Ministry of Education and Child Care
Resource Management Division

2021/22 Special Education Enrolment Audit

AUDIT REPORT

KLEOS Open Learning
(02396719)

2021/22 SPECIAL EDUCATION ENROLMENT AUDIT REPORT
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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 KLEOS Online Learning February 22 to 24, 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.

KLEOS reported 255 students in special education categories at the Fall 2021 Form 1701 data submission. For the purposes of this audit, 48 student records were reviewed in the following low incidence special needs categories:

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

An exit meeting was held with the school's Director and Principal on February 24, 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 any reclassifications for the 2021/22 school year, and expressed appreciation for the assistance provided.

<u>Observations:</u>

There were no recommended reclassifications for the student files reviewed by the auditors.

The auditors found that:
- All files were well organised and in most instances evidence to validate the claim was available.
- In the cases where more information was needed, clarifications were provided and the evidence aided the claim verification process.
- There was evidence that each student had a document labelled as a Personalized Learning Plan in addition to the IEP.
- There was evidence of timely assessments and files had the diagnosis flagged.
- There was evidence of transition plans for high school students.
- Evidence of British Columbia (BC) residency in accordance with the school's policy/procedures was reviewed in an attempt to verify student claims met the definition of 'eligible student' in the [Independent School Regulation](#).
  - From the information provided to the auditors, staff at KLEOS request a copy of some type of provincial identification. While not identified during the audit or through the actual sample, if a BC identification document was not available to verify residency, the school also requests additional documentation. Parent/guardians are also to sign a legal residency form indicating they reside in BC.
  - Each student file had a copy of the parent's driver's license or in one case a copy of a Hydro bill stating a BC address. This evidence was dated for the 2021/22 school year.
- There was minimal evidence verifying the methodology of the sampled claims meeting the online active participation at the September 29, 2021 claim date. The sample audited totalled 48 student claims with 29 students reported as K-9 and Elementary Ungraded along with 19 student claims in Grades 10 to 12.
  - The school staff shared the procedures to be used to determine if the student met the active participation attendance requirement at the Form 1701 claim date:
    - Students complete assignments to demonstrate engagement in programming, including a collection of anecdotal notes, evidence of parent collaboration, communication logs, evidence of services commencing, evidence of student access to customized learning programming in online classrooms, etc.
    - Teachers develop a personalized learning plan and an IEP.
- Files contained an accounting of the hours, types and cost of supports being provided to the student.
- Supports for students at KLEOS are to be in accordance with the KLEOS' Special Education Handbook indicating that a school-based team approach is used to determine supports for students. The school-based team are to include the case manager, school principal, special education coordinator, resource teacher, teacher, and educational assistant. According to the Handbook, on a case by case basis the team is also to include the student's referring teacher,

and involve the parent, the student, and as appropriate, resource staff in the case of cross enrolled students and representatives from community services, regional authorities, or from other ministries. The Handbook continues to identify that upon the request of the referring teacher or parent, the school based team provides support through extended consultation on possible learning strategies and may become a central focus for case management, referrals, and resource decisions. A case manager is to be appointed to identify the need for additional services and/or initiate referrals to access other school, community, or regional services. Teachers/case managers are to meet with support service providers prior to any student services commencing so service providers have a clear understanding of the student's IEP goals and objectives. Collaboration between teachers/case managers and service providers is encouraged for integrated and effective support.

- From the information provided at the time of the audit, support services were found to be appropriate for the sampled special needs students. The supports included:
  - Educational assistance, behavioural intervention, music therapy, equine therapy, speech therapy, occupational therapy, counselling and physiotherapy, communication aides and equipment and specialized computer software and hardware.
- For students identified with highly complex needs the school partners with two outside service providers: Claro and Brain Boost. The KLEOS staff provided the following anecdotal commentary regarding these partnerships:
  - KLEOS teachers are to provide all academic programming for KLEOS students, regardless of which services they are supported by in the community.
  - KLEOS teachers are to deliver academic programs online through the school's learning management system, Canvas (where they plan, deliver, instruct, assess, and report in this virtual classroom).
  - KLEOS teachers develop IEPs with the support of KLEOS resource teachers.
  - All service providers, whether at-home educational assistants or through the Learning Centres, receive contracts with the same requirements outlining that services provided are to support the IEP and follow the direction of KLEOS teachers' developed programs.
- The files reviewed at the time of the audit were identified as meeting criteria for Physically Dependent and from the evidence provided were receiving supports. Yet, for two Code A claims it was not clearly stated on the Individual Education Plan (IEP) that the students required assistance at all times for meeting all major daily living needs.
- For a Code E claim, the involvement of a teacher of the visually impaired providing services was not apparent on the IEP. Upon request, staff were able to provide the teacher's notes and support schedule.
- For Code D, while one claim had evidence of medical documentation identifying two areas of impact, the IEP did not clearly state goals for those areas.

