

**2021**

**Report of the Auditor General  
to the Nova Scotia  
House of Assembly**



**Planning and  
Implementation of the  
Pre-Primary Program**



**Performance Report**  
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July 7, 2021

Honourable Kevin Murphy  
Speaker  
House of Assembly  
Province of Nova Scotia

Dear Sir:

I have the honour to submit herewith my Report to the House of Assembly under Section 18(2) of the Auditor General Act, to be laid before the House in accordance with Section 18(4) of the Auditor General Act.

Respectfully,

A handwritten signature in blue ink that reads "Kim Adair-MacPherson".

**Kim Adair-MacPherson, FCPA, CA, ICD.D**

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## Chapter 1

# Department of Education and Early Childhood Development: Planning and Implementation of the Pre-Primary Program

### Overall Conclusions

- The audit found the initial implementation of the Pre-Primary Program was not adequately planned.
- We did note the time frame for planning was only five months.
- Program enhancements were evident during the province-wide rollout.
- Department focus is needed to ensure program effectiveness and that it benefits four-year-old Nova Scotians.

### Why We Did This Audit

- Access to high-quality early learning programs is important to Nova Scotians.
- The program is a significant investment.
- Proper planning is essential for a new program with significant social impacts and financial investments.

## Planning and Implementation of the Pre-Primary Program

- Government announced the program in April 2017 with the initial phase to be implemented in September 2017, leaving the Department of Education and Early Childhood Development with a short time frame to properly plan for an entirely new program.
- The Department did not analyze the full implementation costs of the program.
- The Department prepared a risk assessment, but there is no formal process to continuously monitor risks.
- Consultation with families and the childcare industry happened after the first year of implementation began.
- The Department has not established specific and measurable goals to evaluate the program's effectiveness.
- Regional Centres for Education do not ensure Pre-Primary staff have completed required background checks or provided proof of qualifications before working in the classroom.
- New Pre-Primary staff are not consistently provided orientation before working in the classroom.
- Pre-Primary staff in the Department and at the Regional Centres for Education feel roles and responsibilities are unclear.



## Recommendations at a Glance

### **Recommendation 1.1**

The Department of Education and Early Childhood Development should have a process in place to monitor risks on an ongoing basis.

### **Recommendation 1.2**

The Department of Education and Early Childhood Development should establish specific and measurable goals for the Pre-Primary Program and identify and collect the necessary data required to measure against them.

### **Recommendation 1.3**

The Department of Education and Early Childhood Development should regularly evaluate the program to determine whether goals and objectives are being met.

### **Recommendation 1.4**

The Department of Education and Early Childhood Development should ensure all background checks for Pre-Primary Program staff are completed as required by policy before staff begin working in the classroom.

### **Recommendation 1.5**

The Department of Education and Early Childhood Development should complete and implement their new provincial policy around background checks.

### **Recommendation 1.6**

The Department of Education and Early Childhood Development should ensure Early Childhood Educator's education credentials are verified when they are hired.

### **Recommendation 1.7**

The Department of Education and Early Childhood Development should develop a process to ensure all new Pre-Primary Program staff receive orientation prior to starting in the classroom.

### **Recommendation 1.8**

The Department of Education and Early Childhood Development should clearly define and communicate roles and responsibilities related to the Pre-Primary Program for the Pre-Primary Consultant, Pre-Primary Managers, school principals, and Early Childhood Educators.

### **Recommendation 1.9**

The Department of Education and Early Childhood Development should develop and implement a formal complaint process for the Pre-Primary Program that includes clearly defined and communicated roles and responsibilities.



# 1 Planning and Implementation of the Pre-Primary Program

## Introduction

- 1.1 The Pre-Primary Program was announced by Government in April 2017 to provide free, universal education for children who are four years old. Government rolled this program out over four years. Our audit covered planning and the first three years of implementation. Department management indicated they consider the program fully implemented as of the 2020-21 school year.
- 1.2 The Department of Education and Early Childhood Development is responsible for the program, which started in September 2017. The following are enrollment figures for the Pre-Primary Program in the first four years of the program.

