



**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. 38 (Richmond)

2016/17 SPECIAL EDUCATION ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 38 (Richmond)

Background

The Ministry of Education funds boards of education based on the boards' reported enrolment as of September 30th 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. 38 (Richmond) reported 702 student claims in the supplemental special education funding categories as of September 30, 2016. For the purpose of this compliance audit, School District No.38 (Richmond) reported 13 student claims in the Physically Dependent Category (Code A), two student claims reported in the Deafblind Category (Code B), 26 student claims in the Moderate to Profound Intellectual Disability Category (Code C), 191 student claims in the Physical Disability or Chronic Health Impairment Category (Code D), eight student claims in the Visual Impairment Category (Code E), 44 student claims in the Deaf or Hard of Hearing Category (Code F), 310 student claims in the Autism Spectrum Disorder Category (Code G), and 108 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. 38 (Richmond) during the week of January 8, 2017.

An entry meeting was held on January 8, 2017 with the Superintendent, two Assistant Superintendents, the Director of Instruction-Learning Services and the District Administrator-Learning Services. Prior to the file reviews, the auditors reviewed the purpose and process of the

audit. The Director of Instruction presented a very informative Power Point presentation providing an overview of the District, the unique features, challenges and future directions. 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 13 student files reported in the Physically Dependent category (Code A), two student files in the Deafblind (Code B), ten student files in Moderate to Profound Intellectual Disabilities (Code C), 100 student files in Physical Disability or Chronic Health Impairment (Code D), eight student files in Visual Impairments (Code E), 20 student files in Deaf or Hard of Hearing (Code F), 50 student files in Autism Spectrum Disorder (Code G), and 100 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 file review process did not encounter issues requiring school visits. The Director of Instruction was able to provide the audit team with evidence when clarification was required. Meeting daily with the Director of Instruction enabled the audit team to keep the District staff apprised of the audit progress.

An exit meeting was held with the Superintendent, the Assistant Superintendent, the Director of Instruction-Learning Services and the District Administrator-Learning Services on January 13, 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:

All 13 student files reviewed by the auditors in Code A were appropriately designated and reported in this Category.

Both student files reviewed by the auditors in Code B were appropriately designated and reported in this Category.

Of the 10 student files reviewed by the auditors in Code C:

- two student claims were recommended for reclassification to Code D.

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

- three student claims were recommended for reclassification to Regular Education.

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

- One student claim was recommended for reclassification to Regular Education.

Of the 20 student files reviewed by the auditors in Code F:

- One student claim was recommended for reclassification to Regular Education.

All 50 student claims reviewed by the auditors in Code G were appropriately designated and reported in this Category.

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

- one student claim was recommended for reclassification to Code D.

The auditors found that:

- Missing evidence was sought after and delivered to the team in a timely manner.
- The format of some IEPs made it challenging to determine if the goals and objectives were being met.
- Many of the IEPs did not have individualized goals and measurable objectives or strategies to meet the goals.
- Many of the IEPs did not include what specialized services were provided to address the needs of the student that are beyond those offered to the general population.
- Evidence in the files was not always readily available, due to the following:
 - Many forms were not consistently filled out or complete.
 - There are different formats of IEPs in use throughout the District and completed to varying degrees of detail.
 - Forms were not always dated and often did not specify the role or responsibility of the person(s) listed on them.
- It was often difficult to determine if the parents were involved and /or offered the opportunity to be consulted about the preparation of the IEP.
- It was often difficult to find information in the file to support placement in the Intensive Behaviour Interventions/Serious Mental Illness Category (Code H).
- The Instructional Support Planning Tools were included in most Code H files, often with minimal levels of completion and with little evidence that these were being used to guide intervention. The Instructional Support Planning Tool was often used as the Functional Behaviour Assessment and the sole behavioural assessment in the file to meet criteria. The entire form was rarely completed and the results intended to inform practice were generally not incorporated in the student's IEP.
- Two students did not have evidence to meet the criteria for placement in Moderate to Profound Intellectual Disabilities (Code C).
 - Evidence verified that one student claimed in Code C had a mild intellectual disability (cerebral palsy and a language disorder). A checklist was completed for Code D by District staff with a note indicating that the student was claimed in error for Code C and should have been claimed in the Physical Disability/ Chronic Health Impairment Category (Code D). It was confirmed that the evidence supported placement in Code D.
 - One student had a diagnosis of Down's Syndrome. There was no evidence of assessment documentation verifying the student's intellectual functioning was three or more standard deviations below the mean on a individually administered Level C assessment of intellectual functioning, nor was there assessment documentation showing there were limitations of a similar degree in two or more adaptive skill areas on a norm referenced measure of adaptive behaviour. It was verified that the student did have needs in the five domains of academic/intellectual, social emotional, self-determination/independence,

