



Learner Digital Files

FIELD CONSULTATION

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Executive Summary

In 2017, AlphaPlus was asked by a sector membership group for information on options for digital literacy and basic skills (LBS) learner files and cloud-based storage. The sector members identified a primary driver for the investigation as the burden of physically storing more than seven years of learner files. Space in multi-service facilities and school boards is in high demand, and file storage space allocated to LBS service providers can be significantly constrained, causing operational tensions and issues.

An online survey was selected as the means of collecting information from the LBS service providers. The objective was to identify what items and documentation were actually in the learner files and why.

It became immediately clear in the early discussions with a range of LBS service providers that the business process related to learner case-management documentation was inconsistent and unpredictable. A 2017 consultation with service providers found that none of the service providers felt that the Ministry of Training, Colleges and Universities (MTCU) required contents — otherwise, data in a learner’s files would be consistent from one service provider to the next. And from their experiences within their own programs, the expectations arbitrarily changed from one year to the next.

Before any systemic and equitable approach to any format (e.g. paper-based or digital) of learner case-management documentation improvement could be investigated, the details of the business process needed to be fully understood and standardized.

This investigation and report is only an initial foundational step in any future modernization initiative that would eventually involve multiple drivers, diverse stakeholders and change management with the intention of getting all parties involved to agree on a common or standard way of formatting learner case-management documentation. This applies to all formats (e.g. paper-based or digital) because programs will have different drivers dictating how they gather, capture and store learner files. Modernizing case-management documentation

does not imply that it is relevant to only digital formats, and the recommendations made will support any format a program chooses.

As stakeholder engagement and consensus-building takes time, proposed models for thinking about how data is gathered, recorded, confirmed and stored have been provided as a starting point for the discussions.

Background Information

When asked to look at options for digital LBS learner files and cloud-based storage, AlphaPlus understood the issue as one of digitizing an existing and well-tested business process, namely learner case-management documentation. Learner case-management documentation is only one part of a wider set of business processes in place at all LBS service providers, but it is the only one with a direct impact on file storage capacity. The learner case-management business process includes the MTCU Employment Ontario Information System – Case Management System (EOIS-CAMS), a data system standardized by MTCU guidelines that is implemented at over 250 sites across Ontario. As an LBS support organization with a provincial mandate, AlphaPlus’s approach is to look at the issue and solution options from a systemic perspective (consistent and standardized) rather than by the needs of individual (or subsets of) service providers. AlphaPlus is interested in the challenge from the perspective of all cultural streams and delivery sectors, and AlphaPlus has no intention that digital learner files become mandatory, nor does AlphaPlus suggest it is the best or feasible solution for all providers. Several LBS service providers were interested in exploring with AlphaPlus possible solutions to the paper-file storage challenge, and while the investigation into possible solutions encompasses all streams, for those service providers interested in exploring or moving forward with digital learner files, they will need to look at their own processes and drivers and weigh any solution against their own requirements.

A first step in developing a solution (be that paper-based, online and/or database-driven) to any business challenge is to fully understand, document and model the business process and related business requirements. The mandatory requirements related to the LBS learner files can be examined in three areas:

- MTCU contracts, guidelines and processes expectations
- Other external compliance
- Internal or organizational compliance

Early in discussions with a range of LBS service providers, it became clear that the business process related to learner case-management documentation was inconsistent and unpredictable. Service providers consulted did not feel that the MTCU required contents — otherwise, data in a learner’s files would be consistent from one service provider to the next. And from their experiences within their own programs, the expectations seemed arbitrarily changed.

The service providers identified the lack of a transparent, consistent and accountable application of the LBS file review and monitoring process conducted by the LBS employment and training consultants (ETCs) as the cause of variable learner case-management documentation. AlphaPlus understands that the case management process and learner file documentation can legitimately vary greatly between service providers. The difference could be based on many factors and priorities such as:

- Specific organizational policies and practices related to:
 - Privacy and confidentiality
 - Legislative and legal compliance
 - Accountability and performance management
 - Information technology
- Specific organizational preferences or customs around things like:
 - Information management capacity
 - Process usability and design
 - Communications and reporting

Any approach to the format of learner case-management documentation improvement needed to start with a full understanding of the business process and a standard way to think about how and what info is gathered, how it is confirmed, how it is recorded and how the information is stored short term and long term.

Based on the information provided by the field during consultation, the primary barrier to systematically modernizing the learner case-management processes is the lack of a clear and effective process and standardized data modelling. With that in mind, the next step was to road map the learner case-documentation business process, while not constraining it to a single linear model (one size fits all), but to allow for flexibility, nuance and accommodation.

