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# Performance Audits

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## 2 Education: Home Schooling

### Summary

The Department of Education is failing in its responsibility to protect the education rights of children enrolled in the provincial home schooling program. The program lacks the key elements necessary to be effective. The audit identified deficiencies with the program which significantly diminish the likelihood of the Department identifying children who may not be receiving a suitable education. If these children are not identified, the Department cannot take necessary steps to intervene and provide required support.

The Department has identified learning expectations and outcomes for the public school system. Public school students are periodically assessed to determine if they are achieving those outcomes. The Department does not have expected learning outcomes for home schooled children and does not require that the children be independently assessed to determine if they are making reasonable educational progress. The Department cannot provide effective oversight of home schooled children without clear direction on what the children are expected to know and be able to do, and a means to determine whether they are meeting those expectations. We recommended the Department establish clear and measurable expected learning objectives and outcomes and that periodic independent assessment of home schooled children be required.

The Department's processes for assessing the appropriateness of home study programs and children's educational progress are inadequate. We found the registration form and progress report template are not well-designed to provide guidance to parents, study programs are not assessed for adequacy, and the Department does not follow up to obtain additional information on incomplete or unclear study programs and progress reports. We recommended the Department assess study programs and children's progress against established expectations and document the results in its files.

The Department does not have an adequate system to track whether home schooled children are properly registered and progress reports are submitted. We also identified significant gaps in the Department's processes to track children transferring between home schooling and public school to ensure they are properly registered.

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## 2 Education: Home Schooling

### Background

- 2.1 The Education Act requires all children in the province between the ages of six and 16 to be registered and attend school. Children may be enrolled in the public school system, attend a private school or be registered for home schooling. The Department of Education is responsible for the public school system and oversight of children who are home schooled.
- 2.2 Approximately 950 children were registered for home schooling in 2010-11 and 850 in 2011-12. Roughly 128,000 students were registered in public schools in 2010-11 and 126,000 in 2011-12.
- 2.3 Two staff are currently responsible for carrying out the Department's oversight and administration responsibilities for home schooling. One person reviews and approves the home study programs proposed by parents, reviews the children's progress reports, and deals with any student-related concerns. The other person is responsible for administrative functions such as receiving and processing registration forms and reports, and maintaining the files.
- 2.4 Parents who wish to home school a child are required to register the child with the Department each year. Registration includes providing information such as the child's grade level, the last grade level attended in a public or private school, and a description of the proposed study program.
- 2.5 If a home schooled child returns to the public school system, the school determines the appropriate grade placement. Home schooled children are not eligible to receive a Nova Scotia high school graduation diploma unless all required high school credits have been completed through the public school system or through the Department's correspondence study program.
- 2.6 The Education Act gives the Minister of Education authority, upon assessment of the child, to terminate a home education program if it does not meet the requirements of the Act or if the child is not making adequate educational progress.

### Audit Objectives and Scope

- 2.7 In the summer of 2012, we completed a performance audit of the Department of Education's oversight and administration responsibilities for home schooling. The engagement was conducted in accordance with Section 18 and 21 of the Auditor



General Act and auditing standards established by the Canadian Institute of Chartered Accountants.

- 2.8 The purpose of our audit was to determine whether the Department of Education is providing adequate oversight of the education provided to home schooled children to ensure they receive an appropriate education.
- 2.9 The objectives of our audit were to determine whether:
- the Department has standards and processes for evaluating the adequacy of home schooling programs to ensure that each child's right to an appropriate education is being protected; and
  - the Department has appropriate processes to monitor the educational progress of children enrolled in a home schooling program.
- 2.10 Criteria were developed specifically for this engagement. The objectives and criteria were discussed with, and accepted as appropriate by, management of the Department.
- 2.11 Our audit covered the period from July 2010 to September 2012. Our approach consisted of interviews with management and staff; documentation of systems and processes, policies and procedures; and testing and analysis of files and records.
- 2.12 We evaluated the Department's processes for assessing home study programs and the children's progress. We did not attempt to assess the educational progress of home schooled children or whether the Department's home schooling program is an appropriate alternative to public or private schools.

## Significant Audit Observations

### Assessing Home Study Programs and Children's Progress

#### Conclusions and summary of observations

The Department is failing in its oversight responsibilities for the home schooling program. The program lacks key elements necessary to be effective. The Department does not have written policies or regulations specifying expected learning outcomes for home schooled children. Children in the program are not periodically assessed to determine if they are making reasonable educational progress. The Department's information materials, registration form and progress report template need to be improved to provide clear guidance to parents. The Department does not have an adequate process to obtain information on, and assess the appropriateness of, home study programs and the children's progress. We recommended the Department establish educational objectives and learning outcomes for

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the program and assess the appropriateness of home study programs and children's progress against established requirements.

