



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

2022/23 K-12 Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 68 (Nanaimo-Ladysmith)

2022/23 K-12 ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 68 (Nanaimo-Ladysmith)

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. 68 (Nanaimo-Ladysmith) reported a total of 14,917.6250 FTEs or 15,314 students, including 927 students for English Language Learners (ELL) and 2,511 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. 68 (Nanaimo-Ladysmith) during the week of February 13, 2023. The schools audited were:

- Learning Alternatives-Alternate
- Career Technical Centre
- John Barsby Secondary
- Qwam Qwum Stuwixwulh Community School

The total enrolment reported by these schools on September 29, 2022, was 1,183.3125 FTEs, of which 265 student files were reviewed. The review was extended to include all reported students for analysis when school-wide issues were identified by the audit team.

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

An entry meeting was held on February 13, 2023 with the Superintendent and each school's Principal, an Administrative Assistant, Executive Assistant-Learning Services, two Assistant Superintendents, two Directors of Instruction-Inclusive Education, Director of Instruction-Learning, Director of Instruction-Indigenous Learning and a Deputy Superintendent to review the purpose of the audit and the criteria for funding as outlined in the Form 1701 Instructions.

The audit team visited each school to review student files, interview staff, and conclude on their observations. The audit team followed a process in each school which gave 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 17, 2023 with the Superintendent and each school's Principal, an Administrative Assistant, two Assistant Superintendents, two Directors of Instruction-Inclusive Education, Director of Instruction-Indigenous Learning, Deputy Superintendent and CAO of the Snuneymuxw First Nation. 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
- Kindergarten to Grade 7 Claims
- Secondary Course Claims
- Alternate Education Programming
- Adult Student Claims
- Special Education Supplemental Claims
- English Language Learning Supplemental Claims
- Indigenous Education Supplemental Claims
- Reciprocal Exchanges
- Post-Secondary Transition Programs with Post-Secondary Institutions and Industry Association partners
- 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:

- 4.5000 school-age Grade 10 to 12 FTEs claimed for funding were enrolled in and attending fewer courses than reported at the Data Collection claim date. The [Form 1701 Instructions](#) states *"To obtain funding for school-aged students, boards of education must meet the following criteria:...report the student's annual plan of courses leading to graduation in which the student was enrolled and in attendance as at September 29, 2022.*

- In a selection of instances, a suite of four courses proposed to run in two blocks were claimed for funding with a single educator assigned. It was verified that only two courses were provided.
- 4.0000 school-age Grade 10 to 12 FTEs were claimed for a support block which did not meet the requirements of a support block. In accordance with the Form 1701 Instructions, *“Each support block is to be considered equivalent to the 120 hours of instruction of a regular 4-credit course. Instructional service is provided and documented by a teacher, regular attendance is expected, and does not include independent study time, drop-in sessions, voluntary study halls, tutorial sessions or **time spent solely on a course(s) from another school.**”*
 - For 1.3750 school-age Grade 10 to 12 FTEs there was evidence that a selection of students reported with support blocks were only undertaking actual course work for those courses also reported for funding at the District’s Island Connect Online Learning Centre. It was verified enrolments were for the sole purpose of providing time in the timetable for students to work only on their online courses. Students in Grades 10 to 12 enrolled in online courses with Island Connect were reported by the secondary school for a support block. It was verified that the session was staffed by only online teachers as well as an Educational Assistant who was also an online staff member. The only role the reporting secondary school played in the delivery of this funded session was to provide a physical classroom and the timetable function to place them in the course.
 - For 2.6250 school-age Grade 10 to 12 FTEs there were support block claims where the total number of courses plus support blocks exceeded eight claims.

P.15 of the Form 1701 Instructions states: *“a support block is for non-special needs, school-aged, non-graduated students in grades 10-12 and SU engaged in their learning at structured times **in addition to their annual academic or regular program courses provided in all schools and are taking fewer than 8 courses. The combined total number of support block and courses leading to graduation cannot exceed 8 for these students**”*. While the requirements also identify that students taking online learning courses may be claimed for one funded support block per student per school, this is only eligible as long as the other requirements are met.

