For each section of the TCDSB Special Education Plan we have commented with 3 sections:

- 1. "Required" refers to what is required by the ministry guidelines.
- 2. "Findings" are what the working group observed in the TCDSB Spec Education Plan currently on the website.
- 3. "Recommendations" are what we think needs to change in the TCDSB plan, and in some areas, our suggested changes.

1. Board Consultation Process

- a. Required by the Ministry Guidelines
 - i. describe the consultation process
 - ii. a statement of how, in accordance with Regulation 464/97 made under the Education Act, the board ensures that its SEAC is involved in the annual review of the board's special education plan
 - iii. a description of any majority or minority reports concerning the board's approved plan that have been received from members of the board's SEAC
 - iv. the board's response to these reports
 - v. a statement of how members of the community, particularly parents of children who are receiving special education programs and services, are informed of the timelines and methods for providing input into the board's special education plan
 - vi. a summary of feedback received as a result of consultation with members of the community
 - vii. results of any internal or external reviews of existing special education programs and services within the board that have taken place in the previous or current school year.
 - viii. list of internal and external reviews of the board's special education programs and services that are planned for the following year.

b. Findings

- i. Many of the sections required by the guidelines for the consultation process are present. They are often difficult to identify as there are no headers explaining the section.
- ii. The "describe the consultation process" is present.
- iii. There is no specific statement that refers to Regulation 464/97 as required. There is a statement that the board ensures that SEAC is involved in the annual review of the board's special education plan. There is a description of SEAC's review process. There is no header for this section.
- iv. The "description of any majority or minority reports concerning the board's approved plan that have been received from members of the board's SEAC", how they are dealt with and their inclusion in the submission to the ministry is missing.
- v. The section on "the board's response to these reports" (majority/minority reports) is missing.
- vi. There is a general "statement of how members of the community, particularly parents of children who are receiving special education

- programs and services, are informed of the timelines and methods for providing input into the board's special education plan". Information specifying the process for parents to receive information and provide input is missing. There is no header for this section.
- vii. "Summary of feedback received" is missing as is any indication that any feedback was received.
- viii. "Results of any internal or external reviews of existing special education programs and services within the board that have taken place in the previous or current school year" is missing. There is no clear section allocated to this requirement.
 - ix. There is no section that "lists internal and external reviews of the board's special education programs and services that are planned for the following year".

c. Recommendations

- i. Add headers for every required sub-section so it is easy to understand. For example, add a header to "describe the consultation process" with a brief description of the process. Add bullet points to list each method of consultation.
- ii. Add a reference to Regulation 464/97. State that it requires a review of the Special Ed plan by SEAC annually. Keep the description of SEAC's review process. Add a header for this section.
- iii. Add a section describing how SEAC reviews the Special Education Plan over 12 months and reports its recommendations for changes and improvements throughout a one-year cycle.
- iv. Add a section describing how the board responds to SEAC's recommendations.
- v. Add a section on majority and minority reports from SEAC, how they are reviewed at the board and how they are included with the Spec Ed plan submission to the ministry. For example, all submissions from the 2020-2021 working group reviewing the Special Education Plan to SEAC should be included here. If no reports were received, this section should indicate as such rather than be left blank or removed.
- vi. Add a section with a header on "the board's response to majority and minority reports". Place staff's response in this section (including staff response to the reports from the 2020-2021 working group reviewing the Special Education Plan).
- vii. Add a brief header for the "statement of how members of the community, particularly parents of children who are receiving special education programs and services, are informed of the timelines and methods for providing input into the board's special education plan". Detail specific opportunities along with general feedback.
- viii. Provide a summary of feedback received and add an appropriate header. If none was received, indicate this in the report. If received from multiple

- types of sources (i.e. CPIC, Parent Survey, SEAC), create a subsection for each type of source and place the feedback in the appropriate subsection.
- ix. Create a section with header for the "results of any internal or external reviews of existing special education programs and services that have taken place." Although only the current and previous school years are required, we recommend adding results from the previous 3, 4 or 5 years. If no reviews were done in a given school year, indicate this in the report.
- x. Create a section listing any "internal and external reviews of the board's special education programs and services that are planned for the following year". Add a header for that section. If there are no plans for review, indicate this in the report.

