Indian and Northern Affairs Canada Corporate Services

Prepared by:

Departmental Audit and Evaluation Branch

Assisted by:

Performance Management Network

Audit of Teacher Certification

Project 01/19 October 2003

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Purpose

The objective of this engagement was to provide senior management with a comprehensive assessment of the management and operational practices established to monitor education standards in funding agreements. Specifically, the audit engagement determined whether the education provided to First Nations students is given by qualified teachers and that the curriculum program is comparable to that provided by the provinces.

Background

Indian and Northern Affairs Canada (INAC) provides funding to Band Councils or other First Nations education authorities to support instructional services for Status Indians on reserve. In the context of First Nations education, funding arrangements specify that Band Councils are responsible for ensuring that their education standards enable students to transfer within the school system of the province "without academic disadvantage". In order to provide assurance to this, band-operated school principals are to provide reports set out in the First Nations National Reporting Guide that attest to their teaching qualifications as well as certifying that the curriculum used meets provincial or territorial education standards.

Assurance

We concluded that the procedures currently in place are inadequate to assure that education provided to First Nations students is given by qualified teachers and that the curriculum is comparable to that provided provincially. As a result, assurance cannot be given that education standards set out in funding agreements are being met.

In some regions there are compensating provincial procedures which, despite deficiencies in departmental procedures and management control framework, provide a high degree of assurance that teachers are certified and curriculum is comparable. In addition, regions considered other factors such as parental and community support as greater risk areas to not meeting the educational standard than the deficiencies relating to teacher and curriculum certification.

In accordance with Treasury Board proposed revisions to Internal Audit Reporting, a statement of assurance is included in this report.

Key Findings

The management control framework for ensuring education standards are met was found to be lacking in terms of clear roles and direction. In particular there was no direction from headquarters to the regions with regards to what is acceptable evidence in support of a principal certifying to teacher qualifications. There was also no direction from headquarters regarding what makes up "comparable" curriculum.

The national reporting form for teacher and curriculum certification (TPMS 0023) is not designed in a manner that would facilitate non-compliance situations to be identified for further action. Furthermore, the form is not designed to allow the principal to certify teachers or curriculum independently from one another.

It was also observed that school evaluations were not being conducted in some locations. School evaluations represent an important independent source for providing certification of curriculum comparability to provincial standards.

Headquarters has identified that a list of teachers and their qualifications would be relevant information required for decision making and has added such to the First Nations National Reporting Guide. Although some regions have started collecting the teacher information, the full relevant information required for teacher and curriculum certification has not been explicitly analysed so as to allow collection procedures and resource implications to be established.

Recommendations

It is recommended that the Director General, Community Development Branch, in consultation with regions and First Nations Partners, develop and issue guidance regarding the certification of teachers and curriculum, including:

- the objective of the annual teacher and curriculum certifications;
- the headquarters and regional roles in the process;
- what determines "qualification" of teachers and "comparable" curriculum including possible reliance on additional factors such as school evaluations and provincial certification of schools;
- the use of risk management methodologies in the management and delivery of the education program;
- revise the annual certification of teachers and curriculum form to allow the principal to depict other than 100% certification situations and that a list of teachers be a mandatory attachment;

- develop school evaluation guidelines that include an assessment of teacher qualification and curriculum comparability so the evaluations can be a source for the annual teacher and curriculum certifications; and
- determine if relevant information required for decision making on teacher and curriculum certification needs to be expanded to include details such as:
 - total number of teachers as well as number of teachers certified, pending or not certified; and
 - school evaluation related information including date of last evaluation, whether curriculum was evaluated against provincial standards, and the general conclusions of curriculum comparability if conducted.

We have completed the internal audit of teacher certification. The objective of this engagement was to provide Senior Management with a comprehensive assessment of the management and operational practices established to monitor education standards in funding agreements. Specifically, the audit engagement determined whether the education provided to First Nations students is given by qualified teachers and that the curriculum program is comparable to that provided by the provinces.

