



**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. 69 (Qualicum)

2023/24 SPECIAL EDUCATION ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 69 (Qualicum)

Background

The Ministry of Education and Child Care funds boards of education based on the boards' reported enrolment as of September 29th 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. 69 (Qualicum) reported 314 students in the supplemental special education funding categories as of September 29, 2023. School District No. 69 (Qualicum) reported two student claims in the Physically Dependent Category (Code A), four student claims in the Moderate to Profound Intellectual Disability Category (Code C), 79 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), 116 student claims in the Autism Spectrum Disorder Category (Code G), and 109 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. 69 (Qualicum) during the week of January 22, 2024.

An entry meeting was held on January 22, 2024, with the Superintendent, Assistant Superintendent, and the District Principal Learning Services. Daily meetings with the Assistant Superintendent and the District Principal Learning Services were held to present preliminary findings and to seek clarification related to the contents of files.

A sample of two student files reported in the Physically Dependent category (Code A), two student files in Moderate to Profound Intellectual Disabilities (Code C), 50 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), 25 student files in Autism Spectrum Disorder (Code G), and 52 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.

The file review process encountered nine issues requiring a meeting:

1. There were several student files that did not have evidence in the file meeting the diagnostic criteria for the category in which students were reported.
 - For two student claims reported in Code C there was no psycho-educational assessment of a moderate to profound intellectual disability. The psycho-educational assessments were provided upon request.
 - For five student claims reported in Code D there was no medical assessment of a physical disability or chronic health condition. Medical reports that met criteria for Code D were available for two of the student claims upon request.
 - While one student claim reported in Code D had a physical disability diagnosis, there was no evidence that the student's functioning and education was significantly impacted by the physical disability. There was evidence of an assessment confirming a diagnosis of Autism Spectrum Disorder (Code G).
 - For one student claim the District assigned a provisional placement in Code G without evidence of the required assessment.
2. There were six issues related to Individual Education Plans (IEPs).
 - Many IEPs did not have a specific method of measurement for tracking progress.
 - 22 IEPs had only one goal and one objective and these IEPs did not address the range of needs identified for the students.
 - Many student files did not contain evidence that the student was being offered learning activities in accordance with the IEPs.
 - Several IEPs with curricular competency goals did not indicate if these goals were supplemental or replacement curriculum.
 - For many students in Grades 10 to 12 there were no transition goals in the IEP.
 - The IEPs did not list the special education support services being offered to the student. The services were listed on the District form titled, Supports Checklist–Targeted and Individualized Supports.
3. Many student files did not contain evidence that the student was receiving the special education services listed on the Supports Checklist–Targeted and Individualized Supports. Support timetables and communication logs identifying the required evidence of service provision were provided upon request for many of the files. One student claim for Code E did not contain evidence that a Teacher of the Visually Impaired provided services to the student. An updated report from the Teacher of the Visually Impaired was provided upon request.
4. There were seven student claims reported in Code H where there was no evidence of outside agency integrated case management. The required evidence was provided for four of the students upon request.

5. For eight student claims reported in Code D there was no assessment evidence that confirmed the student's functioning and education was significantly affected by the physical disability or chronic health impairment. The required evidence for seven of the student claims was provided upon request.
6. There were several student files in which evidence documents did not contain a date or name. One student file contained a functional behavioural assessment with no date or name of assessor. Some meeting notes, communication examples, summary of impact statements did not contain the date or the name of the person making the notes.
7. The District utilizes a Request for De-Designation form when a student no longer meets the requirements for reporting in a special education category. While three student files had notes about de-designation in communication logs or on post-it notes, the District de-designation form was not available in the student file nor was there evidence of follow-through with the de-designation process for the Fall 1701 reporting period.
8. For one student reported with a profound unilateral sensorineural hearing loss (Code F) there was no assessment of a significant speech/language delay. A speech language assessment of a moderate speech/language delay was provided upon request.
9. There were five student files that did not contain evidence of the BC residency for the parent/guardian. Evidence of residency was provided for all student files upon request.

