

Auditor General of British Columbia

CONTENTS

Auditor General's comments	3
Summary of recommendations from 2015 audit	5
Response from the Ministry of Education	7
About the audit	10
Introduction	10
Background	10
Progress audit scope and method	15
Progress audit criteria	15
Progress audit objective and conclusion	16
Progress audit objective	16
Progress audit conclusion	16
Key findings	17
Recommendation 1	17
Recommendation 2	18
Recommendation 3	20
Recommendation 4	20
Recommendation 5	21
Recommendation 6A	23
Recommendation 6B	23
Recommendation 7	25
Recommendation 8	27
Recommendation 9	29
Recommendation 10	29
Recommendation 11	30

Audit quality assurance

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The Honourable Darryl Plecas Speaker of the Legislative Assembly Province of British Columbia Parliament Buildings Victoria, British Columbia V8V 1X4

Dear Mr. Speaker:

I have the honour to transmit to the Speaker of the Legislative Assembly of British Columbia the report, *Progress Audit: The Education of Aboriginal Students in the B.C. Public School System.*

We conducted this audit under the authority of section 11(8) of the *Auditor General Act* and in accordance with the standards for assurance engagements set out by the Chartered Professional Accountants of Canada (CPA) in the CPA Handbook – Canadian Standard on Assurance Engagements (CSAE) 3001 and Value-for-money Auditing in the Public Sector PS 5400.

Carol Bellringer, FCPA, FCA

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Auditor General

Victoria, B.C.

June 2019

32

The Office of the Auditor General of British Columbia would like to acknowledge with respect that we conduct our work on Coast Salish territories. Primarily, this is on the Lkwungen-speaking people's (Esquimalt and Songhees) traditional lands, now known as Victoria, and the WSÁNEĆ people's (Pauquachin, Tsartlip, Tsawout, Tseycum) traditional lands, now known as Saanich.

AUDITOR GENERAL'S COMMENTS

IN 2015, WE CARRIED OUT an audit of the education of Aboriginal students in the B.C. public school system. Ten years earlier, the B.C. government had committed to close the social and economic gaps between First Nations and other people in British Columbia—including a commitment to achieve parity in education outcomes for Aboriginal and non-Aboriginal students by 2015. We concluded that there were still gaps and made 11 recommendations to assist the Ministry of Education (ministry) in closing them. (In this report, we refer to 12 recommendations as we treated Recommendation 6 as two for the purpose of this progress audit).

This report captures the follow-up work my office has to done to examine the ministry's progress in implementing the recommendations from our 2015 audit. Overall, the ministry has taken substantial action to address them.

We found that the ministry has made progress on all 12 of our recommendations, including four that it has fully implemented. Another five are likely to be fully implemented once the ministry completes its actions currently underway and planned. With the final three recommendations, the ministry has taken some action but still has work to do. Exhibit 2 on page 16 shows more detail on the ministry's progress in implementing our recommendations.

Full implementation of our recommendations requires multiple parties to be part of the solution: government, school districts, teachers, parents, students and Indigenous communities. During the progress audit, we heard about increased government collaboration with Indigenous leaders and communities.

In our original 2015 audit, we found, among other things, that there are gaps between Indigenous and non-Indigenous students in reading, writing and math assessments; in graduation rates; and in how safe they feel in school. These gaps can have a huge impact on students' futures.



CAROL BELLRINGER, FCPA, FCA

Auditor General

AUDITOR GENERAL'S COMMENTS

Graduating from school improves life chances, such as jobs, health and well-being. In 2015, the graduation rate for Indigenous students was 24% lower than for non-Indigenous students. The gap in graduation rate between Indigenous and non-Indigenous students in the last school year was 16%. While there has been improvement, the system is still not supporting Indigenous students to have the same success that non-Indigenous students enjoy.

Because Indigenous students are a faster growing segment of the student population and a vulnerable group, the stakes are high for them, their families and communities, and the province. The education system has made progress and the gaps are getting smaller, but the ministry needs to continue its work to close the gaps.

I would like to thank the staff at the ministry for their cooperation and assistance during our work on this audit, as well as the many individuals from school districts and Indigenous groups with whom we spoke.

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June 2019

SUMMARY OF RECOMMENDATIONS FROM 2015 AUDIT

WE RECOMMENDED THAT THE MINISTRY OF EDUCATION:

- collaborate with boards of education, superintendents, and Aboriginal leaders and communities to develop a system-wide strategy with accountabilities to close the gaps between Aboriginal and non-Aboriginal student outcomes.
- 2 provide support to boards of education and superintendents to ensure they have the capacity to achieve results.
- 3 take action when school districts have not achieved expected results for Aboriginal students.
- evaluate the effectiveness of targeted funding and enhancement agreements as strategies to close the gaps in education outcomes between Aboriginal and non-Aboriginal students, and use the results to improve its policies to better support Aboriginal student outcomes.
- work with boards of education to ensure School Completion Certificates are only granted to students who require a modified program due to a special need that prevents them from working toward graduation.
- **6A** collaborate with boards of education, superintendents, and Aboriginal leaders and communities to provide all students with a curriculum that addresses the past and present effects of the colonization of Aboriginal peoples in British Columbia.
- 6B collaborate with boards of education, superintendents, and Aboriginal leaders and communities to address obstacles to ensuring safe, non-racist, culturally relevant learning environments through teacher professional development, cultural awareness training, and strategies to hire the best people to work with Aboriginal students.

SUMMARY OF RECOMMENDATIONS FROM 2015 AUDIT

- 7 collaborate with boards of education, superintendents, and Aboriginal leaders and communities to define and implement standardized monitoring and assessment of key indicators of Aboriginal and non-Aboriginal students' progress at key stages throughout their school career.
- 8 establish responsibility within the ministry for developing a systematic approach to data analysis on Aboriginal student achievement.
- 9 use the evidence from ministry data analysis to inform decision making and clarify expectations of boards of education.
- support superintendents in their work with boards of education, staff, Aboriginal leaders and communities and other districts, to develop capacity to use data and evidence to plan for Aboriginal student achievement.
- collaborate with boards of education, superintendents, and Aboriginal leaders and communities, to define and implement expectations for regular provincial and district reporting on:
 - Aboriginal student (on- and off-reserve, First Nations, Métis and Inuit) achievement
 - progress in meeting targets to close the gaps
 - effectiveness of strategies for Aboriginal students

RESPONSE FROM THE MINISTRY OF EDUCATION

THE MINISTRY OF EDUCATION has a responsibility to Indigenous students, their caregivers and communities to provide high-quality learning experiences and improve educational outcomes. The Ministry is committed to aligning those efforts with the commitments to the United Nations Declaration on the Rights of Indigenous Peoples, the Calls to Action of the Truth and Reconciliation Commission and the draft Principles that Guide the Province of British Columbia's Relationship with Indigenous Peoples. The Ministry fully supports the rights of Indigenous peoples to have control of, and decision-making responsibility for, Indigenous education, and is committed to continuing to work with First Nations partners who are interested in moving towards jurisdiction in education.