- 0.3750 non-graduated adult FTEs reported for funding in the Alternate school did not meet the attendance and course requirements for adult claims. In accordance with the [Adult Funding Policy](#) *“Attendance is defined to be over one reporting period AND either 1) a minimum of 10 hours of instruction in a classroom or learning centre for each course or a demonstrated completion of 10% of the course requirements OR 2) meets the Grade 10-12 active requirements as outlined in the DL Active Policy.*
- 7.0000 school-age FTEs were without evidence of attendance at the claim date:
 - 3.0000 school-age FTEs reported by the Alternate Education Program facility.
 - 4.0000 school-age Grade 10 to 12 FTEs at the Secondary school.
 Two student claims were additionally reported as receiving supplemental Indigenous programs/services and three student claims additionally reported as receiving special education supplemental support services. It was confirmed that these non-attending students did not receive any supplemental program and/or support services.
- 1.0000 school-age Grade 10 to 12 FTEs reported as enrolled in a Youth Train in Trades (TRN) program was claimed in error. It was verified that the student undertook the program of courses in the previous school year.

- 15 TRN files were reviewed:
 - Generally, the programs were well managed and files were well organized.
 - The transition plans reviewed for TRN programs often lacked specific details including the location of the TRN program, start/finish dates and specific occupation.
 - Report cards for students in TRN programs did not communicate midterm marks to students and parents.
- Claims for post-secondary courses were undertaken as a method of offering a sampling of academic learning in a post-secondary environment.
 - 51 students were claimed for these individual courses.
 - The application process allows students to select from a wide number of courses available at Vancouver Island University.
 - Many of the funded claims for academic options had no alignment with the specific occupation identified (i.e., Pediatrician, Physiotherapist, Psychiatrist).
 - While it was verified that many claims had been funded for students taking and time-tabled for three to four individual courses to be provided by the post-secondary institution, most students dropped two of the courses by December.
 - In some instances the District's Career Dual Credit Program information was outdated, and the hours were not aligned between documents.
 - Some student evidence contained conflicting information regarding instructional hours, number of courses, and program content.
- 0.2500 school age Grade 10-12 FTEs were verified as duplicate courses. Several instances were found where students were timetabled for the same course in both semesters (i.e., Math 10, PE 10, English 12 and Photography 12). This was explained as an inexperienced counsellor issue. At the time of the audit, in most instances, students had a new course for the second semester. In one instance, the student had left the school with no courses undertaken. The claim was for two Photography 12 courses, both scheduled in the second semester.
- For Youth Work in Trades (WRK) claims:
 - Five of the ten WRK files reviewed did not contain separate and distinct training plans for each course claimed.
 - Items such as evidence of payment for work placements, sponsor's name, and Work Skills BC/ITA agreements were not in student files.
- The School Board's Policy (AP 224 – Career Preparation Programs: adopted April 28/1993) is outdated and does not meet the guidelines outlined in the Ministry's [Recognition of Post-Secondary Transition Programs for Funding Policy](#) in addition to the current [Youth Work in Trades Guide](#) and the [ITA Train in Trades Program Guide](#).
- The review of the secondary school's supplemental Indigenous Education Programs/Services claims verified that their AIMS program was underutilized by some of the assigned staff.
 - Three staff members were assigned to support the students reported as receiving Indigenous services. One of the staff members has been on long-term leave. The position remained vacant when the current school year's Fall Data Collection was reported.
 - There was a lack of attendance for a number of Indigenous students in September with minimal evidence of efforts made to encourage the students to attend.
 - There was minimal evidence of services/supports for those students claimed as receiving supplemental Indigenous services. It was verified that there was a meeting for Grade 8 and Grade 12 students, along with Elder Lolly providing weekly drum activities. As there

was no tracking of attendance, it was challenging to ascertain which students participated. There were instances where students were not in attendance at the school which was contrary to the supplemental service participation evidence provided.

