



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

2023/24 K-12 Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 28 (Quesnel)

2022/23 K-12 ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 28 (Quesnel)

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 2023/24 school year, boards of education reported a total of 574,781.0570 FTEs in Kindergarten through Grade 12. School District No.28 (Quesnel) reported a total of 2,991.1250 FTEs or 3,030 students, including 937 students for Indigenous Education, 76 students for English Language Learning, and 318 students in the low incidence categories for Special 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. 28 (Quesnel) during the week of January 15, 2024. The schools audited were:

- Correlieu Secondary School
- McNaughton Centre-Alternate

The total enrolment reported by these schools on September 29, 2023 was 803.125 FTEs, of which 203 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 2023/24 school year were selected for review. An entry meeting was held on January 15, 2024, with the

Superintendent (also acting designate for the absent Principal of McNaughton Centre), the Principal of the Principal of Correlieu Secondary, the District Principal of Support Service, and the District Principal of Indigenous Education 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.

All staff were accommodating, readily available and worked hard to provide information requested by the auditors in a timely manner.

An exit meeting was held on January 19, 2024, with the Superintendent; the Principal of Correlieu Secondary; the District Principal of Support Services; the District Principal of Indigenous Education; and the Executive Assistant to the Superintendent. At the exit meeting the auditors presented their preliminary results and clarified any outstanding issues.

The audit included the enrolment reported in the 2023/24 school year. The areas audited were:

- September 29, 2023 enrolment and attendance verification
- Ordinarily Resident
- School-Age Grade 10-12 Course Claims
- Alternate Education Programs
- 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:

- The District has a checklist for registering and withdrawing of students, however, it currently does not have a withdrawal policy. As per the Provincial Letter Grades Order assigning a 'W' (withdrawal) is to be undertaken "*according to the policy of the board, and upon request of the parent of the student or, when appropriate, the student, the principal, vice principal or director of instruction in charge of a school may grant permission to a student to withdraw from a course or subject.*"
- The District had a policy that identifies the need and types of documentation required to verify students were ordinarily resident in B.C. The schools indicated they followed that practice yet there was no evidence, when viewing the various schools' documents, that residency had been verified. Student files showed proof of residency of the student, but often did not include residency evidence of parent/guardian. The K-12 Funding General Policy

states “*To be eligible for provincial funding, Boards of Education must ensure that students are: ordinarily resident in BC (and where applicable for school-ages students) with their parent/legal guardian....*”

- At both schools audited, absences on the report cards, the attendance history, and the class attendance lists did not always align.

Correliou Secondary School-Age Grade 10-12 is the single secondary in the school district which enrolls students in Grades 10 to 12. The School offers a variety of programs and courses to students including French Immersion, Business, Careers, Information Technology, Music and Media Arts.

- 2.8750 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](#) (P.15) 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, 2023.*”
- It was verified in a variety of instances students did not attend these courses and there was evidence of funded data adjustments augmenting student scheduling past the September claim date. These courses were dropped from student schedules in October 2023. Given the volume of clarifications required to verify the secondary FTE claims, there was no ability to undertake a systemic review of this practice. Only the FTE inside the sample were reviewed.
- 4.3750 school-age Grade 10 to 12 FTEs were verified as not attending at the claim date. It was verified that a selection of students were not in attendance at the claim date or beyond. Evidence verified a variety of student circumstances including: all courses dropped and were not withdrawn; enrolled with another school; and, were not attending at the claim date yet had courses added prior to submission to the Ministry and were subsequently dropped in October. One non-attending student reported for funding was verified to be working in Alberta.
- 1.7500 school age Grade 10-12 FTEs were claimed for ineligible support blocks. 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.** 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...In support of students taking online learning courses, students cross enrolled in non-OL schools may claim one funded support block per student per school year, **if the other requirements noted above are met.** NOTE: Support blocks are not to be used as the sole method for English Language Learning or Indigenous Education support services.***
 - support blocks were claimed for funding when it was verified that the students’ annual combined program of courses exceeded a total of eight full course claims.
 - support blocks were claimed for funding where it was verified students were not in attendance at the claim date. No evidence was provided to verify that two students, each enrolled in two support blocks, attended either of the support blocks. As well, there was no evidence of instructional service.

