



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

2015/16 Special Education Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 39 (Vancouver)

2015/16 SPECIAL EDUCATION ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 39 (Vancouver)

Background

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

In the 2015/16 school year, school boards reported 26,633 students enrolled in the low incidence supplemental special education funding categories at September 2015. School District No. 39 (Vancouver) reported 2376 students in the supplemental special education funding categories as of September 30, 2015. For the purpose of this compliance audit, School District No.39 (Vancouver) reported 78 students in the Physically Dependent Category (Code A), four students reported in the Deafblind Category (Code B), 102 students in the Moderate to Profound Intellectual Disability Category (Code C), 798 students in the Physical Disability or Chronic Health Impairment Category (Code D), 18 students in the Visual Impairment Category (Code E), 94 in the Deaf or Hard of Hearing Category (Code F), 737 in the Autism Spectrum Disorder Category (Code G), and 545 in the Intensive Behavior Intervention/Serious Mental Illness Category (Code H).

The Ministry of Education annually conducts Special Education enrolment audits, in selected school districts, to verify reported enrolment on Form 1701. School districts are selected for audit based on a variety of factors, including the length of time since their last audit, the district's incidence levels compared to the provincial incidence levels, and changes in enrolment.

Purpose

The purpose of the Special Education enrolment audit is to provide assurance to the Ministry of Education and boards of education that school districts are complying with the instructions contained in [*Form 1701: Student Data Collection, Completion Instructions for Public Schools*](#) and Ministry policies are being followed. The audit also provides assurance that the students reported are receiving the service and 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 Audit Process

A Special Education enrolment audit was conducted in School District No. 39 (Vancouver) during the week of February 1, 2016.

An entry meeting was held on February 1, 2016 with the Superintendent, the Associate Superintendent, the Director of Instruction, the District Principal, the District Principal of Student Support Services, the Vice Principal of Student Support Services, the District Principal of Alternative Education, and the Vice Principal of Student Support Services. Daily meetings

with the Director of Instruction were held to present preliminary findings and to seek clarification related to the contents of files.

Prior to the file reviews, the Associate Superintendent, Learning Services, provided a power point presentation with a handout which provided a broad overview of the District. The Director of Instruction presented each auditor with comprehensive binder of Special Education policies, procedures and programs offered in the District. It also contained some forms used pertaining to special education or alternate education.

A sample of 78 student files reported in the Physically Dependent category (Code A), four student files in the Deafblind (Code B), 20 student files in Moderate to Profound Intellectual Disabilities (Code C), 150 student files in Physical Disability or Chronic Health Impairment (Code D), five student files in Visual Impairments (Code E), six student files in Deaf or Hard of Hearing (Code F), 20 student files in Autism Spectrum Disorder (Code G), and 150 student files in Intensive Behavior Interventions/Serious Mental Illness (Code H) special needs categories were reviewed and evaluated to determine if the students in these categories were accurately reported on Form 1701.

Meeting daily with the Director of Instruction enabled the audit team to keep the District staff apprised of the audit progress.

There were four students reported in the wrong category. The evidence found in the student file by the auditors met the criteria for three of the four students to be placed in a different category. The District staff confirmed that this was due to a clerical error when reporting the student.

The file review process did not encounter issues requiring school visits.

An exit meeting was held with the Superintendent, two Associate Superintendents, the Director of Instruction, four District Principals, the Vice Principal of Student Support Services, a Student Learning Services Teacher and a Special Education Case Manager on February 5, 2016. The auditors reviewed the purpose of the audit and the audit criteria, explained the audit reporting process, reported their findings, clarified any outstanding issues, discussed reclassifications for the 2015/16 school year, and expressed appreciation for the assistance provided.

Observations:

Of the 78 student files reviewed by the auditors in Code A:

- two students were recommended for reclassification to Code C
- two students were recommended for reclassification to Code D
- two students were recommended for reclassification to Code G

There were no recommended reclassifications for the four student files reviewed by the auditors in Code B.