The internal audit was conducted in accordance with the Treasury Board Policy on Internal Audit and the Institute of Internal Auditors' Standards for the Professional Practice of Internal Auditing.

The audit examined the management control framework, policies, procedures and monitoring and reporting practices relating to the teacher and curriculum certification and other practices for ensuring education standards are met.

The examination was conducted during the period of December 2002 to March 2003 and covered activities that have occurred during the period fiscal year 2002-2003.

The scope of the audit included headquarters and all regions except Northwest Territories, Nunavut and Yukon and excluded site visits to federal and band-operated schools as adequate information was considered to be available at regional offices to assess the audit criteria established.

The criteria used were:

- the management control framework for monitoring education standards should ensure there are clear objectives, roles and direction, and adequate monitoring of departmental requirements;
- principals should provide the annual "Certification of Teachers and Curriculum" on a timely basis;
- school evaluations should be incorporated into the determination of "compatibility" of curriculum;
- relevant information should be available on the number of teachers that are either qualified, have their qualification in progress, or not qualified;
- relevant information on the "compatibility" of curriculum should be available;
- appropriate information should be gathered and used for decision-making and reporting; and

• risk related to lack of monitoring of education standards should be explicitly understood and managed.

The criteria were discussed and agreed with the Acting Director of the Learning, Employment and Human Development Directorate, Human Resources Branch prior to the conduct of detailed audit procedures.

We concluded that the procedures currently in place are inadequate to assure that education being provided to First Nations students is given by qualified teachers and that the curriculum is comparable to that provided provincially. As a result, assurance cannot be given that education standards set out in funding agreements are being met.

In some regions there are compensating provincial procedures which, despite deficiencies in departmental procedures and management control framework, provide a high degree of assurance that teachers are certified and curriculum is comparable. In addition, regions considered other factors such as parental and community support as greater risk areas to not meeting the educational standard than the deficiencies relating to teacher and curriculum certification.

In our professional judgment, sufficient and appropriate audit procedures were conducted and evidence gathered to support the accuracy of the conclusions reached and contained in this report. The conclusions were based on a comparison of the situations as they existed at the time of the audit engagement against the audit criteria. The conclusions are only applicable for the management and operational practices. The evidence gathered meets professional audit standards and is sufficient to provide senior management with the proof of the conclusions derived from the internal audit.

Departmental Audit and Evaluation Branch Indian and Northern Affairs Canada Indian and Northern Affairs Canada (INAC) provides funding to Band Councils or other First Nations education authorities to support instructional services for Status Indians on reserve.

The *Indian Act* sets out the Minister's powers to arrange for the education of Indian children. The program has evolved over time as a result of government policy and is operated under the broad authorities provided through the *Department of Indian Affairs and Northern Development Act*.

Since 1991-1992, the enrolment of First Nations children in elementary and secondary schools has increased from 96,594 to more than 120,000 in 2000-2001. There are approximately 494 schools on reserve, all but seven are under First Nations management.

In 1998, as part of Gathering Strength-Canada's Aboriginal Action Plan the Education Reform Initiative was launched by the department. Education Reform resources are used to improve the quality of education and academic achievement in First Nations schools.

The Chiefs' Committee on Education of the Assembly of First Nations and INAC have identified the following four priorities for nationally-allocated resources under the Education Reform Initiative:

- strengthen management and governance capacity;
- improve the quality of classroom instruction;
- increase parental and community involvement in education; and
- aid the school-to-work transition for First Nations youth.

In addition, one of the eight current priorities of the department is to provide First Nations with tools to improve the quality of education, from early childhood development to access to the workforce, and to demonstrate results of expenditures.

With regards to funding provisions for elementary/secondary education services to eligible students and in accordance with the funding agreements, the Band Councils are to provide reports dealing with teacher certification and provincial curriculum as set out in the First Nations National Reporting Guide.