- The District reported support blocks labelled as “*Indigenous Support Blocks*”. The District allocated Indigenous targeted funding to provide 1.5 FTE staffing for these support blocks. Through these support blocks, staff provided Indigenous students with support in literacy, numeracy and science. In most cases, the instruction in their support blocks did not align with any other courses in the students’ timetables. Moving forward, while support blocks may be in place to assist students with supports and adaptations specific to Indigenous Education as well as English Language Learning services, per the Form 1701 Instructions these support blocks are not to be used as the sole method of support for these supplemental services.
- **Career Options:** The District offers a variety of Career Education options, including Work Experience (WEX), Train in Trades (TRN) and Youth Work in Trades (WRK). Career program staff, as well as the Principal, worked hard to provide clarifications when requested. Student files were available and student career lists were prepared. District designed documents specifically used for Work Experience (WEX) courses were also provided. Partnership agreements were in place with College of New Caledonia and Skills Training B.C.
- 0.7500 FTEs reported as WEX claims were without evidence aligned with the WEX requirements. Upon review of the WEX files it was verified that there was a variety of missing and/or incomplete items required in accordance with the Ministry of Education and Child Care’s [Elective Work Experience Policy](#), the [Work Experience Legislation](#) and the current [Work Experience Guidelines](#) including:
 - No Board established guidelines. As per the *School Act*, section 168 (2)(a) and Ministerial Order 237/11 (M237/11), “*Before undertaking work study program portion of WEX course:*
 - *Boards must establish guidelines regarding conduct, supervision, evaluation and participation of students in all school-arranged work placements.*”
 - Training plans were not complete and did not contain all the required information.
 - Student, employer, and/or teacher signatures as well as dates were missing.
 - Employability skills and WEX curricular learning standards were not consistently used.
 - Work Experience Placement Agreements were not found in WEX files. The District has a specific document titled Number 2 that does meet the WEX criteria, but was not used.
 - Some clearance letters necessary to ensure WorkSafe coverage were also missing from files.
 - The monitoring process was vague and little evidence of monitoring was available.
 - The District has a form titled *Checklist for Work Experience Placements and Course Reporting* that outlines WEX processes and details required documentation, but it was not used consistently.
 - A course entitled “*Indigenous WEX*” was claimed as a WEX12 option. Aligned with the directives in the *Elective Work Experience Policy: In order to be reported as a Ministry-authorized Work Experience 12A or 12B course, the work experience must be supported and monitored by the school and consist of authentic workplace experiences.* There was no evidence of students participating in an authentic workplace experience, at a standard work site, and were without evidence of:
 - Training plans
 - Work Experience Placement Agreements
 - Clearance Letters

- Safety Orientations
- Being taught WEX 12A Curricular Learning standards
- Monitoring
- The Career staff advised that the course called “*Indigenous WEX*” may provide students credit for WEX if the events attended “fit into WEX.” The teacher indicated sometimes they change the option to a BAA credit. Clarification was requested and the Principal provided a binder of information on each student enrolled in the course with some WEX forms completed. From the information provided, the WEX events were not occurring at standard job sites. This situation required a meeting with the Superintendent who chose to have these funded options reviewed under the lens of a WEX claim and moving forward would be investigating how to create an actual BAA option.
- In accordance with the directives specific to the Ministry Authorized Work Experience 12A and 12B, the Ministerial Order defines “*Work Study Program*” as ***Work Experience at a Standard Work Site***; and “*Work Site Employer*” means an ***Employer that is subject to the Workers’ Compensation Act, including an Employer who is not-for-profit or a community service organization*** “*Standard Work Site*” as a location, ***other than a work site created specifically for work experience by a school or board***, (a) at which a worker performs the tasks and responsibilities related to an occupation or career under the general supervision of an Employer, or (b) at which a self-employed person performs the tasks and responsibilities related to that person’s self-employment. These FTEs reported for funding did not have evidence to align with the required directives.
- 0.1250 FTE was incorrectly claimed for WEX 12A in both the 2022/23 and 2023/24 school years. As identified in the Form 1701 Instructions “*Schools must ensure when tracking hours related to the work study program segment of any WEX 12 and WRK 11A/B, and WRK 12A/B that each of these four credit courses are only claimed once regardless of the number of reporting periods the student requires to complete the work placement component*”. WRK claims did not have separate and unique training plans in place as required in accordance with the [Youth Work in Trades Guidelines](#). Currently WEX forms are being used for WRK documentation.
- For TRN claims, the School does not use a transition plan to collect the information aligned with the criteria and directives outlined in [Recognition of Post-Secondary Transition Programs for Funding Purposes policy](#): *Students begin taking the post-secondary courses that are part of their transition program during their Grade 11 or Grade 12 year.*
 - *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.*

