



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

2022/23 K-12 Enrolment Audit

AUDIT REPORT

REVISED JUNE 14, 2023

SCHOOL DISTRICT No. 78 (Fraser Cascade)

2022/23 K-12 ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 78 (Fraser Cascade)

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 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. 78 (Fraser Cascade) reported a total of 1,702.6875 FTEs or 1,705 students, including 93 students for English Language Learners (ELL) and 652 students for Indigenous Education.

Purpose

The purpose of the K-12 Enrolment audit is to provide assurance to the Ministry of Education 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. 78 (Fraser Cascade) during the week of December 5, 2022. The schools audited were:

- Agassiz Centre for Education-Alternate (ACE)
- Fraser Cascade Continuing Education (FC-CE)
- Fraser Cascade Open Learning (FC-OL)
- Two Rivers Education Centre-Alternate (TREC)

The total enrolment reported by these schools on September 29, 2022, was 71.6875 FTEs, of which 87 student files were reviewed.

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 December 5, 2022 with the Superintendent (Balan Moorthy) and each school's Principal (Greg Lawley-ACE and Margaret Smiley-OL, CE and TREC) as well as Bernard Klop (District Counsellor), Glenda Gaudette (Inclusive Education Vice Principal), Shalegh Moorthy (Inclusive Education District Team Lead), Jennifer Wright (Inclusive Education District Team Lead), Joanne Kovanchak (District Counsellor), and Brandon Provencher (Indigenous Service Worker, TREC) 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 and school staff opportunities to locate and present additional evidence when the team found that such evidence was not available in the documentation presented.

An exit meeting was held on December 9, 2022 with the Superintendent and each school's Principal (Greg Lawley and Margaret Smiley) as well as Glenda Gaudette (Inclusive Education Vice Principal), Shalegh Moorthy (Inclusive Education District Team Lead), Jennifer Wright (Inclusive Education District Team Lead), Joanne Kovanchak (District Counsellor), Mel Dunster (Secretary TREC), Nolan Irwin (OL Teacher), Jessica McKerrow (Inclusive Education Vice Principal), and Brandon Provencher (Indigenous Service Worker, TREC). 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
- School-Age Grade 10-12 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
- Special Education Supplemental Claims

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:

- 31.0000 school-age non-graduated FTEs reported as receiving an Alternate Education program were without evidence to meet the requirements of the Alternate Education Program Policy. In accordance with the Alternate Education School 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. For these FTE claimed, 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 or what progress is/was made. For most students there was a basic indication of a transition/exit plan on their Intake Form. This was also an outcome from the School Board's 2019/20 audit report and remains an issue of ineligibility and lack of service/supports to the students reported.

- 6.0000 school-age non-graduated FTEs claimed were not in attendance nor was there evidence to meet the requirements of the Alternate Education School Program Policy.
- 1.0000 school age FTE reported as receiving a funded Alternate Education Program was not ordinarily resident in British Columbia. Evidence verified this student along with their parent/guardian were resident outside of British Columbia. In accordance with the [K-12 Funding General Policy](#) *“To be eligible for provincial funding, Boards of Education must ensure that students are: ordinarily resident in BC (and where applicable for school-age students) with their parent/legal guardian”*. This was also a finding from the School Board's 2019/20 audit report.
- Attendance was an overarching issue at each Alternate school examined. There was a misalignment with the attendance information from MyEdBC and the classroom records. It was difficult to clarify the accurate attendance for each student. Problematic attendance tracking was also a finding from the 2019/20 audit and remains an issue.
 - At TREC students have different expectations for attendance. Some students are not expected to attend regularly (working full or part time, permission to be offsite, different expectations by program). Each TREC teacher uses a different format to collect student attendance. This information is then transferred to MyEdBC, but the data is not always accurate. There was evidence of some information created specifically for the audit.
 - TREC uses an “offsite” designation for students who are given permission to not attend the Alternate school on certain days. Students remain at home or at work. There is no oversight by the school for the students who are recorded as offsite. Students are marked present when “offsite” even though it was noted by staff that the students rarely engage in doing school work. It was not possible for “offsite” students to have access to their required supports.
- The TREC Principal advised that a decision was made approximately 15 years ago to divide the students into three program areas: Junior Alternate, Senior Alternate and EXCELL. The students were to work with different teachers in separate classrooms. There are different expectations for attendance and support based on program placement (four days versus five days). There was no current explanation as to why students do not need to attend on Friday except that when the program originated 15 years ago, the time was used by educators to meet with outside agencies. The meetings with outside agencies on Fridays has not occurred in the past decade. There was no evidence to support how this “traditional” attendance expectation aligns with the required expectation for support and/or services.
- The EXCELL Program was designed for, and attended by those children designated by the school as Students Requiring Intensive Behaviour Intervention/or with Serious Mental Illness (Code H). Students identified with multiple needs are only required to attend four days per week.

