



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

2023/24 Special Education Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 51 (Boundary)

2023/24 SPECIAL EDUCATION ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 51 (Boundary)

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 2023/24 school year, school boards reported 41,361 students enrolled in the low incidence supplemental special education funding categories at September 2023. School District No. 51 Boundary reported 112 students in the supplemental special education funding categories as of September 29, 2023. For the purpose of this compliance audit, School District No.51 (Boundary) reported one student claim in the Physically Dependent Category (Code A), five student claims in the Moderate to Profound Intellectual Disability Category (Code C), 25 student claims in the Physical Disability or Chronic Health Impairment Category (Code D), one student claim in the Visual Impairment Category (Code E), three student claims in the Deaf or Hard of Hearing Category (Code F), 63 student claims in the Autism Spectrum Disorder Category (Code G), and 14 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 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. 51 (Boundary) during the week of February 5, 2024.

An entry meeting was held on February 5, 2024 with the Superintendent, Secretary-Treasurer and District Principal of Student Support Services. Daily meetings with the District Principal of

Student Support Services were held to present preliminary findings and to seek clarification related to the contents of files.

A sample of one student file reported in the Physically Dependent category (Code A), five student files in Moderate to Profound Intellectual Disabilities (Code C), 25 student files in Physical Disability or Chronic Health Impairment (Code D), one student file in Visual Impairment (Code E), three student files in Deaf or Hard of Hearing (Code F), 63 student files in Autism Spectrum Disorder (Code G), and 14 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.

An exit meeting was held on February 8, 2024 with the Secretary-Treasurer and the District Principal of Student Support Services. 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 2023/24 school year, and expressed appreciation for the assistance provided.

Observations

There were no recommended reclassifications for the student files reviewed in Code A, Code C, Code E, Code F and Code G.

Of the 26 student files reviewed by the auditors in Code D:

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

Of the 14 student files reviewed by the auditors in Code H:

- One student claim was recommended for declassification from any special education category.
- Three student claims were recommended for reclassification to the Students Requiring Behaviour Support or Students with Mental Illness Category (Code R).

(See Appendices for details)

The auditors found that:

- The Individual Education Plan (IEP) meeting notes and the form with the parent's signature acknowledging the opportunity to discuss the IEP were of assistance with verifications. The school-based team meeting notes were also helpful as evidence of student support.
- Most of the IEPs had: a variety of measurable goals; documentation of current ability; and, level strategies appropriate for the category.
- There was evidence of monthly reports from the Teacher of the Deaf and Hard of Hearing.
- There was evidence of a thorough process for changing student categories.
- Many clarifications were required to obtain the evidence required to verify Level Two supplemental claims at the Walker Development Centre.
- Many of the forms and/or notes did not have complete dates.
- There were instances where:

- it was not evident the parent had been consulted on the preparation of the IEP;
 - the Instructional Support Planning Process was not completely filled out with the only comment being: “See IEP”; and
 - there was no evidence of planning coordinated across agency and community (integrated case management or wrap around planning).
- For one student claim in Code D there was no evidence of attendance at the claim date. There was no evidence of a chronic health impairment seriously impacting the student’s education and achievement. There was no IEP dated after September 30, 2022. Without evidence to meet the Special Education Services Manual of Policies, Procedures and Guidelines and the Form 1701 reporting directives, the recommendation was for declassification from any special education category.
 - For one student claim in Code H there was no evidence student was receiving special education services to address the needs identified in the assessment documentation that were beyond those offered to the general school population and proportionate to level of need. There were no integrated case management notes. Upon clarification, the School staff stated, *“The student chooses not to see either of the CYCs in this school. They do not have a good relationship with either one. They see the guidance counsellor and/or career councillor as needed but not on a regular schedule. The diagnosis is more mental health related than behaviour and they have some outbursts from time to time and skip class, but that is the most we see.”* It was verified that the student was enrolled in a support block to complete Foundations of Math 11 and Pre Calc 10. Without evidence to meet the Special Education Services Manual of Policies, Procedures and Guidelines and the Form 1701 reporting directives, the recommendation was for declassification from any special education category.
 - For one student claim in Code H there was no current evidence of planning coordinated across agency and community (integrated case management/wrap around). In 2021 there was evidence of a recommendation to change the designation from Code H to Code R (Students Requiring Behaviour Support or Students with Mental Illness Category). The confirmation for category change was provided by the District Principal. The 2023/24 school year IEP indicated Code R. Given there was evidence of moderate behaviour problems at the time of the claim, the recommendation was for reclassification to Code R.
 - For one student claim in Code H there was no current evidence of planning coordinated across agency and community (integrated case management/wrap around). The last related evidence was in the 2021/22 school year. As there was evidence of moderate behaviour problems at the time of the claim, the recommendation was for reclassification to Code R.
 - For one student claim in Code H there was no evidence of planning coordinated across agency and community (integrated case management/wrap around) at the claim date. The evidence verified involvement of Child and Youth Mental Health in 2021 and of moderate behaviour problems. The Instructional Support Planning Process showed all areas in the mild to moderate range, supporting a recommendation for reclassification to Code R.
 - For one student claim in Code G there was evidence of a recent diagnosis of ASD from Alberta Health Services. While the Kindergarten student was verified as receiving services outlined in the IEP that related to the identified needs; were beyond those offered to the general school population; and, were proportionate to need, the District staff did not have a confirmation of the ASD diagnosis by a qualified B.C. specialist as required for a designation in this category. In accordance with the Special Education Services Manual of Policies, Procedures and Guidelines (p.87) it says: *“For all children and youth with a documented*