Accordingly, principals in schools administered by First Nations, are requested to prepare and submit an annual report giving the names of teachers and attesting to their teaching qualifications as well as certifying that the curriculum used meets provincial or territorial education standards.

In the context of First Nations education, funding arrangements specify that Band Councils are responsible for ensuring that their education standards enable students to transfer within the school system of the province "without academic disadvantage". An effective management control framework is important to ensure that First Nations are delivering programs in accordance with the delivery standards outlined in funding arrangements. Accordingly, the department uses assertions of principals, quinquennials First Nations managed education evaluations and annual overall compliance reviews by Funding Officers as a means to monitor implementation of education to this specific standard.

The objective of this audit was to provide senior management with a comprehensive assessment of certification of teacher and curriculum monitoring practices as a basis for determining the adequacy of practices in place to monitor education standards set out in funding agreements.

The audit covered a review of the management control framework, policies, procedures, practices and administrative regimes relating to the teacher certification and curriculum program established in accordance with the department and provincial educational guidelines at headquarters and at all regions of the department covering the current fiscal year 2002-2003.

The following issues were assessed through the audit:

- whether the department had an adequate level of assurance that teachers hired in bandoperated schools were duly certified;
- whether the department had adequate assurance that the curriculum used in the school was comparable to the necessary basic requirements of the provincial/territorial department of education;
- whether there were adequate management control frameworks in place at headquarters and the regions to ensure that teacher certification requirements were being met in compliance with the departmental directives;
- the information collected and used by the department was accurate, relevant, properly managed and accessible for decision-making purposes;
- the identification and control of risks identified by managers of the teachers certification of the education program and the extent to which risks were mitigated; and
- whether there were adequate operational systems in place for regional monitoring of band-operated schools and delivery of education services by certified teachers.

The audit team visited all regions with the exception of the Northwest Territories, Nunavut and Yukon, as the education administration for these regions is the responsibility of the respective territorial government.

To facilitate the development of the audit plan the following information was requested from the regions that were to be visited:

- the names of the regional persons involved (e.g. corporate services/data base, funding services/follow up and intergovernmental/education supervision areas) and the office in which they are located;
- documents or process drafts of how the procedures for teacher certification and curriculum assessment are carried out;
- the location in the region where school evaluation and principal certification files are held;
- list of First Nations in the region with schools;
- schedule of school evaluations for each of the schools and their current status;
- list of the schools which have completed the "Annual Certification of Teachers and Curriculum" for 2002-2003;
- list of the schools that have provided backup to the principal's certification in the form of a teacher list and/or copies of individual teachers licences;
- list of the schools that have not provided backup to the principal's certification; and
- list of the schools that have been certified by the province (if done by the province).

Based upon discussions at headquarters and a visit to the Ontario Region in the planning phase, the following audit criteria were established:

- the management control framework for monitoring education standards should ensure there are clear objectives, roles and direction, and adequate monitoring of departmental requirements;
- principals should provide the "Annual Certification of Teachers and Curriculum" on a timely basis;
- school evaluations should be incorporated into the determination of "compatibility" of curriculum;

- relevant information should be available on the number of teachers that are either qualified, have their qualification in progress, or not qualified;
- relevant information on the "compatibility" of curriculum should be available;
- appropriate information should be gathered and used for decision-making and reporting; and
- risk related to lack of monitoring of education standards should be explicitly understood and managed.

Detailed testing was conducted on a sample of 20% of band-operated schools from each region that was representative of the population in terms of size and geographic location. If the school had been provincially certified, a copy of the certification document was requested. For schools that were not provincially certified, a copy of the principal certification along with supporting documentation and the most recent evaluation was requested.

The detailed testing phase of this audit explored each of the audit issues utilizing the information which had been provided by the regions in response to the requests for information. Regional visits were conducted during which the appropriate staff were interviewed and the relevant files were reviewed.

Management Control Framework

The management control framework for monitoring of education standards was examined in terms of clarity of objectives, roles and direction, and the adequacy of monitoring of departmental requirements.

