



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

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

**AUDIT REPORT**

**SCHOOL DISTRICT No. 44 (North Vancouver)**

## **2022/23 K-12 ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 44 (North Vancouver)**

### **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. 44 (North Vancouver) reported a total of 16,425 FTEs or 16,163 students, including 1,592 students for English Language Learners (ELL) and 632 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 44 (North Vancouver) during the week of February 5, 2024. The schools audited were:

- Handsworth Secondary
- Mountainside Secondary-Alternate

The total enrolment reported by these schools on September 29, 2023 was 1577.3750 FTEs, of which 178 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 5, 2024 with the Superintendent and each school's Principal also at the meeting were: Assistant Superintendent

Atkinson, Assistant Superintendent Martin, the Vice Principal of Handsworth Secondary, the Vice Principal of Mountainside Secondary, Director of Instruction Churu, Director of Instruction Boumann, the District Career Coordinator, the Inclusive Education District Principal, the English Language Learning District Facilitator, the Curriculum District Principal, the Curriculum and Assessment District Principal, the Records Manager, the Indigenous Education District Principal, the Director of Information and Communication, and the Administrative Services District Principal 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 the student files electronically (as requested by the District staff – not paper based), 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 electronic document versions presented by the schools.

An exit meeting was held on February 9, 2024 with the Superintendent and each school's Principal. Also at the meeting were: Assistant Superintendent Atkinson, Assistant Superintendent Martin, the Vice Principal of Handsworth Secondary, the Vice Principal of Mountainside Secondary, Director of Instruction Boumann, Director of Instruction Churu, the District Career Coordinator, the Inclusive Education District Principal, the English Language District Facilitator, the Curriculum District Principal, the Curriculum and Assessment District Principal, the Records Manager, the Indigenous District Principal, the Information and Communication Director, and the Administrative Services District Principal. At the exit meeting the auditors presented their preliminary results.

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
- English Language Learning Supplemental Claims
- Indigenous 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:

- **0.2500** school-aged Grade 10 to 12 FTEs were duplicated course claims. It was verified that the students were enrolled in the same course at the secondary school, as well as the District's Online school. As stated in the Form 1701 Instructions: "*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.

- **0.6250** school-aged Grade 10 to 12 FTEs did not meet the eligibility directives in the Work Experience (WEX) Program Guidelines. It was verified that the workplace responsibilities were identical for both WEX 12A and WEX 12B course claims. There was no evidence these course claims were two separate and distinct WEX options. The WEX12B responsibilities did not identify different responsibilities from those in WEX12A. The [Work Experience Guidelines](#) say that: : “Educators must ensure that student training plans outline the goals for learning and skill development for each WEX placement and demonstrate a student’s progress through the curricular learning standards and job-specific skills for each of the WEX courses the student undertakes...A WEX 12B training plan must describe new, different responsibilities from those in WEX 12A”...and is to include” information such as the hours to be worked, duties or tasks to be performed, employability skills to be practised, and workplace specific skills to be developed”.
- One English Language Learning student claim was without evidence to demonstrate requirements related to the provision of services as required in accordance with the Form 1701 Instructions which says: *For secondary students there must be some evidence of support services in September although it may be appropriate to increase the level of service in the second semester based on scheduling of the student’s courses or course load. Service that is deferred entirely to a later time (i.e., there is no support or planning in evidence at September 29) will not be funded.* There was no evidence of continuous service or support provided throughout the year in addition to the student’s standard educational program.
- **5.000** school-age FTEs reported by Mountainside Secondary Alternate 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 (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.*** 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.*