The AlphaPlus 2018-19 business plan included the creation of this report with clear, actionable next steps. The report is an investigation of business processes of learner case management and the standards and protocols required to support digital learner records. This investigation and report are only an initial foundational step in any future modernization initiative that would eventually involve multiple drivers, diverse stakeholders and change management.

Consultation

Description

Online consultation in the form of a survey was chosen as the means to collect information. The survey and communications tools were developed iteratively in consultation with key informants from each delivery sector. The key informants also provide insights into sector-specific challenges and issues. The primary objective of the survey as well as the sector-specific consultation was to identify what items and documentation were in the learner files and why. The examination reflected the LBS program design with questions about documentation related to:

1. Intake and assessment
2. Registration
3. Learner plans and evidence of progress
4. Exit and followup
5. Training supports

The survey distinguished between active or open files and those files deemed closed and stored for at least seven years. The survey also asked about issues with regard to the ETC file review and site monitoring process. An email including a link to the survey was sent to 394 LBS service provider staff.

Participation

The survey was completed from October 29 to November 26, 2018, with the following participation:

Group	# of Emails Sent	# of Survey Responses	Ratio
Anglophone school board	72	11	15%
Anglophone college	63	11	17%
Anglophone community-based	153	40	26%
Deaf and deafblind	25	7	28%
Francophone	35	19	54%
Indigenous	46	3	7%
Total	394	91	23%

Findings

Findings indicate that there is generally no consensus on what information is gathered in a learner file, how it is confirmed or recorded or how the information is stored. Service providers who were consulted felt that the MTCU required content — otherwise data in learner files would not be consistent from one service provider to the next. From their experience within their own programs, the expectations changed from one year to the next. Several themes did come out of the consultation and helped to inform key recommendations.

The full results from the online surveys can be found under Appendix 1.

Themes

Common or typical situations that came out of the consultation include but are not limited to the following.

1. Expectation and Transparency of Monitoring or Review

Some ETCs might come to the monitoring visits with a prepared MTCU checklist that organizations do not get to see in advance of the visit. Much of what is on the checklist is data entry details and making sure that what is in the learner files match what is in EOIS-CAMS. This administrative task takes up much of the time of the monitoring visit, and very little time is dedicated to discussion of the actual program. It would be very useful if the checklist could be presented to the organizations in advance of the program monitoring visit.

2. Complexity, Duplication and Risk of Errors

- a. Some ETCs might expect the dates of the intake assessments and the intake dates on EOIS-CAMS to match exactly, which is an issue for programs that do not have a dedicated staff person to do this daily data entry. Many organizations have part-time staff who can only do data entry the days they are working.
- b. Some ETC might expect that the participation agreement be completed by hand and can't be computer-generated.

3. Streamlining Data

For LBS organizations that offer such things as transportation tokens or bus tickets, it is extremely time-consuming that each token or ticket must be signed for on a daily basis. Some LBS organizations have tried to set up a monthly recording system versus daily or weekly. Some ETCs might or might not approve of a monthly recording system.

4. Monitoring Capacity

There is a very high turnover of ETCs, and this can present issues around the expectations and requirements for the learner files and the program monitoring visits. Also, with so many new ETCs, the monitoring visits can become more about data audits. More time in the past was spent during the monitoring visits discussing the strengths and issues the LBS programs were encountering. Managers can be forced to

spend a lot of time responding to the different expectations of the ETCs. Since ETCs might not have an adult education background, they can struggle to understand the LBS programs.

5. Single Paper-Based Learner File

- a. Some LBS organizations would prefer to scan the documents and store them electronically to reduce physical storage space. As of this point, this has not been accepted by MTCU because the ETCs expect paper files.
- b. Some LBS organizations have created in-house systems that suit their particular needs. For example, the colleges have multiple information management systems (IMSS) to which the college sector organizations must adhere. This can create duplication of file-keeping when the ETCs want something done differently than what is already being done in the college IMSS (e.g. Banner and Blackboard).
- c. Many students receive training supports through a direct deposit and their T4As are a yearly receipt. Students record their attendance online; final grades appear in the transcripts, so paper documentation for these items is not required. Some ETCs still require paper copies of the above, which seems to be a waste of paper and time.
- d. Some LBS organizations keep student work and tracking sheets in binders in the classrooms, but the ETCs would prefer the work and tracking sheets be kept in the learner files. This is a duplication of paper and time.
- e. LBS organizations that have human resources or finance departments usually have the Canada Revenue Agency (CRA) forms kept with them and not in the learner files.
- f. Some ETCs have objected that followup forms and exit forms are not kept in the learner files. Once followups are completed, the forms will then be put in the learner files.
- g. Some bills and receipts can't be kept in an individual learner's files because the LBS organization receives one bill that includes more than one student.

