



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

**2023/24 K-12 Enrolment Audit**

**AUDIT REPORT**

**SCHOOL DISTRICT No. 33 (Chilliwack)**

## **2023/24 K-12 ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 33 (Chilliwack)**

### **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 1,577.3750 FTEs in Kindergarten through Grade 12. School District No. 33 (Chilliwack) reported a total of 15,332.2500 FTEs or 14,736 students, including 749 students for English Language Learners (ELL) and 2,670 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. 33 (Chilliwack) during the week of February 26, 2024. The schools audited were:

- Chilliwack Secondary School
- Kw'iyeqel Secondary Alternate Facility

The total enrolment reported by these schools on September 29, 2023, was 1,804.8125 FTE, of which 200 student files were reviewed.

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 February 26, 2024 with the Superintendent and each school's Principal as well as District Principal Wicker, the Assistant Director Human Resources, the Indigenous Education District Principal, Assistant Superintendent Jordan, the Student Services District Principal, the Executive Assistant to the Superintendent, Assistant Superintendent Savage, and Assistant Superintendent Manuel 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 March 3, 2024 with each school's Principal as well as District Principal Wicker, the Indigenous Education District Principal, Assistant Superintendent Jordan, the Student Services District Principal, the Executive Assistant to the Superintendent, Assistant Superintendent Savage, the District Vice Principal Student Services, and the Secretary-Treasurer. 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
- Adult Student Claims
- English Language Learning Supplemental Claims
- Indigenous Education Supplemental Claims
- Special Education Supplemental Claims
- 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:

- 1.0000 school-age Grade 10 to 12 FTEs claimed by the secondary school did not meet the criteria for the Train in Trades Program (TRN). The District staff advised the student did not meet the requirements to undertake the TRN option.
- 18.6875 school-age Grade 10-12 FTEs claimed for funding by the secondary school were 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.*"

Many of the secondary school's students were reported as taking a large number of courses (10 to 14 courses). Yet, the Grade 10 to 12 sample of 30 students resulted in 24 student claims being recommended for adjustments as there were more courses claimed than found. At the time of the audit, it was verified that there were challenges for students to complete an educational program consisting of eight courses. At the secondary school, the students do not attend their courses in a regular timetable, as the teachers attempt to capture time where students are interested in learning in order to work on different courses for literacy, numeracy, social studies, sciences, etc.

- 5.6250 school-age Grade 10 to 12 FTEs claimed for funding by the secondary school were without evidence of attending at the September claim date.
- 2.5625 non-graduated adult FTEs claimed for funding by the secondary school were without evidence to meet the [Adult Funding Policy](#) directives. The directives specific to reporting non-graduated adults for funding can be found on P.2 of the Form 1701 Instructions (P.2): ... *are taking Ministry-Authorized or Board/Authority Authorized courses that lead to a graduation diploma. Eligible courses (detailed in the Adult Funding Policy) will be funded if they are documented on a Course Enrolment Form and the student meets the attendance definition written in the Adult Funding Policy and the student meets the funding eligibility requirements set out in the K-12 Funding Policy.*
- 0.50000 non-graduated adult FTEs claimed for funding by the secondary school were attending fewer courses than reported at the September claim date.
- 0.5000 school-age Grade 10 to 12 FTEs were claimed by the secondary school for a duplicate course in the same funded year. The Form 1701 Instructions says: *“Students are not allowed to take the same course at the same time during the funded school year whether in different schools or the same school.*
- Four students verified as not attending at the September claim date were also reported by the secondary school as receiving a supplemental Indigenous Education program and/or service. It was verified that these non-attending students were without any supplemental program and/or support services.
- 4.0000 school-age non-graduated FTEs reported as receiving an Alternate Education Program were verified as not in attendance nor was there evidence to meet the requirements of the [Alternate Education School 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 back into regular school system, continuing education centre, graduation, or to work or post-secondary training and education;* and 4) *Evidence of additional services as required by the student population (i.e. youth workers, drug and alcohol counsellors and/or sessions, etc.).* 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.*** At Kw’iyeqel Secondary*

Alternate Education Program School attendance was difficult to verify as there were discrepancies between attendance data on report cards and the MyEdBC documentation as well as a lack of attendance data available within a selection of student files.

