



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

2022/23 K-12 Enrolment Audit

AUDIT REPORT

REVISED June 14, 2023

SCHOOL DISTRICT No. 61 (GREATER VICTORIA)

2022/23 K-12 ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 61 (GREATER VICTORIA)

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. 61 (Greater Victoria) reported a total of 20,013.5027 FTEs or 19,544 students, including 2,111 students for English Language Learners (ELL) and 1,474 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. 61 (Greater Victoria) during the week of January 30, 2023. The schools audited were:

- Spectrum Community Secondary
- S.J. Burnside-Alternate
- Victor School-Alternate

The total enrolment reported by these schools on September 29, 2022 was 1,262.1250 FTEs, of which 268 student files were reviewed. The review was extended to include all reported students for analysis as school-wide issues were identified by the audit team.

An entry meeting was held on January 30, 2023 with the Secretary-Treasurer, a Deputy Superintendent, an Associate Superintendent, each school's Principal, the Director and the Counsellor of Indigenous Education, the Vice Principal-Career Programs, and the Information Technology Director to review the purpose of the audit and the criteria for funding as outlined in the Form 1701 Instructions.

For each of the schools audited, a segment of the students reported in the 2022/23 school year were selected for review.

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 district/school 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 3, 2023 with the Superintendent, Secretary-Treasurer, Deputy Superintendent, Associate Superintendent, the Information Technology Director, the District Principal-Inclusive Education, each school's Principal, the Vice Principal of Spectrum Community School, the Director and Counsellor of the Indigenous Education Department, a Victor School District Team member, and the District's Vice Principal-Careers. 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
- English Language Learning Supplemental Claims
- Indigenous Education Supplemental Claims
- Post-Secondary Transition Programs with Post Secondary Institutions and Industry Association partners
- Other Career Program Courses
- District Created Academies

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:

- The District's Indigenous Education Department shared the following regarding District-wide programs and services:
 - The District staff are developing a comprehensive framework for Indigenous Support and Wellness to create a standard of practice throughout the District.
 - There is a strong leadership team in the Indigenous Education Department who are providing in-service to support the implementation of the framework.

- The District has Local Education Agreements with both the Songhees and Esquimalt Nations, an Education Agreement with the Métis Nation and Terms of Reference with Urban Peoples' House Indigenous Advisory.
- The District staff have initiated a five part learning series that examines culturally responsible learning environments by walking alongside the work of Indigenous staff for all district staff.
- Despite the significant work of the Indigenous Education Department, evidence of supports and programs to individual school-age students claimed for the supplemental servicing was limited, challenging to identify and did not always reflect cultural and/or academic opportunities. As outlined in the [K-12 Funding-Indigenous Education policy](#) and the [Form 1701 Data Collection Instructions](#):

*“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.

- At Victor School, the audit team worked with the District’s Indigenous Services team to identify individualized service provision for all their Indigenous Education supplemental student claims.
- At SJ Burnside Alternate facility eight supplemental student claims were recommended for recovery:
 - For one student claim evidence identified student was not of Indigenous ancestry.
 - For one student claim there was evidence of declined service.
 - For three student claims there was no evidence of supplemental service provision.
 - For three student claims there was no evidence student was attending nor receiving any supplemental service as at the claim date.
- At Spectrum Community School five supplemental student claims were recommended for recovery. It was verified that there was no evidence students were attending nor receiving any supplemental service as at the claim date.

Victor School – Alternate Education Program Facility

- The review of Victor School highlighted the in-depth special education programs offered to students with complex needs. The school is comprised of a stand-alone program focused on students with multifaceted special needs. The School is categorized as a Type 3 Facility/Alternate Education Program but is not currently operating as such. Victor School is currently focusing on its transition from a special education centre to a more inclusive model where students with other needs will be provided with the necessary services for an Alternate Education Program.