The education system is complex and multi-faceted, requiring the collaborative efforts of many partners and rights holders to be successful. The Ministry co-leads the public education system with Boards of Education; but is also involved in government-to-government relationships with First Nations (through the First Nations Education Steering Committee) and the federal government. The Ministry remains committed working in partnership to support systemic change within the public education system to better address the needs, cultures, histories, languages and perspectives of Indigenous students, and maintains the position that doing so will benefit all students.

The Ministry's Service Plan provides clear direction to improve student outcomes for Indigenous students. This is supported by two objectives:

- Closing the performance gap between Indigenous and non-Indigenous students, and
- Improving Indigenous students' sense of belonging in schools.

Additionally, the Ministry's policy for Student Success focusses on putting all resources and efforts into helping all students succeed regardless of their background or where they live. It also has a specific commitment to building capacity in school districts to use evidence-based approaches to eliminate equity gaps.

In July of 2018, the Ministry entered into the BC Tripartite Education Agreement (BCTEA) with the First Nations Education Steering Committee (FNESC) and the Government of Canada (Indigenous Services). BCTEA reflects a stronger government-to-government relationship, a focus on First Nations control and decision making over education and an equitable funding model regardless of where students choose to live. The agreement is based on improving educational outcomes through increasing transportation to public schools, strengthening local relationships between Boards of Education and First Nations, and establishing Educational Outcome Improvement Teams to improve Indigenous student success.

RESPONSE FROM THE MINISTRY OF EDUCATION

We appreciate the work undertaken by the Office of the Auditor General to acknowledge our efforts, and those of our education partners, to make the necessary shifts to drive improvement in learning outcomes and experiences for Indigenous students. Prior to 2015, the Ministry was engaged in clarifying the Evergreen Certificate policy and had begun to conceptualize the Equity in Action Project to support school districts in addressing the systemic barriers and the "racism of low expectations" referenced in the initial audit report. Additionally, the Ministry was actively in the process of integrating Indigenous histories, worldviews and perspectives into the revised curriculum as well as increasing the quality and quantity of data provided to school districts to inform their decision-making processes.

The 2015 audit helped articulate the need for these changes and reinforced the Ministry's commitment to further change. Since then, the Ministry has been dedicated to implementing the 11 recommendations that emerged from the audit findings. In this 2019 Progress Report, the OAG has acknowledged that we have fully or substantially implemented four of the recommendations (5, 6A, 8 and 9) and that we are on track to fully or substantially implement an additional five (2, 3, 4, 6B and 10). The Ministry is grateful for the recognition of these accomplishments and is also committed to make substantive progress on the remaining recommendations.

The progress that has been made is a result of the deep strategic and cultural commitment that government, the Ministry, Indigenous peoples and Boards of Education have made to telling the truth on our path to reconciliation. While there is still much progress to be made, the results are compelling: the percentage of Indigenous students achieving grade 12 completion within 6 years has gone from 62% in 2013/14 to 70% in 2017/18, the highest rate ever in the province.

The Ministry believes that the combination of the Service Plan commitments to increasing equity of outcomes for Indigenous students, the recently signed BCTEA and the current engagement on the Framework for Enhancing Student Learning will further enable robust system-wide accountabilities to support increased Indigenous student success. The Ministry has significantly improved its analytics capabilities, including the hiring of a Director of Indigenous Analytics with permanent, designated resources to further improve data collection, organization, analysis, and use in school districts to make more and better evidence-based decisions. The Ministry will continue to develop and refine key analytical products that inspire and inform calls to action for Indigenous learners, such as the annual "How are we doing?" report on Indigenous outcomes, the newly released outcomes report for Children and Youth in Care and the Ministry's system performance website that includes non-Indigenous and Indigenous outcomes for all 60 districts across numerous indicators of learning. To further improve on this foundation, under BCTEA the Ministry is undertaking a new data partnership with FNESC to continuously improve data quality, research findings, and the use of evidence by decision makers.

RESPONSE FROM THE MINISTRY OF EDUCATION

The Ministry also acknowledges that given the helpful role assessments can play in demonstrating equity gaps, and the strong desire from many Indigenous partners to ensure on-going, robust data collection, there is a need for continued commitment and engagement on this topic.

The Ministry will continue to build strong relationships with rights holders, education partners and work together with school districts to improve the learning outcomes and experiences for Indigenous students. It takes time to dismantle systemic barriers and create an on-going, sustainable spirit of collaboration and a culture of respect and reconciliation; however, we also know that we need to take intentional, meaningful action. We would like to extend our gratitude to the contributions of dedicated educators and leaders in the province as well as the Office of the Auditor General, FNESC, Metis Nation BC and our federal partners. Together, we will continue our pathway to success to build a better future for all students, their caregivers and communities.

INTRODUCTION

THIS PROGRESS AUDIT examines whether the Ministry of Education (ministry) has implemented the recommendations from our November 2015 audit, An Audit of the Education of Aboriginal Students in the B.C. Public School System.

In this report, we summarize our original audit findings, provide up-to-date information on the ministry's work in this area, and highlight the progress the ministry has made since 2015.

In our 2015 audit report, we used the word Aboriginal to encompass the three Indigenous groups (First Nations, Métis and Inuit) listed in the Canadian Constitution. Since then, both the federal and provincial governments have started using the word Indigenous. Accordingly, we use Indigenous in this progress audit, except when referencing the findings or recommendations from our 2015 audit. We use First Nations, Métis or Inuit when specifically referring to one of the groups of Indigenous peoples.

BACKGROUND

Graduating from school greatly improves a person's life chances, particularly for employment and income-earning prospects. But in 2000, only 39% of Indigenous students graduated from high school in B.C., compared to 78% of non-Indigenous students.

The provincial government made a series of commitments going back to 1999 to address the gaps

in education outcomes between Indigenous and non-Indigenous students. In 2005, the B.C. government signed the Transformative Change Accord with First Nations and the federal government. The accord included an explicit commitment to close the gaps in education over 10 years. But 10 years later, it was clear that parity had not been achieved.

In our 2015 audit, we looked at whether the Ministry of Education had exercised its duties and powers to meet its commitment to close the gaps.

At that time, we found the graduation rate gap had narrowed, but it was still significant. By 2014, the graduation rate for Indigenous students was 62%, which was 24% lower than the 86% rate for non-Indigenous students (see Exhibit 1). The gaps were wider for certain groups of students, including First Nation students who lived on reserves, Indigenous children in government care, as well as in particular school districts.

In 2017/18, there were 67,616 students who self-identified as Indigenous—about 12% of the total B.C. public school student population. Of that group, approximately 7,800 were First Nation students living on reserves.

