 10% completion of learning was met;
 - misalignment with learning standards and curricular competencies for the Career Life options;
 - worksheets had Physical Education 12 manually crossed out and replaced with Active Living 12 with no evidence of the new curriculum for Active Living 12.
- A record of marks, assessment evaluation and work samples were requested for all the claims representing Active Living 12. The CE staff provided the team with a binder containing evidence for each student claim. All evidence including marks appeared to be similar. The electronic files provided for each student contained only a “questionnaire” (a self survey). None of the information contained evidence to verify 10% of the required learning standards had been met.
- In a number of instances assessment of prior learning was used as evidence of 10% of the course requirements. Students identified as taking English 11 and English Studies 12 wrote part of an outdated provincial English 10 exam, which was submitted as evidence of 10% of the course requirement for English 11 and English Studies 12. There was no evidence of current Language Arts curriculum for the graduation requirements, nor are prior learning assessments funding eligible (Ref. Form 1701 Instructions: “*Items that are not secondary courses, such as credit awarded through equivalency, prior learning assessments, credit recognition, credit granted, tutorial time and teacher consultation, are not fundable*”).
- In many cases, the records submitted to the auditors were not supported by actual data findings.

- 0.3750 Grade 10-12 school age and 3.8750 non-graduated adult FTEs were reported for courses where the attendance requirements were not met. 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.*”
- 0.2500 Grade 10-12 school age FTEs were claimed by the CE centre for Youth Train in Trades (TRN) courses at the College of New Caledonia. The student was a school age graduate when the September 2019 claim was made with evidence identifying that the student began the TRN option in October 1, 2018 and completed June 21, 2019. There was no evidence provided by the CE Centre to clarify why a partial TRN option was reported for this student in the 2019/20 school year. Nor was there any evidence of any educational involvement with the CE Centre during the May 4, 2019 to September 30, 2019 claim period to support a two course claim for this ten course program which was initiated prior to October 2018.
 - Reporting school age students returning after graduation to begin the post-secondary courses does not meet the current funding policy. The [Post-Secondary Transition Programs for Funding Purposes](#) Policy and the [K-12 Funding - General](#) Policy, provides the eligibility directives for these funded options.

In accordance with the Post-Secondary Transition Programs for Funding Purposes Policy: “*Post-secondary transition programs are educational programs that combine secondary and post-secondary courses, and that lead to Grade 12 graduation as well as help students make smooth transitions to further education or training. **The Ministry of Education recognizes post-secondary courses for funding purposes if they are part of the school-age students' planned programs of study leading to graduation.** “*Secondary schools are not always able to offer the full range of courses or programs that **help prepare students for specific occupations.** For this reason, the Ministry of Education encourages school districts to **improve transition success for students by collaborating with post-secondary institutions and industry associations to offer transition programs that lead to trades certification or post-secondary credentials.** Students begin **taking the post-secondary courses that are part of their transition program during their Grade 11 or Grade 12 year.**”**

In accordance with the K-12 Funding-General Policy: “*Courses taken in BC outside the public school system (through colleges, post-secondary institutions, private organizations, etc.) **are not funded unless permission and support is arranged through the Board of Education, and the course is taken for credit towards grade 12 graduation.**”*
- 0.2500 graduated adult FTEs were ineligible claims. It was verified the graduated adults were reported for courses not part of the [Tuition Free Courses](#). Per the Adult Funding Policy: “*Effective Dec 4, 2014, boards of education may receive funding for adult students who have graduated and who enroll in any of the literacy courses offered at continuing education centres, K-12 schools or through distributed learning. See the list of [tuition free foundation courses](#).* To be eligible to claim for funding, the board of education must

- ✓ *adopt a motion that it intends to provide tuition-free education to graduated adults in Continuing Education and/or K-12 schools, and notify the ministry that it has done so, and*
- ✓ *ensure that [graduated students](#) are ordinarily resident in B.C., enrolled in the district, and under the supervision of, assessed and evaluated by an employee of the Board of Education who is certified by the Teacher Regulation Branch.”*
- 0.6250 non-graduated adult FTEs were reported for courses not part of the current curriculum towards graduation. The Adult Funding Policy states that: *The adult students must be enrolled in eligible courses that lead to the B.C. Certificate of Graduation or the B.C. Adult Graduation Diploma.*
- 1.8750 non grad adult FTEs were claimed for Work Experience 12 (WEX12). 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 [Guide for Ministry-Authorized Work Experience Courses](#). In accordance with the directives specific to the Ministry Authorized WEX12A/B, 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.”***

Overall the Elective Work Experience Courses and Workplace Safety Policy specific to WEX12 eligibility says:

*“Work experience is defined in legislation as “that part of an educational program that provides a student with an opportunity to participate in, observe or learn about the performance of tasks and responsibilities related to an occupation or career.” **The goal of work experience is to help students prepare for the transition from secondary school to the world of work, and to help students connect what they learn in the classroom to the skills, knowledge, and attitudes needed in the workplace.***

*In order to be reported as a Ministry-authorized Work Experience 12A or 12B course, **the work experience must be supported and monitored by the school and consist of authentic workplace experiences.***

In most cases, Ministry-authorized Work Experience 12A and 12B consist of school-arranged, non-paid placements. Paid employment can be used to satisfy the requirements of Work Experience 12A/B only when it coincides with the student's documented career plans and is supported and monitored by the school.”