- It was verified that the Indigenous Support Teacher (assigned to a 0.714 FTE position funded through the targeted funding) was also assigned to two teaching blocks which were for the delivery of for-credit courses leading to graduation. In September 2022 the Indigenous Support Teacher position became fulltime. The audit team were advised that this impacted the provision of Indigenous programs/services.
- Eight student claims were without evidence of Indigenous Education supplemental programs/services. Two of which were also without evidence of attendance at the claim date.
- It was verified that the Indigenous programs/services at the Alternate Education Program facility were frequent cultural and support programs. There was evidence that all the Indigenous supplemental offerings to the students started early in September and were continued each month. The Indigenous support services staff at Learning Alternatives Alternate facility did an exceptional job of tracking indigenous support/culture programs for students.
- **Qwam Qwum Stuwixulh Community School** - The stunning Indigenous design of Qwam Qwum School warmly welcomes and honours the children and the school community.
 - This unique school design is co-governed and operated between Snuneymuxw First Nation and School District No. 68. The school is located on Snuneymuxw First Nation territory and the audit team were honoured to have had the ability to share in their culture and have a smudging ceremony.
 - The staff and community's care and support for the students was evident.
 - All 60 files reviewed were well organized and complete.
 - The staff are to be commended for the regular, frequent and extensive use of English Language assessments to inform classroom practice and strategies for additional support.
 - Indigenous supplemental programs at Qwam Qwum Stuwixulh Community School demonstrated the Indigenous community involvement throughout the school (meal programs paid for by the community, community coaches for sports, etc.).
 - Staff provide information in both Hul'q'umin'um' and/or English.
 - All District staff value and appreciate the traditional, unceded territory they work on.
 - All education partners value the unique situation at the Qwam Qwum School and are invested in its success.
 - As attendance can be a challenge for students, the District staff are trying to find ways to encourage student with attendance and leadership through participation in traditional ceremonies such as the Big House.
 - The Indigenous student file sample evidence verified students have meaningful learning support in language, culture, and academics.
 - One challenge for the school is obtaining residency and communication evidence.
- The School Board has six Academies: Fine Arts, Jazz, Hockey, Soccer, Lacrosse, and Volleyball.
 - There was no evidence for the PAC to annually approve the academies. Per *School Act* Sec 82.1 a board may offer a specialty academy if the school planning council for the school approves the academy after consulting with the school's PAC.

- A board may charge a student fee relating to the direct costs incurred by the board that are in addition to the costs of providing a standard educational program. Before establishing a schedule of fees, a board must consult with the school planning council, of the school offering the academy, and obtain PAC approval for the schedule of fees.
- On or before July 1 of each school year boards must establish a schedule of fees to be charged and make the fees available to the public. The one in evidence was dated for the 2019/2020 school year.
- The fee directives above apply only to a board that has established policies and procedures to enable all students of school age ordinarily resident in BC who would otherwise be excluded because of financial hardship. At the time of the audit there was no evidence of a Board created financial hardship policy (as per School Act Sec.82.4).
- Only those school-age students verified as ordinarily resident in B.C. along with parent/guardian are eligible for funding (Ref. [K-12 Funding-General Policy](#)).
- From the supplemental English Language Learning (ELL) evidence reviewed, the District is to be commended for its consistent expectations and systematic approaches to documenting and delivering support services for the secondary English Language Learners.
 - Teachers have appropriate background and training.
 - The program offers a variety of options for refugee students, new immigrants, and those requiring English as a Second Dialect (ESD) support.
 - There are two ELL Board/Authority Approved (BAA) courses for the secondary school. Some of the ELL students were enrolled in the BAA courses but are also provided with the required supplemental ELL supports in addition to the funded educational program.
 - Approximately 50% of the current students are identified as receiving ESD supports (most are in Grade 8 and 9 approaching the end of the five-year supplement eligibility). The work done with the students was concentrated on revising written work, brainstorming, and breaking learning components into smaller parts.
- The Learning Alternative Alternate facility provided notable evidence of the work that they do to keep this vulnerable population in school, towards graduation and self-sustainability.
 - The facility has begun the process of establishing procedures to ensure all practices/procedures/documents are aligned with Ministry requirements.
 - Of the 43 students audited there were three adjustments for non-attendance.
 - The school has established a summer session (July and August) to keep the students engaged and returning the following year.
 - The Alternate Education Program facility has positive graduation rates (70 to 80 graduates/year).
 - The Alternate Education Program facility's current Student Learning Plans are written for public consumption and did not contain adequate information consistent with the requirements of a Type 3 Facility. Detailed documentation in confidential records detailing the reasons for the student's acceptance in the alternate program, the support that they are receiving, and the dates of when and by whom these services are provided by are to be in evidence aligned with the Alternate Education School Program Policy.
- The Special Education Annual Learning Supports documentation provided a comprehensive overview of the services provided by the school, district, and community agencies. Overall, the organization of the Special Education files was commendable and the majority of the files were complete.