- Two students were attending post-secondary career options. These students had no evidence of an Alternate Education Program.
- Two students were seeking a placement different from a traditional secondary school. There was no evidence of service required or provided aligned with an Alternate Education Program.
- A student was cross enrolled at Handsworth Secondary. It was verified that there was no evidence of service required or provided aligned with an Alternate Education Program.
- **5.0000** school-age Grade 10 to 12 FTEs at Mountainside Secondary were not in attendance at the claim date nor was there evidence to meet the requirements of the Alternate Education Program Policy.
- 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 no ability to undertake a complete review given the District staff did not provide the requested clarifications well past the conclusion of the audit.
  - The School Board is currently offering 20 BAA courses that were not reviewed and/or revised in the 2018/2019 school year. Graduation requirements were revised for students graduating in the 2018/2019 school year or later. School districts were required to review their BAA offerings to meet 2018 graduation program requirements and new curriculum design requirements. The District stated: “Some of the BAA Ministry of Education submissions were signed and submitted before implementing the new curriculum in 2018; as part of the implementation of the new curriculum, the course descriptions for these BAA courses were revised to include the new language of the new curriculum. Revised BAA Ministry Education submission forms reflecting the changes in the course description language have not been located... We recognize there are incidences where a course description does not have a corresponding Ministry of Education submission form and vice versa.” There was no evidence at the time of the audit that the BAA Guidelines or related Ministerial Order requirements were met.
  - 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 FNA Course Requirements and Procedures Guidebook](#): “*Approval Process for Board/Authority Authorized Courses – Schools must have the approval of their Superintendent and Board...prior to offering a BAA course*”.
  - The Teacher Assistant 12 course did not meet the requirements of a BAA course. The BAA was incomplete, some sections were left blank and was not representative of a four credit course as there were insufficient curricular competencies, content or elaborations.
  - Applications for Learning 10, 11 and 12 were developed to provide support to learning challenged students to “learn instructional strategies and organizational skills to support their overall academic success” and to provide “assistance with academic work from the

regular classroom and remedial support in many aspects of academics”. From the evidence at the time of the audit, this option is more representative of a Locally Developed non-credit course not a for-credit BAA option.

- As BAA courses cannot overlap a Ministry course or be remedial in nature, these options are likely representative of non-credit options as identified in the BAA Guidelines when referencing BAA options clarifies 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.*
- **ALTERNATE EDUCATION PROGRAM:** Mountainside Secondary Alternate School is a Type Three Facility (the Facility) led by passionate and caring education and support staff. It was apparent that the faculty and staff know their students well and work to provide a positive learning environment.
  - Student placements for an Alternate Education Program come through the District Resource Team (DRT). Their referral process is based on the expectation that the Schools of Record, District and School Learning Services have exhausted their resources before they refer any student to the Facility.
  - Services available at the Facility and/or in partnership with the community include: Psychologist, Probation, Restorative Justice, B.C. Children's Hospital, Youth Outreach, Ministry of Children and Family Development, Child and Youth Mental Health Clinics, the RCMP, etc.
  - This Facility is located in the same facility as the Online Learning School. While students reported as receiving an Alternate Education Program are eligible to be cross enrolled with online schools, they must still be provided with the programming specific to the Alternate Education Program Policy requirements. It was unclear why students who were able to be successful in the online environment with a large course load were also enrolled in the Alternate Education facility taking a minimum of one course generating a full FTE in addition to the per course funding through the Online facility.
  - The Facility’s calendar identifies ten fewer school days where the School is closed to students (there are no scheduled classes). The Facility uses the first week (five days) to do intake interviews and write/review Individual Education Plans (September 5 to

September 11), for three days (January 29 to January 31) and two additional days (November 10, and April 19) for student report card reviews.

- Student files to verify an Alternate Education Program were difficult to navigate (multiple copies of the same Student Learning Plans (SLPs), older information no longer relevant, multiple program notes, conflicting evidence for schedules and services, etc.). SLPs and Individual Education Plans (IEPs) were vague on the reason for student placement in the Facility.
  - SLPs are to include complete dates (day/month/year) and signed as required.
  - Many of the SLPs had contradicting dates.
  - A selection of SLPs were missing or incomplete. The SLPs were regularly missing transition plans and exit plans. There was no clear evidence of the provision of an Alternate Education Program identifying differentiated instruction.
  - Student attendance reports were frequently not in alignment with the stated dates of service.
  - There was no tracking system to ensure all supplemental student supports/servicing were separate and distinct from the requirements of an Alternate Education Program. For all schools, the supplemental services are to be in addition to any option available to the general student population. As further indicated in the Alternate Education Program policy which says: *“English Language Learner, Indigenous Education, and Special Needs funding are also provided if criteria are met for those respective policies”*.
- **CAREER PROGRAMS:** The District offers students a wide variety of Career Education options including Work Experience (WEX), Youth Train in Trades (TRN), and Youth Work in Trades (WRK). Students at Handsworth Secondary are supported with a Career Facilitator Teacher, District Career Coordinator and District Principal.
  - There was no evidence of the required guidelines if WEX12 options are to be provided by the District and claimed for Ministry funding contrary to the Work Experience Order and the Ministry-Authorized Work Experience Courses and Workplace Safety Policy.
  - In accordance with the [Work Experience Order M237/11](#): *“Before a board arranges a Work Experience placement, the board must establish guidelines respecting the conduct, supervision, evaluation and participation of students in the Work Experience”*; and, as stated in the [Ministry-Authorized Work Experience Courses and Workplace Safety Policy](#) *Those involved in Work Experience 12A/B electives must follow required steps to address workplace safety and related student insurance coverage...Boards of education and independent school authorities must establish guidelines respecting the conduct, supervision, evaluation and participation of students in all school-arranged work placements. School personnel must monitor each student on a school-arranged work placement as determined by board/authority guidelines.*
  - Student Training Plans are to be developed for both unpaid and paid placements. Educators are to ensure that student training plans outline the goals for learning and skill development for each WEX12 placement and demonstrate a student’s progress through the curricular learning standards and job-specific skills for each of these courses. As indicated previously, there was a lack of understanding that training plans for students

