



**Ministry of Education
Resource Management Division**

2020/21 Summer Learning Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 61 (Greater Victoria)

2020/21 SUMMER LEARNING ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 61 (GREATER VICTORIA)

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 courses claimed. For the 2020/21 school year boards of education were to report 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 the 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.61 (Greater Victoria) reported 147 summer learning enrolments.

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 Summer Learning audit was conducted in School District No. 61 (Greater Victoria) during the week of February 8, 2021. The auditors reviewed all 147 student claims.

An entry meeting was held remotely via Zoom on February 8, 2021 with the Secretary-Treasurer, Associate Superintendent, and the Summer Learning Principal to review the purpose of the audit and the criteria for funding as outlined in the Form 1701 Instructions and related Ministry

directives. The Superintendent and the District's IT designate did not join the session until after the meeting had concluded.

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 presented.

A virtual exit meeting was held on February 11, 2021 with the Summer Learning Principal, Secretary-Treasurer, Associate Superintendent, Superintendent and District's IT designate. At the exit meeting the auditors presented their preliminary findings.

Prior to the audit visit, the auditors undertook a verification of the summer learning-assigned teachers' status with the Teacher Certification/Regulation Branch (TRB). Of the seven educators the District indicated were teaching the summer learning options, all were verified as certified for the 2020/21 school year.

Observations

The 2020/21 school year Summer Learning directives required districts to only report student claims when the Summer Learning Data Collection directives (Form 1701 Instructions for Summer Learning) were met. The options were to be offered, attended, and completed by eligible students between July 1, 2020 and August 31, 2020. None of the claims reported by SD61's Summer Learning facility met this reporting requirement. The District chose to provide the educational options reported in the 2020/21 school from June 29, 2020 to July 9, 2020.

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 in-person attendance daily. A new attendance code “Onsite” has been developed within MyEducation BC. Attendance must be recorded with MyEducation BC daily using the OnSite code, for students that are on premises, beginning June 1 and for the remainder of the school year. A daily extract of OnSite attendance records will be provided to the Ministry. Districts have also been provided with the capability and instructions to extract this data for analysis and record keeping purposes.”*** There was no evidence the District utilized the MyEducation BC OnSite code to record attendance for their 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...***. Given the District did not utilize the required MyEducation BC code to record attendance, the review of these claims was problematic.

The auditors found that:

- District staff advised that the summer learning options were provided to students in a blended mode of in-class and virtual instruction. The in-class component was provided in two 2.5 hour sessions from 8:00am to 10:30am or 11:00am to 1:30pm (labelled in the evidence as SMR2-1 and SMR2-2 respectively). The virtual component was to be provided at a minimum of 3 hours. While there was a document presented as evidence of attendance for the in-class component, there was no evidence to verify the virtual component for any of the summer learning claims.
- The District's process for consideration of which students would take a summer learning option instead of through distributed learning was based on the District decision not to provide distributed learning this school year during the summer months. All summer learning students were to have taken the course before (to improve a mark or to achieve a passing grade not previously achieved) and all were to be provided with the in-school session for summer learning at Mount Douglas Secondary School. Evidence indicated a number of instances where the student had not taken the course before but were assigned an option determined by the educators to be aligned with certain competencies found in courses previously taken.
- Despite the Form 1701 Instructions for Summer Learning claims, the Summer Learning Policy and the K-12 Education Response to Covid-19 Guidelines, the District chose to offer 40 hour options during a timeline they determined was representative of the 2019/20 school year yet funding claims were made by the District in the 2020/21 school year.
- As none of the claims reported by the District met the Summer Learning directives, the challenge was how to ensure claims were eligible given the courses were only provided from June 29 to July 9; one day before the mandatory July 10 attendance date; several days before the July 17, 2021 Form 1701 reporting deadline; and, incorrectly reported as part of the previous school year's educational programming.
- There were a number of instances where the student data specific to attendance was unclear; and conflicted with other evidence documents including reporting the summer learning courses funded in the 2020/21 school year yet identified on the previous school year report cards and permanent record cards. This is contrary to the reporting requirements for the 2020/21 school year and does not align with the [Summer Learning Policy](#) requirement that *"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"*.
- To clarify attendance inconsistencies identified during the audit, the District staff advised that they were not aware that taking attendance was an area of concern. The District's

