



**Ministry of Education and Child Care
Resource Management Division**

2021/22 Special Education Enrolment Audit

AUDIT REPORT

**HERITAGE CHRISTIAN ONLINE SCHOOL
(023 96738)**

2021/22 SPECIAL EDUCATION ENROLMENT AUDIT REPORT HERITAGE CHRISTIAN ONLINE SCHOOL (023 96738)

Background

The Ministry of Education and Child Care 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 2021/22 school year, the Ministry of Education and Child Care 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.

Purpose

The purpose of the Special Education enrolment audit is to provide assurance to the Ministry of Education and Child Care 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 Heritage Christian Online School (HCOS) on February 28 to March 4, 2022.

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

HCOS reported 746 students in special education categories at the Fall 2021 Form 1701 data submission. For the purposes of this audit, 101 student records were reviewed in the following low incidence special needs categories:

Headcount	Category
8	Physically Dependent (Code A)
4	Deaf/Blind (Code B)
3	Moderate to Profound Intellectual Disability (Code C)
30	Physical Disability or Chronic Health Impairment (Code D)
1	Visual Impairment (Code E)
5	Deaf or Hard of Hearing (Code F)
30	Autism Spectrum Disorder (Code G)
20	Intensive Behaviour Intervention or Serious Mental Illness (Code H)

An exit meeting was held with the Special Education staff including: Office Manager, Administrator, Director, Island North Regional Administrator, Mainland Regional Administrator, Interior Regional Administrator, Business Director and Administrative Assistant as well as the Director of Technology, Business Head of School, Academic Head of School on Friday, March 4, 2022. 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 2021/22 school year, and expressed appreciation for the assistance provided.

Observations

There were no recommended reclassifications for the student files reviewed by the auditors in Code A, Code B, Code C, Code E, Code F, and Code H.

Of the 30 student files reviewed by the auditors in Code D:

- two students were recommended for declassification from any special needs category.

Of the 30 student files reviewed by the auditors in Code G:

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

The auditors found that:

- Overall
 - There were transition goals for students.
 - Psycho-educational testing was conducted at transition points.
 - A variety of supports including instances of wrap around supports were available.
 - Code H Instructional Support Planning Tools clearly indicated the areas of focus.
 - The HCOS staff worked as a team to support students and communicated to families in a variety of ways.
 - Parents were involved in the creation of the IEP.
 - There was clear and detailed reporting on student progress, especially at the secondary level.
 - The HCOS staff knew their students and found appropriate supports for the students.
- For an adult Code D claim there was no evidence that the student was working on the same goals as per their school age Individual Education Plan (IEP). There was evidence that planning had been changed from when the student was school age and new goals had been added for the 2021/22 IEP contrary to the non-graduated adult directives for Independent Schools.
- For one Code D claim, the evidence did not support a chronic health condition or a diagnosis of a complex development behaviour condition made by a qualified medical specialist (paediatrician, psychiatrist, neurologist, or a medical professional specializing in developmental disorders) in consultation with a multi-disciplinary team of specialists (registered psychologist, speech/language, occupational therapist, physical therapist).

Based on the evidence at the time of the September claim, the student classification met the criteria for the Learning Disabilities (Code Q) or the Mild Intellectual Disabilities (Code K) category.