The objective at hand is the need to monitor whether education standards in funding agreements are being met. In some regions this was clearly understood regarding certification. In other regions there was little understanding as to the objective of the annual certification of teachers and curriculum form and the recording of compliance into the Transfer Payment Management System (TPMS). This lack of understanding has resulted in data not being input into TPMS and has negatively impacted on the importance of teacher certification and curriculum comparability in the minds of regional staff. In addition, there was little understanding that school evaluations could also support the monitoring of education standards. This lack of understanding of objectives resulted in inconsistent and incomplete implementation practices.

It was noted that regions understood that monitoring of teacher qualifications and comparability of curriculum was within their realm of responsibility. In discussion with education program staff at headquarters it was agreed that it was a headquarters' responsibility to provide clear guidance on program procedures and the management control framework. Education Program staff at headquarters acknowledged that teacher and curriculum certification was an area that required attention in terms of clear direction on procedures and reporting.

As an example, it was also noted that there was no direction from headquarters to the regions with regards to what is acceptable evidence in support of a principal "certifying" teacher qualifications. Documentation provided by principals in support of their signing certification form TPMS 0023 would often include a range of various types of documents. Some evidence included copies of current year annual provincial teaching license cards. Other evidence would be a teaching certificate from the 1970's. In other cases principals listed academic degrees as B. ED or M.A. Without direction on what is "required support", a principal's certification may not meet the funding agreement requirement of not placing students at academic disadvantage when transferring to a provincial school.

Similarly, school evaluations represent an excellent method to monitor the comparability of First Nations school curriculum to that of the province. However, there is likewise little direction from headquarters regarding what makes up appropriate "comparable" curriculum nor is there a national evaluation guideline that requires evaluations to compare a First Nations school's curriculum with provincial curriculum.

Principal Certification of Teachers and Curriculum

The First Nations National Reporting Guide requires a form (TPMS 0023) to be completed with the signature of the principal of a band-operated school. Annual completion of the form by principals varies within the regions from 100% compliance to minimal.

The value of the form is questioned as it does not provide the principal the opportunity to present a qualified certification with explanation. Regional staff are aware that geographical, teacher shortage or cultural requirements create situations where there are teachers without provincial certification within schools, yet the principal is required to sign the declaration that "all teachers" possess certificates. The National Reporting Guide does not give any guidance on how to report exceptions. A form collected within one region clearly exemplifies this issue as the principal of the school signed the form but with a foot note stating "I don't think I can sign this."

A further problem with the TPMS 0023 form was the requirement for the principal to sign-off on both the qualification of teachers and the comparability of curriculum with the same signature. This 'dual purpose' signature puts in doubt further the legitimacy of the principal's signature as there were instances where the principal signed-off on the form but the corresponding evaluation indicated that curriculum was not yet comparable to provincial standards.

In some cases, assurance that the education standard will be met is assured because the province has assumed responsibility for the review and acceptance of both curriculum and teacher's qualifications. In other regions, a large percentage of the band-operated schools have been provincially certified as recognized private schools. As such, teacher qualification and comparable curriculum are checked by provincial education authorities.

The requirement to attach a list of teachers and their certification level to the principal's certification has been met with a mixed degree of compliance. One region has interpreted the reporting guide requirement which states "A list of teachers and certification level should be attached separately"¹ as optional, based on the utilization of the word "should" and has decided not to obtain this information. The use of the term "should", allows the band or the region to provide or collect teacher information at their discretion and explains the variance in compliance.

School Evaluations

The First Nations Reporting Guide establishes the requirement for an evaluation of each bandoperated school to be completed once every five years. Due to funding constraints the regions have not maintained the required number of evaluations and in the case of one region there have been no evaluations conducted during the last five years.

¹Source: *First Nations National Reporting Guide 2002-2003*, Volume 1, Tab E, pg. 6

The majority of evaluations were conducted by experienced educational professionals and they were primarily intended to meet the needs of the school. While some regions have provided direction and procedural guidance there is no national direction on what should be included in an evaluation.