- There was no formal intake process used to facilitate District referrals or self-referrals to the Alternate Education Program. Each school has a unique set of guidelines and processes for student intake which are not deployed consistently.
- The intake process currently used at TREC has created a misalignment of requirements ensuring students are enrolled prior to starting their educational program. Students are expected to set up part of their own intake meeting and arrange for their parents to attend.
- At TREC there was no evidence of specialized program delivery, or enhanced counselling services based on the individual student's needs which are not being met in a traditional school program. Students in the Alternate Education Program were placed in an online Moodle course (identical to the OL students). Some students were provided with a paper-based copy of the course as well. Evidence provided showed that students "log in" when they are in attendance. Some students log in from home and are considered in attendance unrelated to any Covid measures used by the District. There was no evidence of differentiated instruction where lessons were adapted to meet each student's individual interests, needs, and strengths. There was no evidence of the provision of choice or flexibility for students based on their individual learning style. The evidence for student engagement in courses towards graduation appeared to be the same as that of a traditional school program.
- At TREC Student Learning Plans (SLP) were labelled as "Student Learning Agreements" which provided a basic format for a course list, school schedule and a personal goal. The form is signed by the school/parent/student but does not offer the space or layout to provide the required information for an SLP. Even though this form is available, it is not used regularly, and when used it lacks the specificity of the information required. In accordance with the Alternate Education Program Policy, students must have an IEP (required for SE designated students) or SLP created by the school which clearly defines a) the objectives for the student, b) what additional services are/will be provided, including evidence of additional services as required by the student population (i.e., youth workers, drug and alcohol counsellors, etc.) measurement of student progress, and d) any proposed transition plan.
- Not all services stated as being provided had proof of having begun. In some instances, information was provided about services for a student but was later confirmed not to have been initiated.
- The Student Learning Agreement used at ACE was more informative and used a different format which provided information about the supports required but did not indicate who was responsible for the supports (who/what/when). TREC Alternate uses an Intake/Rationale/Exit log form when students enroll. There is provision on the form for Interagency support, Alternate Education Programming, planned and active courses, reason for referral, etc., yet, the data provided was generally incomplete, blank, or so outdated that the information was no longer relevant.
- TREC's Alternate Education classes do not start at the beginning of September. The first week when students are to be in session was used by staff to write IEPs, SPLs, and to complete organizational tasks like intake interviews.
- The District staff noted that as a smaller district there were few options for students who are not successful in a traditional high school program. Some students require an alternative yet when reported as being provided with an Alternate Education Program the service provision does not meet established criteria as to what an Alternate Education Program is.
- At ACE a selection of students were found to be enrolled in continuous learning from year to year with continuous progress to be monitored by the school.

- Grade 12 students were undertaking CLC in a secondary school.
- Inconsistent attendance records were not recorded on student report cards.
- The majority of the SLPs were not signed by the school staff, parents or student.
- Three students did not have an in-take form.
- Evidence of service was minimal and lacked specificity. With some effort the school was able to provide limited evidence of support specific to the students' needs.
- At TREC the one classroom had an Education Assistant in attendance who was working with students, providing academic work, and evaluating assignments. The Principal clarified that due to the demands of the job she was unable to attend the classroom regularly. In conversation with the Education Assistant, it was noted this individual worked with the students, supervising their learning, doing some of the assessments, as well as taking students off site for their Physical Education program without the teacher.
- 43 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.

This was also an outcome from the School Board’s 2019/20 audit report.

