



**Ministry of Education
Resource Management Division**

2020/21 Summer Learning Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 42 (Maple Ridge-Pitt Meadows)

2020/21 SUMMER LEARNING ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 42 (Maple Ridge-Pitt Meadows)

Background

The Ministry committed to provide funding for school age non-graduate students for any course that led to graduation based upon a set funding schedule. The current funded amounts are dependent upon the three categories of summer course claimed. Boards of Education reported the number of course enrolments for those courses offered, attended and completed by eligible students between July 1, 2020 and August 31, 2020.

The audits are based on [Form 1701: Student Data Collection Completion Instructions for Summer Learning](#) and related [Ministry policies](#). The outcome of these audits provides assurance to the Ministry of Education and boards of education that policies, legislation and related directives are being followed.

Funding recoveries are expanded to include FTEs outside of the sample when the auditors make a clear link between the audit findings in the sample and those FTEs outside the sample.

In the summer of 2020 for the 2020/21 school year, boards of education reported a total of 96,329.50 summer learning enrolments for Grade 1 to 12 students. School District No.42 (Maple Ridge-Pitt Meadows) reported 869 students taking 945 summer learning options for the reporting period of July 1, 2020 to August 31, 2020.

Workplace and travel restrictions resulting from the Covid-19 pandemic provided an opportunity for the Ministry of Education and school boards/independent school authorities to transition to digital remote evidence verification during the 2020/21 school year. Due to the remote procedures undertaken, much of the evidence was based on anecdotal explanations when evidence submitted by the District required further clarification.

Purpose

The purpose of the summer learning audit is to determine for the Ministry of Education and boards of education the accuracy and appropriateness of the student and school data reported to the Ministry by school districts through the verification of course enrolment reported on Form 1701; confirmation all students claimed for funding are eligible students including ordinarily resident in British Columbia; and, assurance that students claimed for supplemental funding are receiving those additional services.

Description of the Audit Process

A remote Summer Learning audit was conducted in School District No. 42 (Maple Ridge-Pitt Meadows) during the week of March 1, 2021. The sample consisted of 175 students, reported with 94 courses in Grade 1 to Grade 12, 50 supplemental claims for indigenous supports and 50 supplemental claims for special needs.

An entry meeting was held on March 1, 2021 with the Superintendent, Assistant Superintendent, Summer Learning Principal, District Vice Principal-Learning Services, and the Secretary Treasurer to review the purpose of the audit and the criteria for funding as outlined in the Form 1701 Instructions.

The audit team reviewed the summer learning student data, interviewed staff, and concluded on their observations. The audit team followed a process which gave staff the opportunity to locate and present additional evidence when evidence was not available in the data provided.

An exit meeting was held on March 5, 2021 with the Superintendent, Assistant Superintendent, Summer Learning Principal, Secretary Treasurer, Coordinator-Indigenous program, and the Director of Learning Services. At the exit meeting the auditors presented their preliminary results and clarified any outstanding issues.

Prior to the audit visit, the auditors undertook a verification of the summer learning-assigned teachers' status with the Teacher Certification/Regulation Branch (TRB).

Observations

The summer learning courses offered were:

Grades 1 to 6, July 6 to July 22 from 9:00a.m. to noon on-site

- offered two days a week (Monday/Tuesday Group -or- a Wednesday/Thursday Group)
- No sessions held on Friday

Grade 7 Transition Option, July 6 to July 17 from 9:00a.m. to noon totalling 15 hours

- Students assigned to work on site two days per week (Monday/Tuesday Group -or- a Wednesday/Thursday Group)
- No sessions held on Friday

Grades 8 to 9, July 6 to July 27 (varied times)

- Numeracy and Literacy Skill Building courses
- Offered as a blended model (face-to-face and remote learning)

Grades 10 to 12, July 6 to 27 (varied times)

- Academic courses (majority as full credit options)
- Offered as a blended model (face-to-face and remote learning)

Due to the evolving nature of the Covid-19 pandemic, the K-12 sector under the guidance of public health officials created operational guidelines to support school districts in developing plans to deliver educational opportunities and supports during a gradual return to full-time in-class instruction. The Plan included a five-stage return to full in-class instruction in K-12 schools, guided by strict health and safety standards. All school districts and independent school authorities were expected to be in Stage 3 on June 1, 2020.