Of the 20 student files reviewed by the auditors in Code C:

- two students were recommended for reclassification to Code D

Of the 150 student files reviewed by the auditors in Code D:

- one student was recommended for reclassification to Code C
- one student was recommended for reclassification to Code G
- one student was recommended for reclassification to Code H
- one student was recommended for reclassification to Code Q
- three students were recommended for reclassification to Regular Education

Of the five student files reviewed by the auditors in Code E:

- one student was recommended for reclassification to Code G

There were no recommended reclassifications for the six student files reviewed by the auditors in Code F.

There were no recommended reclassifications for the 20 student files reviewed by the auditors in Code G.

Of the 150 student files reviewed by the auditors in Code H:

- one student was recommended for reclassification to Code F
- two students were recommended for reclassification to Code R
- four students were recommended for reclassification to Regular Education

The auditors found that:

- Six student claims did not have evidence to meet criteria for placement in the Physically Dependent Category (Code A). The evidence verified the students did not require assistance at all times for all major daily living needs as outlined in the Special Education Manual of Policies, Procedures and Guidelines.
 - Two students had multi-disciplinary assessments by Sunnyhill Health Centre (2012 and 2008) and met the criteria for Autism Spectrum Disorder (Code G).
 - Evidence in one student file met all the criteria for Moderate to Profound Intellectual Disability (Code C). Evidence in another student file met the criteria for Physical Disability/Chronic Health Impairment (Code D). The District staff verified that the Code A claim for both students was the result of a clerical error.
 - One student had made significant improvements and no longer met the criteria for Code A. A Sunnyhill Health Centre assessment indicated this student met the criteria for Code C.
 - One student claimed in Code A had surgery April 8, 2015 and no longer met the criteria for Code A but evidence verified criteria was met for Code D.
- Two student claims for Code C did not have evidence to meet the Moderate to Profound Intellectual Disability category criteria.
 - One student claim did not have a cognitive assessment to support the category as outlined in the Special Education Manual of Policies, Procedure and Guidelines. There was evidence of assessment data verifying Down Syndrome. The current IEP had goals, objectives and services supporting the criteria for Code D.
 - One student claim had a multi-disciplinary team diagnosis of FASD as well as goals and services to support the criteria for Code D.

- Seven student claims in Code D did not have evidence to meet the criteria for the Physical Disability/Chronic Health Impairment category.
 - One student claim had evidence of a diagnosis of ASD when assessed by Sunnyhill Health Centre in June 2015. The IEP was rewritten and the goals, objectives and the services supported placement in Code G.
 - One student claim had evidence of a diagnosis of an anxiety disorder. There was no evidence to support a physical disability or a chronic health disorder. The student had outside agency support through Midtown Mental Health, and the goals and services supported placement in Code H.
 - One student claim had no evidence of a diagnosis, no IEP in place and no additional services in place.
 - One student claim had no evidence of a diagnosis to support placement in this category. There was evidence the student had a psycho-educational assessment and an adaptive behaviour scale as well as a current IEP and services in place which supported placement in Code C.
 - One student claim had evidence the student, in past years, presented with seizures. Evidence in the files identified the student had not had a seizure since 2007 and supported the criteria for Learning Disabilities (Code Q).
 - A student reported in Code D had been seizure free since 2008. There was no evidence to support placement in the category in which the student was claimed. It was verified that no additional educational program or services were being provided by the District.
 - For one student claim, there was no evidence to support the claim in Code D. The student was not in attendance at September 30th nor was there evidence of any additional educational program or services being provided by the District.
- One student reported in Code E did not meet the criteria aligned with the Visual Impairment category. This student was assessed by the Sunnyhill Provincial Autism Resource Centre in June 2015. The evidence found by the auditors verified that the student did not meet the criteria for Code E. The evidence did verify the criteria for Autism Spectrum Disorder (Code G) was met. The IEP goals and services also supported criteria for Code G.
- Seven student claims for Code H did not have evidence to meet the criteria for placement in the Intensive Behaviour Interventions/Serious Mental Illness Category.
 - Two student claims had no evidence to support that planning was coordinated, across agency and community. There was no integrated case management. These two students were verified to meet criteria aligned with Requiring Behaviour Support or with Mental Illness (Code R).
 - For two student claims it was verified that neither student received supports or services for the brief attendance in September of the 2015/16 school year. There was no evidence found to support a placement in this or any other special education category.
 - One student claim had no IEP since September 2013 and no other evidence to support a placement in Code H.
 - One student claim had no evidence of a behaviour or mental health assessment or any other evidence to support a placement in Code H.
 - One student claimed in Code H met all the criteria for Code F. The District verified that a clerical error was made. The IEP and services provided all support a placement in Code F.

