



**Ministry of Education
Resource Management Division
Funding and Financial Accountability Branch**

2018/19 Special Education Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 36 (Surrey)

2018/19 SPECIAL EDUCATION ENROLMENT AUDIT REPORT

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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 2018/19 school year, school boards reported 31,314 students enrolled in the low incidence supplemental special education funding categories at September 2018. School District No. 36 (Surrey) reported 8,137 students in the special education categories as of September 28, 2018. For the purpose of this compliance audit, School District No. 36 (Surrey) reported 75 student claims in the Physically Dependent Category (Code A), 12 student claims reported in the Deafblind Category (Code B), 221 student claims in the Moderate to Profound Intellectual Disability Category (Code C), 1,237 student claims in the Physical Disability or Chronic Health Impairment Category (Code D), 41 student claims in the Visual Impairment Category (Code E), 130 student claims in the Deaf or Hard of Hearing Category (Code F), 1422 student claims in the Autism Spectrum Disorder Category (Code G), and 838 student claims 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 \(April 2016\)*](#).

Description of the Audit Process

A Special Education enrolment audit was conducted in School District No. 36 (Surrey) during the week of January 14, 2019.

An entry meeting was held on January 14, 2019 with the Superintendent, the Assistant Superintendent, Secretary Treasurer, Director of Instruction and three District Principals. 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 Director of Instruction provided an extensive power point presentation which provided the auditors a comprehensive overview of the many different programs, innovations and challenges in the District.

A sample of 57 student files reported in Physically Dependent (Code A), six student files in the Deafblind (Code B), 27 student files in Moderate to Profound Intellectual Disabilities (Code C), 150 student files in Physical Disability or Chronic Health Impairment (Code D), ten student files in Visual Impairments (Code E), 12 student files in Deaf or Hard of Hearing (Code F), 35 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.

The file review process did not encounter issues requiring school visits. Meeting daily with the Director of Instruction and her team enabled the audit team to keep District staff apprised of the audit progress.

An exit meeting was held with the Superintendent, Assistant Superintendent, Director of Instruction, three District Principals, and one Administrator on January 18, 2019. 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 2018/19 school year, and expressed appreciation for the assistance provided.

Observations:

Of the 57 student files reviewed by the auditors in Code A:

- One student was recommended for declassification of any special needs category

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

Of the 27 student files reviewed by the auditors in Code C:

- One student was recommended for declassification of any special needs category

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

- Seven students were recommended for reclassification to regular education
- Five students were recommended for reclassification to a different low incidence special need category

Of the 12 student files reviewed by the auditors in Code F:

- One student was recommended for reclassification to a different low incidence special need category

Of the 35 student files reviewed by the auditors in Code G:

- Two students were recommended for declassification of any special needs category.

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

- Nine students were recommended for reclassification to regular education.

The auditors found that:

- One student did not meet criteria for placement in Code A. The student was not attending as of the claim date and no services were provided to address the identified needs in the IEP and assessments. The student did not attend school at all due to various issues. Without evidence of school district supports to meet the Special Education supplemental criteria, the adjustment for the student claim reflects the student's non-attendance at the claim date as well as a declassification from any special needs category.
- One student reported as a non-graduated adult with a Code C designation had no evidence of attending at the September claim date nor was there evidence aligned with the [Adult Funding Policy](#) which says: *"Adult students who have not graduated are eligible for special needs funding if they have special needs under certain circumstances...Adult students must also have been reported on the Form 1701 in the prior school year (i.e. they are continuing their K-12 education program uninterrupted from when they were still school age), and are working towards their goals set out in their Individual Education Plan (IEP)."* The District staff were unable to provide evidence the student was continuing their educational program uninterrupted or working towards the goals set out in the IEP. The last archived IEP was in 2015. A document in the file dated December 21, 2018 indicated the individual was in another country, with a further update indicating a return to Canada and was now working. Without evidence aligned with the eligibility criteria, the adjustment reflects the student's non-attendance at the claim date as well as a declassification from any special needs category.
- Seven students claimed by the District in Code D were without evidence to meet the criteria for placement in Code D (Physical Disability/Chronic Health). None of the seven student claims had evidence to meet criteria for any special needs category based on the following:
 - Three adult students in Code D enrolled in Continuing Education for the 2018/19 school year were claimed for supplemental funding. The District staff were unable to provide evidence that these students were continuing their K-12 education program uninterrupted from when they were school aged and working towards their goals set out in their IEP.
 - One adult student claimed in Code D had no student file available or any evidence to confirm a medical diagnosis; was without evidence of services being provided; nor evidence to support this adult was working on their K-12 education program uninterrupted from when they were school aged working toward the goals set out in their IEP.
 - A student was claimed in Code D due to a medical condition. No evidence was found to support that the student's health condition was significantly affecting their education or functioning. The student independently follows their medical diabetic protocol and was without evidence to meet criteria for any special needs classification.
 - One student was claimed in Code D due to a medical condition. It was verified that the individual's condition no longer affected their education.
 - One student claimed in Code D was without evidence to meet the criteria for classification in any special needs category. There was no evidence that the school-aged graduate, taking an English 12 course in Distributed Learning, was receiving any support services.
- Five students reported in Code D were without a medical diagnosis aligned with the criteria for placement in the Physical Disability or Chronic Health Impairment category.