2. Early Identification Procedures and Intervention Strategies

- a. Required by the Ministry Guidelines
 - i. The statement "these procedures are a part of a continuous assessment and program planning process which should be initiated when a child is first enrolled in school or no later than the beginning of a program of studies immediately following Kindergarten and should continue throughout a child's school life" (Policy/Program Memorandum No. 11) must be included
 - ii. the guiding principles or philosophy used by the board for early identification of children's learning needs
 - iii. the teacher's role in early identification
 - iv. the parent's role in early identification
 - v. policies and procedures on screening, assessment, referral, identification, and program planning for students who may be in need of special education programs and services
 - vi. procedures for providing parents with notice that their child is having difficulty
 - vii. procedures used within the board for referring a student for an assessment (e.g. an assessment by an in-school team or by professional resource staff) should learning problems be identified that might result in the student's being referred eventually to an Identification, Placement, and Review Committee (IPRC) (these procedures include notifying parents and involving them in the process)
 - viii. procedures for providing parents with notice that their child is being considered for referral to an IPRC
 - ix. procedures for providing parents with notice that their child is being considered for a special education program and related services if the child is not referred to an IPRC
 - x. the types of assessment tools/strategies used to gather appropriate information on students in order to assist in the development of appropriate educational programs

xi. the types of early intervention strategies that are used to support students prior to referral to an IRPC

b. Findings

- i. The first and second paragraphs do not fully meet the required statement (see 1.a.i. above) and required principles and philosophy;
- ii. Documents dated 2009 and 2010 are referenced, are these the most recent?
- iii. This section relies heavily on the chart of the procedural model; this chart is very crowded and the font is small, the process flow is difficult to understand and complex making it uninviting, not suitable for newcomers to the Board, and hard to read;
- iv. The requirements include policies, procedures and types of tools and assessments, some of which are stated in the procedural model chart, but they are not described;
- v. There is no description of "the teacher's role in early identification" or "the parent's role in early identification";
- vi. Procedures for providing the various notices to parents are not present in the section;
- vii. There is no description of the "types of assessment tools/strategies used to gather appropriate information on students in order to assist in the development of appropriate educational programs";
- viii. There is no description of the "types of early intervention strategies that are used to support students prior to referral to an IRPC";
- ix. Acronyms are used frequently. They need to be spelled out in full in a list of commonly used acronyms, or spelled out in full the first time they are used in each section.
- x. The last two pages of this section contain descriptions of the "early intervention initiatives that are currently underway in the TCDSB". The font size needs to be increased to 12. Is Full Day Kindergarten considered to be an early intervention initiative?
- xi. The Kindergarten Intervention and Needs Development Program (K.I.N.D.) section contains a bolded and capitalized sentence describing acceptance criteria.
- xii. "Transportation is provided from home to centre" is confusing.
- xiii. In the Autism Programs Services paragraph "TCDSB is also participating in a ministry demonstration project Connections for Students." Is this still accurate?
- xiv. Social-Emotional Needs Programs: all of these programs have similar goals.

c. Recommendations

i. Update the reference to the <u>Learning for All, JK to 12</u> document to 2013 version.