- For one Code G claim, there was no evidence of B.C. residency. The HCOS staff knew on September 5, 2021 that the family planned to move to Ontario by October 2021. There was no evidence of educational supports/services for the student with “*TBD-once services start in March 2022*” indicated in the IEP objectives. When the auditors sought evidence that the student was ordinarily resident in B.C. and therefore eligible for any claim, the school stated, “*We did know they were planning to move, but as the student was in his grade 12 year and he was still resident, we wanted to provide support as he transitioned to a new province.*” Without evidence of residency nor the provision of support services aligned with the criteria this student claim was verified as ineligible from any funding claims.
- There were inconsistencies in meeting the Ministry criterion for IEPs. The Individual Educational Plans (IEP) written at HCOS were in transition to a competency-based IEP format. The auditors found that in many instances the IEPs:
 - Did not indicate how the goals and objectives would be measured.
 - The goals did not correspond to the category in which the student was claimed.
 - There was no alignment with the IEP goals and the information on the Instructional Support Planning Tool.
 - The objectives were strategies.
- The student sample included 10 adult claims (those who are 19 years of age before July 1 - the start of the school year). The eligibility for reporting adult funding claims must be in accordance with the: [Adult Non-Graduated Funding Policy-Independent Schools](#) policy. Of the 10 student claims it was verified that the majority of the adults were not undertaking eligible courses nor a program towards graduation. The HCOS staff instead focused on one segment of the policy that was specific to special needs despite the overall funding eligibility considerations. The staff provided the audit team with a document entitled “Extended Enrolment – SE” which contained language only aligned with special needs and not the overarching directive of eligible courses and towards a recognized B.C. graduation program.
 - The overall eligibility for independent school authorities to be able to claim non graduated adult students (including those with special needs) is from the Adult Non-Graduated Funding Policy: “***Non-graduated adult students enrolled in an Independent School are funded for eligible courses leading to the British Columbia Certificate of Graduation (the Dogwood) or leading to the Adult Graduation. For non-graduated adult students, eligible courses include Ministry Authorized courses and Board/Authority Authorized courses leading towards a British Columbia Certificate of Graduation.***”
 - While the policy goes on to state special education funding considerations, the primary consideration for an eligible adult funding claim is that these non-graduated adults are to be enrolled only in courses towards a B.C. graduation program. While school age, the student may have been on the School Completion Certificate path, yet once the student is categorized as an adult, schools must follow the funding eligibility directives specific to non-graduated adults before any funding claims can be made for educational programming as well as any special needs supplemental funding.
 - Any funding considerations for non-graduated adults must be in accordance with all adult related directives as well as the [Form 1701 Instructions](#) which says: Students born prior

to July 1, 2002 are considered adult students. ***Adult students who are taking Ministry-Authorized or Board/Authority Authorized courses that lead to a graduation diploma may be reported and funded. Eligible courses will be funded if they are documented on a Course Enrolment Form and the student meets the attendance definition and the funding eligibility requirements set out in the Adult Non-Graduated Funding Policy.***

Further and specific to special needs claims it says: *Students with Special Needs - For the 2021/2022 school year, students who are non graduates over the age of 19 who: 1) have special needs; and 2) were reported in 2020/21; and 3) are, in accordance with the Adult Non-Graduated 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.*

- The sampling of student claims signed off by the school authority confirmed there were students reported with special needs designations by HCOS yet were not recognized as the school of record at the September 2021 claim date. Of the 30 Code D claims in the sample, six students identified through the Ministry's data source indicated the school of record was not HCOS. Of the 30 Code G claims in the sample, nine students identified through the Ministry's data source indicated the school of record was not HCOS. All 15 claims were also reported by secondary schools in September for the majority of course claims. It was further verified that none of the secondary schools reported these students with special needs designations, including Heritage Christian School who reported one student for four courses which was in addition to the one course and a Level 2 designation supplemental claim by HCOS.
 - HCOS provided typed anecdotal statements for 12 students. Amongst the information provided were various statements based on previous school years and enrolment assumptions for the 2021/22 school year. There was no actual evidence provided to verify the statements presented at the time of the audit.
 - The HCOS staff stated that for the September 1701 count they claimed course(s) in which the student had completed the activation attendance requirement. In many cases this would be one course as HCOS continuously enrolls students adding additional courses throughout the year as students meet the activation criteria for each course. Many of the students were still working on courses that they had started in the previous year.
 - The auditors reviewed approximately 20% of the sample identifying a selection of student claims where the active participation had not been met by the claim date.
 - The typed course list provided by HCOS dated March 3, 2022 contained course enrolment dates as well as activation dates. It was verified that a number of examples often did not align with the actual claims reported in September. To ensure eligibility of claims the Form 1701 Instructions says: *“Courses encompass only one organized set of learning standards. While completion of the course's learning outcomes may be over a number of registration periods, only one course is undertaken and therefore eligible for only one funding claim.”*
- HCOS has supports for students claimed in Special Education low incidence categories. These supports include behavioural interventions, educational assistance, music and art therapy. With the information provided by HCOS, the auditors found that the supports, for the claims in the sample, were appropriate for the category in which the student was claimed.

- The auditors found evidence that students enrolled in HCOS were receiving support services through tutors. The HCOS procedures state: *Tutors offer support in the subject area under the direction of the HCOS teacher responsible for the course. Tutors are an additional support and do not take the place of any of the HCOS teacher role. It is the responsibility of the Teacher or LS Consultant to ensure that the tutor chosen for the student is competent to provide support in the subject area and is a good fit for the student.* The information provided indicated two categories for the use of a tutor (a tutor request): professional tutor for specific specialized programming (i.e., sign language), or an educational assistant cannot be found to support a specific subject area.

