



**Ministry of Education
Resource Management Division**

2019/20 K-12 Regular Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 41 (Burnaby)

2019/20 K-12 REGULAR ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 41 (Burnaby)

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. 41 (Burnaby) reported a total of 23,739.7194 FTEs or 23,569 students, including 5,377 students for English Language Learners (ELL) and 713 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. 41 (Burnaby) during the week of January 27, 2020. The Alternate Education Program schools audited were:

- Take a Hike Secondary Program-Alternate (TAHS)
- Burnaby Youth HUB-Alternate (HUB)
- Outlook Secondary Program-Alternate (OSPA)
- Schou Education Centre-Alternate (SCHOU)
- Cariboo Hill Alternate Secondary (CHAS)
- Royal Oak Secondary-Alternate (ROSA)

The total enrolment reported by the Alternate Education Program schools on September 30, 2019 was 175 FTEs, of which 149 student files were reviewed. The audit was extended outside the sample when district-wide issues were identified.

An entry meeting was held on January 27, 2020 with the Superintendent, two Assistant Superintendents, Assistant Superintendent-Human Resources, each Alternate Education Program Facility's Principal, Manager of Information Technology, Secretary-Treasurer, three Directors of Instruction, and the District Principal Learning Pathways 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 which 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.

An exit meeting was held on January 31, 2020 with the Superintendent, two Assistant Superintendents, each Alternate Education Program School's Principal, four Directors of Instruction and the Manager of Information Technology. 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
- Adult Student Claims
- Indigenous Education Supplemental Claims
- Reciprocal Exchanges
- Post-Secondary Transition Programs with Post Secondary Institutions and Industry Association partners
- District Created Academies

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:

- Alternate Education Program teachers, counselors and administrators worked diligently with the audit team and demonstrated their dedication and commitment to the audit process with timely and accurate information.
- The staff were committed to helping Alternate Education Program students find success and providing "wraparound" support to students who were struggling with emotional and/or academic challenges.
- Many of the Alternate Education Program Facilities were able to demonstrate their ongoing endeavors to reach out to community stakeholders in order to develop partnerships that provided enhanced services to the students.

- 16.0000 non-graduated school age FTEs were verified as not attending an Alternate Education Program and did not receive support based on the students' needs. In order to be eligible for a funding claim, the students must be enrolled and in attendance as at the claim date.
- 36.0000 non graduated school age 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.*
- There was evidence students reported as enrolled and attending an Alternate Education Program facility were receiving their education in a secondary school with support blocks representing 'Alternate', as well as students receiving their education from a Continuing Education Centre.
- At the Burnaby Youth Hub Alternate facility, the tracking records clearly demonstrated multiple efforts to engage students.
 - The District Learning Pathway document (one of three referral processes), provided thorough information that reflected each students' current status and history.
 - Student Learning Plans (SLPs) required further details to identify the educational, social and emotional learning requirements of each student as well as specifying how these supports would be offered.
 - There was limited evidence to support timelines or if services were provided, as the various forms were often not dated or signed.
 - Staff were able to describe the student services and what was required for individual student's educational, social and emotional needs indicating an understanding of the circumstances and requirements for each of their Alternate Education Program students.
- At Royal Oak Secondary Alternate facility, the counsellor was knowledgeable, providing records and informative background information.
 - Counsellor records included chronological timelines, events and appointments.
 - There was a lack of consistent, detailed documentation in the SLPs to identify the objectives for the student goals, additional services, and progress made. Nor were exit strategies or transition plans formulated.
 - The SLPs reviewed were not signed or dated by intake meeting participants, including students/parents.
 - Updated SLPs did not contain specific information for each area of the SLP which was revised.
- At Schou Education Centre only Grade 12 students were enrolled. It was confirmed during the audit that all students in this Alternate Education Program were also enrolled in the

Burnaby Continuing Education (CE) facility. Which is contrary to the Form 1701 reporting directives which say: *“School-aged students in Grades 10-12 or SU enrolled in a Continuing Education School may be reported in more than one school operated by a Board, except if enrolled in an Alternate school”*. Non-graduated school age students reported in the Alternate Education Program cannot be reported in a CE centre. The Alternate Education Program facility paid \$750 to the District’s CE Centre for the “seat”.