- Currently Victor School is offering an alternative for their student population but does not meet the requirements of an Alternate Education Program facility. The students have an IEP specific to their Special Education challenges, but for the majority of the students, do not focus on any social/emotional issues and did not clearly define the objectives for the student, additional services provided as required, progress made, and any transition plans that are unique to their needs in addition to their special education designation and the supplemental services aligned with the respective designations. There was also no evidence of the required exit strategy to facilitate the students' transition out of the school. There was no evidence of additional services as required (i.e., youth workers, drug and alcohol counsellors and/or sessions, etc.) that are not found in a traditional school environment.
- 7.0000 school-age FTEs reported by the Victor Alternate Education Program facility were without evidence to meet the requirements of the Alternate Education Program Policy which says: "To be Type Three facilities, *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 educational 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*". 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.* For these claims there was no evidence of students receiving differentiated instruction, specialized program delivery, enhanced counselling services specific to each student's needs, individualized clearly defined objectives, recognition of additional services each student required, progress made, transition planning nor exit strategies as discrete services in addition to the supports and services required aligned with their special education designation.
- 2.0000 school-age FTEs claimed by the Victor Alternate Education Program facility were not in attendance nor was there evidence to meet the requirements of the Alternate Education School Program Policy.

Victor School – Special Education Supplemental Services

- While the disconnect between an "alternative" special education school and the requirements for an Alternate Education Program resulted in the reported Grade 10 to 12 and Secondary Ungraded headcount adjustments, the review of the special education supplemental claims met the criteria in accordance with the Special Education Manual of Policies, Procedures and Guidelines, with the exception of two Code D student claims verified as not attending. One student was out of the country and one student's entry into Kindergarten was deferred to the 2023/24 school year.
- The School's *Inclusive and Competency-Based Individual Plans* included detailed information about medical needs and background information specific to each student.

- The Student Support Team for each IEP reflected wide consultation from a parent/guardian, school-based staff, district staff and pertinent outside agencies.
- The School is using *Competency Based Progress Reports* to communicate with parents based on the goals and objectives stated in each student's IEP. This includes a proficiency scale to show student progress.

SJ Burnside Education Centre – Alternate Education Program Facility

- The primary issue encountered when attempting to verify Alternate Education Programming was specific to the Student Learning Plans (SLPs) which were not aligned with the Alternate Education 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 student's transition back into regular school system, continuing education centre, graduation or to work or post secondary training and education.*
 4. *Evidence of additional services as required by the student population (i.e. youth workers, drug and alcohol counsellors and/or sessions, etc...)*

It was difficult to ascertain the reasons for the Alternate Education Program placement. The School's version of an SLP was stated as being an initial SLP which is completed with the student and their case manager at the beginning of the year, or shortly after intake. This document was academically focused and did not provide the information required for an SLP which clearly defines a) the objectives for the student, b) what additional services are/will be provided (by whom and when) c) measurement of student progress, and many did not have the required proposed transition plan.

- As none of the files in the sample contained the required evidence, an interview process was undertaken with the lead auditor and the SJ Burnside team as well as the Link staff. Some clarity was offered through the interview process, but often did not fully provide the required details for a Type 3 Facility.
- 1.0000 school-age FTE claimed by SJ Burnside was verified as non-resident with parent/guardian not residing in BC.
- Students enrolled at SJ Burnside were able to choose between direct instruction or self-paced courses.
- Attendance reports at SJ Burnside as well as Link were inconsistent across documents (month/day/period/report cards, etc.). This could be resolved with a MyEdBC workshop where district and school staff explore the use of the MyEdBC Journal function to record dates and the purpose of meetings, telephone conversations, student and parent consultations and programs and service provided to students. There was a course selection form done as part of the yearly re-intake.
- Intake provided from a District Based Team (DBT) meeting was the first step in the District's process for placement. These documents were provided as evidence for why students were placed in the Alternate Education Program but consistently lacked specific information about why students were there. It was explained to the audit team that these forms/documents are shared with parents and as a result are kept positive in nature. These

documents were generally outdated (most dated 2019 or 2020) and no longer contained pertinent information for the current school year.