The Career staff are also reminded that per the Post-Secondary Policy that: *as part of the 1701 data collection process which requires course claims to be reported according to the actual course credit value (with a single credit representing the value attached to the knowledge, skill and aptitudes most students can acquire in approximately 30 hours of instruction), not the number of credits defined by the post-secondary institution.*

 - *Assign 4 credits for most single dual-credit transition claims.*
 - *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.*

- At Correlieu Secondary School student schedules generated for the audit were dated October 9, 2023, which required a review of the Student Course Change History (add/drop summary) and Student Learning Updates for first term to determine the number of courses eligible for funding at the September 29, 2023 claim date. The District indicated they were training a new MyEdBC staff member and the process for running audit reports was missed on the snapshot date. This was remedied on October 9, 2023. A [Records Retention notification](#) was relayed to all Superintendents and Secretary Treasurers on August 2023 outlining the Reports Required.
- Correlieu Secondary School offers a four-credit course called English First Peoples 10, which is comprised of two two-credit English 10 courses. This course did not align with the actual course credits. As outlined in the Form 1701 Instructions (P.13) each of these English courses are two credit options and are to be reported as 0.5 (a half course) versus a combined 1.0 (a full credit course) option.

McNaughton Centre - Alternate Education Program

- Students in the Alternate Education Program facility are provided with a safe, comfortable and engaging learning environment, and are generally provided with a number of services to be successful in their school endeavors. Each day starts with the “RAP block” which combines learning strategies, healthy decision making, access to personnel such as the Youth Care Worker, nurse practitioner, and specialized intervention workers. This time is based on the Circle of Courage and offers students the opportunity to work on their social emotional learning, self-advocacy and teambuilding. The School prepares and shares meals throughout the day, which is part of how they work to build community.
- The following issues were identified during the review of the Alternate Education Program claims:
 - The School calendar has been in place for several years. In the 2023/24 school year there are 28 school days where students are not able to attend school. This time is set aside for staff to meet, write Individual Education Plans (IEPs) and Student Learning Plans (SLPs), discuss students, connect with outside agencies, etc. There were indicators that the students were not offered the prescribed hours of instruction to align with the [BC Regulation 314/12](#), which states *“the following are the prescribed minimum hours of instruction that a board must offer to students enrolled in the schools in its school district in the 2019/2020 school year and subsequent school years: (a) 853 hours of instruction for students in kindergarten; (b) 878 hours of instruction for students in grades 1 to 7; (c) 952 hours of instruction for students in grades 8 to 12”*.
 - For the current school year, the students did not start their instruction until September 13, 2023, with a maximum of 11 days of instruction in September where the students engage in work and receive their services prior to the September 29 data collection claim date.
 - The School is closed to students every second Wednesday throughout the year for “Resource Wednesdays”. This time is used for staff meetings, planning meetings, review meetings, problem-solving/planning for student success, etc., and students are not in session. The School is closed again for a week in February for semester change and more meetings.
 - Student Learning Plans (SLPs), and in many cases Individual Education Plans (IEPs), provided general statements about students belonging, graduation, etc., but were vague on details specific as to why the students needed to be placed in an Alternate Education Program (a Type Three facility). Student issues such as attendance, anxiety, drug use, etc.,

were generally not mentioned in the goals and objectives for the students. All Alternate Education Program facilities (defined as Type 3 for funding purposes) must have **an annually** reviewed learning plan for each student. Either an official IEP or a SLP that clearly defines the objectives for the student, additional services provided as required, progress made, and any transition plans.

- There was a consistent issue with the general record keeping of the School and the lack of dates and specific details on forms (i.e. dates detailing supporting staff interventions, identification of outside agency service providers, etc.). It was difficult to find the required information which resulted in numerous clarifications sent to staff.
- Of the 46 student files examined, only a small number of students had any note of transition plans or a planned exit, as required. The only reference being students were going to graduate that year and one student was planning to attend a community college. The requirements for reporting students as receiving an Alternate Education Program includes an exit strategy to facilitate the student's transition back into regular school system, continuing education centre, graduation or to work or to post-secondary training and education.
- The District provides regular opportunities for schools to refer students to receive an Alternate Education Program. A waitlist prioritizing who will be admitted once space is available is maintained. The intake documents provided had very limited information and were often left blank. While the District schools may be of the opinion students are to be placed in the Alternate Education Program facility, the directives outlined in the Alternate Education Program Policy must be followed including a complete and accurate intake process to facilitate district referrals or self-referrals.
- The Alternate Education Program facility provides increased staffing ratios for support staff, Youth Care Workers, counselors, etc., as well as numerous outside agencies, who are to work with students. The evidence of the additional services as required by the student population (i.e., youth workers, drug and alcohol counsellors, etc.) were not accurately recorded nor available at the time of the audit.
- It became clear during the audit that there was a lack of clarity regarding the difference for students wanting or requiring a different option to a traditional brick and mortar school program and adherence to the requirements to provide an Alternate Education Program.
- **5,000** school-age FTEs reported by McNaughton Centre 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 student’s 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 supplemental supports and services required aligned with any special education designation. Specifically:

- Wanting to complete coursework to graduation and preferred smaller classes, shorter duration of classes, more breaks and ability to work at their own pace. Did not like Quesnel Online program. There was no evidence of service required or provided aligned with an Alternate Education Program.
- Referral was due to poor attendance and a grade behind peers with student preferring smaller classes and working at their own pace. There was no evidence of service required or provided aligned with an Alternate Education Program.
- Referral was due to poor attendance, difficulty handing in assignments, and not managing a personal illness well. There was no evidence of service required or provided aligned with an Alternate Education Program.
- Student was cross enrolled with Quesnel Online and wanted smaller class sizes. There was no evidence of service required or provided aligned with an Alternate Education Program.
- The student wanted smaller classes and smaller student-teacher ratio. The student is wanting to work at their own pace. There was no evidence of service required or provided aligned with an Alternate Education Program.
- **6.0000** school-age Grade 10 to 12 FTEs at McNaughton Centre were not in attendance at the claim date nor was there evidence to meet the requirements of the Alternate Education School Program Policy.
- **Indigenous Education Program and Services:** 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 to create a standard of practice throughout the District.
 - District staff, school-based administration, teachers and support staff have established a culture that values Indigenous programs and supports the learning needs of Indigenous students. Specifically, the district:
 - acknowledges the importance of an involved, proactive Indigenous Education Advisory Council.
 - develops Indigenous resources in collaboration with Indigenous communities.
 - fosters positive relationships with local Indigenous communities.
 - offers informative year-long Indigenous professional development for District, school staff, and Indigenous Youth Care Workers and Indigenous Education Support Workers.
 - hosts events such as Indigenous Family Gatherings to share information with parents/guardians, like graduation requirements.
 - There was evidence the program has committed, hardworking staff who know, support and advocate for their Indigenous students.
 - Three students claimed as receiving an Indigenous Education Program and/or Service were verified not to have received any services and/or support in accordance with the

[Form 1701 Data Collection Instructions](#) and the [K-12 Funding-Indigenous Education policy](#).

- For two student claims there was no evidence of supplemental service provision at Correlieu Secondary School. For one of the student claims there was no evidence the student was attending at the claim date. The student did not enroll at the School until November 2023. The student was cross-enrolled yet not on the list of cross-enrolled students from Correlieu Secondary.
- For one student claim at McNaughton Centre there was no evidence the student was attending at the claim date. There was no evidence provided to verify that the student received any Indigenous Support Services.
- While the District does not have an Enhancement Agreement or Local Education Agreement, it does have a functioning Indigenous Advisory Council whose role is defined in *School District No. 28 Procedure No.: 525 Aboriginal Education Council*.
- Evidence for Indigenous Education service to eligible students did not contain an annual record that the parent of the student had been consulted. The District's current practice is to consult with parents once at the elementary level and once at the secondary level to confirm whether they want their child to opt in or opt out of the annual Indigenous cultural or academic support program offerings.
- The District uses a program called AIMS to track student cultural and academic supports and services.
 - At Correlieu Secondary, the program is often used to track the work of the Indigenous Support Worker. Facebook Messenger is used by Indigenous support staff to communicate with parents and students. Student attendance is not tracked when cultural and academic activities/events take place.
 - At McNaughton Centre, AIMS and emails are used to track the academic and social emotional support for students. While there was some evidence that each student received supplemental service, student attendance is not tracked when cultural and academic activities/events take place.
- **Board/Authority Authorized (BAA) Courses:** The District offered credit towards graduation and claimed funding for courses that did not meet the requirements aligned with the [BAA Order M285/04](#) and the [BAA Requirements and Procedures](#). There were no recommendations for recovery, in this instance only, as there was an actual instructional session provided to these students.
 - the following BAA courses had significant overlap to existing Ministry courses:
 - Resiliency 12A and 12B overlaps with Interpersonal and Family Relationships 11, CLC and CLE.
 - Post Secondary Employment Preparation 12 comprises the curricular competencies and learning goals of WEX, CLC and CLE.
- **Special Education:** A total of 57 special education supplemental claims were reviewed.
 - The staff at the schools knew the students well. The many emails in evidence in the files showed good communication with parents and other service providers.
 - In the majority of cases, the IEPs had well documented current levels of ability.
 - Many IEPs had similar goals and there was limited evidence of updated progress reports and transition goals.

