



**Ministry of Education  
Resource Management Division**

**2012/13 Special Education Enrolment Audit**

**AUDIT REPORT**  
*(Revised May 30, 2013)*

**SCHOOL DISTRICT No. 82 (Coast Mountains)**

## **2012/13 SPECIAL EDUCATION ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 82 (Coast Mountains)**

### **Background**

The Ministry of Education funds boards of education based on the boards' reported enrolment as of September 30<sup>th</sup> 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 2012/13 school year, school boards reported 24,296 students enrolled in the Level 1, 2, and 3 supplemental special education funding categories at September 2012. School District No. 82 (Coast Mountain) reported 233 students in these supplemental special education funding categories as of September 30, 2012. For the purpose of this compliance audit, School District No. 82 (Coast Mountain) reported one student in the Physically Dependent Category (Code A); and 42 students were reported in the Moderate to Profound Intellectual Disability Category (Code C); 103 students in the Physical Disability or Chronic Health Impairment Category (Code D); five students in the Visual Impairment Category (Code E); nine students in the Deaf or Hard of Hearing Category (Code F); 38 students in the Autism Spectrum Disorder Category (Code G); and 35 students in the Intensive Behaviour Interventions or Serious Mental Illness Category (Code H).

The Resource Management Division 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 have been placed in the appropriate special education category, as per the *Special Education Services: A Manual of Policies, Procedures and Guidelines* (September 2009).

### **Description of the Audit Process**

A Special Education enrolment audit was conducted in School District No. 82 (Coast Mountain) during the week of February 25, 2013.

An entry meeting was held on February 25, 2013, with the Superintendent, Secretary Treasurer, Director of Instruction-Learner Support, District Principal-Learner Support and District Psychologist. Daily meetings were held with the Director of Instruction-Learner Support,

District Principal-Learner Support and the District Psychologist to present preliminary findings and to seek clarification related to the contents of files.

Prior to the file reviews, the auditors interviewed District staff to enquire about the District's policies, procedures and programs. The auditors were provided with a folder of the District's organization and overview of support services, as well as distances of specific schools.

A sample consisting of one student file reported in the Physical Dependent Category (Code A), 21 student files in the Moderate to Profound Intellectual Disability Category (Code C), 65 student files in the Physical Disability/ or Chronic Health Impairment Category (Code D), three student files in the Visual Impairment Category (Code E), six student files in the Deaf or Hard of Hearing Category (Code F), 19 student files in the Autism Category (Code G), and 35 student files in the Intensive Behaviour Interventions or Serious Mental Illness (Code H) were reviewed and evaluated to determine if the students in these categories were accurately reported on Form 1701.

The audit team was unable to undertake school visits due to time constraints resulting from issues encountered with Code H student claims reported by Parkside Secondary School. While the audit sample was provided to the District in advance of the audit, the documentation for this school was not in the District files as anticipated. In order for the claims to be evaluated, documentation had to be sent from the high school to the District office during the course of the audit.

An exit meeting was held with the Superintendent, Secretary Treasurer, Director of Instruction-Learner Support, District Principal-Learner Support and the District Psychologist on March 1, 2013. The auditors reviewed the purpose of the audit and the audit criteria, explained the audit reporting process, reported their preliminary findings, clarified any outstanding issues, discussed reclassifications for the 2012/13 school year, and expressed appreciation for the assistance provided.

## **Observations**

There was no reclassification recommendation for the one student file reviewed by the auditors in Code A.

Of the 21 student files reviewed by the auditors in Code C:

- two student claims were recommended for reclassification to Code D.
- one student claim was recommended for reclassification to regular education.

Of the 65 student files reviewed by the auditors in Code D:

- one student claim was recommended for reclassification to Code G.
- five student claims were recommended for reclassification to Code Q.

Of the three student files reviewed by the auditors in Code E, no student claims were recommended for reclassification.

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

- One student was recommended for reclassification to regular education. Through the appeal process additional evidence not presented at the time of the audit indicated criteria was met for Code D.

Of the 19 student files reviewed by the auditors in Code G, no student claims were recommended for reclassification.

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

- One student was recommended for reclassification to Code G.
- Two students were recommended for reclassification to Code R
- One student was recommended for reclassification to regular education

The auditors found that:

- One student reported in Code C had documentation of FASD supporting placement in Code D.
- One student reported in Code C had documentation to identify they were diagnosed with spastic quadriplegia and student uses a power wheelchair. The 2012 cognitive assessment identified cognitive function as high. The diagnosis of Cerebral Palsy supports the criteria for Code D.
- One student reported in Code C had no cognitive assessment in accordance with the Special Education Manual of Policies, Procedures and Guidelines. As there was no file documentation to verify the category claim, the reclassification was to regular education.
- Two students diagnosed as having Development Co-ordination Disorder (DCD) with no other co-morbid diagnosis were reported incorrectly in Code D and should have been reported in Code Q.
- One student diagnosed as having Development Co-ordination Disorder (DCD) with no other co-morbid diagnosis was reported incorrectly in Code D. The IEP goals were consistent with the criteria for Code Q.
- Two students reported in Code D were diagnosed as having Development Co-ordination Disorder (DCD) with no other co-morbid diagnosis showed that DCD had no serious impact on their education and met criteria for Code Q.
- One student reported in Code D had documentation to support Complex Developmental Behaviour Disorder meeting the Code G criteria.
- One student whose audiology report supported placement in Code F was recommended to regular education. Documented evidence in the file verified that the student no longer required Code F support, nor was there evidence the student encountered substantial educational difficulty due to the hearing loss. However, post-audit the District provided evidence meeting criteria for Code D for the current school year.
- Three students had moved out of the District after the September claim period. Two of these student files contained documentation to support the category in which they were claimed (one student claim for Code C and one student claim for Code F). The third student claim reported in Code H did not have documentation to verify the category Code claim and was reclassified to regular education.
- Two student claims for Code H had documentation that showed no severity for the category. The evidence provided for both students is not indicative of antisocial extremely disruptive

behaviour that places the student or others at serious risk. Both students have challenges but the file information as presented supports placement in Code R.

- One student claimed in the Code H category had documentation from the BC Autism Network to support Autism Spectrum Disorder and was recommended for reclassification to Code G.
- The documentation for a Grade 1 and a Grade 2 student claim in Code C did not contain cognitive assessment documentation. There was no recommended adjustment in this instance only, as it was verified that the service requirements were being met. However, in accordance with the Special Education Manual of Policies, Procedures and Guidelines, these two students require a cognitive assessment to meet criteria for Code C or be reclassified to regular education in the 2013/14 school year.
- Documentation for a Grade 4 student reported in Code F indicated the requirement for an updated Audiological report and a language assessment to remain in this category for 2013/14 school year.
- One Grade 3 student, whose parent did not allow any diagnostic report information to be included in the student's file, was claimed in Code H. There was no recommendation for reclassification, in this instance only, as there was evidence that support services were being provided. However, to meet the criteria supporting the Special Education category, the District continue to encourage the parent to bring in the diagnosis to enable the District to reference viewing the documentation used to support funding eligibility and, in turn, ensure the students needs are correctly identified and appropriate services provided. If this does not occur within the next year despite requests by the District, there is no evidence to verify placement in Code H for the 2013/14 school year and future years.
- Specific to the documentation contained in the Code H student files:
  - The Elementary school files contained all the evidence to support the claims.
  - In many instances, the District files for the Parkside Secondary School student claims were missing key pieces of evidence that were subsequently provided from the school files.
  - For many of the Parkside Secondary claims there were date discrepancies within individual documents with evidence that dates had been altered (whited out) and changed to a current date.
  - There was inconsistent use of the interagency planning form.
  - In some instances interagency planning coordination was not well documented.
  - The use of the Code H behaviour log was supportive of the evidence.
  - There was evidence of learning activities and methods of evaluation that supported the goals.
- Autism Spectrum Disorder files were clear, comprehensive and complete.
- The IEPs for Codes A to Code H were generally current.
- The level of service provided at the schools was clearly documented in the IEP.
- Code A to Code G files were complete and information was accessible except in some cases where assessment information was difficult to find.
  - Goals met the criteria in the category.
  - All files contained up to date IEPs.
  - Parent involvement was clearly indicated.
  - The organization of the files was comprehensive and readily accessible.
  - Requested evidence was provided in a timely manner.

- Some student files included information on other students. The files had documents pertaining to four or five students that may have been discussed at one meeting with the pediatrician.
- All files showed a variety of methods that were used to measure progress towards IEP goals and objectives.

### **Recommendations**

The auditors recommend that:

- The District ensure the assessment data supports the criteria for placement in each category.
- The District only claim students that meet the requisite reporting criteria in accordance with the Special Education Manual of Policies, Procedures and Guideline and ensure processes are in place for delisting students when they no longer meet category placement.
- The District ensure, for all their student claims, there is verifiable documentation that meets the corresponding criteria as specified in the Special Education Manual of Policies, Procedures and Guidelines.
- The District ensure that cognitive assessments are in place for all students reported in Code C.
- The District aid Parkside Secondary School with the organization of their Special Education files, ensuring all relevant information and documentation reflects category placement criteria.
- To maintain consistency in process with all other low incidence student claims, the District ensure all Code H student documentation supporting criteria is retained in the District binders.
- The District ensure that no student documentation is altered by any of the schools, including confirmation that dates are not changed in the files.
- The District ensure there is documentation in place to verify their due diligence obtaining or attempting to obtain required diagnosis for all low incidence student claims reported for Provincial funding.

### **Auditors' Comments**

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

**Funding & Compliance Branch  
Resource Management Division  
Ministry of Education  
March 6, 2013 – Revised May 30, 2013**