- ii. Update the required statement to "these procedures are a part of a continuous assessment and program planning process which should be initiated when a child is first enrolled in school or no later than the beginning of a program of studies immediately following Kindergarten and should continue throughout a child's school life".
- iii. Create a clear "guiding principles or philosophy" statement that defines the board's approach to early identification of children's learning needs
- iv. Create clear description of "the teacher's role in early identification"
- v. Simplify the policies and procedures on screening, assessment, referral, identification, and program planning for students who may need special education programs. Put under clear headings and if you keep the procedural chart simplify it and expand it to more than one page.
- vi. Create a section setting out the "procedures for providing parents with notice that their child is having difficulty" with an explanation and an appropriate heading.
- vii. Create section for notifications outlining the "procedures used within the board for referring a student for an assessment". Any notice of assessment should indicate there will be a meeting to review the results, it could lead to an IPRC, placement in an ISP class, the parent's rights regarding assessments including they can source an assessment privately and if the assessment will become part of the Ontario Student Record (OSR).
- viii. Create section that outlines the "procedures for providing parents with notice that their child is being considered for referral to an IPRC" with an appropriate header.
- ix. Create a section that outlines the "procedures for providing parents with notice that their child is being considered for a special education program and related services if the child is not referred to an IPRC", with an appropriate header.
- x. Create a list of the "types of assessment tools/strategies used to gather appropriate information on students in order to assist in the development of appropriate educational programs" with the appropriate header and some details as to the purpose of the assessment.
- xi. Create a list of the "types of early intervention strategies that are used to support students prior to referral to an IRPC". Include a brief description on each strategy and an appropriate heading.
- xii. Summary of the Early Intervention section. This section was very difficult to follow. Some of the information expected from the guideline is here but it is not presented in a cohesive manner and does not follow the guidelines in terms of points to be covered in a logical manner. It is recommended that it be rewritten following the points required by the guideline with additional information added to the specific points where appropriate.
- xiii. Re xi in the Findings above: remove bolding and capitalization to maintain neutrality.

- xiv. Re xii in the Findings above: If this is a full-time withdrawal program it should be explained earlier in the section.
- xv. Re xiv in the Findings above: the five programs could simply be listed following an introductory paragraph.

3. Specialized Health Support Services in School Settings .

- a. Required by the Ministry Guidelines
 - i. Describe the provision of specialized health support services for students who require them in school settings
 - ii. Outline specific information about each type of specialized health support service provided by
 - 1. Local Health Integration Networks (LHIN)
 - 2. School board staff
 - 3. Other service providers
 - 4. Use the chart in Appendix B-1 for the layout.
 - iii. For each type of specialized health support service described, the plan must describe the following:
 - 1. The agency or the position of the person who performs the service (e.g., LHIN, board staff, parent, student)
 - 2. Eligibility criteria for students to receive the service
 - 3. Position of the person who determines whether a student is eligible to receive the service and what the level of support will be
 - 4. Criteria for determining when the service is no longer required
 - 5. Review or appeal procedures (if any) available for parents who dispute the provision of these services
 - 6. Time limits on requesting reviews or appeals when available

b. Findings

- i. There is a description but it describes PPM 81, not "the provision of specialized health support services for students who require them in school settings" with a link to PPM 81.
 - 1. There is no outline with specific information about each type of specialized health support service provided by local Health Integration Networks (LHIN), school board staff, and other service providers in this section.
- ii. There is no chart similar to Appendix B-1
- iii. The points below are all part of Appendix B-1. The chart does not exist.
 - 1. The agency or the position of the person who performs the service (e.g., LHIN, board staff, parent, student)
 - 2. Eligibility criteria for students to receive the service
 - 3. Position of the person who determines whether a student is eligible to receive the service and what the level of support will be
 - 4. Criteria for determining when the service is no longer required
 - 5. Review or appeal procedures (if any) available for parents who dispute the provision of these services

6. Time limits on requesting reviews or appeals

c. Recommendations

- i. Describe the provision of specialized health support services for students who require them in school settings specific to this school board.
- ii. Create and complete the required chart shown in Appendix B-1.
- iii. Ensure the chart includes the following columns for each specialized Health support service listed in the chart on Appendix B-1:
 - 1. The agency or the position of the person who performs the service (e.g., LHIN, board staff, parent, student)
 - 2. Eligibility criteria for students to receive the service
 - 3. Position of the person who determines whether a student is eligible to receive the service and what the level of support will be
 - 4. Criteria for determining when the service is no longer required
 - 5. Review or appeal procedures (if any) available for parents who dispute the provision of these services
 - 6. Time limits on requesting reviews or appeals