- The School provided a form which was their mid-year review of the students' learning plans. These forms rarely added any clarity to the reason for the students to be attending an Alternate Education Program. These documents were generally done with students and case managers, and in many instances the students indicated that they received less support than the school had stated on their 'proof of service document'. This included comments like "never" and "I don't know this person". This particular document did not meet the requirements for a student learning plan (SLP) however the school should be commended for doing regular check-ins with their students.
- A proof of service document was provided as a printout (with the student in question highlighted). The Student Services Chart is filled in by case managers, counsellors, and administrative staff, on a weekly basis. This form provided inadequate evidence as to the specific services provided for students. The form had weekly notations such as "CI" (Check In) yet no specificity around what type of service the student received nor on which dates they received it. Added to this, the student attendance indicated absences during those weeks, which further exacerbated linking required services for students.

SJ Burnside Education Centre – Special Education Supplemental Services

- One Intensive Behaviour Intervention or With Serious Mental Illness Category (Code H) student claim was verified as not attending at the claim date nor was there evidence of support services aligned with the category claimed.
- One Moderate to Profound Intellectual Disabilities (Code C) student claim was verified as not attending at the claim date nor was there evidence of support services aligned with the category claimed.
- One student claim met the criteria for the Moderate to Profound Intellectual Disability Category, resulting in the Code D student claim to be reclassified to Code C.
- The attendance data provided often indicated that the students were not in attendance by the September claim date requiring the Vice Principal to review attendance sheets and check-in sheets provided by the classroom teachers for clarification.
- It was not always evident in the IEPs that students were receiving special education services nor by whom. For the IEPs there was little evidence provided that the students met the requirements for a Type 3 facility. Staff were unable to define the difference between the services for these students in the Alternate Education Program facility and how those might be different from what would be provided for students with special education designations within a traditional school.
- Many of the IEPs were academically focused. The objectives and strategies recorded on many of the IEPs were not clearly stated. Some of the strategies outlined a project rather than learning strategies.
- For the Intensive Behaviour Intervention or Serious Mental Illness (Code H) claims, there was not always current evidence in the student's file outlining the presence of integrated case management and wrap around services across agency and community.

Spectrum Community School – BAA Courses

- The District offered credit towards graduation and claimed funding for a number of courses where there was limited evidence available to verify the creation and/or approval as a Board Authorized course in accordance with the current Ministry requirements. The [Board Authorized Course Order](#) M285/04 says: "A board may not offer a Board Authorized Course

to students as meeting the Minister's requirements for graduation until the superintendent for the school district and the board have approved the Board Authorized Course in the manner and form required by the Minister. No Board Authorized Course shall be offered for use in a school as meeting the Minister's requirements for graduation until the board (a) on receipt of a request of the superintendent for that school district, approves the Board Authorized Course, (b) has submitted the required information in the manner and form required by the Minister" ...and from the [BAA Requirements and Procedures Guidelines](#): "Approval Process for Board/Authority Authorized Courses – Schools must have the approval of their Superintendent and Board...prior to offering a BAA course".

- Many of the BAA framework documents provided to the audit team lacked approval dates, were without the required signatures and in some instances without the development date. While the school staff relayed that the majority of the re-crafted BAAs were approved by the Board on May 29, 2019, no complete BAA framework versions were provided to the audit team. In accordance with the BAA Guidelines:
 - *Board/Authority BAA Approval Process Schools must have the approval of their Boards of Education or Independent School Authorities prior to offering a BAA course, regardless of whether the course has already been approved in another jurisdiction.*
 - *Step 1: Submit the completed BAA Course Framework along with the BAA Course Form to the Superintendent for approval/signature.*
 - *Step 2: Superintendent submits the approved BAA Course Framework along with the BAA Course Form to the Board for approval/signature.*
 - *Step 3: Board retains a copy of the framework for the Ministry upon request.*
 - *Step 4: Boards send an electronic copy of the BAA Course Form to the Ministry at EDUC.GradStandards@gov.bc.ca.*
 - *Step 5: Boards ensure that schools are reporting the course with the same course title (as approved by the board) and with the same four or five letter course code (i.e. YVPA), as indicated on the BAA Course Form.*
 - *Step 6: Boards are to review BAAs on a set cycle and/or as needed due to changes in provincial curriculum. If not revised, those BAAs that do not meet requirements are to be delisted by the Board.*

