



**Ministry of Education and Child Care
Resource Management Division**

2022/23 K-12 Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 27 (Cariboo-Chilcotin)

2022/23 K-12 ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 27 (Cariboo-Chilcotin)

Background

The Ministry of Education and Child Care 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 and Child Care annually conducts Kindergarten to Grade 12 (K-12) 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 2022/23 school year, boards of education reported a total of 560,346.9379 FTEs in Kindergarten through Grade 12. School District No. 27 (Cariboo-Chilcotin) reported a total of 4,692.5000 FTEs or 4,726 students, including 34 students for English Language Learners (ELL) and 1,456 students for Indigenous Education.

Purpose

The purpose of the K-12 Enrolment audit is to provide assurance to the Ministry of Education and Child Care 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 Enrolment audit was conducted in School District No. 27 (Cariboo-Chilcotin) during the week of January 16, 2023. The schools audited were:

- Lake City Secondary School (LakeCitySec)
- Skyline Alternate School (SkylineAlt)
- Peter Skene Ogden Secondary School (PSOsec)
- PSO Outback Storefront (PSOOutback)

The total enrolment reported by these schools on September 29, 2022 was 224.3125 FTE, of which 228 student files were reviewed. The review was extended to include all reported students in one secondary school for analysis when a school-wide issue was identified by the audit team.

An entry meeting was held on January 16, 2023 with the Superintendent and each school's Principal along with the Deputy Superintendent, three Directors of Instruction, District Principal–Indigenous Education, District Principal–Career Education, Director of Human Resources, and the Administrators and Lead Educators of the Alternate schools 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 their observations. The audit team followed a process in each school which gave the staff opportunities to locate and present additional evidence when the team found that such evidence was not available in the evidence presented by the schools.

An exit meeting was held on January 20, 2023 with the Superintendent, Deputy Superintendent, three Directors of Instruction, District Principal–Career Education, District Principal–Indigenous Education and the Director of Human Resources. Administrators of the Alternate Education Program facilities, Lake City Secondary and Peter Skene Ogden Secondary attended remotely. At the exit meeting the auditors presented their preliminary results and clarified any outstanding issues.

The audit included the enrolment reported in the 2022/23 school year. The areas audited were:

- September 29, 2022 enrolment and attendance verification
- Ordinarily Resident
- Secondary School Course Claims
- Alternate Education Programs
- Adult Student Claims
- Indigenous Education Supplemental Claims
- Post-Secondary Transition Programs with Post Secondary Institutions and Industry Association partners
- Other Career Program Courses

Prior to the audit visit, the auditors undertook a verification of the school-assigned teachers' status with the Teacher Regulation Branch.

Observations

The auditors found that:

- All District staff were accommodating, readily available and worked hard to provide information requested by the auditors in a timely manner.
- Student schedules generated for the audit were dated October 13, 2022 which required a review of the Student Course Change History (add/drop summary) to determine the number of courses eligible for funding. The team reconciled the documents to determine the final course count. District will be implementing a new process for the next school year that will have additional controls and oversight with required sign offs and data manager approvals.
- At Peter Skene-Ogden Secondary there were instances where the evidence did not include verification of BC residency.
- Absences on the report cards, the attendance history, and the class attendance lists did not always align. This was more prevalent in situations where there were frequent absences.

- 19.8750 school-age FTEs claimed for funding at one of the secondary schools were enrolled and attending classes taught by non-certified individuals. It was verified that two instructors were without certification by the Teacher Regulation Branch (TRB) which led to a systemic review of the FTE claims. It was confirmed that neither of the individuals had received their certification/letter of permission at the September 2022 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 Director of Human Resources explained that, typically after an applicant has been interviewed, staff search the TRB website to ensure the teacher is certified and reference checks are conducted. If the teacher is certified and the reference checks are supportive, the candidate is offered a position. In some instances where it is difficult to fill the position, a non-certified teacher could be offered the position on the condition they apply to the TRB for a Letter of Permission (LOP). Non-certified teachers are provided with two documents: “How to Apply for a LOP” to guide them through the application process and a link to the “Standards of Conduct”. In the case of these teachers, both failed to apply in a timely manner after they had been hired and did not submit applications for certification until December 2022.
- 9.0000 school-age FTEs at the secondary schools were not enrolled and/or attending as at September 29, 2022. In accordance with the [Form 1701 Instructions](#) students are to be reported by the education facility with which they are enrolled and in attendance as at September 29, 2022. In this instance, despite the schools’ best efforts to connect with the students involved, they did not attend and were not participating in their program as of the claim date.