4. Parent Guide to Special Education

- a. Required by the Ministry Guidelines
 - i. It is not required by the Ministry Guidelines to be part of the board's Special Education Plan but it is required under Reg. 181/98 and is part of the Board's "Roles and Responsibilities" outlined in Section A and referred to in Section B.
 - ii. The Ministry provides a sample of the "Parents' Guide to Special Education" in appendix D-1 pages D32 to D43 of the Ministry's Special Education in Ontario, Kindergarten to Grade 12. Much of the TCDSB "Parent Guide to Special Education" could and should be copied from the sample guide without needing to make any changes. Board specific information can be copied from the Special Education Plan without changes.
 - 1. District School Board Name
 - 2. Mission Statement of the Board
 - 3. Philosophy of the Board
 - 4. What is an IPRC?
 - 5. What is the role of the IPRC?
 - 6. Who is identified as an exceptional pupil?
 - 7. What is a special education program?
 - 8. What are special education services?
 - 9. What is an IEP?
 - 10. How is an IPRC meeting requested?
 - 11. May parents attend the IPRC meeting?
 - 12. Who else may attend an IPRC meeting?
 - 13. Who may request that they attend?
 - 14. What information will parents receive about the IPRC meeting?

- 15. What if parents are unable to make the scheduled meeting?
- 16. What happens at an IPRC meeting?
- 17. What will the IPRC consider in making its placement decision?
- 18. What will the IPRC's written statement of decision include?
- 19. What happens after the IPRC has made its decision?
- 20. Once a child has been placed in a special education program, can the placement be reviewed?
- 21. What does a review IPRC consider and decide?
- 22. What can parents do if they disagree with the IPRC decision?
- 23. How do I appeal an IPRC decision?
- 24. What happens in the appeal process?
- 25. What special education programs and services are provided by the board?
- 26. What organizations are available to assist parents?
- 27. What are the ministry's Provincial and Demonstration Schools?
- 28. English-language Demonstration Schools for students with severe learning disabilities
- 29. Provincial School for the blind and deafblind
- 30. Where can parents obtain additional information?

b. Findings

Bold items are important to address and represent significant variances from the Ministry sample "Parents' Guide to Special Education.

- 1. District School Board Name is there.
- 2. Mission Statement of the Board is there.
- 3. We have a Catholic Values statement.
- 4. There is a screen shot of the front page of the 2016-2021 MYSP
- 5. There are links to
 - a. Living out catholic values
 - b. Fostering student achievement and well being
 - c. Inspiring and motivating employees
 - d. Providing stewardship of resources
 - e. Enhancing public confidence
 - f. Achieving excellence in governance.
- 6. Philosophy of the Board statement is there. It appears to be the one used in the Model for Special Education document.
- 7. The purpose of the guide is included.
- 8. What is an IPRC? It is there it is out of order form the Ministry Sample guide. The content does not match the sample guide. It does not reference the legislation that governs IPRCs (reg 181/98) The content is the content is from the "What is the role of the IPRC?" of the sample guide.
- 9. What is the role of the IPRC? This section does not exist.
- 10. Who is identified as an exceptional pupil? Is there. The header question was changed. The words "identified as" was deleted.

- 11. What is a special education program? This section exists and matches the guide.
- 12. What are special education services? This section exists and matches the guide.
- 13. What is an IEP? This section exists and does not match the guide. Additional information is included in the opening statement. Strengths and weakness point has been removed. The transition point was altered. There is a statement about distribution of the parent guide that is not in the ministry sample. The creation and distribution of the IEP has removed the Principal's obligations to distribute section.
- 14. There is a section on "what assessments are carried out" in our guide that is not in the sample guide.
- 15. How is an IPRC meeting requested? This section exists. The order of the bullet points was altered putting the parental request after the Principal's authority to initiate the process.
- 16. "May parents attend the IPRC meeting?", "Who else may attend an IPRC meeting?" and "Who may request that they attend?" appear to have bee been combined into "Who attends the IPRC meeting". The reference to reg 181/98 is missing. The points in the sample guide stating parents can participate all committee discussions and the parents being present when the decision is made is not there. The sample guide allows outside professionals to participate and our guide omits this. The terminology for a parent representative does not match the sample guide. The sample guide does not allow for a "Principal's designate" to attend.
- 17. "What information will parents receive about the IPRC meeting?" and "What if parents are unable to make the scheduled meeting?" have been combined under "What information will parents receive about the IPRC meeting?" The wording from the sample guide has been changed of concern is the wording in the second bullet point to the end does not match the sample guide.
- 18. What happens at an IPRC meeting? There section exists but the wording has changed from the sample guide. The reference to the assessment being reviewed was altered with the "subject to the Health Care Consent Act" was removed. Other points were edited around interviewing the student and information submitted by the parents or student including recommendations for programs and services. There is a statement at the end about forwarding the decision that belongs in the "What if parents are unable to make the scheduled meeting?".

