



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

2023/24 Special Education Enrolment Audit

**AUDIT REPORT
*REVISED FEBRUARY 13, 2024***

ARTEMIS PLACE SECONDARY SCHOOL (06196827)

**2023/24 SPECIAL EDUCATION ENROLMENT AUDIT REPORT
ARTEMIS PLACE SECONDARY SCHOOL (06196827)**

Background

The Ministry of Education and Child Care funds Independent School Authorities based on the Authorities' reported enrolment as at the Fall Data Collection deadline 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 2023/24 school year, the Ministry of Education and Child Care conducted a Special Education enrolment audit, 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 Artemis Place Secondary School from January 8 to 12, 2024.

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

Artemis Place Secondary School reported 45 students in special education categories at the Fall 2023 Form 1701 data submission date. For the purposes of this audit, student records were reviewed in the following low incidence special needs categories:

Headcount	Category
2	Physical Disability or Chronic Health Impairment (Code D)
2	Autism Spectrum Disorder (Code G)
40	Intensive Behaviour Intervention or Serious Mental Illness (Code H)

One student record was also reviewed in the following high incidence special needs category:

Student Claims	Category
1	Mild Intellectual Disability (Code K)

Artemis Place Secondary School is a special education school that provides Grade 10 to 12 secondary education programming to young women and transgender students.

1. The Counselling Life Skills Program is to provide students with skill-building workshops and various life skill groups such as the Young Parent group, Social Emotional Awareness group and the Q+ Community group. Students are placed with a Youth and Family Counsellor who provides one-on-one outside agency counseling and input for Individual Education Program (IEP) goals and strategies.
2. The Secondary Graduation program is to provide Grade 10 to 12 courses, IEP planning and support services for all students in the school.
3. The Young Parent Program is to support students who are pregnant and young parents. Children are cared for on-site. Early Childhood Educators, Youth and Family Counsellors and a Public Health Nurse provide pre-natal and parenting education, individual and group counselling, and advocacy services.

At the entry meeting the Principal and Program Director provided a presentation that described the referral and intake process, the process for developing IEPs, and the support services provided for the students. A binder with information about the School was provided to auditors and included the 2023/24 Annual Report, the Student Handbook, and the Artemis Place Secondary School Policy.

The Annual Report, Student Handbook and the file review process provided information about the range of support services for students, including counselling, art therapy, music therapy, equine therapy, therapeutic gardening, occupational therapy, and education assistants. The occupational therapist is to provide group and individual sessions focussing on developing body and sensory awareness, social connection, self regulation, and other executive function skills. A weekly Social Emotional Awareness group led by a teacher and counsellor therapist is to provide mental health awareness and strategies, self-regulation and facilitated social connection during nature, gardening, art and equine therapeutic learning opportunities.

The audit review process encountered four issues requiring a meeting with the Artemis Place Secondary School staff.

- The first issue was related to six students for whom there was no evidence of student attendance at the Form 1701 claim date. The required attendance evidence for two of these students were provided upon request. For four of the students reported in the Intensive Behaviour Intervention or Serious Mental Illness Category (Code H), there was no evidence of the students attending nor service provision.
- The second issue was related to students not enrolled in eligible courses. Five adult, non-graduate student files had evidence that the courses were continued from the 2022/23 school year. There was no withdrawal mark on the June 2023 report card. Upon request, the School provided a written explanation of the School's year-end process which included a verbal explanation to students that they would be withdrawn from their incomplete courses. The withdrawal of students from incomplete courses for the 2022/23 school year was done in the 2023/24 school year - on July 4, 2023.
- The third issue was related to special education service provision. Evidence of the service provision was not readily available in the student files. Upon request, schedules, service provider summaries and communication logs were provided.

- The fourth issue was related to IEPs. 11 of the IEPs had only one goal with one to two objectives. Five of the school-aged student IEP goals and objectives were unchanged from the previous school year. Contrary to the adult non-graduate directives, there was evidence adult student IEP goals were not a continuation of their school age goals. Not all service providers were listed in the IEP. Only two IEPs for the students reported in Grades 10 to 12 contained transition goals.

