



**Ministry of Education  
Resource Management Division**

**2019/20 K-12 Regular Enrolment Audit**

**AUDIT REPORT**

**SCHOOL DISTRICT No. 36 (Surrey)**

## **2019/20 K-12 REGULAR ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 36 (Surrey)**

### **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 2019/20 school year, boards of education reported a total of 542,440 FTEs in Kindergarten through Grade 12. School District No. 36 (Surrey) reported a total of 72,322.1875 FTEs or 72,500 students, including 18,563 students for English Language Learners (ELL) and 3,115 students for Indigenous 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. 36 (Surrey) during the week of March 9, 2020. The schools audited were:

- North Surrey Learning Centre-Alternate (NSLC)
- Guildford Learning Centre-Alternate (GLC)
- Education Services-Alternate (ES)
- Cloverdale Learning Centre-Alternate (CLC)
- City Central Learning Centre-Alternate (CCLC)

While the total enrolment reported by the five Alternate Education Programs on September 30, 2019 was 967.2500 FTEs of which 559 student files were scheduled for review, due to the absence of the necessary evidence and delays in it being provided, 229 Alternate Education

Program student claims were reviewed as well as 80 Indigenous and 15 English Language Learning supplemental claims. 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 on March 9, 2020 with the Superintendent, each Alternate Education Program's Principal, Assistant Superintendent, Administrative Assistant, Director of Instruction, two District Principals, District School Psychologist, Secretary-Treasurer, Career Facilitator (school-based) and a Teacher-in-Charge to review the purpose of the audit and the criteria for funding as outlined in the Form 1701 Instructions.

The audit team reviewed student files, interviewed staff, and concluded on their observations. The audit team followed a process with each facility which gave administrators and program staff the opportunity to locate and present additional evidence when the team found that such evidence was not available in the documentation presented by the school.

An exit meeting was held on March 13, 2020 with the Superintendent, each Alternate Education Program's Principal, Director of Instruction, Secretary-Treasurer and District Principal. At the exit meeting the auditors presented their preliminary results and clarified any outstanding issues.

The audit included the enrolment reported in the 2019/20 school year. The areas audited were:

- September 30, 2019 enrolment and attendance
- Ordinarily Resident
- Alternate Education Programs
- School-Age Grade 10 to 12 claims
- Adult Student Claims
- English Language Learning (ELL) Supplemental Claims
- Indigenous Education Supplemental Claims
- Career Claims including Post-Secondary Transition Programs with Post Secondary Institutions and Industry Association partners

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

## **Observations**

The auditors found that:

- 13.0000 school-age Grade 10 to 12 FTEs and 0.1250 non-graduated adult FTEs were not enrolled or attending at the Data Collection claim date of September 30, 2019.
- 37.0000 school-age Grade 10 to 12 FTEs reported in the Alternate Education Program schools were without evidence to meet the requirements of the [Alternate Education Program Policy](#). The policy states...“ *The 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. These education programs provide support to students through differentiated instruction, specialized program delivery and enhanced counselling services based on students' needs. 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.*