- The District has a vision and specific supports for Indigenous students and is working toward future programs that address the needs of students, staff and the greater community. Both an Enhancement Agreement and a Local Education agreement are in place. Overall, the District has:
 - Implemented reading programs that infuse Indigenous curriculum into their classrooms.
 - The District Principal of Indigenous Education is working to bring more Indigenous language instruction to the District.
 - Funds have been provided for anti-oppression project books.
 - Two representatives from the Indigenous Education Council are appointed to Board Standing Committees and one representative from the Indigenous Education Council is appointed to the District Administration Committees.
 - There was no evidence of this support at the two Alternate Education Program sites due to staffing issues and not placing a substitute in the position.
- In an attempt to obtain any information that would support evidence of Indigenous Services/Supports for each student claimed, the audit team met with the Indigenous Education

District Principal, and the newly hired Indigenous Service Worker for TREC, on December 6, 2022.

- During the meeting it was shared that events such as producing Bannock and Orange Shirt Day were part of the District's plan for the delivery of Indigenous Education Programs/Services for the 2022/23 school year. Additionally shared was that the staff are trying to find activities designed for Indigenous Education.
- Further explanations were provided about the background and cultural pieces impacting the District's catchment area including 59 languages with only three being fluent currently. Background about residential schools and the loss of language and culture was shared. The District Principal imparted her background as a teacher along with when the District Principal came to the current role "*there was a lot of work ensuring program area is on their healing journey and that teachers need to feel more connected*". The District Principal said it is known that the newly hired Indigenous Service Worker has knowledge of a wide range of cultural activities and what a great role model the individual would be for the students. The District Principal communicated that she and the Indigenous Service Worker are learning the cultural pieces together. For specific cultural activities, the District Principal said the District has travel informed practices and that there are a high number of student absences.
- As the current Indigenous Service Worker was not hired until after the Fall Data Collection Date, it was again reiterated by the audit team that the task was to identify whether students were getting the support/services claimed by the District. Online learning students were verified to be without service, yet the conversation continued as to what evidence of service is/will be provided to the students at TREC. The District Principal again referenced Bannock making and that the food was for everyone but that next month (January 2023) District would be starting trauma informed practice, sharing further that: "*the importance is that our kids come from traumatic experiences and the food is important for the brain to be able to process trauma.*"
- While processes may be in place for a proposed District program, it was repeated that the audit team were looking for evidence that students actually attended any activities/programs/services. Whether academic, cultural or language supplemental service the task was to find evidence students actually attended. During the conversation it was confirmed that TREC did not have anyone in place to provide Indigenous programs/services/supports and was confirmed by the District Principal this offer was refused by the TREC Principal. This resulted in students not receiving services.
- Further conversation was specific to the challenge of filling the position of Indigenous Service Worker for the Online and Alternate Education programs until October 17, 2022. Questions were also posed to clarify the District practice of enabling an opt in/opt out of Indigenous service provision which is only done when a student changes schools.
- At ACE there was no evidence to verify supports/services for the students reported by the District as receiving Indigenous supports/services prior to the September claim date nor at the time of the audit. The audit team were advised that while the previous Indigenous Support Worker came to visit ACE on two occasions this was an informal visit and without any services/supports to substantiate the District's claims.
- Three student forms indicated there was service provision on September 15, 22, and 29, 2022 yet it was verified the students were not in attendance on those dates.

- At TREC Alternate there was no evidence of Indigenous support to substantiate the September claim for supplemental funding. Services were not accessible until the newly hired staff member was appointed and at the time of the audit there remained limited information as to what services/supports were currently being provided for individual students. In September the school was offered an opportunity for a few days of help from a District Indigenous Service Worker but the offer was declined by the TREC Principal.
- Three student claims were verified as not enrolled and attending as at September 29, 2022, were also claimed as receiving an Indigenous Education Program and/or Service. It was confirmed that these non-attending students did not receive any supplemental program and/or support services.
- 0.8750 Grade 9 Online (OL) FTEs were claimed in error and should have been claimed as a Grade 10 student. The initial claim was for 1.0000 FTE but only met the active attendance requirement for one Grade 10 to 12 course (0.1250 FTE).
- 5.0000 Kindergarten to Grade 9 OL FTE for a student claim reported in September were not active in the program as required by the OL Active Policy or in accordance with Form 1701 Instructions.
- None of the Kindergarten to Grade 9 OL files had evidence of a required Student Learning Plan (SLP) aligned with the OL Active Policy which says: *To receive funding for students in online learning courses or programs, Boards and Authorities must ensure the following procedures are followed, to demonstrate that the students are actively participating. For full-time Grades K-9 students enrolled in online learning who are not cross-enrolled:*
 - *Learning management system, digital or paper-based evidence onsite of a [student learning plan](#) on record, signed and dated by the BC certified teacher or Letter of Permission holder and parent (and by the student, if old enough to understand the plan), referring to these elements:*
 - *The curriculum learning standards and/or outcomes for the program or course(s) or both*
 - *Required areas of study for the program or course(s) or both*
 - *The BC certified teacher or Letter of Permission holder's plan for providing learning activities*
 - *Learning resources being used to complete the program or course(s) or both*
 - *Assessment strategies and standards of performance expected of the student.*
- There was evidence of assignment completion prior to student enrolment at the OL school. There was no evidence to verify student eligibility prior to the provision of an educational program. In accordance with the Form 1701 reporting instructions, students are to be reported by the education facility with which they are enrolled and attending as at the Data Collection claim date. There must be evidence the student is eligible prior to assigning the student any tasks. To align with Ministry directives regarding student claim eligibility, there is to be evidence of student work after enrolment. While the process of gathering relevant data and entering the information on or before the data collection date may be undertaken, this information must be assembled prior to assigning the student tasks related to the funded education session.
- 0.1250 Grade 10 to 12 school age OL FTEs were not enrolled in the online learning educational program prior to beginning their course were claimed at the September claim date. Fraser

