



**Ministry of Education  
Resource Management Division**

**2020/21 Special Education Enrolment Audit**

**AUDIT REPORT**

**SCHOOL DISTRICT No. 71 (Comox Valley)**

## **2020/21 SPECIAL EDUCATION ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 71 (Comox Valley)**

### **Background**

The Ministry of Education funds boards of education based on their 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 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.

In the 2020/21 school year, school boards reported 34,264 students enrolled in the low incidence supplemental special education funding categories at September 2020. School District No. 71 (Comox Valley) reported 425 students in the supplemental special education funding categories as of September 30, 2020. For the purpose of this compliance audit, School District No.71 (Comox Valley) reported six student claims in the Physically Dependent Category (Code A), one student claim reported in the Deafblind Category (Code B), 11 student claims in the Moderate to Profound Intellectual Disability Category (Code C), 125 student claims in the Physical Disability or Chronic Health Impairment Category (Code D), five student claims in the Visual Impairment Category (Code E), 20 student claims in the Deaf or Hard of Hearing Category (Code F), 185 student claims in the Autism Spectrum Disorder Category (Code G), and 72 student claims in the Intensive Behavior Intervention/Serious Mental Illness Category (Code H).

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 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 remote Special Education enrolment audit was conducted in School District No. 71 (Comox Valley) during the week of April 12, 2021.

An entry meeting was held on April 12, 2021 with the Superintendent, the Director of Instruction-Student Support Services and the District Principal-Student Support Services. Daily meetings were held with the Director of Instruction-Student Support Services and the District Principal-Student Support Services to present preliminary findings and to seek clarification related to the contents of files.

A sample of six student files reported in the Physically Dependent category (Code A), one student file in the Deafblind (Code B), five student files in Moderate to Profound Intellectual Disabilities (Code C), 25 student files in Physical Disability or Chronic Health Impairment (Code D), two student files in Visual Impairment (Code E), five student files in Deaf or Hard of Hearing (Code F), 12 student files in Autism Spectrum Disorder (Code G), and 25 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 staff advised that due to the Covid-19 pandemic, there was a significant increase in the District's distributed learning school (NIDES) enrolment during September. The pandemic also resulted in parents deciding just before the claim date whether their student would attend a face-to-face program, enroll in the NIDES program, or home school their children.

The auditors reviewed the files, presented as evidence, remotely. In instances where there was no evidence of attendance or support service engagement to meet the student's needs in accordance with Special Education Guidelines, the team communicated with the Director of Instruction-Student Support Services and the District Principal-Student Support Services in writing and via Zoom meetings in an effort to determine what services were in place and what efforts were made to engage the student in accessing educational supports. In all but one instance, evidence was provided to verify attendance and demonstrate engagement of support services.

An exit meeting was held with the Superintendent, the Director of Instruction-Student Support Services, an incoming Director of Instruction-Support Services and the District Principal-Student Support Services on April 15, 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**

There were no recommended reclassifications for Code A, Code B, Code D, Code E, Code F or Code G.

Of the five student files reviewed by the auditors in Code C:

- One adult student was recommended for declassification from any special needs category.

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

- One student was recommended for declassification from any special needs category.

The auditors found that:

- There were procedures in place to ensure claims in Code H meet the Special Education Services Manual of Policies, Procedures and Guidelines criteria for that category.
- While the District utilizes the competency-based IEP, there were instances where the goals were not specific to student need or aligned with the category claimed.
- It was difficult to readily ascertain the attendance for the students enrolled in the Glacier View Alternate Education Program and NIDES. The District staff explained that attendance evidence provided for the audit was from MyEdBC. Neither the Alternate Education Program facility nor NIDES utilized MyEdBC to enter attendance data.
- For one Code H claim, there was no evidence the student was attending as at the claim date nor any evidence of student engagement in the program plan nor provision of services.
- One adult student claim was without evidence to meet the [Adult Funding Policy](#) directives for attendance, eligible course claims nor special needs supplemental services.
  - The student was enrolled and attending a post-secondary institution, undertaking a life skills and community engagement program in partnership with North Island College and the District.
  - The overall eligibility for boards to be able to report non-graduated adult students (including those with special needs) is from the [Adult Funding Policy](#) which says: “*Non-graduated [adult students](#) are eligible for course funding leading to the British Columbia Certificate of Graduation (the Dogwood) or leading to the Adult Graduation Diploma (the Adult Dogwood). Funding for Non-Graduated Adults: Boards of Education enrolling adult students, who have not graduated, may receive funding in certain circumstances. The adult students must be enrolled in eligible courses that lead to the B.C. Certificate of Graduation or the B.C. Adult Graduation Diploma...limited to Ministry of Education and Board/Authority Authorized courses, because these are the specific courses that lead to a graduation diploma*”. It was verified that the eight courses claimed for funding were not Ministry Authorized courses or Board/Authority Authorized courses, nor was there evidence to meet the Adult Funding Policy’s attendance requirement. *Attendance (**Adult Education**) Attendance is defined to be over one reporting period AND either 1) a minimum of 10 hours of instruction in a classroom or learning centre for each course or a demonstrated completion of 10% of the course requirements OR 2) meets the Grade 10-12 active requirements as outlined in the [DL Active Policy](#).*
  - *Special Needs Funding for Non-Graduated Adults: Adult students who have not graduated are eligible for special needs funding if they have special needs under certain circumstances. See [K-12 Form Instructions Form 1701](#), for category details. Adult students must also have been reported on the Form 1701 in the prior school year (they are continuing their K-12 education program uninterrupted from when they were still school age) and are working towards the continuation of those goals set out in their Individual Education Plan (IEP).”* It was verified that the IEP had two general goals

carried forward from when the student was school age, but several new goals had been added. The addition of new goals for the adult student does not meet the directives.

- In addition to the directives for special needs supplemental funding eligibility for adults found in the Adult Funding Policy are the [Form 1701 Instructions](#) – “*students who are non-graduates over the age of 19...have special needs...were reported in previous school year...are in accordance with the Adult Funding Policy, continuing their K-12 education program uninterrupted from when they were still school age, and are working towards the continuation of those goals set out in their individual Education Plan (IEP) – may be reported on Form 1701.*”

## **Recommendations**

The auditors recommend that:

- The District staff ensure that all IEP goals correspond to the category in which the student is identified. The IEP must outline methods for measuring the student’s progress in relation to the IEP goals (goals must be measurable).
- The District staff ensure there is a system in place to accurately record and report attendance at Glacier View Alternate Education Program and NIDES.
- The District staff ensure that students claimed for funding are attending at the Form 1701 claim date.
- The District staff ensure all special needs supplemental claims reported for funding meet the Form 1701 Instructions criteria for special needs including ensuring a plan for the delivery of the special education services are in evidence at the time of the September claim deadline.
- The District staff ensure any adult claims, including claims for special needs supplemental funding, have evidence to meet all the adult funding eligibility directives including the Adult Funding Policy and the Form 1701 Instructions directives specific to non-graduated adults.
- Based on the challenges for attendance verification, the District be considered for an audit of their Alternate Education Program facility and Distributed Learning school.

## **Auditors’ Comments**

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