- 19. What will the IPRC consider in making its placement decision? The section exists. The wording and formatting of the last paragraph changes slightly from the sample guide.
- 20. What will the IPRC's written statement of decision include? Section exists. The wording and formatting changes slightly from the sample guide.
- 21. What happens after the IPRC has made its decision? Section exists. The wording has changed slightly from the guide.
- 22. "Once a child has been placed in a special education program, can the placement be reviewed?" and "What does a review IPRC consider and decide?" under "How is a Special Education Placement Reviewed?" have been combined, the bullet point order and wording changed from the sample guide.
- 23. What can parents do if they disagree with the IPRC decision? Section exists. It follows the sample guide except does not include the director of the board name and address information needed for parents to send an appeal to the appropriate place/person.
- 24. "How do I appeal an IPRC decision?" and "What happens in the appeal process?" have been combined under "The Appeals Process". There is a paragraph in the sample guide at the start of the "How do I appeal" section that is not in our guide. It includes timelines for appeals. There are other small changes in wording.
- 25. What special education programs and services are provided by the board? This exists. The last sentence about placement in the home school was stated earlier too.
- 26. What organizations are available to assist parents? The section exists.
- 27. What are the ministry's Provincial and Demonstration Schools? This section exists.
- 28. English-language Demonstration Schools for students with severe learning disabilities. This section exists.
- 29. Provincial School for the blind and deafblind. This section exists.
- 30. Where can parents obtain additional information? This is combined with "what organizations are available to assist parents" under "Organizations to Assist Parents".
- 31. The "Overview of the Special Education Process" section is not in the sample guide.
- 32. The Ontario Ministry of Education "Category of Exceptionalities" is not in the sample guide.
- 33. The "Summary of Parental Involvement" section is not in the sample guide. There is some duplication from prior sections.

c. Recommendations

Bold items are important to address and represent significant variances from the Ministry sample "Parents' Guide to Special Education.

- 1. The overall recommendation is much of this guide can be copied directly from the "Sample Parents' Guide to Special Education." Often wording was changed unnecessarily and at times those changes diminish the information provided compared to the Sample Parents' Guide.
- 2. State the board's philosophical approach to special education it should align with the board's Mission, vision statements and the philosophy espoused in the Model for Special Education section.
- 3. Create a simple purpose of the document statement.
- 4. What is the role of the IPRC? Add this section and use the sample guide wording.
- 5. What is an IEP? Replace our wording with the sample guide wording.
- 6. Delete the section on "what assessments are carried out" in our guide. Assessments are addressed in a different manner in the sample guide.
- 7. May parents attend the IPRC meeting? Who else may attend an IPRC meeting? Who may request that they attend? Separate these sections use the wording in the sample guide.
- **8.** What information will parents receive about the IPRC meeting? **Use the wording in the sample guide.**
- 9. What happens at an IPRC meeting? Use the wording in the sample guide.
- 10. "Once a child has been placed in a special education program, can the placement be reviewed?" and "What does a review IPRC consider and decide?" Separate the sections and use the wording in the sample guide.
- 11. What can parents do if they disagree with the IPRC decision? Add the director of the board information and address so parents may send an appeal to the appropriate place/person.
- 12. "How do I appeal an IPRC decision?" and "What happens in the appeal process?" Separate the sections and use the wording in the sample guide. To make it easier for parents to send appeals, add the director of the board information and address.
- 13. What special education programs and services are provided by the board? Remove the duplicate sentence.
- 14. What organizations are available to assist parents? Ensure it is up to date. Make sure we note which are agencies vs. parent organizations. The last paragraph starts with "Representatives nominated by these..." add the word "Parent" to the start.