



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

**2015/16 Special Education Enrolment Audit**

**AUDIT REPORT**

**HERITAGE CHRISTIAN ONLINE SCHOOL  
(023 96738)**

## **2015/16 SPECIAL EDUCATION ENROLMENT AUDIT REPORT HERITAGE CHRISTIAN ONLINE SCHOOL (023 96738)**

### **Background**

The Ministry of Education funds Independent School Authorities based on the Authorities' reported enrolment as of September 30<sup>th</sup> each year and supplemental special needs classifications in September and February. Independent School Authorities report students with special needs to the Ministry on *Form 1701: Student Data Collection* (Form 1701).

In the 2015/16 school year, the Ministry of Education through the Office of the Inspector of Independent Schools (OIIS) conducted Special Education enrolment audits, in selected schools, to verify reported enrolment on Form 1701.

### **Purpose**

The purpose of the Special Education enrolment audit is to provide assurance to the Ministry of Education and Independent School Authorities that schools are complying with the instructions contained in [\*Form 1701: Student Data Collection, Completion Instructions for Independent 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 Compliance Audit Process**

A compliance audit was conducted at Heritage Christian Online School the week of March 14, 2016.

Prior to the file reviews, an entry meeting was held with School assigned staff and the audit team interviewed School administrators and staff to enquire about the Independent School Authority's policies, procedures and programs. The School shared documentation describing their Special Education Program and outlined the procedures and processes involved in the admission, program development and service delivery to students with special needs in both low and high incidence categories.

Heritage Christian Online School reported 282 students in special education categories at the Fall 2015 Form 1701 data submission. For the purposes of this audit, 259 student records were reviewed in the following low incidence special needs categories:

<b>Student Claims</b>	<b>Category</b>
6	Category A (Physically dependent)
1	Category B (Deaf/Blind)
6	Category C (Moderate to Profound Intellectual Disability)
95	Category D (Physical Disability or Chronic Health Impairment)
3	Category E (Visual Impairment)

<b>Student Claims</b>	<b>Category</b>
3	Category F (Deaf or Hard of Hearing)
123	Category G (Autism Spectrum Disorder)
22	Category H (Intensive Behaviour Intervention or Serious Mental Illness)

23 student records were also reviewed in the following high incidence special needs categories:

<b>Student Claims</b>	<b>Category</b>
2	Category K (Mild Intellectual Disability)
2	Category P (Gifted)
13	Category Q (Learning Disability)
3	Category R (Moderate Behavior Support/Mental Illness)

Prior to the audit being conducted at Heritage Christian Online School, the Lead Auditor contacted the School's Director of Special Education to ensure access to the data management systems would not create any challenges for the team when verifying criteria was being met for the upcoming compliance audit. The Director of Special Education sent several screencasts for the auditors to review and it was determined there should be no difficulty accessing the required evidence data.

In order to review the student files in the sample the auditors were introduced to the two data management systems used by Heritage Christian Online School. One system was Alfresco and the other FileMaker. All the required evidence data was available in these two systems. The School staff provided paper copies of the IEP, Report Card/Student Learning Plan and Student Budget Planner for each student claim being audited. After a brief tutorial the team was able to manoeuvre the systems and access the required evidence data.

The student files were very comprehensive. The evidence needed to verify the category claim was scanned and available. Evidence of the Ministry "Special Education Funding: Parent/Guardian Confirmation Form" was available for every student audited.

Any clarification requests were dealt with in a timely manner and contained the information the auditors were requesting. Meeting daily with the Director of Special Education and the Superintendent enabled the audit team to keep the school staff apprised of the audit progress.

The file review process encountered an issue requiring a meeting. There were several students diagnosed with either Complex Developmental Behaviour Condition (CDBC), Developmental Coordination Disorder (DCD), or Apraxia. The evidence in the student file did not support the complexity of the diagnosis on learning and achievement needed for an eligible claim in the Physical Disability or Chronic Health Impairment Category (Code D). Each area of concern was discussed. The opinion of the School was that, although they agreed with the auditors' review of CDBC and DCD, they felt that Apraxia being a motor disorder should meet the criteria for Code D. The auditors shared that under Ministry of Education guidelines Apraxia as a single diagnosis aligns with the criteria for classification in the Learning Disabilities Category (Code Q).

Clarification requests produced additional information that provided the auditors with evidence of the complexity for these students aligning with a Code D claim.

An exit meeting was held with the Superintendent, Director of Special Education, three Regional Administrators, Regional Administrator Assistant, LS/SE Graduation Administrator, LS K-9 Administrator, SE Finance Director, IT Support, KCCS Society Administrator on Friday March 18, 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, and reported there were no recommended reclassifications for the 2015/16 school year, and expressed appreciation for the assistance provided.

### **Observations**

- There were no recommended reclassifications for any of student files reviewed by the auditors in all the Special Education categories.

The auditors found that:

- The IEP format was developed in a manner that all information was readily available in the various sections of the IEP.
- All the IEPs were current and dated. There was a section of the IEP called the “IEP Handling Log” which recorded every time there was an action by staff involving the IEP. This included viewing, making additions or edits.
- Every IEP had evidence that the parent was involved in the creation of the IEP and its goals.
- There was a clear indication of who the service providers were and the role they played to support the student.
- There was evidence of significant amounts of supports and services being provided for the student files reviewed.
- The goals contained measurable objectives and indicated assessment of goal achievement.
- The goals were specific to the individual student and reflected the category in which they were claimed.
- The objectives were comprehensive and often reflected recommendations from various reports and assessments.
- For students in Grades 10 to 12 there was often a “Transition” goal that outlined the steps and resources available to the student as they planned to leave school. This goal often involved career exploration options.
- The IEPs all contained extensive information about School history, assessment history, medical history, present information which included “Health Concerns and Impact on Learning” as well as “Rationale for IEP”, “Specialized Programs/Resources and either an “Adaptations” or “Modifications” sheet (or both) specific to the student’s identified needs.
- The goals and objectives were set up in a very comprehensive manner which included: Area of Need, Current Level of Performance, Goal, Strategies/Resources/Support Services Provided, Specific Outcome/Objective, Strategy, Measure, Evaluation and Comments.
- The use of the Instructional Support Planning Document in various categories provided useful evidence needed to support the claim in that category.

## **Recommendations**

The auditors recommend that:

- The School 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 student's functioning and education must be significantly affected by his/her physical disability or chronic health impairment. The student with complex developmental behavior conditions, including FASD or Apraxia, exhibit an array of complex needs in two or more domains which significantly impact the student's education and achievement.
- The School encourage consistent use of the various in-house forms and tools including the Ministry developed Instructional Support Planning Tool.
- The School maintain the commendable level of service and documentation that was presented and identified during the audit.
- The School continue with the processes in place to meet the individual needs of the students.

## **Auditors' Comments**

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