- h. Training support and proof of documentation, due to its highly private and confidential nature, is kept in a separate locked file system.
- i. Learner plan results for some ETCs are required on the learner plan as well as the student information system (SIS), which creates a duplication of time and paper.
- j. When data is kept in the learner files as well as in other areas, there is a great risk of copying errors and it is very time-consuming.
- k. Some students have requested that they keep their own successfully completed final assessments for their learning portfolios and that these assessments not be kept in the learner file after they have exited the program.

6. Predictable Standards Versus Preferences

Several ETCs have personal preferences versus MTCU expectations and standards. Here are a few examples where ETC expectations differ from MTCU expectations and standards:

- Requiring specific language on the intake assessment.
- Requiring a suitability checklist.
- Requiring every paper document to have a date and instructor initials.
- Requiring paper copies of everything versus scanned documents.
- Keeping samples of student work in the files.
- Seeing proof of work beyond the completed milestone tests. It is not always clear what proof is required because the ETC opinion on what is sufficient proof varies.
- Revising a learner plan more frequently than it currently is.
- Completing milestones in a set period.
- Requiring separate sheets containing the same information that is located on the intake and registration forms.
- Using legal versus letter file folders.

7. Purpose of the Learner File

- a. Learner files are meant as a tool for the organization to store MTCU mandatory documentation and are also meant for the learners. The feeling of many LBS organizations is that the learner files are more of a tool for the monitoring visit and for the ETC to audit and confirm that the documentation in the files matches what is in the EOIS-CAMS (such that all dates on paper copies are an exact match to that of the EOIS-CAMS system). Because the files are perceived primarily for the audit, there are times that the files are manipulated to meet the audit requirements when in fact there would be a better way of organizing the files for the everyday operation of the LBS organization.
- b. It would suit many organizations to be allowed the option to electronically scan the documentation versus everything being paper copies. Once a learner exits, for example, it would be much better to be allowed to scan and save the learners' documents for the seven or eight years required by MTCU.
- c. The files need to be useful on a daily basis versus being ready for the monitoring visit that happens every couple of years.

8. Range of Experiences

LBS organizations shared a wide range of experiences mentioned in the survey — some positive and some negative.

Positive

- Many ETCs have had very positive discussions with their LBS organizations regarding maintenance of records.
- If the LBS organizations had a solid rationale for a decision about documentation and the learner file, many ETCs were OK with the decision.
- Many ETCs are happy with the files and listen to the reasoning behind the documentation decisions.

- Many ETCs have made very useful suggestions for the learner files.
- Criticism has been minor and the changes have been manageable.

Negative

- The majority of negative comments stem around some of the ETCs' lack of experience in adult education, specifically LBS and OALCF and their focus on the monitoring visit as the sole purpose to audit the files rather than putting time and thought into useful dialogues with the organizations concerning program issues and successes.

Learner Case-Management Documentation Capacity

Two key issues emerge from the themes, both of which have significant impact on program capacity to manage case documentation and form the foundation for recommendations in the following sections.

Learner file requirements and data entry into EOIS-CAMS is what drives much of the documentation process, and the key issues relate directly to these mandated activities. They have been identified as:

1. The duplicative and non-value-added processes that are exacerbated by a lack of clear rules with consistent application. There needs to be capacity and support for a rigorous, unambiguous and formalized process from which database or digital records systems could be built.
2. The need for clear local data/information management practices.

Learner Case-Management Documentation Recommendations

The following recommendations assume that some work will need to be done between ETCs and programs and that the outcome will be a more efficient auditing process with time to focus on the program rather than the paperwork. As well, these recommendations, if actioned, will set the foundation for work that needs to be done to address storage issues and to help

programs adopt the use of digital artifacts for learner files if they choose. The implementation of this will take further investigation and stakeholder engagement.

Recommendations

1. LBS ETCs provide mandatory advance notice of case number and/or learner number for the paper-based inspection at the service provider's location.
2. Publish the up-to-date learner file review form (checklist) used by the ETC monitoring or data-integrity audit. Consider collaboratively reviewing the checklist to determine if the exercise has the capacity to produce valid information.
3. Consider collaboratively developing a list (i.e. description or definitions) of the decisions made by the LBS service provider that require a rationale as per section 5.6.1 of the MTCU's *Literacy and Basic Skills: Service Provider Program Guidelines*.
4. Update the EOIS-CAMS Literacy and Basic Skills Data Dictionary (January 2015) because it does not accurately reflect the live EOIS-CAMS. This is a clear barrier to the effective development of records, information and case-management systems and practices.
5. Contingent on implementation of #1, if a service provider has a documented policy or process in place for the collection, creation and validation of data by authorized staff and the completion of the process is recorded, and the data is recorded in the required MTCU systems (and in local systems), the original source documentation can be destroyed or optionally scanned or digitized.
6. In advance of the implementation of #1, or alternatively, if a service provider has a documented policy or process in place for the collection, creation and validation of data by authorized staff and the completion of the process is recorded, and the data is recorded in the required MTCU systems (and in local systems), the original source documentation can be destroyed or optionally scanned or digitized into electronic learner files after two years.
7. All data transfers (both to and from) the EOIS-CAMS and the database systems of service providers should be optional.