- Several student files referencing mental health and specific diagnostic reports were not always in evidence.
- Four student claims were recommended for declassification:
 - Three student claims were without evidence of attendance nor support services aligned with the criteria.
 - One Code H student claim was without evidence to meet the criteria for the current year.
- The three exchange agreements reviewed met the eligibility requirements.

Recommendations

The auditors recommend that:

- Schools claim only those students who are enrolled and attending as 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 eligibility of the Grade 10 to 12 funded courses.
- The Alternate Education Program facility align all aspects of the Student Learning Plans to meet the Type 3 facilities requirements. These plans need to clearly define the objectives for the student that cannot be met in a traditional school, additional service requirements (including when the services are provided and by whom), progress made and a transition plan.
- As regular attendance was challenging for some students, documenting the means staff use to maintain regular contact with students and their parent/guardian is to be in evidence. In cases where students are not able to attend school, documentation could include outreach to the student at home to provide academic, cultural and social-emotional support during absences.
- The District staff ensure that only those students provided with Indigenous Education support programs and/or services in accordance with Ministry directives are reported for supplemental funding.
- The District staff review the consistency of the data recorded on the AIMS program to ensure all Indigenous supplemental services/programs for each student claimed are recorded as required.
- The District is encouraged to build on their current successes and discover ways to acknowledge student participation in traditional ceremonies (i.e., the Big House) to further support student attendance challenges at Qwam Qwum Stuwixulh Community School.
- The staff and community partners at Qwam Qwum Stuwixulh Community School work together to establish processes for obtaining residency and communication evidence.
- The District staff ensure targeted funding be assigned appropriately and aligned with Ministry directives. Targeted funding derived from supplemental Indigenous supports/services is not to be used for the delivery of funded BAA or Ministry courses.
- The District's Inclusive Education staff ensure that Form 1701 reporting is verified prior to submission and that student files are updated and reviewed regularly through an annual designation renewal process to ensure the students meet the special education criteria in the category in which they are claimed for the reported school year.

- The District's Inclusive Education staff report only student claims in Code H when the evidence is aligned with the Special Education Guidelines including evidence of coordinated planning across agency and community and integrated case management.
- The District's Inclusive Education staff consider implementing a process for standardizing the organization of special education files.
- The District's Inclusive Education staff ensure that IEPs have transition goals where appropriate and that all objectives have a method of measurement and regular reporting on goal/objective achievement.
- The District's Inclusive Education staff ensure that all designated student claims reported on the Form 1701 Data Collections are enrolled and attending as at the claim date.
- The Career Technical Centre staff review and update the post-secondary institution application forms to ensure all required information is documented and in accordance with the current directives.
- The District and the career assigned staff ensure all post-secondary institution transition claims for funding align with the directives of the [Recognition of Post-Secondary Transition Programs for Funding Purposes Policy](#). For eligible post-secondary institution claims, the result is dual credit: credit is recognised towards the student's planned program to graduation and post-secondary credit is achieved for the unique curricular requirements for the specific occupation or career pathway identified by the student in their transition plan.
- The Career Technical Centre staff ensure all reporting of four credit courses for the TRN programs are claimed correctly including the number of courses reported for funding. As stated in the Recognition of Post-Secondary Transition Programs for Funding Purposes Policy: *For the reporting of modular courses (i.e., 12A thru 12J) representing a dual-credit transition program through the 1701 data collection process, consider each four credit course as approximately 120 hours.*
- The Career Technical Centre staff update the current transition plan in their TRN application package to incorporate all the required information including location of the TRN program, start/finish dates, and specific occupation in accordance with the Recognition of Post-Secondary Transition Programs for Funding Purposes Policy: *Students in post-secondary transition programs annually update and sign a planned program of courses. This program plan lists their transition program courses, including when and where they will be taking their post-secondary courses.*
- Moving forward the District staff tasked with TRN and WRK programs ensure all information is currently dated and the hours are in alignment between all documents. Additionally that the dual credit options be re-examined to ensure accurate data is reported and Ministry requirements are met.
- The District and the career assigned staff collaborate with their partnered post-secondary institutions to establish protocols for reporting out of student progress on report cards.
- The Board Policy (AP 224 – Career Preparation Program) be revised to meet the current Ministry guidelines and requirements outlined in the Ministry's [Recognition of Post-Secondary Transition Programs for Funding Policy](#) in addition to the current [Youth Work in Trades Guide](#) and the [ITA Train in Trades Program Guide](#).
- The District staff ensure all adult students are only claimed for funding when the directives as outlined in the [Adult Funding Policy](#) are met, including eligible courses and evidence aligned with meeting the attendance requirement.

