



**Ministry of Education
Resource Management Division**

2020/21 Special Education Enrolment Audit

AUDIT REPORT

Kenneth Gordon Maplewood School (044 96204)

2020/21 SPECIAL EDUCATION ENROLMENT AUDIT REPORT
Kenneth Gordon Maplewood School (044 96204)

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 2020/21 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.

Workplace and travel restrictions resulting from the Covid-19 pandemic provided an opportunity for the Ministry of Education, public school boards and independent school authorities to transition to digital remote evidence verification during the 2020/21 school year. Due to the remote procedures undertaken, much of the evidence was based on anecdotal explanations when evidence submitted required further clarification.

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 Kenneth Gordon Maplewood School February 22 to 26, 2021.

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

Kenneth Gordon Maplewood School reported 172 students in special education categories at the Fall 2020 Form 1701 data submission. For the purposes of this audit, 53 student records were reviewed in the following low incidence special needs categories:

Headcount	Category
20	Physical Disability or Chronic Health Impairment Category (Code D)
1	Deaf or Hard of Hearing Category (Code F)
25	Autism Spectrum Disorder Category (Code G)
7	Intensive Behaviour Intervention or Serious Mental Illness Category (Code H)

The file review process encountered four issues requiring a meeting.

One issue was related to lack of evidence to meet the criteria for the Physical Disability/Chronic Health Impairment category. Ten of the files presented for review did not contain the required medical diagnostic report from a medical professional. The required diagnostic documentation was obtained upon request for all but one claim. Six of the claims were without evidence of the physical disability or chronic health impairment having a significant impact on the student's functioning and education. Evidence of serious impacts was provided for four student claims when further clarification was requested.

The second issue was related to lack of evidence to meet diagnostic criteria for the Autism Spectrum Disorder category. 13 files were without the original report providing the diagnosis of autism. The original diagnostic reports were provided when further clarification was requested.

The third issue related to lack of evidence to meet the criteria for the Students Requiring Intensive Behaviour Intervention/Students with Serious Mental Illness category. Four of the files were without evidence of a mental health disorder diagnosis by a mental health professional or a behaviour assessment of a behavioural condition requiring intensive behaviour supports. Assessment evidence was provided when further clarification was requested. Seven of these files were without evidence of coordinated outside agency integrated case management. Evidence of coordinated planning across agency was provided for all but two students when further clarification was requested.

The fourth issue related to services to students who were remote learners working from home due to health and immune compromise concerns during the pandemic. The services provided to the six remote learners were not evident on the IEPs. A summary of the services for the six remote learners was provided when further clarification was requested.

The Deputy Head of School-Director of Student Support Services was the primary contact providing the audit team with evidence and clarifications. Daily meetings with the Head of School and Deputy Head of School-Director of Student Support Services enabled the audit team to keep the school staff apprised of the audit findings.

Within this designated special needs school, students were supported regularly by experts inside and outside the classroom in a three-tiered model of support involving an extensive team of specialists and other staff including: additional teachers, counsellors, speech and language pathologists, occupational therapists, a psychologist, Orton Gillingham supports, a behaviour consultant, behaviour interventionists and education assistants.

An exit meeting was held with the Head of School and Deputy Head of School-Director of Student Support Services on February 26, 2021. 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 2020/21 school year, and expressed appreciation for the assistance provided.

Observations

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

- One claim was recommended for reclassification to Code G
- One claim was recommended for reclassification to Code Q

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

Of the 7 files reviewed by the auditors in Code H:

- Two students were recommended for reclassification to Code Q

The auditor(s) found that:

- In Code D one student claim was without an assessment to support placement in that category as outlined in the Special Education Manual of Policies, Procedure and Guidelines. An Autism diagnostic report, services and IEP goals met the criteria for reclassification placement in Code G.
- One Code D student claim was without any evidence of a medical diagnosis to support the claim in that category as outlined in the Special Education Manual of Policies, Procedure and Guidelines. The goals in the IEP for this student did not correspond to Code D. There was a psycho-educational assessment report and IEP goals that supported placement in the Learning Disability Category (Code Q).
- Two Code H claims were without evidence to meet the criteria for placement in the Intensive Behaviour Interventions/Serious Mental Illness Category. There was no evidence to support that planning was coordinated across agency and community with integrated case management as outlined in the Special Education Manual of Policies, Procedure and Guidelines. For both student claims there was a psycho-educational assessment and IEP goals that supported placement in the Learning Disability Category (Code Q).
- The original report providing the diagnosis of Autism for two Code G claims was not available. In one instance the non-BCAAN (Private) form and in another case the BCAAN clinical outcome form Diagnosis of Autism Spectrum Disorder, or the Ministry of Children and Family Development (MCFD) approval for Autism Services were used as evidence of a diagnosis of Autism Spectrum Disorder. While sufficient for category placement, these forms and the letter do not contain recommendations for educating the student.
- IEPs did not always meet the criteria listed in the Special Education Services Manual of Policies Procedure and Guidelines.
 - IEPs did not have a specific creation date listing only the month and year.
 - IEPs did not contain a method of measuring student progress in relation to the IEP goals.
 - IEP goals did not always contain measurable objectives and did not always correspond to the category in which the students were identified.
- All Parent/Guardian Confirmation forms were signed, providing evidence that the parent/guardian was consulted in the preparation of the IEP.

Recommendations:

The auditors recommend that:

- The School staff ensure all student files have assessments that support the student classification for the reported category in accordance with the Special Education Manual of Policy, Procedures and Guidelines.
- The School staff ensure student claims in Code D meet the criteria listed in the Special Education Manual of Policies Procedure 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.
- The School staff ensure student claims have evidence of diagnostic assessment reports with appropriate detailed assessments that meet the criteria for Code G as outlined in the Special Education Manual of Policy, Procedures and Guidelines.
- The School staff ensure student claims in Code H have evidence of coordinated outside agency integrated case management in the student files as per the criteria in the Special Education Manual of Policy, Procedures and Guidelines.
- The School staff ensure that the 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 *"evidence of evaluation or review, which could include revisions made to the plan and the tracking of achievement in relation to goals"*, as well as the [Individual Educational Plan Order M638/95](#).
- The School staff ensure that:
 - the IEP has a specific date that the IEP was created.
 - the IEP has goals and objective that are measurable and in alignment with the category in which the student is identified.
 - the IEP outlines the methods for measuring progress in relation to the IEP goals.
 - the IEP lists all the services provided for the student.
- The School review their current procedures with respect to Orton Gillingham supports to ensure alignment with the directives specific to Independent School Grant allocations and the Special Education Guidelines. These funds are specific to student educational programming, not tutoring. The [Grants to Independent Schools policy](#) says: *"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."*
- Given the outcomes identified at the time of the audit, the School be required to contact the Ministry of Education's Compliance Manager EDUC.Compliance@gov.bc.ca to arrange for the School staff to undertake a special needs workshop with a focus on writing effective IEPs and on special education category designation requirements to ensure all related staff are adhering to and working in accordance with the Special Education requirements.

Auditors' Comments

The auditor(s) express their appreciation to the school staff for their cooperation during the audit.