- Of the 25 students selected for audit in this facility, 21 of the student claims were recommended for adjustment. For these student claims there was no evidence of the required services nor was there evidence the students were provided with their educational program by the Alternate Education Program staff. It was verified that all curriculum was taught and evaluated by the CE teachers.
- Given the students were also enrolled in the CE centre, they adhered to the same schedule as the other CE students and were not able to begin their courses until September 24, 2019 for the first semester and January 13, 2020 for the second semester.
- One student reported as receiving an Alternate Education Program was enrolled in the CE facility’s Night School.
- There was minimal evidence of enhanced counseling available for a select few students. Four students were confirmed as receiving one academic course from the teacher/counselor at the Alternate Education facility and also had counseling from this individual.
- Take-a-Hike Alternate was an excellent example of an Alternate Education Program. The District process to enrol students in this program included four pathways: through the District intervention process; parental request through school personnel; secondary school administrator referral; and, student self-referral. A number of services were evident throughout, including but not limited to: art therapy and group therapy on a weekly basis; a substance abuse/healthy living program which included units on dealing with stress, exploring reasons for substance abuse, mental health literacy, sleep deprivation; vaping; and naloxone training.
 - This Alternate Education Program facility model was founded on four principles: academics, counselling, adventure and community.
 - Evidence contained the requirements verifying Alternate Education Programming for each student.
 - SLPs contained clear objectives for the school year, articulated student goals and transition plans.
 - Additional services were well documented with dates of service and were fully aligned with student attendance records.
 - Specialized program delivery and enhanced counselling services were evident.
 - Overall documentation and evidence provided was consistent and commendable.
- At Cariboo Alternate facility all enrolled students were cross enrolled in a secondary school with the students attending two support blocks referred to as “alternate”. Evidence verified an ‘alternative’ method of curriculum delivery and support for these students.
 - With the exception of one student, there was no evidence students received the required programming and supports aligned with the provision of an Alternate Education Program.
 - Students frequently self-referred.
 - An education assistant was assigned to two blocks labelled as “alternate class”.

- The teacher had a full-time teaching assignment at the secondary school with two teaching blocks dedicated to ‘alternate’ support.
- The description of these labelled blocks states the teacher will provide opportunities for students to work on their core academic subjects and they will mostly work at their own pace. It states the goal of the alternate class is to help students catch up on academic courses that they were unable to complete in the past, so the students can return to mainstream classes. Some program content is provided by the regular classroom teachers at the secondary school. The teacher creates/modifies curriculum for students that need to learn in different ways: using workbooks, inquiry projects or a combination of both.
- At Outlook Secondary Alternate facility all students had been classified with a low incidence designation for Intensive Behaviour Interventions/Serious Mental Illness (Code H). This facility shares space with two outside agencies who work with the students to access enhanced community resources. These agencies provided integrated case management notes as evidence of the ongoing support for the students.
 - Students in this facility were engaged in three or more courses.
 - Student attendance was closely monitored by the staff.
 - In several instances there was a disconnect between the goals in the IEPs to align with the special needs designation. Upon request evidence was provided supporting the Code H claims in accordance with the Special Education Manual of Policies, Procedures and Guidelines.
- 23 student claims reported as supplemental Indigenous Education 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](#).
 - One student claimed as receiving an Indigenous Education Program/Services was not enrolled and attending as at September 30, 2019, nor was there evidence student received any supplemental program/service.
 - Approximately 20% of the students enrolled at the Alternate Education facilities were reported as Indigenous.
 - The District had a brief outline of an annual plan for Indigenous support. The annual plan for Indigenous support for the Alternate Education Programs applied to only four of the Learning Pathways group of schools. The amount of time the Indigenous support teacher was given to work with all four facilities was approximately 0.1 FTE or approximately 2.5 hours a week. District staff advised that this can be flexible to accommodate special activity days.
 - There was no evidence of Indigenous support service for the Learning Pathways group of schools. The evidence did not align with the District’s annual plan.
 - Royal Oak Alternate:
 - As evidence of Indigenous supplemental services/supports, Royal Oak Alternate advised there was a school-wide art class scheduled for three days in September. The information provided to the auditors identified all students attended the art class yet attendance records showed only three students reported as receiving Indigenous supplemental services and supports were attending school for one (or more) of those three days.
 - For a cultural event, teacher connection, and tutorials every student was scheduled in the same block of time. While the event was scheduled for January 13, 2020 there

