



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

2015/16 Special Education Enrolment Audit

AUDIT REPORT

**Mennonite Educational Institute
(034 96020)**

2015/16 SPECIAL EDUCATION ENROLMENT AUDIT REPORT

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Background

The Ministry of Education funds Independent School Authorities based on the Authorities' reported enrolment as of September 30th 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 (OIIIS) 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 Mennonite Educational Institute (MEI) from February 15 to February 17, 2016.

Prior to the file reviews, an entry meeting was held with Mr. Vijay Manuel (newly appointed Head of the Mennonite Educational Institute (MEI) Schools), Principals and Learning Support Teachers of the Elementary, Middle and High Schools. Following introductions, the purpose of the audit was reviewed, the audit process was described and a tentative time for the exit meeting was discussed. The MEI staff provided a PowerPoint presentation to provide the audit team with an overview of student support at MEI schools. Information presented included their philosophy of Special Education, a description and organization of learning support, relevant school policies, service delivery, identification and designation process, admission and transition process, and related services for students with special needs. The organization and storage of Student Files were also described.

MEI reported 99 students in Special Education categories at the Fall 2015 Form 1701 data submission. For the purposes of this audit, 60 student records were reviewed in the following low incidence special needs categories:

Students Claimed	Category
5	Category C (Moderate to Profound Intellectual Disability)
24	Category D (Physical Disability or Chronic Health Impairment)
2	Category F (Deaf or Hard of Hearing)
10	Category G (Autism Spectrum Disorder)
19	Category H (Intensive Behaviour Intervention or Serious Mental Illness)

Heather Smith, Principal of the Middle School and Special Education Coordinator, was the key contact person throughout the audit and was able to provide the audit team with evidence or connect the audit team with the appropriate case manager when clarification was required. Short meetings at the end of each day with Special Education Coordinator and Head of Schools enabled the audit team to keep the School staff apprised of the audit progress.

An exit meeting was held with the Head of MEI Schools, Principals, and Learning Support Teachers of the Elementary, Middle and High Schools on February 17, 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, discussed reclassifications for the 2015/16 school year, and expressed appreciation for the assistance provided.

Observations:

There were no recommended reclassifications for the five student files reviewed by the auditors in Code C.

Of the 24 student files reviewed by the auditors in Code D:

- One student was recommended for reclassification to Code K.

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

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

Of the 19 student files reviewed by the auditors in Code H:

- Two students were recommended for reclassification to Code R.

The auditors found that:

- One student reported in the Physical Disability/Chronic Health Impair Category (Code D) had a dual diagnosis and meet criteria for both Code D and Autism Spectrum Disorder (Code G). It was verified that the IEP better reflected a Code G classification. Should the student who is currently in Grade 12 remain enrolled for another year, it is recommended that the student be reclassified to Code G.