	Year 1 2017/18	Year 2 2018/19	Year 3 2019/20	Year 4 2020/21
Number of school communities offering Pre-Primary	46	145	205	252
Estimated eligible 4 year olds	1,350	4,151	5,731	8,302
Number of students enrolled	891	3,158	4,618	6,196
Percentage of eligible students enrolled	66%	76%	81%	75%

Source: Department of Education and Early Childhood Development (unaudited)

- 1.3 Domestic and international research supports the benefits of early childhood programs such as the Pre-Primary Program. Several jurisdictions across Canada offer some form of a pre-primary program however, very few offer province-wide universal programming to all four year olds. Research shows that universal programs generally have positive impacts on children's language, literacy, and mathematic skills.
- 1.4 Our audit examined the planning and implementation of the Pre-Primary Program at the Department of Education and Early Childhood Development and at three Regional Centres for Education – Chignecto-Central, Halifax, and South Shore. We also selected a sample of three schools within each of the three Regional Centres for Education as areas to focus our work.



### Inadequate planning completed prior to implementation

- 1.5 When a new program is announced by government, we would expect to see certain things done before implementation. These include:
- identifying program goals and providing a measure of success



- identifying potential risks to the program as well as mitigation strategies
- analyzing the full implementation costs of the program
- consulting with appropriate stakeholders
- ensuring roles and responsibilities of key parties are clear

1.6 We found that the planning for the initial rollout of the program was not adequate. However, the short amount of time between the announcement of the program and the initial implementation may have contributed to some of the issues described throughout this chapter.




The Department did not analyze the full implementation costs of the program

1.7 The Department was not involved in determining the \$50 million committed by the Government to fund the Pre-Primary Program once fully implemented. The Department did not complete a detailed analysis of what the program would cost. We expected to see detailed information supporting the operational and capital costs required for each school at the initial planning phase, but no such analysis was completed by the Department. Without comprehensive cost projections, the Department's ability to fully understand the financial implications of the program is reduced and its ability to plan effectively is diminished.

1.8 The Department has not determined the full cost of the Pre-Primary Program. Management indicated that funding for Pre-Primary to the Regional Centres for Education and Conseil scolaire acadien provincial totaled \$49 million in 2020-2021. The \$49 million, according to the Department, represents costs such as staffing, supplies, equipment and food for the classrooms. However, costs such as renovations to schools and busing for pre-primary students are instead included as costs to the overall school system. Based on this, it is likely the full cost of implementing and running the Pre-Primary Program is higher than the initial commitment of \$50 million.

1.9 It is important to note that the time frame and estimated costs required to implement the program were established prior to significant planning activities. Government gave the Department the budget and timeline five months before the first classrooms opened in Nova Scotia, leaving little time to properly plan for the implementation of a new program. The task to implement the project was ultimately led by the Department and they should have been consulted about the appropriateness of the four-year implementation time frame, and the \$50 million budget.



 The Department completed a risk assessment but did not establish a process to re-assess and monitor risks


- 1.10 The Department of Education and Early Childhood Development completed a risk assessment for the Pre-Primary Program which identified the program risks as well as strategies to manage those risks. Some of the risks identified included impacts on childcare providers, availability of trained Early Childhood Educators, and additional responsibility for principals. The risk assessment was completed in July 2017, which is two months before the first Pre-Primary classes started. In order for it to be effective, a risk assessment should take place well in advance of the implementation of a large-scale program. The lead time will ensure effective response and mitigation strategies can be developed and, where possible, acted upon before implementation.
- 1.11 Although some identified risks had management strategies in place, there is no defined process to regularly track and monitor risks. Monitoring and reassessing risks is important for multi-phase projects like the implementation of the Pre-Primary Program. For example, developing a risk register to log and track potential project risks would allow the Department to regularly revisit risks as the program rolls out. The absence of a risk register could result in losing track of risks, not identifying new risks, and not addressing identified risks properly or in a timely manner.

### **Recommendation 1.1**

The Department of Education and Early Childhood Development should have a process in place to monitor risks on an ongoing basis.

*Department of Education and Early Childhood Development Response: Agree. As acknowledged by the Office of the Auditor General, EECD completed a risk assessment for pre-primary which identified program risks as well as strategies to manage these risks.*

*EECD agrees that a risk assessment process is required and will be conducted annually in the Fall/Winter.*

 The Department consulted with families and licensed childcare operators but not until after implementation began

- 1.12 Consultation is important in the planning stage of a new program because it can help a department ensure it has identified the potential impacts on key stakeholders. In September 2017, after the program was up and running in the first round of schools, the Department consulted with families with young children to better understand their needs and licensed childcare providers to better understand the effects on their sector.