The Principal was the primary contact throughout the audit. At the end of each day meetings were held by the audit team with the Principal and Program Director to keep the School staff apprised of the audit progress and outcomes.

An exit meeting was held with the Principal and Program Director on January 12, 2024. The auditors reviewed the purpose of the audit and the audit criteria, explained the audit reporting process, reported their preliminary findings, clarified any outstanding issues, discussed reclassifications for the 2023/24 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 D, Code G and Code K.

Of the 33 school-aged student files reviewed by the auditors in Code H:

- Three students were recommended for declassification from any special education category.

Of the seven adult non-graduate student files reviewed by the auditors in Code H:

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

(See Appendices for details)

The auditor(s) found that:

- There was evidence of an intake process to determine category designation that consisted of:
 - A referral form completed by a psychiatrist, medical practitioner, social worker, parent/guardian, or student self-referral. The form provides information about the student, school challenges, why Artemis Place Secondary School would be a good fit for the student, who recommended the school, and other pertinent information.
 - Student surveys to provide input about their strengths, challenges, how the student learns best, and the goals they would like to work towards.
 - A collection of necessary assessment documentation.
 - An intake meeting and tour of the school with the student and where possible the parent/guardian.
 - The Administrator and Program Director is to review the student information and assessment documentation, and complete a Screening Determination Form with input from the School Psychologist.
- Evidence showed a comprehensive range of available special education services including: counselling, art therapy, music therapy, equine therapy, therapeutic gardening, occupational

therapy, and education assistants. Service provider notes contained details of the dates of service, focus of the sessions, goals being addressed, and student progress.

- Students reported in the Students Requiring Intensive Behaviour Intervention or Students with Serious Mental Illness Category (Code H) were provided with integrated case management coordinated with the School, family and Youth and Family Counsellors through the Ministry of Children and Family Development. These counsellors provided regular one-on-one support for students and input to IEP goals, strategies, and feedback on progress. The School consistently utilized an Interagency-Collaboration Record to document these services.
- **Students Not in Attendance:**
 - Four student claims in Code H did not have evidence of attending.
 - In the School's annual report dated 2022/23, the policy for attendance (Section 3.2 P.24) states that this School is a self-paced program and attendance is more flexible with Artemis Place than would be found in a standard school environment. It was indicated that attendance is to be taken twice daily and unexcused absences are to be followed up by an email to parent/guardian.
 - The School provided a document from MyEdBC with student attendance. This information was recorded by the clerical staff who received it from the School's teachers. When reviewing teacher records for attendance, there was a disconnect in the dated evidence. Several student records were 'spot checked' against the classroom data but the documentation lacked alignment with the MyEdBC data evidence. In addition to the misalignment of data, was the fact that the students were not in attendance for the first week of school as the staff were doing intakes and IEPs.
 - Most of the absences indicated that students were excused. Students were permitted to do their own attendance/absences by contacting the office or through email.
 - The data provided was difficult to successfully track student attendance requirements per the eligibility requirements set out in the Form 1701 Instructions (P.2). Page 2 of the Form 1701 Instructions states – "*Students are to be reported by the education facility with which they are enrolled and in attendance as at September 29, 2023*". Additionally, while school age students are to meet the [Eligible Student reporting requirements](#) and the [Independent School Regulation 262-89](#), adult non-graduated students are to meet the attendance definition found in the [Adult Non-Graduated Funding Policy](#): *Adult Non-Graduate Eligibility: Eligible courses will be funded if they are documented on a [Course Enrolment Form](#), if the student taking the course(s) meets the [attendance](#) requirements. Where the attendance is on a per course basis and is defined to be over one reporting period AND either 1) a minimum of 10 hours of instruction in a classroom or learning centre for each course or a demonstrated completion of 10% of the course requirements OR 2) meets the Grade 10-12 active participation requirements.*
- **Students Not Enrolled in Eligible Courses:**
 - The School's annual reported (dated 2022/23) outlines the policy for adult graduation requirements (Section 2.8 P.33) which states that adult graduation requirements will follow the government of British Columbia's Legislation and Policy.
 - In conversation with the Principal on January 8, 2024, it was stated that the School uses continuous learning for their students. When asked about new courses for this year, the

Principal advised that the courses are continuous. The Principal did not indicate that the courses were withdrawn at the start of the 2023/24 school year and then re-enrolled in September of the same school year. There was no mention about the disconnect of information on the report cards from the last school year and no mention about withdrawing students.