Model for Gathering, Confirming, Recording & Storing Information

While the recommendations that came out of consultation with the field focused on actions that would positively impact the learner file audit process, the question of how to support programs that wish to move to digital artifacts requires further work. Programs are hitting capacity for physical storage, and a solution is still required. The recommendations, if actioned, will help to standardize how information is gathered, confirmed and recorded, but wider consultation is needed to apply this standardization across the field.

The following tools have been developed to support this conversation. They provide a model or way of thinking and talking about the information.

Description

MTCU requirements and program considerations drive data collection, and the balance between different needs and expectations needs to be reasonable and efficient. The MTCU and LBS programs have some different considerations, but to be efficient and effective, there should be consistency in areas where that is possible.

1. MTCU considerations
 - a. EOIS-CAMS
 - b. Compliance in principle
 - c. ETC monitoring and review (e.g. file presentation, suitability checklists)
2. Service provider considerations
 - a. Data collection and confirmation, creation and validation
 - b. Information processing and data entry
 - i. EOIS-CAMS
 - ii. Internal system(s)
 - c. Working files (in process with educators)
 - d. Departmental data (e.g. human resources, finance)
 - e. Multiple locations

f. Management, storage and retrieval

Protocol or Model for Gathering, Confirming, Recording & Storing Required Information

To build consensus around data collection, it is important to have a way to describe the data and the activities around the data collected. The following model provides a way of thinking about the data that ensures stakeholders are thinking about the data the same way.

Title	Description
Category of information	To which LBS guideline, contract or EOIS-CAMS requirement is this information related (e.g. eligibility, date of birth)?
Confirmation activity	What is the LBS program or program staffing doing (e.g. administering a test, supporting the completion of a questionnaire, reviewing or validating documentation)?
Types of data	Need to understand the types of updates and changes that could happen with each piece of information and how the updates and changes are processed and documented
<ul style="list-style-type: none"> • Tombstone 	Not likely to change (e.g. date of birth)
<ul style="list-style-type: none"> • Current 	Could change (e.g. primary address)
<ul style="list-style-type: none"> • Current – Training plan-related 	Could change (e.g. goal, time commitment)
<ul style="list-style-type: none"> • Progressive – Training plan-related 	Cumulative information (e.g. milestone, followup)
<ul style="list-style-type: none"> • History – Service plan-related 	Recorded history (e.g. attendance, training support payments)
Data life cycle	Some documents are expected to be reviewed (reviewed, adjusted or revised) and updated (case management) at some frequency of intervals (e.g. regularly or frequently). What is the interval for updating this data or the forms or records into which this data is entered?

Title	Description
Organizational policy, procedure or process (documented where?)	What internal (in-house) documentation exists to describe how the activity should be completed (who, what, where, why and when)? Where can this documentation be found?
In-house tools used (samples where?)	What are the tools or templates (paper-based or online) used for this process (e.g. questionnaire or form)? Where can this template be found?
Documentation provided by client	What documents does the client provide to support this activity or use as a source of information?
Output documented in the local system(s)	What outputs from the activity are recorded in <u>which</u> local system?
Process documented in the local system(s)	What processes (who, when, etc.) are recorded in <u>which</u> local system (e.g. date learning styles assessment completed)?
Could documentation of the outputs and process be electronic?	Yes or no
Copy of in-house tool kept? Where?	As determined by the organizational policy. Are the copies of the tools (e.g. forms) used by the programs and client to create the information kept? Where can this documentation be found?
Could this in-house tool be electronic?	If kept, this could be: <ol style="list-style-type: none"> 1. Native data in an electronic information system (e.g. SIS). 2. An electronic document generated by another system stored in (uploaded to) an electronic information system (e.g. SIS). 3. An electronic document generated by another system stored in an electronic file system. 4. A scan of a paper-based tool stored in (uploaded to) an electronic information system (e.g. SIS). 5. A scan of a paper-based tool stored in an electronic file system.