- 1.13 The consultations identified several concerns about the program's impact on licensed childcare providers, including retention of staff because their Early Childhood Educators may leave to work in the school setting. To address staffing issues, the Department worked with the Nova Scotia Community College to expand the Early Childhood Education Diploma Program by adding new seats and providing financial supports for students. While this is a positive step to improve the supply of Early Childhood Educators in the workforce, evaluating the impacts of the initiative will take time because it generally takes two years for a student to complete the diploma program. If the consultations and actions taken were completed well in advance of program implementation, the additional students would be closer to graduation and able to join the workforce sooner.
- 1.14 While the consultations helped inform some positive changes, identifying these concerns in advance of implementation would have allowed licensed childcare providers time to prepare for potential impacts and provide more time for the Department to identify strategies to support the industry.



The Department has established program goals, but there is no strategy to measure the success of the program

- 1.15 The Department structured the Pre-Primary Program with program goals; however, these goals are not specific and there were no measures to evaluate success. Specific and measurable goals are important to determine if a new program is achieving its intended outcome and to identify how it can be improved.
- 1.16 For example, one of the goals is to *“Establish a strong foundation for learning so as to improve children’s outcomes for success in school and life.”* This is a broad goal that we feel could be interpreted in many ways. There are no further details on how to measure children’s outcomes for success. Without specific goals, it is difficult to determine whether they have been achieved.
- 1.17 Department staff told us there are no standard learning outcomes to evaluate the children in the Pre-Primary Program that are similar to the ones used in Grades Primary to 12 of the public school system. This makes it difficult to measure the effectiveness of the Pre-Primary Program. The learning approach in the Pre-Primary classroom is an unstructured play-based approach with no evaluations or tests. Specific and measurable program goals are very important, and management needs to do a thorough analysis of how they can be established without compromising the current set up of the classroom environment.
- 1.18 One option, a tool called the Early Development Instrument (EDI), is currently used to measure child development patterns in Grade Primary students. The Department used the scoring results from this instrument to help justify the



need for the Pre-Primary Program. This instrument should be considered to see whether it could be used to help assess whether the program is meeting its goals and working as intended.

#### What is the Early Development Instrument (EDI)?

- A research tool used in Nova Scotia to measure developmental health trends and changes in populations of children at the age of five.
- Questionnaires are completed by Grade Primary teachers for each student and include 104 questions across five categories.
- The five categories include physical health and well-being, social competence, emotional maturity, language and cognitive development, and communication skills and general knowledge.
- In Nova Scotia the EDI was completed in 2013, 2015, 2018 and 2020.

- 1.19 Children are considered vulnerable if they score in the lowest 10 per cent in one of the five EDI categories. The results in 2013 and 2015 indicated that one in four (25%) children in the province were vulnerable in one or more of the five EDI categories. In 2018, the percentage of children vulnerable increased to 28.8% and then decreased in 2020 to 25.5%.
- 1.20 The Department noted that they have completed four cycles of Early Development Instrument results (every three years). Therefore, using this tool to evaluate the Pre-Primary Program would require more time, but it could provide a summary picture of whether the children entering primary were in a better position after the program. It would also allow the Department to identify particular areas where children may be struggling within the five categories identified in the box above. One limitation of the Early Development Instrument is that the year in which a child attends Pre-Primary is only one year of a child's growth and development from age one to five. There are many factors in a child's life before they attend Pre-Primary that are beyond the Department's reach. However, we still feel this tool could be one part of a larger approach to measure the program's impact.
- 1.21 Although the Department does not have specific and measurable goals for the Pre-Primary Program, there was an early years evaluation project already in progress that was adapted to include the Pre-Primary Program. That project began in 2013 and was a collaboration with the Margaret and Wallace McCain Foundation to establish eight Early Years Centres across the province. The Early Years Centres deliver three core services, including an early learning program for four year olds which was used as the model for the Pre-Primary Program. The project included funding for an evaluation team from local universities to monitor and evaluate the programs annually over a five-year period. The evaluation was adjusted to include the Pre-Primary Program in years four and five.



- 1.22 The evaluations included surveys, site visits, focus groups, interviews, and program participation data. The scope of the evaluation included: to what extent the organization structure supported the implementation of the Pre-Primary Program; if the Pre-Primary Program was implemented as intended; and to what extent the Pre-Primary Program reached young children and families. While this was useful information to guide the ongoing implementation of the Pre-Primary Program, it did not present tangible and concrete evidence to support the achievement of program goals as the goals set up by the Department were not measurable in the first place.
- 1.23 It is noteworthy that the evaluation done by the McCain Foundation for 2017 (in year three of five) suggested the Early Development Instrument had the potential to measure the effectiveness of the Early Years' models.