undertaking WEX 12A/B required distinct and separate training plans for each course. This is also a requirement for the four Ministry Authorized WRK options.

- There was no evidence of a District communication plan to provide feedback aligned with the Youth Train in Trades directives.

- **ACADEMIES:** The District runs many Academies. It was estimated that ten percent of the District's student population is involved in an academy. Various academies have been in place for a number of years (i.e., Hockey). As new initiatives arise, new academies are created to serve those students (i.e., Robotics). It was verified that a number of practices are not aligned with the *School Act*, related Regulations and funding eligibility directives.

**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.**

- [Specialty Academy Criteria Regulation 219/08](#) *Specialty academy criteria*
  - 1 For the purposes of the definition of “specialty academy” in section 82.1 of the School Act, the criteria set out in sections 2, 3 and 4 are prescribed criteria for a specialty academy. *Additional Learning Outcomes*
  - 2 The specialty academy must meet learning outcomes that (a) are in addition to the learning outcomes that a standard educational program must meet, and (b) reflect an emphasis on a particular sport, activity or subject area. *Minimum hours of instruction*
  - 3 (1) In this section, “credit” has the same meaning as in Ministerial Order 302/2004, the Graduation Program Order. (2) In respect of the particular sport, activity or subject area being emphasized in the specialty academy (a) a one-year specialty academy must include (i) a minimum of 240 hours of instruction, or (ii) sufficient hours of instruction to enable a student to earn 8 credits in the school year, and (b) a multi-year specialty academy must include (i) a minimum of 120 hours of instruction, or (ii) sufficient hours of instruction to enable a student to earn 4 credits in each school year. *Emphasis on particular subject area*
  - 4 If the specialty academy emphasizes a particular subject area, the subject area must be (1) Applied Skills, (2) Fine Arts, (3) Language Arts, (4) Mathematics, (5) Physical Education (6) Science, or (7) Social Studies
- 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.
- BC resident out-of-district students are currently charged a fee of \$935.00. These funds are considered an additional programming fee, and do not cover any costs for the academy and are not in alignment with the speciality academies directives for fees charged for goods and services which are necessary to meet the required learning outcomes. The District reviewed the history of this process and came to the conclusion that they will no longer charge this fee as of the date of the audit. Five BC resident out-of-district students were enrolled in an academy. Three of the students have transitioned to full-time North Vancouver School District students and have been refunded their out-of-district academy fee. At the time of the audit two students/families had not yet been reimbursed.
- The District keeps approximately 10% of the academy program fee charged to BC resident students. This amount is used to offset administrative costs associated with the academy program, which includes the cost of processing program applications, and fee processing via the School Cash Online system (4.29% per dollar.)

