



**Ministry of Education
Resource Management Division**

2019/20 K-12 Regular Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 81 (Fort Nelson)

2019/20 K-12 REGULAR ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 81 (Fort Nelson)

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. 81 (Fort Nelson) reported a total of 670.5000 FTEs or 681 students, including 12 students for English Language Learners (ELL) and 219 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. 81 (Fort Nelson) during the week of February 18, 2020. The schools audited were:

- Fort Nelson Secondary School
- Toad River Elementary/Secondary

The total enrolment reported by these schools on September 30, 2019 was 252.5000 FTEs, of which 145 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 18, 2020 with the Superintendent and each school's Principal, two trustees, District Aboriginal Support worker and the Career 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 school.

An exit meeting was held on February 21, 2020 with the Superintendent and each school's Principal and two trustees including the Board Chair. 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
- English Language Learning Supplemental Claims
- Indigenous Education Supplemental Claims
- 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). Two teachers were verified by the TRB on February 20, 2020 that the individuals were not certified/without a Letter of Permission at the September claim date or at the time of the audit.

Observations

The auditors found that:

- There was evidence of a vibrant Indigenous Program that offered a variety of services to the students. The program's District Aboriginal Support Worker and school administrators knew the students well and were able to provide information about the students and what services were needed and/or accessed. Staff worked with students to achieve their academic, social and emotional goals which are the pillars of the District's Enhancement Agreement.
- While the timetables had not been archived at the September 30th claim date, the student data at October 9, 2019 had been retained. This data along with the add/drop course forms and the November 2019 report cards provided the information required to aid with verification of the claims. In some instances, the team also reviewed the February 2020 timetables for career related claims.
- The District does not currently have a student withdrawal policy Per the [Provincial Letter Grades Order](#) assigning a 'W' (withdrawal). Withdrawals must be according to the policy of the board as well as upon request of the parent of the student or student when appropriate. There is a checklist/form the secondary school uses to ensure books are returned, possible invoices, the reason for leaving and a forwarding address.
- 1.1250 school-age grade 10-12 FTEs claimed for funding were enrolled in and attending fewer courses than reported at the Data Collection claim date.
- 5.0000 Kindergarten to Grade 7 student FTEs, 2.0000 Grade 8 and 9 student FTEs and 10.2500 school aged Grade 10-12 FTEs claimed for funding were enrolled and attending

classes taught by non-certified individuals. It was verified that two instructors were without certification by the TRB which led to a systemic review of all FTE claims. It was confirmed that neither of the individuals had received their certification/letter of permission at the September 2019 claim date 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*”. The District became aware of this through the audit process. At the time of the audit, both individuals were employed in the District without the appropriate certification.

- Non-certified teachers were also identified during the District’s 2015/16 K-12 Regular Enrolment Audit.
- At the time of the audit it was verified that the District did not ensure there was a completed criminal record check for the non-certified instructors before they began their assignments, as it was incorrectly determined by the District staff that this would be undertaken as part of the certification process.
- 0.6250 school aged Grade 10 to 12 FTEs were claimed for an English course at Northern Lights College. Contrary to the [Recognition of Post-Secondary Transition Programs for Funding Purposes Policy’s](#) rationale “*Secondary schools are not always able to offer the full range of courses or programs that help prepare students for specific occupations.*” The Post-Secondary Transition Funding Policy 's rationale is to encourage school districts to improve transition success for students through partnerships with Post-Secondary Institutions (PSI) when secondary schools are unable to offer the full range of courses or programs that help prepare students for specific occupations. It was verified that the school enrolled the student in an English course which is an educational option available at the District’s schools. Post-Secondary transition program courses are only funding eligible if they are part of the school-age student’s planned program of study leading to graduation and bridging options to aid students in improving success towards their goal once they have left the K-12 school system. Post-Secondary transition options provided by third parties where the outcome is dual credit for the school-age students are only those educational options the District schools are unable to provide and these options are part of the student’s planned program of courses which lists their post-secondary transition program taken during their Grade 11 or Grade 12 year. Reporting students in a course at a PSI that is available in their high school does not meet the policy directives.
 - There was no evidence to indicate the non-graduated school age students’ specific occupation aligned with the funded PSI option.
 - One graduated student was claimed for English 100 provided at the college. Per the [Recognition of Post-Secondary Transition Programs for Funding Purposes Policy](#): “*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.*” The [K-12 Funding General policy](#) states that: “*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.”