Title	Description
Copy of client-provided documentation kept? Where?	<p>As determined by the organizational policy.</p> <p>Are the copies of the documents the client provided to support this activity or as a source of information kept?</p> <p>Where can this documentation be found?</p>
Could this client-provided documentation be electronic?	<p>If kept, this could be:</p> <ol style="list-style-type: none"> 1. An electronic document generated by another system stored in (uploaded to) an electronic information system (e.g. SIS). 2. An electronic document generated by another system stored in an electronic file system. 3. A scan of a paper-based tool stored in (uploaded to) an electronic information system (e.g. SIS). 4. A scan of a paper-based tool stored in in an electronic file system.
What is documented in EOIS-CAMS?	What information (data dictionary) is recorded in the EOIS-CAMS?
EOIS-CAMS input date and user recorded locally (how/where)?	As determined by the organizational policy.
Is the information part of a guideline criteria?	Monitor guideline revisions to ensure compliance, e.g. suitability checklist or report.
Impact of returning learner	<p>As determined by the organizational policy.</p> <p>How is the process altered in the case of a retuning learner, e.g. using earlier assessment?</p>
Are there decisions related to this information (which)?	?

Learner File Summary

The learner file summary has been developed as a starting point for stakeholder discussions to support consensus-building on what learner file information is gathered, how it is confirmed, how it is recorded and how the information is stored. This tool can also be used by individual

program and ETC monitors to ensure that they have a common understanding of what is expected for monitoring purposes.

The summary covers what LBS service providers must ensure is included in each learner file.

This includes:

1. Rationale for decisions made by LBS service providers.
2. A participant registration form.
3. A learner plan.
4. Evidence of learner progress.
5. Training support documentation.
6. An LBS program exit and followup form.

This summary does not assume that this is the exhaustive list of what is required or where standardization or even consensus is recommended; it is a discussion tool that can be added to or edited as required.

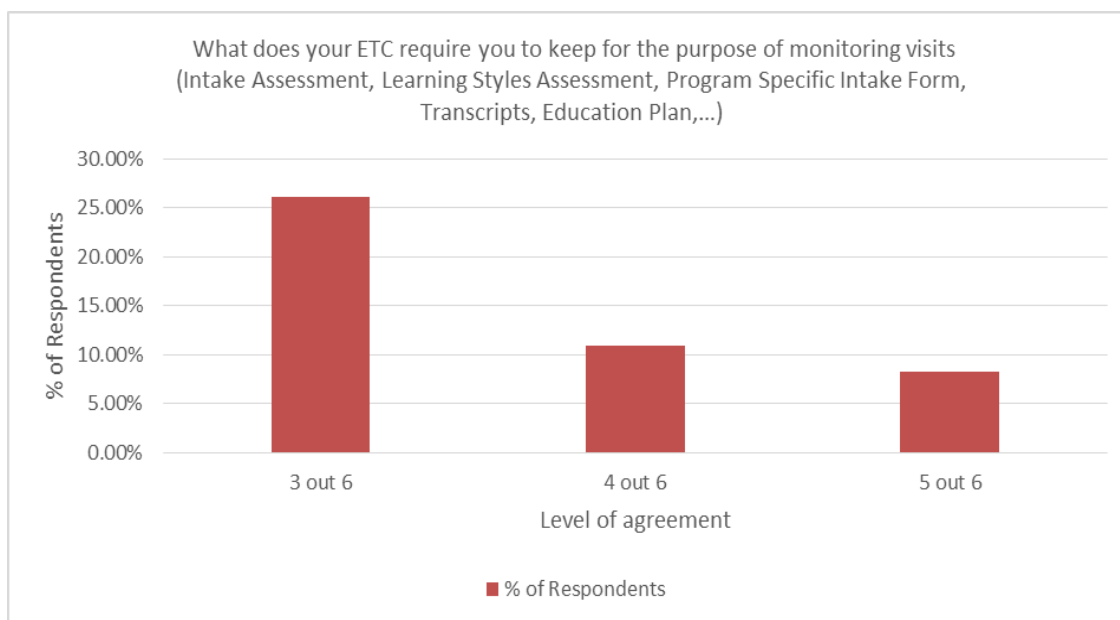
See Appendix II for the Learner File Summary tool.

APPENDIX I: Results of Data Analysis

Question 1

When the respondents were asked to select from the list of files their ETC required from them to keep for the purpose of monitoring visits, 30.14% of respondents selected 3 out of 6 files, 26.03% of respondents selected 4 out of 6 files, 10.96% of respondents selected 5 out of 6 files, and 8.22% of respondents selected all 6 files. The table and chart below represent these results by frequencies and percentages.

