



**Ministry of Education  
Resource Management Division**

**2019/20 Special Education and Indigenous Supports/Services  
Audit**

**AUDIT REPORT**

**SCHOOL DISTRICT No. 22 (Vernon)**

**2019/20 SPECIAL EDUCATION & INDIGENOUS SUPPORTS/SERVICES AUDIT  
REPORT  
SCHOOL DISTRICT No. 22 (Vernon)**

**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). The Ministry also funds boards of education based on the boards' enrolment of Indigenous students in September. The boards report Indigenous students to the Ministry on *Form 1701: Student Data Collection* (Form 1701).

In the 2019/20 school year, school boards reported 31,798 students enrolled in the low incidence supplemental special education funding categories at September 2019. School District No. 22 (Vernon) reported 536 students in the supplemental special education funding categories as of September 30, 2019. For the purpose of this compliance audit, School District No.22 (Vernon) reported 11 student claims in the Physically Dependent Category (Code A), 21 student claims in the Moderate to Profound Intellectual Disability Category (Code C), 101 student claims in the Physical Disability or Chronic Health Impairment Category (Code D), ten student claims in the Visual Impairment Category (Code E), 16 student claims in the Deaf or Hard of Hearing Category (Code F), 206 student claims in the Autism Spectrum Disorder Category (Code G), and 171 student claims in the Intensive Behavior Intervention/Serious Mental Illness Category (Code H).

The Ministry of Education annually conducts Special Education and Indigenous 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 and Indigenous 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 Special Education 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 and Indigenous Education enrolment audit was conducted in School District No. 22 (Vernon) during the week of March 9, 2020.

An entry meeting was held on March 9, 2020 with the Superintendent, Director of Aboriginal Learning, Director of Instruction-Student Support Services and the District Vice Principal-Student Support Services. Daily meetings were held with the Director of Instruction-Student Support Services, District Vice Principal-Student Support Services and a variety of student support personnel invited by the Director-Student Support Services. The purpose of these meetings was to present preliminary findings and to seek clarification related to the contents of files.

A sample of 11 student files reported in the Physically Dependent category (Code A), ten student files in Moderate to Profound Intellectual Disabilities (Code C), 75 student files in Physical Disability or Chronic Health Impairment (Code D), five student files in Visual Impairment (Code E), four student files in Deaf or Hard of Hearing (Code F), 30 student files in Autism Spectrum Disorder (Code G), and 125 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.

Within the special needs claims reviewed by the audit team was a sample of 100 Indigenous education claims which were reviewed and evaluated to determine if the students were provided with the required supports and services in accordance with Form 1701 Instructions and related policies.

The file review process prompted two auditors to visit one elementary and one secondary school. The purpose of the visits was to observe physically dependent students for whom the evidence in the file and the goals of the IEP did not support that the students were completely dependent on others for meeting all five daily living needs, nor that they required assistance at all times for mobility.

After the visit and considerable clarifications, it was determined that the student at the secondary school was a complex case and was completely dependent on others for meeting all major daily living needs.

There was evidence that an elementary school student was completely dependent on others for meeting all major daily living needs and required assistance at all times at the September 30, 2019 claim date. As it was verified the student was making progress with goals and should the skills continue to improve, the student would meet the criteria for Code D in the 2020/21 school year.

An exit meeting was held with the Superintendent, Secretary Treasurer, Director of Aboriginal Learning, Director of Student Support Services and District Vice Principal-Student Support Services on March 13, 2020. 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 current and subsequent 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, and Code F.

Of the 75 student files reviewed by the auditors in Code D:

- one student was recommended for reclassification to the Mild Intellectual Disabilities category (Code K)
- two students were recommended for declassification from any special needs category

Of the 30 student files reviewed by the auditors in Code G:

- one student was recommended for declassification from any special needs category

Of the 125 student files reviewed by the auditors in Code H

- one student was recommended for declassification from any special needs category

Based on the District's AIMS documentation, of the 100 Indigenous education student claims reviewed by the auditors, all had indicators of supplemental service aligned with the Ministry of Education's Form 1701 reporting directives and the [K-12 Funding Indigenous Education Policy](#).