Recommendations

- As an online facility -
  - KLEOS staff ensure all students are enrolled and active as at the claim date and in accordance with the Online Active Participation Policy and Form 1701 Instructions.
  - For Grade 10 to 12 student claims, the KLEOS staff ensure that courses are claimed only when the active participation criteria are met for each course and aligned with the Form 1701 Instruction directives.

- ▪ KLEOS staff ensure that no claims for funding are submitted for students who have not met the requirements of the Online Active Participation Policy.
- ▪ KLEOS staff ensure there are clear and consistent guidelines and practices for determining where the minimum five percent substantive student course activities reside for Grade 10 to 12 claims in accordance with the Online Active Participation Policy requirements.
  - o *For each eligible course reported for funding, substantive student course activity is submitted to the teacher. This course activity directly links to the curriculum learning standards and/or outcomes required in each course.*
  - o *Learning management system, digital, or paper-based evidence includes one or more activities demonstrating that a minimum of five per cent of each course's learning activities have been covered.*
  - o *The following learning management system, digital or paper-based evidence must be readily available:*
    - ✓ *The gradebook or other tracking system must contain a dated record of the teacher's evaluation of the student's performance on the course activity or activities. (Where gradebooks or tracking systems do not support dated entries, then alternative dated information is required, such as logs, copies of students' substantive course activity, or copies of teachers' dated observation, feedback and marking details.)*
    - ✓ *The course or program instructions and materials associated with assignments or course work for these activities or assignments must be accessible. (These materials must include a sample of substantive student course activity for the course reported for funding and a copy of the teacher's observations, feedback and marking details for the activity or activities.)*
- KLEOS staff ensure all funded options align with the current curriculum and that course selection/enrolment forms for Grade 10-12 student claims are in evidence and identify only those online courses reported for funding that meet graduation requirements.
  - ▪ Based on the evidence provided of student/teacher engagement, the school staff ensure the directives aligned with the role of the teacher in the [Independent School Authority's Online Learning Standards](#) are adhered to including the following: *2.2.3 Teachers evaluate and assess Learner progress based on their professional assessment and where appropriate input from parents or guardians and the Learner is received. Assessment is both of learning and for learning, i.e., assessment is used to describe relative mastery but it is also used as a feedback tool to correct student misunderstandings and diagnose required remediation. It must be frequent and timely with teacher feedback and follow-up. 2.2.4 Teachers are responsible for reporting assessment results and learner progress – both the quantity of work done and how that relates to ministry or authority learning outcomes as well as the quality of that work based on achievement indicators, rubrics, Performance Standards, and Quick Scales.*
- KLEOS staff be required to ensure the accuracy of all reported claims before remitting for funding.
  - ▪ The school staff ensure all student claims align with and have evidence to support BC residency in accordance with the Independent School Regulations.
  - ▪ School age students along with their parent/legal guardian verified as BC 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 BC 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 BC residency for those students reported for grant funding.

- When partnering with outside support services for students with highly complex needs, the school adhere to the current [Independent School Authority's Online Learning Standards](#) which says: *the student's IEP must describe the tutoring services required.*
- The school staff ensure that all IEPs in Code A clearly state the student's current level of functioning in each of the areas of feeding, dressing, toileting, mobility, and personal hygiene. The IEP must outline methods for measuring the student's progress in relation to the IEP goals and goals must be measurable.
- The school staff ensure that IEPs for students in Code E, Visual Impairment, clearly state the services provided by a qualified teacher of the visually impaired and that this information be in evidence.
- For students claimed in Code D, Physical Disability/Chronic Health, the school staff consider using the Instructional Support Planning tool for IEP planning in order to ensure impacted domain areas are reflected in the IEP goals.
- The school continue to:
  o maintain organized files.
  o ensure that all IEPs measure and report on goal and objective attainment each term.
  o provide information on the hours, type, and cost of support for each student.
  o ensure IEPs have transition goals.

Auditor(s') Comments

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

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