- 3.2500 school-aged Grade 10 to 12 FTEs were claimed for BAA courses that were not approved nor eligible for credit in the current Graduation Program.
 - two options reported as BAA courses (Teacher Assistant 11 and Teacher Assistant 12) were originally approved April 12, 2005 yet were being offered at Fort Nelson Secondary and Toad River Elementary/Secondary schools for the 2019/20 school year. There was no evidence the current BAA directives were followed nor in accordance with [BAA Guidelines](#) to align with the “Know-Do-Understand” curriculum design.
- Ineligible BAA courses were also identified during the District’s 2015/16 K-12 Regular Enrolment Audit. In the 2015/16 school year, these same BAA courses Teaching Assistants 11 and/or Teaching Assistants 12 were used as timetable placeholder courses.
- 0.5000 school-age Grade 10 to 12 FTEs were reported as a support block which did not meet the requirements of a support block or any full credit course claim. The eligibility of a support block claim must align with the Form 1701 Instructions wherein *“Each support block is to be considered equivalent to the 120 hours of instruction of a regular 4-credit course, instructional service is provided and documented by a teacher, regular attendance is expected, and does not include independent study time, drop-in sessions, voluntary study halls, tutorial sessions or time spent on courses at another school”*. There was no evidence these FTE met the support block requirements.
 - A block identified as an English Language Learning (ELL) support session had no evidence aligned with the support requirements.
 - During the audit it was identified that the school was attempting to create a timetable to provide blocks of time when the ELL teacher could work with students. The ELL teacher was not aware of this course claim.
- A number of students were cross enrolled with DL schools. In one instance, the student was enrolled for the same course at both the DL facility and Fort Nelson Secondary. There was no process for ensuring course claims were not duplicated. The Form 1701 Instructions state that: *“Students are not allowed to take the same course at the same time during the funded school year whether in different schools or the same school.”*
- At Toad River Elementary/Secondary funded support blocks were timetabled into the secondary student schedules as 30 minute blocks. While there was no evidence at the time of the audit, the description provided verbally by the administrator was that students were to work on learning strategies and time management skills. There was no evidence of the instructional service provided, no evidence of any curriculum provided, nor any documentation by a teacher of the learning undertaken and without reference on the report cards.
- Ineligible support blocks were also identified during the District’s 2015/16 K-12 Regular Enrolment Audit.
- At Toad River Elementary/Secondary the students were assigned class time from 8:30 a.m. to noon each day to work on core curriculum through DL. The students’ secondary elective courses, claimed through the secondary school, were scheduled in the afternoon. The Distributed Learning (DL) courses during this timeline were without evidence of support and reflective of time spent on a course at another school.

- At Fort Nelson Secondary the Career Education Teacher runs a diverse career education program. Evidence indicated the sites are routinely visited and students on placements are frequently monitored.
 - While the career program information was available, not all forms used for careers programs were current. Many of the District/Industry Training Authority (ITA) forms were outdated.
 - The application and registration forms in student files were not always signed and/or dated.
 - The documentation used for the evaluation of WEX12, Work-In-Trades and Train-In-Trades claims utilized the same employer's document. This form did not completely capture the student's learning goals for skill development and knowledge to be developed.
 - Transition plans lacked detail regarding student's specific career goals and the focus area the student is choosing.
 - While the Fort Nelson Secondary's Student Apprenticeship Workbook identified content for all trades-bound students, this document also required updating to reflect the current terminology for each of the career areas.
- There was limited 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.