- Audit team was advised that due to the size of the District and their continuous growth in student population it was challenging to find alternatives for students because of the lack of school space. The District staff advised that they will explore **alternative** ways to support students requiring one or two courses towards graduation and students with attendance issues not requiring the intensive supports of an Alternate Education Program.
- The majority of the required student learning plans (SLPs) were created in January and February 2020 for the audit. While all files presented contained a template for gathering information required to develop an SLP, these were not done/completed.
- Overall, the Alternate Education Programs had some consistency with their intake process/interviews which provided general demographic and historical information about the student. This was intended as the start point for the development of an SLP, yet beyond the intake process there was no evidence of individualized student planning aligned with an Alternate Education Program. Nor was there evidence that returning students had updated/annually reviewed planning supports.
- Many SLPs contained inaccurate dates. (i.e., the wrong year June 2020).
- The Alternate Education Programs had generic handouts in the student files which described what services were available yet additional services specific to each student were not identified. There was no indication of outside services on student SLPs or who was providing the services and when.
- For all the Alternate Education Programs, forms and documents were not dated and/or signed as applicable.
- Attendance evidence was poor with contradictory documentation. There was no evidence of a mechanism/methodology to accurately record student attendance.
- There was little to no evidence of interaction logs/schedules. Those in evidence often did not identify who was maintaining the logs. There was no evidence of specific dated contact with the student regarding services.
- The majority of transition planning was specific to graduation. Exit plans, when available, referred to completion of courses or an indication of the student's goal to return to a traditional school.
- Additional services beyond those provided in a traditional school setting were not clearly articulated in the majority of files reviewed. The SLPs, IEPs and entry interview information were often silent on student issues or why they were referred to an Alternate Education Program.
- While a large number of students were enrolled at these facilities because of poor attendance, there was no recognition of the purpose for attending the facility and no link to specific strategies to ensure achievement and an opportunity for success or improvement.
- The Alternate Education Programs frequently used continuous learning for many of their students, yet the evidence did not capture the strategy or plan of what supports/adaptations the student required to achieve their graduation plans. In some

instances, students were continuing with the majority of their courses begun in the previous year. The Form 1701 Instructions say: “*Courses encompass only one organized set of learning outcomes. While 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.*” Those Alternate Education Program facilities reporting the student claims based on continued learning in the same course(s) are not eligible if it is the continuation of learning from a previous claim.

- At North Surrey Learning Centre, the IEPs in the sample met the special needs requirements including measurable goals and objectives, and measurement of student progress. Specific to Alternate Education Programming, there was a list of additional services but no individualized evidence of a transition plan nor dates of service provision.
- At North Surrey Learning Centre and Guilford Learning Centre the SLP was completed by the students without input from staff and lacked information regarding objectives, services, measurement of student progress, or transition planning.
- At Guilford Learning Centre:
  - The SLPs, when dated, were identified as Term 1 (2019) or Term 2 (2020) but no specific date was provided to indicate when the actual plan was created.
  - It was confirmed that students were referred to the Alternate Education Program only for the completion of one or two courses required for graduation. These students did not require or receive the differentiated instruction, specialized program delivery and enhanced counselling services of an Alternative Education Program.
  - The IEP’s were not current. (i.e., dated 2014, 2016 and 2018) contrary to the Special Needs Guidelines and Form 1701 Instructions.
  - At Guilford Learning Centre and Education Services there was evidence of residency documentation and an intake process.
- At Education Services:
  - Every student was reported with a “placeholder” course as at the Fall Data Collection date. All returning and new students were enrolled in an Outdoor Education course and an XAT (non-funded) block. The facility’s administrator stated that : “*students do not know what programs they want to take*” and as a result all are reported with a placeholder course for the month of September which results in full FTE funding. In October, the Outdoor Education course was dropped and revised timetables created. The facility’s administrator contended that only in circumstances where Outdoor Education is required for graduation is it reported or alternatively the Outdoor Education option is converted to a Physical Education course code. There was no evidence provided of either practice.
    - In this instance only, there were no recommendations for adjustments when there was evidence of educational programming as well as services and supports beyond those provided in a traditional school. The Form 1701 Instructions says: “*In order to calculate the Full-Time Equivalent for all secondary students enrolled in Grades 8-12, SU and GA report the total number of eligible courses. 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*”.
  - The students with special needs designations did not have evidence of specific strategies related to their designation nor evidence of a program focused on the educational, social

and emotional issues for students which were no different from that of a traditional school.

