



**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. 37 (Delta)**

## **2016/17 SPECIAL EDUCATION ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 37 (Delta)**

### **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. 37 (Delta) reported 1,012 student claims in the supplemental special education funding categories as of September 30, 2016. For the purpose of this compliance audit, School District No. 37 (Delta) reported six student claims in the Physically Dependent Category (Code A), three student claims reported in the Deafblind Category (Code B), 62 student claims in the Moderate to Profound Intellectual Disability Category (Code C), 296 student claims in the Physical Disability or Chronic Health Impairment Category (Code D), ten student claims in the Visual Impairment Category (Code E), 37 student claims in the Deaf or Hard of Hearing Category (Code F), 207 student claims in the Autism Spectrum Disorder Category (Code G), and 391 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. 37 (Delta) during the week of March 6, 2017.

An entry meeting was held on March 6, 2017 with the Superintendent, Assistant Superintendent and the Director of Learning Services-Inclusive Education. At the entry meeting the Director of Learning Services-Inclusive Education presented an 'Inclusive Learning' overview.

The file review process did not encounter issues requiring school visits. Daily meetings with the Director of Learning Services-Inclusive Education enabled the audit team to keep the District staff apprised of the audit progress, to present preliminary findings and to seek clarification related to the contents of files.

A sample of six student files reported in Physically Dependent (Code A), three student files in Deafblind (Code B), 15 student files in Moderate to Profound Intellectual Disabilities (Code C), 100 student files in Physical Disability or Chronic Health Impairment (Code D), ten student files in the Visual Impairment Category (Code E), 30 student files in Deaf or Hard of Hearing (Code F), 20 student files in Autism Spectrum Disorder (Code G), and 150 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.

The files were readily accessible. The auditors were provided with individual binders that listed: schools, community agencies (supports and services), district based supports, services, programs, school based supports and services.

An exit meeting was held with the Superintendent, Assistant Superintendent and the Director of Learning Services-Inclusive Education on March 10, 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:**

There were no recommended reclassifications for the student files reviewed by the auditors in Code A, Code C, Code E, Code F, and Code G.

Of the 3 student files reviewed by the auditors in Code B:

- one student was recommended for reclassification to Code E

Of the 100 student files reviewed by the auditors in Code D:

- one student was recommended for reclassification to Code Q.
- two students were recommended for reclassification to Code R.

Of the 150 student files reviewed by the auditors in Code H

- one student was recommended for reclassification to Code R.
- two students were recommended for reclassification to Regular Education.

The auditors found that:

- For the Physical Disability or Chronic Health Impairment Category (Code D) and the Intensive Behaviour Intervention/Serious Mental Illness Category (Code H) student evidence identified:
  - a large number of files did not contain documentation to support the designation;
  - the file content did permit ease of access to pertinent information;

- there was inconsistent use of the Instructional Planning Tool with the summary page not reflecting the complexity of the domains.
- In Code D, the dates of medical documentation were not always evident.
- The IEPs in all categories:
  - were dated 2016-2017 rather than a specific date resulting in difficulties determining when the IEP was done.
  - did not document methods for measuring progress in relation to the IEP goals.
  - did not include EA support times/schedules.
- The 2016/17 Form 1701 Instructions identify that in addition to the requirement that a student has been appropriately assessed and identified by the Board of Education as meeting the criteria according to the definition, identification and service delivery in the Special Education Services Manual of Policies, Procedures and Guideline, the following criteria must be met before identifying a student in a special needs category:
  - ✓ a current IEP must be in place dated after September 30<sup>th</sup>, 2015;
  - ✓ the goals of the IEP must correspond to the category in which the student is identified;
  - ✓ support services must be outlined in the IEP and must be related to the student's identified need(s);
  - ✓ there must be evidence that a parent has been offered the opportunity to be consulted about the preparation of the IEP;
  - ✓ there must be evidence that the student is being offered learning activities in accordance with the IEP developed for the student;
  - ✓ and the IEP must outline methods for measuring the student's progress in relation to the IEP goals.
- One student claim was recommended for reclassification from Code B to Code E. The Deafblind Category (Code B) per the Special Education Services Manual of Policies, Procedures and Guidelines requires medical documentation that the student's vision is impaired and that the student's hearing is impaired (from moderate to profound hearing loss). There was no evidence of medical documentation for hearing impairment. The auditors were advised that District staff continually requested updated hearing assessments from the family without success. There was evidence the school-based case manager made a hearing assessment referral to the Fraser Health Authority. There was medical documentation of retinal dystrophy which meets the criteria for the Visual Impairment Category (Code E). The current IEP contained goals that corresponded to the needs of students identified in Code E.
- One student claim was recommended for reclassification from Code D to Code Q. Evidence did not indicate an array of complex needs. The student had a medical diagnosis of ADHD and a psycho-educational assessment documenting a Learning Disability. There was evidence in the file of a possibility of DCD (Developmental Coordination Disorder), however, there was no consultation with multidisciplinary team to confirm a diagnosis. The Instructional Planning Tool did not indicate any areas of complexity in any domains. The IEP in the student's file reflected goals which supported reclassification to the Learning Disabilities category (Code Q).
- Two students were recommended for reclassification from Code D to Moderate Behaviour Support/Mental Illness (Code R).
  - One student was diagnosed in 2008 with Pelvic Floor Dysfunction. There was no evidence that the student's functioning and education was impacted by the chronic health impairment. The student's current IEP did not include any goals/objectives related to

personal care. The IEP listed two goals related to anxiety and depression (“Will continue to manage...”) aligned with Code R. There was no indication of a formal medical diagnosis or evidence of significant impacts on the student’s functioning and education. The August 2013 letter from the Pediatrician identified that there was no formal diagnosis.

- One student was reported because of a diagnosis of a Global Developmental Delay. The assessment which was done in 2014, by BCAAN, indicated that the student was ‘at risk’ for an Intellectual Disability, ADHD and Learning Disabilities. A subsequent pediatric assessment (June 2016) suggested that the school district consider an updated psychoeducational assessment. There was no evidence in the student’s file or IEP to indicate an array of complex needs or supports required to meet the criteria for Code D. The IEP goals did align with Code R.
- Two students were recommended for reclassification from Code H to Regular Education.
  - There was no evidence of service or of an IEP dated after September 30, 2015.
- For one student reported as Code H there was no evidence of a behavioural assessment or a mental health assessment required in accordance with the Special Education Services Manual of Policies, Procedures and Guidelines. The current IEP goals aligned with Code R.

### **Recommendations:**

The auditors recommend that:

- The District ensure that Form 1701 reporting is verified prior to submission and that student files are updated and reviewed regularly to ensure the students meet the criteria in the category in which they are claimed for the reported school year.
- The District work to ensure required evidence is consistent amongst District schools.
- The District ensure student claims in Code D meet the criteria listed in the Special Education Services Manual of Policies Procedure and Guidelines for that category. There must be documentation of a medical diagnosis, with the date provided, 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 including those in Code H have an IEP in place dated after September 30<sup>th</sup> of the previous school year and that the students must be receiving additional services aligned with the requirements per the Special Education Services Manual of Policies, Procedures and Guidelines.
- The District ensure the diagnosis meets the criteria aligned with the designation.
- The District ensure the medical information regarding the students claimed is current and that processes are in place for declassifying students when they no longer meet category placement.
- The District ensure that the IEP is accurately dated (day/month/year) and that there is a process for measuring progress in relation to the IEP goals.
- The District ensure that there is documentation of the level of support that a student with special needs is receiving.
- The District encourage wide-spread use of instructional planning tools.

### **Auditors' Comments**

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