



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

2015/16 Special Education Enrolment Audit

AUDIT REPORT

**Oak and Orca Bioregional School
(061 96695)
and
Oak and Orca Distributed Learning School
(061 96745)**

2015/16 SPECIAL EDUCATION ENROLMENT AUDIT REPORT

Oak and Orca Bioregional and Oak and Orca Distributed Learning Schools

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 (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 Oak and Orca Bioregional School on February 25, 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.

Oak and Orca School reported 28 students in the special education categories and Oak and Orca Distributed Learning School reported seven students in the special education categories at the Fall 2015 Form 1701 data submission. For the purposes of this audit, 31 student records were reviewed in the following low incidence special needs categories:

Student Claims	Category
3	Category A (Physically dependent)
1	Category B (Deaf/Blind)
8	Category D (Physical Disability or Chronic Health Impairment)
17	Category G (Autism Spectrum Disorder)
2	Category H (Intensive Behaviour Intervention or Serious Mental Illness)

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

Student Claims	Category
4	Category Q (Learning Disability)

The School described unexpected growth in enrollment of special needs students and not having staff with special education expertise to help guide the Oak and Orca’s designation decisions. The School has recently written a policy to limit and improve management of the number of special education students enrolled. The School staff were able to provide the audit team with evidence when clarification was required.

The file review process encountered an issue the School will need to follow-up on before submitting next year’s Form 1701 claims. At the time of this year’s fall submission date, there was medical assessment in a student file supporting that the student was completely dependent on others for meeting all five daily living needs. The student was reported appropriately in Code A. A few days before the audit, the School received a physiotherapy report citing incredible progress, stating the student is walking consistently in their environment, and providing examples of mobility. The School team reports this mobility is with assistance and the physiotherapist reported inaccurately. The student is enrolled in Distributed Learning, so was not on premises for the audit team to visit. The School has been asked to provide further evidence confirming the School’s statement of the mobility level and the level of assistance required; otherwise, the student is not to be reported in Code A next year.

One Code G student claim did not have the full assessment within the file, only the summary page. The School states the administering B.C. Autism Assessment Network is no longer in operation and the School has not been able to secure a copy from the previous school. The School reports they are trying to obtain a copy. The School has been asked to request the parent secure and provide the assessment and then to follow-up with a PANTER or NON-BCAAN form.

An exit meeting was held with the Kara Woodcock (Principal), Kristine Peterson (teacher), Lindsey Graham-Carson (teacher), and Jeremy Hall (teacher), on February 25, 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 three student files reviewed by the auditors in Code A.

The one student file reviewed in Code B was recommended for reclassification to Code A.

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

- One student was recommended for reclassification to Code R.
- One student was recommended for reclassification to Code G.

There were no recommended reclassifications for the 17 student files reviewed by the auditors in Code G.

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

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

The auditors found that:

- At the Form 1701 Fall Student Collection date, one student reported in Code A showed evidence of meeting criteria as outlined in the Special Education Manual of Policies, Procedures and Guidelines; a recent report supports classification in a different category next year.
- For one Code D student recommended for reclassification, the evidence lacked a diagnosis to support the claim that the student has been appropriately assessed and identified for that category as outlined in the Special Education Manual of Policies, Procedures and Guidelines.
- For a Code D and Code B student recommended for reclassification, there is an equal amount of evidence in the student files to support placement in two different categories; present IEP goals and services aligned with the category reclassification recommendations.
- For two Code G student claims the audit team could confirm the diagnosis but not that the assessment adhered to the standards and guidelines for diagnosing Autism Spectrum Disorder. If either student is to be claimed next year, the full assessment for one student and a non-BCAAN form for both students must be in place by Fall Student Data Collection submission date.
- The student files were not well organized; noted subheadings were ordered differently in each file; and, data within the sections was often not reflective of the heading.
- The audit team was presented with the special education portion of the student file only.
- There was evidence of use of the Instructional Support Planning Document in a few Code D, Code G, and Code H student files.
- Therapy and educational assessments were not out-of-date. There were a number of recent therapy reviews within files.
- The level and frequency of service provided by the School was not identified in the IEP or within the student files.
- Not all files contained planned service provision at the 2015 Fall Data Collection date (September 30th).
- A variety of services relating to needs were contracted. Not all services were proportionate to the needs of the students.
- The auditors saw evidence of the School documenting when the Distributed Learning parents turned down a service.
- Documentation of Student Educational Assistant (SEA) support in the Distributed Learning and the Bioregional School IEPs was inconsistent. In the Bioregional School setting, SEA

support is provided through extra staff assigned to the class grouping. Oak and Orca stated their philosophy is not to have one-to-one support.

- There was supporting evidence of planning coordination across agency and community services for the students in Code H.
- The School's new IEP format conforms to conventional headings and contains required elements, other than frequency of services.
- The IEP goals for all category students are consistently written to reflect the individual needs of each student.
- There was no set order or domain grouping of the goals. Grade and age of the student are not included on the IEP, only birthdate.
- Not all IEP goals are specific or measurable.
- Many IEPs reflected strategy and goal recommendations from various assessment and therapeutic progress reports.
- Case notes and goal reviews are attached as part of the IEP.
- The team members' proper names and roles are provided at the front of the IEP, yet discerning who is responsible for carrying out the goals was not easily identified as often only first names were listed and/or additional or different names were indicated.

Recommendations:

The auditors recommend that:

- The School ensure the questionable student claim in Code A has evidence of clarifying assessment documentation verifying complete dependency on others for meeting all major daily living needs, in accordance with the Special Education Manual of Policies, Procedures and Guidelines, otherwise the student is not to be claimed in this category next year.
- 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 School acquire and confirm the the full assessment document missing in one Code G file.
- The non-BCAAN/PANTER form must be in place for two Code G students, if they are to be reported in this category next year.
- A protocol be established for organizing all student files.
- The School review IEPs and rewrite goals and objectives that are not specific and measurable.
- In all IEPs, methods for measuring progress are to be consistently included.
- The School consider grouping and ordering types of IEP goals, and listing age or chronological grades on the IEP.
- The School report only student claims in each category when a plan for the delivery of special education services is in evidence at the time of the claim.
- IEPs clearly document the level, frequency, and duration of services.
- Services be reviewed to ensure they are proportionate to the needs of students.
- The School develop a standard for recording service providers, e.g. full name and role.

- The School follow the directives of the Special Education Manual of Policies, Procedures and Guidelines for designating students.
- The School undertake a workshop to ensure all related staff understand the designation process in accordance with the Special Education Manual of Policy, Procedures and Guidelines requirements.

Auditors' Comments

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