



**Ministry of Education
Resource Management Division**

2020/21 Special Education Enrolment Audit

AUDIT REPORT
REVISED June 7, 2021

Oak and Orca Distributed Learning School (061 96745)

2020/21 SPECIAL EDUCATION ENROLMENT AUDIT REPORT Oak and Orca Distributed Learning School (061 96745)

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 (OIS), 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 Special Education audit was conducted with Oak and Orca Distributed Learning School during the week of February 1, 2021.

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

Oak and Orca Distributed Learning School reported 111 students in special education categories at the Fall Form 1701 data submission for the 2020/21 school year. For the purposes of this audit, 54 student records were reviewed in the following low incidence special needs categories:

Headcount	Category
6	Physically Dependent Category (Code A)
1	Moderate to Profound Intellectual Disability Category (Code C)
15	Physical Disability or Chronic Health Impairment Category (Code D)

Headcount	Category
25	Autism Spectrum Disorder Category (Code G)
7	Intensive Behaviour Intervention or Serious Mental Illness Category (Code H)

No student records were reviewed in the high incidence special needs categories.

The school staff advised that due to the pandemic, the Oak and Orca Distributed Learning School experienced an unexpected enrolment increase in August and September of 2020, with many new students claimed for supplemental funding.

The auditors remotely reviewed the files presented as evidence. If, at the claim date, there was no evidence of engagement in support services to meet the student’s needs and in accordance with Special Education Guidelines, the team communicated with the staff in writing and via Zoom meetings to determine what services were in place and what efforts had been made to engage the student in accessing the face-to-face or online educational supports.

In all but one instance, school staff were able to provide evidence to verify due diligence to engage support services by the claim date.

An exit meeting was held with the Principal, an Inclusive Education Teacher and the School’s Project Manager on February 5, 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 and expressed appreciation for the assistance provided.

Observations

There were no recommended reclassifications for Code A, Code C and Code H.

Of the 15 student files reviewed by the auditors in Code D:

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

Of the 25 student files reviewed by the auditors in Code G:

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

The auditor(s) found that:

- Oak and Orca Distributed Learning School continues to utilize Brain Boost Education. At the time of the audit evidence presented indicated that at least two students were receiving supports one hour per week through Brain Boost. There was evidence presented by the School that an Oak and Orca Distributed Learning teacher was overseeing and reporting out on the Brain Boost support services . The School advised they utilize Brain Boost for social outings to work on behaviour much like a special education assistant position.

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> 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.”

- The IEP meeting minutes were dated and indicated student centred discussion and planning.
- Most secondary students had evidence of transition goals on their IEP.
- The IEP form explained the current functioning level of the student and contained SMART goals and objectives.
- There was no evidence of clear and differing measurement strategies nor evidence of a consistent system to track goal achievement.
- The impact of the disability on the student’s learning was not always evident.
- Evidence of communication logs from teachers, service providers, and special education assistants was not always readily available to support the documentation of service being provided.
- One Code D claim was for a student taking a single course at Oak and Orca Distributed Learning School. The student was claimed for supplemental funding even though the majority of the courses were provided in another school. There was no evidence of services nor of an IEP. The Principal stated that this claim was made in error.
- For one student reported in the Code G category there was insufficient evidence to meet the Special Education Services Manual of Policies, Procedures and Guidelines criteria. The School was aware, in advance of the student’s enrolment, that the family was not comfortable with face-to-face services and was reluctant to engage with online services. Without evidence of service supports aligned with the category reported, the claim is recommended for declassification from any special needs category.

Recommendations

The auditors recommend that:

- The School ensure there is a system in place for indicating the measurement used for documenting progress on and achievement of IEP goals. Additionally, there is to be clear evidence of reporting on the progress and achievement of IEP goals. This is per the Special Education Services Manual of Policies, Procedures and Guidelines: *An IEP should include evidence of evaluation or review, which could include revisions made to the plan and the tracking of achievement in relation to goals.*
- The School ensure that the impact of the disability on student learning is evident. The disability is to significantly impact the student’s functioning and education.
- The School ensure there is a system in place to record dated communication logs and services provided to the students.
- The School review their current procedures with respect to Brain Boost 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 School adhere to the requirements within Schedule “A” of their current DL Agreement specific to the use of third parties: *...“materials, services and resources provided through a third party may only be for purposes related to meeting learning outcomes as set out in the Educational Standards Order and are documented within the SLPs”.*

- The School ensure students are claimed in the educational category that best reflects the type and intensity of educational interventions and supports that are needed as per the Special Education Services Manual of Policies, Procedures and Guidelines.
- The School is to ensure only when Oak and Orca is the school of record and the primary support services provider that students are reported on Form 1701 for special needs supplemental funding.
- The School ensure all students claimed on Form 1701 meet the classification categories per the Special Education Guidelines and have supplemental support services in place and evidence of engagement with those services at the time of the claim date.

Auditor's Comments

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