



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

2022/23 Special Education Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 41 (Burnaby)

2022/23 SPECIAL EDUCATION ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 41 (Burnaby)

Background

The Ministry of Education and Child Care funds boards of education based on the boards' reported enrolment as of September 30th 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).

In the 2022/23 school year, school boards reported 38,581 students enrolled in the low incidence supplemental special education funding categories at September 2022. School District No. 41 (Burnaby School District) reported 1,398 students in the supplemental special education funding categories as of September 29, 2022. For the purpose of this compliance audit, School District No. 41 (Burnaby School District) reported 28 student claims in the Physically Dependent Category (Code A), two student claims reported in the Deafblind Category (Code B), 31 student claims in the Moderate to Profound Intellectual Disability Category (Code C), 333 student claims in the Physical Disability or Chronic Health Impairment Category (Code D), 14 student claims in the Visual Impairment Category (Code E), 57 student claims in the Deaf or Hard of Hearing Category (Code F), 804 student claims in the Autism Spectrum Disorder Category (Code G), and 129 student claims in the Intensive Behavior Intervention/Serious Mental Illness Category (Code H).

The Ministry of Education and Child Care 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.

Purpose

The purpose of the Special Education enrolment audit is to provide assurance to the Ministry of Education and Child Care 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 Special Education enrolment audit was conducted in School District No. 41 (Burnaby) during the week of January 23, 2023.

An entry meeting was held on January 23, 2023 with the Superintendent of Schools, Deputy Secretary Treasurer, Assistant Superintendent, Director of Instruction-Learning Support

Services, Acting Director of Instruction-Learning Support Services, two additional Directors of Instruction, District Principal-Alternate Education Programs, District Principal-Learning Support Services, and the District Vice Principal-Learning Support Services.

Daily meetings with the Assistant Superintendent were held to present preliminary findings and to seek clarification related to the contents of the files.

A sample of 28 student files reported in the Physically Dependent category (Code A), two student files in the Deafblind (Code B), five student files in Moderate to Profound Intellectual Disabilities (Code C), 50 student files in Physical Disability or Chronic Health Impairment (Code D), five student files in Visual Impairment, five student files in Deaf or Hard of Hearing (Code F), 35 student files in Autism Spectrum Disorder (Code G), and 50 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.

Two members of the audit team met with the District Principal and Vice Principal of Learning Support Services. The meeting was held to answer questions regarding the District's Connect Program. The program is in eight of the District's schools and is designed "*Similar to a resource room, but is more fluid so students can connect in real time as needed.*" Entrance into this program is based on need and is done in consultation with case managers, parents and school administration. Learning Support teachers and Educational Assistants (EAs) are assisting in the classroom. A tiered intervention approach is used so that designated students receive a higher level of assistance.

Three members of the audit team met with the Assistant Superintendent, District Principal and District Vice Principal of Learning Support Services. The purpose of this meeting was to answer questions the audit team had about the Burnaby Youth Hub Secondary program. The program, located near Metrotown and close to a Skytrain station, is operated in collaboration with the Lower Mainland Purpose Society for Youth and Families. It has a maximum enrolment of 54 students. There are three classroom teachers, a Youth Engagement worker, one part time Indigenous support teacher and one EA. The youth at the Hub have experienced significant mental health or school avoidance issues that have impacted their success in the mainstream school setting. Students participate in highly customized programming to re-engage them in their education and provide a smaller, welcoming environment. Students claimed for supplemental funding in Codes other than H, are provided increased supports and access to social skills training, social stories, and role play.

The auditors reviewed the timetables of three students:

- One Code B student claim was reported for 0.1250 FTE at a secondary school. The evidence showed that the student was also enrolled in a full-time program with courses from Burnaby Online and South Central Interior online learning. The report card indicated the student was active in all courses.
- One Code A student claim was reported for 1.0625 FTE. The evidence showed the student enrolled in six Locally Developed IEP modified course blocks (XSIEP) for a Pre-Employment Program. This program is a multi-grade session that provides class time for

students to address the core academic areas of literacy, numeracy, and science as well as building independence and practical, community-based life skills. The program affords the students the opportunity to participate inclusively in elective classes.

- One Code H student claim of 0.1250 FTE was reported in error by the District and had transferred out of Continuing Education.

An exit meeting was held on January 27, 2023 with the Superintendent of Schools, Deputy Secretary-Treasurer, two Assistant Superintendents, Director of Instruction-Learning Support Services, Director of Instruction, two additional Director of Instructions, District Principal-Alternate Education Programs, District Principal-Learning Support Services, District Vice Principal-Learning Support Services. The auditors reviewed the purpose of the audit and the audit criteria, reported their findings, clarified any outstanding issues, discussed reclassifications for the 2022/23 school year, and expressed appreciation for the assistance provided.

There were no recommended reclassifications in Code A, Code B, Code C, Code E and Code F.