Alternate Education Program Facilities:

- 5.0000 school-age FTEs reported by the Skyline Alternate Education Program facility were without evidence to meet the requirements of the Alternate Education Program Policy which says: “*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*”. Additionally: *Alternate education programs must satisfy certain requirements to be deemed a type Three facility. If the programs meet those requirements, then their students qualify for 1.0 FTE (full time equivalent) funding to the school district. 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.* For these claims there was no evidence of students receiving differentiated instruction, specialized program delivery, or enhanced counselling services specific to each student’s needs, nor of

individualized clearly defined objectives, recognition of additional services each student required, what progress is/was made, transition planning nor exit strategies.

- 6,000 school-age FTEs claimed were not in attendance nor was there evidence to meet the requirements of the Alternate Education School Program Policy.
- The PSO Outback program is skill-based, and the students were eager to share their individualized programs. Staff at PSO Outback were passionate about their work and were creative as they endeavoured to engage students to meet their academic, social and emotional needs.
- Staff at Skyline were extremely helpful in providing information in response to requests from the auditors and were curious about the process.
- CCWRAP had originally been a separate and distinct program. It has now been incorporated into the Alternate Education Program at Skyline. The CCWRAP program identifies some of the most vulnerable youth and finds pathways for their future. The District is encouraged to further explore and utilize the potential of this resource when creating Student Learning Plans and community supports.
- Documented evidence of support and programs for Alternate Education Program students was limited and at times challenging to identify.
 - The intake process was often inconsistent and the reason for referral to an Alternate Education Program was not clear. Intake forms were often not signed or dated; many were only partially completed; and most did not include the reason for the referral, or identify the agencies supporting each student. There was no evidence of a transition plan or exit strategy.
 - Student attendance was a fluid process especially in Alternate Education Programs. There was little to no follow up nor a consistent process for follow-up with chronic non-attenders.
 - In some instances, residency and guardianship evidence was not evident on the Student Verification Form.
 - Student Learning Plans were often brief and non-instructive. There were very few Student Learning Plans that included dates and signatures.
- Staff were eager to provide a healthy structured environment for students that captured the requirements of an Alternate Education Program placement. The staff welcomed the requirements for evidence, support and follow-up provided by the audit team, as there was limited knowledge of the requirements.

Indigenous Education Programs/Services

- The District Principal for Indigenous Education shared the following regarding District programs and services.
 - Framework for Enhancing Student Success:
 - District-wide learning about Truth and Reconciliation. Last year there was a workshop hosted by Kevin Lamoureux of the National Centre for Truth & Reconciliation (NCTR). All staff were given the Speaking Our Truths book by Monique Grey Smith. This year there was an all staff workshop by Monique Grey Smith about relationships and caring. Phyllis Webstad worked with all staff and were gifted Phyllis' book Beyond the Orange Shirt Story. The District also has an Indigenous Professional Development offering on every scheduled Professional Development day.