- The District offered credit towards graduation and claimed funding for several courses which had not been approved as a Board/Authority Authorized (BAA) course nor were they in alignment with the Board Authorized requirements. The [Board Authorized Course Order M285/04](#) says: *“A board may not offer a Board Authorized Course to students as meeting the Minister’s requirements for graduation until the superintendent for the school district and the board have approved the Board Authorized Course in the manner and form required by the Minister. No Board Authorized Course shall be offered for use in a school as meeting the Minister’s requirements for graduation until the board (a) on receipt of a request of the superintendent for that school district, approves the Board Authorized Course, (b) has submitted the required information in the manner and form required by the Minister”*...and from the [BAA Requirements and Procedures Guidelines](#): *“Schools must have the approval of their Board of Education or Independent School Authority prior to offering a BAA course, regardless of whether the course has already been authorized by another Board or Authority.”* There was no evidence at the time of the audit that the BAA Guidelines or related Ministerial Order requirements were met. There were no recommendations for recovery in this instance only as there was evidence of an instructional session provided to the students.
  - The District’s options identified as BAA courses had a number of issues requiring updates, delisting, or modification. Many of these options were similar to, or overlapped with, current Ministry courses while other options identified as BAAs were remedial in nature.
  - The School Board currently offers 18 options identified as BAA courses that were without evidence of review and/or revision at the 2018/2019 school year. Graduation requirements were revised in the 2018/2019 school year wherein boards were required to review their BAA offerings to meet 2018 graduation program requirements and new curriculum design. There was no evidence at the time of the audit that the BAA Guidelines or related Ministerial Order requirements were met.
  - As identified in the BAA Guidelines when referencing BAA options, it states that: *The courses may overlap with Big Ideas and Curricular Competencies of ministry courses; however, these courses cannot be:*
    - ***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 enroll 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 adaptations.*

- Flex Program – Flex BAA was identified as a 40-minute block run every Tuesday and Thursday and does not meet the requirements of a BAA course. All students are assigned to this mandatory two-credit course. It was intended that teachers would create course offerings which they upload as a choice. Students were encouraged to make a choice each week on what they want to work on using the “MYFLEXAPP”. The students were to log in to this app to choose their sessions weekly. A one day snapshot (September 26, 2023) of student attendance in Flex verified that out of the population of approximately 1,500 students, 953 students attended Flex, 69 students used the app to sign up but were absent, and the remaining 492 students did not attend Flex.
  - This option aligns with a support block for many students as the teacher indicates students are to sign up for work completion/extra support/review/study, homework support, etc. For motivated students, the option provides enhancement.

### **Chilliwack Secondary School:**

- The District is commended for their continuous support and contact provided to the students. The staff were knowledgeable about their students, demonstrating genuine concern for the students’ well-being and providing them with a high level of support and care.
- There was evidence of an inclusive, supportive environment.
- A number of instances were found where report cards did not reflect current student progress information.
- Aligned with the requirements for reporting a student as receiving an Indigenous Education program or service, there was limited evidence that the parent or guardian of the student had been consulted regarding the plan for the delivery of Indigenous Education Programs and or services for the current school year.
- At the time of the audit, Indigenous student attendance was a concern for the school staff. In some cases, the students were at school but refused to attend classes; instead chose to stay in the Indigenous support area. There was little, to no evidence of support for these students, either academic or cultural.
- Two students reported as receiving Indigenous Education and Special Education supports and services were verified to have received academic support for their Special Education designation but were without services/supports for the Indigenous Education supplemental claim.
- The District has a new Indigenous tracking tool (EdPlan-Insight) established to collect support servicing in a more efficient manner for the assigned staff. The staff indicated the new program has limitations and does not track what was considered to be support the Indigenous students were receiving. As the auditors were unable to find EdPlan-Insight evidence of support services, service verification was undertaken by meeting with the staff. Through their notes/records there was information to verify supplemental services.
- The staff working in the Indigenous Department indicated challenges as two of the four staff members are on leave and the Graduation Coach is new to the position. Instead, the staff work closely with the Indigenous students with the highest needs or those who seek out their support.