### **Recommendation 1.2**

The Department of Education and Early Childhood Development should establish specific and measurable goals for the Pre-Primary Program and identify and collect the necessary data required to measure against them.

*Department of Education and Early Childhood Development Response: Agree. EECD has program goals for pre-primary such as:*

- establishing a strong foundation for learning to improve children's outcomes,*
- providing a high quality, play-based learning environment grounded in pedagogically-sound curriculum, and*
- providing support services to children and families that are necessary to support their transition, to name a few.*

*EECD will consult with experts in the field of early childhood education in early 2022 and establish measures and data collection methods that are appropriate to measuring success and quality in early learning environments. The methods will be developed and introduced by December 31, 2022. Traditional assessment tools such as report cards and standardized tests would not be appropriate for early learning settings. The learning goals in Nova Scotia's Early Learning Curriculum Framework provide a structure for early learning practice, guide educators' reflections and critical thinking, and form the basis for the assessment of children's learning and holistic development.*

### **Recommendation 1.3**

The Department of Education and Early Childhood Development should regularly evaluate the program to determine whether goals and objectives are being met.



*Department of Education and Early Childhood Development Response: Agree. During the implementation of pre-primary, EECD purposefully focused on a developmental evaluation to inform the implementation and understand barriers to participation and integration in the public-school setting.*

*EECD will conduct an impact/outcomes evaluation of pre-primary which focuses on how the program is meeting its goals and objectives and achieving desired outcomes, based on a revised Theory of Change model and evaluation framework which will include a schedule for on-going evaluation of pre-primary.*

*EECD will complete the evaluation in 2022-23 school year which will provide a baseline measurement for outcomes.*

➡ Schools were prioritized for implementation based on greatest need, high likelihood of success

1.24 We found the Department established a reasonable process to prioritize the program rollout based on need and established it in schools with the greatest need first. The Department's process considered aspects such as the results of the Early Development Instrument, childcare availability in the local area, and availability of space within schools.

➡ The curriculum framework used in the Pre-Primary Program was developed using research and consultation

1.25 The Nova Scotia Early Learning Curriculum Framework is used in the Pre-Primary Program and other early learning programs across Nova Scotia. The curriculum framework was developed by the Department in 2018 in response to priorities identified in Government's 2016 action plan for early learning and childcare, *Affordable, Quality Child Care: A Great Place to Grow!* The curriculum framework was developed using research and through consultations with external groups in the early childhood sector as well as various levels of Department staff. It was the subject of a pilot project in licensed childcare centres and two Early Years Centres. An evaluation of the pilot was conducted by the Department prior to the framework being fully implemented in the Pre-Primary Program in 2018.

1.26 The Department has also created a guide to assist Early Childhood Educators with implementing the curriculum framework. Both the Department and Regional Centres for Education provide Early Childhood Educators with training on the curriculum framework.





Employee background checks not always completed before staff begin working in the classroom

- 1.27 The Regional Centres for Education we audited are not ensuring all required background checks are obtained before staff begin working in the classroom with the Pre-Primary Program. The hiring process requires that staff offered positions must provide completed criminal record checks, vulnerable sector checks and child abuse registry checks but not always before they begin working in the classroom. Failing to ensure these are complete is a potential risk that is within the government's control. For staff working with young children, these checks are especially important to ensure the learning environment is safe.
- 1.28 From our sample of nine schools in the three Regional Centres for Education we audited, we requested proof of background checks for twelve staff members, including nine Early Childhood Educators and three Pre-Primary Program Managers. We found that background checks were sometimes not provided at all or were provided after the individual started working in the classroom.
- 1.29 Each of the Regional Centres for Education requires police background checks, including criminal record and vulnerable sector checks, to be completed before working in the classroom. For one employee, we found no evidence of a completed vulnerable sector check on file. We also found that one employee provided their completed vulnerable sector check 46 days after their hiring date and for another, there was no documentation of the date received.
- 1.30 We found one employee who started working in January 2020 who did not have a Child Abuse Register check completed when we initially requested it. Human Resources staff at the Regional Centre for Education later provided us with a completed check in January 2021, leaving a whole year without a completed check on file. All other completed background checks we examined passed with no issues identified.
- 1.31 At Chignecto-Central and South Shore Regional Education Centres, we found inconsistencies in the policies around certain background checks. What was required in practice did not match what was stated in their policies.
- 1.32 We were told that the Department is currently developing a provincial policy for Regional Centres for Education to address these inconsistencies, which it plans to implement in 2021. We encourage the Department to proceed with implementing the new policy to ensure Regional Centres for Education have a consistent approach to employee background checks and to ensure there are no gaps in the policy that would compromise the safety of children.





