



**Ministry of Education  
Resource Management and Corporate Services Division  
School District Financial Reporting Unit**

**2016/17 Special Education Enrolment Audit**

**AUDIT REPORT**

**SCHOOL DISTRICT No. 27 (Cariboo-Chilcotin)**

## **2016/17 SPECIAL EDUCATION ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 27 (Cariboo-Chilcotin)**

### **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 2016/17 school year, school boards reported 28 048 students enrolled in the low incidence supplemental special education funding categories at September 2016. School District No. 27 (Cariboo-Chilcotin) reported 195 student claims in the supplemental special education funding categories as of September 30, 2016. For the purpose of this compliance audit, School District No.27 (Cariboo-Chilcotin) reported four student claims in the Physically Dependent Category (Code A), 22 student claims in the Moderate to Profound Intellectual Disability Category (Code C), 57 student claims in the Physical Disability or Chronic Health Impairment Category (Code D), two student claims in the Visual Impairment Category (Code E), 13 student claims in the Deaf or Hard of Hearing Category (Code F), 56 student claims in the Autism Spectrum Disorder Category (Code G), and 41 student claims 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 are receiving the service and have been placed in the appropriate special education category, as per the [\*Special Education Services: A Manual of Policies, Procedures and Guidelines \(April 2016\)\*](#).

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

A Special Education enrolment audit was conducted in School District No. 27 (Cariboo-Chilcotin) during the week of February 20, 2017.

An entry meeting was held on February 20, 2017 with the Acting Superintendent and the Director of Instruction. Daily meetings with the Director of Instruction were held to present preliminary findings and to seek clarification related to the contents of files.

A sample of four student files reported in the Physically Dependent category (Code A), 22 student files in Moderate to Profound Intellectual Disabilities (Code C), 57 student files in Physical Disability or Chronic Health Impairment (Code D), two student files in Visual Impairments (Code E), 13 student files in Deaf or Hard of Hearing (Code F), 56 student files in Autism Spectrum Disorder (Code G), and 41 student files 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.

An exit meeting was held with the Director of Instruction and the Acting Superintendent on February 24, 2017. 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 2016/17 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 G.

Of the 22 student files reviewed by the auditors in Code C:

- one student was recommended for reclassification to Code D.

Of the 57 student files reviewed by the auditors in Code D:

- two students were recommended for reclassification to Regular Education

There were no recommended reclassifications of the files reviewed by the auditors in Code E, Code F and Code G.

Of the 41 student files reviewed by the auditors in Code H:

- one student was recommended for reclassification to Code R.

The auditors found that:

- All the files were well organized in file cabinets by category and alphabetically by student last name to allow easy access.
- The content of all files was consistently organized by section and were clearly labelled. The sections included: Summary Concerns, Designation Forms, Medical/Audiological Forms, Assessment Information, Inter-Agency Log, School Team Meetings, Schedules / Timetables and IEPs.
- The IEP template used for all IEPs was clear and contained all requirements of an IEP in accordance with the Ministry directives.
- For the majority of student claims there was evidence of goals corresponding to the category in which the student was reported and there was evidence in most files that identified students are receiving services beyond that of the general student population.
- The IEPs for most students in all categories were consistently written to reflect the specific needs of the individual student.

- One student claim did not have evidence to meet criteria for placement in the Physically Dependent Category (Code A). Evidence confirmed the student did not require assistance at all times for all major daily living needs as outlined in the Special Education Services Manual of Policies, Procedures and Guidelines. The student was previously reported in the Autism Spectrum Disorder category (Code G) by another School District. A diagnosis of Autism Spectrum Disorder made by the B.C. Autism Assessment Network (BCAAN) dated October 13, 2011 was in evidence. It was verified the criteria was met for placement in the Autism Spectrum Disorder category (Code G).
- One student claim in the Moderate to Profound Intellectual Disability category (Code C) was without evidence to meet criteria for placement in Code C. Assessment documentation does not confirm the student's intellectual functioning is three standard deviations below the mean on an individually administered Level C assessment of intellectual functioning in accordance with the Special Education Services Manual of Policies, Procedures and Guidelines criteria for that category. Student has a diagnosis of Down Syndrome with documented evidence supporting the Physical Disability/Chronic Health Impairment category (Code D).
- One student claim for Code D does not have evidence to support a medical diagnosis aligned with this category. A psychology assessment report from Sunnyhill Health Centre for Children dated February 2012 indicated the student had been experiencing seizures in 2011 but the seizures were effectively controlled with medication since early 2012. There was no evidence the student's functioning and education has been significantly affected. It was confirmed by the District staff that additional documentation is required before reporting the student in any supplemental education category. It was indicated that arrangements had been made for the student to undergo an assessment at B.C. Children's Hospital to determine if there is a requirement for special education services in the future.
- There was no current evidence to support placement for a student reported in Code D. The Grade 10 student arrived at the School District in September 2016 with Type 1 diabetes. The Cariboo-Chilcotin District staff retained the student's classification based on a prior designation from another District. It was verified that the student was in good control of his diabetes with functioning and education not significantly affected, nor was the student receiving special education services that were beyond those offered to the general student population.
- One student claim reported in Code H did not have evidence to meet the criteria for placement in the Intensive Behaviour Interventions/Serious Mental Illness category. The student does work with a Youth Care Worker once a week in a small group setting for help with self-regulation and friendship skills however, the Youth Care Worker is a district employee. There is no evidence of coordinated across-agency planning and/or community services and therefore this student does not meet criteria for Code H. He does meet criteria for Code R. It is recommended that he be moved to Students Requiring Behaviour Support or Students with Mental Illness (Code R).
- A student claim in the Autism Spectrum Disorder category (Code G) had evidence of conflicting information. The school-based team notes from February 19, 2013 and December 4, 2014 identified that the student be declassified for special education services. The September 29, 2015 IEP identified student being medicated for ADHD and working at grade level in all subjects with reference that the Learning Resource Teacher was available as required. The October 2016 IEP as first presented by the District staff had very little information to support special education services: indication the student can no longer

