



**Ministry of Education
Knowledge Management & Accountability Division**

2015/16 Special Education Enrolment Audit

AUDIT REPORT

**BULKLEY VALLEY CHRISTIAN SCHOOL
(054 96124)**

**BULKLEY VALLEY CHRISTIAN DISTRIBUTED LEARNING
(054 96782)**

2015/16 SPECIAL EDUCATION ENROLMENT AUDIT REPORT
Bulkley Valley Christian Distributed Learning and Bulkley Valley Christian School

Background

The Ministry of Education funds Independent School Authorities based on the Authorities' reported enrolment as of September 30th each year and supplemental special needs classifications in September and February. Independent School Authorities report students with special needs to the Ministry on *Form 1701: Student Data Collection* (Form 1701).

In the 2015/16 school year, the Ministry of Education through the Office of the Inspector of Independent Schools (OIIS) conducted Special Education enrolment audits, in selected schools, to verify reported enrolment on Form 1701.

Purpose

The purpose of the Special Education enrolment audit is to provide assurance to the Ministry of Education and Independent School Authorities that schools are complying with the instructions contained in [*Form 1701: Student Data Collection, Completion Instructions for Independent Schools*](#) and Ministry policies are being followed. The audit also provides assurance that the students reported have been placed in the appropriate special education category, as per the [*Special Education Services: A Manual of Policies, Procedures and Guidelines \(September 2013\)*](#).

Description of the Compliance Audit Process

A compliance audit for both centres was conducted at Bulkley Valley Christian School on March 10, 2016.

Prior to the file reviews, an entry meeting was held with school assigned staff and the audit team interviewed school administrators and staff to enquire about the Independent School Authority's policies, procedures and programs.

Bulkley Valley Christian School reported 21 students and Bulkley Valley Christian Distributed Learning reported two students in special education categories at the Fall 2015 Form 1701 data submission. For the purposes of this audit, 19 student records were reviewed in the following low incidence special needs categories:

Student Claims	Category
2	Category A (Physically dependent)
1	Category B (Deaf/Blind)
11	Category D (Physical Disability or Chronic Health Impairment)
4	Category G (Autism Spectrum Disorder)
1	Category H (Intensive Behaviour Intervention or Serious Mental Illness)

Four student records were also reviewed in the following high incidence special needs categories:

Student Claims	Category
4	Category Q (Learning Disability)

The students had prepared a video focussing on the special needs program of the school for the team to view. The Principal could not be present due to Provincial Championship commitments, but had left a written message for the auditor and offered contact during the day.

The Special Education Director outlined that part of her role was developing and overseeing the IEPs. A Case Manager oversees three student files that have transferred from the Yukon. The files have been organized based upon template references received from special education workshops attended. The School is accessing a variety of Provincial Outreach Programs, assessment facilities, medical professionals, and contractors. Due to their northern location, when travel in/out is not affordable for direct consultation, the School relies on Skype, phone, and written communications. The School described a set timeline for IEP development, identification, referral for services, and delivery. A Manual of Policies and Guidelines for Special Education and Learning Assistance has been developed and requirements for SEAs' professional development established. The file review process described a comprehensive service delivery to students.

The School alerted the auditor that one student had recently left the School (Code D). Designation, IEP, and service evidence was available and reviewed.

Two file issues that required clarification were two students classified as Code A. There were medical assessments supporting that the students were completely dependent on others for meeting all five daily living needs, yet there was also documentation of the two students being ambulatory and great mobility progress being achieved. The School was requested to provide the latest Inclusion Outreach Team reports and other supporting documentation to qualify the mobility levels. The School provided evidence which outlined the mobility of each student was neither purposeful, nor independent for safety reasons, and that the students did use a variety of mobility apparatus. Without such assistance and personal care support, attendance at school would not be possible.

The School has been asked to monitor the mobility level and the level of assistance required each year before reporting either student in Code A.

Another issue requiring discussion and evidence was a file in Code D. The School was reporting a student with allergies and a health plan. The School was requested to provide evidence of impact to functioning and learning, to show medical response records, attendance registers, and service delivery types and levels. The School had photo samples of the reactions. Evidence outlined a chronic health response of severe reactions (potentially anaphylaxis) to multiple allergens resulting in frequent medical response at the school level. Evidence demonstrated that services were in place and present reactions are ongoing, impacting learning. As the student

matures and gains ability to manage the environment it is anticipated that frequency of reaction, level of impact and service will all decrease. Annually the School will need to review evidence and eligibility for the category.

An exit meeting was held with Monique Vander Wart (Vice Principal), Elaine Nanninga (Educational Support Service Director), and Kristine Huxtable (Education Committee Chair) on March 10, 2016. The auditor reviewed the purpose of the audit and the audit criteria, explained the audit reporting process, reported the findings, clarified any outstanding issues, discussed reclassifications for the 2015/16 school year, and expressed appreciation for the assistance provided.

