



**Ministry of Education
Resource Management Division**

2019/20 Special Education Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 63 (Saanich)

2019/20 SPECIAL EDUCATION ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 63 (Saanich)

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 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. 63 (Saanich) reported 549 students in the supplemental special education funding categories as of September 30, 2019. For the purpose of this compliance audit, School District No. 63 (Saanich) reported eight student claims in the Physically Dependent Category (Code A), 19 student claims in the Moderate to Profound Intellectual Disability Category (Code C), 120 student claims in the Physical Disability or Chronic Health Impairment Category (Code D), one student claim in the Visual Impairment Category (Code E), 11 student claims in the Deaf or Hard of Hearing Category (Code F), 147 student claims in the Autism Spectrum Disorder Category (Code G), and 243 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. 63 (Saanich) during the week of January 27, 2020.

An entry meeting was held on January 27, 2020 with the Director of Instruction-Diversity and Inclusion, the Director of Instruction-Learning and Innovation, the District Instructional Support Teacher, the Secretary Treasurer, the Assistant Superintendent and the Superintendent. 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 eight 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), one student file in Visual Impairment (Code E), five student files in Deaf or Hard of Hearing (Code F), 22 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.

The file review process did not encounter issues requiring school visits. The Director of Instruction-Diversity and Inclusion was able to provide the audit team with evidence when clarification was required. Meeting daily with the Director of Instruction-Diversity and Inclusion enabled the audit team to keep the District staff apprised of the audit progress.

An exit meeting was held on Friday, January 31, 2020 with the Secretary Treasurer, the District Instructional Support Teacher, the Director of Instruction-Diversity and Inclusion, the Director of Instruction-Learning and Innovation, and the Assistant Superintendent. The Superintendent participated in the meeting by telephone. The auditors reviewed the purpose of the audit and the audit criteria, explained the audit reporting process, reported their findings, clarified any outstanding issues, and expressed appreciation for the assistance provided.

Observations

No student claims were recommended for reclassification in Code A, Code C, Code E, Code F, Code G and Code H.

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

- Two student claims were recommended for reclassification to Code H.
- Two student claims were recommended for reclassification to the Learning Disabilities category (Code Q).

The auditors found that:

- The evidence was well organized providing an ease of access when verifying the student files, with required clarifications responded to in a timely manner.
- While the District had developed several forms which contained helpful information, there was no consistent use of the following throughout the District schools.
 - Record of Communication
 - Learning Services Referral Form
 - Instructional Support Planning
 - IEP Year End Review
 - EA and IST schedules
- SIDES, the District's Distributed Learning facility's intake form was often used consistently.
- One student claim with a diagnosis of Anorexia Nervosa, two years ago experienced physical manifestations of the disorder and was medically compromised. At the time of the

September 2019 claim, there was no further evidence in this regard and no evidence supporting a claim in Code D. There was evidence the student was struggling with this mental health disorder aligned with the criteria and supporting a claim in Code H.

- One student claim with a diagnosis of Anorexia Nervosa, Reactive Attachment Disorder, ADHD, Oppositional Defiant Disorder and Persistent Depression. These are mental health diagnoses and do not meet criteria for Code D. There was no evidence in the student file to indicate the student was experiencing physical manifestations nor medically compromised. There was evidence supporting the criteria aligned with Code H.
- There were two students claimed in Code D who had diagnoses of Childhood Apraxia of Speech (CAS). Both diagnoses were made by a Speech and Language Pathologist. There was no evidence of a medical diagnosis to support a claim in Code D. There was evidence to support the criteria for Code Q.
- While there were a number of student files in Code H that had evidence indicating mental health issues, there was no evidence of a mental health diagnosis being made by a mental health professional in accordance with the Special Education Manual of Policies, Procedures and Guidelines. In response to the audit team's clarification requests, the District staff provided additional evidence including a diagnosis made by a mental health professional that was not originally in evidence. There were students for whom the District was unable to provide evidence of a mental health diagnosis but did provide evidence of severe and at risk behaviours, including letters of impact provided by the School, to support the Code H claim.
- There were a number of students claimed in Code H that had evidence of recent Code Q designations from previous years. Although the current evidence in the student file did meet the Code H criteria, the auditors queried the described behaviors. District staff had determined due to the significant behaviors and the impact on the student learning, along with the support from an outside agency, the criteria for Code H was met.
- The District is in the process of transitioning their IEP format. There were a number of competency based IEPs that required clarification to verify there were individual goals and objectives aligned with the category in which the student was claimed. Additional, enhanced goals were provided to the auditors upon request.

Recommendations

The auditors recommend that:

- The District ensure student claims in Code D have evidence that meets the criteria in accordance with the Special Education Manual of Policies, Procedures and Guidelines.
 - 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.
 - There must be evidence the student's function and education is significantly affected by their physical disability or chronic health impairment.
- The District 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 ensure that students diagnosed with CAS (Childhood Apraxia of Speech) with no evidence of any medical diagnosis be claimed in the category which best reflects their learning needs and in accordance with the Special Education Manual of Policies, Procedures and Guidelines.
- The District continue to review student classifications to ensure there is current evidence to support changes in category designations.
- The District ensure that the competency based IEPs align with the current requirements for IEPs including those identified in the Special Education Manual of Policies, Procedures and Guidelines: there “*is a documented plan developed for a student with special needs that describes individualized goals, adaptations, modifications, the services to be provided and includes measures for tracking achievement*”, and the [Individual Educational Plan Order M638/95](#).

Auditors’ Comments

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