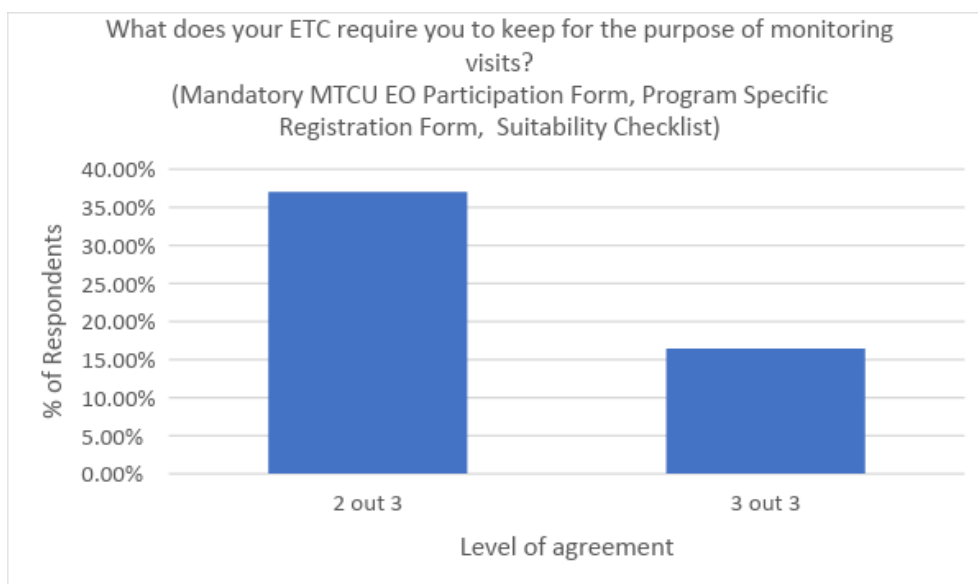
Q1: From your selection from the list on the previous page, what does your ETC require you to keep for the purpose of monitoring visits? A: Intake Assessment, Learning Styles Assessment, Program-Specific Intake Form, Transcripts, Education Plan, PLAR Information (6 options to choose)			
Level of Agreement %	Level of Agreement	# of Respondents	% of Respondents
50% of agreement	3 out of 6	22	30.14%
66.7% of agreement	4 out of 6	19	26.03%
83.3% of agreement	5 out of 6	8	10.96%
100% of agreement	6 out of 6	6	8.22%
Total		55	



Question 2

When the respondents were asked to select from the list of files their ETC required from them to keep for the purpose of monitoring visits, 36.99% of respondents selected 2 out of 3 files and 16.44% of respondents selected all 3 files. The table and chart below represent these results by frequencies and percentages.

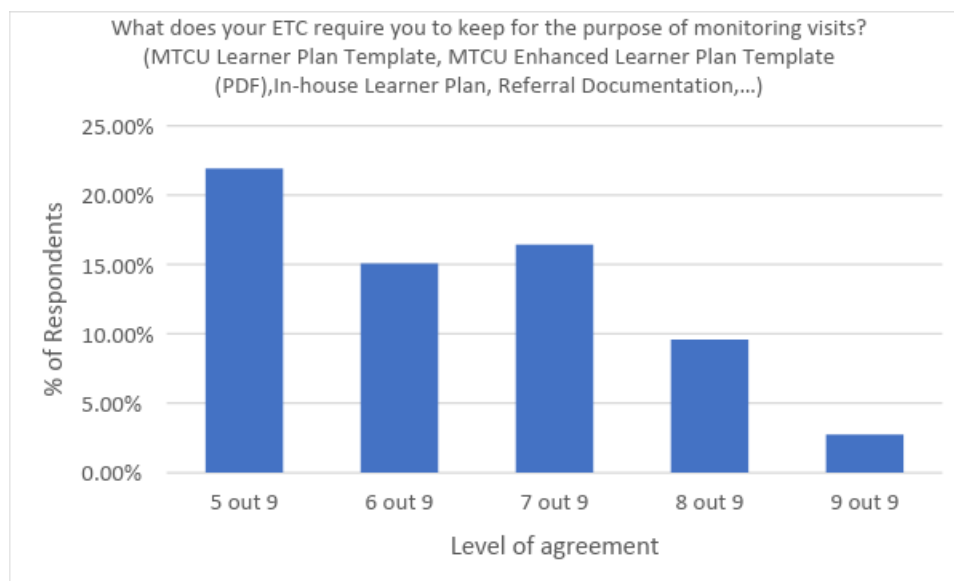
<p>Q2: From your selection from the list on the previous page, what does your ETC require you to keep for the purpose of monitoring visits? A: Mandatory MTCU EO Participation Form, Program-Specific Registration Form, Suitability Checklist (3 options to choose)</p>			
Level of Agreement %	Level of Agreement	# of Respondents	% of Respondents
66.70%	2 out of 3	27	36.99%
100%	3 out of 3	12	16.44%
Total		73	



Question 3

When the respondents were asked to select from the list of files their ETC required from them to keep for the purpose of monitoring visits, 21.92% of respondents selected 5 out of 9 files, 15.07% of respondents selected 6 out of 9 files, 16.44% of respondents selected 7 out of 9 files, 9.59% of respondents selected 8 out of 9 files, and 2.74% of respondents selected all 9 files. The table and chart below represent these results by frequencies and percentages.