- District schools cease the use of reporting funded support blocks unless the educational services are aligned with the current Form 1701 instructions by the school claiming the support block, including *time spent solely on a course(s) from another school*.
- District schools ensure that all course claims for Grades 10 to 12 funding meet the requirements for per course funding.
- The District review their BAA “Social Emotional Learning 11” course to ensure it aligns 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 ensure curriculum is in accordance with the [BAA Requirements and Procedures Guidelines](#): *BAA courses are not: Courses with significant overlap with provincial curriculum content: This includes adapted courses, partial versions of Ministry courses, and hybrids of two or more Ministry courses. Remedial courses or those preparatory in nature: For example, a math course designed to help students who have completed Foundations of Mathematics and Pre-calculus 10 that provides review and remediation before they enrol in Foundations of Mathematics 11; or a writing course designed to help students develop the skills needed to meet the learning standards of Creative Writing 10. A modified course: For example, a social studies course designed for Grade 10 students with intellectual disabilities with significantly different learning standards from Ministry Social Studies 10. An adapted course: Adaptations are teaching and assessment strategies specifically designed to accommodate a student’s needs so they can demonstrate that they are meeting the learning standards of the curriculum. A student working to meet learning standards of any Grade or course level may be supported through use of adaptation.* Further, ensure the approval guidelines are also met: *“Approval Process for Board/Authority Authorized Courses – Schools must have the approval of their Superintendent and Board...prior to offering a BAA course”*.
 - *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.*

- Aligned with the Ministry directives for Academies, the District staff ensure that the *School Act*, the [Specialty Academy Criteria Regulation 219/08](#) and the “goods and services” segment of the [School Regulation 265/89](#) are met including. **82.1(1)***In this section, “specialty academy” means an educational program that emphasizes a particular sport, activity or subject area and meets the prescribed criteria set out in the regulations.*

(2) A board may offer a specialty academy if (a) the board has consulted with the parents' advisory council for the school where the board proposes to offer the specialty academy, and (b) the board is of the opinion that there is sufficient demand for the specialty academy.

(3) A board that offers a specialty academy must (a) make available sufficient instruction for students enrolled in the specialty academy to meet the general requirements for graduation, and (b) continue to offer a standard educational program in the school district.

(4) Despite section 82, but subject to section 82.4, a board may charge a student enrolled in a specialty academy fees relating to the direct costs incurred by the board in providing the specialty academy that are in addition to the costs of providing a standard educational program.

(5) On or before July 1 of each school year, a board that offers a specialty academy must (a) establish a schedule of fees to be charged under subsection (4), and (b) make the schedule of fees available to the public.

(6) Before establishing a schedule of fees under subsection (5), a board must (a) consult with the parents' advisory council for the school where the specialty academy is offered, and (b) obtain the approval of that parents' advisory council for the schedule of fees.
- The District staff establish a financial hardship policy to align with Sec.82.4 of the *School Act*: **82.4** *Sections 82 (3), 82.1 (4), 82.2, 82.3 and 82.31 (3) apply only to a board that has established policies and procedures to facilitate participation by students of school age ordinarily resident in British Columbia who would otherwise be excluded from the course, class or program because of financial hardship.*

Auditors' Comments

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