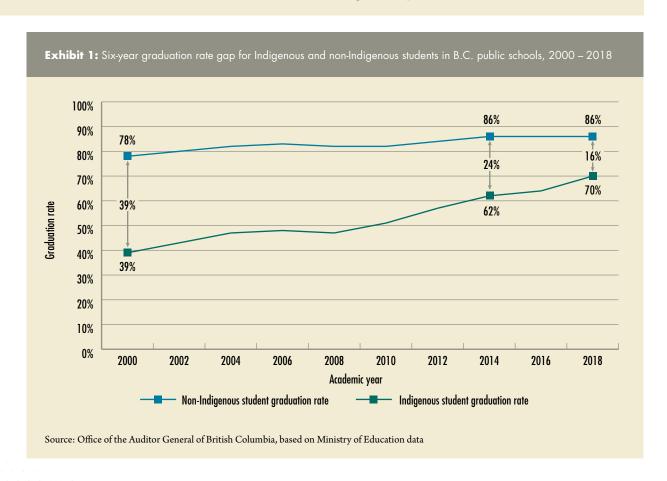
LEGACY OF RESIDENTIAL SCHOOLS

Education is what got us into this mess—the use of the education at least in terms of residential schools—but education is the key to reconciliation because we need to look at the way we are educating children." ~Senator Murray Sinclair, former Chief Commissioner of the Truth and Reconciliation Commission

For many years, schools were not safe or welcoming for Indigenous children. Royal Commission studies and the Truth and Reconciliation Commission (TRC) have described how the education system was used to colonize

Indigenous people. Residential schools and assimilation policies had, and continue to have, a traumatic impact and contribute to significant socio-economic inequities between Indigenous people and other Canadians.

In 2015, the TRC observed that gaps in education, as well as income and health, are a legacy of the residential schools. The TRC states that "The legacy is also reflected in the intense racism and the systemic discrimination Aboriginal people regularly experience in this country."



Overall, in our 2015 audit, we found that the ministry had not fully exercised its duties and powers to close the gaps in education outcomes between Indigenous and non-Indigenous students. Specifically, we found that the ministry:

- had not provided the education system with sufficient leadership and direction to close the gaps
- had undertaken limited analysis of the wide range of student outcome data it monitored to understand trends and outcomes for Indigenous students and inform change
- had reported on outcomes but not what was effective in closing the gaps

Leadership for education system to close the gaps

In 2005, the provincial government set a system-wide expectation that gaps in education outcomes would be closed within 10 years. But the nature of B.C.'s cogoverned education system meant that much of the practical core work would have to be carried out at the district level.

We expected to see the ministry leading the system to close the gaps in education outcomes. We found that the ministry had not developed a shared, system-wide strategy to close the gaps. Our 2015 report found that, "In the absence of clear direction and a focused and shared system-wide effort, the education system may continue to fail many Aboriginal students by not closing the gaps as rapidly as possible, across all districts."

A CO-GOVERNED SYSTEM

Under the *School Act*, the ministry shares responsibility for the education system with locally elected boards. The ministry funds the system, develops curriculum and sets province-wide policy. The districts deliver the curriculum, ensure provincial policy is followed, and hire/supervise educators and district staff. Other important groups with influence over how the system operates include: educators, Indigenous leaders and communities, unions and associations. The federal government and First Nation on-reserve schools also have a role in the system. This is because First Nation on-reserve students can move between the federally funded, band-operated school system and the provincial public school system.

Importance of using data to address unequal outcomes

The school system collects a tremendous amount of data from assessment, attendance tracking and the recording of student information. That data can be analyzed to demonstrate how well the system is working, where inequalities exist and what strategies are effective.

Some data is collected by the provincial government and shared back with the school districts; for example, the Foundation Skills Assessment results. Other data is collected at school and school district levels, such as report card outcomes and attendance. In 2015, we

found there hadn't always been systems in place to allow the provincial and local data to be used together to get a full picture of student progress.

Assessments can generate valuable data, but there have been challenges. Educators have expressed concerns about some province-wide assessment results being used to rank and compare schools. Thus, participation in the assessment has been low, meaning that the information gathered is not universally consistent across all student populations in B.C. and is therefore not consistently useful.

In 2015, we found that the ministry was gathering data, but not using it to evaluate the effectiveness of education programs or strategies. We also found there was opportunity for the ministry to collect and analyze additional data that could be used to support work on improving outcomes for Indigenous students.

Reporting on results is challenging

In 2015, we found that the ministry had set expectations for boards to report on student achievement, but not all districts were meeting the ministry's expectations, including its expectation that the district achievement contracts be public. We found that the "linkage between provincial targets, district achievement contracts and school plans was inconsistent and limited, accountabilities were unclear, and the ministry did not take action when results were poor."

These three key issues—leadership for the co-governed education system, the significance of data

and assessment, and the challenge of reporting—influenced our 11 recommendations (which are now distinguished as 12 recommendations, as we treated recommendation 6 as two; <u>page 5</u> for the summary of recommendations).

RACISM OF LOW EXPECTATIONS

Our 2015 report highlighted the impact of the racism of low expectations. This is the phenomenon of educators and district staff having lower expectations for students based on preconceptions or biases stemming from social attitudes.

One example of this happening in B.C. involved School Completion Certificates. The certificates, also called Evergreens, were intended to recognize the work of students with significant special needs who could not be expected to graduate from high school. But in 2015, we found Indigenous students were more likely than non-Indigenous to be granted an Evergreen—even when those students did not have a special needs designation.

Key developments since the 2015 audit

Government commitments

The Indigenous education landscape was already changing in the period leading up to the release of our 2015 report, and it has continued to shift.

During the progress audit, we heard about increased

government collaboration with Indigenous leaders and communities. In addition to the recommendations of our report, the ministry has been working through how to address its commitments in relation to:

- the Truth and Reconciliation Commission of Canada's Calls to Action
- the UN Declaration on the Rights of Indigenous Peoples (UNDRIP)
- the B.C. government's Draft Principles that Guide the Province of British Columbia's Relationship with Indigenous Peoples
- the B.C. Tripartite Education Agreement (BCTEA)

Accountability framework for school districts

Close to the end of our 2015 audit, the provincial government announced that it would replace the existing requirements for school district accountability reporting (i.e., public reporting on the goals that districts had set and their progress in meeting the goals) with a new framework. The ministry acknowledged that the previous accountability efforts had become compliance exercises, where districts submitted multiple reports to the ministry based on templates, instead of genuinely reflecting on what was needed in their own district to improve student outcomes. The new process was expected to include a

B.C. TRIPARTITE EDUCATION AGREEMENT (BCTEA)

The provincial government signed the BCTEA (2018 – 2023) with the federal government and the First Nations Education Steering Committee (FNESC). The agreement sets out how the three parties will support First Nation students. In this tripartite relationship, the B.C. Ministry of Education, the Government of Canada and FNESC are equal partners; all three parties are leaders working collaboratively. The BCTEA renewed and expanded the 2012 – 2018 Tripartite Education Framework Agreement. The scope of the agreement is specific to First Nation students and does not include Métis and Inuit students.