### **Kw'iyeqel Secondary Alternate School:**

- There was evidence that students were engaged and the environment was welcoming, and vibrant. The students were respectful and caring to each other, staff and guests.
- Staff at this Alternate Education Program School were very responsive in providing information for auditor's requests and were curious about the audit process and the program's policy requirements.
- The District staff are commended for the continuous support and connections provided to their vulnerable students. Staff demonstrated genuine concern for students' well-being and provided a high level of support and care.
- There was evidence of well prepared consultation logs, often several pages long, reflecting the staff's ongoing engagement with student to keep them in school.
- There were instances where the IEPs lacked specific evidence with regard to staff responsibility and support to be provided.
- Upon review of the SLPs, there was limited information that was unique to each student. The information tended to be generic and did not provide specific strategies or supports for student success.
- In many instances, it was unclear as to the reasons for a student to be attending the Alternate Education Program. The intake process did not always reflect the criteria required to attend a facility of this type.
- The number of outside agencies involved at this School to help support the student population was extensive. The Alternate Education Program School is staffed with a broad range of support for the students including; Indigenous Support Workers, Learning Assistance Teachers, Child and Youth Care Workers, School Counseling, an Indigenous Graduation Coach, a Work Experience and Career Advisor, as well as a Giant Buddies Mentorship Program with a local elementary school. The School has partnerships with a number of outside agencies including supports from Indigenous Youth Mental Health, the Pacific Community Resource Society, the Ministry of Children and Family Development, Chilliwack Community Services, Therapy Dog Program, and the Memiyelhtel-Indigenous Youth Mentorship Program, Start Team, Yo Girl/Yo Boy, etc.
- The School runs theme-based multilevel homerooms where the students attend each morning to work on their core academic courses. Each of these homerooms also have a full-time educational assistant, to help students with their class work and work with the teacher to differentiate instruction based on the student's specific needs.
- The School also runs sustainable resources, outdoor education, expressive arts program, and a culinary arts program. Each program is supported by a teacher and an education assistant. Additionally, there is a trade-based program at one of the Alternate Education Program sites. The program is supported by two trades teachers and two education assistants.
- Some students are involved with the University of the Fraser Valley where students spend a term on site to work on their trade. While there, students are supported by the Alternate Education Program staff; with a full-time EA, weekly check-ins on site with two Indigenous Support Workers, an Indigenous Graduation Coach, as well as two Youth Care Workers who do social emotional check-ins.
- The School staff reported that every student now has an IEP in MyEdBC because there was a recognized weakness in the current SLPs.

- In reviewing proof of ordinary residency, it was noted that some files contained evidence from the student's previous school districts. The SD33 staff did not update proof of residency at the time of enrolment.
- In the morning the Indigenous education assistants walk through classrooms and check in with the Indigenous students for the first block. Once the Indigenous education assistants finish checking in with their students, they provide daily academic support.
- Several times a month there are Indigenous Cultural events or activities offered to the students including: visits with a Stó:lō Elder, a drumming healing circle on Monday mornings and craft activities such as learning how to bead. There are also regular cultural field trips. The staff's tracking and reporting on programming were not reflected in the reports provided.
- The Graduation Coach's role is to support students in Grades 9 and 12 to ensure Indigenous students are well prepared to transition from class to class, grade to grade or to post-secondary and/or work. The priority is to make sure students are well prepared for all transitions. The Graduation Coach liaises between the student, home, classroom teachers and the post-secondary options. They connect students to mental health resources when required.
- The Indigenous staff ensure that Indigenous students' traditional roles such as the ones that take place in the Longhouse are honored, respected and valued. Two Alternate Education Program teachers were invited to a District-wide Longhouse event and were blanketed by their students.

#### **Hockey Academy:**

- The School Board has one Speciality Academy for Hockey. The evidence provided by the District staff identified two fees. One document stated the fee was \$1,800.00 and the one most recently published document stated \$1,500.00. Regardless of the overall cost of the Academy, the District staff consistently charge a \$200.00 non-refundable administrative fee that is required when the student is enrolled.
- It was verified that a number of practices are not aligned with the *School Act*, related Regulations and funding eligibility directives for this speciality academy.