- Two students claimed in Code H did not have the outside agency involvement by the claim date. There was evidence that many efforts had been made by the District to get support. In this instance only there is no recommended adjustment as the IEPs and other supports were in place for these students that aligned with the category criteria.
 - One student's parent insisted on arranging outside agency support. In spite of the District's efforts to help, the parent refused any help and did not follow through with the commitment.
 - One student attended both elementary and secondary Social Development Programs. Each year the staff encouraged mental health interventions but the parent repeatedly and vehemently refused.
- The files were well organized providing easy access to the evidence the auditors were seeking and the information within the files was clearly labeled.
- In some schools, evidence in the School Based Team minutes indicated that regular reviews of student designations were undertaken.
- The District has a practice of using an asterisk by the name of the parent(s) to indicate that a parent was offered the opportunity to be consulted about the preparation of the IEP. This was not done on a consistent basis. Often the asterisk was not applied by the parent name, but there were indications in the file that the parent had been offered the opportunity to participate.
- The IEP template is clear and contains the requirements of an IEP. Although consistently used in most schools, there was a different format in at least one of the alternate schools.

Recommendations:

The auditors recommend that:

- The District ensure student claims in Code A contain assessment documentation verifying the student is completely dependent on others for meeting all major daily living needs and that the student requires assistance at all times for feeding, dressing, toileting, mobility and personal hygiene, as outlined in the Special Education Manual of Policies, Procedures and Guidelines.
- The District ensure that Form 1701 reporting is verified prior to submission and that student files are updated and reviewed regularly to ensure the students meet the criteria in the category in which they are claimed for the reported school year.
- The District report student claims in Code C only if they meet the criteria listed in the Special Education Manual of Policies, Procedures and Guidelines for that category. Assessment documentation showing the student's intellectual functioning in three or more standard deviations below the mean on an individually administered Level C Assessment and assessment documentation shows there are limitations of a similar degree in two or more adaptive skill areas.
- The District ensure student claims in Code D meet the criteria listed in the Special Education Manual of Policies Procedure and Guidelines for that category. There must be documentation of a medical diagnosis in one or more of the following areas: nervous system impairment that impacts movement or mobility, musculoskeletal condition, or chronic health impairment that seriously impacts student's education and achievement.

- The District ensure there is report evidence from an ophthalmologist, optometrist, orthoptist or the Visually Impaired program at B.C. Children's Hospital that describes the student's vision impairment.
- The District ensure student claims in Code H with a mental health diagnosis have evidence to support the diagnosis was made by a qualified mental health clinician. There must be evidence that planning is coordinated across agency and community as specified in the Special Education Manual of Policies, Procedures and Guidelines. There must be an IEP in place dated after September 30th of the previous school year and the students must be receiving additional services.
- The District ensure that the diagnosis meets the criteria for a special education designation.
- The District ensure the medical information regarding the students claimed is current and that processes are in place for declassifying students when they no longer meet category placement.
- The District report only student claims in each category when there is evidence to verify criteria has been met and that a plan for the delivery of appropriate special education services are in evidence at the time of the required claim.
- A more consistent/accurate method be adopted to record parent involvement in the IEP process.

Auditors' Comments

The auditors wish to express their appreciation to the District staff for their cooperation and hospitality during the audit.