



**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. 84 (Vancouver Island West)

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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. 84 (Vancouver Island West) reported 87 student claims in the supplemental special education categories as of September 30, 2016. For the purpose of this compliance audit, School District No. 84 (Vancouver Island West) reported five student claims in the Moderate to Profound Intellectual Disability Category (Code C), 15 student claims in the Physical Disability or Chronic Health Impairment Category (Code D), five student claims in the Deaf or Hard of Hearing Category (Code F), four student claims in the Autism Spectrum Disorder Category (Code G), 11 student claims in the Intensive Behavior Intervention/Serious Mental Illness Category (Code H), ten student claims in the Mild Intellectual Disabilities Category (Code K), one student claim in the Gifted Category (Code P), 32 student claims in the Learning Disabilities (Code Q), four student claims in the Moderate Behaviour Support/Mental Illness Category (Code R).

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. 84 (Vancouver Island West) during the week of March 13, 2017.

The District had requested extra time to prepare for the audit with the inclusion of 47 high incidence files (Codes K, P, Q and R) due to the remote and extended locations of each school

throughout the District and related file transfer issues these locales could incur. The Ministry advanced the date of the audit by five weeks to enable files to be collected and compiled.

An entry meeting was held on March 13, 2017 with the Superintendent/Secretary Treasurer, and the District Principal. Prior to the file reviews, the auditors reviewed the purpose and process of the audit.

On the first day, the District Principal assisted in clarifying the processes in student identification and service delivery in the various schools. The Alternate Education Program School (Tsawalk Learning Centre) in Nanaimo, for at-risk students who had previously not been attending school, was also described.

An afternoon meeting with the District Principal was held on March 13, 2017 to present preliminary findings and to seek clarification related to the outstanding verification requests. There was no afternoon summary on March 14 as the District Principal was off site in Tahsis.

The District Principal was not on site for two of the three days of the audit. The Occupational Therapist undertook their annual visit to the District during the same week as the compliance audit. Due to the absence of the District Principal all requests for clarifications or additional evidence was provided to school clerical staff. The clerical staff faxed the audit team's requests to the District Principal's locale. This process was unexpected, time consuming and delayed the required verifications needed to enable the audit team to undertake their assigned duties.

A sample of five student files in Moderate to Profound Intellectual Disabilities (Code C), 15 student files in Physical Disability or Chronic Health Impairment (Code D), five student files in Deaf or Hard of Hearing (Code F), four student files in Autism Spectrum Disorder (Code G), 11 student files in Intensive Behavior Interventions/Serious Mental Illness (Code H), ten student files in Mild Intellectual Disabilities (Code K), one student file in Gifted (Code P), 32 student files in Learning Disabilities (Code Q), and four student files in Students Requiring Behaviour Support or Students with Mental Illness (Code R) special needs categories were reviewed and evaluated to determine if the students in these categories were accurately reported on Form 1701.

The student files were located in an unused classroom in Ray Watkins Elementary School which the auditors worked out of. The files were organized in boxes by school and by category and in alphabetical order which allowed easy access to the student information.

Despite the large geographical area of the District, evidence indicated students designated in low incidence categories were able to receive services from contracted specialist teachers through the use of technology. As an example: the Teacher of the Deaf and Hard of Hearing used Medeo Teletherapy to provide weekly services at a distance.

The afternoon of March 15, 2017 an exit meeting was conducted over speaker phone with the District Principal who was in Zeballos. The Superintendent was out of the District. At the exit meeting 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 any assistance provided.

Observations:

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

Of the 11 student files reviewed by the auditors in Code H:

- five students were recommended for reclassification to Regular Education.

Of the ten student files reviewed by the auditors in Code K:

- two students were recommended for reclassification to Regular Education.

Of the 16 student files reviewed by the auditors in Code Q:

- four students were recommended for reclassification to Regular Education.
- one student was recommended for reclassification to Code K.

Of the 4 student files reviewed by the auditors in Code R:

- one student was recommended for reclassification to Regular Education.

The auditors found that:

- The Instructional Support Planning Tool was included in some files but not consistently and most were not completed.
- The content of low incidence student files was organized and comprehensive.
- The high incidence student files were not as well-organized resulting in many requests for missing information through the compliance audit clarification process. Many of the IEPs had conflicting dates. The District Principal informed the audit team that no advanced review of the high incidence files was undertaken.
- Five student claims did not have evidence to meet the criteria for placement in Students Requiring Intensive Behaviour Interventions or Students with Serious Mental Illness (Code H). All of the student files were from Tsawalk Learning Centre in Nanaimo.
 - Initially there was no evidence of any documentation for a student. Upon clarification, a file was provided but there was no current IEP in place dated after September 30, 2015. The District Principal advised that the school used a sheet entitled “*Goals and Life Aspirations*” as the student’s IEP. This document does not have any of the components that the required IEP must contain. There was no evidence to verify the student met the criteria for the category claimed.
 - Initially there was no evidence of any documentation for a student. When documentation was provided, there was no current IEP dated after September 30, 2015. The District Principal advised the IEP was under development (mid-March 2017). A Learning Plan and the *Goals and Life Aspirations* sheet were included in the file but do not have the required components of an IEP.
 - There was no evidence of a current IEP dated after September 30, 2015 for one student reported in Code H. The District Principal advised that the IEP was currently under development (mid-March 2017).