The auditors found that:

- The assessments were current, the Instructional Support Planning Process was consistently used, and the identified needs were reflected in the development of the IEPs.
- The services provided to the students were appropriate and, in many cases, indicated a partnership with community agencies.
- While a student reported in Code A met the criteria as at the September 2019 claim date, there was evidence the individual has made observable gains in mobility and feeding throughout this school year. Based on the evidence at the time of the audit, the individual was no longer totally dependent on others for meeting all major daily living needs and would meet criteria for Code D for the subsequent school year.
- For student claims in Code D, three were recommended for reclassification:
  - One student claim was recommended for reclassification to Code K. The student was claimed in Code D based on a medical diagnosis of a brain injury in 2007. The file had well documented evidence of developmental delays and a speech language disorder which preceded the brain injury. A 2009 report from the Interior Health Children's Assessment Network reports: "*no loss of skills due to brain injury*", and further correspondence dated 2011 stated that the student was seizure free. All IEP goals, functioning and needs support placement in Code K.
  - One student claim was recommended for declassification from any special needs category as there was no evidence linking the diagnosis to the serious and significant impact on the student's education, achievement and functioning. The student was claimed in Code D based on a 2009 letter from a doctor diagnosing Narcolepsy. There has been no medical evidence since 2009. The assessment evidence regarding functioning shows the diagnosis as having little or no impact on the student's education and functioning. The report card reports the student as "*doing well*". The IEP evaluation dated June 2019 indicated the student was exceeding all goals.

- One student reported as meeting the criteria for Code D was based on a 2018 report from a physiotherapist that suggested the student had Developmental Coordination Disorder (DCD). As there was no evidence aligned with any special needs classification and there was no evidence from a medical professional to support the diagnosis of DCD, the recommendation is for declassification from any special needs category.
- One student claim for Code G was recommended to be declassified from any special needs category. It was verified the student was completing a Youth Trades Training program at a post secondary institution. There was no evidence that the student received any special education services or supports to address the needs identified in the assessment documentation that were beyond those offered to the general student population.
- In Code H one student was recommended to be declassified. At the time of the September 30, 2019 claim date there was no evidence to meet the Code H criteria including planning coordinated across agency and community.
- The consistent use of the District's AIMS system to track service delivery for those students reported as receiving Indigenous services and supports was complete and provided by the District as evidence of supplemental assistance and aid for each student in the sample. The District provides a literacy support teacher for Indigenous students in the primary grades. The Vision document that was shared with the auditors was provided as evidence that the District is planning for the continued success of Indigenous students.

### **Recommendations**

The auditors recommend that:

- The District staff ensure Form 1701 reporting is verified prior to submission and student claims have documented evidence that is current 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's support service staff ensure that any students claimed in Code A, the Physically Dependent category, are completely dependent on others for meeting all major daily living needs. The students must require assistance at all times for each of the following: feeding, dressing, toileting, mobility and personal hygiene in accordance with the Special Education Manual of Policies, Procedures and Guidelines. Any gains identified throughout a current school year would necessitate reviews and reclassifications to another special needs category, as appropriate.
- The District's support services staff ensure any Code D student claims have a medical diagnosis of a nervous system impairment that impacts movement, a musculoskeletal condition or a chronic health impairment that seriously impacts the students' education and achievement; and, the students' functioning and education is significantly impacted by their physical disability or chronic health impairment as outlined in the Special Education Manual of Policies, Procedures and Guidelines.
- The District's support services staff ensure that any claims in Code G have documented evidence the student is receiving special education services to address the needs identified in the assessment documentation; are beyond those offered to the general school population; and, are proportionate to level of need.

- The District's support services staff ensure student claims in Code H have evidence that meets the criteria listed in the Special Education Manual of Policies, Procedures and Guidelines.
  - For students with a serious mental illness, there must be evidence of a mental health assessment made by a mental health professional.
  - For students needing intensive behaviour support, there must be evidence of a behavioural assessment indicating antisocial, extremely disruptive behaviour in most other environments and consistently over time.
  - There must be evidence that the planning is coordinated, across-agency and community using integrated case management.
- The District's support services staff ensure that all IEP goals correspond to the category in which the student is identified.
- The District continue ensuring eligible students are provided with the Indigenous supplemental supports and services demonstrated in the AIMS data.

### **Auditors' Comments**

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