- Each of the academies requires a 10% non-refundable deposit which is payable after students are accepted into the Academy. These fees range from \$50 to \$240. The District maintains that although the wording of the deposit is “non- refundable”, in practice once the deposit is received and placement is confirmed, the amount functions as the cost of the first month of service. If a family withdraws from the Academy prior to the start, the District’s practice is to refund the total amount paid including the deposit. If the withdrawal is after the start date families are to be refunded the cost of the service they have not received.
- The students are offered the opportunity to apply for a ‘bursary’ once they have been successfully placed in an academy. All information on academies asks parents for a non-refundable fee and this language may lead to a misunderstanding for parents and may preclude participation by students/parents who cannot afford the apparent academy fees. If families are offered an academy placement they get a ‘bursary application’ from the academy service provider. The service provider determines the recipients. Service providers may choose to ‘reward’ two full bursaries or divide the dollar amount among various recipients.
- For academies, the District’s practice is not in alignment with their stated Financial Hardship Policy 706 - School Fees, which states: *The principal of a school: Shall ensure communications regarding fees include a reference to the possibility of a fee waiver in cases of financial hardship and the means by which such a waiver may be obtained. Shall encourage staff, where appropriate, to advise parents/guardians directly of the means by which a fee waiver may be obtained. Shall make certain that there is fair, consistent and confidential procedure for waiving a fee, in whole or in part, for cases where a student would not be able to participate in activities due to financial hardship.* Yet, the actual practice for their ‘Hardship’ process, it is the companies not the district personnel, who are responsible for selecting which students to assist. When the bursary applications are received the District transfers this responsibility to the service provider to determine the recipients.
- At the time of the audit, the District staff were unable to locate all the information regarding the Board’s establishment of each specialty academy and/or corresponding evidence of parent advisory council’s consultation.
- At the time of the audit, the District staff were unable to provide definitive evidence of Parent Advisory Council involvement in annually approving fees for academies.
- The District staff were only able to provide the financial breakdown for two of the academies to identify how student fees correspond to the provision of goods and services as per the requirements of an academy. The District staff maintained that each Fall all academy fees are reviewed for the following academic school year with determination of academy program fees done collaboratively between the school district and the academy service provider.
- Given the findings during the audit and the disconnect of current practices and the Ministry directives, the District staff were asked to provide full financial details for each academy to the Ministry.

- **ENGLISH LANGUAGE LEARNING (ELL) SUPPLEMENTAL SERVICES:**
  - At Handsworth Secondary School the focus of the ELL program is to develop listening, speaking, reading and writing skills. Students new to the District are assessed in late August at the Education Service Centre at the District office. If a new student enrolls after this date, the assessment is completed at the school level. Students transitioning from other Districts may have an Annual Instructional Plan on MyEdBC that a school can access. If not available, the school reviews the student's paper file when it arrives.
  - Annual assessments take place in the Spring. The ELL specialist at the school completes the reassessment. If this does not occur in the Spring, the student will be reassessed at the beginning of the next school year. The annual assessment evaluates student proficiency in reading and writing.
  - Progress in the development of English language proficiency is reported to parents in each of the school's regular reporting period.
  - The ELL teacher at Handsworth Secondary has specialized training in ELL methodology and has experience teaching English as a Second Language in international schools. The ELL teacher creates the Annual Instructional Plan based on the annual assessment and the teacher's knowledge of student needs. Annual Instructional Plans were dated after September 29, 2022.
  - There is a Consultation Log that tracks each session of the ELL Seminar session that the student attends and tracks the emails forwarded from the ELL specialist teacher provided by the District.
  - The ELL teacher does not consult directly with teachers given there is no instructional time provided, making it difficult to help the teachers with the required services and adaptation and/or time to document services provided.
  
- **INDIGENOUS EDUCATION SUPPLEMENTAL SERVICES:**
  - **Handsworth Secondary School** - The Indigenous Support Teacher at Handsworth is assigned one teaching block at the school. There is also an Indigenous Support Worker assigned who provide students with rich language/culture, social/emotional and academic support. The program's record keeping does not capture the fullness of the program for these students.
  - **Mountainside Secondary School** - An Indigenous Support Teacher along with an Indigenous Support Worker collaborate to support the language/culture, social/emotional and academic needs of their students. The staff are knowledgeable about the program and students. While it is evident that students are being supported at this site, there appears to be a disconnect in the record keeping between the stated dates of service and the students' records of attendance.
  - **Eslaha7an (Ahslawhahn) School Program** is part of the Alternate Education Program and is located in a building on the territory of the Squamish people. The building has a long history on this site and currently supports students with Indigenous ancestry. The Indigenous Support teacher works alongside their Indigenous Support Worker to enable success for the students. The staff are dedicated to the program and work hard to support language/culture, social/emotional and academic success for their students.

