



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

2018/19 Special Education Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 79 (Cowichan Valley)

2018/19 SPECIAL EDUCATION ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 79 (Cowichan Valley)

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.79 (Cowichan Valley) reported 1,066 students in the special education categories as of September 28, 2018. For the purpose of this compliance audit, School District No.79 (Cowichan Valley) reported 10 student claims in the Physically Dependent Category (Code A), one student claims reported in the Deafblind Category (Code B), 40 student claims in the Moderate to Profound Intellectual Disability Category (Code C), 147 student claims in the Physical Disability or Chronic Health Impairment Category (Code D), seven student claims in the Visual Impairment Category (Code E), 15 student claims in the Deaf or Hard of Hearing Category (Code F), 168 student claims in the Autism Spectrum Disorder Category (Code G), and 128 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. 79 (Cowichan Valley) during the week of December 10, 2018.

An entry meeting was held on December 10, 2018 with the Superintendent, two Associate Superintendents, a previous Assistant Superintendent, the Secretary Treasurer, District Principal and the Director of Aboriginal Education and Learner Engagement. Daily meetings with the

previous Assistant Superintendent, Associate Superintendent and District Principal were held to present preliminary findings and to seek clarification related to the contents of files.

A sample of 10 student files reported in Physically Dependent (Code A), one student file in Deafblind (Code B), 20 student files in Moderate to Profound Intellectual Disabilities (Code C), 100 student files in Physical Disability or Chronic Health Impairment (Code D), five student files in Visual Impairment (Code E), five student files in Deaf or Hard of Hearing (Code F), 39 student files in Autism Spectrum Disorder (Code G), and 100 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 District staff were able to provide the audit team with evidence when clarification was required. Meeting daily with the former Assistant Superintendent, Associate Superintendent and District Principal enabled the audit team to keep the District staff apprised of the audit progress.

The file review process encountered an issue requiring school visits. There were several students reported in Code A for whom the evidence in the file did not support that they were claimed in the correct category. Although students were dependent on others, evidence in the student files supported a claim in a different category.

An exit meeting was held with the Superintendent Designate, Assistant Superintendent, District Principal Support Services, two Learning Support Teachers, District Counsellor, two School Psychologists, District Occupational Therapist, Teacher of the Deaf and Hard of Hearing, Teacher of the Visually Impaired/O&M/FI Support and the Support Services Secretary on December 14, 2018. 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 10 student files reviewed by the auditors in Code A:

- Three students were recommended for reclassification to a different low incidence special need category

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

Of the 39 student files reviewed by the auditors in Code G:

- Two students were recommended for declassification to Regular Education

The auditors found that:

- The files were comprehensive containing all the documentation required to verify the claims.
- There were a number of forms used consistently by the District containing helpful information for verification. These included: Parent Acknowledgement Ministry of Education SPED Identification Process, 1701 Identification with Ministry of Education

Resource for Student Planning, SD79 Student Support Services–Additional Services and Support Checklist and Annual Special Education Designation Renewal.

- The diagnostic information was relative to each category claim and contained current pertinent evidence supporting the criteria for each category.
- The IEPs were current and comprehensive. The goals were specific to the category claim. The objectives were measurable. The methods for measurement and evaluation were defined and documented on the IEP.
- The services provided to the students were appropriate to the category in which the student was claimed.
- There was evidence that students were receiving a program that corresponded to the individual needs outlined on the IEP and reflected recommendations made in a variety of assessment reports.
- Although there were a variety of IEP formats used throughout the District, all contained the essential components outlined in the IEP Order.
- The Instructional Support Planning Process documents were used fairly consistently throughout the District. This document provided useful information to support the category claim.
- There was evidence in the student files that the District reviewed designations and made changes as needed.
- Three student claims were without evidence to meet criteria for a Code A designation, the Physically Dependent Category. While these students did require an intensive amount of support, 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. These students were recommended for reclassification to a different low incidence special need category.
- While not aligned with the Ministry guidelines, the District staff maintained information was received from the Ministry of Education, Inclusive Education staff that students with safety mobility issues could be claimed as Code A
- Two student claims in Code G did not have evidence to meet the criteria for the Autism Spectrum Disorder category. As there was no evidence of a diagnosis, no IEP in place and no additional services in place, recommendation was for declassification from any special needs category. The District staff indicated these students were claimed in error.

Recommendations:

The auditors recommend that:

- The District ensure student claims in Code A contain assessment evidence 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, in accordance with the Special Education Manual of Policies, Procedures and Guidelines for the Physically Dependent category.

- 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.

Auditors' Comments

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

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Ministry of Education
December 17, 2018**