Cascade Online Learning has a current registration process that allows students to start their course work prior to being enrolled.

- Parent/guardian is directed to complete the online pre-registration form to initiate an enrolment process, but the formal enrolment is provided at the intake meeting with the online teacher.
- During the intake meeting the SLP is to be discussed and completed and students are provided with their Moodle login to begin course work.
- The school noted that they try to have enrolment documents completed prior to the students starting their course however the school noted that it is common that the completion of enrolment forms lags behind.
- 0.2500 Grade 10-12 school age FTEs reported by the OL facility did not have evidence to meet the ‘active’ attendance requirement which requires a minimum of five percent of course’s activities to be completed at the claim date in accordance with the OL Active Policy and the Form 1701 Instructions.
- One student who undertook a course in the previous year and withdrew, was found to have re-enrolled in the same course continuing the curriculum where they left off. Students are required to restart the course. In accordance with the OL Funding Policy: “*Assessment of the student’s past work must not be used to evaluate re-claimed course progress*”. Currently the District does not have a withdrawal policy. This is a requirement in accordance with the [Provincial Letter Grades Order](#) which says that assigning a ‘W’ (withdrawal) must be according to the policy of the board as well as upon request of the parent of the student or student when appropriate.
- During the review of the OL student files, it was verified that one claim lacked evidence of BC residency confirmation per the District process. The District currently uses a procedure to ensure students are ordinarily resident in BC called a “Request for Proof of Address”. The schools indicated they followed that procedure, yet evidence indicated that residency was not routinely verified.
- Student records were not always aligned and there were courses and dates that differed on SLPs, course selection sheets and report cards.
- The 0.1250 FTE student claim reported by Fraser Cascade Continuing Education in September was incorrect. The claim was reported as a non-graduated adult with an Autism designation reported for supplemental funding. It was verified that the student graduated in 2015 and was ineligible for the supplemental funding claim in accordance with the Form 1701 Instructions and the Adult Funding Policy nor was the course part of the tuition free options for graduated adults.
- **Student Safety Concern:** It was stated at a meeting with the Principal of TREC that the school was aware of students currently working in “unsafe working environments and unsafe situations”. Although this information falls outside of the scope of the audit process there is a duty to report on the part of all District staff. This information was relayed to the District staff attending the exit meeting so immediate steps could be taken by those present.
- **Special Education Findings:** Four Kindergarten to Grade 9 students and five Grade 10 to 12 students with Special Education designations reported by the facilities were recommended for reclassification. It was verified that for seven claims there were no special education services provided.

