



**Ministry of Education
Resource Management Division**

2019/20 Special Education Enrolment Audit

AUDIT REPORT

James Cameron School (04296369)

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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 2019/20 school year, the Ministry of Education conducted Special Education enrolment audits, in selected schools recommended by the Office of the Inspector of Independent Schools (OIIS), 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 \(April 2016\)*](#).

Description of the Compliance Audit Process

A compliance audit was conducted at James Cameron School January 20 to 22, 2020.

Prior to the file reviews, an entry meeting was held with the Principal, the Special Education Coordinator and the Office Administrator. The audit team interviewed school administrators and staff to enquire about the Independent School Authority's policies, procedures and programs.

James Cameron School reported 38 students in special education categories at the Fall 2019 Form 1701 data submission. For the purposes of this audit, eight student records were reviewed in the following low incidence special needs categories:

Headcount	Category
7	Physical Disability or Chronic Health Impairment Category (Code D)
1	Autism Spectrum Disorder Category (Code G)

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

Headcount	Category
30	Learning Disability Category (Code Q)

The Special Education Coordinator was the contact person throughout the audit and was able to provide the audit team with evidence when clarification was required. Short meetings at the end

of each day with the Principal, Special Education Coordinator and Office Administrator enabled the audit team to keep the School staff apprised of the audit progress.

The file review process encountered two issues requiring a meeting with school staff. Both issues were related to the diagnostic criteria for Code D. There were four students reported in Code D and two of the students did not have evidence to support the diagnostic criteria for Code D.

The first issue was related to a student diagnosed with a Developmental Coordination Disorder (DCD). Four students were diagnosed with DCD, and three contained evidence of a high level of complexity and comorbidity with other concurrent diagnoses. Evidence to support the level of complexity for the other student was obtained upon request.

The second issue was related to a student with a Complex Developmental Behaviour (CDB) Condition. Evidence to support a multi-disciplinary assessment by a medical professional was not in the student's file but was provided upon request.

An exit meeting was held with the Principal, Special Education Coordinator and Office Administrator on January 22, 2020. The auditors reviewed the purpose of the audit and the audit criteria, explained the audit reporting process, shared the findings, clarified any outstanding issues, and expressed appreciation for the assistance provided.

Observations

There were no recommended reclassifications of the student claims reviewed by the auditors.

The auditors found that:

- For two students reported in Code D, not all the assessment criteria was initially in evidence:
 - One student claim with DCD was without evidence to indicate a level of complexity. Upon request, evidence was obtained to verify that assessment criteria for Code D was met.
 - One student claim with a CDB condition was without evidence of a medical diagnosis. While there was evidence of a psychological assessment, the medical diagnostic information was provided upon request.
- Current psycho-educational assessments were available for all students at the School. There was evidence that psycho-educational assessments were updated on a regular basis.
- The goals in the IEP were directly related to the recommendations in the diagnostic assessments and included detailed goals, strategies and resources from various professionals, including medical specialists, psychologists, counsellors, speech and language pathologists, occupational therapists and physical therapists.
- The services were outlined in the IEP. There was a high level of service provided including resource teacher case management, education assistants for all students, as well as weekly speech and language therapy, occupational therapy and counselling. During the audit it was verified that all students received daily one-on-one academic support from Orton Gillingham trained specialists. In accordance with the Grants to Independent Schools policy <https://www2.gov.bc.ca/gov/content/education-training/k-12/administration/legislation-policy/independent-schools/grants-to-independent-schools>:

“These grants are a specific type of special purpose grant. They are issued to assist the school in meeting the expenses associated with adapting or modifying the educational programs of students who qualify for special education grants.” These funds are specific to the students’ educational programming. It was confirmed that this alliance provided specialized therapeutic academic support for students with significant difficulty accessing learning literacy and numeracy. The assigned Orton Gillingham staff provided a high degree of specialized educational support that the School staff were not able to deliver.

- Therapy goals were provided in a tiered approach with some being implemented for all students in the class at a tier one level; in small groups at a tier two level; and, individualized for those needing intensive support.
- The Special Education Funding: Parent/Guardian Confirmation Form was signed and included in all student files.
- The School uses regular formative and standardized assessments to inform teaching and support goal tracking.

Recommendations:

The auditors recommend:

- The School ensure that all student files have appropriate detailed documentation to support that the students have been appropriately assessed and identified as meeting the criteria listed in the Special Education Manual of Policies Procedures and Guidelines for the reported category:
 - For student claims in Code D there must be evidence to support a diagnosis such as fetal alcohol spectrum disorders or complex developmental behaviour conditions made by a qualified medical specialist in consultation with a multi-disciplinary team of specialists.
 - DCD in and of itself does not meet the criteria for a physical disability or chronic health impairment as outlined in the Special Education Manual of Policies, Procedure and Guidelines.
- The School ensure that all IEP forms are fully dated rather than just noting the month and year.
- The School ensure that all directives specific to grant requirements including special education grants are met and not extended to fund other services not specific to educational programming.
- The School maintain the commendable level of service in place to meet the individual needs of the students that was identified during the audit.

Auditors’ Comments

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