To meet the eligibility requirements for the WEX12 course claims, in addition to the above directives, the following is required to align with the policy, legislative order and the WEX12 guide including:

- evidence Board established guidelines are in place regarding conduct, supervision, evaluation and participation of students reported as taking funded WEX12 options;
- informing workplace sponsors about the intent of the work experience placement;
- remind all employers of their responsibility to orient the student to workplace safety practices;
- evidence of a training plan signed off by the educator, student, parent (if applicable) and employer that articulates the skills and areas of knowledge to be developed during the placement. Training plans are to outline learning goals for skill development and refinement for the WEX12 placement and demonstrates a student’s progress through the learning standards for each of the WEX12 courses the student undertakes;
- familiarize the student with the responsibilities and expectations associated with participating in a work experience placement by providing an in-school orientation

covering general workplace safety awareness, issues and practices for their specific placements and/or employment sector;

- endeavour to place the student in appropriate situations;
- ensure the workplace atmosphere is free of exploitation and harassment;
- student has a duly signed WEX12 Agreement Form which confirms employer will supervise the student during the WEX12 placements, the terms of the placement, location of the worksite and anticipated dates and time of the placement;
- there is evidence student is covered by WorkSafeBC at the worksite;
- evidence school personnel have monitored student in accordance with board guidelines;
- educator with valid teaching certificate has evaluated the student using established criteria measuring student achievement in relation to the curriculum standards for each WEX12 course and has assigned a percentage

Should District schools chose to disregard these directives, credit could be awarded to students for WEX12, if so determined by District educators, but these instances would not be funding eligible.

Recommendations

The auditors recommend that:

- The District's Continuing Education Centre staff only report funded courses where the student has actually taken the eligible course and has met the attendance requirements (10% completion of the course's actual learning standards).
- The District staff ensure only eligible student FTEs are claimed for WEX12 and that the students are receiving an educational program and instructional component in accordance with all Ministry directives related to WEX12 including evidence to verify those claims.
- The District staff review their operational procedures specific to Career options and WEX12 claims including:
 - Ensuring there are Board established guidelines regarding conduct, supervision, evaluation and participation of students in place and followed by those staff members tasked with the provision of WEX12 to eligible students.
 - Student FTEs claimed for career program courses including WEX12 are receiving an educational program and instructional component in accordance with Ministry directives and current learning standards.
- The District's Continuing Education Centre staff ensure only authentic courses and those courses currently eligible for credit are reported for funding.
- Courses claimed for funding are to have evidence of meeting the attendance requirement for each separate and distinct funded course. While recognition of course credit may be assigned to the student, the same course work cannot be used for two funded course claims.
- The District's Continuing Education Centre staff ensure that all curriculum offered to students fully meets current Ministry Learning Standards as outlined in the respective Program Guides.
- The District pass a motion that it intends to provide tuition free education to graduated adult students to align with the Adult Funding Policy's statement that: "*Boards of Education that have adopted motions may offer specific tuition-free courses to adult students who have graduated*". There was no evidence at the time of the audit that the Board had ever passed such motions.
- The District's Continuing Education Centre staff ensure that no segment of obsolete courses

be used to demonstrate learning, including the 10% course completion to meet an attendance requirement.

- The Continuing Education Centre ensure the accuracy of all records related to student course claims for funding and cease the process of claiming funding for credit achieved through prior learning assessments.
- The District review its delivery model at both the Prince George Regional Correction Centre and Baldy Hughes to ensure those students reported for funded courses are receiving eligible course credit (and for graduation as applicable); have processes in place to ensure student achievement; and, receive an educational program that is planned, delivered and assessed by a certified TRB teacher.
- The District be scheduled for a return audit to ensure practices identified during this audit are put into practice and aligned with the Ministry directives, including ensuring the operation of their CE facility is in accordance with the Form 1601 definition of a Continuing Education facility; only provide current course offerings associated with the current graduation program requirements; and, ensure students are provided with the learning standards for the funded courses claimed including WEX12 and the Career Life options.

Auditors' Comments

The auditors wish to express their appreciation to the District and program staff.