- There was no evidence of referrals to outside agencies.
- In an effort to provide students new to Canada with immediate service, teacher contact and instructional continuity, these students were enrolled in the Education Services Alternate facility. These students, classified by the District as English Language Learning (ELL) students, and their families start at the Welcome Centre where the staff facilitate student integration into the Surrey School Board system and community. It was verified through the audit process that student placement in the Alternate Education Program was a placement error. There was no intention for any of these immigrant students to receive an Alternate Education Program nor to be claimed for Alternate Education Program funding. The District stated they will amend this practice immediately and find an acceptable substitute placement/process for new immigrant students in the future.
  - In this instance only there was no recommendation for adjustment of the alternate funding as the students would have received 1.0 FTE in a traditional school placement.
- The **LIFT** (Learning Innovations for Teens) program at City Central Alternate was created as a partnership with the local high school Kwantlen Park Secondary for students who are not experiencing success due to attendance issues. The students are enrolled for one semester at the Alternate Education Program facility and then return to the secondary school.
- 19.2500 school-aged Grade 10 to 12 and 0.3750 non-graduated adult FTEs were funding claims ineligibly reported through Form 1701. It was verified that the students claimed through the Alternate Education Program were students enrolled in a Provincial Resource Program (PRP). The Form 1701 Instructions requires that students enrolled in a PRP for three months or less are to be claimed by their regular school **through the funded PRP Agreement**. For students enrolled for longer than three months they **are reported in the PRP facility in which they are enrolled as at September**. These students are not to be reported on Form 1701.
- 1.0000 school-age Grade 10 to 12 FTEs reported for funding was not ordinarily resident in British Columbia with their parent/guardian as required by the *School Act* and in accordance with the [K-12 Funding General Policy](#) and the [Eligibility of Students for Operating Grant Funding Policy](#). 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*”. From the Eligibility policy is the following information about guardianship:
  - *A person cannot become a child’s guardian by agreement except if the person is the child’s parent, or if guardianship is transferred by agreement under the Adoption Act, or the Child, Family and Community Service Act [Section 50 of the Family Law Act]*
  - ***A person may be appointed as a child’s guardian:***
    - ***by court order,***
    - *in a will made in accordance with the Wills Act (alternatively, a guardian may be appointed by prescribed form – see section 27 of the [Family Law Act Regulation](#)),*
    - *by a guardian who is facing terminal illness or permanent mental incapacity, provided the appointment is made in the prescribed form (see section 27 of the [Family Law Act Regulation](#)).[Sections 51, 52, 53 and 55 of the Family Law Act]*

- 0.2500 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*”. The Alternate Education Programs currently do not have an attendance determinate for eligible adult learners in accordance with the Adult Funding Policy.
- 0.1250 non-graduated adult FTEs was verified as a duplicate claim. The student was reported for the same course twice.
- The non-graduated adult student evidence was inconsistent from facility to facility and lacked the requirements aligned with adult funding including no evidence of course enrolment forms nor of planning towards graduation.
- Many students undertaking an eligible career option lacked evidence of involvement or service provision for an Alternate Education Program. The notes and information provided for students were solely from the career facilitators with no evidence of educational programming by the Alternate Education Program staff.
- Several students reported as receiving an Alternate Education Program were verified as taking only WEX12. These students were not attending nor receiving the required services aligned with the Alternate Education Policy. In these instances, it was unclear why these students were not reported by the secondary schools if other than to generate a full FTE for a course claim.
  - The District has a clear process for reporting WEX12A and WEX12B with the same employer. Alternate Education Program facilities did not follow the District process for undertaking WEX12B courses.
- Eight students reported as receiving an Indigenous Education Program and/or Service were verified not to have received any services and/or support in accordance with the [Form 1701 Data Collection Instructions](#) and the [K-12 Funding-Indigenous Education policy](#). There was no evidence these students received any supplemental services aligned with the directives.
  - It was verified that:
    - Two claims were for students enrolled in a PRP program and not eligible for districts to report through the Form 1701 process and did not receive the supplemental services.
    - One claim was for a non-resident student ineligible for supplemental funding.
    - The District’s programming was staffed with youth care workers, aboriginal support workers, inner city student support workers and Indigenous graduation advocates assigned on a pro-rated basis according to student population.
    - There were a number of teams that provided intervention as needed; transition teacher teams of five members, district behavior specialist dedicated to Indigenous students, a cultural team that worked in schools for periods of one week at a time.
  - Evidence to verify Indigenous services and supports was inconsistent, nonspecific and often not dated.