An exit meeting was held with the Superintendent, Assistant Superintendent, and the District Principal Learning Services on January 26, 2024. 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 two student files reviewed by the auditors in Codes A, C, E and F.

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

- One student claim was recommended for reclassification to Code G
- One student claim was recommended for reclassification to Code H
- One student claim was recommended for reclassification to Code Q
- One student claim was recommended for declassification from any special education category.

Of the 25 student files reviewed by the auditors in Code G

- One student claim was recommended for reclassification to Code H

Of the 52 student files reviewed by the auditors in Code H

- One student claim was recommended for reclassification to Code Q
- Two student claims were recommended for declassification from any special education category.

(See Appendices for details)

The auditors found that:

- Four student claims reported in Code D for Physical Disability/Chronic Health Impairment were without evidence to meet the diagnostic criteria for Code D as required in the Special Education Services Manual of Policies, Procedures and Guidelines.
 - The evidence for one student claim contained an IEP that noted the student had a diagnosis of a chronic health condition. There was no medical report that provided evidence of the diagnosis.
 - For one student claim there was no evidence of a medical diagnosis that met criteria for Code D. There was a mental health report by a psychiatrist of a diagnosis of a serious mental illness and an Instructional Support Planning Process document that indicated a complex level of impact in four domains. There was also evidence that planning was coordinated across-agency and community and an IEP that met criteria for Code H for Intensive Behaviour or Serious Mental Illness.
 - For one student claim there was no evidence of a medical diagnosis. There was a psycho-education assessment that confirmed a diagnosis of a specific learning disorder in reading, written expression, and mathematics. The diagnostic assessment and IEP met criteria for Code Q for Learning Disability.
 - For one student reported in Code D with Tourette's disorder, there was no evidence of an assessment that confirmed the student's function and education was significantly affected. There was evidence of an assessment that met the criteria for a diagnosis of Autism Spectrum Disorder. It was further verified that the IEP and support services aligned with Code G.
- For one student with Type 1 Diabetes reported in Code D, there was evidence to meet the criteria in the current school year. There was evidence that the student had recently received an insulin pump and was becoming more independent in insulin management. There was a Request for De-designation Form indicating the intent of the District to no longer report the student in Code D in the 2024/25 school year.
- For one student claim reported in Code G there was no evidence of an assessment that met the diagnostic criteria for Autism Spectrum Disorder. A current Instructional Support Planning Tool provided evidence of a behaviour assessment that met the diagnostic criteria for Code H for Intensive Behaviour or Serious Mental Illness. There was also an IEP that was aligned with Code H and evidence of planning that was coordinated, across-agency and community.
- For one student claim reported in Code H there was no evidence of an assessment that met the diagnostic criteria for Intensive Behaviour or Serious Mental Illness. While a psycho-educational assessment noted there was a report from a pediatrician that made a diagnosis of a serious mental illness, there was no evidence of a mental health diagnostic assessment nor evidence of integrated case management. The file contained a psycho-educational assessment that met the diagnostic criteria for Code Q for Learning Disability. There was also an IEP that aligned with Code Q.

- For one student claim in Code H for Intensive Behaviour or Serious Mental Illness there was no evidence that the student was attending at the claim date, nor was there evidence of special education services, or planning that was coordinated across-agency and community.
- For one student claim in Code H for Intensive Behaviour or Serious Mental Illness there was no evidence of an assessment that met the criteria. A recent Instructional Support Planning Process document reported the student as having mild symptoms in all domains. There was no evidence that the planning was coordinated across-agency and community.
- The evidence for one student reported in Code H for Intensive Behaviour or Serious Mental Illness met criteria for the category for the 2023/24 Fall 1701 data submission. There was evidence in the file that the student was becoming less impacted by the mental illness after being placed in the District's Alternate Education Program facility this year. Without evidence of the impact of the mental illness on the student's functioning and education along with evidence that the provision of planning is coordinated across-agency and community, the reporting in a subsequent school year does not meet the eligibility for a Code H claim.