- IEPs did not reflect goals related to the reports in the file. Often the goals did not correspond to the category in which the student was claimed. In many instances the goals were similar for the students.
- There was little evidence of coordinated planning across agency and community (integrated case management/wrap around) for students in Code H.
- The Instructional Support Planning Process was used for Code H, but often the information provided did not reflect an intensive need, was not current, or there was insufficient data to support students in Code H.

Correliou Secondary

- One Autism Spectrum Disorder (Code G) student claim was verified as not attending at the claim date nor was there evidence of support services aligned with the category claimed. The Principal said “*the student transferred to Quesnel Distance Learning in October and was not in attendance at time of the 1701.*” Without evidence of service provision by the reporting school, the recommendation is for declassification from any special education classification.
- During the review of the evidence at the secondary school, it was identified that:
 - IEPs contained measurable objectives, updated progress reports and transition goals.
 - there was helpful information in the Confidential Student Profile form and the Contact Notes form.
 - in many instances, there was limited evidence of coordinated planning across agency and community (integrated case management/wrap around) for students in Code H.
 - forms did not always contain complete dates (month, day and year).

MacNaughton Alternate

- Four student claims were without evidence of attendance nor support services aligned with the reported special education classification. Without evidence of service provision, the recommendation was for declassification from any special education category.
 - Two student claims in the Intensive Behaviour Intervention or With Serious Mental Illness Category (Code H) were without attendance evidence at the claim date nor evidence to meet the category criteria.
 - One student claim in the Physical Disability or Chronic Health Impairment Category (Code D) was verified as not attending at the claim date nor was there evidence of support services aligned with the category claimed.
 - One student claim in the Autism Spectrum Disorder Category (Code G) was verified as not attending at the claim date nor was there evidence of support services aligned with the category claimed.

Recommendations

The auditors recommend that:

- The District and school staff ensure there is evidence of all students’ FTEs reported to verify the Fall Data Collection funding claims, and that all courses reported for funding are retained at each claim period as at the required deadline. This information was identified in the August 2023 audit notification to the District’s Superintendent and Secretary Treasurer, in two September 13th presentations to District Level 1 MyEdBC staff, and a further recommendation to retain documentation as noted on P.4 of the Form 1701 Instructions, “*The Ministry strongly advises schools to retain student attendance and participation*”

documentation for each reporting claim to facilitate in the resolution of duplicate enrolment and to assist in the enrolment audit process.”

- Schools claim only those students who are enrolled and attending as at the Data Collection claim dates.
- For Grade 10 to 12 school-age students, schools report only those eligible courses that are scheduled on each student’s timetable as at the Form 1701 claim date, including evidence to verify the eligible Grade 10 to 12 funded courses.
- When reporting funding claims to the Ministry, the District staff are to use the actual course credits aligned with the [Course Registry](#) and per Form 1701 Instructions (i.e., report partial credit courses in accordance with their actual value – for 2 credit options, report as 0.5 of a course).
- Schools are to claim only one course when the student’s learning continues over a single enrolment period. The Form 1701 Instructions say: *Courses encompass only one organized set of learning standards. While completion of the course’s learning outcomes may be over several enrolment periods, only one course is undertaken and therefore eligible for only one funding claim.*
- All schools reporting support blocks ensure that only eligible support blocks are claimed.
- The District staff consider Locally Developed courses be crafted to provide Indigenous support, as the “*Indigenous Support Blocks*” in their current form are not BAA courses nor do they meet the criteria of support block as per Form 1701 (P.16). These options do not meet BAA requirements, given BAAs cannot be preparatory, remedial or modified versions of Ministry courses. Schools wishing to offer preparatory or remedial courses may offer Locally-Developed (non-credit) courses. Please see Chapter 5 of the [Handbook of Procedures for the Graduation Program](#) for more information about Locally Developed Courses.
- The Board of Education must establish guidelines respecting the conduct, supervision, evaluation and participation of students in all school-arranged work placements are in place in accordance with the WEX and WRK directives.
- The District staff ensure that only eligible student FTEs are claimed for WEX and that students are receiving an educational program and instructional component in accordance with all Ministry directives related to WEX including evidence to verify those claims. The course title for *Indigenous WEX* had no evidence aligned with the WEX requirements. The District staff refrain from reporting these options as the Ministry Authorized WEX12 course and investigate offering a BAA or Locally Developed option.
- The District staff ensure that all WEX courses are undertaken at a standard work site and there is evidence the students are covered by WorkSafe BC.
- The District staff be required to consistently use their *Checklist for Work Experience Placements and Course Reporting* that outlines WEX processes and required evidence of detailed documentation.
- Use of all the District career documents be consistent in practice. These documents and processes should be reviewed annually to ensure the data collected meets the criteria and directives of the WEX.
- To ensure WEX directives for student training plans are met, the District staff consider requiring the Career staff to utilize the sample student training plan in the Work Experience Program Guidebook – Appendix A.
- The District’s Career staff review the samples from the WRK Program Guide and incorporate these into practice to ensure all program requirements are met.