**From Section 82.1 of the *School Act*** is the following: "*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.*

- With reference to Section 82.4 Financial Hardship is the following: **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
- Definition of “goods and services” from the segment of [School Regulation 265/89](#) "goods and services" includes, but is not limited to, (a) materials and equipment of a nature, or of a quality or quantity, **beyond that which is necessary to meet the required learning outcomes or assessment requirements of an educational program provided by a board**, (b) paper, writing tools, calculators other than graphical calculators, student planners, exercise books, computer storage media and other school supplies and equipment for a student's personal use, (c) **REPEALED** am BC Reg. 264/07, effective July 19, 2007 (d) **the payment of expenses, including expenses for transportation, accommodation, meals, entrance fees and equipment rentals, in respect of optional field trips or special events that are not necessary to meet the required learning outcomes or assessment requirements of an educational program provided by a board.**
- Specific to the charging of fees aligned with educational options for BC resident school age students reported to the Ministry for FTE funding, is the following segment from the [Eligibility of Students for Operating Grant Funding Policy](#) which says: “Students who are ordinarily resident or deemed resident in British Columbia are entitled to provincial funding under section 82 of the School Act; **boards may not charge fees for these students except in accordance with Section 82 of the School Act**”. Section 82 of the School Act says: **82 (1)A** board must provide free of charge to every student of school age resident in British Columbia and enrolled in an educational program in a school operated by the board, (a) instruction in an educational program sufficient to meet the general requirements for graduation, (b) instruction in an educational program after the student has met the general requirements for graduation, and (c) educational resource materials necessary to participate in the educational program.

#### **Advanced Placement:**

- Chilliwack Secondary School is currently offering three Advanced Placement (AP) courses. AP Chemistry is currently provided outside the timetable and students do the AP assignments/homework with the teacher. AP English Literature and Composition 12 is advertised as an eight-credit option for one course and is combined with English Studies 12. It was verified that there are activities outside of class time such as written assignments, tests, presentations and projects which provided minimal evidence to form a basis of their AP course claim. Calculus 12 is provided as an eight credit option inside the timetable.
- In this instance only there are no recommended adjustments for AP being offered as eight credit options as there was evidence of separate and distinct educational options. Moving forward, the School must ensure that when reporting educational options as AP that the Form 1701 Instructions are adhered to: *Schools may claim an AP course as a separate course...only if it meets the definition of a course, is a separate and distinct instructional session of approximately 120 hours (for a four- credit course) on the student's timetable,*

*the course is being taught by a certified teacher and is in accordance with the Student Credentials Ministerial Order M164/96.*

**Career Programs Overview:**

- The School District offers students a wide variety of Career options including Work Experience (WEX), Youth Trade Samplers, Train in Trades (TRN) and Work in Trades (WRK). Support is provided with a District Career Program Coordinator in addition to a District Principal and the Vice-Principal at Chilliwack Secondary who coordinate opportunities for students. The evidence provided was well organized.
- Several student files reviewed contained evidence of a “Contact and Continuous Support Log” that reflected the amount of contact staff made to parents/guardians regarding non-attenders.
- Several students were enrolled in the second semester for TRN options at University of the Fraser Valley and were also enrolled in a full second semester course load at the high school (four or more courses). It was verified that for the second semester, the students would be leaving the high school to attend the post-secondary institution and that all four courses reported for the second semester were place holders. In other instances, students were claimed for TRN options, yet never attended the post-secondary institution as they were deemed not to have met requirements.

**Special Education Supplemental Funding Claims:**

For both schools, a combined sample of two student files reported in the Physically Dependent category (Code A), four student files in Moderate to Profound Intellectual Disabilities (Code C), 20 student files in Physical Disability or Chronic Health Impairment (Code D), two student files in Visual Impairment (Code E), three student files in Deaf or Hard of Hearing (Code F), seven student files in Autism Spectrum Disorder (Code G), and 32 student files in Intensive Behavior Interventions/Serious Mental Illness (Code H) special needs categories were reviewed and evaluated to determine if the students in these categories were accurately reported on Form 1701.

There were no recommended adjustments for the student files reviewed by the auditors in Codes A, Code E, or Code F.

