



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

2014/15 Special Education Enrolment Audit

AUDIT REPORT

REVISED JUNE 10, 2015

SCHOOL DISTRICT No. 20 (Kootenay–Columbia)

2014/15 SPECIAL EDUCATION ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 20 (Kootenay-Columbia)

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 2014/15 school year, school boards reported 25,615 students enrolled in the Level 1, 2, and 3 supplemental special education funding categories at October 2014. School District No. 20 (Kootenay-Columbia) reported 179 students in these supplemental special education funding categories as of October 17, 2014. For the purpose of this compliance audit, School District No. 20 (Kootenay-Columbia) reported four students in the Physically Dependent Category (Code A), two students reported in the Deafblind Category (Code B), 16 students in the Moderate to Profound Intellectual Disability Category (Code C), 36 students in the Physical Disability or Chronic Health Impairment Category (Code D), one student in the Visual Impairment Category (Code E), four in the Deaf or Hard of Hearing Category (Code F), 41 in the Autism Spectrum Disorder Category (Code G), and 75 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 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. 20 (Kootenay - Columbia) during the week of February 16, 2015.

An entry meeting was held on February 16, 2015 with the Superintendent, the Assistant Superintendent, Secretary Treasurer, Director of Human Resources, the Administrative Assistant and District Principal of Learning. Daily meetings with the District Principal of Learning were held 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 PowerPoint presentation of the District's processes and programs. The auditors were also given a book with information about SD20 (Kootenay–Columbia). The District has 3,700 students. Inclusion is a belief set rather than a place. The District outlined how service was delivered and explained some of the special programs. Outline of services and personnel services to schools were discussed. Declining enrolment is an issue. The District has closed half its schools. The District Principal of Learning requested the opportunity to provide information about the students in Code H.

A sample of four student files reported in the Physically Dependent (Code A), two student files in the Deafblind (Code B), 16 student files in Moderate to Profound Intellectual Disabilities (Code C), 36 student files in Physical Disability or Chronic Health Impairment (Code D), one student file in Visual Impairment (Code E), four student files in Deaf or Hard of Hearing (Code F), 41 student files in Autism Spectrum Disorder (Code G), and 75 student file 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 Principal of Learning requested the opportunity to share the following with the auditors before the team began the file reviews in Intensive Behavior Interventions/Serious Mental Illness (Code H):

- For younger students' case management responsibility is to the Student Support Teacher who works in conjunction with the Child Care Worker.
- Outside agency access is a challenge – a year and a half waitlist for CYMH.
- Students on critical incident care receive a great deal of service.
- Freedom Quest is a drug and alcohol counselling program (private and non-profit). There is also a related group program called RADD.
- KASPAR Trail community services is a support for low income families, but often families refuse to engage.
- As IHCAN is allowing Medical professionals to bill for attending meetings, more cross professional collaborations are taking place.

Although the file review process did not encounter issues requiring school visits, there were 75 students reported in the Intensive Behavior Interventions/Serious Mental Illness Category (Code H) that were reviewed. The file review process was difficult as many of the files had no description of the outside agencies and how the service was delivered. It was also challenging to find the intensity of the behaviour and the impact on the student functioning. Evidence of continuum of service from Behaviour Support or with Mental Illness (Code R) to Intensive Behaviour Interventions or Serious Mental Illness (Code H) was not evident. In the IEPs, especially for Code H, outside agency information was inconsistent.

An exit meeting was held with the Superintendent, Assistant Superintendent, Secretary Treasurer, Director of Human Resources and District Principal of Learning on February 20, 2015. 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 2014/15 school year and expressed appreciation for the assistance provided.

Observations:

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

- one student was recommended for reclassification to Code D
- one student was verified as not being totally dependent. Consideration for supports and service provisions for this student should be reviewed to identify if they meet requirements for another special education classification. **While not provided at the time of the audit, on June 8 2015 the District provided documentation supporting reclassification to Code D.**

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

Of the 16 student files reviewed by the auditors in Code C:

- one student was recommended for reclassification to Code K. The student had no assessment data for a Moderate to Profound Intellectual Disability classification. This was acknowledged and agreed to by the District staff.
- one student was recommended for reclassification to Code D. The student's assessment data aligned with this classification. The student has Downs Syndrome.

Of the 36 student files reviewed by the auditors in Code D:

- one student had moved out of the District and was without service provision evidence.
- two students were recommended for reclassification to Regular Education.
- one student was recommended for reclassification to Code H.

There was no recommended reclassifications for the one student file reviewed by the auditors in Code E.

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

There were no recommended reclassifications for the 41 student files reviewed by the auditors in Code G.

Of the 75 student files reviewed by the auditors in Code H:

- three students were recommended for reclassification to Code R.
- one student was recommended for reclassification to Code Q. Documented evidence was for Learning Disabilities.
- eight students were identified by the District as being claimed in error, without service provision and were reclassified to Regular Education.
- one student is being recommended for reclassification to Code R in September 2015, if evidence of behaviour intensity and IEP goals are not reviewed and determined to align with the Special Education Manual of Policies, Procedures and Guidelines for Code H.