Q3: From your selection from the list on the previous page, what does your ETC require you to keep for the purpose of monitoring visits?			
A: MTCU Learner Plan Template, MTCU Enhanced Learner Plan Template (PDF), In-House Learner Plan, Referral Documentation, Evidence of Completed Milestones, Evidence of Completed Culminating Tasks, Marked Record Sheets, Tracking Cards/Sheets, Completed Assignments and/or Tests (9 options to choose)			
Level of Agreement %	Level of Agreement	# of Respondents	% of Respondents
55.56%	5 out of 9	16	21.92%
66.67%	6 out of 9	11	15.07%
77.78%	7 out of 9	12	16.44%
88.89%	8 out of 9	7	9.59%
100%	9 out of 9	2	2.74%
Total		48	



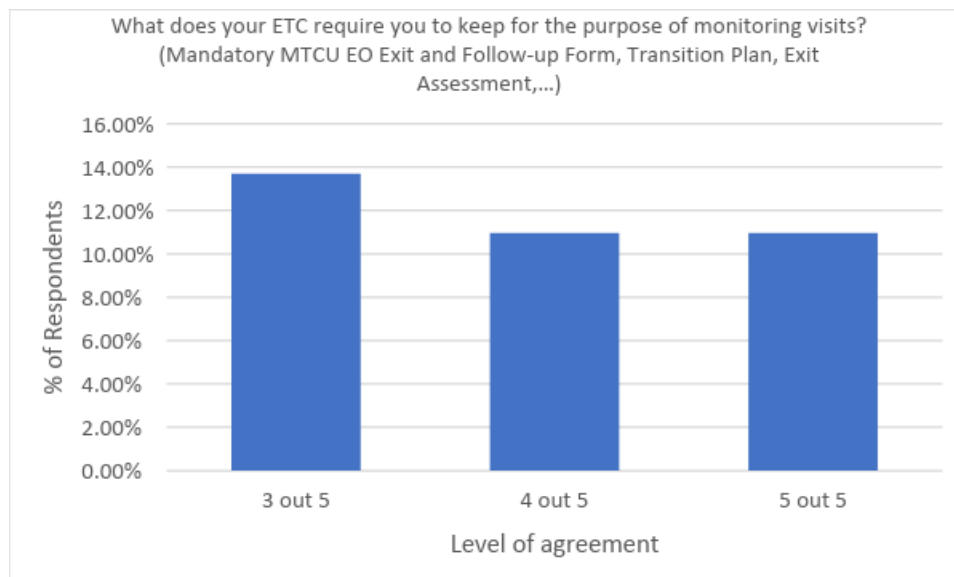
Question 4

When the respondents were asked to select from the list of files their ETC required from them to keep for the purpose of monitoring visits, 13.70 % of respondents selected 3 out of 5 files, 10.96 % of respondents selected 4 out of 5 files, and 10.96 % of respondents selected all 5 files. The table and chart below represent these results by frequencies and percentages.

Q4: From your selection from the list on the previous page, what does your ETC require you to keep for the purpose of monitoring visits?

A: Mandatory MTCU EO Exit and Followup Form, Transition Plan, Exit Assessment, Program-Specific Learner Survey, Certificates (5 options to choose)

Level of Agreement %	Level of Agreement	# of Respondents	% of Respondents
60%	3 out of 5	10	13.70%
80%	4 out of 5	8	10.96%
100%	5 out of 5	8	10.96%
Total		26	