The BCTEA was signed at the start of our progress audit, in June 2018. Throughout our progress audit, the ministry was working on planning, or beginning to implement, its commitments.

The province's BCTEA commitments include:

- yearly non-instructional day for educators dedicated to enhancing First Nations learning outcomes
- provincial local education agreement (LEA) template for First Nations who request it
- First Nations Educational Outcomes
 Improvement Teams, created to work
 directly with districts when support is needed
- additional data provided to FNESC, and on request, First Nation community-specific student data to the First Nation to help inform them about their students' progress.

requirement for districts to set goals for, and report on, Indigenous student outcomes.

The old accountability reporting requirements were removed in July 2015. When we started our progress audit, we noted that the ministry had posted information on its website about a new accountability framework: the draft Framework for Enhancing Student Learning. The website included a general description of what would be included in a district framework report. But, the ministry never released a public policy outlining expectations or reporting dates.

We understand that as of spring 2019, the ministry has plans to launch the Framework for Enhancing Student Learning policy, including reporting expectations, for the 2019/20 school year.

Education outcomes

The Indigenous student graduation rate was 70% for the 2017/18 school year. This is the highest it has ever been.

But there is still a 16% gap between Indigenous students (70%) and non-Indigenous students (86%). And, ministry data from the Student Learning Survey (2017/18) shows Indigenous students are still more likely than non-Indigenous students to report not feeling safe in school, and to report higher rates of feeling bullied, teased and picked on.

PROGRESS AUDIT SCOPE AND METHOD

The progress audit covered the period from the date on which our original audit report was published (November 2015) to April 2019.

We reviewed documents, including strategic plans, service reports, staff presentations, curriculum and legislation. We also reviewed data supplied by the ministry, and interviewed ministry staff, consultants, school district staff and board members, and other key parties.

The report is dated June 5, 2019. This is the date the audit team finished obtaining evidence used to base the findings and conclusions of the report.

PROGRESS AUDIT CRITERIA

To conclude on whether the ministry had implemented the recommendations from our 2015 audit, we used 12 criteria that matched those recommendations (see the summary of recommendations on page 5).

PROGRESS AUDIT OBJECTIVE AND CONCLUSION



Fully/substantially implemented Partially implemented

PROGRESS AUDIT **OBJECTIVE**

We carried out this progress audit to determine whether the Ministry of Education has implemented recommendations from our Audit of the Education of Aboriginal Students in the B.C. Public School System.

We made 11 recommendations in our 2015 audit report. For the purposes of the progress audit, we treated recommendation 6 as two recommendations: 6A and 6B.

PROGRESS AUDIT CONCLUSION

We concluded that the Ministry of Education has fully/substantially implemented four recommendations, and partially implemented the other eight recommendations. Specifically, we found that:

 Recommendations 5, 6A, 8 and 9 were fully/ substantially implemented.

- Recommendations 2, 3, 4, 6B and 10 were partially implemented, but with the work that is planned—if completed—the ministry is on track to fully/substantially implement these recommendations.
- Recommendations 1, 7 and 11 were partially implemented. At this time, it is not clear whether the ministry's planned actions will result in full implementation.

Recent data makes it clear that the work to close the gaps in education outcomes between Indigenous and non-Indigenous students is not finished. The stakes are high for a sizeable and vulnerable group of students, their families and communities, and for this province.

We found that the ministry took substantial action, particularly with recommendations involving Evergreen certificates, curriculum and data analysis. More work is planned and getting underway, supported by government commitments such as the BCTEA. We also observed increased collaboration between the ministry and Indigenous groups.

THIS SECTION OUTLINES our progress audit findings for each of the 12 recommendations we made in our original audit. Under each recommendation is a summary of what we found in 2015, followed by a summary of the Ministry of Education's (ministry) progress since.

RECOMMENDATION 1: We recommend

that the Ministry of Education collaborate with boards of education, superintendents, and Aboriginal leaders and communities to develop a system-wide strategy with accountabilities to close the gaps between Aboriginal and non-Aboriginal student outcomes.

The K-12 education system operates within a complex co-governed model, with responsibility for student achievement shared between the ministry and boards of education. In our 2015 audit, we found there was a lack of clarity over roles and responsibilities for Indigenous student achievement between the ministry and boards. We stated that "the complexity of this shared accountability, compounded by the lack of a system-wide plan, resulted in neither party taking clear responsibility for closing the gaps in education outcomes for Aboriginal students."

Progress audit finding

OAG assessment: Partially implemented

The ministry drafted an Aboriginal Education Strategy in 2017, and consulted with various groups on the document. But the strategy was never signed off and released. Even if the strategy had been released, we

found that it did not address the accountabilities of school districts. As a result, the strategy did not clarify what the school districts were expected to do and how the ministry would ensure Indigenous students are successful across the province. We also found the strategy was not endorsed by a key Indigenous education organization.

The Indigenous education landscape has continued to shift since the draft strategy was created. In 2018, the province signed the renewed B.C. Tripartite Education Agreement (BCTEA) with the federal government and First Nations Education Steering Committee (FNESC) that lays out responsibilities and commitments to improve education outcomes for First Nation students. The ministry is also working on a number of initiatives to support Indigenous student achievement, described throughout this report.

There is still a significant need for a strategy that includes the multiple planned actions and clearly assigns responsibility for how the entities within the system will work together. The strategy needs to address government's recent commitments to change its relationship with Indigenous people (as described in our background section above).

RECOMMENDATION 2: We recommend that the Ministry of Education provide support to boards of education and superintendents to ensure they have the capacity to achieve results.

In our 2015 audit, we found that a number of school districts experienced a significant and persistent gap in graduation rates and education outcomes for Indigenous and non-Indigenous students. Our recommendation to address capacity called on the ministry to support districts in developing the skills, knowledge and tools necessary to close the gaps for their students. The recommendation was based on an understanding that capacity gaps would vary by district, and that the ministry would have to assess district needs and tailor its approach accordingly.

Progress audit finding

OAG assessment: OPartially implemented

During the progress audit, we looked for evidence that the ministry had assessed capacity needs across the system and had provided supports to districts, as needed. We found that the ministry's pilot program, Equity in Action, was a significant action in assessing individual district capacity and providing support. We also saw that the ministry has planned other actions, particularly in relation to the BCTEA implementation and data analysis support, which are both intended to build district capacity to close the gaps.

For example, in February 2019, the ministry seconded a district employee to a newly created role—the Lead

EQUITY IN ACTION

The ministry developed Equity in Action in 2016 as a pilot project to guide districts through an intensive year-long process of identifying and addressing local obstacles to Indigenous student success. The ministry brought in two senior employees on secondment from a school district to design and run the project. Participation by individual school districts in the pilot was voluntary. Participating districts used an internal tool to analyze their own data, and made a plan to address problem areas.