Spectrum Community School – Career Options

- The School Board offers students a wide variety of Career Education options including Work Experience, Train in Trades, and Youth Work in Trades, single as well as full program Post-Secondary Transition courses. Students are well supported with a half-time Career Coordinator and Career Centre Assistant in every secondary school, as well as a knowledgeable District team and District Vice Principal. The Spectrum Community School's Career Centre is a welcoming, bright space. In the majority of cases the auditors found the required evidence available in student files.
- **Transition plans**, when required, were mostly complete. As per the *Recognition of Post-Secondary Transition Programs for Funding Purposes policy*, students in post-secondary transition programs must annually update and sign a planned program of courses. This program plan is to list their transition program courses, including when and where they will be taking their post-secondary courses.
- **Train in Trades** program directives require registration forms to be completed identifying the sponsor and signed by the District. There were instances where forms were incomplete.

Post-Secondary Transition Options

- The School offers several single course post-secondary transition options based on the current student body interests and if there is the ability to create a full class. This year the School offered Psychology, Art Studio and Kinesiology courses by Camosun College. The District teacher and the Camosun instructor co-teach the overlapping curriculum between the Ministry Authorized option and the post-secondary courses. The students then attend Camosun College for labs and other activities that cannot be undertaken at the District's school.
- While not all were completed, there was evidence each student had a transition plan. Most plans were not annually updated/signed for the current school year and the plans did not include information about when and where the students would be taking their post-secondary courses.
- 0.5000 school-age non-graduated FTEs were verified to be the result of overstated Post-Secondary Institution course claims. In accordance with the Recognition of Post-Secondary Transition Programs for Funding Purposes Policy *"For the reporting of modular courses...representing a dual-credit transition program through the 1701 data collection process, consider each four credit course as approximately 120 hours."*
- 0.1250 school-age non-graduated FTEs were verified to be a Post-Secondary option claimed in error.

Spectrum Community School - Grade 10 to 12 Student Course Claims

- 4.4375 school-age Grade 10-12 FTEs claimed for funding had evidence of non-attendance at the claim date.
- 6.4375 school-age Grade 10 to 12 FTEs claimed for funding were enrolled in and/or attending fewer courses than reported at the Data Collection claim date.
- 0.1250 school-age non graduated FTE was reported for funding as an Independent Directed Studies (IDS) option. Review verified student undertook an external credential course over the summer. The facility was not a member of the BC Transfer System, option was not an eligible IDS in accordance with the [Graduation Program Order](#), nor was there evidence of district educator oversight. While option could be recognised for credit, it was not eligible for funding at the claim date.

Spectrum Community School – Special Education Supplemental Services

- One Code G claim was claimed for a student attending a full time Horticultural program at a Post-Secondary Institution from July 2022 to April 2023. Without evidence of special education services or attendance at the claim date the claim was recommended for declassification.
- One Code D claim was recommended for declassification. Evidence verified student was independent with their diabetes management and was attending a full time post-secondary program.
- The IEPs for students with a Code F, Deaf or Hard of Hearing designations were comprehensive in the information included in the objectives and strategies sections.
- Many of the IEPs were not dated but included a print date date/time in January 2023. Generally IEPs are to be written and the meetings take place in the fall term to maximize opportunities for student learning.
- Some of the IEPs did not include details about the staff such as Education Assistants or Learning support teachers, etc., who provide support to the students.