diagnosis of ASD from another province in Canada who have moved to British Columbia, a confirmation of diagnosis of ASD by a qualified BC specialist should be accepted, provided the confirmation of diagnosis includes a copy of the original assessment and diagnostic report(s)”. In this instance, the District staff must ensure there is evidence confirming the diagnosis by a qualified B.C. specialist, before reporting a Code G claim in any subsequent claim periods.

- For one student claim in Code F there was evidence verifying the student was minimally meeting the criteria for bi-lateral hearing loss. The Grade 2 student had evidence of a severe language disability and was receiving services. The Teacher of the Deaf and Hard of Hearing stated, *“the student will be assessed annually and once his speech and reading have caught up, he will be removed unless his hearing levels decrease. He is receiving instruction from me on how to compensate/advocate for his hearing needs when he does not hear or it may be difficult to hear.”* Before reporting this student claim in subsequent funding periods, the District staff are to ensure the criteria for Code F claims is met.

Recommendations

The auditors recommend that:

- The District staff ensure all forms and notes to support student designation claims have complete dates (month, day and year).
- The District staff ensure there is clear evidence of parental consultation for all IEPs.
- The District staff ensure the Instructional Support Planning Process when used, is filled out in its entirety and the IEP goals reference the skills identified as growth areas.
- The District staff ensure that all students claimed for funding are enrolled and attending as of the claim date as per the Form 1701 Instructions.
- The District staff ensure that services for students claimed for Level Two supplemental funding and attending the Walker Development Centre (an Alternate Education Program facility) are receiving clearly documented services over and above those offered as part of the student’s Alternate Education Program. These supplemental services must address the needs identified in the assessment documentation that are beyond those offered to the student population at the Alternate Education Program facility and are proportionate to level of need.
- The District staff ensure that all students claimed for current school year supplemental funding have current IEPs in place dated after the previous year’s September claim date as stated in the Form 1701 Instructions.
- The District staff ensure, for all Code D claims, there is documented evidence of a medical diagnosis in one or more of the following areas that seriously impacts students’ education and achievement:
 - nervous system impairment that impacts movement or mobility and/or
 - musculoskeletal condition and/or
 - chronic health impairment.

The student’s functioning and education must be significantly affected by their physical disability. There must be evidence of documented services to address the needs identified in the assessment documentation that are beyond those offered to the general student population and are proportionate to level of need.

- The District staff are to follow the directives of the Special Education Services Manual of Policies, Procedures and Guidelines ensuring any student claimed in Code G meets the

directives including those whose diagnosis was made outside British Columbia, ensuring the diagnosis is confirmed by a BC specialist before a funding claim is made.

- The District staff follow the directives of the Special Education Services Manual of Policies, Procedures and Guidelines ensuring any student claimed in Code F fully meets the criteria before a funding claim is made, including evidence to verify:
 - The student has a medically diagnosed significant bilateral hearing loss, a unilateral loss with significant speech/language delay, or a cochlear impact (typically documented in a report from a health professional such as an audiologist).
 - Assessment information indicates that the student has substantial educational difficulty due to the hearing loss.
- The District ensure that all students claimed in Code H fully meet the criteria as described on Page 59 and 60 of the Special Education Services Manual of Policies, Procedures and Guidelines including: *“evidence of inter-agency or service provider involvement without intensive and collaborative ongoing planning and service co-ordination, is not sufficient in itself to warrant funding in this category”*.

Auditors’ Comments

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