Advocate for Indigenous Learner Success. The job description for this role includes working closely with Indigenous groups, districts and partners to "identify priority supports to improve learning conditions and outcomes for Indigenous students." Under the BCTEA, the ministry plans to set up a capacity fund to assist districts in negotiating LEAs with individual First Nations.

The ministry has also begun implementing a new Building District Data Capacity Plan to provide targeted data analysis support to individual districts (see <u>Recommendation 10</u> for further detail on this plan).

The planned actions, once implemented, in addition to the work that has been done to date, should put the ministry in a position to demonstrate that it has fully addressed this recommendation.

RECOMMENDATION 3: We recommend that the Ministry of Education take action when school districts have not achieved expected results for Aboriginal students.

This recommendation called on the ministry to intervene in districts with consistently low achievement rates for Indigenous students. These could be districts where other, less directive types of engagements were tried, but had not made a difference.

In our 2015 audit, we found that the ministry had appointed a Superintendent of Aboriginal Achievement to work with districts with poor results, but the position was eliminated in 2015 as part of legislative changes. At the time, the ministry had the legal authority to appoint a special advisor, issue administrative directives, or replace the board of trustees with a ministry appointee to address lower than expected student achievement in school districts.

We noted various examples of the ministry appointing a special advisor to school districts to address poor financial management, but only one instance between 1999 and 2014 where a special advisor was appointed to address problems with student achievement.

Progress audit finding

OAG assessment: OAG assessmented

For the progress audit, we did not expect to see that the ministry was appointing a special advisor in every situation, and we understood it was reasonable for the ministry to rely on a continuum of interventions with school districts. However, we looked for evidence that the ministry was using different techniques to engage with all struggling districts, and that in some cases, the ministry would likely need to act more directly with an intervention such as a special advisor.

We saw three examples in 2018 of the ministry assigning special advisors to districts to help with issues that had implications for Indigenous student achievement. Other than these three special advisors, we did not see other direct interventions for districts with poor results for Indigenous students. However, there were districts with consistently low results for Indigenous students where we would have expected to see the ministry step in—and we did not see evidence of action being taken.

Under the BCTEA, the ministry is planning for team-based intervention work with school districts. The teams will include a representative from FNESC, as well as individuals with expertise in the areas where districts face challenges. The BCTEA includes expectations that teams will report to the local First Nation, school board and Aboriginal Educational Council within an affected school district, as well as to senior ministry leadership who will report to the Minister of Education.

We found that the ministry had been discussing, since 2016, the possibility of district capacity support teams under the proposed Framework for Enhancing Student Learning, but an Indigenous education capacity team was never deployed. A recent draft of the framework policy included a reference to "expert, peer-based teams to support districts" in areas

such as "effective evidence use and data reporting, best practices in Indigenous learning, financial governance and reporting, or community relations and consultation." The draft policy also affirmed that, under the *School Act*, the government has the ability to escalate intervention with school districts through mechanisms such as special advisors.

The planned actions, once implemented, in addition to the work that has been done to date, should put the ministry in a position to demonstrate that it has fully addressed this recommendation.

RECOMMENDATION 4: We recommend

that the Ministry of Education evaluate the effectiveness of targeted funding and enhancement agreements as strategies to close the gaps in education outcomes between Aboriginal and non-Aboriginal students, and use the results to improve its policies to better support Aboriginal student outcomes.

In our 2015 audit, we found that the ministry had focused on two key Indigenous education strategies since the early 2000s: targeted funding and enhancement agreements. We found a wide variation in implementation of both of these strategies at the district level. Therefore, we recommended that the ministry evaluate the effectiveness of both strategies at closing the gaps, and use the evaluation findings to improve policies.

Progress audit finding

OAG assessment: Partially implemented

In our progress audit, we found that the ministry had reviewed both targeted funding and Aboriginal education enhancement agreements, but it had not evaluated their effectiveness as strategies to close the gaps. The ministry is in the process of revising its policy for targeted funding, and no longer directly supports districts to create enhancement agreements.

Targeted funding

In 2017, the ministry hired a consultant to do a scan of targeted funding models for Indigenous learning, special needs students and English language learning. The scan covered five jurisdictions in Canada and other countries. Subsequently, the ministry reviewed Indigenous and other targeted funding across all Canadian jurisdictions within the context of a broader ministry review of the provincial funding model for education. As part of this broader funding model review, in 2017, the ministry carried out research and engaged with stakeholders. This information fed into the work of an Independent Funding Model Review Panel, which carried out further research and consultations. The panel's report was published in January 2019.

The panel made a number of recommendations, including that the ministry should:

 work with FNESC to see whether policies on targeted funding for Indigenous students need to be changed

 look at how boards should be accountable for the use of all funds

At the time of our progress audit, the ministry was still consulting with the education system, and no policy changes for targeted funding had yet resulted from the review. There is a draft Indigenous Education Targeted Funding policy that is in progress as of April 2019.

Enhancement agreements

The ministry provided funding for a review of the enhancement agreements, which was carried out by university-based researchers in 2016. The review was based on a qualitative content analysis of current enhancement agreements and reports from 22 school districts, a survey, interviews and focus groups. The researchers identified key themes from the enhancement agreements and based on this analysis, made six recommendations for consideration.

In September 2016, the ministry made a decision to shift its efforts from promoting enhancement agreements to supporting the Equity in Action pilot. After 16 years of enhancement agreement support, the ministry decided that districts would be able to continue this work on their own. For those districts that had not yet signed an agreement, they would be expected to find their own ways of engaging with Indigenous communities. This decision was primarily based on policy considerations, rather than an evaluation of any link between enhancement agreements and Indigenous student achievement.

To fully implement this recommendation, the ministry

still needs to evaluate the effectiveness of targeted funding in closing the gaps between Indigenous and non-Indigenous students, and use the findings of that evaluation to improve the policy. As enhancement agreements are no longer being used as a strategy to close the gaps, the recommendation to evaluate is no longer relevant.

RECOMMENDATION 5: We recommend that the Ministry of Education work with boards of education to ensure School Completion Certificates are only granted to students who require a modified program due to a special need that prevents them

from working toward graduation.

School Completion Certificates, also known as Evergreens, were originally intended to recognize the achievement of students with significant special needs that would keep them from meeting graduation requirements. Many students with special needs such as learning or behaviour disabilities, would still typically be capable of working toward graduation. In other words, having a special need is not an automatic pathway to an Evergreen.

In our 2015 audit, we found that the Student Credentials Policy Order allowed districts to create policies to give Evergreens to non-special needs students. We found that Indigenous students were more likely than non-Indigenous students to be granted an Evergreen, both when they had a less severe special need that should not prevent them from pursuing graduation, and when they did not have a special needs designation at all.