- The District’s Career staff review the TRN Program Guide to ensure all documentation to support program delivery is in place and that funding claims align with the [K-12 Funding General Policy](#) and the [Recognition of Post-Secondary Transition Programs for Funding Policy](#) are met.
- 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.
- Aligned with the annual Form 1701 requirements for reporting Indigenous Education supplemental funding, there is to be evidence that the parent or guardian of the student has been consulted.
- The District staff review the consistency of the data recorded on the AIMS program to ensure the Indigenous supplemental services/programs are accurately recorded for each student claimed for supplemental funding.
- The District staff review the criteria for the SLPs of the non-special needs students attending McNaughton Centre to ensure the criteria stated in the Alternate Education Program Policy is met. On an annual basis, to align with the annual school year funding claim, SLPs 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, and enhanced counselling services based on students’ needs including those additional services required (i.e., youth workers, drug and alcohol counsellors and/or specialized support sessions, etc.).
- A clear and thorough intake process to facilitate district referrals or self-referrals are to be established at McNaughton Centre, including completing intake documents used in the process.
- In accordance with the Alternate Education Program policy, 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 District’s standard/traditional school student population.
- McNaughton Centre discontinue the practice of using instructional days as administration days and apply this time to student learning and student services to align with the requirements of the *School Act*.
- McNaughton Centre explore best practices in record keeping and develop a tool to assist in providing clear and explicit information, including details regarding support staff interventions and the identification of outside agency service providers, all of which are to include dates and times as verification.
- The District staff ensure that no BAA courses are offered and claimed for funding until approved in accordance with the Ministry’s directives.
- The District staff undertake a review of all BAA courses offered. If not revised, those BAA courses that do not meet requirements are to be delisted by the Board.
- The District staff ensure all IEPs contain the requirements identified in the Form 1701 Instructions, the [Special Education Services Manual of Policies, Procedures Guidelines](#) and the [IEP Order](#), including:
 - measurable goals reflective of student needs,
 - goals related to the category reported for funding,
 - progress updates,

- transition plans for Grade 12 students
- date of creation.
- The District staff ensure that there is evidence of coordinated planning across agency and community (integrated case management/wrap around) for students in Code H.
- When using the Instructional Support Planning Plan to qualify the student claim for Code H, the District staff ensure the Plan is current, and that there is sufficient evidence of intensive behaviour.
- The District staff create a withdrawal policy per the [Provincial Letter Grades Order: \(Withdrawal\) According to the policy of the board](#), and upon request of the parent of the student or, when appropriate, the student, the principal, vice principal or director of instruction in charge of a school may grant permission to a student to withdraw from a course.
- The District staff are to adhere to their policy ensuring only those school-age students who are ordinarily resident along with their parent/guardian, including evidence of verification aligned with the [School Act](#) Section 82 (a student is resident in British Columbia if the student and the student's guardian are ordinarily resident in British Columbia), the [Eligibility Policy](#) and the [K-12 Funding General Policy](#).
- District schools be required to create a process to accurately reflect student attendance.
- The District be required to undertake a Ministry sanctioned workshop to ensure the Career Program staff are aware of and adhering to the Ministry's Career claim directives including WEX12A/B and TRN11A/B and 12A/B requirements.
- A return audit be scheduled to ensure the findings from this audit are put into practice.

Auditors' Comments

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