- **SPECIAL EDUCATION SUPPLEMENTAL SERVICES:** In an interview, the District Principal of Learning Services provided insights into the District’s approach to Inclusive Education. The District employs a tiered support model where learning services teachers collaborate closely with classroom teachers. This partnership focuses on applying universal design for learning and differentiation strategies to ensure that students are included in the regular classroom setting as much as possible. Additionally, a District Screening Committee plays the role of overseeing category designations for students. This Committee evaluates requests by reviewing submissions packages, including a review of the key behaviours, the effectiveness of previously implemented supports and interventions, and the need for specialized programs and supports within the district. Furthermore, the committee is responsible for managing referrals to the Alternate Secondary School, a facility dedicated to providing at risk youth with more individualized and intensive supports and interventions. The Director of Learning Services was the primary contact through the audit. At the end of each day meetings were held by the audit team with the Director of Learning Services to keep the Superintendent apprised of the audit progress and outcomes.
  - Two issues required a special meeting, as not always was there evidence in the student file of the medical assessment that met criteria for the Physical Disability/Chronic Health Impairment Category (Code D). The medical assessments were provided when requested for all student files. Nor was there always evidence of the impact of the physical disability or chronic health impairment on the student’s functioning and education. Evidence of the impact was provided when requested.
  - One student claim for the Moderate to Profound Intellectual Disability Category (Code C) did not have evidence to meet criteria. There were no assessments of cognitive and adaptive functioning to support the category as outlined in the [Special Education Manual of Policies, Procedure and Guidelines](#). There was evidence of assessment data verifying a diagnosis of Downs Syndrome. The current IEP had goals, objectives and services supporting the criteria for Code D.
  - One student claim in Code D with Type 1 Diabetes, did not have evidence that the student’s functioning and education was significantly impacted by the student’s chronic health impairment. An Instructional Support Planning Rubric for Code D from the current year for Grade 12, as well as one from Grade 9 indicated a mild level of impact on the student’s functioning. The IEPs Progress Report for Grades 10 to 12 all indicated that the student was able to manage the diabetes with minimal support. Without evidence to meet the eligibility requirements for a special education designation the recommendation was for declassification from any special education supplemental category.
  - There were four student category designations that are recommended for reclassification in the 2024/25 school year:
    - For one student claim in Code D it was verified that the student was becoming less impacted by their physical disability.
    - For one claim in Code D for a student with Distal Arthrogryposis there was no evidence of a medical diagnosis in the file. The medical diagnosis was provided when requested. The instructional support planning rubric for Code D dated January 20, 2024, identified a moderate level of impact in four domains. There was evidence of gaining independence and staff noted that the student is working toward becoming increasingly independent with his physical therapy exercises.

- One student claim in Code H for a student with a general anxiety disorder and ADHD did not have evidence of planning that was coordinated across agency and community. The Coordinated Planning Across Agency and Community form with evidence of interagency case management was provided upon request with one entry in the form. Based on the evidence, the designation is to be reclassified to the Students Requiring Moderate Behaviour Support or Students with Mental Illness Category (Code R) for the 2024/25 school year unless there is sufficient evidence of a significant impact of the mental illness on the student's functioning and education, and there is evidence of ongoing integrated case management.
- One student claim in Code H for a student with anxiety and anorexia nervosa did not have evidence in the student file of planning that was coordinated across agency and community. The Coordinated Planning Across Agency and Community Form with evidence of interagency case management was provided when requested. The District had completed a Request for Ministry Identification Form dated January 18, 2024, to indicate a change in designation from Code H to Code R.
  - This is the first year the District implemented Competency-Based IEPs. There were instances where the IEPs did not contain goals that aligned with the category claimed and goals did not contain measurable objectives or methods of measuring progress. One IEP for a student new to the District did not have an IEP developed until February 4, 2024. The previous IEP was dated September 14, 2022.
  - Most Code H student files for Intensive Behaviour Supports/Mental Illness, contained a considerable amount of evidence to support the additional services being provided to students. The Coordinated Planning Across Agency and Community form used by the District in most cases provided a log of communication between the District and the Outside agency.
  - The District staff utilize a number of forms helpful in verifying the special needs services/supports including the District Resource Team Referral and the Coordinated Planning Across Agency and Community. The Ascent Program in the Alternate Education Program Facility used an Integrated Case Management record and a Transition Plan form.

## **Recommendations**

The auditors recommend that:

- The secondary schools align their reporting practices with the directives of the Form 1701 Instructions which 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.* Ensuring that there is a process in place to confirm students are not claimed for duplicate courses whether within their own school or for those students who are cross-enrolled.
- The District staff adhere to the WEX12 guidelines including the requirements specific to the preparation of training plans for WEX 12A and WEX 12B courses. These training plans are to be separate and distinct for each course.
- The District staff ensure all ELL students, including those enrolled in a school with a semestered timetable are receiving continuous support throughout the school year as per the requirements of the [ELL Policy and Guidelines](#) and the Form 1701 Instructions which says:

*For secondary students there must be some evidence of support services in September although it may be appropriate to increase the level of service in the second semester based on scheduling of the student's courses or course load. **Service that is deferred entirely to a later time (i.e., there is no support or planning in evidence at September 29) will not be funded.***