- Intentional implementation of the First People’s Principles of Learning (FPPL) – the Indigenous Education Department have begun a learning series at the school level from the teachings of FPPL from Wayi Wah! by Jo Chrona.
- Ensuring proper welcome signage is in each of the District school sites and have begun to build elder programs into the schools (process was slowed due to COVID).
- The Indigenous Education Department has completed library reviews and have a resource centre whereby teachers can search online for local authentic teaching resources.
- The Indigenous Education Department meets monthly with each Nation that has a signed Local Education Agreement.
- Local Education Agreements (LEAs) – the District currently has seven signed agreements, one is in the negotiation stage and three that are currently being strategized as to how to meet the needs of the Nations involved.
- All of the programs offered through targeted funding are discussed at the First Nations Education Committee table including:
 - a) Programs and services
 - i. District Principal of Indigenous Education and Department Secretary
 - ii. Language programs – ten language teachers servicing 11 schools
 - iii. Indigenous Support Workers (ISW) – 26 ISWs servicing 18 to 24 schools. Schools not having an ISW receive cultural supplement dollars.
 - iv. Two District transition workers supporting both transitions from rural communities and from elementary to secondary schools
 - v. One curriculum/resource development teacher
 - vi. Professional development offerings at each Professional Development day
 - vii. FNEC proposal system to apply for culturally significant events at the school level
 - viii. Starting an elder in school programs
 - ix. Role model contest
 - x. Poetry contest
 - xi. Training for all Principals and Vice Principals on the LEAs
 - xii. Focus area page on the District website to celebrate work in a positive way
 - xiii. Transition trips with Thompson River University to promote post-secondary options and to ease with transitions
 - b) Implementation of significant projects
 - i. Medicine wheel projects at three sites
 - ii. Orange shirts for every staff and student
 - iii. Digital art display at every school site
 - iv. Welcome signage project at each school
 - v. Welcome back drumming at ten locations
 - vi. Culture rooms created at both high schools
 - vii. Every Child Matters signage
 - viii. Elder poster series
- Consent forms are sent home annually as a District process to confirm self-identification.
- All District schools were actively involved in Orange Shirt Day activities in September 2022.

- Despite the significant work of the Indigenous Education Department, evidence documenting supports and programs to individual school-age students was limited, challenging to identify and did not always reflect cultural and/or academic opportunities.
- 66 students claimed as receiving Indigenous Education Programs and/or Services were verified not to have received any services and/or support in accordance with the [K-12 Funding-Indigenous Education policy](#) and the [Form 1701 Data Collection Instructions](#) which says:

*“For **a student** to be reported as receiving an Indigenous Education Program or Services, all of the following must be met:*

 - ✓ *Evidence that the student has self-identified as being of Indigenous Ancestry (First Nations, Métis, or Inuit).*
 - ✓ *Evidence that the parent or guardian of the student has been consulted.*
 - ✓ *Evidence that the Indigenous Education Programs or Services have involved the Indigenous communities in planning and delivery*
 - ✓ *Evidence that the Indigenous Education Program and Services are in addition to any other programs and services to which the student is eligible.*
 - ✓ *Evidence that the Indigenous Education Programs or Services provide a continuum of substantive learning experiences and/or support services throughout the school year.*

A plan for the delivery of these Indigenous Education Programs and/or Services must be in evidence at the time of the September 29, 2022 claim.

Career Programs

- 1.1250 school-age FTEs were without evidence to meet the Youth Work in Trades (WRK) directives.
- Students in the District have opportunities to participate in a wide variety of work placements.
- There was a well-resourced Career Centre at Lake City Secondary School, highlighting the value placed on Career exploration experiences for learners.
- The well-organized, detailed checklist contained in the WRK student files was underutilized and in many cases was not followed.
- In the various Career Programs, there was inconsistent reference to program names on the various forms/booklets/application forms: Heavy Equipment Service Technician, Heavy Duty Mechanic and Heavy Mechanical all refer to the same program.
- Program Education Planner (PEP) used in the Career Education Department were often incomplete (no student name, no program name, no career program direction, no student and/or parent signatures, etc.) and were not up to date.
- Work Experience training plans did not always identify the specific course name (i.e., WEX 12A or WEX 12B).
- Work Experience (WEX), Youth Train in Trades (TRN) and Youth Work in Trades (WRK) course marks were not reported on mid-term (semester) report cards.

Grade 10 to 12 Student Course Claims

- 0.3750 school-age non-graduated FTE at Lake City Secondary were verified to be duplicated course claims reported in error.

Special Education

- The student files in both Lake City Secondary and Peter Skene Ogden Secondary Schools were generally well organized.

- The Instructional Support Planning document was often used to gather information about the strengths and needs of the students.
- The Competency Based Individual Educational Plans (IEPs) for the students at Lake City Secondary were an effective way to communicate with parents and students regarding progress on the goals and objectives.
- The Form, *British Columbia Evergreen Certificate* is used at Lake City Secondary to inform parents that the School Completion Certificate (aka Evergreen) is not the same as the Dogwood Certificate of Graduation. The consent for a child recommended for the School Completion Certificate is signed by Parents, Teacher, Principal and Director of Inclusive Education.

