



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

2021/22 Special Education Enrolment Audit

AUDIT REPORT

**Traditional Learning Academy Online
(03696720)**

2021/22 SPECIAL EDUCATION ENROLMENT AUDIT REPORT Traditional Learning Academy Online (03696720)

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 Traditional Learning Academy (TLA) Online March 7 to 11, 2022.

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

TLA Online reported 295 students in special education categories at the Fall 2021 Form 1701 data submission. For the purposes of this audit, 61 student records were reviewed in the following low incidence special needs categories:

Headcount	Category
2	Physically Dependent (Code A)
1	Moderate to Profound Intellectual Disability (Code C)
20	Physical Disability or Chronic Health Impairment (Code D)
31	Autism Spectrum Disorder (Code G)
7	Intensive Behaviour Intervention or Serious Mental Illness (Code H)

At the entry meeting, the Principal and the Learning Support Services Vice Principal described three types of programs the school provides for students with special needs: the Personalized Home Learning program for Kindergarten through Grade 9; the Blended Learning program that involves a combination of home learning and classroom-based instruction in the community

within a collaborative and project-based learning framework; and the Online Graduation program for Grades 10 to 12. There is a Grad Adapted Program for students in Grades 10 to 12 who require specialized adaptations and learning resources in reading, written output, and executive functioning skills to graduate with the B.C. Dogwood diploma and a modified learning program for students with complex learning needs. Service providers are added to a student's support plan based on assessed and observed needs. Service provision is determined by the Learning Support Services teacher/case manager and the Learning Support Services Vice Principal in consultation with the parents/guardians.

The file review process confirmed the range of programs described at the entry meeting and included detailed descriptions from service providers about planning, amount of service, and reporting on student progress. Service providers included contracted behaviour consultants, registered psychologists, counsellors, occupational therapists, physical therapists, and paraprofessionals, including behaviour interventionists and education assistants.

The Principal and Learning Support Services Vice Principal described the following process for determining proof of B.C. residency, student activation, and the school of record for students.

Proof of Residency

The Principal shared the school's process for verifying that a student along with parent/guardian are ordinarily resident in B.C. There was a file in online folders for each student that contained what the school utilized as evidence of residency including a Legal Residency form and additional documentation such as:

- B.C. Health Card
- Immigration Status
- Permanent Residency
- Utility bill from the parent/guardian's place of residence
- Letter of employment from employer

Student Activation Attendance

Evidence of student meeting the online attendance requirement by September 29th was provided to auditors in a variety of formats, including:

- For students in Kindergarten to Grade 9 and students on a modified program in Grades 10 to 12 was a collection of work samples.
- For students in Grades 10 to 12 was evidence of assignments submitted to each teacher.
- Weekly logs of communication with parents.
- Reports from service providers within the first three to four weeks of service that described the frequency of service, goals, and initial observations.

School of Record for Students in Grades 10 to 12

The Principal shared the process to be used for determining the school of record for cross-enrolled students in Grades 10 to 12. The process is to be based on the following conditions being met:

- The student is enrolled in more classes at TLA than any other school.
- The previous school of record transfers the student files to TLA and releases the student in MyEdBC.

- Parents sign consent forms identifying TLA as the school of record for a given year.
- Students are active in XSIIEP courses and accessing therapeutic supports through TLA.
- TLA is the school of record in MyEdBC, and there is no duplicate school showing in MyEdBC at the time of the 1701 data submission.
- If a duplicate report is received, TLA communicates with the other school regarding the assignment of the school record.

The file review process encountered issues requiring a meeting. The first was related to assessment criteria for students reported in Code D. For two students in Code D there was no evidence in the student files to support the diagnostic criteria for the Physical Disability/Chronic Health Impairment category. For one student, the report of a medical diagnosis by a medical specialist was available upon request. For the second student, there was evidence of a mental health diagnosis by a mental health professional and was found to meet the criteria for reclassification to Students Requiring Behaviour Support, or Students with Mental Illness (Code R).

The second issue was related to Code H, in which planning must be coordinated across agency and community with integrated case management/wraparound service. There was no evidence of integrated case management for three students in Code H.

The third issue was related to the Ministry of Education and Child Care directives for Individual Education Plans (IEPs). There were IEPs that did not contain the required measurable objectives or a method of measuring progress towards the objectives. Some IEPs did not include required goals that corresponded to the category in which the student was reported. For service providers listed on the IEP, there was no required evidence of student support.

The Learning Support Service Vice Principal was the key contact throughout the audit and was able to provide the audit team with clarifications. Short meetings at the end of each day with the Principal and the Learning Support Services Vice Principal enabled the audit team to keep the school staff apprised of the audit progress.

An exit meeting was held with the Principal and the Learning Support Services Vice Principal on March 11, 2022. The auditors reviewed the purpose of the audit and the audit procedures, 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 and Code C.

Of the 20 student files reviewed by the auditors in Code D:

- One student was recommended for reclassification to Code R.

Of the 31 student files reviewed by the auditors in Code G:

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

- One student was recommended for reclassification to Code D.

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

- Three students were recommended for reclassification to Code R.

