



**Ministry of Education  
Resource Management Division**

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

**AUDIT REPORT**

**SCHOOL DISTRICT No. 8 (Kootenay Lake)**

## **2019/20 K-12 REGULAR ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 8 (Kootenay Lake)**

### **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. 08 (Kootenay Lake) reported a total of 4,540.7500 FTEs or 4,534 students, including 64 students for English Language Learners (ELL) and 876 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. 8 (Kootenay Lake) during the week of March 24, 2020. The schools audited were:

- Prince Charles Secondary (PCS)
- LV Rogers Secondary (LVR)
- Sequoia Centre Alternate (SCA)
- REACH Alternate (REACH)

The total enrolment reported by these schools on September 30, 2019 was 1,194.3125 FTEs, of which 309 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.

For each of the schools audited, a segment of the students reported in the 2019/20 school year were selected for review.

An entry meeting was held on March 24, 2020 with the Superintendent and each school's Principal, District Principal-International Education, District Principal-Indigenous Education, Secretary-Treasurer, Director of Inclusive Education, District Principal-Innovative Learning, three Vice-Principals, Director of Instruction, Director of Human Resources, District Principal, District Teacher/Trades Coordinator and the Director of Technology 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 March 27, 2020 with the Superintendent and each school's Principal, District Principal-International Education, District Principal-Indigenous Education, Secretary-Treasurer, Director of Inclusive Education, District Principal-Innovative Learning, three Vice-Principals, Director of Instruction, Director of Human Resources, District Principal, District Teacher/Trades Coordinator, Director of Technology, Indigenous Support Worker, Coordinator-Inclusive Education, six Teachers and five Board Office/School Clerical and Student Support staff. 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
- Adult Student 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).

### **Observations**

The auditors found that:

- The District and school staff were very helpful throughout the audit process providing detailed records. Documents were easy to find and grouped in sections (report cards, student schedules and registrations). The staff were readily available to answer questions and to provide additional information regarding students, programs, or other queries.

- The Indigenous Education program, as presented at the time of the audit, was an exemplar for other districts.
  - The Indigenous service evidence was comprehensive and included all supporting documentation required for the program. Detailed notes/data were kept on additional services to students including the service provided and the date of the service.
  - All staff demonstrated a clear understanding of how their programs linked to the District's Enhancement Agreement.
  - Of note was the District's improved graduation rates for indigenous students.
- While the student data had not been archived at the September 30<sup>th</sup> claim date, the student data retained at Prince Charles Secondary was the September 25, 2019 timetables and at LV Rogers Secondary it was the June 21, 2019 timetables. 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 February 2020 timetables when required.
- 4.6250 school-age Grade 10-12 FTEs claimed for funding were enrolled in and attending fewer courses than reported at the Data Collection claim date.
- 4.5000 school-age Grade 10-12 FTEs were verified as not enrolled and/or attending at the claim date.
- 2.3750 school-age Grade 10-12 FTEs were reported for a WEX12B course that was verified as a continuation of WEX12A. 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 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.
- Overall the Elective Work Experience Courses and Workplace Safety Policy specific to WEX12 eligibility says:
 

*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.

- 0.1875 school-age Grade 10-12 FTEs reflect adjustments to two credit options reported for funding as four credit options. Students were offered an option for either a two-credit Peer Tutoring course or a four-credit Peer Tutoring course. Both options were labelled with the same course code and were reported as a four-credit course.
- Two school-age Grade 10-12 students reported as receiving English Language Learning (ELL) supplemental services were without evidence aligned with the [English Language Learning Policy and Guidelines](#), the [K-12 Funding-English Language Learning Policy](#) and the [Form 1701 Instructions](#). One student claim was without evidence of ELL service per the ELL directives and one student was not attending. All directives identify that in order for a Board of Education to qualify for supplemental funding for ELL support services, there must be, for each student reported:
  - ✓ Documentation of a current annual English Language proficiency assessment dated after the previous school year's claim date;
  - ✓ Evidence that a current annual instruction plan is in place dated after the previous school year's claim date;

- ✓ Evidence that an ELL specialist teacher is involved in the development of the instructional plan and participates in a regular review of that plan during the school year (at a minimum, at each student reporting period);
- ✓ Evidence that additional ELL services are being provided;
- ✓ A schedule or list documenting the ELL services are provided by an ELL specialist teacher, teacher or teacher's assistant; and
- ✓ Documentation of the student's progress in the acquisition of English proficiency in all Student Progress Reports
  - At one school site it was difficult to find the evidence required for the ELL service as the District has a large International Program. It was challenging for the school staff to disaggregate the information for the services provided to the international students and those that were intended for the funded ELL supplemental services/supports. While each student had evidence of a current assessment and an annual instructional plan, there was no evidence to capture the specificity of the service delivery. It was only through dialogue with the teachers that it was possible to ascertain what adaptations were being provided to support each funded student's English Language proficiency.
  - While there was evidence the teachers working with the students were experienced in ELL, there was no evidence that a specialist teacher was involved in the development of the instructional plan or participated in a regular review of the plan during the school year.
  - Evidence of progress in the acquisition of English reported to parents in regular reporting periods was inconsistent between the sites. The current efforts to report to parents employs the use of a Matrix, which had sections in bold print that represented where the student was represented on the matrix. The language was complex, and the document was difficult to read.
  - One student verified as not attending was also reported as receiving Indigenous Education programs and/or services.
  - 0.5000 school-age Grade 10-12 FTEs reported for funding was not ordinarily resident in British Columbia with their parent/guardian as required by the *School Act* and in accordance with the [K-12 Funding General Policy](#) and the [Eligibility of Students for Operating Grant Funding Policy](#). It was verified that the student had moved from Ontario to live with relatives with the student's parents providing a letter permitting the relatives to be the student's official contact. There was no evidence student was ordinarily resident with their parent/guardian. In accordance with the [K-12 Funding General Policy](#) "*To be eligible for provincial funding, Boards of Education must ensure that students are: ordinarily resident in BC (and where applicable for school-age students) with their parent/legal guardian*". From the Eligibility policy is the following information about guardianship:
    - *A person cannot become a child's guardian by agreement except if the person is the child's parent, or if guardianship is transferred by agreement under the Adoption Act, or the Child, Family and Community Service Act [Section 50 of the Family Law Act]*
    - *A person may be appointed as a child's guardian:*
      - *by court order,*