- For four student claims there was assessment evidence in the Instructional Support Planning Tool and service provision which met the criteria for placement in a different low incidence special need category.
- One student had no evidence of a physical disability or a chronic health diagnosis. There was evidence of an assessment by the BCAAN network with services in place aligned with the criteria for Code G.
- One student claimed in Code F had evidence of a hearing loss. While there was a report from the CDBC without reference to a hearing loss, there was evidence of a medical diagnosis with supports in place to address the student's needs aligned with the criteria for Code D.
- Two student claims for Code G were without evidence to meet criteria for placement in the category the District reported for funding.
 - One adult student was not attending at the claim date. Evidence verified the individual left Grade 12 in 2017 and returned in April 2018. There was no evidence that the student was continuing their K-12 education program uninterrupted from when they were school aged and working towards their goals set out in their IEP. Without evidence aligned with the eligibility criteria, the adjustment reflects the student's non-attendance at the claim date as well as a declassification from any special needs category
 - Evidence verified that one student was not attending and was not receiving any services to support the needs as identified in the supporting documentation. Without evidence aligned with the eligibility criteria, the adjustment reflects the student's non-attendance at the claim date as well as a declassification from any special needs category
- Eight adults and one school aged graduate reported in Code H were enrolled in Continuing Education for the 2018/19 school year. The District was unable to provide evidence that the adult students were continuing their K-12 education program uninterrupted from when they were school aged and working toward their goals set out in their IEP. In addition it was verified that:
 - One adult student had no current behaviour information and the last IEP was dated 2015.
 - One adult student had no behaviour assessment information, no current behaviour information and no IEP goals.
 - One adult student was assessed in the mild to moderate behaviour range. While there was evidence describing behaviour as aggressive in 2011, there was no current evidence of intensive behaviour and no mental health information.
 - One adult Surrey Pre-trial student previously designated in Code H with a diagnosis of Attention Deficit Hyperactivity Disorder had no IEP from the previous year.
 - One adult Surrey Pre-trial student had no IEP from the previous year or evidence of behaviour information.
 - While one adult student in Surrey Pre-trial had evidence of a current Instructional Support Planning Tool, an IEP and a Functional Behaviour Assessment indicating "the student declined to get involved", there was no current evidence of behaviour. The previous evidence was an archived IEP from 2012 indicating the student was claimed in Code H.
 - There is no evidence of an IEP from the previous school year with the last archived IEP on file dated 2013/14 for one Surrey Pre-trial adult student.
 - Another adult student with a current Functional Behaviour Assessment and an IEP had no mental health diagnosis evidence and the previous IEP was dated 2013/14.

- A school-aged graduate had no evidence of an IEP or a behaviour assessment evidence since 2011.

None of the nine student claims had evidence to meet criteria for any special needs category.

Recommendations:

The auditors recommend that:

- The District staff ensure that all claims meet the appropriate category criteria on or before the claim date.
- The District staff ensure that all students claimed are enrolled and attending at the claim date.
- The District staff refrain from reporting adult students for supplemental funding unless it is verified students are continuing their K-12 education program uninterrupted from when they were school-aged and that these student claims meet the requirements of the Adult Funding Policy, Form 1701 Instructions and the Special Education Services Manual of Policies, Procedures and Guidelines prior to reporting for supplemental funding.
- The District staff ensure that the student's health condition significantly impacts education and functioning prior to reporting for supplemental funding.
- The District staff ensure any student claims in Code D meet the criteria listed in the Special Education Manual of Policies, Procedures 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.
 - A diagnosis of a complex development behaviour condition must be made by either CDBC Network or BCAAN Network or a qualified medical professional (paediatrician, psychiatrist, neurologist) or a medical professional specializing in developmental disorders in consultation with a multi-disciplinary team of specialists (i.e. registered psychologist, speech/language pathologist, occupational therapist, physical therapist).
- The District staff ensure any student claims in Code F meet the criteria listed in the Special Education Manual of Policies, Procedures and Guidelines for that category.
 - A qualified teacher of the deaf and hard of hearing provides assessment and services.
 - There must be documentation that there is an annual assessment.
 - The unilateral hearing loss is moderate to profound.
 - The student has educationally significant problems directly attributable to the loss.
- The District ensure any student claims in Code G meet the criteria listed in the Special Education Manual of Policies, Procedures, and Guidelines for that category.
 - There must be documentation of a clinical diagnosis and assessment by a qualified specialist in keeping with the Provincial Standards. The assessment must include and integrate information from multiple sources and various professionals from different disciplines: BCAAN or a paediatrician, psychiatrist or registered psychologist whose assessment meets Standards and Guidelines and adopted BCAAN policy.
- The District staff ensure any student claims in Code H meet the criteria listed in the Special Education Manual of Policies, Procedures and Guidelines for that category.

- There must be documentation that there is evidence of antisocial, extremely disruptive behaviour in most environments and consistently/persistently over time.
- There is documentation of the settings in which the behaviour is persistent over time.
- That planning is coordinated across agency and community (integrated case management/wraparound).
- The District staff ensure student files are updated and reviewed regularly to ensure the claims meet the category criteria in which the students are claimed for the reported school year.

Auditors' Comments

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