



**Ministry of Education  
Resource Management Division**

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

**AUDIT REPORT**

**SCHOOL DISTRICT No. 84 (Vancouver Island West)**

## **2019/20 K-12 REGULAR ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 84 (Gold River)**

### **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. 84 (Vancouver Island West) reported a total of 474.3750 FTEs or 538 students, including 72 students for English Language Learners (ELL) and 280 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. 84 (Vancouver Island West) during the week of February 10, 2020. The school audited was:

- Tsawalk Learning Centre

The total enrolment reported by the school on September 30, 2019 was 90.0000 FTEs. All student files were reviewed.

An entry meeting was held on February 10, 2020 with the Superintendent and the Tsawalk Learning Centre's Principal to review the purpose of the audit and the criteria for funding as outlined in the Form 1701 Instructions.

The audit team visited the two Tsawalk Learning Centre sites in Nanaimo and worked out of the Nanaimo Aboriginal Centre to review student files, interview staff, and conclude on their observations. The audit team followed a process which gave the 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 14, 2020 with the Superintendent and the Tsawalk Learning Centre's 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
- Indigenous Education Supplemental Claims
- 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).

## **Observations**

This Alternate Education Program is for Grade 8 to 12 students and was established in 2015 in partnership with the Nanaimo Aboriginal Centre (NAC), the Mid-Island Metis Nation and Boys & Girls Clubs of Central Vancouver Island. It is a 12-month program operating in two storefront locations in Nanaimo. Students attending the program are often those who have been out of school for an extended period of time, exhibit social/emotional issues, learning deficits, and are far behind in obtaining credits toward graduation. This Alternate Education Program is staffed by seven certified teachers and a Principal. The community partners provide support workers, youth counsellors and elders in residence.

The Alternate Education Program's Growth Plan is focused on student well-being, core competencies, and Indigenous ways of learning and knowing. Key indicators of progress toward achieving its goals include qualitative assessment of the core competencies and personal well-being, attendance, course completions and transitions.

The partnership arrangement with Tsawalk's community service providers has resulted in the creation of a safe learning space for youth. While the Alternate Education Program's focus is on attending to the social/emotional and cultural needs of students with a view to helping them re-engage with learning, the necessary academic focus did not meet the requirements aligned with the [Alternate Education Program Policy](#). This includes balancing the focus on social/emotional/cultural priorities as well as additional progress to help students achieve curricular competencies and attaining a graduation or adult graduation diploma as a goal for the students.

The auditors found that:

- The Alternate Education Program at the Tsawalk Learning Centre operates on a continuous entry, self-paced learning model. Course offerings provide a variety of core and elective courses leading toward graduation. Opportunities for collaboration and project-based learning have been incorporated into some academic learning activities and many Indigenous cultural activities. There are many examples where curriculum standards in English, Mathematics and Social Studies are addressed through the many cultural activities open to students. There are also scheduled structured lessons that address student literacy and numeracy skills.
- The primary means of engaging students with curriculum is through hard copy resources. Some courses are provided using a Moodle-based curriculum offered through Western Canada Learning Network. The Alternate Education Program is working toward broadly incorporating the current curriculum. A sampling of curriculum planning documents provided evidence that core competencies, First Peoples Principles of learning, big ideas and curricular competencies are incorporated into the learning experiences for students.
- 15.0000 school-age non-graduated FTEs claimed were verified as not attending and were without evidence aligned with the [Alternate Education Program policy](#).
- 2.0000 school-age non-graduated 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.*
  - The SLPs were completed by the Principal as part of the intake process. Objectives for the student and indicators of how student progress would be measured were not readily apparent. Additional services provided were not in evidence and did not include names of service providers or dates on which the student received the service(s). While some of the SLPs had review dates for the current year, this was not a consistent practice.
  - The IEPs reviewed were comprehensive and included measurable goals and objectives, measurement of student progress and a list of additional services. There was no evidence of transition planning.
- Six of the school-aged Grade 10-12 FTEs were reported as taking Work Experience 12 (WEX12). While the District had established guidelines for conduct, supervision, evaluation and participation with a certified teacher, 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:

- 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.

- It was verified that none of the WEX12 claims meet the requirements. There was no evidence of approved training plans signed off by the educator, student, and employer nor of a required in-school school orientation or a duly signed WEX agreement. There was limited evidence of WorkSafeBC coverage and while there was an assigned teacher who evaluated the course and assigned a percentage, the employer monitored the students.
- The primary service provider of supplemental Indigenous Education programs and/or services for this Alternate Education Program was the Nanaimo Aboriginal Centre. The Centre provided a variety of indigenous cultural experiences based on Indigenous ways of learning and knowing. Indigenous elders in residence were actively involved with students on a regular basis.
  - 11 students reported as receiving an Indigenous Education Program and/or Service were verified not to have received substantive, ongoing services and/or support in accordance with the [Form 1701 Data Collection Instructions](#) and the [K-12 Funding-Indigenous Education policy](#).
  - Six student claims verified as not enrolled and attending as at September 30, 2019 were also reported as receiving an Indigenous Education Program and/or Service.
- There was a District standard practice to verify students were ordinarily resident in B.C. with evidence the Alternate Education Program followed this practice.

## **Recommendations**

The auditors recommend that:

- If the District is to retain the Alternate Education Program classification, the District staff are to ensure additional indicators are in evidence providing frequent feedback on the efforts to engage learners and add value in informing educational supports and servicing practices. In addition to courses attempted/completed and monthly attendance targets, it is recommended that the Alternate Education Program establish mechanisms to quantify the degree to which students achieve their learning goals. Periodic literacy and numeracy assessments would also serve the program well tracking student progress in attaining fundamental skills and informing instructional practices.
- 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 facility 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 student population in traditional schools. 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 are 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, 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 facility ensuring these plans align with the special education guidelines.
- The District staff review the systems used by the Alternate Education Program facility 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 undertake a review of the operational processes of the Tsawalk Alternate facility to determine whether this is a program 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.
- District staff report only those students who are enrolled and attending as at the Form 1701 claim date.
- The District staff ensure that only eligible student FTEs are claimed for WEX12 and that these students are receiving an educational program and instructional component in accordance with all Ministry directives related to WEX12 including evidence to verify those claims.
  - The District ensure that, in accordance with the WEX Program Guide and the WEX Policy, 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.

- The District ensure that all students claimed for WEX12 courses have a work 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, a dually signed WEX12 Agreement, and there is evidence the students are covered by WorkSafeBC before all students reported for WEX12 begin their work study program.
- All schools ensure that students on work placements are monitored and that the monitoring activities be documented as verification that this surveillance occurs.
- Should the District continue to retain the Alternate Education Program category for the Tsawalk facility, the staff be required to undertake a Ministry of Education sanctioned workshop specific to the Alternate Education Program policy directives.
- 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.