#### **Recommendation 1.4**

The Department of Education and Early Childhood Development should ensure all background checks for Pre-Primary Program staff are completed as required by policy before staff begin working in the classroom.

*Department of Education and Early Childhood Development Response: Agree. EECD has directed the Regional Centres for Education/Conseil scolaire acadien provincial to immediately ensure all pre-primary staff have the required checks in place and that these checks are properly documented in personnel files, and to report to the Deputy Minister with confirmation that the work has been undertaken no later than May 15, 2021. All Regional Centres for Education and Conseil scolaire acadien provincial have replied and are in compliance.*

*On an annual basis, Regional Centres for Education/Conseil scolaire acadien provincial will be required to provide the Deputy Minister with an attestation which assures that all policies have been adhered to and that all staff in pre-primary have the required background checks in place and on file.*

#### **Recommendation 1.5**

The Department of Education and Early Childhood Development should complete and implement their new provincial policy around background checks.

*Department of Education and Early Childhood Development Response: Agree. EECD developed a Student Protection Policy which comes into effect on June 1, 2021 which applies to all Regional Centres for Education and Conseil scolaire acadien provincial staff. The policy includes standards for pre-employment checks, a new provision for annual self-declarations, and a requirement for regular background checks for existing employees.*



Employee qualifications not always confirmed before staff are hired

- 1.33 All pre-primary classroom staff are Early Childhood Educators, and each is classified by the Department as level 1, 2 or 3. Classification levels are determined based on the education and/or work experience of the Early Childhood Educator. The Regional Centres for Education determine which classification level is required for their positions.
- 1.34 Job descriptions for Early Childhood Educators indicate the required education and classification level for the position. There was incomplete documentation for half (six of 12) of the Early Childhood Educators we tested and there was no proof of education for two of these employees.
- 1.35 It is important to verify employee educational qualifications to ensure the program is delivered by qualified staff and in order to deliver a quality program.



**Recommendation 1.6**

The Department Education and Early Childhood Development should ensure Early Childhood Educator’s education credentials are verified when they are hired.

*Department of Education and Early Childhood Development Response: Agree. EECD has directed the Regional Centres for Education/Conseil scolaire acadien provincial to immediately ensure confirmation of educational qualifications for pre-primary staff are documented in their personnel file, and to report to the Deputy Minister with confirmation that the work has been undertaken no later than by May 15, 2021. All Regional Centres for Education and Conseil scolaire acadien provincial have replied and are in compliance.*

 Inconsistent processes for staff orientation

- 1.36 In the first year the Pre-Primary Program was implemented, none of the Regional Centres for Education held orientation for their new Pre-Primary staff. This is an example of what can happen when there is not enough time to properly plan the execution of a new program.
- 1.37 Currently, orientation is only provided to Pre-Primary staff who begin working in the program at the start of the year. The three Regional Centres for Education we audited do not provide a full orientation to new Pre-Primary staff who start in their position after the school year has begun. Orientation of new staff is important in order to communicate clear expectations and ensure they understand their roles and responsibilities. This is particularly important for a new program because of the greater uncertainty, and the importance of establishing a solid foundation to build upon as the program rolls out.

**Recommendation 1.7**

The Department of Education and Early Childhood Development should develop a process to ensure all new Pre-Primary Program staff receive orientation prior to starting in the classroom.

*Department of Education and Early Childhood Development Response: Agree. Regional Centres for Education/Conseil scolaire acadien provincial will be required to provide the Deputy Minister with an annual attestation which assures that all new staff in pre-primary have received an orientation prior to working with children in pre-primary by October 31st of each year starting in 2021.*

 Roles and responsibilities unclear among Pre-Primary staff

- 1.38 We interviewed staff from all levels of the program and heard concerns from many of them about a lack of clarity around the roles and responsibilities in the Pre-Primary Program. It is important that roles and responsibilities for



a new program are clearly defined and communicated to everyone involved. Failing to do so can create confusion and frustration among staff, parents and guardians, and can result in a less efficient program rollout.

