



**Ministry of Education
Resource Management Division**

2019/20 K-12 Regular Enrolment Audit

**AUDIT REPORT
*REVISED JULY 21, 2020***

SCHOOL DISTRICT No. 78 (Fraser-Cascade)

2019/20 K-12 REGULAR ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 78 (Fraser-Cascade)

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. 78 (Fraser-Cascade) reported a total of 1,678.9375 FTEs or 1,663 students, including 109 students for English Language Learners (ELL) and 627 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. 78 (Fraser-Cascade) during the week of February 2, 2020. The schools audited were:

- Hope Secondary
- Two Rivers Education Center-Alternate (TREC)
- Agassiz Center for Education-Alternate (ACE)

The total enrolment reported by these schools on September 30, 2019 was 208.6875 FTEs, of which 204 student files were reviewed. 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 February 3, 2020 with the Superintendent and each school's Principals as well as the Assistant Superintendent, Secretary-Treasurer, Assistant Secretary - Treasurer, District Coordinator-Student Support Services, District English Language Learning Coordinator, District Indigenous Education Coordinator, and MyEdBC Coordinator 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 schools.

An exit meeting was held on February 7, 2020 with the Superintendent and each school's Principal as well as Assistant Superintendent, Assistant Secretary-Treasurer, District Coordinator-Student Support Services, District English Language Learning Coordinator, District Indigenous Education Coordinator, and the MyEdBC Coordinator. 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
- School-Age Grade 10-12 Course Claims
- Alternate Education Programs
- English Language Learning Supplemental Claims
- Indigenous Education Supplemental Claims
- Post-Secondary Transition Programs with Post Secondary Institutions and Industry Association partners
- Other Career Program Courses

Prior to the audit visit, the auditors undertook a verification of the school-assigned teachers' status with the Teacher Regulation/Certification Branch (TRB). A systemic review was undertaken when one individual was verified as being non-certified prior to and at the time of the audit.

Observations

The auditors found that:

- 1.1250 school-age Grade 10 to 12 FTEs claimed for funding were enrolled in and attending fewer courses than reported at the Data Collection claim date.
- 3.6250 school-aged Grade 10 to 12 FTEs claimed for funding were enrolled and attending classes taught by a non-certified individual. It was verified that the instructor was without certification by the TRB which led to a systemic review of all FTE claims. It was confirmed that the individual had not received their certification at the time of the September 2019 claims nor at the time of the audit. In accordance with the [School Act](#) Sec19: "*a board must not employ a person as a teacher, principal, vice principal, director of instruction, superintendent of schools or assistant superintendent of schools unless that person (a) holds a certificate of qualification as a teacher, or (b) holds a letter of permission to teach issued*

under the Teachers Act” and the [K-12 Funding-General Policy](#): *To be eligible for provincial funding, Boards of Education must ensure that students are under the supervision of, assessed and evaluated by an employee of the Board of Education who is certified by the Teacher Regulation Branch*”. At the time of the audit the TRB were contacted and confirmed that the individual was deemed ineligible for certification.

- 2.0000 school-age Grade 10-12 FTEs reported for funding were not ordinarily resident in British Columbia. 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”*. A systemic review confirmed these international students were fee payers, were not ordinarily resident, nor eligible for provincial funding.
- 3.0000 school-age non-graduated FTEs were verified as not attending and were without evidence aligned with the [Alternate Education Program policy](#).
- 4.0000 school-age non-graduated FTEs reported as receiving an Alternate Education program 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.*
 - In many instances, there was difficulty obtaining the necessary evidence to verify students were receiving support services in addition to those provided in a traditional school. There must be evidence each student receives differentiated instruction, specialized program delivery and enhanced counselling services specific to the students’ needs not available in a traditional school environment, including individualized clearly defined objectives, recognition of additional services required, what progress is/was made, and transition plans/exit strategies.
 - Many of the non-special needs students reported as receiving an Alternate Education Program at TREC had student learning plans (SLPs) identifying only the graduation courses required, not unlike that of a traditional secondary school. These SLPs did not contain objectives, additional services, progress made and/or specific transition plans contrary to the [Alternate Education Program policy](#) requirements. The policy requires Alternate Education Programs to provide support through differentiated instruction, specialized program delivery and enhanced counselling services based on the individual student’s needs. While the majority of these students’ education delivery was through a self-paced delivery mode, there was evidence generated at the time of the audit that additional support services were in place.
 - The non-special needs students reported as receiving an Alternate Education Program at ACE had SLPs reflecting the Alternate Education Program Policy requirements.