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- 2.13 *Educational requirements* – The Education Act and regulations outline public school and home schooling requirements. The Department has identified six essential areas of learning for the public school system and learning expectations or outcomes at each grade level. Students in the public school system are periodically assessed to determine if they are achieving the expected learning outcomes. Through monitoring and assessment, schools can identify students that are experiencing difficulties in meeting the learning expectations. Schools may then provide assistance to those students to help them achieve the expected grade level of education.
- 2.14 The Education Act and regulations do not specify what home schooled children should know and be able to do (learning outcomes). The Department does not have written policies concerning expected learning outcomes for home schooled children. The Department also does not require that children enrolled in home schooling be independently assessed to determine if they are making reasonable educational progress. Without clear and measurable objectives and outcomes, there is a risk that the home study programs for some children may not be providing them with a suitable education.
- 2.15 The Education Act outlines the need for and right of children to develop their potential and acquire knowledge and skills. The Department has the responsibility to see that the means to accomplish this is provided. The Department has established expected learning outcomes for the public school system. These could also be used for the home schooling program and revised as necessary, or the Department could create new ones specifically for home schooling. The Department cannot effectively assess the adequacy of home school programs and ensure home schooled children are receiving a suitable education if learning expectations and outcomes are not clearly defined, and periodic, independent assessment of the children is not carried out.

***Recommendation 2.1***

***The Department of Education should establish clear and measurable learning objectives and outcomes for the home schooling program.***

***Department of Education Response:***

*The Department will move forward with a two-step strategy to respond to identified concerns and to develop a rigorous, accountable, and clear framework for home-schooling in Nova Scotia. The strategy will comprise short-term actions to address areas that must be addressed immediately and longer-term strategic actions to revise the legislative and policy framework for students who are home schooled in Nova Scotia. As noted in 2.14, current legislation does not identify specific curricula or specific learning outcomes for students who are home-schooled. Longer-term strategic actions will be developed over the next year which will include reviewing the legislation and regulations which govern home-schooling in the province and developing a new legislative and policy framework.*



*The framework will include consideration of appropriate educational standards and outcomes for students who are home schooled, and the role of local schools and school boards with regard to students who are home-schooled.*

***Recommendation 2.2***

***The Department of Education should require periodic, independent assessment of home schooled children against learning objectives and outcomes.***

***Department of Education Response:***

*The framework described in 2.1 will include consideration of mechanisms to assess educational progress of students who are home schooled.*

- 2.16 *Assessing program plans* – The Department’s website and information package provide material for parents to guide them in developing and implementing home schooling programs. The Department told us these materials need to be updated and improved. Some of the material uses language and terms that may not be familiar to parents. Information should be written in plain language that parents can fully understand and consider for their programs.
- 2.17 The Department’s registration form and progress report template do not provide sufficient guidance to parents on how to outline the program plan, which examples of the child’s work to provide, or the type of information to include with the child’s progress report. Without sufficient and complete information, the Department cannot adequately assess whether a proposed home schooling program is appropriate.

***Recommendation 2.3***

***The Department of Education should revise its home schooling material to provide clear information and guidance to parents on how to outline the program plan and the type of information to provide, including examples of the child’s work, in the yearly progress report.***

***Department of Education Response:***

*The framework described in 2.1 will consider the required support for parents in developing program plans for their children.*

- 2.18 Parents have several options when developing a home schooling program. They can choose the Nova Scotia public school curriculum through correspondence courses, follow one of the many commercial home study programs available, develop their own curriculum, or follow a combination of these choices.
- 2.19 The Department has not carried out an in-depth assessment of any of the commercial home study programs to determine if they are designed to achieve appropriate outcomes. Staff indicated they are aware of the content of most of the commercial programs that parents are using.

- 2.20 If a proposed study program is developed by the parent, staff told us they review the program to determine whether the core areas of learning, such as mathematics, writing and reading, are included. From our testing, we found little evidence that staff followed up with parents if the information on the study program was not sufficient. This is discussed further throughout this chapter.
- 2.21 During the time period covered by our audit, one person was responsible for reviewing the registration forms and assessing the proposed home schooling programs and progress reports. During the two years we audited, between 800 and 950 children were registered for home schooling.
- 2.22 We selected a sample of 120 children from all areas of the province and at all grade levels to determine if the children were properly registered for home schooling and whether their study programs were appropriately assessed by the Department.
- 2.23 From our examination of the files, we found 102 of the proposed programs did not include details on program objectives and what the child was expected to learn. Five of the files did not include any information on the study program. Many of the program plans were simply a list of the courses and books that would be used by the child. It is unclear how the Department could know what the learning objectives are for these children based on the information it obtained.