tolerate medication and is no longer taking it; there was no information under the Needs and Challenges segment; and, indication student was working one year behind his peers. After reviewing the available information, the Director of Instruction was asked by the audit team for evidence as to how the disability currently impacts the student's progress at school. A revised IEP with additional information including further goals and objectives and strategies addressing the student's identified needs was presented. The revised IEP evidence minimally meet the criteria for Code G. In this instance only, based on the requirement that the District staff ensure appropriate evaluation be undertaken for this student and any special education classification assigned must align with the Special Education Services Manual of Policies, Procedures and Guidelines documentation requirements, no reclassification was recommended.

- It was noted that the IEPs had individualized goals but many did not have measurable objectives.
- Many requests were made for required information that was missing in the files, particularly in the Intensive Behaviour Interventions/Serious Mental Illness Category (Code H).
- The Instructional Support Planning Tools included in some files to support student placement were not used consistently.
- Many of the IEPs did not have a specific date but only the school year (2016-2017).
- For many students claimed in Intensive Behaviour Interventions/Serious Mental Illness (Code H), the inter-agency form was useful providing evidence that planning was coordinated across agency and community.
- It was difficult to determine the nature and level of support services provided to the student.
- In some instances the goals did not correspond to the category in which the student was reported.

### **Recommendations:**

The auditors recommend that:

- 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 that the student requires assistance at all times for feeding, dressing, toileting, mobility and personal hygiene, in accordance with the Special Education Service Manual of Policies, Procedures and Guidelines.
- The District report student claims in Code C only when the Special Education Manual of Policies, Procedures and Guidelines criteria listed that category is met. Assessment documentation must indicate that the student's intellectual functioning is three or more standard deviations below the mean on an individually administered Level C Assessment and assessment documentation must show there are limitations of a similar degree in two or more adaptive skill areas.
- The District ensure student claims in Code D meet the Special Education Service Manual of Policies Procedure and Guidelines criteria 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 H include evidence that planning is coordinated across agency and community as specified in the Special Education Service Manual of

Policies, Procedures and Guidelines. There must be an IEP in place dated after September 30<sup>th</sup> of the previous school year and the students must be receiving additional services.

- The District ensure that, prior to the next Fall Data Collection period, all student claims for supplemental special education funding (including the one Code G student without evidence of servicing per the initial IEP presented as evidence) must have evidence of comprehensive assessment information to support placement and that there are individualized goals and measurable objectives with adaptations and/or modifications and strategies to meet the goals. These students must also be receiving special education services to address their needs as identified in the assessment information that are beyond those offered to the general student population and are appropriate to the student's level of need.
- The Instructional Support Planning Tools be used in their entirety. In doing so, these are effective assessments to assess the current level of performance, support student placement in a special education category and to guide interventions. These can also be used as a functional behavioural assessment.
- The Inter-agency Form be completed for every student reported in Code H as evidence of coordinated, across-agency planning for individual students.
- The IEPs include clear evidence that support services that are provided to the student address student need and are beyond those offered to the general student population.
- IEPs in all categories must have individualized goals and measurable objectives as outlined in the Special Education Service Manual of Policies, Procedures and Guidelines.
- The District ensure that the student goals and objectives address the specific needs of the student as identified in the assessment documentation.
- The District ensure that each student file contains the required information as evidence that the student meets all criteria for placement in the special education category as outlined in the Special Education Manual of Policies, Procedures and Guidelines for that category.
- The District ensure that IEPs are fully dated as verification evidence the relevant IEP represents the Fall Data Collection claims as well as meeting the Form 1701 requirement that there is a current IEP dated after September 30<sup>th</sup> of the previous school year.
- The District ensure that Form 1701 reporting is verified prior to submission and that student files are updated and reviewed regularly to ensure the student claims meet the criteria in the category in which they are claimed for the reported school year.

### **Auditors' Comments**

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