



**Ministry of Education
Resource Management Division**

2020/21 Special Education Enrolment Audit

AUDIT REPORT

SIKH ACADEMY (036 96797)

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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 compliance audit was conducted at Sikh Academy from February 8 to 10, 2021.

Prior to the file reviews, a remote entry meeting was held with the Principal to enquire about the Independent School Authority's policies, procedures, and programs.

Sikh Academy reported six students in special education categories at the Fall 2020 Form 1701 data submission for the 2020/21 school year. For the purposes of this audit, all six student records were reviewed in the following low incidence special needs category:

Headcount	Category
6	Physical Disability or Chronic Health Impairment Category (Code D)

The Principal was the designated contact person throughout the audit and was able to provide the auditor with evidence when clarification was required.

The file review process encountered two issues requiring meetings with the Principal. Both issues were related to criteria for Code D.

One issue was specific to the diagnostic criteria for Code D. Two student files, as initially presented, did not have required diagnostic criteria. The documentation was obtained when further clarification was requested.

The second issue was specific to required evidence that the education and achievement significantly impacted physical disability/chronic health impairment for five student claims in Code D. Evidence to support a serious level of impact of the students' condition on education and achievement was provided for four of the students when further clarification was requested.

A remote exit meeting was held with the Principal on February 10, 2021. The auditor reviewed the purpose of the audit and the audit criteria, explained the audit reporting process, reported the findings, clarified any outstanding issues, discussed current and subsequent reclassifications, and expressed appreciation for the assistance provided.

Observations

Of the six student files reviewed by the auditor in Code D:

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

The auditor found that:

- One student claim for Code D was without evidence of an impairment that seriously impacted the student's education and achievement. There was no evidence of service provision to support a student claim in Code D. Evidence verified supervision was provided at recess and while eating lunch.
- In this instance, no adjustments were recommended for two students with Type 1 Diabetes for this school year only, as there was evidence of students gaining independence to manage their medical condition. Only those students where their functioning and education is significantly impacted by their chronic health impairment as identified in the Special Education Service Manual of Policies, Procedures and Guidelines are to be reported in the Code D category.
- For the Code D claims, evidence was not readily available to verify the students' functioning and education was significantly affected by a chronic health impairment. A note provided by the School in response to the auditor's clarification requests stated: *"At the end of the school year, the collaborative support team will complete the Physical Disabilities/Chronic Health Impairments Instructional Support Planning Process Form to evaluate further the progress and needs of the student for the upcoming school year."*
- IEPs were written with target outcomes that were long-term goals. There were no measurable objectives. On the IEP, there was evidence of goals written for the staff. This is not an IEP requirement. Indications of the staff responsible for implementing the strategies provided to students is required.
- In the majority of instances, the IEP goals did not address the range of domains considered for Code D.

- Timetables provided as evidence showed support services provided by the School throughout the week. Nursing Support Services Plans were student-specific and current. The plans were reviewed regularly with the Nursing Support Services and School Staff.
- The Special Education Funding: Parent/Guardian Confirmation Form was signed and included in all student files.

Recommendations:

The auditors recommend that:

- The School staff ensure all Physical Disability/Chronic Health Impairment claims meet the criteria listed in the Special Education Manual of Policies, Procedure and Guidelines for that category. There must be documentation of a medical diagnosis indicating a physical disability/chronic health impairment which significantly impacts the student’s education and achievement. The assessment documentation must show that the student’s functioning and education is significantly affected by their physical disability/chronic health impairment.
- 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 the [Individual Educational Plan Order M638/95](#).
- The School staff ensure that all student IEPs have:
 - measurable goals and objectives that are consistent with the needs of the student and reflective of the designation code claimed;
 - several sources of data to measure goal attainment; and
 - correct dates.
- The School staff ensure that IEP goals and objectives are clear, measurable, and aligned with the category in which the student is identified.
- The School staff ensure all students reported in Code D meet the service provision criteria of special education services beyond those offered to the general student population and are proportionate to the level of need.
- The School staff, in conjunction with Nursing Support Services, must assess the student's level of independence with Diabetes to determine future levels of support. Evidence must be in place confirming that this is a chronic health impairment which significantly impacts the student’s functioning and education, along with appropriate service provision for Code D.
- As the School staff must assesses the student’s level of independence and impact on education to determine if they continue to require the same level of support each year, there are two forms to help support this process:
 1. the [Physical Disabilities/Chronic Health Impairments Instructional Support Planning Process](#)
 2. the [School Physician Communication Form](#)
- The School staff be required to develop a process for annually determining the impact of students’ condition on their education, achievement and functioning prior to reporting any special needs supplemental claim, including Code D.
- Given the issues identified at the time of the audit, the School staff be required to contact the Ministry of Education’s Compliance Manager EDUC.Compliance@gov.bc.ca to arrange for

the Sikh Academy staff to undertake a special needs workshop including a focus on writing effective IEPs.

Auditor's Comments

The auditor expresses appreciation to the school principal for his assistance during the audit.