Observations

There were no recommended reclassifications for the student files reviewed by the auditors in Code A, Code B, Code D, Code G and Code H.

Of the four student files reviewed by the auditors in Code Q two students were recommended for reclassification to Regular Education.

The auditor found that:

- At the 1701 Fall Student Collection date, two students reported in Code A showed evidence of meeting criteria as outlined in the Special Education Manual of Policies, Procedures and Guidelines; recent reports support the need for an annual review of mobility evidence and eligibility for the category classification, otherwise reporting in a different category.
- For a student claimed in Code B there was evidence of the student meeting at least four areas of dependency for daily living needs and suggesting the student may qualify for placement in two different categories: A or B. Present IEP goals and services align with the category in which the student is currently reported.
- One student claimed in Code D has health conditions that need to be monitored to determine ongoing impact on functioning and learning. Documentation at the time of the 1701 Data Submission Date meets category designation criteria in accordance with the Special Education Manual of Policies, Procedures and Guidelines.
- School staff verified one student reported in Code D left the school after November 23, 2015. An IEP was on file and evidence of service provision at the Fall Collection date was noted during the audit.
- The documentation of one student claim in Code H currently meets eligibility requirements of the category, yet is showing evidence of improvement from previous years. A Functional Behavioral Assessment and/or other assessments by medical professionals are recommended for guiding next year's designation process.
- Inter-agency involvement for Code H was not well documented.
- Two Code Q student claims recommended to Regular Education did not have an IEP in place at the time of the Fall Data Submission dated after September 30th of the previous school year (2014).
- The assessments used to identify students for Code Q had minimal evidence elements: outlining of persistent difficulties through integrating information related to a number of factors, documenting of weaknesses in processing that contribute to persistent difficulties

with learning, and interpretation of the achievement measures in relation to cognitive ability. Alternative to a full educational psychology report, the psychologist is providing a report for provincial exam adjudication with cognitive and norm-reference tests of academic achievement for determining allowances. The School uses the report in conjunction with the Summary of Assessments for Student File (Appendix 2) from the Handbook of Procedures for the Graduation Program to qualify the students for Code Q.

- The student files were well-organized, data was readily available, documentation was dated, current, and easy to access. The student file arrangement of the distributed learning school is different from the 'standard' school.
- Parents are provided with copies of the IEP meeting notes retained in files.
- The files have up-to-date Medical, Safety, and Behavioral Plans for Codes A, D, and H as well as Function Routine Planning Charts for Code A. All files have individual student SEA schedule charting.
- There was evidence of an extensive Transition Plan for kindergarten students.
- Transitions for high school students were not always located with the files or IEPs; dialogues with staff confirmed plans are in place.
- The IEP format used by the School contained all the pertinent areas outlined in the Special Education Services Manual of Policies Procedures and Guidelines.
- The IEPs for students in all categories were written to reflect the specific needs of each individual student. The goals and strategies often reflected recommendations from various assessment or medical reports.
- There were instances of little to no measurability included within IEP goals/objectives.
- The service delivery was appropriate, adequate, and well documented.

Recommendations:

The auditor recommended that:

- The School ensure student claims in Code A continue to contain assessment documentation verifying the student is completely dependent on others for meeting all major daily living needs and the student requires assistance at all times for feeding, dressing, toileting, mobility and personal hygiene, in accordance with the Special Education Manual of Policies, Procedures and Guidelines and Form 1701 Instructions.
- In order to identify a student in a Special Needs category at the time of Fall 1701 Submission Date, a current IEP must be in place dated after September 30, of the previous year. Next year ensure all students identified have current IEPs developed by the submission date.
- Next year, for one Code D student, the School monitor and obtain updated assessment documentation and/or other information indicating current extent of impact the medical condition is having on functioning and education continues to be significant in accordance with the Special Education Manual of Policies, Procedures and Guidelines.
- A Functional Behavioral Assessment and/or other updated assessments by medical professionals are in place to guide next year's designation process, of determining Code R or Code H, for the current Code H claim.
- Documentation of across-agency planning for Code H be ongoing and well-documented.
- The School request an addendum to the assessments used to identify students for Code Q, in order to demonstrate meeting the assessment criteria as per the Special Education Manual of Policies, Procedures and Guidelines.

- The School review IEPs to ensure measurability is added to those objectives where it is absent and transition planning is in place for all Grade 10 to 12 students.
- The Code D students identified in the Appendices have goals that align more closely or extensively with the physical needs of the students.

Auditor's Comments

The auditor expresses appreciation to the School staff for their cooperation and hospitality during the audit.