The auditors found that:

- One student reported in Code A was verified as not totally dependent and is mobile. The evidence and support provision did not support placement in that category. **Post-audit the District provided documentation not available to the auditors during their on-site review. The evidence presented, as an appeal to the initial audit findings, supported reclassification to Code D.**
- One student reported in Code A had evidence to meet the criteria for Code D. Evidence in the student's file clearly aligned with supports and services requirements for the Physical Disability/Chronic Health Impairment classification. These findings were identified by the District staff.
- One student reported in Code C had an assessment placing the student in the borderline range. Evidence identified by the District staff supported placement in the Mild Intellectual Disability category (Code K).
- One student with assessment data verifying Downs Syndrome was recommended for reclassification to Code D from Code C.
- One student reported in Code D had moved out of the District. Without evidence of service provision this student claim was recommended to regular education.
- One student reported in Code D was verified by District staff as not seen since October 14, 2015. Without evidence of service provision at the Fall Collection date, this student claim was recommended to regular education.
- One student reported in Code D did not have evidence to support the category claim. It was verified student had not taken medication since 2012; no specialized support was provided as current teacher was not aware of special needs classification or of a medical condition that impacted learning; as well, IEP did not align with reported category criteria.
- One student reported in Code D had evidence to verify that diabetes was not seriously impacting education. Behaviour not the medical condition was having an impact on the student's education. There was supporting evidence of mental health services being provided that aligned with Code H.
- As verified by District staff, eight students reported in Code H were claimed in error. District was incorrectly under the assumption that the students had been removed from the Fall Data Collection.
- Three students claimed in Code H did not have evidence to meet the criteria for placement in the Intensive Behaviour Interventions/Serious Mental Illness Category. For these students, there was evidence to support placement in Code R.
- One student reported in Code H had evidence aligned with Learning Disabilities and was recommended for reclassification to Code Q.
- One student reported in Code H had an IEP that did not align with the criteria and required a re-evaluation. It was determined that the student remain in this classification until the end of the current school but be re-assessed in accordance with the Special Education Manual of Policies, Procedures and Guidelines to determine if supports and service requirements align with Intensive Behaviour Interventions/Serious Mental Illness (Code H), or Requiring Behaviour Support/Mental Illness (Code R).
- The files were very well organized with the exception of Code H which required additional effort on the part of the District staff and auditors to identify evidence to determine if requirements aligning with the category supports and needs were correctly identified and provided to the students.

- There were a number of forms, that when used, provided the evidence needed to confirm the student claims met the criteria. These included:
 - Planning Tool for Code D
 - Functional Behaviour Assessments
 - Behaviour Intervention Plan
 - Confirmation of services sheet
 - Functional assessment since Kindergarten-Parent/Guardian input
 - Student Technology Action Plan
 - Notes of meetings aided in identifying needs and provision of service.
- The goals in the IEP did not always match the Category. This was most prevalent during the review of the Code H files.
- In many instances, if not in the notes of meetings, it was difficult to find the amount of service specific to the student.
- In the IEPs for students in Code H, evidence of outside agencies and integrated case management was inconsistent. Outside agency support and collaboration was not well documented.
- Of the files reviewed in Code H, there was no evidence of continuum of service Code R to Code H in accordance with the Special Education Manual of Policies, Procedure and Guidelines.
- The IEPs were consistently signed even though this is not a requirement of the Ministry.
- There was consistent use of the Instructional Support Planning Document in Code D providing useful evidence needed for this category.
- All the student files reviewed in Code F contained evidence of well-defined services and programs as well as up to date assessments.
- Connors and BADC tests did not have summary statements or explanations by the person who distributed and scored the protocols. A print out is not sufficient. While both measures may be diagnostic, they are not definitive.
- Illegible signatures on reports did not aid in identifying the individual service providers.
- Time spent with students was missing from files.
- For students receiving physical therapy, the reports included photographs of students in wheelchairs as documentation to aid in verifying required supports.
- It was difficult to find the intensity of the behaviour and the impact on the student functioning.
- A description of outside agencies and service delivery would have aided the verification process.

Recommendations:

The auditors recommend that :

- 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 any 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 student claims in Code A 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.
- The District report only those student claims meeting the criteria for the category in which they are claimed and that they are receiving special education support services to address the needs identified in the assessment information that are beyond those offered to the general population.
- 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 these special education services are in evidence at the time of the required claim.
- The District ensure all student files have appropriate detailed assessments that support the recommendation of the student classification for the reported category in accordance with the Special Education Manual of Policy, Procedures and Guidelines.
- Documentation of the level and amount of service given to students be clearly recorded in the IEP.
- The District encourage consistent use of the various in-house forms and tools.
- The District ensure that all student files contain dated evidence supporting the placement of a student in a category.
- The District ensure that evidence of meeting minutes with participant involvement, copies of behavioural incidents, etc., appropriate to each category are available to support the reported placement including the identification of the roles and responsibilities of the various service providers.
- The District ensure all student claims are verified before reporting to the Ministry's Data Collection Branch.
- The District undertake a workshop and be considered for a return audit to ensure all related District staff are adhering to and working in accordance with the Special Education Manual of Policy, Procedures and Guidelines requirements.

Auditors' Comments

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