- 1.39 One particular area of concern raised in our audit involved the role of the school principal. The Pre-Primary Program is delivered in a school setting but is not part of the public school system under the *Education Act*. As a result, the program has a different governance structure than Grades Primary to 12 within the school. For example, the school principal normally oversees educational programming in their school. However, Pre-Primary Program Managers are responsible for this aspect of the program for some or all schools in their Regional Centre for Education. They therefore could not reasonably be expected to oversee these aspects on-site at each school every day.
- 1.40 In schools with a Pre-Primary Program, some principals are taking on differing levels of responsibility which can lead to negative impacts on morale and uncertainty for all involved over roles and responsibilities. These unique circumstances, combined with the novelty of the program, illustrate why it is important to ensure roles and responsibilities are clearly stated.
- 1.41 We also found that the role of the Pre-Primary Consultant was not clear among staff. Pre-Primary Consultants are employed by the Department with one consultant per Regional Centre for Education and two for Halifax Regional Centre for Education. Staff we interviewed told us there is confusion between the role of the Pre-Primary Consultants and Pre-Primary Managers because of overlapping responsibilities. For example, both roles are required to conduct site visits, coach and support Early Childhood Educators, as well as organize professional development.

### **Recommendation 1.8**


The Department of Education and Early Childhood Development should clearly define and communicate roles and responsibilities related to the Pre-Primary Program for the Pre-Primary Consultant, Pre-Primary Managers, school principals, and Early Childhood Educators.

*Department of Education and Early Childhood Development Response: Agree. EECD will support Regional Centres for Education/Conseil scolaire acadien provincial HR Directors to collaborate on province-wide definition of roles and responsibilities for all positions in pre-primary by December 31, 2021. The roles and responsibilities will form part of the orientation for all new employees in pre-primary.*

*EECD has completed a process for defining the role and responsibilities of the EECD Pre-primary Consultant position which has been presented and shared with*



*the Pre-primary Consultants and Regional Centres for Education/Conseil scolaire acadien provincial. Supporting documentation has been disseminated.*

 Communication to the public and families happens on a regular basis

1.42 An important part of managing the expectations for a new province-wide program is effective communication. The Department developed a detailed communication plan, along with various communication pieces, to facilitate the rollout of the program for the public and families considering enrolling their children.

1.43 For example, the Department published information on its website including frequently asked questions and issued media releases for important announcements such as new locations. We did note that announcements of some new sites were as late as two months before the school year started but on average, the Department announced new locations for the program approximately six months prior to the start of school.

1.44 We found that Regional Centres for Education are communicating key issues with the public and families on a regular basis. The approach to communicating with families involved in the program is different at each Regional Centre for Education. Generally, direct communication happens through the Early Childhood Educator or Pre-Primary Manager through emails, telephone calls, in-person interactions and newsletters. The Regional Centres for Education also communicate with the public through their websites. For example, publications from the Regional Executive Director's office sometimes include details about the Pre-Primary Program. There are also news releases to announce new locations and registration information.

 No documented process to address and resolve complaints

1.45 Neither the Department nor the Regional Centres for Education have established a documented complaint process. We were told that typically, Early Childhood Educators working in the classroom are the first point of contact for families to ask questions or voice concerns. More serious issues are escalated to the Pre-Primary Manager if required, but there is nothing that clearly documents the process to a parent or guardian. As noted above, since the role of the principal is also not clear, parents could potentially bring their concerns to school leadership.

1.46 Without a documented and communicated complaint process it could be challenging for a parent or guardian if their complaint involves the Early Childhood Educator in the classroom. Without a defined process, a complainant may not know how else to address their concern. A documented complaint process would provide clarity to staff and families and ensure issues are appropriately raised and resolved.



**Recommendation 1.9**

The Department of Education and Early Childhood Development should develop and implement a formal complaint process for the Pre-Primary Program that includes clearly defined and communicated roles and responsibilities.