Of the four student files reviewed by the auditors in Code C:

- One student claim was recommended for declassification from any special education supplemental claim.

Of the 20 student files reviewed by the auditors in Code D:

- Two student claims were recommended for declassification from any special education supplemental claim.

Of the seven student files reviewed by the auditors in Code G:

- Two student claims were recommended for declassification from any special education supplemental claim.

Of the 32 student files reviewed by the auditors in Code H:

- Three student claims were recommended for declassification from any special education supplemental claim.

- For one school-age student claim in Code C reported by the secondary school, there was no evidence the student was attending at the claim. The school-based team referral form stated, *“the student has not attended this year and did not attend in middle school.”* As it was verified that the student was not attending and was without evidence of service provision, the recommendation was declassification from any special education category.
- For one school-age student claim in Code D reported by the secondary school, there was no evidence that the chronic health impairment was significantly impacting their functioning and education. The student had been diagnosed with a seizure disorder as an infant, but the IEP quoted his doctor saying, *“he has outgrown it.”* It was verified that the student was not receiving special education services to address the needs identified in the assessment documentation that were beyond those offered to the general school population and proportionate to level of need. As there was evidence the student was an independent learner with the report card identifying achievement over 85% in all of their courses, the recommendation was for declassification from any special education category.
- For one school-age student claim in Code G reported by the secondary school, it was verified that the student was not attending nor was there evidence of any support services associated with the claim. The student’s mother was quoted in the contact log as stating, *“...due to his behaviour and schedule, school was not the best option for him at this time.”* As there was no evidence of attendance nor of service provision, the recommendation was for declassification from any special education category.
- For one school-age student claim in Code H reported by the secondary school, there was no evidence to support the student has been appropriately assessed and identified by the School District to meet the criteria for an Intensive Behaviour Intervention or Serious Mental Illness Category classification. There was no evidence of planning coordinated across agency and community (integrated case management/ wraparound) nor was the student receiving any support services from the School. There was evidence in the file of a conversation with the parent where they requested the student be removed from the category: *“there is no longer coordination with the outside counsellor supporting the student. The student has transitioned well to high school and is achieving well in his classes.”* As it was verified that the claim did not meet criteria nor was there evidence of service provision by the School, the recommendation was for declassification from any special education category.
- For one school-age student reported by the secondary school in Code H, there was no evidence the student was attending as of the claim date nor of service provision. The recommendation was for declassification from any special education category.
- For one school-age student reported by the Alternate Education Program school in Code H, there was no evidence the student was attending as of the claim date nor of service provision. The recommendation was for declassification from any special education category.
- The reviews of the students reported as non-graduated adults verified that the following claims did not meet the required eligibility for a special needs funding claim. The Form 1701 Instructions for reporting non-graduated adult students says: *Students born prior to July 1, 2004 are considered adult students. o Adult students who are taking Ministry-Authorized or Board/Authority Authorized courses that lead to a graduation diploma. Eligible courses (detailed in the Adult Funding Policy) will be funded if they are documented on a Course Enrolment Form and the student meets the attendance definition written in the Adult Funding Policy and the student meets the funding eligibility requirements set out in the K-12 Funding Policy;*

*o Non-graduated Adult students with Special Needs - For the 2023/2024 school year, students are non graduates over the age of 19 who: 1) have special needs; 2) were reported in 2022/2023 3) are taking an educational program in accordance with the Adult Funding Policy, 4) are continuing their K-12 education program uninterrupted from when they were still school age, and 5) are working towards the continuation of those school-age goals set out in their Individual Education Plan (IEP), may be reported on Form 1701.*