A review of the evaluations which were available for schools selected in the sample revealed that the majority included no assessment of curriculum comparability to the provincial curriculum.

Accurate and Relevant Information

Headquarters has identified that a list of teachers and their qualifications would be relevant information required for decision making and has added such to the First Nations National Reporting Guide. Although some regions have started collecting relevant teacher information (i.e., total number of teachers as well as number of teachers certified, pending or not certified) the full relevant information required for teacher and curriculum certification has not been explicitly analysed so as to allow collection procedures and resource implications to be established.

In terms of curriculum, we noted that there were no relevant information requirements determined. In addition, there was no guidance on using school evaluations as relevant information for decision making (i.e., date of last evaluation, whether curriculum was evaluated against provincial standards, and the general conclusions of curriculum comparability if conducted).

Risk

Having qualified teachers and curriculum meeting provincial or territorial educational standards was clearly recognized by regions and headquarters as a risk area that requires greater attention. However, regions considered other factors such as parental and community support as the most significant risk areas to not meeting the educational standard.

The department's Integrated Management of Risk (IMoR) initiative is designed to assist headquarters and regional groups analyse the level of risk in their operations and activities. As the action plan for IMoR is implemented over the next two years, the education program at headquarters and in the regions should look to integrate the IMoR Risk Management Methodologies into their program as a basis for self-assessing the adequacy of their procedures and management control framework.

- 1. It is recommended that the Director General, Community Development Branch, in consultation with regions and First Nations Partners, develop and issue guidance regarding the certification of teachers and curriculum, including:
 - the objective of the annual teacher and curriculum certifications;
 - the headquarters and regional roles in the process;
 - what determines "qualification" of teachers and "comparable" curriculum including possible reliance on additional factors such as school evaluations and provincial certification of schools; and
 - the use of risk management methodologies in the management and delivery of the education program.
- 2. It is recommended that the Director General, Community Development Branch, in consultation with regions and First Nations Partners, revise the annual certification of teachers and curriculum form to allow the principal to depict other than 100% certification situations and that a list of teachers be a mandatory attachment.
- 3. It is recommended that the Director General, Community Development Branch, in consultation with regions and First Nations Partners, develop school evaluation guidelines that include an assessment of teacher qualification and curriculum comparability so the evaluations can be a source for the annual teacher and curriculum certifications.
- 4. It is recommended that the Director General, Community Development Branch, in consultation with regions and First Nations Partners, determine if relevant information required for decision making on teacher and curriculum certification needs to be expanded to include details such as:
 - total number of teachers as well as number of teachers certified, pending or not certified; and
 - school evaluation related information including date of last evaluation, whether curriculum was evaluated against provincial standards, and the general conclusions of curriculum comparability if conducted.

Terms of Reference

Audit of Teacher Certification

Background: The Department of Indian Affairs and Northern Development (DIAND) provides funding to Band Councils or other First Nations education authorities to support instructional services for status Indians residing on reserve.

The *Indian Act* enables the Minister's powers to arrange for the education of Indian children. The program has evolved over time as a result of government policy and is operated under the broad authorities provided through the *Department of Indian Affairs and Northern Development Act*.

Since 1991-1992, the enrolment of First Nations children in elementary and secondary schools has increased from 96,594 to more than 120,000 in 2000-2001. There are presently 494 schools on reserve, all but 7 are under First Nations management.

In 1998, as part of *Gathering Strength-Canada's Aboriginal Action Plan* the Education Reform initiative was launched by the department. Education Reform resources are used to improve the quality of education and academic achievement in First Nations schools.

The Chiefs' Committee on Education of the Assembly of First Nations and DIAND has identified four priorities for nationally-allocated resources under the Education reform initiative:

- strengthen management and governance capacity;
- improve the quality of classroom instruction;
- increase parental and community involvement in education; and
- aid the school-to-work transition for First Nations youth.