Progress audit finding

OAG assessment: Fully/substantially implemented

In the progress audit, we were looking for evidence that the ministry had revised its policy, widely communicated its expectations to districts and monitored districts for implementation of the new policy. Further, we were looking for data to show a significant reduction in the number of students getting Evergreens when they should have been on track for graduation.

We found the ministry revised its policy to ensure that Evergreens were limited to students with special needs, and communicated the change to the districts. The ministry provided evidence that it monitored and followed up with all districts immediately after the policy change.

Data showed a significant reduction in the number of Evergreens issued after the policy change. However, there was still a small number of Evergreens going to students who would be expected to work toward graduation, and Indigenous students were still receiving a disproportionate number of Evergreens compared with non-Indigenous students.

For example, in 2017/18, 30 Evergreens were given to students in the province who never had a special needs designation. Ten of those students, or 33%, were Indigenous. Indigenous students made up 12% of the population, so they were significantly over-represented and more likely than non-Indigenous students to receive an Evergreen.

The ministry has plans to continue monitoring and following up with districts. As well, the draft provincial LEA template includes requirements for students to receive a psycho-educational assessment before being placed on an Evergreen track, and sets out clear expectations for how parents should be consulted.

LOCAL EDUCATION AGREEMENTS

The federal government provides money for the education of First Nation students who live on reserve but attend a provincial school. A local education agreement (LEA) sets out terms for a First Nation to pay that money to a school district in exchange for educating the students. Under the BCTEA and with FNESC, the province is developing a continuum of approaches to negotiate and sign LEAs if requested by a First Nation. The ministry was also discussing a draft provincial LEA template as we finalized our progress audit. The template could be used as a customizable model for negotiation.

The draft LEA template includes a number of sections with language designed to support accountability, which are mentioned throughout this report. It is important to remember that the use of an LEA is optional, and applies only to First Nation students who live on reserve but attend a provincial school.

RECOMMENDATION 6A: We

recommend that the Ministry of Education collaborate with boards of education, superintendents, and Aboriginal leaders and communities to provide all students with a curriculum that addresses the past and present effects of the colonization of Aboriginal peoples in British Columbia.

The importance of high quality learning environments and culturally appropriate curriculum for Indigenous students has been noted in government studies and agreements, including the 2005 Transformative Change Accord. In our 2015 audit, we found that Indigenous leaders and communities felt the school curriculum did not sufficiently reflect Indigenous history, knowledge and culture —in particular, issues regarding residential schools, racism and the *Indian Act*. At the time, the ministry was already working on integrating Indigenous content, knowledge and worldviews as part of a large-scale redesign of B.C.'s K-12 curriculum.

Progress audit finding

OAG assessment: Fully/substantially implemented

During the progress audit, we found that the ministry had developed and implemented Social Studies curriculum content for Grades 4, 5, 9 and 10 that specifically addressed the impact of colonization. The ministry also incorporated Indigenous content into other grade levels. For example, Grade 7 students learn about Indigenous oral history traditions as part of

English Language Arts. We also found that Indigenous community members were heavily involved with curriculum development.

The ministry has acknowledged there is still work to do, specifically in enhancing curriculum resources to bring greater focus to Métis people. FNESC continues to recommend the ministry include an Indigenous focused course as a graduation requirement for all students to further advance the work of reconciliation. There are challenges to providing professional education to support teachers in delivering the new curriculum, and this issue is addressed in recommendation 6B.

RECOMMENDATION 6B: We

recommend that the Ministry of Education collaborate with boards of education, superintendents, and Aboriginal leaders and communities to address obstacles to ensuring safe, non-racist, culturally relevant learning environments through teacher professional development, cultural awareness training, and strategies to hire the best people to work with Aboriginal students.

This recommendation was intended to address the racism of low expectations, as students and guardians may experience this kind of racism in the classroom, principal's office or in a meeting with district staff. And, it is a recommendation that highlights the complexities of a co-governed education system. The three listed areas—educator professional development, cultural awareness training for district

staff, and inclusive hiring—are the school boards' responsibility to deliver.

During our 2015 audit, we found that these were important components of promoting safe, non-racist learning environments for Indigenous students.

Therefore, we recommended that the ministry take a leadership role in supporting the districts to do this work.

Professional development and cultural awareness training may include similar content. In the context of our 2015 audit findings, professional development typically referred to supporting educators to teach Indigenous curriculum content. Cultural awareness training might be extended to any district employee, and would be focused on developing non-Indigenous staff's understanding of Indigenous peoples' history and culture.

Progress audit finding

OAG assessment: Partially implemented

During the progress audit, we found that the ministry had taken action in all three areas, but that much of the work was still at the early stages. We also found that the Equity in Action project was a significant example of the ministry leading and supporting districts in overcoming systemic obstacles for Indigenous students.

Equity in Action

The ministry developed Equity in Action in 2016 as a pilot project to guide districts through an intensive year-long process of identifying and addressing local obstacles to Indigenous student success. So far, 21 districts have participated, and the ministry has now committed to running the project for another two years with the goal of including all districts. It is too early to evaluate the long-term impact of Equity in Action. But we found it was significant evidence of the ministry leading and supporting districts in overcoming systemic obstacles for Indigenous students.

Educator professional development

The ministry required an Indigenous education professional development day in 2016, and included it as one of several content options for a professional development day in 2018. The ministry has committed, under the BCTEA, to an annual province-wide educator professional development day focused on enhancing learning outcomes for First Nation students. The revised School Calendar Regulation—which requires school boards to schedule a non-instructional day focused on both enhancing Indigenous student achievement and integrating Indigenous world views—came into effect in April 2019.

The ministry anticipates that the draft LEA template and the draft revised Early Learning Framework may be used as tools to support educator professional development. The draft LEA template includes sections for signatory boards to support professional development, curriculum and education resources related to Indigenous content. The draft revised early learning framework is an example of the ministry providing a professional development resource for primary teachers with substantial new information about Indigenous peoples.

Cultural awareness training

We found that the ministry is planning for cultural awareness training for its own staff to support implementation of the Draft Principles that Guide the Province of British Columbia's Relationship with Indigenous Peoples. We also noted that the ministry is looking for ways to support the districts with cultural awareness training.

And, under the BCTEA, the ministry has committed to cohost, with FNESC, an annual meeting for school districts to support their awareness. Areas of focus will include learning about key Indigenous education commitments, using LEAs to build relationships and contribute to reconciliation, and other First Nations education topics.

The draft LEA template includes a section that describes boards promoting "a greater awareness and inclusion and respect by all school district staff and contractors for the First Nation's unique language, culture and history through its policies, practices, plans, curriculum and instruction."

Strategies to hire the best people to work with Indigenous students

In February 2018, the provincial government committed \$260,000 for the University of British Columbia to pilot a community-based Indigenous Teacher Education Program in Williams Lake and Quesnel. The program was expected to include approximately 20 Indigenous students. In September 2018, the government also committed to funding for another 15 Indigenous teacher training seats. As well,

the draft LEA template introduces the concept that districts will involve First Nations meaningfully in district recruitment.