Recommendations

The auditors recommend that:

- The District staff ensure student special education category claims are supported by evidence aligned with the Special Education Services Manual of Policies, Procedures and Guidelines.
- The District staff ensure that student claims in Code D meet the diagnostic criteria listed in the Special Education Services Manual of Policies, Procedures and Guidelines. There must be documentation of a medical diagnosis in one or more of the following areas: a nervous system impairment that impacts movement or mobility, and/or a musculoskeletal condition, and/or a chronic health impairment that seriously impacts the student's education and achievement.
 - The District staff only report students in Code D when there is evidence of the medical diagnosis of a physical disability or chronic health impairment that meets the diagnostic criteria for Code D.
 - For Code D claims, the District staff are to verify there is evidence of assessment information confirming the student's functioning and education is significantly affected by the physical disability or chronic health impairment and/or the student with complex developmental behaviour conditions, including FASD, exhibits an array of complex needs in two or more domains which significantly impact the student's education and achievement.
- Before reporting student special education designations to the Ministry of Education and Child Care, the District staff are to ensure the Special Education Services Manual of Policies, Procedures and Guidelines criteria are met including evidence to verify the claims.
- The District staff refrain from the practice of claiming supplemental funding based on a provisional designation. Only those student claims meeting the diagnostic criteria as outlined in the Special Education Services Manual of Policies, Procedures and Guidelines are to be reported for funding including Code G. The Ministry of Education and Child Care provides supplemental funding to school boards to meet the diverse needs of students within their district. Although supplemental funding is generated based on student designations, it is not

targeted to specific students and is to be used by the school board's schools to meet the needs of all students across the District as identified in the [K-12 Special Needs Funding Policy](#).

- The District staff ensure that students claimed in Code H fully meet the criteria as stated in Section E.5 of the Special Education Manual of Policies, Procedures and Guidelines. There is to be evidence to support that the student has been appropriately assessed; there is evidence that indicates either antisocial, extremely disruptive behaviour over time or severe mental illness; and evidence that planning is coordinated across agency and community.
- The District staff ensure that student claims in Code H meet the required diagnostic criteria including the following evidence:
 - A behaviour assessment of antisocial, extremely disruptive behaviour in most other environments and consistently/persistently over time; and/or a mental health assessment by a qualified mental health professional that indicates evidence of a severe mental illness.
 - The behaviour places the student or others at serious risk and/or interferes with his or her academic progress and that of other students.
- The District staff ensure that Form 1701 reporting is verified prior to submission and that the evidence in the student files are updated and reviewed regularly to ensure the students meet the criteria in the category in which they are claimed for the reported school year.
- The District staff ensure there is an annual review process in place for verifying that students reported in Code H for Intensive Behaviour or Serious Mental Illness continue to meet all the criteria for reporting in Code H in the subsequent school year.
- The District staff ensure that consistent processes are in place for declassifying students when they no longer meet category placement.
- The District staff ensure that all IEPs are in accordance with the Special Education Services Guidelines, the IEP Legislation, and the Form 1701 instructions, including:
 - Clear and measurable goals and objectives in alignment with the category in which the student is identified.
 - Strategies and objectives that are clearly distinguishable as two separate elements of the IEP.
 - Methods for measuring student progress in relation to the IEP goals (goals must be measurable).
- To ensure all the requirements of an IEP are met, the District staff be required to undertake a Ministry sanctioned compliance workshop on writing Competency Based IEPs and to enhance staff understanding of the Ministry of Education and Child Care directives regarding the special education criteria.
- The District be considered for a return audit to ensure the findings of the audit are put into practice.

Auditors' Comments

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

**Funding and Financial Accountability Branch
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Ministry of Education and Child Care
February 12, 2024**