Spectrum Community School – English Language Learning Supplemental Services (ELL/ESD)

- The audit team met with Principal and Vice Principal to clarify information required. The Vice Principal provided a scanned version of summary assessment comments which did not identify the actual assessment.
- The audit team shared that a copy of the most recent annual assessment was needed for each student along with a schedule of support services provided to each student outlining when support was received. Clarification was required to verify if the only ELL service students received was via a ELL Learning Strategies BAA course. Funded courses which are part of the student’s annual education program are not a supplemental service.

Recommendations

The auditors recommend that:

- Schools review the protocols for recording student attendance on all documents used for tracking purposes ensuring absences are consistent.
- Schools claim only those students who are enrolled and attending as at the Data Collection claim date.
- For secondary students, schools report only those eligible courses that are scheduled on each student’s timetable as at the Form 1701 claim date, including accurate evidence to verify the eligible funded courses.
- The District ensure that all educational options labelled as IDS courses meet the requirements in accordance with the definitions in the [Graduation Program Order](#) (M302/04):
 - the student initiates, develops and completes their own areas of study in an educational program related to or an extension of one or more of the learning outcomes of Ministry-Developed or Board/Authority Authorized Grade 10, 11 or 12 courses.
 - the independent directed study is initiated by the student and undertaken in accordance with (1) a plan developed by a teacher and a student; (2) the number of credits is set out in the plan based on complexity and amount of work required; and (3) approved by a principal, vice principal or director of instruction.
 - the independent directed study is carried out by the student under the general supervision of a teacher.
 - students receive no more than four credits for the course.
- The District ensure that only eligible student FTEs are claimed for career options and that the students are receiving an educational program and instructional component in accordance with all Ministry directives related to the career options including evidence to verify those claims.
- The District must either ensure secondary alternative options are reported in accordance with the criteria for secondary school-age course based funding or take steps to follow all of the requirements in the Alternate Education Program Policy being met when reporting in subsequent school years. The Form 1701 Instructions define Alternate Education schools – Type 3 facilities as those that: *“focus on the educational, social and emotional issues for those students whose needs are not being met in a traditional school program. An alternate education school provides its support through differentiated instruction, program delivery and enhanced counselling services based on student need.”*

- The staff of the Alternate Education Program facilities be required to develop Student Learning Plans aligned with the Alternate Education Program requirements in addition to identifying courses the student requires to graduate. It is further recommended that the school implement a more reliable attendance tracking system.
- The District staff ensure students reported as receiving an Alternate Education School Program have the required service provision in addition to that which would be provided to the general District's school student population. In accordance with the [Alternate Education Program Policy](#): *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.***
 - To align with the annual school year funding claim, Student Learning Plans must be reviewed annually and contain objectives for the student, additional services to be provided to the student, progress made towards the student's goals and specific 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. The documentation is to demonstrate the specialized education adaptations and individualized support in accordance with the Policy directives: *"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**".*
- In consultation with the Indigenous Education leadership team were the following considerations needed to continue the culturally responsible learning environments:
 - That the Board and School District support a transition into a shared responsibility of a shared reporting template that is co-developed with the Indigenous Education Dept that would document the evidence of the supplemental services being provided to Indigenous students.
 - That the Board and School District provide evidence and highlight the programs and services offered to every school on each schools website so that Indigenous parents and students have direct and regular access to the programs at the school they are attending.
 - That the Board and School District continue to work and support the Indigenous Education Department on ensuring that Targeted Funds for Indigenous Students are not being used to replace core educational programs to what a student is entitled to receive as part of their core educational program, and to ensure that this is done with the Indigenous Education Department who are responsible for the Targeted funds for Indigenous students they claim.
 - That the Board and School District where possible provide core educational funds to the Indigenous Education Department to support the training and capacity building required that will enhance the district staff capacity in areas that Indigenous Education staff may