Of the 50 student files reviewed by the auditors in Code D:

- one student was recommended for reclassification to Code Q
- one student was recommended for declassification

Of the 35 student files reviewed by the auditors in Code G:

- one student was recommended for reclassification to Code R
- one student was recommended for declassification

Of the 50 student files reviewed by the auditors in Code H:

- three students were recommended for declassification

Observations

The auditors found that:

- There were several forms that were of assistance with the verifications:
 - Developing Student Independence Chart
 - Running Records of Meetings
 - Assessing and Supporting Learning in a Universal Classroom
 - District Designation and yearly Review Form for Category H Students
 - B.C. Core Competency Self Assessment
 - Integrated Case Management Plans
- There was inconsistency in the organization of the files which made finding some of the information difficult.
- Many of the files did not have transition goals for students in Grade 12.
- Many of the Individual Educational Plans (IEPs) did not have measurable criteria for the objectives nor evidence of assessment of goal achievement.
- The form used to document attempts to engage community agency support for Code H claims was filled out in various ways. The District requires three attempts to engage an outside agency and the expectation is for those attempts to be written down in detail. Some

files indicated three attempts had been made, yet in many files there was no evidence of who was contacted, when the contact was made, or the outcome of the conversation.

- In Code D, there was one student claim for whom the auditors sought evidence that the chronic health impairment significantly impacted the student's functioning and education. The evidence showed the student had not received delegated care from Nursing Support Services since 2018. There was no evidence the student's functioning and education was significantly affected by a chronic health impairment given the student was receiving As and Bs on the most recent report card. There was no evidence of services being provided to address the chronic health impairment and was recommended for declassification from any special education category.
- For one student claim reported in Code D there was no evidence of significant services to address the needs identified in the assessment documentation that are beyond those offered to the general public. The Grade 10 student was assessed as a seven-year-old. The recommendation was for a follow-up psychoeducational assessment. There is no evidence of any recent assessments, the current functioning levels reported on the Instructional Support Planning Process (ISPP) were all in the mild range and the report card listed Bs and Cs. There was evidence that the student refused weekly or bi-weekly check-ins with the case manager. In reply to an audit clarification query, the District staff stated, "*No Services*". As there was evidence of a diagnosis of a Learning Disability, the student claim was reclassified to Learning Disability (Code Q).
- For one student claim in Code G there was no evidence they were attending as of the September 29, 2022 claim date. The student was enrolled in an Alternate Education Program with a history of non-attendance. The School knew the student well and were reaching out via email to remain in contact with the family. There was evidence of weekly contact with the family by the school via email or telephone throughout the month of September. This type of contact continued through October, November and December, but the student did not attend. There was no evidence of supplemental services aligned with the category claimed nor of any educational programming provided by the reporting Alternate Education facility. Without evidence to meet the Special Education Guidelines at the claim date, the recommendation was for declassification and recovery of the student headcount claim.
- For one Code G claim there was no evidence of a diagnosis of Autism Spectrum Disorder (ASD). There was evidence verifying the Code G claim was an error with the District intending to claim the student in the Students Requiring Behaviour Support or Students with Mental Illness category (Code R). Based on the evidence, the recommendation was reclassification to Code R.
- For one Code H student claim there was no evidence of planning coordinated across agency and community (integrated case management/wraparound) as required by the Special Education Service Manual of Policies, Procedures and Guidelines. There was no evidence of a current referral to an outside agency. While the District was asked for evidence to confirm a current referral had been made to an outside agency, this evidence was not provided. Without evidence to meet the Special Education Guidelines at the claim date, the recommendation was for declassification.
- For one Code H student claim there was no evidence of planning coordinated across agency and community (integrated case management/wraparound) as required by the Special Education Service Manual of Policies, Procedures and Guidelines. The student's IEP listed the school case manager, the Indigenous Success teacher and the school counsellor as the

support team. When asked for evidence of an outside agency providing wrap around services, the District verified there was no further information to support the claim. Without evidence to meet the Special Education Guidelines at the claim date, the recommendation was for declassification.

- For one Code H student claim there was no evidence of either antisocial, extremely disruptive behaviour over time or severe mental illness. There was no evidence of an IEP or of planning coordinated across agency and community. The student was attending a Continuing Education program and had recently transferred to another program. The District stated, *“In September the student transferred and the designation should have been removed.”* Given the verification by the District staff, the recommendation was for declassification.

Recommendations

The auditors recommend that:

- The District staff consider implementing a process for standardizing file organization.
- The District staff ensure that IEPs have transition goals when appropriate and that all objectives have a method of measurement and regular reporting on goal/objective achievement.
- The District staff consider establishing expectations for filling out/completing the Documented Attempts Form for Community Agency Support for Category H Students.
- The District staff ensure that all students claimed in Code D have documentation that the student’s functioning and education is significantly affected by their physical disability or chronic health impairment and that the extent and impact of the medical condition is such that there is a need for significant support services.
- The District ensure that all students claimed on the Form 1701 are enrolled and attending as at the September claim date.
- The District staff ensure that all students claimed in Code G meet the Special Education Guidelines. There is to be documentation of a diagnosis of ASD made by appropriately qualified professionals: BC Autism Assessment Network (BCAAN) or a paediatrician, psychiatrist or registered psychologist whose assessment meets Standards and Guidelines and adopted BCAAN policy changes.
- The District staff ensure that students claimed in Code H fully meet the criteria as stated in section E.5 for the Special Education Manual of Policies, Procedures and Guidelines. Specifically, there is documentation to support that the student has been appropriately assessed using a behavioural assessment or a mental health assessment, and there is evidence that indicates either antisocial, extremely disruptive behaviour over time or severe mental illness. Additionally, there is to be evidence that planning is coordinated across agency and community.

Auditors' Comments

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

**Funding and Financial Accountability Branch
Resource Management Division
Ministry of Education and Child Care
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