- There was no evidence of a dated behaviour assessment indicating antisocial, extremely disruptive behaviour consistently and persistent over time or evidence of a severe mental illness diagnosed by a mental health professional for one student claimed. It was verified that the Instructional Support Planning Tool was not dated and was not completed in its entirety with behaviours rated in the mild to moderate range. There was no evidence of a current IEP dated after September 30, 2015.
- One student claimed was enrolled in September 2016 by her social worker but has not attended school. No IEP was developed.
- 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 30th, 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.

Without evidence of an IEP, the funding eligibility requirements for any special needs category classification are not met.

- Two student claims did not have evidence for placement in Mild Intellectual Disabilities (Code K).
 - One student did not have a current IEP dated after September 30, 2015. While the date on the top of the IEP was identified as 2016-2017, there was no evidence aligned with the 2016/17 school year in the body of the IEP to verify it had been updated from previous years. The Planning Team Meeting Date on the current IEP was June 3, 2015; the record of Parent/Guardian Contact on the IEP was dated October 17, 2013, October 3, 2013 and May 23, 2012; and, the most recent evaluation of goals and objectives on the IEP was dated April 16, 2015. There is no evidence in the IEP that the student received any service after June 30, 2015.
 - There was no evidence of assessment documentation in the file of one student to indicate the intellectual functioning of the student is two or more standard deviations below the mean and a similar degree of limitations in the adaptive skills in accordance with the Special Education Services Manual of Policies, Procedures and Guidelines. There was no evidence of a current IEP dated after September 30, 2015.
- Five student claims did not have evidence to meet criteria for placement in Learning Disabilities category (Code Q).
 - A student reported had no student file. When a clarification request was faxed to the secondary school a file was produced which included a number of test protocols and a sealed envelope that belonged to another student. No evidence was available to support placement in the reported category.

- For one student the most recent IEP was dated 2013/14. A current IEP dated after September 30, 2015 was requested but none was available. It was noted that the student completed his graduation requirements in January 2017 and no IEP was developed.
- One student without a current IEP dated after September 30, 2015 attended school in September and October of 2016. It was verified that the student had not attended since and there was no evidence additional services were provided.
- A student was reported as a result of a psycho-educational assessment dated 2011. The most recent psychological assessment report from Vancouver Island Children's Assessment Network dated September 13, 2013 meets the criteria for classification in the Mild Intellectual Disabilities category (Code K).
- For one student claim there was insufficient assessment information. There was no evidence of a complete cognitive assessment to support the category as outlined in the Special Education Services Manual of Policies, Procedure and Guidelines. The incomplete assessment report was photocopied and only included every second page. There was no evidence that the available assessment documentation indicated average or above average cognitive ability. There was also no assessment documentation showing persistent difficulties in the acquisition of reading, written language and/or numeracy.
- One student claim did not have evidence to meet criteria for placement in the Students Requiring Behaviour Support or Students with Mental Illness category (Code R). There was no assessment documentation to provide any evidence that the criteria was met or that the student requires behaviour support. There was no IEP dated after September 30, 2013 nor was there any evidence to indicate placement in any special education category.

Recommendations:

The auditors recommend that:

- The District must ensure student claims in Code H have a dated behaviour assessment that indicates evidence of antisocial, extremely disruptive behaviour in most environments and/or a severe mental illness diagnosed by a mental health professional. There must be evidence that planning is coordinated across agency and community as specified in the Special Education Services Manual of Policies, Procedures and Guidelines.
- For all Special Education designations reported on Form 1701, there must be an IEP in place dated after September 30th of the previous school and that all of the required components of an IEP are in evidence as specified in the Special Education Manual of Policies, Procedures and Guidelines.
- The District must ensure that students who are not in attendance as of September 30th are not reported on Form 1701.
- The District ensure that Form 1701 reporting is verified prior to submission and that student files are updated and reviewed regularly for accuracy and to ensure the students meet the criteria in the category in which they are claimed for the reported school year.
- For students reported in the Mild Intellectual Disabilities category (Code K), the District must ensure there is comprehensive assessment documentation that shows an intellectual functioning of two or more standard deviations below the mean on an individually administered Level C assessment of intellectual functioning and that limitations are of a similar degree in adaptive skill areas.

- The District must ensure that for Code Q designations, there is evidence of assessment documentation that shows persistent difficulties in the pre-academic skills and/or documentation of persistent difficulties in spite of remedial intervention in the acquisition of reading, writing and/or arithmetic skills and a significant discrepancy between estimated learning potential and academic achievement.
- The District ensure that the entire psych-educational assessment is available in the student file to support placement in Code Q.
- The District must ensure that students who are claimed in a special education category require and are receiving additional special education services, and that they have a current IEP in place dated after September 30th of the previous school year.
- The District ensure that the most current psycho-educational assessment information is used to designate students in a special education category.
- The District ensure when reporting a student in Code R assessment documentation from different sources includes aggression, and/or hyperactivity, and/or negative or undesirable internalized psychological states, and/or behaviours related to social problems, and/or behaviours related to other disabling conditions as identified in the Special Education Services Manual of Policies, Procedures and Guidelines.
- The Instructional Support Planning Tools, be completed in its entirety as an effective mechanism to assess the current level of performance, support student placement in a special education category and to guide interventions.
- The District's Tsawalk Learning Centre in Nanaimo be scheduled for a K-12 Enrolment and Special Education audit to ensure Alternate Education School services are provided in addition to the required criteria for supports and servicing to all students reported with a Special Needs designation.

Auditors' Comments

The auditors wish to express their appreciation to the District staff during the audit.