These are all significant steps, but much of the implementation lies ahead. The draft LEA template could be an effective tool, but it is too early to know how widely or effectively it will be adopted. Also, we heard it will be key for the ministry to ensure that all districts support meaningful professional development for educators on the new annual non-instructional day. At the time of our progress audit, the ministry had no initiatives planned to specifically support all school districts with cultural awareness training or with system-wide inclusive hiring.

The complexity of implementing this recommendation, with so many partners involved, highlights the importance of an Indigenous education strategy with clear accountabilities for the ministry and districts (see <u>Recommendation 1</u>).

RECOMMENDATION 7: We recommend

that the Ministry of Education collaborate with boards of education, superintendents, and Aboriginal leaders and communities to define and implement standardized monitoring and assessment of key indicators of Aboriginal and non-Aboriginal students' progress at key stages throughout their school career.

In our 2015 audit, we found gaps in provinciallymandated monitoring of student outcomes. The ministry collected significant amounts of student data, but it had

not monitored, or required districts to monitor, other indicators that could help address gaps in Indigenous student achievement. In addition, student participation in the required Foundation Skills Assessment (FSA) was lower than the 80% that would be required for the results to be valid in many districts. The FSA is an annual, province-wide assessment of Grade 4 and 7 students' reading, writing and math abilities.

In many districts, participation rates were even lower for Indigenous students. That low participation reduced the usefulness of the standardized assessment. The audit also found wide variation in district practices for assessing and monitoring student progress. Some districts went beyond the required FSA and provincial exams with locally-selected assessments at key stages, but there was no provincial guidance on which assessment and indicators might be most useful for supporting Indigenous student achievement.

In our 2015 audit, we also acknowledged how the complexity of a co-governed education system impacted the ministry's ability to mandate district monitoring of student outcomes. The recommendation called for the ministry to collaborate with boards, superintendents, and Aboriginal leaders and communities to define the types of assessment and monitoring that would support improving outcomes for Indigenous students, and that all groups would ensure the assessments were done.

Progress audit finding

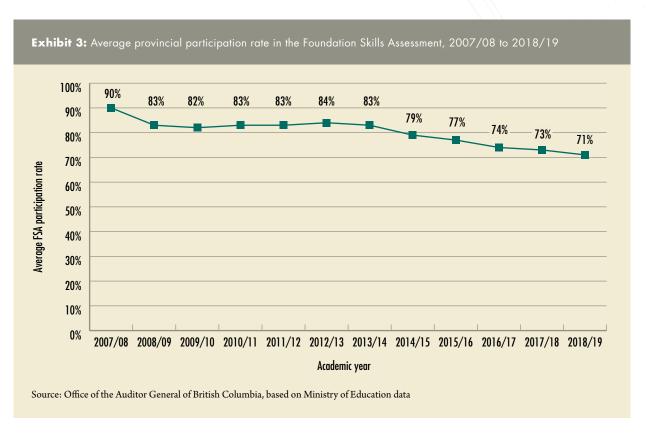
OAG assessment: OPartially implemented

In our progress audit, we found that the ministry had started to collaborate with Indigenous groups around the selection and assessment of key indicators. Under the BCTEA, the ministry agreed to establish a data committee that would, among other things, conduct an environmental scan of currently available data on the achievement of Indigenous students and identify any need for further data monitoring. The BCTEA also included a list of indicators of First Nation student outcomes that the ministry agreed to monitor and submit to FNESC.

And, the ministry collaborated with FNESC to develop the draft LEA template. The draft template includes language that could be used by First Nations and boards during negotiations to develop appropriate criteria and processes for early identification of First Nation students for special needs assessment and intervention.

We also saw that, after our 2015 audit, the ministry increased the amount of provincially collected data that was available to districts, in particular, with the revised Student Learning Survey. The ministry also developed data analysis dashboards so districts could track the performance of Indigenous student populations by subgroups (e.g., First Nation onreserve, Métis, etc.) using locally collected data.

However, we found that student participation in the FSA since 2015 has continued to decrease to the point that the provincial data may not be valid, with a 71% participation rate in 2018/19 (see Exhibit 3). During our 2015 audit, the ministry informed us that an 80% participation rate was the minimum expected to ensure the validity of the data. The union representing teachers has expressed concerns about the assessment and asked guardians to withdraw their children from the assessment. The low participation rate is creating gaps in core provincial student achievement data, and it will take collaboration with all education partners to address the gaps.



We also found there is still no standardized provincial early learning assessment.

In the 2018/19 school year, the ministry replaced provincial exams with standardized provincial assessments in literacy and numeracy. This followed the recommendations of the Provincial Advisory Group on Professional Assessment, a body that included FNESC and representatives from across the education sector. During our interviews, we heard concerns from some within the education system that ending provincial exams removed a useful check against unequal treatment in the classroom. Provincial exam scores had previously been useful as a potential indicator of bias (as we also found during our 2015 audit) because the results could be used to check

whether an Indigenous student received a noticeably lower classroom grade than the independently graded provincial exam.

RECOMMENDATION 8: We recommend

that the Ministry of Education establish responsibility within the ministry for developing a systematic approach to data analysis on Aboriginal student achievement.

In our 2015 audit, we found that the ministry did not have a clear and consistent strategy for using available data to analyze trends and outcomes for Indigenous students. This led to the concern that,

without assigning explicit responsibility, data analysis on the outcomes for Indigenous students would not be prioritized and the responsibility could be overlooked.

Progress audit finding

OAG assessment: Fully/substantially implemented

In our progress audit, we found that in December 2018, the ministry hired a director of Indigenous analytics. The director's accountabilities will include evaluating the ministry's need for data analysis on outcomes for Indigenous students, and increasing the information available. The director will liaise between two key ministry divisions—Governance and Analytics, and Learning Division—to support improved reporting and policy development. The director will also work with the data committee, established under the BCTEA.

Prior to establishing the director's position, the ministry's effort to establish a systematic approach to analyzing Indigenous student data was limited to publishing the annual *How Are We Doing?* (HAWD) report. When first published in 1999, the HAWD report included ministry analysis of outcome data. In our 2015 audit report, we noted that the amount of interpretive text in the report had decreased over time, to the point where the report simply listed the data without explaining its implications.

We found that the report was a useful monitoring tool, but that it would be strengthened with analysis and reporting of trends, patterns, successes and challenges. During the progress audit, we found that the ministry had not added an analytic component to the report. We understand that the ministry continued to publish the report without analysis at the request of FNESC.

HOW ARE WE DOING? REPORT

The ministry's annual *How Are We Doing?* (HAWD) report highlights demographic and achievement data for Indigenous students. The ministry creates a province-wide version, as well as a report for each district. HAWD contains more detail than the provincial reporting website and compares results for Indigenous students with non-Indigenous students.