- 0.5000 school aged Grade 10-12 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 guidelines 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.

- 1.0000 school-aged Grade 10-12 FTEs were reported for the funding of Youth Work-In-Trades Courses (WRK). There was no evidence aligned with the [Youth Work in Trades Program Guide](#) criteria.
- Six school age students were reported as receiving an Indigenous Education Program and/or Service. There was no evidence students had been provided with any supplemental services in accordance with the [Form 1701 Data Collection Instructions](#) and the [K-12 Funding-Indigenous Education policy](#).
 - Three of these students were also verified as not enrolled and attending at the September claim date.
- Evidence for supplemental Indigenous Education services to eligible students contained an annual record that the parent of the student had been consulted.
- Two student claims for English Language Learning (ELL) supplemental funding were verified as international fee paying students ineligible for the supplemental funding.
- The staff at Hope Secondary had the required evidence prepared and organized to assist with verifying the eligibility criteria. While the timetables had not been archived at the September claim date, the student data at September 16th, 2019 had been retained. This data along with the add/drop course forms provided the information required to aid with verification of the claims.

Recommendations

The auditors recommend that:

- District staff are to ensure that all reported FTEs are eligible for funding, reflect the *School Act*, and related policy directives including certification or maintaining the appropriate educator authorization from the TRB for their teachers.
- District staff ensure all schools claim only those students who are enrolled and attending as at the Data Collection claim date.
- District staff ensure all schools report only eligible courses, including evidence to verify the funded claims.
- All schools refrain from loading timetables with career options as placeholders at the Form 1701 claim dates. Career options are reported only when these are actually part of the student's annual planned program towards graduation, the related directives are in place, and there is evidence to verify the requirements.
- 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:

- All students have had an in-school orientation specific to the performance of tasks and responsibilities related to work placements and in addition to any Career Life orientation.
- All students claimed for WEX12 courses have a duly signed WEX12 Agreement before students begin their work study program and there is evidence the students are covered by WorkSafeBC.
- All students on work placements are monitored and that the monitoring activities are documented as verification that this supervision occurred.
- District staff ensure only eligible student FTEs are claimed for WRK options and those claims are aligned with the Youth Work-In-Trades Guidelines.
- District staff ensure 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;
 - students are 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.
- District staff review the criteria for the SLPs of non-special needs students reported as receiving an Alternate Education Program to ensure the Alternate Education Program Policy directives are met.
- On an annual basis, to align with the annual school year funding claim, SLPs must contain objectives for the student, additional services to be provided to the student, progress made towards the student's goals and specific transition plans. The policy also requires Alternate Education Programs to provide support through differentiated instruction, specialized program delivery, additional services and enhanced counselling services based on students' needs.

- In addition to identifying only those courses the student requires to graduate, the TREC Alternate School be required to develop SLPs aligned with the Alternate Education Program Policy requirements. It is further recommended that TREC implement a more reliable attendance tracking system and retain evidence of required service and supports for each of the non-graduated school age students reported as receiving an Alternate Education Program.
- District staff ensure that only those students receiving Indigenous Education support programs and/or services in accordance with Ministry directives are reported for supplemental funding.
- District staff ensure the requirements for supplementary ELL funding as set out in the Form 1701 Instructions and the [ELL Policy and Guidelines](#) are met for each student reported for this supplemental funding.
- District staff ensure the accuracy of all reported claims before remitting for funding, including student timetables, student attendance and verification of residency in B.C. by their schools.

Auditors' Comments

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