- The WEX application form did not identify if the student was enrolled in WEX 12A or 12B (or both) and in instances where the student was continuing with the same employer for WEX12B there was no evidence of the separate and distinct training plan in accordance with the current WEX12 directives.
- It was verified that many students continued with the same employer for both WEX12A and WEX12B funded options. The Form 1701 Instructions states that *“Schools must ensure when tracking hours related to the work study program segment of WEX12A/B, WRK11A/B and WRK12A/B that each of these four credit courses are only claimed once regardless of the number of reporting periods the student requires to complete the work placement component.”* There was no evidence that the WEX12B course had delineated job expectations/functions to those that were undertaken in WEX12A but only a continuation of the WEX12 duties contrary to the Form 1701 reporting instructions and without a training plan for each of the WEX12 courses the student undertakes.
- WEX12 claims at Toad River Elementary/Secondary did not meet any of the guidelines/policies. There was no evidence of an in-school orientation or a duly signed WEX12 agreement form, no training plans, no evidence of WorkSafeBC coverage, no student monitoring by school district personnel, and no evidence of evaluation of the students’ performance by the teacher.
- A number of the ineligible claims identified at Toad River Elementary/Secondary as educational programming provided by non-certified individuals also represented ineligible BAA options, WEX12 without evidence aligned with Ministry directives and ineligible support blocks.

Recommendations

The auditors recommend that:

- District staff ensure 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 schools are to ensure there is evidence of all student FTEs reported to verify the Data Collection claims for the funded school year, and that the funding data is retained at each claim period deadline, in accordance with the annual MyEdBC directives to all Level 1 district staff members and per Form 1701 Instructions which recommends retaining student attendance and participation documents for each reporting claim to facilitate in the resolution of duplicate enrolment issues and to assist in the enrolment audit process.
- District staff ensure all schools report only eligible courses, including evidence to verify the funded claims.
- District staff ensure that no Board Authorized (BAA) courses are offered and claimed for funding until processes in accordance with the related Ministry's directives and guidelines are met.
- District staff ensure all schools reporting support blocks verify that only eligible support blocks are claimed. In accordance with the Form 1701 Instructions, *“Each support block is to be considered equivalent to the 120 hours of instruction of a regular 4-credit course, instructional service is provided and documented by a teacher, regular attendance is expected, and does not include independent study time, drop-in sessions, voluntary study halls, tutorial sessions or time spent on courses at another school.”*
- District staff ensure student claims do not reflect duplicated courses and adhere to the Form 1701 Instruction requirements that students are not taking the same course at the same time whether in different schools or the same school during the funded school year.
- The Board be required to create a student withdrawal policy in accordance with the [Provincial Letter Grades Order](#).
- District staff refrain from reporting PSI funding for options not aligned with the [K-12 Funding Policy](#) and ensure all PSI transition claims for school-age students align with the rationale and directives of the [Recognition of Post-Secondary Transition Programs for Funding Purposes Policy](#). The students begin taking the post-secondary courses that are part of their transition program during their Grade 11 or Grade 12 year. The student's post-secondary transition plan indicates why various post-secondary options are being taken (and funding eligible) and aligned to the student's future post-secondary or trade objectives once the student has left the secondary school system.
 - Offering to provide a student with PSI course options after meeting graduation requirements does not meet the two policy directives;
 - Reporting funded options not required for the specified post-secondary credential outlined in the transition plan falls outside the purpose of qualifying dual credit to support the student's transition to a specific occupation.
 - Post-Secondary Transition Program documentation is to identify a student's specific occupation and stipulates how the funded claims are aligned with the student's program options towards graduation.

- District staff ensure all forms used for their various Careers Program options (including Youth Work In Trades and Youth Train in Trades) are up-to-date, contain current terminology, and are duly signed and fully dated by all related parties where applicable.
- 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 have individualized training plans for each WEX12 claim.
 - 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.
- A return audit be scheduled 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.