- was only one student in attendance even though the evidence provided identified all students undertook this service.
- On the last day of school, before the winter break, there was one consultation with school staff on December 17, 2019.
 - There was no evidence the students received a continuum of substantive learning experiences and/or support services throughout the school year, nor that there were services in addition to any other programs and services to which the student was eligible.
 - o At Burnaby Youth Hub no evidence was provided. There was no evidence of students receiving Indigenous program services/support throughout the school year.
 - o Take-a-Hike Alternate School had one Indigenous student reported as receiving supplemental supports/service. No service was provided to the student at this facility. There was evidence student attended art class sessions in September 2019 and a January 2020 event. There was no evidence of a continuum of substantive learning experiences throughout the school year, nor that there were services in addition to any other programs and services to which the student was eligible.
 - o At Outlook Secondary Alternate it was verified that there was no evidence students received a continuum of substantive learning throughout the school year, nor were there services in evidence that were in addition to any other programs and services to which the students were eligible. There was also a gap in service availability at this site due to a staffing transition.
 - o At Cariboo Alternate School the supplemental Indigenous services were provided within the secondary school. The services provided at the secondary school were commendable.

During a District-wide review of student exchanges:

- 0.6250 Grade 10 to 12 school age FTEs reported by Alpha Secondary School and 0.1250 FTE by Burnaby Online (DL) were ineligibly claimed for funding. It was verified that the resident student claimed for funding was absent from the District participating in an exchange program, nor were they attending at the September claim date. While the information provided by the District, and as indicated on the student timetable, was that the DL course was to be taken in the second semester, evidence verified there was no February 2020 claim in DL for this student. The partnered reciprocal non-resident student was also reported for funding at the September claim date. As the non-resident student was acting as the placeholder for the absent resident student, this claim was eligible.
- o The purpose of an exchange is to enable a district to recognize funding for the resident student while they are away from the district on exchange. While non-resident students are ineligible for a provincially funded education, for an eligible exchange per the [Eligibility for Students for Operating Grant Funding Policy](#) and the Form 1701 Instructions, boards receive funding only for the ordinarily resident student with the non-resident acting as a placeholder for the resident student during the resident student's absence. The Form 1701 Instructions state that: *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 both the resident and non-resident student does not meet the reporting requirements. It is also noted that as the resident student was reported in Grade 12 the eligibility requirements for Exchange also states: *“Claiming funding for a non-resident student after the resident student has*

graduated does not meet the reporting requirements.” Resident students are to be returning to complete their educational programming in the District’s schools post-exchange, otherwise the intent of the requirement for the non-resident student to act as a placeholder for the resident student is not met.

During a District-wide review of Academies:

- 1.0000 Grade 10 to 12 school age FTE (0.7500 at Cariboo Hill Secondary and 0.2500 at Moscrop Secondary) was claimed for a non-resident, fee paying student participating in the District’s Soccer Academy. It was verified that the parents were not resident in B.C and had paid \$8,000 in school fees. The District understood that this ineligible claim would be adjusted. It was confirmed that all of the other students living with a “custodial parent” or “agency rep” were non-resident fee paying students and were not to be claimed for funding.
- The auditors reviewed the four sports academies offered in the District. Each Academy’s learning objectives, activities, outcomes and assessment processes are to be developed and provided with the administrative procedures supporting the programs in accordance with Section 82.1 of the [School Act](#) and [Specialty Academy Criteria Regulation](#) BC Regulation 219/08, along with the [School Regulation](#) BC Regulation 265/89 specific to Goods and Services. Section 82.1 of the *School Act* says:
 - (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.*
 - Currently the volleyball, lacrosse and soccer academies all collect a non-refundable deposit of \$400 for each academy. During the audit the District staff advised they will remove any non-refundable deposit requirements from its fee structure and application package beginning in the 2020/21 school year.
 - The following were identified as the current fee structures: Burnaby North Hockey Academy \$1,800 a year, Cariboo Hill Volleyball Academy \$2,350 a year, Simon Fraser University (SFU) Lacrosse Academy \$2,350 a year, and the SFU Soccer Academy \$2,300 a year. The District has a partnership with SFU where students work with coaches at SFU and receive credit for Physical Education and sport specific credits through a secondary school.
 - There was no evidence that the Board had consulted with the Parent Advisory Council (PAC) nor evidence of PAC approval for the schedule of fees or non-refundable deposits. There was no evidence of an alliance with any PAC, nor that PACs were part of the fee

process for the academies including the recent decision to increase fees this year. The goods and services rates are to be for the direct costs incurred by the Board in providing these options which are in addition to the costs of providing a standard educational program. These academy options are to be reflective of speciality academies directives as outlined in Section 82.1 of the *School Act* and the related School Regulations.