- Evidence was provided for the designation process from the school, to the school based team to the District team. The Form “Parent Acknowledgement of Designation” was helpful and confirmed the date of designation.
- All students reviewed had current competency-based IEPs yet in many of the IEPs reviewed the goals did not correspond directly to the needs of individual students as identified by the assessment data and their current level of functioning.
- Many IEPs showed no evidence of measurable objectives or methods of measuring progress.
- No evidence was found of reporting progress on the identified goals and objectives.
- Report Cards showed no evidence of reporting on the IEP.
- Most students designated as Requiring Intensive Behaviour Intervention/Serious Mental Illness (Code H) had norm-reference assessments to identify specific student needs.
 - While there was evidence of inter-agency or service provider involvement in the form of a generic letter, in most cases there was no evidence to indicate intensive and collaborative on-going planning and service coordination (i.e., care team, wrap-a-round meeting minutes or other joint planning).
 - Evidence of special education services for individual students in meeting their unique needs was not clear in most files. Upon request some evidence was presented in the form of learning logs or contacts made via telephone or email. As these services are to be in addition to the student’s annual education plan, evidence of services being provided to individual students is required.
- Evidence of services provided to individual students did not establish the reason for the Alternate Education Program placement over a traditional school placement.
- **Fact Finding for Career Education:** The audit team met with the two District Career Education Coordinators. The program was reviewed along with several student files. As a follow up to the audit outcomes from the 2019/20 Audit Report the following improvements were noted:
The files contained:
 - current ITA registration forms
 - evidence of in-school orientation
 - current training plans including dully signed and dated Work Experience (WEX) Agreements
 - evidence of monitoring and supervision
 - evidence that evaluation was being carried out by an educator with a valid teaching certificate
 There continues to be work for the District in the following areas:
 - development of board policy and guidelines, as per Ministry directives, for both WEX and Youth Work In Trades (WRK)
 - evidence for ITA Youth Apprentice registration numbers
 - expansion of current training plans to include, per course, the unique trade specific skills
 - worksite safety checklist
 - development of employer feedback forms
 - recording of work based training hours which may only begin after the student is registered as an ITA youth apprentice.

In addition to the Career Education recommendation review, it was noted that in the Course Selection Guide 2022-2023 (ACE), the presentation of single course post-secondary transition options do not meet the criteria for claim eligibility but could be offered as a for credit option.

Recommendations

The auditors recommend that:

- The District create a withdrawal policy consistent with the [Provincial Letter Grades Order](#) assigning a 'W' (withdrawal) must be according to the policy of the board as well as upon request of the parent of the student or student when appropriate.
- The District ensure that schools are adhering to, and using, their procedures to ensure students are ordinarily resident in B.C.
- All schools claim only those students who are enrolled and attending as at the Data Collection claim date.
- The District review the Alternate Education Program criteria for the Student Learning Plans of the non-special needs students to ensure the District programs meet the criteria stated in the Alternate Education School Program Policy. On an annual basis to align with the annual school year funding claim, Student Learning Plans must 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. This issue persists since the District's previous audit in 2019/20.
- The District's Alternate Education Program facilities explore options for a reliable attendance tracking system and further ensure all attendance data is accurate. This issue persists since the District's previous audit in 2019/20.
- The District implement an intake and transfer system for students referred to the Alternate Education Program facility to ensure that the needs of the students are being met and that all aspects of the placement are aligned with the Alternate Education Program Policy.
- TREC re-examine the EXCELL program they have developed to ensure that students are not placed in this program based solely on their special needs designation and re-examine the four-day attendance rule to allow all students the opportunity to attend full time and have full access to their supports/services and academic program.
- TREC must follow the District's intake process for new students and cease the requirement for students to be responsible for any part of the intake/transfer process.
- The District ensure that each Alternate Education Program site is adhering to the Alternate Education Program policy directives and providing differentiated instruction where lessons are adapted to meet each student's individual interests, needs, and strengths.
- The Alternate Education Program facilities ensure that all relevant student data and documentation is clear, thorough, and properly dated and/or updated.
- The District immediately investigate the information provided by the TREC Principal to identify and report any students known to be currently working in "unsafe working environments and unsafe situations". As relayed in the exit meeting, the District staff have the legal duty to report a concern about child welfare.
- TREC Alternate Education facility cease the legacy practice of the writing of IEPs, SLPs, or complete organizational tasks in early September resulting in students delaying their start of the

academic year. The school is to be in alignment with District expectations for the number of days all students are in session and the *School Act*.