The operational guidelines for Stage 3, included the following: ***“For Stage 3, schools and school districts will be expected to track student attendance/contact daily and may be asked to report that information to the Ministry.”*** There was no evidence the District tracked student attendance/daily contact for the remote/off-site learning portion of the summer learning claims.

Specific to Summer Learning was the Summer School segment provided in the Stage 3 guidelines. Including the following:

“All programs should align with the B.C. curriculum and, in particular, delivery of grade 10-12 courses must ensure all learning standards are addressed. Courses should be claimed in accordance with the existing 1701 summer school process and would be funded at the current published rates, which includes supplemental funding for students who also qualify for English/French Language Learning, Indigenous Education and/or special needs funding.

*However, in accordance with the phased return to in-class instructions, school districts may blend the delivery of summer school between remote instruction (which may include the use of DL platforms) and in-class instruction. **Regardless of mode of instruction, summer learning will be funded based on actual enrolment...**”*. Verification of enrolment based on student participation in the remote learning mode was problematic without evidence of tracking.

The auditors found that:

- Four school-age Grade 8 to 9 students claimed for eight Summer Learning courses were verified as not attending at the Data Collection claim date of July 10, 2020.
- One Grade 1 to 7 student with a low incidence special needs supplemental claim was verified as not attending at the Data Collection claim date of July 10, 2020 nor was there evidence of special needs servicing for this low incidence claim. The audit team was directed by the District staff to review the Katzie First Nations school information which provided an overview of various instructional sessions. There was no evidence of the special needs services provided in addition to the funded Summer Learning educational option.
- One Grade 10 to 12 student claim with a special needs designation had no evidence of an IEP at the time of the claim nor of any parent consultation for this Summer Learning claim. The information from District staff was that the support team did not have an opportunity to draft an IEP and obtain meaningful parent consultation prior to October 2020.
- One Grade 10 to 12 student claim with an Indigenous services claim was verified as not attending at the Data Collection claim date of July 10, 2020 nor were indigenous supports provided for this Summer Learning claim. The District staff confirmed that against the wishes of their family, and efforts of staff, student did not attend.
- One Grade 1 to 7 student claim for indigenous services had no evidence of Indigenous Ancestry self identification at the claim date. The District confirmed entry was made in error for this Summer Learning claim.
- The District is to be commended for providing a Summer Learning opportunity to learners who were identified as “reluctant” to attend mainstream classes due to the Covid-19 school closures.
- For Grade 10 to 12 Summer Learning students had a range of full credit courses.
- Reported absences did not always align with the Permanent Student Record, Summer Learning report cards, or the Summer Learning attendance evidence.
- Discrepancies were noted between the residency information recorded on the student verification form and what was recorded in MyEdBC.
- The Summer Learning Programs varied depending on the age of the students. For students in Grades 1 to 6 the face-to-face teacher time was scheduled for 15 or 18 hours depending on

the group assignment. It was noted that for Grades 1 to 6 remote learning was not offered. The Grade 7 course offered was set up for 12 hours of face-to-face time with the teacher. Evidence failed to demonstrate how this educational option aligned with the minimum requirement of 40 hours as per the Form 1701 instructions for summer learning claims. Through the clarification process the District provided anecdotal commentary about extensions provided by individual teachers. Report card evidence and other documentation regarding the design of these courses did not identify how the required hours were achieved, how attendance was tracked, or how work done outside of the on-site time was evaluated. There was no evidence the District had a process for tracking remote student attendance.