Recommendations

The auditors recommend that:

- The District staff put processes in place to ensure all funded FTEs are educational options provided by BC certified teachers.
- Schools claim only those students who are enrolled and attending at the Data Collection claim date.
- For Grade 10 to 12 school-age students, schools report only those eligible courses that are scheduled on each student's timetable as at the Form 1701 claim date, including evidence to verify the eligible Grade 10 to 12 funded courses.
- The District staff ensure the accuracy of all student timetables, student attendance and verification of BC residency by their schools.
- Schools review the protocols for recording student attendance on all documents used for tracking purposes ensuring absences are consistent.
- The District staff ensure there are current agreements with their post-secondary partners and that those partners are only those who are a member of the BC Transfer System or an Industry Training Authority/Skilled Trades BC certified Youth Program training provider.
- The District's Career Program staff undertake a program-wide reassessment of their record keeping practices (i.e., incomplete forms, lack of dates, missing signatures, etc.) to ensure that the files are complete and established protocols are consistently followed.
- The Career Program staff realign their naming procedures ensuring consistency in the labelling of the various trades options.
- A revision of the Program Education Planner (PEP) process be undertaken to ensure the Planners are up to date, complete and consistent.
- Work Experience Training Plans templates be reviewed to identify the separate and distinct courses (WEX12A and/or WEX12B).
- The District staff review the Student Learning Plans (SLPs) of the non-special needs students reported as attending Alternate Education Program facilities. On an annual basis, to align with the annual school year funding claim, SLPs are to clearly define objectives for the student, additional services to be provided to the student, progress made towards the student's goals and any transition plans. The policy also requires Alternate Education Programs to provide support through differentiated instruction, specialized program delivery, additional services and enhanced counselling services based on students' needs. Students reported as receiving an Alternate Education Program must have the required service provision in addition to that which would be provided in a traditional school.

- The Alternate Education Program facilities are encouraged to establish consistent practices to accurately track student attendance and implement plans to encourage students to return to school.
- For funded student claims, the District staff ensure that for school-age students along with their parent/guardian BC residency is confirmed and recorded on the Student Verification Form.
- The District staff ensure that only those students provided with supplemental Indigenous Education support programs and/or services in accordance with Ministry directives are reported for supplemental funding.
- The District ensure schools retain evidence of the Indigenous Education Programs and Services provided to each student reported as receiving one or more of the following three categories of supplemental service.
 - *Indigenous Language and Culture Programs – there must be evidence that students are receiving a program leading to knowledge and understanding of Indigenous language and/or culture.*
 - *Indigenous Support Services – there must be evidence that students are receiving a program intended to assist Indigenous students to achieve success in school by providing support services. Services should be provided by personnel who are familiar with and sensitive to, the values, beliefs and needs of the Indigenous community from which the student comes.*
 - *Other Approved Indigenous Programs – there must be evidence that students are receiving a program developed, defined, approved, and delivered through a shared decision-making process between the board of education and the Indigenous communities it serves.*
- The District staff ensure that a plan for the delivery of Indigenous education programs/services is in evidence at the time of the Data Collection claim date (Ref. Form 1701 Instructions).
- The District and school staff explore ways to retain per-student evidence that the Indigenous education programs/services are *in addition to any other program and service which an Indigenous student is eligible* (Ref. K-12 Funding-Indigenous Education Policy).
- A comprehensive professional development plan be developed in conjunction with the Indigenous Support staff to ensure District direction, information and policies are shared.
- The District staff consider revising internal practices for the annual parent/guardian notification to reflect information about and consent to programs/services for the current school year.
- The District’s Inclusive Education team ensure each student’s IEP has documented evidence that the student is receiving special education services to address the needs identified in the assessment documentation that are beyond those offered to the general student population and are proportionate to the level of need.
- In addition to comments within the IEP regarding support being available from the Educational Assistants, the Learning Services Teachers or other support personnel, it is suggested that a current timetable outlining who is supporting the student and when the support is provided is retained in evidence.
- The District staff be required to undertake a compliance workshop to aid school-based staff with training on the current eligibility directives and the importance of tracking supplemental support provided to students.

- A return audit be scheduled to ensure the Ministry directives identified are put into practice.

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 and Child Care
February 9, 2023**