***Recommendation 2.4***

***The Department of Education should assess the programs proposed by parents to determine if they are designed to achieve appropriate learning objectives and outcomes for home schooled children.***

***Department of Education Response:***

*As materials are developed as described in the preceding sections, submitted plans from parents will be assessed with a view to determining the degree of congruence with the appropriate educational standards.*

***Recommendation 2.5***

***The Department of Education should document its assessment of proposed home schooling programs in its files, through use of a checklist or other suitable form.***

***Department of Education Response:***

*The DOE will develop such a list based on the materials developed in 2.1-2.3.*

- 2.24 *Assessing children's progress* – The Department's ability to adequately assess home schooled children's educational progress is limited because it has not established clear and measurable learning objectives and outcomes for those children and many of the program plans do not identify objectives and expected learning outcomes. We used the files we selected for our sample to determine whether the Department attempted to monitor and assess the children's educational progress.





- 2.25 We examined 91 progress reports that were available and found all but one contained only the parent's opinion of the child's progress. In most cases, parents provided no evidence to support the assessment in the report. Many of the progress reports focused on the child's day-to-day activities and what they liked doing, rather than what they were supposed to be learning. There were only four instances in which the parents submitted examples of the child's work as evidence of progress.
- 2.26 The following are examples of the type of information provided.
- The progress report did not include specific information on what the child had learned; it only contained information on what the child liked to learn about.
  - The progress report was written for all three children who were being home schooled. The report did not break down each child's progress, or which subjects were covered and how each child was assessed.
  - The progress report stated the child was having difficulty reading. The Department did not follow up on this report.
  - The registration form indicated the child would be following a program at the grade four level but the progress report indicated the child had difficulties and instead completed work at the grade two level. This report was received during our audit and was referred to staff for follow up.
- 2.27 We found no evidence that the Department had concerns with any of the progress reports or followed up with the parents to obtain more information on what the child had accomplished.
- 2.28 If the Department does not adequately review and assess the progress of home schooled children, it is unlikely that those who are not making reasonable educational progress will be identified and provided support as required. The Education Act recognizes the importance to society of educating Nova Scotia's children. The home schooling program is poorly designed and lacks necessary information for the Department to know whether these children are being suitably educated. It appears that this level of oversight would be unacceptable in the public school system and we believe it should be unacceptable in the home schooling program as well. The ability of children to reach their future potential could be negatively impacted if they are not provided with the essential skills that a suitable education can provide.

***Recommendation 2.6***

***The Department of Education should obtain information on learning outcomes of home schooled children to determine if they are making reasonable educational progress.***

***Department of Education Response:***

*The DOE will do so based on the materials developed in 2.1-2.3.*

***Recommendation 2.7***

***The Department of Education should document in its files its assessment of the learning outcomes of home schooled children. Any action taken as a result of the assessment should also be documented.***

***Department of Education Response:***

*The DOE will do so based on the materials developed in 2.1-2.3. Consideration of the most effective mechanisms to fulfill this recommendation will be part of the longer-term strategy.*

## Registration and Reporting Processes

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### Conclusions and summary of observations

The Department does not have an adequate system to ensure home schooled children are properly registered and progress reports are submitted. We recommended the Department use its computerized database to track receipt of registration forms and progress reports. There are also significant gaps in the Department's processes to track children transferring between home schooling and public school to ensure they are properly registered. We recommended the Department verify the transfer of children between home schooling and public school.

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- 2.29 *Registration process* – Parents who choose to home school their children are required to register for home schooling with the Department each year. Staff enter registration information into a computerized database and file the registration form. From our testing of 120 files, we found 116 children had a current registration form on file. The registration form for one child was not obtained. For the remaining three files, the children ultimately were not enrolled in a home schooling program. We found in 30 cases, the submission of the registration form was not timely. One registration form was submitted a year late. We also found the Department's follow up of late registrations was not always timely.
- 2.30 *Submission of progress reports* – Parents are required to submit a report on their child's educational progress for the year. The Department uses its computerized database to record when a progress report is received. The Department will not process a registration form for a child if the previous year's progress report has not been submitted. When the Department receives a registration form for the current year but no progress report for the previous year, staff put the form aside. The Department sends follow-up letters to the parents requesting that the progress report be submitted.
- 2.31 *Manual tracking process* – The Department does not have an adequate system to ensure that registration forms and progress reports are submitted. Staff use a manual process to track whether children registered in the prior year are registered for the



current year and progress reports are received. Although staff record registration and progress report information in the database, the system is not used to generate a list of children from the prior year who are not yet registered for the current year or for whom progress reports have not been received. Instead, staff review approximately 900 files to determine if there is a current registration form and set aside those files for which one has not been received. Staff also note if a progress report has not been submitted. The Department sends follow-up letters to the parents requesting that the registration form and progress report be submitted.