- For the 2020/21 school year, the District continued a past practice regarding their Summer School Grade 7 to 8 Transition option. The students were identified as taking English Language Arts 7 (ELA7) yet it was verified the students were undertaking an ADST Information Technology course consisting of woodwork, metalwork and/or Information Technology (game design).
 - All reporting to parents identified the ADST Information Technology course. There was no evidence of information related to English Language Arts in those documents.
 - As the District uses MyEdBC for attendance and for the purpose of reporting claims through Form 1701, it was incorrectly determined there was no requirement to identify the specific course taken and opted to report course claims labelled with a placeholder identified as ELA7.
 - The District incorrectly reported the ADST Information Technology courses undertaken by the students as an ELA7 course on the Permanent Student Record for each student. Students were not reported for the ADST curriculum course they undertook.
 - The District's Summer Learning documentation outlined the fees to be charged to students attending some of the summer learning programs.
 - These fees were paid by parents at the beginning of the Summer Learning sessions.
 - The audit team were advised that on July 22, 2020 the Principal of Summer Learning requested the District's finance department to initiate a refund for all of the parents who had paid fees.
 - On July 24, 2020 emails were sent to the parents who paid fees to confirm that the District Education Office had decided to cover the elementary summer learning fees.
- Section 82 of the [School Act](#) identifies that a board must provide free of charge to every student of school age resident in British Columbia and enrolled in an educational program in a school operated by the board. Boards are not to be charging fees related to any eligible funded educational option (including summer learning). The reference from the [Summer Learning policy](#) also clearly states: *Summer learning courses must comply with Section 82 of the School Act, which requires boards to provide instruction in an education program sufficient to meet the general requirements for graduation, free of charge, to every eligible school-age student resident in British Columbia, as well as the educational resource materials necessary to participate in the education program.* Any eligible goods and services to be charged are beyond that which is necessary to meet the required learning outcomes or assessment requirements of an educational program provided by a board (Ref. [School Regulation 265/89](#)).

- The District is commended for involvement of the community in planning and delivery of Indigenous supports identified within the Summer Learning program. There was evidence of significant community involvement in the cultural and Indigenous language components of the program providing students with opportunities to learn and use local languages in everyday situations, participate in cultural activities, as well as identifying local and traditional plant and animal names.
- The District has a current Enhancement Agreement and undertook a number of collaborative advisory meetings with the Indigenous community to plan all aspects of the 2020/21 school year Summer learning Program.
- The District has a process to allow Indigenous students to self-identify for Indigenous Education supplemental services; this includes parent/guardian consultation as well as an opting out provision.
- Indigenous Programs or Services were offered at three Summer Learning sites.
 - Laity View Elementary School and Thomas Haney Secondary School were supported by an Aboriginal Support Worker who provided individualized services to students. Cultural activities were not offered due to the COVID Health and Safety Guidelines.
 - Katzie First Nation summer learning program was offered through a collaboration between the District and Katzie First Nation community offering a multi-grade, cross-curricular program that integrated language learning and the local culture. The Katzie First Nation Program used a model of embedded language and culture as the main components for their summer program.
- There was inconsistency in reporting out on Indigenous Education Program and Services. A number of dates of service and attendance were inaccurate, indicating service for students on dates when they were not in attendance. Tracking sheets indicated services were provided for “poor attendance” while the Attendance Report indicated “no absences”.
- There was evidence that the Indigenous Education Program at Laity View Elementary and Thomas Haney Secondary were in addition to the curricular program to which the students were eligible. The evidence for several students receiving academic and social-emotional services lacked detail and specificity.
- The Katzie First Nation program provided documentation which described both the Indigenous language and cultural services that students received, yet there was little detail of the learning/academic programs for English Language Arts and Math/Numeracy. There was no evidence or specific comments regarding the curricular program on student report cards. The District did not have demonstrable evidence regarding the details of the academic program that was to be in addition to the other programs/services offered.
- The Summer Learning program, taught at Katzie First Nation, offered Indigenous language classes for the students. To do this the District worked with a member of Katzie First Nation who was a recognized knowledge keeper of the Hənqəmiñəm language.
 - The contract was not signed until after the end of the Summer Learning program and was without evidence of a completed criminal records check.
- Evidence requested from the District for Special Needs Supplementary Services was generally well organized and the following information was found in the majority of student records:

- IEPs dated after September 30, 2019
- evidence of assessment and identification of Special Needs category designation
- evidence of Parent Consultation
- Most IEPs were comprehensive and included detailed individualized goals, adaptations, modifications, services to be provided and measures for tracking achievement. The names of personnel who were providing the educational program and the support services for the student during the school year were included in most of the student sample's IEPs. There was evidence of a year-end review, and/or a comment that related to continuation of goals.
- The majority of IEPs included information to support the student had been assessed and met the criteria of the Special Education category.
- Evidence specific to student Summer learning activities in accordance with the student's IEP was not readily available. Through the clarification request process, the District staff provided several Summer Learning Profiles for students with Special Education designations. The District staff provided a list of Summer Learning Educational Assistants who had been identified on the IEP but were not able to provide a detailed schedule or additional evidence. A few primary Summer Learning report cards had embedded IEP goals and provided required evidence.

Recommendations

The auditors recommend that:

- Should the District continue to report summer learning claims for funding, moving forward, the Ministry directives including the Form 1701 Instruction requirements for eligible educational options and minimum hours of instruction must be put into practice and followed.
- District staff ensure all Summer Learning students claimed for funding are enrolled and attending at the Data Collection claim date.
- District staff adhere to the eligibility of all Summer Learning options to ensure the courses align with the provincial curriculum. For eligible students enrolled and attending Grade 1 to Grade 9 courses, these must align with the provincial curriculum and are a minimum of 40 hours. Grade 10 to Grade 12 level courses are either four credit courses that meet all the provincial or board/authority authorized learning standards within the provincial curriculum offered for a minimum of 80 hours or partial credit courses that align with the provincial or board/authority authorized curriculum and are offered for a minimum of 40 hours.
- In addition to the Form 1701 Instructions, District is to ensure their policies, procedures and practices are in accordance with the Summer Learning Policy including providing instruction free of charge to any eligible students resident in BC. No tuition fees are to be charged for any funded student claims.
- District staff refrain from the past practice of using incorrect courses codes as “placeholder courses” and, moving forward, if choosing to report claims through their summer learning facility ensure required eligibility directives are understood and followed including the Form 1701 Instructions and the Summer Learning Policy.
- District staff establish a process to ensure the full and accurate record of student attendance including all summer learning claims and retain student attendance and participation evidence for all students claimed for funding.

- District ensure all summer learning course outcomes are identified correctly on all formal student reporting mechanisms and submit summer learning course enrolments and final marks in the October SADE file as identified in the [Summer Learning Policy](#): “All students attending summer school must be assessed and assigned a mark. The courses/programs and marks must be reported to the Ministry in the October SADE submission”.
- District staff ensure all information entered in the student files is accurate and consistent across all platforms and data sources including student residency information.
- For the Katzie First Nation program of services, the District staff establish a processes to ensure that documentation is accurate and adheres to the supplemental service requirements.
 - District staff ensure all supplemental claims for Summer Learning students meet the current directives and provide evidence that the supplemental service/supports were provided in addition to the funded educational program/courses.
 - District staff ensure documentation provides evidence that is specific to the individual’s supplemental services as well as the academic program being offered.
 - District staff ensure all required evidence for Indigenous supports and services are in evidence for each student as per the Form 1701 Instructions and the [K-12 Funding Indigenous Education Policy](#).
- District staff ensure safeguard procedures for employees and independent contractors are in place including criminal records checks prior to the start of assignments.
- District staff ensure each IEP is developed in accordance with the [Special Education Guidelines](#) and the [Individual Educational Plan Order](#) outlining learning activities and support services developed for the student and is current as per the Form 1701 Instructions.
- The District be scheduled for a return audit of their Summer Learning claims to ensure Ministry directives are adhered to.

Auditors’ Comments

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