determination was that despite what was directed in the Covid-19 guidelines and the Form 1701 directives, their understanding was that students were deemed to be in attendance unless an absence was recorded. The guidelines for Stage 3 clearly indicated that school districts would be expected to track in-person attendance with a newly assigned MyEducation BC code beginning June 1st and for the remainder of the school year; additionally, that *regardless of the mode of instruction, summer learning will be funded based on actual enrolment.*

- As there was no evidence of course outlines/plans provided by the District to verify that courses were aligned with the provincial curriculum, attempts were made to determine how the summer learning courses were designed to meet each student's learning goals in the selected summer learning options. The District staff advised that the teachers looked to the curriculum of the course with a view to completing approximately half of the core competencies. The focus was on the competencies that were basic to the course along with additional learning that would best prepare a student for advancement to the next related grade level.
- There were a number of student claims where absenteeism appeared to impact the educational sessions; requiring clarification as to how the student could complete an 8-day duration course. The District advised that some students were able to collect the deliverables through other means such as direct contact with the teacher, Google classroom, a classmate, etc., and then complete the work either outside the regular class time, during regular class time and breaks, or in other instances after the regular school day had been completed. Students were to be responsible for all work deliverables assigned as part of the course and expected to complete the work in conjunction with, and/or in collaboration with the classroom teacher. Additional information relayed by District staff was that:
 - *“As courses were a blend of remote and in-person, students constantly had access to the materials/assignments;*
 - *In-person attendance requirement was a measure that we applied with the intent that it would maximize the opportunity for student success, rather than a measure of the student's participation in learning;*
 - *We knew prior to the start of summer school that individual exemptions to the in-person attendance requirement might be necessary to be responsive to the needs of individual students during COVID;*
 - *As a blended program, teachers did not restrict their communication with students to the hours of instruction (8:00-1:30). Within these hours students were guaranteed access to the teacher, but teachers did respond to students outside of this timeframe.”*

There was no evidence provided to support these procedures, nor examples of the expected work to be completed, or educator remote interaction. There were also a number of instances where student success was not achieved.

- The audit team also looked for clarification on completion of course learning in 40 hours when the secondary students had never previously taken the course. The information received from District staff was that likely these were exceptions that were missed during the enrolment considerations for summer learning students and related to Covid-19 which had a bearing on how the District staff were able to interact with the schools of record.
- Of the 20 Grade 9 student claims reviewed, three course claims were verified as without evidence of student undertaking the course and/or were confirmed by District staff that claim should not have been reported.

- Of the 127 Grade 10-12 student claims reviewed, 12 course claims were without evidence of students undertaking the course and/or were confirmed by District staff that claim should not have been reported.
- As the District had until July 17, 2020 to finalize their summer learning reporting, many of the claims for students who did not attend/participate could have been removed from the count.

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 timelines and eligible educational options 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.
- To improve overall operation in summer learning, consideration be given to assigning a consistent summer learning principal with a view to improving adherence to the requirements and a retained awareness and comprehension of the eligibility requirements. Rotating the oversight of summer learning from year to year did not appear to aid with ensuring consistency in operational procedures.
- 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 outside of their catchment area but still resident in BC. No tuition fees are to be charged for any funded student claims.
- The District revisit their current policies to ensure eligibility requirements are met including a focus on BC residency not just Canadian citizenship. The [Eligibility of Students for Operating Grant Funding Policy](#) provides direction in this regard.
- 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.

Funding and Financial Accountability Branch
Resource Management Division
Ministry of Education
March 8, 2021