In addition, one of the eight current priorities of the department is to provide First Nations with tools to improve the quality of education, from early childhood development to access to the workforce, and to demonstrate results for expenditures. This could also entail new or modified legislative and/or institutional elements.

With regards to funding provision of elementary/secondary education services to eligible students and in accordance with the funding agreements the Band Councils are to provide the reports dealing with Teacher Certification and provincial curriculum as set out in the First Nations National Reporting Guide. Accordingly, school principals, in schools administered by First Nations must make an annual report giving the names of teachers and attesting to their teaching qualifications, as well as certifying that the curriculum used meets provincial or territorial educational standards.

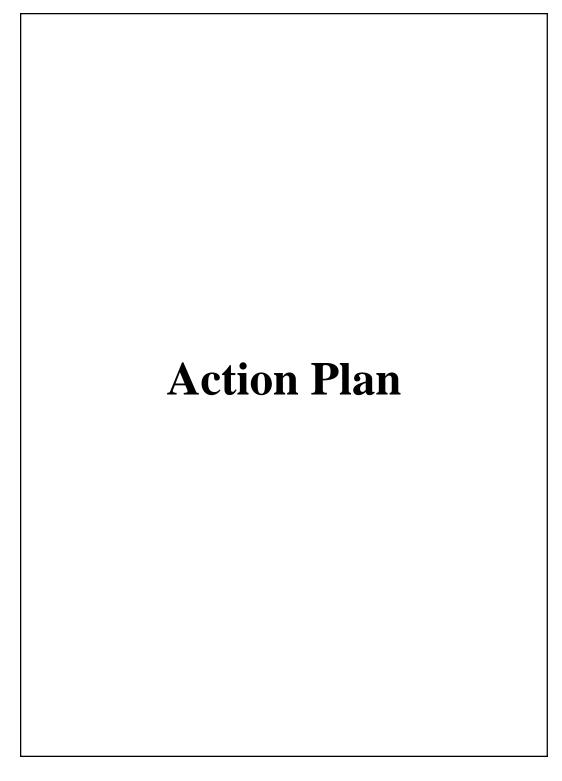
- **Objectives:** The objective of the audit is to provide assurance to senior management with a comprehensive assessment of the Teacher Certification and Curriculum Program and to assess whether that the education provided to First Nations students is given by qualified teachers and that the Curriculum Program is comparable to that provided by the provinces.
- Scope: The audit will cover a review of management control framework, policies procedures, practices and administrative regimes relating to the Teacher Certification and Curriculum Program established in accordance with the departmental and provincial educational guidelines at headquarters and all regions of the department covering the current school year 2001-2002.

Issues: The audit will assess:

- whether the department has an adequate level of assurance that the teachers hired in band-operated school are duly certified;
- whether the department has adequate assurance that the curriculum used in the school is comparable to the necessary basic requirements of the provincial/territorial department of education;
- whether there are adequate management control frameworks in place at headquarters and the regions to ensure that Teacher Certification requirements is being met in compliance with the departmental directives;
- the information collected and used by the department is accurate, relevant, properly managed and accessible for decision-making purposes;
- the identification and control of the risks identified by the managers for the Teachers' Certification of the education program and the extent to which the risks are mitigated; and
- whether there are adequate operational systems in place for regional monitoring of band operated schools and delivery of educations services by certified teachers.

Approach:	The audit of the Teacher Certification and Curriculum Program will be conducted in three phases of the audit, i.e., preliminary survey phase, fieldwork and analysis phase and reporting phase of the audit.
Resources and time frame:	The audit will be performed by the Departmental Audit and Evaluation Branch (DAEB) staff and the professional auditing consultants. The audit will commence in May 2002 and will be completed by November 2002.
Cost:	The estimated cost for this audit would be \$ 105,000.
Approved by:	

Chantal Bernier Assistant Deputy Minister Socio-Economic Policy and Programming September 5, 2002



Action Plan

Project Title:Audit of Teacher CertificationRegion or Sector:Socio-Economic Policy and Programs