Recommendations:

The auditors recommend that:

- The HCOS staff immediately discontinue reporting non-graduated adult claims that do not meet the Form 1701 Instructions and the [Adult Non-Graduated Funding Policy-Independent Schools](#) policy directives. For funding eligibility, there must be adherence to the Eligible Course segment *“For non-graduated adult students, eligible courses include Ministry Authorized courses and Board/Authority Authorized courses leading towards a British Columbia Certificate of Graduation (the Dogwood) or the Adult Graduation Diploma (the Adult Dogwood)”*; and refrain from focusing only on a subsection of the policy that speaks to special needs without the main criteria for eligibility being met. To be considered as eligible for any non-graduated adult funding claim including a special needs supplemental claim the policy in its entirety must be followed including the policy statement: *Non-graduated [adult students](#) enrolled in an Independent School are funded for eligible courses leading to the British Columbia Certificate of Graduation (the Dogwood) or leading to the Adult Graduation Diploma (the Adult Dogwood).*
- In order to report a student in a special needs category at the time of the Form 1701 Data Collection submission, the student must meet the online active participation attendance requirements and a plan for the delivery of services must also be evident at the time of the claim period as per the Form 1701: Student Data Collection Completion Instructions for Independent Schools.
- The HCOS staff ensure that at the time of the Form 1701 submissions, there is the required evidence in place to support that students have been appropriately assessed and identified as meeting the criteria listed in the Special Education Services Manual of Policies, Procedures and Guidelines for the reported category.
- HCOS staff ensure the accuracy of all reported claims before remitting for funding.
 - The staff ensure all student claims align with and have evidence to support B.C. residency in accordance with the [Independent School Regulation](#).
 - School age students along with their parent/legal guardian verified as B.C. residents are the only students who are eligible for a funded education. Only those individuals who have been verified by school authorities as ordinarily resident in B.C. are eligible in accordance with the Independent School Authority directives: *“eligible student” means a student who is of school age, and whose parent or guardian is, or was at the time of that parent’s or guardian’s death, a citizen of Canada or a permanent resident, as defined in the Immigration and Refugee Protection Act (Canada), who is or was at the time of the parent’s or guardian’s death, ordinarily resident in*

British Columbia, or is lawfully admitted to Canada and is ordinarily resident in British Columbia. Ultimately it is an independent school authority's responsibility to have evidence which verifies B.C. residency for those students reported for grant funding.

- The HCOS staff ensure any student claims in Code D meet the criteria listed in the Special Education Manual of Policies Procedure and Guidelines including the following:
 - For consideration of a physical disability or chronic health impairment based on the need for special education services, 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 the student's education and achievement.
 - A medical diagnosis by itself does not determine the need for special educational services by students with physical disabilities or chronic health impairments.
 - Student claims are only eligible for funding in this category if the student's functioning and education is significantly affected by their physical disabilities or chronic health impairments. It is the extent and impact of the physical/medical condition on the student's functioning and the consequent need for services which enable the student to access an educational program and participate in a meaningful way, that are the determinates.
 - A diagnosis of Complex Developmental Behavioural Condition requires that a clinical diagnostic assessment be made by a Complex Developmental Behavioural Conditions (CDBC) Network or by qualified specialists (psychiatrist, registered psychologist with specialized training, or the medical professional specializing in developmental disorder).
 - The assessment must include and integrate information from multiple sources and various professions from different disciplines that indicates the complex developmental behavioural conditions are exhibiting an array of complex needs, with two or more domains being impacted.
- The HCOS staff ensure there are documented procedures for determining the School of Record for students who are cross enrolled, including actual evidence to support the school's assertions.
- The HCOS staff ensure that all IEPs are in accordance with the Special Education Services Guidelines, the [IEP Legislation](#) and the Form 1701 Instructions, including:
 - Clear and measurable goals and objectives in alignment with the category in which the student is identified.
 - Strategies and objectives that are clearly distinguishable as two separate elements of the IEP.
 - Methods for measuring student progress in relation to the IEP goals (goals must be measurable).

- When partnering with outside support services, HCOS staff adhere to the current [Independent School Authority's Online Learning Standards](#) which says: *the student's IEP must describe the tutoring services required.*
- The HCOS staff adhere to the Form 1701 Instructions when reporting course claims including the one-time funding claim for ongoing learning over a number of data collection periods and that students are not allowed to take the same course at the same time during the funded school year whether in different schools or the same school.
- Given the IEP findings during the special needs audit, the HCOS staff be required to undertake a school funded, Ministry sanctioned compliance workshop to aid with accurate transition planning and creation of competency-based IEPs.

Auditors' Comments

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