## **Recommendations**

The auditors recommend that:

- District staff ensure students reported as receiving an Alternate Education School Program are in attendance at the claim date and are receiving the required service provision in accordance with the [Alternate Education School Program Policy](#) and that:
  - District staff investigate the current practice within the Alternate Education Program facilities to ensure alignment with the educational offerings identified in the Alternate Education Program Policy. There is to be evidence to verify students receive support services designed to meet their individual educational, social or emotional needs which they would not receive in a traditional school program.
  - District staff refrain from reporting FTE claims not aligned with the enrolment requirements of the Alternate Education School Program Policy and the Form 1701 Data Collection instructions.
  - Alternate Education Program staff amend their current practice of routinely reporting students until it has been verified that only those individuals who are in attendance and receiving/scheduled for the appropriate service provisions specific to an Alternate Education Program are claimed at the Data Collection date.
  - Alternate Education Program staff ensure there is evidence of the service in addition to what is provided to the general school student population. The Alternate Education Program facilities must have evidence of service provision for each non-graduated school age student reported, including verification of who is or will provide the service supports, and when the service supports have/will be provided.
  - Alternate Education Program staff review the Alternate Education Program Policy procedures for SLPs to ensure each SLP clearly defines the objectives for the student, additional services provided as required, progress made, and any transition planning along with dates and appropriate signatures verifying service for each school year claim.
  - District staff review the process for the development of IEPs for designated special needs students enrolled in Alternate Education Program Schools ensuring these plans align with the special education guidelines.
  - District staff review the systems used by all Alternate Education Program facilities that record support services to students ensuring there is the ability to track attendance, services, and as verification the student service provision requirement of the Alternate Education Program Policy is met.
  - District staff ensure the process of referral of students to the Alternate Education Programs is consistent with the District screening process and procedures.
  - District staff cease the practice of reporting students as receiving an Alternate Education Program while enrolled in a PRP program.
  - District staff undertake a review of the operational processes of the Education Services Alternate facility to determine whether this is a program that meet the requirements of the Alternate Education Program Policy.
    - Education Services cease using “placeholder” options; and that the staff ensure appropriate and effective educational programming is undertaken for all students which leads to graduation and includes additional services as required in accordance with the Alternate Education School Program Policy.



- District staff cease the practice of enrolling new immigrant students in the Education Services Alternate Education Program and ensure there are suitable alternatives for placement in the District's standard/traditional schools.
- District staff investigate 'alternative' methods of curriculum delivery and support for students who require course completions towards graduation or modified programming for their learning success (including the LIFT program), but do not meet the requirements for enrolment in an Alternate Education Program.
- District staff examine the large number of special needs designated students placed in Alternate Education Programs to ensure student needs are met and servicing is in addition to what the student would receive in traditional school environments.
- Alternate Education Program staff refrain from repeating course claims from previous school years, work to engage students towards successful course completion; and, adhere to the Form 1701 Instructions specific to completion of the course's learning outcomes over a number of registration periods.
- Only students who are ordinarily resident in B.C. in accordance with Ministry directives are to be reported for funding.
- District staff ensure, in accordance with the [Elective Work Experience Courses and Workplace Safety Policy](#) and the [Guide for Ministry-Authorized Work Experience Courses](#), that 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 with evidence to verify those claims including:
  - For all WEX12A and WEX12B options, with the same employer, each course has a separate and distinct 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 WEX placement and demonstrates a student's progress through the learning standards **for each of the WEX courses the student undertakes.**
- Only those adult claims that meet the requirements of the Adult Funding Policy are to be reported for funding including evidence to verify the claims.
- The District be required to undertake a Ministry sanctioned workshop specific to Alternate Education Programming and be scheduled for a return audit 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.