- 2.32 We believe this process is inefficient and increases the possibility that staff could miss a file for which a registration form or progress report was not submitted. The Department would not be aware that follow up is needed. The Department has limited ability to enforce submission of registration forms and progress reports, relying mainly on letters, email and direct contact with the parents. The Department's ability may be further limited if the methods it uses to determine when follow up is needed are inefficient and unreliable. The Department has a database to record information on registration and progress reports which could be used to more effectively track whether the necessary forms and reports are received.

***Recommendation 2.8***

***The Department of Education should track home school registration using its computerized database to determine which children are not registered for the current year and whether follow up is needed.***

***Department of Education Response:***

*Short-term actions will be initiated within the next three to six months, and will include developing a system to track key data on home-schooled students such as registrations, receipt of progress reports, and transition of students between the public system and home-schooling.*

***Recommendation 2.9***

***The Department of Education should track receipt of progress reports using the computerized database to determine which children progress reports have not been received and whether follow up is needed.***

***Department of Education Response:***

*The DOE accepts this recommendation , see 2.8.*

- 2.33 *Transfers between home schooling and public school* – There are significant gaps in the Department's processes to track children transferring between home schooling and public school to ensure they are properly registered for school.
- 2.34 When home schooled children are not registered in the following year, the Department does not adequately follow up to determine whether these children were enrolled in public school or continued with home schooling. Two months after the academic

year begins, the Department sends follow-up letters to parents who had previously registered their children for home schooling, and then attempts telephone contact to find out where the children are attending school. If the Department cannot get a response from a parent, the file is marked as inactive and no further contact is attempted. If a parent informs home schooling staff that their child will be attending public school the following year, staff note this in the file and mark the file as inactive.

- 2.35 The Department's Statistics and Data Management Division maintains a database that contains information on all students registered in the public school system. Home schooling staff do not regularly verify with the Division that all children no longer registered for home schooling are enrolled in the public school system for the following year.

***Recommendation 2.10***

***The Department of Education should verify whether children no longer registered for home schooling are registered in the public school system.***

***Department of Education Response:***

*The DOE accepts this recommendation, see 2.8.*

- 2.36 Schools are not required to notify the Department's home schooling staff if parents indicate they are going to home school their child. Schools are also not required to follow up with staff to ensure that the child was registered for home schooling. The database maintained by the Statistics and Data Management Division captures information on public school students whose parents have indicated they are going to be home schooled. Home schooling staff do not obtain and use this information to track children who are transferring from public school to home schooling to ensure they are properly registered.

- 2.37 The Statistics and Data Management Division provided a list of 66 students registered for public school in 2010-11 who would be home schooled in 2011-12. We determined that 20 of the students registered for home schooling, 23 returned to public school, one went to private school, one graduated, and two moved from the province. 19 students were not registered for either public school or home schooling. These students may have left the province or may be 16 years or older and not required to be in school. It is also possible some of them are being home schooled but were not registered or are not being schooled at all.

***Recommendation 2.11***

***The Department of Education should track children leaving public school for home schooling to ensure they are properly registered for home schooling.***

***Department of Education Response:***

*The DOE accepts this recommendation, see 2.8.*



- 2.38 The Department does not know when a child moves in or out of the province unless the parents inform the Department or the school board. There may be school-aged children in the province who are not registered for any type of schooling. The Department cannot determine how many such children there may be. The Department also does not receive information on children who are registered in private schools and cannot track children who leave home schooling for private school.
- 2.39 Health records are one way that children of school age may be tracked and accounted for. The Department indicated this option is currently not available due to privacy issues. The Department also indicated it is in discussions with the Department of Health and Wellness to establish an information sharing protocol for certain students in another of the Department's programs. If such an avenue were available for home schooling, the Department could track all students in the province and determine whether they were registered for school.

***Recommendation 2.12***

***The Department of Education should explore the possibility of establishing an information sharing protocol with the Department of Health and Wellness to enable tracking of all school-aged children in the province to determine whether they are registered for school.***

***Department of Education Response:***

*The Department will immediately begin exploratory discussions with the Department of Health and Wellness about the possibility of developing an information-sharing protocol to enable tracking of all school aged children in the province.*



Department of Education: Additional Comments

The Department of Education recognizes it has a responsibility to ensure that all children receive a high-quality education, while also respecting the right of parents to make decisions about the most appropriate place for their children to obtain this education. To fulfill its responsibility in this regard, and in response to the concerns noted by the Auditor General with regard to children who are home schooled in Nova Scotia, the Department will move forward with a two-step strategy.