- While graduated adults are only funding eligible for the [Tuition Free Options](#), all non-graduated adults are only funding eligible for courses leading to the BC Certificate of Graduation (the Dogwood) or the Adult Graduation Diploma (the Adult Dogwood). The eligible courses are limited to Ministry of Education and Board/Authority Authorized courses as these are the specific courses that lead to a graduation diploma. The [School Completion Certificate](#) (also known as the Evergreen) is not a graduation credential.
- Specific to funding eligibility of special education supplemental services/supports for non-graduated adults, in addition to the non-graduated adults being enrolled in eligible courses (Ministry Authorized and BAA options) leading to the BC Certificate of Graduation or the Adult Graduation Diploma, these students must have been reported with special needs in the previous school year; continuing their K-12 education program uninterrupted from when they were still school age; are taking an educational program in accordance with the [Adult Funding Policy](#); and are working towards the continuation of those school-age goals set out in their IEP (Ref. Form 1701 and the Adult Funding Policy).
- For one non-graduated adult student claim in Code D reported by the secondary school, there was no evidence that they were working towards the completion of a BC Graduation Program. The student has a moderate intellectual disability and there was a note in the file stating, *“Last year was grade 13 – when she turned 19, she signed her own consent to modify form so she could work towards an Evergreen certificate and walk across the stage. They brought her back for 1<sup>st</sup> semester this year to connect her to CLBC funding and support and STADD employment support.”* As there was no evidence aligned with the eligibility for a non-graduated adult claim nor alignment with the supplemental servicing for non-graduated adults, the recommendation was for declassification from any special education category.
- For one non-graduated adult student in Code G reported by the secondary school, there was no evidence of a diagnosis of Autism while they were school age. The student was diagnosed with ASD as an adult. The student was not reported as having special needs in the 2022/2023 school year, nor was there evidence of a school-age IEP. As there was no evidence aligned with the eligibility for a non-graduated adult claim nor alignment with the supplemental servicing for non-graduated adults, the recommendation was for declassification from any special education category.
- Upon review of the Special Education supplemental claims at Chilliwack Secondary School:
  - The classroom education assistant schedules, the school-based team notes, and the agency contact logs were helpful in verifying support for the claimed students.
  - In some instances, forms did not have complete dates and the Contact and Continuous Support logs did not have names or titles of the individual(s) recording the information.
- Upon review of the Special Education supplemental claims at Kw’iyeqel Secondary Alternate Education Program School:
  - The Coordinated Planning Log showed evidence students were connected to appropriate outside agencies and parents had been consulted.

- The Level Two and Three Supports Chart was helpful in determining that students claimed in Code D and Code G are receiving services that were in addition to those provided to other students in the Alternate Education Program.
- At both Chilliwack Secondary and Kw'iyeqel Secondary Alternate Program the reviews found that:
  - In some instances:
    - The goals on the IEPs did not correspond to the category in which the student was claimed.
    - There was only one goal on the IEP.
    - IEPs did not have methods for measuring progress in relation to the goals.
    - There was no evidence the parent had been offered the opportunity to be consulted about preparation of the IEP.
    - Many of the IEPs had the same date of creation (September 5, 2023) and many had the same goals.
    - There was no evidence of transition goals on the IEP.
  - The Instructional Support Planning process was the only evidence used for placement in Code H. There was a lack of assessments by medical professionals and few norm-referenced assessments.
  - In many cases the Support Planning process was not complete or outdated by at least two years. There was a stated review date on the document, but no evidence of a review or update.

### **Recommendations:**

The auditors recommend that:

- Schools claim only those students who are attending as at the Data Collection claim date.
- The District staff ensure all students claimed for funding are enrolled and attending at the Data Collection claim date.
- For all students, schools are to retain evidence to verify that the FTEs claimed are eligible for funding, including evidence to verify the Grade 10 to 12 funded courses.
- The District staff implement procedures to verify students are not reported for duplicate course claims.
- Schools endeavor to evaluate their attendance record keeping procedures, for consistency amongst reporting documents and reflects actual data.
- The District staff ensure that student report cards have current and up to date information on each student's progress.
- The District staff ensure that students claimed for supplemental services have separate and distinct evidence associated with these claims and that each supplemental claim meets the additional criteria for English Language Learning, Indigenous Education and Special Education.
- The District staff consider implementing training for the consistent use of the EdPlan-Insight program being used to track Indigenous student support.
- The District staff ensure consistency in all schools regarding the annual verification of students claimed for Indigenous Education supplemental programs/services in accordance with the Form 1701 directives, including:
  - Evidence the parent/guardian has been consulted.