Responsible Planned **Recommendations** Actions Manager Implementation (Title) Date November 30, 2003 It is recommended that the Director Learning, Employment and Human Development Director General, 1. General, Community Development Branch, Directorate will involve First Nations through AFN Community in consultation with regions and First representation; representatives from some **Development Branch** Nations Partners, develop and issue provincial departments of education; CIMD; and (Note: Work to be guidance regarding the certification of representatives from the regional education offices completed in teachers and curriculum, including: to address these questions. A meeting with INAC November 2003 for regional education officers is scheduled for the implementation in the week of August 4, 2003. 2004-2005 school vear). the objective of the annual teacher and The objective will be developed in line with the November 30, 2003 curriculum certifications; work done for the Elementary/Secondary Education Program Interim Authorities. the headquarters and regional roles in Complementary and supportive roles will be November 30, 2003 the process; defined. what determines "qualification" of This area will require extensive discussions with November 30, 2003 teachers and "comparable" curriculum First Nations and it may be advisable to engage the including possible reliance on provincial departments of education. additional factors such as school evaluations and provincial certification of schools; and the use of risk management November 30, 2003 methodologies in the management and delivery of the education program.

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Action Plan

Project Title:Audit of Teacher CertificationRegion or Sector:Socio-Economic Policy and Programs

Responsible Planned **Recommendations** Actions Manager Implementation (Title) Date 2. It is recommended that the Director Learning, Employment and Human Development Director General, November 30, 2003 General, Community Development Branch, Directorate (LEHD) to work with Corporate Community in consultation with regions and First Information Management Directorate (CIMD) to **Development Branch** Nations Partners, revise the annual review the forms in consultations with First (Note: Work to be certification of teachers and curriculum Nations, Regional Management Organizations and completed in form to allow the principal to depict other Regional Offices. Work to take place in November 2003 for than 100% certification situations and that a September 2003. implementation in the 2004-2005 school list of teachers be a mandatory attachment. year). 3. It is recommended that the Director Director General. March 31, 2004 To develop comprehensive school evaluation guidelines that include an assessment of the range General, Community Development Branch, Community in consultation with regions and First of teaching competencies/qualification and **Development Branch** Nations Partners, develop school evaluation curriculum comparability that will be addressed in (Note: Work to be guidelines that include an assessment of the elementary/secondary program evaluation completed by teacher qualification and curriculum scheduled to be completed in December 2003. March 2004, for comparability so the evaluations can be a implementation in the source for the annual teacher and curriculum (Note: Teacher certification and curriculum 2005-2006 school certifications. comparability would be addressed in the action year). listed in item #2).

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Action Plan

Project Title:Audit of Teacher CertificationRegion or Sector:Socio-Economic Policy and Programs

Responsible Planned **Recommendations** Actions Manager Implementation (Title) Date 4. It is recommended that the Director The relevant information required for decision Director General, November 30, 2003 General, Community Development Branch, making on teacher and curriculum certification Community in consultation with regions and First needs to be expanded to include more information. **Development Branch** Nations Partners, determine if relevant (Note: Work to be information required for decision making on completed in teacher and curriculum certification needs to November 2003 for be expanded to include details such as: implementation in the 2004-2005 school vear). total number of teachers as well as ٠ November 30, 2003 number of teachers certified, pending or Learning, Employment and Human Development Directorate (LEHD) to work with Corporate not certified; Information Management Directorate (CIMD) to review the forms in consultations with First Nations, Regional Management Organizations and Regional Offices. Work to take place in September 2003. school evaluation related information ٠ including date of last evaluation, To develop comprehensive school evaluation March 31, 2004 whether curriculum was evaluated guidelines that include an assessment of the range against provincial standards, and the of teaching competencies/qualification and curriculum comparability that will be addressed in general conclusions of curriculum comparability if conducted. the elementary/secondary program evaluation scheduled to be completed in December 2003. (Note: Teacher certification and curriculum comparability would be addressed in the action listed in item #2).

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