- *in a will made in accordance with the Wills Act (alternatively, a guardian may be appointed by prescribed form – see section 27 of the [Family Law Act Regulation](#)),*
- *by a guardian who is facing terminal illness or permanent mental incapacity, provided the appointment is made in the prescribed form (see section 27 of the [Family Law Act Regulation](#)).[Sections 51, 52, 53 and 55 of the Family Law Act]*
- At each Alternate Education facility site, the staff were able to articulate their knowledge of the student and what program requirements were available. There was a strong level of commitment and dedication from the alternate teachers, administrators and support staff. It was evident that the staff provided a safe school experience as well as support for the students outside of their school experience.
- 2,000 school-age Grade 10-12 FTEs reported as receiving an Alternate Education Program were without evidence to meet the requirements of the Alternate Education School Program Policy.
  - Of the five student adjustments in the alternate programs: three student claims were without evidence of attending and two student claims were without evidence of additional supports and service beyond that of a traditional school.
  - The policy states...*“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”.*
  - Even though it was evident that the Alternate Education Program facilities provided services to the students, 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.
- In advance of the audit it was confirmed by the TRB that one individual hired by the District was not certified. 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”*. In this instance the individual began their assignment in the second semester and was teaching for less than 20 days when the eligibility was resolved.

- During the audit it was verified that the District is forging pathways and relationships with local businesses to provide a wide range of career education opportunities to its students.
  - While the career program information was available, not all forms used for careers programs were current.
  - The forms were not always signed and/or dated.
  - The documentation used 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.
- Students were incorrectly reported for XSIEP block claims. The students did not have an IEP, nor a special needs designation. The Form 1701 Instructions identifies that these generic non-credit codes are only for Grade 8-12 and SU students who have a reported designated special needs category; have an IEP; are receiving an educational program and/or support to meet the goals of the student’s IEP; and, are assigned this activity because it is being used to assist the student in meeting one or more of the IEP goals. No adjustments were recommended in this instance only as there was evidence students were receiving service in accordance with support block requirements.
- For several courses, the course code and course name were changed yet the revision was not entered into the student’s records nor in MyEdBC.
  - A Board/Authority Approved (BAA) course for Rugby was changed to “Fitness and Conditioning 12”, a District’s BAA course for Photography was changed to the Ministry Authorized version code of MVAPH 11 and 12, and Advanced Placement English was repeatedly coded as Literary Studies.

## **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 (XSPBK) in accordance with the Form 1701 Instructions are claimed. XSIEP blocks are only to be reported for eligible students with a special needs designation and are assigned the activities to assist in meeting their IEP goals.



- Only students who are ordinarily resident in B.C. in accordance with Ministry directives are to be reported for funding.
- 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:
  - For all WEX 12A and WEX 12B options with the same employer each course has a separate and distinct training plan signed off by the educator, student, parent (if applicable) and employer that articulates the skills and areas of knowledge to be developed during the placement. Training plans are to outline learning goals for skill development and refinement for the WEX placement and demonstrates a student's progress through the learning standards **for each of the WEX courses the student undertakes.**
  - 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.
- Schools must report course credit in accordance with the Form 1701 directives. Two credit course claims are to be reported as a half course (0.5) generating 0.0625 FTE while each four credit course is reported as one course (1.0) generating 0.1250 FTE.
- District staff ensure that each course is coded correctly reflecting either a Ministry course or a Board approved BAA option.
- District staff ensure only those students provided with supplemental ELL support programs and/or services in accordance with the [ELL Guidelines](#), [Form 1701 Data Collection Instructions](#) and the [K-12 Funding-English Language Learning Policy](#) are reported for supplemental funding including evidence that an ELL specialist teacher is involved in the development of the instructional plan and participates in a regular review of the plan during the school year.
- District staff ensure that a plan for the delivery of ELL 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 ensure only those students provided with supplemental Indigenous Education support programs and/or services are reported for funding.
- 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:
  - there is 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.

- 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.
- District staff consider undertaking a Ministry sanctioned workshop to ensure career options are current and in accordance with Ministry directives.

### **Auditors' Comments**

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