*Department of Education and Early Childhood Development Response: Agree. Regional Centres for Education and Conseil scolaire acadien provincial have formal parent complaint policies and protocols. EECD will work with the Regional Centres for Education/Conseil scolaire acadien provincial to revise these where necessary to ensure that pre-primary is explicitly included by September 1, 2021.*



The Department reviewed lessons learned and adjusted their implementation plan accordingly

1.47 During the first three years of the program's rollout, we found that the Department reviewed lessons learned each year and adjusted the program accordingly. For example, in the first years, there were issues raised over access to transportation and before-and-after school care. In November 2018, the Department introduced a pilot before-and-after school program, and in August 2019, introduced busing services for children attending the Pre-Primary Program.



## Appendix I

### Reasonable Assurance Engagement Description and Conclusions

In March 2021, we completed an independent assurance report of the planning and implementation of the Pre-Primary Program at the Department of Education and Early Childhood Development. The purpose of this performance audit was to determine whether the Department of Education and Early Childhood Development adequately planned the implementation of the Pre-Primary Program and whether they are regularly assessing its effectiveness.

It is our role to independently express a conclusion about whether the planning and implementation of the Pre-Primary Program complies in all significant respects with the applicable criteria. Management at the Department of Education and Early Childhood Development has acknowledged its responsibility for the planning and implementation of the Pre-Primary Program.

This audit was performed to a reasonable level of assurance in accordance with the Canadian Standard on Assurance Engagements (CSAE) 3001—Direct Engagements set out by the Chartered Professional Accountants of Canada; and sections 18 and 21 of the Auditor General Act.

We apply the Canadian Standard on Quality Control 1 and, accordingly, maintain 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 conducting the audit work, we have complied with the independence and other ethical requirements of the Code of Professional Conduct of Chartered Professional Accountants of Nova Scotia as well as those outlined in Nova Scotia's Code of Conduct for public servants.

The objectives and criteria used in the audit are below:

**Objective:**

To determine if the implementation of the Pre-Primary Program was adequately planned by the Department of Education and Early Childhood Development.

**Criteria:**

1. The Department of Education and Early Childhood Development should have adequate support for the need for the Pre-Primary Program.
2. The Department of Education and Early Childhood Development should have completed an initial risk assessment for the Pre-Primary Program prior to implementation.
3. The Department of Education and Early Childhood Development should have analysis that showed the projected costs of implementing the Pre-Primary Program prior to implementation.
4. The Department of Education and Early Childhood Development should have analysis to support the curriculum framework chosen for the Pre-Primary Program.



5. The Department of Education and Early Childhood Development should have defined and measurable goals for the Pre-Primary Program.
6. The Department of Education and Early Childhood Development should have consulted with appropriate stakeholders before implementation of the Pre-Primary Program.
7. The Department of Education and Early Childhood Development should have ensured there were defined roles and responsibilities in place before implementing the Pre-Primary Program.
8. The Department of Education and Early Childhood Development should ensure Pre-Primary Program staff have consistent and appropriate qualifications and training.
9. The Department of Education and Early Childhood Development should have a process in place to prioritize which schools to implement the Pre-Primary Program in each year.

**Objective:**

To determine whether the Department of Education and Early Childhood Development have utilized lessons learned from each year of the rollout of the Pre-Primary Program.

**Criteria:**

1. The Department of Education and Early Childhood Development should have a process to regularly re-evaluate and adjust their implementation plan.
2. The Department of Education and Early Childhood Development should have a process in place to regularly evaluate if the Pre-Primary Program is meeting its goals.
3. The Department of Education and Early Childhood Development should be communicating regularly with relevant stakeholders.

Generally accepted criteria consistent with the objectives of the audit did not exist. Audit criteria were developed specifically for this engagement. Criteria were accepted as appropriate by senior management at the Department of Education and Early Childhood Development.

Our audit approach consisted of interviews with management and staff of the Department of Education and Early Childhood Development, reviewing policy, examining processes for planning and implementation of the Pre-Primary Program and detailed file review. We examined relevant processes, plans, reports and other supporting documentation. Our audit period covered April 1, 2016 to June 30, 2020. We examined documentation outside of that period as necessary.

We obtained sufficient and appropriate audit evidence on which to base our conclusions on March 5, 2021, in Halifax, Nova Scotia.

Based on the reasonable assurance procedures performed and evidence obtained we have formed the following conclusions:



- We found that overall, the planning for the initial rollout of the Pre-Primary Program was not adequate; some of the issues we identified may be due to the amount of time between the announcement of the program and implementation.
- During rollout of the program, the Department of Education and Early Childhood Development incorporated the results of program evaluations and lessons learned. However, the Department does not have specific and measurable goals to determine whether the program is working as intended.



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