- There were no report cards for this school year at the time of the audit. The Principal provided a sheet of paper identifying each of the courses the students were taking, the percentage that they had completed, and the teachers wrote on this form to indicate which courses were continuous.
- It was verified that the School maintains the practice for the adult non-graduated students (reviewed at the time of the audit), who had not completed their courses by the end of June were then re-enrolled in the following school year.
- On January 10, 2024, Artemis staff provided ‘transcripts’ to the auditors which the staff indicated identified that the non-graduated adult students were withdrawn from their courses. These documents were dated January 10, 2024, and did not provide evidence of the formal withdrawal dates nor evidence to indicate parents/students were informed. Transcripts provided by the Ministry of Education and Child Care’s TRAX system did not show any evidence of withdrawal as transcripts reflect courses reported by the school to the TRAX system and are completed with a passing grade. Courses with a failing grade or any courses reported as being in progress, where no final result is reported, are not presented on transcripts.
- The June 2023 report cards did not indicate a withdrawal. Instead, they indicated the percentage of the course completed to date and further information regarding how the course will continue in the following year. In conversations on January 10, 2024, the Principal stated that they do not inform the students on their report cards about withdrawals because of how the information might make the students feel.
- Students were generally working in a self-directed manner on courses, not on a subject specific timetabled educational program.
- The majority of non-graduated adult student files indicated courses claimed for the 2023/24 school year were the same as the courses claimed for the 2022/23 school year and in some instances the 2021/22 school year. This practice is contrary to the eligibility requirements for funding in this current school year. As identified in the [Form 1701 Instructions for Independent Schools](#) (P.11) – “*Courses encompass only one organized set of learning standards. While completion of the course’s learning outcomes may be over a number of enrolment periods, only one course is undertaken and therefore eligible for only one funding claim.*” The “continuous” reporting of the same courses is not funding eligible.
- ***Adult Non-Graduate students with Special Needs Funding Eligibility*** states that: *Adult students who have not graduated and have special needs are eligible for special needs funding under certain circumstances. See [Form 1701](#) (K-12 Form Instructions) for category details. Adult students must also have been reported on the Form 1701 in the prior school year (they are continuing their K-12 education program uninterrupted from when they were still school age), are working towards the continuation of those school-age goals set out in their Individual Education Plan (UEP) and **are enrolled in eligible courses** that lead to the BC Certification Graduation or the BC Adult Graduation*

Diploma. In these instances, these student claims were not reported with funding eligible courses.

- **Individual Education Plans:**

- 12 IEPs contained one goal and one to two objectives.
- Five of the school-aged student IEPs were the same as the previous school year.
- Two adult non-graduate student IEPs were revised from the previous school year contrary to the eligibility for adult non-graduates reported with Special Education designations. Per the [Non-Graduated Adult Special Education funding eligibility directives](#): adults must be continuing their K-12 education program uninterrupted from when they were school age and are to be working towards the continuation of those school age goals set out in their IEP. Revising the goals does not meet the eligibility criteria.
- There was inconsistency in listing service providers in the IEPs. There were instances where service providers were not listed on the IEP but in a separate document listing program supports such as therapeutic gardening, therapeutic art, equine therapy, music therapy, occupational therapy.
- Many of the objectives in the IEPs were strategies rather than objectives. Only two of the IEPs for students in Grades 10 to 12 contained transition goals.