The auditors found that:

- For one student claimed in Code D, there was no evidence of a medical diagnosis of a physical condition or chronic health impairment made by a medical practitioner (pediatrician, psychiatrist, neurologist, or a medical professional specializing in developmental disorders). Nor was there a diagnosis of complex developmental behaviour condition made by a qualified medical specialist in consultation with a multidisciplinary team of specialists. There was evidence of a generalized anxiety disorder and a post-traumatic stress disorder diagnosed by a registered psychologist as well as evidence of service provision by an education assistant. This student was recommended for reclassification to the Students Requiring Behaviour Support or Students with Mental Illness category (Code R).
- For two students reported in Code G, there was no diagnosis of autism.
 - For one student, while there was a diagnostic report from a pediatrician which provided a diagnosis of a Physical Disability/Chronic Health Impairment of Ehlers-Danlos Syndrome, musculoskeletal discomfort and pain, ADHD, and migraines, there was evidence in the file that the parents declined provision of services. As there was no evidence of service, the student was recommended for declassification from any special needs category.
 - For the other student reported in Code G, there was evidence of an assessment by a multidisciplinary team including a pediatrician and registered psychologist that gave an FASD diagnosis. As there was evidence that met the diagnostic requirements, IEP and service provision that aligned with Code D, the student was recommended for reclassification.
- For three students reported in Code H, there was no evidence that planning was coordinated across agency and community using integrated case management/wraparound service. These three students were recommended for reclassification to Code R as there was evidence of a mental health assessment by a mental health professional as well as IEP goals that met the Students Requiring Behaviour Support or Students with Mental Illness category criteria.
- There were inconsistencies in meeting the Ministry criterion for IEPs.
 - Some IEPs did not contain goals corresponding to the Code in which the students were reported.
 - Some IEPs did not contain measurable objectives. Objectives were not specific or individualized, and the progress reported did not always match the objectives.
 - The IEPs in the Competency-Based format did not contain a method of measuring progress towards IEP objectives. IEPs in the traditional format did identify methods of measuring progress.
 - A few IEPs did not identify a specific day for creating the IEP and only listed a month and year.
 - There were some inaccuracies in the list of service providers on the IEPs. There were instances where there was no evidence that the service providers worked with the students as well as other occurrences where services provided were not included on the IEP.

- There were IEPs that did not specify if the student participated in an adapted or modified program. Other documents such as the IEP meeting notes, teacher tracking spreadsheets, student transition plans, report cards, and Consent for Modification provided this information.
- Contrary to the procedures relayed by TLA staff regarding the process used for determining the school of record for cross-enrolled students in Grades 10 to 12, the sampling of student claims signed off by the school authority confirmed there were students reported with special needs designations by TLA yet were not the school of record at the September 2021 claim date. Two students (taking one course and a half course respectively) claimed in Code D and one student taking a single course claimed in Code G who were also reported by public 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.
- The school had consistent evidence of student and parental participation in the IEP development and review process. The Parent/Guardian Confirmation forms were completed for all students. Student and parent input was sought in developing the IEP goals and in the Transition Plans for students in Grades 10 to 12.
- There was a broad range of community-based services offered to families. Summary reports were provided by the service providers on a regular schedule.
- The Grad Adapted Program provided offerings of resources, assignments, and universal adaptations to students with diverse needs and disabilities. Students in the Grad Adapted Program had fewer teachers to work with: one core teacher, a mathematics teacher, and an electives teacher.

Recommendations:

- As an online facility –
 - TLA 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 TLA 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.
 - TLA staff ensure that no claims for funding are submitted for students who have not met the requirements of the Online Active Participation Policy.
 - TLA 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.
 - *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.*
 - *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.*
 - *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.)*
- TLA 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.
 - 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.*
- TLA 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 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.

- The school staff ensure that any student claims in Code D 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 by a medical specialist 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 students' education and achievement.
- The school staff ensure that any student claims in Code G meet the criteria listed in the Special Education Manual of Policies Procedures and Guidelines for that category. There must be evidence that the student has had an autism spectrum disorder diagnosis by appropriately qualified professionals from a B.C. Autism Assessment Network or a qualified specialist (registered psychologist, paediatrician, neurologist, or psychiatrist) with broad experience in diagnosing children with autism and developmental disabilities. The assessment must include and integrate information from multiple sources and various professions from different disciplines. The current provincial standards can be found here: <http://www.phsa.ca/healthpro/autism/default.htm>.
- The school staff ensure that prior to the identification of a student in a special needs category at the time of the Fall 1701 Data Collection submission, the student must meet the attendance requirements for online learning and be actively participating in their K-9 educational program or have met the active participation requirement for each Grade 10 to 12 course claim. A plan for the delivery of special needs services must be evident at the time of the claim period as per the Form 1701: Student Data Collection Completion Instructions for Independent Schools.
- The school staff ensure for all students reported in Code H that planning is coordinated across agency and community using integrated case management/wraparound service as identified in the Special Education Services Manual of Policies, Procedures, and Guidelines.
- The school staff develop a system for recording integrated case management that shows evidence of planning across-agency and community for students reported in Code H.
- The school staff ensure all student files have appropriate detailed assessments and support services that align with the reported category in accordance with the criteria outlined in the Special Education Manual of Policy, Procedures, and Guidelines.
- The school staff develop a robust annual review process to ensure student documentation meets all the criteria for the category in which the student is reported.
- The school staff ensure that all IEPs are in accordance with the IEP directives including the [Form 1701 Instructions](#), the [Educational Standards Order](#) and the Special Education Services Manual of Policies, Procedures and Guidelines. There must be:
 - Goals that corresponded to the category in which the students are reported
 - Objectives that are measurable
 - Methods of measuring progress towards IEP objectives
 - Accurate and up to date service provision information
 - Courses and/or academic goals that are adapted or modified
 - A specific date for the creation of the IEP

- The school staff maintain meaningful consultation with parents/guardians and students in the preparation of the IEP and transition plans.
- The school staff continue a range of services and programs that meet the diverse needs of students.
- The school staff follow their stated practices to ensure TLA is the school of record for student claims that include the reporting of special needs designations.
- The school staff be required to undertake a Ministry sanctioned workshop on category designation requirements aligned with the Special Education Services Manual of Policies, Procedures, and Guidelines as well as writing competency-based IEPs given the IEP findings at the time of the audit.

Auditor(s)' Comments

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