- TREC Alternate Education facility stop the use of “offsite” permission as there is no teacher oversight, support service provision, check-ins or follow-up for academic work.
- The District is encouraged to explore options within their system to support students who require an alternative placement to a traditional school but do not require the additional supports and services criterion for an Alternate Education Program placement, including online learning for students who are not able to physically attend during a standard school day.
- The District examine the division of work and the oversight of the teacher in the senior program at TREC to ensure that the students are regularly under the supervision of, assessed and evaluated by an employee of the Board of Education who is certified by the Teacher Regulation Branch (TRB) both inside the facility and offsite.
- The District 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 student population in traditional schools. In accordance with the [Alternate Education School Program Policy](#): *Alternate education programs must satisfy certain requirements to be deemed a Type Three Facility. If the programs meet the 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.* This issue persists since the District’s previous audit in 2019/20.
- The District ensure that in circumstances where staff positions cannot be filled by the beginning of the school year, that every effort is made to fill the position temporarily or conversely refrain from reporting any supplemental claims for unsupported services.
- The District ensure that there is a process to confirm annual parental consultation for all Indigenous students before reporting claims as required in the Form 1701 Instructions and the K-12 Funding–Indigenous Education Policy.
- The District ensure that only those students provided with Indigenous Education support programs and/or services in accordance with Ministry directives are reported for supplemental funding. This issue persists since the District’s previous audit in 2019/20.
- The District ensure that a plan for the delivery of Indigenous education programs/services are in evidence at the time of the Fall Data Collection claim date and that only those students provided with Indigenous Education support programs and/or services in accordance with Ministry directives are reported for supplemental funding.
- The Alternate Education Program facilities ensure that when the students are reported as receiving specific supports that they are in attendance and received those supports including any supplemental claims.
- District staff ensure the accuracy of all reported claims before remitting for funding, including student timetables, student attendance and verification of residency in B.C. by their schools.
- Fraser Cascade Open Learning ensure the correct grade placement and courses undertaken and report the student’s annual plan of courses leading to graduation in which the student was enrolled and in attendance as at the September claim date.
- Fraser Cascade Open Learning ensure that all Kindergarten to Grade 9 Online FTEs reported in September are active in the program as required by the OL Active Policy and in accordance with the Form 1701 Instructions.

- Fraser Cascade Open Learning ensure that if claiming online students for Indigenous supplemental funding that there is evidence of the provision of these services in accordance with the Form 1701 Instructions and the K-12 Funding–Indigenous Education Policy.
- Fraser Cascade Open Learning ensure that for all K-9 student claims that there is a teacher-developed student learning plan (SLP) and a documented commitment to the learning plan from the parent that meets the OL Active Policy directives.
- Fraser Cascade Open Learning review the current process for enrolment and adhere to the Form 1701 Instructions and the OL Active Policy to ensure the completion of enrolment before students are given access to a provincially funded educational program, including residency eligibility.
- Fraser Cascade Open Learning ensure that re-enrolment once withdrawn from an OL course is aligned with the OL Funding Policy which says: *For Boards or Authorities to be eligible for funding for the same online learning course taken in the same online learning school by Grade 10-12 students (including adults) the following conditions must be met:*
 - *The student must have been previously reported as failed (through course completion), or as course completed and wanting to improve their mark or withdrawn from that course.*
 - *If a student has withdrawn from a course or did not complete a course, there must be a record that demonstrates a student has not been actively participating for two online learning enrolment counts, with a corresponding record of attempts made by the online learning school to contact the student for that course.*
 - *All [learning standards](#) addressed in the curriculum for a course (contained in the corresponding Program Guide) must be provided to the student when a course is claimed for funding again.*
 - *Assessment of the student's past work must not be used to evaluate re-claimed course progress.*
- The District's Inclusive Education staff ensure IEP goals correspond specifically to student needs and reflect the category of designation.
- The District's Inclusive Education staff ensure IEPs show measurable objectives and methods of reporting on IEP goals.
- The District's Inclusive Education staff ensure there is a clear method of reviewing and reporting on IEP goals.
- The District's Inclusive Education staff ensure special education services are clearly identified for each student in accordance with the Special Education Guidelines.
- The District's Inclusive Education staff ensure there is evidence of inter-agency planning documenting the on-going planning and service coordination for those students designated as Code H.
- The District's Inclusive Education staff connect with the Ministry's Compliance team to obtain a series of documents that may be of assistance in writing effective competency based IEPs and to help guide supportive practices.
- The District arrange a compliance supported professional development session to ensure there is comprehensive knowledge of the requirements for Alternate Education Program aligned with the Alternate Education Program policy and the 1701 reporting instructions.

- The District ensure there is systemic knowledge of the requirements for Indigenous Education supplemental funding claims through a compliance sanctioned workshop.
- A return audit be scheduled to ensure the recommendations in accordance with Ministry directives identified in the 2019/20 school year and the current audit for the 2022/23 school year are put into practice.

Auditors' Comments

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