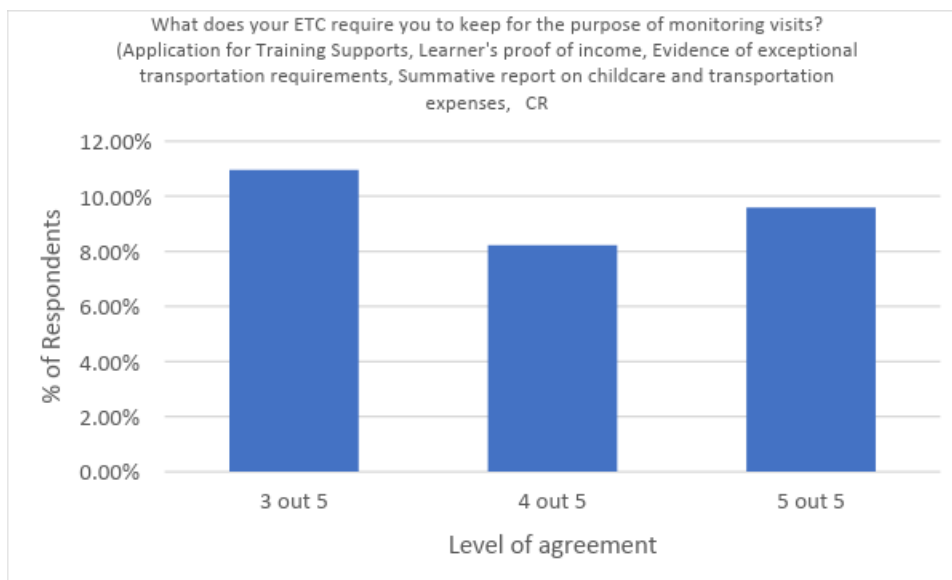
Question 5

When the respondents were asked to select from the list of files their ETC required from them to keep for the purpose of monitoring visits, 10.96 % of respondents selected 3 out of 5 files, 8.22 % of respondents selected 4 out of 5 files, and 9.59 % of respondents selected all 5 files. The table and chart below represent these results by frequencies and percentages.

Q5: From your selection from the list on the previous page, what does your ETC require you to keep for the purpose of monitoring visits?

A: Application for Training Supports, Learner’s Proof of Income, Evidence of Exceptional Transportation Requirements, Summative Report on Childcare and Transportation Expenses, CRA Tax Form (5 options to choose)

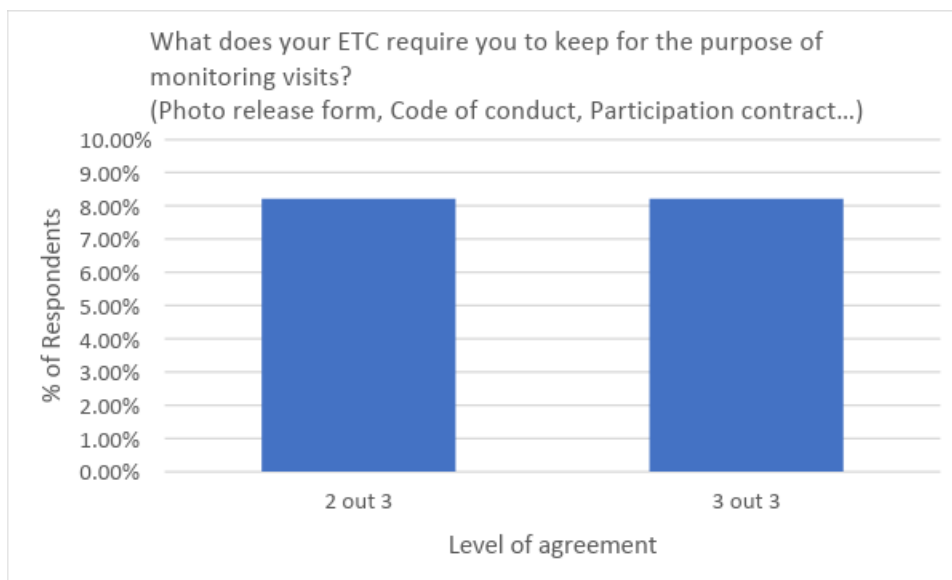
Level of Agreement %	Level of Agreement	# of Respondents	% of Respondents
60%	3 out of 5	8	10.96%
80%	4 out of 5	6	8.22%
100%	5 out of 5	7	9.59%
Total		21	



Question 6

When the respondents were asked to select from the list of files their ETC required from them to keep for the purpose of monitoring visits, 8.22% of respondents selected 2 out of 3 files and 8.22% of respondents selected all 3 files. The table and chart below represent these results by frequencies and percentages.

<p>Q6: From your selection from the list on the previous page, what does your ETC require you to keep for the purpose of monitoring visits? A: Photo Release Form, Code of Conduct, Participation Contract...</p>			
Level of Agreement %	Level of Agreement	# of Respondents	% of Respondents
66.67%	2 out of 3	6	8.22%
100%	3 out of 3	6	8.22%
Total		12	



APPENDIX II: Learner File Summary

See Attached

APPENDIX III: Survey Templates (English and French)

See Attached