- physical functioning and communication. There was a student safety plan and the current IEP had goals, objectives and services supporting placement in Code D.
- Three student claims did not have evidence to meet criteria for placement in the Physical Disability/Chronic Health Impairment Category (Code D).
 - One student was diagnosed with Marfan's Syndrome in 2009 impacting bones, heart and one eye. The student was reported in Code D but was verified as not receiving special education services to address the identified needs beyond those offered to the general student population. The District staff agreed that student be delisted to regular education.
 - One student was claimed in Code D due to diabetes and a recent neck injury. Evidence identified that the student self-manages their diabetes and the neck injury is managed with medication. There was no current IEP in place nor evidence the student received special education services to address the needs that are beyond those offered to the general student population. No evidence was found to support a placement in this or any other special education category.
 - One student with a diagnosis of Selective Mutism had refused services. There was no evidence the condition seriously impacted the student's education nor any evidence found to support a placement in this or any other special education category.
 - One student reported in the Visual Impairment Category (Code E) was claimed in error. There was evidence of an IEP and services for the 2015/16 school year but were discontinued. A qualified Teacher of the Visually Impaired no longer provided service, nor was there evidence of special education services to support placement in this or any other special education category.
 - For one student claimed in the Deaf or Hard of Hearing Category (Code F), it was verified that the last IEP was for the 2012/2013 school year. Additionally, it was confirmed that student was not provided with any additional services beyond that of the general student population.
 - It was confirmed by District staff that one student reported in the Intensive Behaviour Interventions/Serious Mental Illness Category (Code H) was claimed in error. Evidence was identified to support placement in the Physical Disability/Chronic Health Impairment Category (Code D).

Recommendations:

The auditors recommend that:

- The District report student claims in Code C only when the Special Education Services Manual of Policies, Procedures and Guidelines for that category are met. Ensure assessment documentation shows the student's intellectual functioning in three or more standard deviations below the mean on an individually administered Level C Assessment and assessment documentation identifies 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 Services Manual of Policies Procedure and Guidelines for the 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 that for Code E supplemental claims, the student needs continue to require support from the Teacher of the Visually Impaired and that the services received by the student are beyond those offered to general student population and align with the Special Education Services Manual of Policies, Procedures and Guidelines.
- The District ensure that students reported in Code F receive regular and ongoing special education services from a Teacher of the Deaf and Hard of Hearing in accordance with the Special Education Services Manual of Policies, Procedures and Guidelines.
- 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.
- Processes are in place for declassifying students when they no longer meet category placement.
- The District continue to move toward developing an IEP template that aligns with the [Individual Education Plan Order](#).
- All IEPs have individualized goals and measurable objectives and strategies to meet the goals.
- The District ensure that all designated special education students receive additional special education services beyond that of the general student population.
- Forms are complete and dated, and names and responsibilities of personnel involved are listed on all the supporting documents.
- The District develop a consistent method of recording parent involvement.
- Staff responsible for student designation in Code H ensure the evidence supports the required severity of behaviour which is persistent over time and is included in each file.
- The Instructional Support Planning Tool be completed and the information derived from the assessment be used to develop goals and measurable objectives specific to individual student need.
- If the Instructional Support Planning Tool is used as the sole assessment tool for qualification in Code H, the results of the assessment must be complete and the severity of student behaviour must be reflected in the results of the assessment.

Auditors' Comments

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