This is a clearer way of identifying gaps than what is shown on the ministry's reporting website, which compares outcomes for Indigenous students to collective outcomes for all students. The outcomes for all students includes Indigenous student results, which makes the gaps look smaller. The province committed, under the BCTEA, to continuing publishing the HAWD report by December 10 of each year and to consult with FNESC before changing the structure of the report.

RECOMMENDATION 9: We recommend that the Ministry of Education use the evidence from ministry data analysis to inform decision making and clarify expectations of boards of education.

In our 2015 audit, we found that the ministry's general approach was to give data to districts through the HAWD report and leave it to them to analyze and interpret. The ministry did not have a clear and consistent strategy for using available data to analyze trends and outcomes for Indigenous students.

Progress audit finding

OAG assessment: Fully/substantially implemented

In our progress audit, we were looking for evidence that the ministry embedded data analysis in its own planning and policy work, and used that analysis to develop its expectations of boards of education for Indigenous student achievement. Ministry staff described a general cultural shift toward using data in research and analysis.

The ministry gave us four specific examples where its staff considered data before making decisions about initiatives of significance to Indigenous students. We also noted there was an increase in the budget for the ministry's Governance and Analytics branch, from \$660,000 in 2016/17 to \$1.5 million in 2018/19.

With respect to clarifying expectations for districts, ministry employees have visited multiple districts to discuss data, including, but not limited to, Indigenous student results. The visits encouraged districts to use evidence and data in decision making and to highlight data trends.

RECOMMENDATION 10: We

recommend that the Ministry of Education support superintendents in their work with boards of education, staff, Aboriginal leaders and communities and other districts, to develop capacity to use data and evidence to plan for Aboriginal student achievement.

In our 2015 audit, we found that districts varied in their capacity to collect and use student data for evidence-based planning and decision making. Some districts had strong data analysis capacity, but others struggled. We highlighted in our 2015 report the need for the ministry to take a leadership role in supporting those challenged districts, as the ministry has resources and expertise in data analysis.

Progress audit finding

OAG assessment: OAG assessmented

In our progress audit, we found that the ministry continued to make data widely available and provided additional support if a district requested it, as it had been doing prior to our 2015 audit. Subsequent to 2015, the ministry created enhanced analytic tools, such as an improved public-facing reporting website (see Exhibit 4), as well as internal data analysis dashboards for the districts.

In one instance, the ministry facilitated several districts working together to create their own data analysis tool. When invited, ministry staff gave presentations on how to use the analysis tools. And, the ministry gave data analysis support to the 21 districts that volunteered to be part of Equity in Action.

More recently, the ministry has also shown leadership by proactively approaching districts that need more support with data analysis. In February 2019, the ministry launched a new initiative called the Building District Capacity Plan. The goal is to ensure districts use data evidence to assess whether a student is on track for graduation, and help determine appropriate interventions.

The ministry will focus on districts needing the most help, with the expectation that they would work with at least 18 districts by the end of 2019/20. This work could fit well with the ministry's stated plan to officially launch the Framework for Enhancing Student

Learning, which is expected to include direction that districts use evidence-based planning.

The planned actions, once implemented, in addition to the work that has been done to date, should put the ministry in a position to demonstrate that it has fully addressed this recommendation.

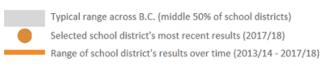
RECOMMENDATION 11: We

recommend that the Ministry of Education collaborate with boards of education, superintendents, and Aboriginal leaders and communities, to define and implement expectations for regular provincial and district reporting on:

- Aboriginal student (on- and off-reserve, First Nation, Métis and Inuit) achievement
- progress in meeting targets to close the gaps
- effectiveness of strategies for Aboriginal students

Exhibit 4: Example of the Ministry of Education's enhanced public reporting tool on its website

Student Satisfaction



Question	Grade Level	Student Group	Total Responses	0%			"Many 50%				100%
Do you feel welcome at your school?	Elementary	All Students	57,544						-	-	
		Aboriginal	3,980					0-			
	Secondary	All Students	38,606								
		Aboriginal	4,312					•			

 $Source: Ministry of Education K-12 \ Reporting \ Tool \ website \ \underline{https://studentsuccess.gov.bc.ca/school-district/099/report/student-satisfaction}$

In our 2015 audit, we found that the ministry had reported on student results for over 15 years, but there were some key gaps in data reporting. The ministry's reporting had not clearly distinguished outcomes for Indigenous student subgroups (First Nation, Métis and Inuit students). This was significant because the gaps were wider for First Nation on-reserve students compared to other groups.

The ministry had also stopped reporting the comparison of Indigenous to non-Indigenous student outcomes by district, which made it difficult to contextualize district-level progress on closing the gaps. It had also not reported on the effectiveness of strategies to close the gaps in education outcomes. Further, the ministry had not ensured the boards were meeting its existing expectations for public reporting.

Progress audit finding

OAG assessment: OAG assessmented

In the progress audit, we expected to see that the ministry had collaborated with the listed groups to define and implement expectations for regular reporting in the areas described in the recommendation. We also looked for evidence that the ministry had ensured that districts were reporting as expected.

We found that the ministry had made improvements in its own reporting through a new provincial reporting website (see Exhibit 4) and its service plans. Principles for district-level reporting have been incorporated into the draft LEA template.

We found that school boards still lack clarity about reporting expectations on Indigenous students' achievement because there is no formal accountability framework in place (see Background section above). The ministry's website stated that as of July 1, 2015, reporting required under the previous accountability framework, including achievement contracts, was no longer required, and that the draft Framework for Enhancing Student Learning was replacing the former accountability framework.

However, the new framework provided only voluntary planning and reporting guidance to districts during our progress audit period, and the ministry acknowledged that most school districts had not regularly produced plans or reports. The ministry plans to finalize an official framework policy for the 2019/20 school year, and Indigenous groups are represented on the advisory group that is working on the policy.

Until the new policy is finalized, it is unclear whether the ministry will fully address this recommendation.

AUDIT QUALITY ASSURANCE

WE CONDUCTED THIS audit under the authority of section 11(8) of the *Auditor General Act* and in accordance with the standards for assurance engagements set out by the Chartered Professional

Accountants of Canada (CPA) in the CPA Canada Handbook—Canadian Standard on Assurance Engagements (CSAE) 3001—and Value-for-money Auditing in the Public Sector PS 5400. These standards require that we comply with ethical requirements and conduct the audit to independently express a conclusion on whether or not the subject matter complies in all significant respects to the applicable criteria.

The Office of the Auditor General applies the CPA Canadian Standard on Quality Control 1 (CSQC), and accordingly, maintains a comprehensive system

of quality control, including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements. In this respect, we have complied with the independence and other requirements of the code of ethics applicable to the practice of public accounting issued by the Chartered Professional Accountants of British Columbia, which are founded on the principles of integrity, objectivity and professional competence, as well as due care, confidentiality and professional behaviour.

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