- One student reported in Code D had assessment information from the Infant Clinic Multi-Disciplinary Team with no further assessment in the Student File. Follow up assessments/consultation should be pursued to support program planning.
- One student reported in Code D should be monitored and followed up with an OT assessment to determine if they continue to meet the criteria as outlined in the Special Education Manual of Policies, Procedure and Guidelines.
- One student reported in Code D had an assessment that did not support placement in the category as outlined in the Special Education Manual of Policies, Procedure and Guidelines. Documentation from the physician at Sunny Hill (July 2015) indicated that the student's cerebral palsy "*is at the most mild end of the spectrum...*" The program plan did not address the physical domain. There was no evidence of OT/PT involvement in the current program. There was evidence to support a placement in the Mild Intellectual Disability category (Code K).
- One student reported in Code D requires an updated assessment as suggested by the OT (2016) to confirm the developmental coordination disorder (DCD) diagnosis made in 2009.
- One student reported in Code G had a psychological evaluation by a qualified professional but did not clearly indicate consultation with professionals from other disciplines. It was suggested that the School have the Non-BCAAN (private) Diagnosis of Autism Spectrum Disorder form https://www.mcf.gov.bc.ca/autism/pdf/cf_0904.pdf completed by a qualified professional to ensure BCAAN policy standards and the Special Education Manual of Policies, Procedures and Guidelines are met prior to reporting in the subsequent school year.
- One student reported in Code H has significantly decreased behaviours that risk the safety of others. A current psychoeducational assessment supports placement in the Learning Disability Category (Code Q) in the 2016/2017 school year.
- One student reported in the Intensive Behaviour Interventions/Serious Mental Illness Category (Code H) did not have evidence to meet the criteria for placement in Code H as outlined in the Special Education Manual of Policies, Procedure and Guidelines. The program plan did not demonstrate provision of intensive intervention. Evidence supported the criteria aligned with the Moderate Behaviour Support category (Code R).
- One student reported in Code H did not have evidence to meet the criteria for placement in the Intensive Behaviour Interventions/Serious Mental Illness Category. Documentation only supported impact of behaviour in the School setting. All evidence met the criteria for placement in the Moderate Behaviour Support Category (Code R) in the 2015/16 school year. A norm referenced assessment or functional behavioural assessment to demonstrate the behaviour persists across settings is needed to maintain a Code R designation in 2016/2017.
- Student files were detailed and organized, although there was some redundant and unnecessary paperwork (i.e., student samples, class assessments, articles, etc.).
- There was evidence of regular communication and collaboration with parents.
- There was evidence of good collaboration, planning and communication within and amongst the elementary, middle and high schools.
- Transition planning from elementary to middle school and middle school to high school is very well organized to ensure success for students with special needs.
- The Special Education Funding: Parent/Guardian Confirmation Form was signed and included in all student files.
- Evidence of frequency and severity of behaviour was not always evident. Incidence reports were available in some instances.

- The medical diagnosis made by doctors and other specialists and the impact diagnoses on the student learning was not always supported by assessment information.
- Schools regularly sent letters addressed to doctors and other specialists requesting support for categorical designation or funding. This was especially apparent in files of students with Code D and Code H designation.
- Instructional Planning Tools were included in student files but were used inconsistently.
- Frequency and level of support from professionals (e.g., registered clinical counselor, OT/PT) were not always clearly indicated, which is significant for students with a Code H designation.
- IEP goals and objectives were not always measurable.
- Strategies and methods of evaluation/measuring progress were combined and not always clear or apparent (High School IEP template).

Recommendations:

The auditors recommend that:

- The Schools consider the reorganization of student file information (e.g., formal assessments) with non-relevant paperwork removed and placed in the Learning Resource Teacher's file.
- The School update assessments that support recommendations for the student in the reported category in accordance with the criteria outlined in the Special Education Manual of Policies, Procedure and Guidelines.
- There must be clear evidence of frequency and severity of behaviour before reporting student claims in the Code H category.
- As behaviour disorders vary in their severity and effect on learning, MEI consider using Moderate Behaviour Support (Code R) planning to better determine the level of behaviour and the progression of intensity for some students.
- Diagnosis of Autism Spectrum Disorder must be made by appropriately qualified professionals and meet BCAAN Standards and the Special Education Manual of Policies, Procedures and Guidelines.
- Medical diagnosis made by doctors and other specialists and the impact this diagnosis has on the student's learning, must be supported by assessment evidence.
- MEI schools refrain from encouraging medical professionals to state students meet criteria for categorical designations. Letters addressed to doctors and other specialist should request descriptive, diagnostic assessment/information.
- Instructional Planning Tools be used in their entirety as a helpful aid and be used as a functional behavioural assessment.
- Documentation of the frequency and level of service given to students be clearly recorded in the IEP.
- Goals and objectives are clear, measurable and in alignment with the category in which the student is identified.
- Strategies and Methods of Evaluation (methods for measuring progress) be clearly distinguishable as two separate elements of the IEP.
- The IEP outline the methods for measuring progress in relation to the IEP goals as stated in the Special Education Manual of Policies, Procedure and Guidelines.

Auditors' Comments

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