- be asked to support that are in addition to the requirements of the Targeted funding, i.e., Training for staff in Data Entry that support the data entry for Supplemental requests.
- That the Board and School District where possible work with the Indigenous Education Department to find ways to develop a process with the IT department to develop an easier access for direct access for Contact information of Indigenous parents or guardians that does not require having the Indigenous Education Department having to go through school by school information for this contact information.
 - 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 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 ensure that students who do not self-identify as being of Indigenous Ancestry are not claimed for supplemental funding.
 - The District staff ensure that eligible students who chose to opt out of the provision for Indigenous Programs and/or Services; and/or whose parents indicate the student is not to take part in the programs are not claimed for supplemental funding.
 - The District ensure that a plan for the delivery of indigenous education programs/services are in evidence at the time of the Data Collection claim date and that only those individual students provided with Indigenous Education support programs and/or services in accordance with Ministry directives are reported for supplemental funding.
 - All school staff are reminded to ensure the directives of the [ELL Guidelines](#) and Form 1701 Instructions are adhered to including the following:

In order to qualify for Supplemental Funding for English Language Learning support services, there must be, for each student reported:

 1. *documentation of a current annual English (French*) language proficiency assessment, dated after September claim date of the previous year, confirming that the student's use of English (French*) is sufficiently different from standard English that he or she is identified as requiring specialized services to develop intellectually, to develop as a citizen and to achieve the expected learning outcomes of the provincial curriculum;*

2. *evidence that a current annual instructional plan is in place, dated after the September claim date of the previous year. The instructional plan must be designed to meet the needs of the student or groups of students as identified in their English (French*) language proficiency assessments;*
3. *evidence that an ELL (ALA*) 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);*
4. *evidence that additional ELL (ALA*) services are being provided. These services might include pull-out services, specialist support to a classroom teacher or teachers' assistant, and/or additional services provided in a regular classroom environment. When students receive adaptations within mainstream classrooms, there must be documentation that these adaptations address the ELL (ALA*) needs identified in the student's English Language (French Language*) proficiency assessment;*
5. *a schedule or list documenting the ELL/ALA* services provided by an ELL/ALA* specialist teacher, teacher or teacher's assistant;*
6. *documentation of the student's progress in the acquisition of English (French*) proficiency in all Student Progress Reports.*
 - *Speech Language Pathology services and other non-ELL (non-ALA*) specific services are not considered to be additional services for purposes of the Form 1701 report. Reduction of class size is not enough service to meet the definition of ELL services.*
 - *A plan for delivery of ELL (ALA*) support services must be in evidence at the time of the September 29, 2022 claim.*
 - *For secondary students there must be some evidence of support services in September although it may be appropriate to increase the level of service in the second semester based on scheduling of the student's courses or course load. Service that is deferred entirely to a later time (i.e., there is no support or planning in evidence at September 29) will not be funded.*
 - *Funded courses and support blocks are not to be used as the sole method for English Language Learning or Indigenous Education support services.*
- The District schools ensure that the requirements for supplementary ELL funding as set out in the Form 1701 Instructions and ELL Policy and Guidelines manual are met before each student is reported for this supplemental funding.
- The District ensure all PSI transition claims for school-age students align with the rationale and directives of the [Recognition of Post-Secondary Transition Programs for Funding Purposes Policy](#). The students begin taking the post-secondary courses that are part of their transition program during their Grade 11 or Grade 12 year. The student's post-secondary transition plan indicates why various post-secondary options are being taken (and funding eligible) and aligned to the student's future post-secondary or trade objectives once the student has left the secondary school system. Offering to provide a student with PSI course options not required for the specified post-secondary credential outlined in the transition plan falls outside the purpose of qualifying dual credit to support the student's transition to a specific occupation.
- The District ensure the accuracy of all reporting claims before remitting for funding, including student timetables, student attendance and verification of residency in B.C. by their schools. Moving forward to assist with ensuring accuracy, the relevant District staff be required to undertake a MyEdBC Compliance workshop.

- The respective District staff be required to undertake a compliance workshop specific to Alternate Education Programming to ensure there is systemic knowledge of the requirements for a Type 3 Facility.
- The District be scheduled for a return audit in the 2023/24 school year to review all Alternate programs and services.

Auditors' Comments

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