- Evidence that the programs 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 have involved the Indigenous communities in planning and delivery.
- The District staff cease the ineligible practice of charging fees not aligned with the *School Act* and provide refunds to any BC resident students in a District academy.
- The Board ensure that they are in alignment with all requirements for Section 82.1 of the *School Act*, the “goods and services” segment of School Regulation 265/89, and the Specialty Academy Criteria Regulation 219/08.
- The Board ensure that the Parent Advisory Council for each school offering a specialty academy has been consulted and has approved the fees before establishing and posting the annual schedule of fees.
- The District staff review the BAA Guidelines to verify the categorization of the Flex option to ensure it is not reflective of a support block, does actually meet the standards of a course and/or is reflective of a two-credit option.
- The District staff is encouraged to review their automated enrollment process for the mandated Flex option to ensure each student is provided with course options toward their personal graduation goals.
- The District staff revisit their procedures and processes currently in place when developing BAA options ensuring that all BAA courses are in alignment with the Board Authorized Course Order M285/04 and the BAA Guidelines.
- The District staff undertake a process to review all BAA courses currently offered that were not revised and approved in 2018/2019. Courses not meeting the new curriculum guidelines and align with the Ministry’s Know-Do-Understand curriculum design model are to be rewritten, recategorized as non-credit options, or delisted.
- Following approval, the Board are to submit the signed BAA Course Form to the Ministry of Education and Child Care in accordance with Ministry policy and the Board/Authority Authorized (BAA) and First Nation Authorized (FNA) Course Requirements and Procedures Guidebook.
- The District staff review their current delivery model for Advanced Placement courses to ensure that each is a separate and distinct course in alignment with the Form 1701 Instructions.
- The District staff review the Alternate Education Program Policy’s criteria for the Student Learning Plans including: on an annual basis to align with the annual school year funding claim, Student Learning Plans are to 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 District staff ensure that when completing English Language Learning progress reports, educators consider reporting on a student’s actual progress between terms.
- As several of the career files containing pertinent notes regarding individual student situations were anonymous and without dates, the District staff ensure that all notes and correspondence in files pertaining to student circumstances be fully dated and identify the identity of the writer.
- The Alternate Education Program staff ensure the educators clearly articulate the reason that the student is being enrolled in an Alternate Education Program and to ensure all relevant paperwork/documentation is appropriately completed and well defined.

- The Alternate Education Program staff ensure that the IEPs/SLPs clearly identify the services provided to students when at school as well as when undertaking various off-site career options.
- The District staff ensure that student report cards contain current information on student progress.

**Special Education Recommendations:**

- The District staff ensure all IEPs have:
  - measurable goals and objectives that correspond to the category in which the student is identified and address the needs in the documentation for the student.
  - the parent is offered the opportunity to be consulted about preparation of the IEP.
  - transition goals for students entering or leaving secondary school.
  - goals that include core competencies and academic goals and strategies.
- The District staff ensure that when using the Instructional Support Planning Process the document is completed in its entirety, reflects the current ability of the student, and the information is used to develop the IEP goals and strategies.
- The District staff ensure all contact logs and forms identify the name and position of the person filling out the form as well as the complete date.
- The District staff ensure that Form 1701 reporting is verified prior to submission and that student files are updated and reviewed regularly to ensure the students meet the criteria in the category in which they are claimed for the reported school year.
- The District staff ensure student claims in Code D meet the criteria listed in the Special Education Manual of Policies Procedures and Guidelines for that category. There must be documentation of a medical diagnosis in one or more of the following areas: nervous system impairment that impacts movement or mobility, musculoskeletal condition, or chronic health impairment that seriously impacts the student's education and achievement.
- The District staff ensure that all non-graduated Adult students claimed for funding including any special education supplemental funding meet the Adult Funding Policy criteria as well as the Form 1701 directives.
- The District ensure student claims in Code H have evidence to support that the student has been appropriately assessed and identified. There must be evidence that planning is coordinated across agency and community as specified in the Special Education Manual of Policies, Procedures and Guidelines. There must be an IEP in place dated after September 29<sup>th</sup> of the previous school year and the students must be receiving additional service.

**Auditors' Comments**

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

**Funding and Financial Accountability Branch  
Resource Management Division  
Ministry of Education and Child Care  
March 11, 2024**

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