- Mountainside Secondary staff ensure all students claimed for funding are in attendance and receiving the required specific service and supports aligned with the Alternate Education Program Policy. If the programs meet the requirements for an Alternate Education Program Facility (a Type 3 Facility), then these student claims qualify for full FTE funding to the school district.
- The District staff ensure all BAA courses offered in the District schools meet the BAA course directives in accordance with 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 that do not meet 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 Board review the District's BAA policy and procedures to ensure a regular review cycle and submission process for BAA courses is in place aligned with Ministry requirements.
- The District staff cease offering any options identified as BAA courses that are not currently meeting Ministry requirements including ensuring that when offering any BAA course they do not overlap with Ministry Authorized options and are not remedial in nature.
- The Alternate Education Program Facility staff ensure that their student population are in attendance and that the number of instructional hours are aligned with the instructional requirements outlined in the *School Act*.
- The Alternate Education Program Facility staff ensure all SLPs and IEPs are reviewed annually, clearly defining the objectives for the student, additional services provided as required, progress made, and any transition plans in accordance with the Alternate Education Program Policy and Form 1601's definition of an Alternate Education Program Facility (Type 3).
- The Alternate Education Program Facility staff implement more accurate methods to document and report attendance ensuring there is a process retaining all information regarding each student claimed including those who were reported for funding and relocated subsequent to the Form 1701 claim.
- The Alternate Education Program Facility staff establish reliable tracking systems to ensure that in addition to evidence aligned with the Alternate Education Program Policy any supplemental supports and services are met with evidence to verify those claims.
- Before arranging further Work Experience placements, the Board must establish guidelines with regard to the conduct, supervision, evaluation and participation of students in the Work Experience courses as per the Work Experience Order M237/11.

- The District Career staff ensure all the directives aligned with the WEX Guidelines, Policy and Legislation Order are known, put in to practice and adhered to when reporting Ministry Authorized WEX12 claims including training plans and agreements.
- The District Career staff develop a communications plan for their TRN program detailing how the District will regularly communicate with and solicit feedback from students, parents, school based staff, school district technical training providers and industry partners regarding the development, delivery, progress and results of industry training programs delivered under Youth Train in Trades.
- The secondary school staff review the requirement for ELL teachers to ensure that there is the ability to meet the Form 1701 Instructions which says: *“Where the additional services provided to the student are adaptations, there must be documentation of support provided that is specifically designed to address linguistic needs of each student identified in the assessment referenced above”*.
- The District Principal of Indigenous Education Programming arrange assistance for the Indigenous Support teachers at the secondary schools and Alternate Education Program Facility to identify and implement effective record keeping procedures for services and programs for the students reported as receiving Indigenous Education services including information as evidence that the Indigenous Education Programs or Services provide a continuum of substantive learning experiences and/or support services throughout the school year.
- The District Principal of Indigenous Education Programming programs work with the staff at the Alternate Education Program Facility to create tracking and information procedures which would articulate the Indigenous services which are supplemental and in addition to the services over and above those provided as Alternate Education Programming.
- The District staff immediately cease the ineligible practice of charging fees not aligned with the *School Act* and provide refunds to any BC resident students enrolled in a district academy.
- The District staff ensure they follow their own Hardship Policy for Academies. In particular, the portions of the policy pertaining to how to inform parents about this policy. Further, the District refrain from relying on the service provider businesses to make decisions about Hardship fund recipients and ensure all decisions are in alignment with Provincial directives.
- The Board ensure that they are in alignment with all requirements for Section 82.1 of *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 ensure that for each specialty academy there is a transparent breakdown of all costs to ensure that the fees charged for goods and services are necessary to meet the required learning standards.
- The District ensure that there is documentation to support that the students in Code C have been appropriately assessed and identified as meeting the criteria listed in the Special Education Manual of Policies Procedures and Guidelines.

- The District ensure student claims in Code D meet the criteria listed in the Special Education Manual of Policies Procedure 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 student's education and achievement.
- The District encourage wide-spread use of instructional planning tool to verify the impact of the physical disability or chronic health impairment on the students' education and functioning for Code D.
- The District ensure the medical information regarding the students claimed is current and that processes are in place for declassifying students when they no longer meet category placement.
- The District ensure a review process to determine if students meet criteria in subsequent years.
- The District 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's Inclusive Education staff be required to undertake a Ministry sanctioned workshop on writing effective competency-based IEPs.
- Based on the audit findings, a return audit be scheduled to ensure the recommendations in accordance with Ministry directives are put into practice.

### **Auditors' Comments**

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