



**Ministry of Education
Resource Management Division**

2019/20 Special Education Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 5 (Southeast Kootenay)

2019/20 SPECIAL EDUCATION ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 5 (Southeast Kootenay)

Background

The Ministry of Education 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 2019/20 school year, school boards reported 31,798 students enrolled in the low incidence supplemental special education funding categories at September 2019. School District No. 5 (Southeast Kootenay) reported 490 students in the supplemental special education funding categories as of September 30, 2019. For the purpose of this compliance audit, School District No. 5 (Southeast Kootenay) reported 18 student claims in the Physically Dependent Category (Code A), 29 student claims in the Moderate to Profound Intellectual Disability Category (Code C), 53 student claims in the Physical Disability or Chronic Health Impairment Category (Code D), four student claims in the Visual Impairment Category (Code E), 19 student claims in the Deaf or Hard of Hearing Category (Code F), 175 student claims in the Autism Spectrum Disorder Category (Code G), and 192 student claims in the Intensive Behavior Intervention/Serious Mental Illness Category (Code H).

The Ministry of Education 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. 5 (SE Kootenay) during the week of February 18, 2020.

An entry meeting was held on February 18, 2020 with the Superintendent, Secretary Treasurer, Director of Student Learning and Innovation, District Principal Student Services, Student Services Coordinator and two Executive Assistants. Daily meetings with the District Principal

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

The sample consisted of 18 student files reported in the Physically Dependent category (Code A), 15 student files in the Moderate to Profound Intellectual Disability category (Code C), 53 student files in the Physical Disability or Chronic Health Impairment category (Code D), four student files in the Visually Impaired category (Code E), ten student files in the Deaf or Hard of Hearing category (Code F), 40 student files in Autism Spectrum Disorder category (Code G), and 100 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 an issue regarding several students claimed in Code A with diagnoses of Autism Spectrum Disorder and Global Developmental Delay. Although these students required a great deal of support, the evidence in the files did not support that students were completely dependent on others for meeting all five daily living needs, nor that they required assistance at all times for mobility. It was determined a visit to the schools was not required as there was sufficient evidence in the student files to confirm the students did not meet the criteria for a Physically Dependent claim in Code A.

An exit meeting was held with the Superintendent, Secretary Treasurer, Director of Student Learning and Innovation, District Principal Student Services, Student Services Coordinator and two Executive Assistants on February 21, 2020. 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 2019/20 school year, and expressed appreciation for the assistance provided.

Observations

Of the 18 student files reviewed by the auditors in Code A

- five student claims were recommended for reclassification to Code G or C
- one student claim was recommended for reclassification to Code D

Of the 53 student files reviewed by the auditors in Code D:

- one student claim was recommended for reclassification to Code H
- one student claim was recommended for reclassification to the Learning Disabilities category (Code Q)

Of the 100 student files reviewed by the auditors in Code H:

- two student claims were recommended for reclassification to the Moderate Behaviour Support/Mental Illness category (Code R)

There were no recommended reclassifications for the student files reviewed by the auditors in Code C, Code E, Code F, or Code G.

The auditors found that:

- Six student claims did not have evidence to meet criteria for placement in the Physically Dependent Category (Code A). Evidence verified these students had been previously claimed in Code G or Code C. There was no evidence to indicate there had been any change to the initial diagnoses or the level of support required and provided. The evidence verified the students did not require assistance at all times for all major daily living needs in accordance with the Special Education Manual of Policies, Procedures and Guidelines.
 - five students had multi-disciplinary assessments by Interior Health Children's Assessment Network (IHCAN) or BC Autism Assessment Network (BCAAN) and met the criteria for Autism Spectrum Disorder (Code G) or Global Developmental Delay (Code C).
 - one student was diagnosed with Down Syndrome and met the criteria for Physical Disability/Chronic Health Impairment (Code D).
- Two student claims in Code D did not have evidence to meet the criteria for the Physical Disability/Chronic Health Impairment category.
 - One student claim had no evidence of a medical diagnosis to support placement in this category. There was a letter from a physician which did not verify a medical diagnosis. There was evidence in the student file to support a claim in Code H.
 - One student claim had a diagnosis of Childhood Apraxia of Speech (CAS). This diagnosis meets the criteria for Learning Disabilities (Code Q) in accordance with the Special Education Manual of Policies, Procedures and Guidelines.
- Two student claims for Code H did not have evidence to meet the criteria for placement in the Intensive Behaviour Interventions/Serious Mental Illness Category. These two students did not have current evidence of antisocial, extremely disruptive behaviour or serious mental illness. Both students were verified to meet criteria aligned with Requiring Behaviour Support or with Mental Illness (Code R).
- The diagnostic information was relative to each category claim and contained current, pertinent and dated evidence to support the criteria in each category.
- Instructional planning tools were a helpful support in the placement and planning for some students.
- The IEPs were current and comprehensive with the diagnostic information thoroughly summarized on the IEP.
- The IEP used consistently throughout the District contained competency based language with all the required components of an IEP met.
- There were Transition goals (where appropriate) evidenced throughout the IEPs in the sample.
- The IEPs for students in all categories were consistently written to reflect the needs of individual students. The goals and strategies often reflected recommendations from various assessments or medical reports.
- Code H student files contained a considerable amount of evidence to support the additional services provided to students. Outside agency support and collaboration was well documented.
- There was evidence in all the student files of on-going reviews as a measure to align the criteria for placement in the category students were claimed.
- There were a number of forms developed by the District that contained information assisting the verification process. These included: Designation Form, Supplemental Plans for

Category A, Continuum of Services and Programs–Behavior Interventions, Record of Communication and Year End Review of IEP. In most instances, many of the forms were found to be utilized consistently throughout the District.

- All the student claims reviewed in Code G contained evidence of well-defined services and programs.

Recommendations:

The auditors recommend that:

- The District's support services staff ensure student claims in the Physically Dependent category (Code A) contain assessment documentation verifying the student is completely dependent on others for meeting all major daily living needs and that the student requires assistance at all times for feeding, dressing, toileting, mobility and personal hygiene, as outlined in the Special Education Manual of Policies, Procedures and Guidelines.
- The District's support services staff ensure student claims in Code D meet the criteria listed in the Special Education Manual of Policies, Procedures and Guidelines for that category.
 - There must be evidence of a medical diagnosis in one or more of the following areas: nervous system impairment that impacts movement/mobility, musculoskeletal condition; and/or, chronic health impairment that seriously impacts student's education and achievement.
 - There must be evidence that functioning and education is significantly affected by the physical disability or chronic health impairment.
 - There must be evidence indicating the special education services the student is receiving to address the needs identified.
- The District's support services staff ensure student claims in Code H have evidence that meets the criteria listed in the Special Education Manual of Policies, Procedures and Guidelines.
 - For students with a serious mental illness, there must be evidence of a mental health assessment made by a mental health professional.
 - For students needing intensive behaviour support, there must be evidence of a behavioural assessment indicating antisocial, extremely disruptive behaviour in most other environments and consistently over time.
 - There must be evidence that the planning is coordinated, across-agency and community using integrated case management.
- The District report only student claims in each category when there is evidence to verify the Special Education Manual of Policies, Procedures and Guidelines requirements have been met.
- The District support services staff ensure student files are updated and reviewed regularly to ensure appropriate service provision and alignment with the category criteria in which students are claimed for the reported school year.

Auditors' Comments

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