- While attempting to identify what portion of the fees were specific to direct Board costs and services related to the Academies, it was verified that the Volleyball fees included funds to cover professional development for the coach and funding toward scholarships/bursaries for other students.
- Due to delays during the audit the verification of all eligibility requirements for each academy, in accordance with the *School Act* and related School Regulations, were not completed and require further investigation during a return audit.
- During the audit the District was apprised of the requirements for academies and what amendments are to be made to meet the requirements.
- While there was no evidence of financial assistance through a hardship policy to aid student participation in instances such as academies, the District does retain one.

Recommendations

The auditors recommend that:

- The District 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:
 - The 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 with evidence to verify students receive support services designed to meet their individual educational, social or emotional needs.
 - The 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;
 - The 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 scheduled for the appropriate service provisions specific to an Alternate Education Program are claimed at the Data Collection date.
 - The 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, as well as evidence of when the service supports have/will be provided.
 - The 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.
 - The 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.

- The 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 services, and as verification the student service provision requirement of the Alternate Education Program Policy is met.
- The District staff ensure the process of referral of students to the Alternate Education Programs is consistent with the District screening process and procedures.
- The District staff cease the practice of allocating funds and reporting students as receiving an Alternate Education Program while attending a Continuing Education Program in accordance with the Data Collection and Form 1701 Instructions. Non-graduated school age students enrolled with an Alternate Education Program facility cannot be cross enrolled in a CE school.
- The District staff undertake a review of the operational processes of the Schou Alternate and Cariboo Alternate facilities to determine whether these are programs that meet the requirements of the Alternate Education Program Policy.
- The District consider exploring “alternative” methods of curriculum delivery and support for students who require course completions towards graduation or modified programming for their learning success, but do not meet the requirements for enrolment in an Alternate Education Program.
- The District staff ensure only those students provided with supplemental Indigenous education support programs and/or services in accordance with the [Form 1701 Data Collection Instructions](#) and the [K-12 Funding-Indigenous Education Policy](#) are reported for supplemental funding.
- The District staff ensure consistency in all schools regarding the annual verification of students claimed for Indigenous Education supplemental programs/services including:
 - evidence the student has self-identified;
 - evidence the parent/guardian of the student have been consulted;
 - evidence the Indigenous Education Programs or Services have involved the Indigenous communities in planning and delivery;
 - evidence the Indigenous Education Program and Services are in addition to any other programs and services to which the student is eligible; and,
 - evidence the Indigenous Education Programs or Services provide a continuum of substantive learning experiences and/or support services throughout the school year.
- The District staff ensure that a plan for the delivery of Indigenous education programs/services for all students including those reported in an Alternate Education Program are in evidence at the time of the Data Collection claim date.
- The District staff 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 reporting student exchanges.
 - ensuring 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 funded school year. Reporting both resident and non-resident student during the same funding period; reporting a non-returning graduated resident 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 requirements.

- The District staff verify the eligibility of all students reported for funding, ensuring fee-paying students, not ordinarily resident in B.C., are not claimed for operating grant funding in accordance with the [School Act](#) and the [K-12 Funding-General Policy](#) .
- The District staff ensure all aspects of their academies are aligned with Section 82.1 of the [School Act](#) and [Specialty Academy Criteria Regulation](#) BC Regulation 219/08, along with the [School Regulation](#) BC Regulation 265/89 specific to Goods and Services.
 - ensure there is documented evidence of PAC participation/consultation when establishing the academy and any related fee component.
 - cease charging non-refundable fees when the academies or other educational options are reported for FTE funding. In addition to the academy directives, the [Eligibility of Students for Operating Grant policy](#) says: *Students who are ordinarily resident or deemed resident in British Columbia are entitled to provincial funding under section 82 of the School Act; boards may not charge fees for these students except in accordance with Section 82 of the School Act.*
- All the Alternate Education Program schools be required to undertake a Ministry sanctioned workshop to ensure the audit outcomes and recommendations in accordance with Ministry directives are put into practice, including student service provision specific to the Alternate Education Program policy.
- The District be scheduled for a return audit to ensure practices identified during this audit are brought into alignment with the Ministry directives including academies established by the District, service provision to students reported as receiving an Alternate Education Program, and supplemental services.

Auditors' Comments

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