- **Service Provision:**

- Evidence of service provision was not readily available in the student files. Schedules, service provider summaries and communication logs were provided upon request.
- While the Special Education Category was not listed, the Parent/Guardian Confirmation Form was available in all student files.
- Four student files claimed in Code H did not have evidence to meet the criteria for the Intensive Behaviour Intervention or Serious Mental Illness category.
 - For one adult non-graduated student claimed in Code H, there was no evidence to indicate that the student was attending at the claim date. There was no evidence of learning activities in accordance with the IEP; IEP goals were not a continuation of those school age goals; there were no records of special education services being provided to the student, and there was no evidence of coordinated across-agency and community integrated case management. The student completed the one course required for graduation from home during August and September 2023. There was evidence that the student was employed full time during September 2023. As there was no evidence the student was attending the School at the required claim date nor of any special education supplemental servicing to meet the criteria for supports/servicing in Code H, student claim has been recommended for declassification from any special education category. The student's graduation status was reported by the School in October 2023.
 - For three school aged students claimed in Code H, there was no evidence the student was attending at the claim date, no evidence of service provision, and no evidence of coordinated across agency and community integrated case management. One student came to an intake meeting on September 6, 2023 and an Individual Education Plan was developed. The student did not attend and transferred to another school in

November 2023. The second student came to an intake meeting on September 13, 2023 but did not attend. The student was withdrawn from the school on December 19, 2023. The third student came to an intake meeting on September 26th but did not attend Artemis Place Secondary School and was withdrawn by the School on December 19, 2023. Without evidence of service provision these claims have been recommended for declassification from any special education category.

Recommendations:

The auditors recommend that:

- The School examine the use of continuous/self-paced progress for all students to ensure alignment with the Ministry directives and to ensure students achieve their graduation requirements in a timely manner.
- The School refrain from reporting funding of courses claimed in a previous year ensuring alignment with P.11 of the Form 1701 Instructions which says: “*Courses encompass only one organized set of learning standards. While completion of the course’s learning outcomes may be over a number of enrolment periods, only one course is undertaken and therefore eligible for only one funding claim*”. The current process of repeatedly reporting the same course over more than one year does not meet the current eligibility directives.
- The School ensure that all special needs claims have a program of courses that meet the funding eligibility requirements before reporting a supplemental claim.
- All adult claims must meet the Adult Non-Graduate Student with Special Needs Funding Eligibility segment of the Adult Non-Graduated Funding Policy including the requirement that the reporting of adult students aligns with the required attendance directive; are working towards the continuation of their school-age goals set out in the IEP and are enrolled in eligible courses leading to a B.C. Graduation program. Revising the goals and not adhering to the [adult attendance definition](#) does not meet the reporting directives for non-graduated adults.
- The School review their current practices of recording student attendance to ensure it is consistent, accurate, and meets the required standards for student attendance and educational programming.
- The School staff list the Special Education Category, as claimed on Form 1701, on all Parent/Guardian Confirmation Forms.
- The School staff ensure that claims for students classified in the Students Requiring Intensive Behaviour Intervention or Students with Serious Mental Illness Category (Code H), are reported only when supported by the appropriate assessments. These assessments must include either a mental health assessment of a serious mental illness conducted by a mental health professional, or a behaviour assessment in accordance the Special Education Services Manual of Policies, Procedures and Guidelines.
- The School report only student claims in each category when there is evidence to verify criteria has been met and that a plan for the delivery of these special education services are in evidence at the time of the required claim.
- The School ensure any students claimed for supplemental special education funding are attending and the School is providing supports and services that address the needs identified in the assessment documentation.

- The School ensure all student claims are verified before reporting to the Ministry's Data Management Branch.
- The School staff be required to undertake a Ministry sanctioned compliance workshop to ensure all related staff are adhering to student enrolment in eligible courses per the Form 1701 Instructions and the Adult Non-Graduated Funding Policy.
- The School staff be required to undertake a Ministry sanctioned workshop specific to writing effective Individual Education Plans that align with Ministry directives including in the Special Education Manual of Policies, Procedures and Guidelines, and the [IEP Order](#).
- The School be considered for a return audit ensuring the recommendations from this audit are adhered to.
- To ensure accurate reporting for Independent School Eligible Student Audits, the attendance tracking and provision of educational programming found during this audit will be reported to the Ministry's Independent School team for their follow up.

Auditors' Comments

The auditors express their appreciation to the school staff for their cooperation and hospitality during the audit.