

CONFIDENTIAL

**Toronto Catholic District School Board
Special Education Audit Summary**

June 2015

**Regional Internal Audit Team
Toronto and Area**

**Serving:
Toronto Catholic District School Board**

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EXECUTIVE SUMMARY

Introduction

Special Education was identified as one of the engagements for FY2014-15 as part of the Regional Internal Audit Team (RIAT) 2013–2016 multi-year internal audit plan. The overall objectives of this engagement were to evaluate the effectiveness and efficiency of the delivery of special education programs and services in key areas including management roles and responsibilities, administrative controls, monitoring and reporting processes, and the use of information technology.

With the increased demand for special education programs and services across the province, including at the Toronto Catholic District School Board (TCDSB) along with limited resources and funding available, it is important that special education is managed effectively and efficiently. In addition, equitable allocation of resources is also an important consideration when evaluating special education to ensure that student needs are being met with available resources.

The scope of this engagement does not include the overall funding approach by the Ministry of Education for special education for the TCDSB.

Scope

There are many components to Special Education. A “top down” approach was used to conduct the engagement with a focus on key areas from an operational and program delivery perspective. Through consideration of potential risks and discussions with TCDSB management and the audit committee, the following areas were identified in scope:

- Oversight and Governance –reporting and control structures, roles and responsibilities, committees, and risk assessments;
- Resource Allocation – budgeting and planning and related allocation of staff resources;
- Service Delivery – individual education plans (IEP’s), measuring student progress, wait lists for assessments, and providing programs and services based on student needs and demand and,
- Information Systems and Management –processes and systems to capture, monitor and report on key information and student performance.

All other areas were excluded from our scope, including for example, the special equipment amount (SEA) claims process, Section 23 programs for high risk students whose educational needs are met outside of the regular school system, curriculum delivery and partnerships with external agencies.

Summary of Key Observations and Recommendations

Overall, based on the results of our audit, it was noted that Special Services at the TCDSB provides support to their students with special education needs. Special Services maintains a strong student focus through a number of processes, both formal and informal, including key activities and through oversight committees. This allows management to minimize potential service delivery risks by placing the emphasis on meeting the needs of students within the resources available to them.

However, in order to better address operational and student service delivery risks, we noted opportunities for improvement as follows:

1. Greater effort to understand and address special education spending in excess of ministry funding allocations.
2. Finance should support greater insight of Special Services needs to inform the Board's overall budget and planning process.
3. Management should consider a formal risk assessment process to address operational level and financial risks.
4. Improvements to the support staff allocation model including specifically Educational Assistants (EAs) in order to ensure allocations are based on current student needs.
5. The need for enhanced information systems and reporting, especially in the areas of case management and school-level reporting.
6. Processes for monitoring psychological assessment backlogs can be improved to more effectively address waitlist times.

Management Response:

Management agrees with the above observations and has developed action plans to address these observations as detailed further in each section following.

BACKGROUND

School boards in Ontario are regulated by the Education Act to provide special education programming for all students identified with an exceptionality (see Appendix F for exceptionalities and special education placements). Additionally, there are a large portion of students not formally identified as exceptional but who are receiving special education programs and services.

The Ministry of Education provides funding for the delivery of Special Education programs and services. Every school board in Ontario is required to provide an annual report to the Ministry on the utilization of funding and the number of students supported by Special Education programs and services through their Special Education Plan.

Funding

The Special Education Grant (“SEG”) represents approximately 12% of total Ministry of Education funding to the TCDSB and is the second largest grant behind the Pupil Foundation Grant. SEG funding is comprised of six components, largely driven by enrolment or the “special education per pupil amount” (“SEPPA”) and the number of students at the board with very high needs – the high needs amount (“HNA”).

Ministry of Education Funding - TCDSB								
	FY2011-12	%of	FY2012-13	%of	FY2013-14	%of	FY2014-15	%of
Grants	Actuals	Total	Actuals	Total	Actuals	Total	Projections	Total
Pupil Foundation Grant	451	46%	449	47%	439	46%	484	47%
School Foundation Grant	61.6	6%	61.5	6%	61.1	6%	63.8	6%
Special Education Grant	119.1	12%	118.3	12%	118.0	12%	126.2	12%
Other Grants and Funding Amounts	345.2	35%	335.2	35%	332.0	35%	345.8	34%
Total Funding Excluding Capital Programs	976.7		964.2		949.8		1019.8	

Source: Ministry of Education School Board Funding Projections for 2014-15 (Spring 2014)

TCDSB Special Services

The TCDSB Special Services group, under leadership of Frank Piddisi (“Superintendent of Special Services”, or “Superintendent”) is responsible for a range of services including special education programs, autism, social work, speech and language, and psychology. (refer to Appendix C for the organizational chart). Many of these areas are connected and together support the needs of students with special education needs. The focus of our engagement was on management and oversight at the Board level for special education programs and services provided by Special Education Teachers (“SET’s”), Intensive Support Program Teachers (“ISP’s”), Educational Assistants (“EA’s”) and other support staff. See Appendix D for budget and staffing information for the Special Services group.

OVERALL OBSERVATIONS AND RECOMMENDATIONS

A. Oversight and Governance

As mandated by the Education Act (s. 57.1), every school board is required to establish a Special Education Advisory Committee (SEAC). The SEAC is one of the key oversight mechanisms in place at the TCDSB, along with establishment of the Accountability Framework for Special Education (AFSE) – discussed in Section C – Service Delivery section below.

The Special Services group at the TCDSB is structured into 4 regions and 8 areas. A Principal-level Program Coordinator is responsible for overseeing the schools in their region. These Program Coordinators meet with the Superintendent twice a month and regularly as required to provide updates for their region on special education matters, including discussing all topics relating to special education programs, best practices, and training initiatives.

Based on our discussions with the Superintendent of Special Services, the Program Coordinators spend approximately half of their time in Identification and Placement Review Committee (IPRC) meetings and are therefore familiar with the identified students in their schools and related placement decisions. A large part of the Program Coordinators role is to manage relationships with the school principals, various support staff, students and parents.

Many of the day to day operational issues (i.e. processing SEA applications, participating in school based support learning teams (SBSLT) for classroom assessments etc.) are carried out by the Assessment and Programming teachers (APT's) at the elementary level and Programming and Assessment Teachers (PAT's) at the secondary level. However, from an operational perspective, it is the school principal that has the primary responsibility for ensuring that service delivery and student needs are met (i.e. IPRC meetings and IEP's are in compliance with provincial requirements, special education staff at the school are allocated appropriately, delivery of programming as per the IEP's, as well as holding consultations with board staff and parents as required – see Appendix E “Special Education Overview” for more details).

In order to understand overall oversight and governance from an operational perspective, discussions were held with the following individuals:

- Superintendent of Special Services
- 2 Program Coordinators

Based on discussions held with the above individuals, review of roles and responsibilities, and supporting documentation such as meeting agenda notes, it was noted that appropriate reporting structures have been established. In addition, as noted in the

TCDSB Special Education Plan (2013/14), roles and responsibilities have been documented.

However, in order to enhance overall governance and oversight, the following recommendations should be considered:

A1. The need for identification of operational and financial objectives and formalized risk assessments

Background:

Given the size of the special education budget, it is important that financial and operational objectives are established by management, including the identification of risks to achieving those objectives. *“Risk assessments involve a dynamic and iterative process for identifying and analyzing risks to achieving the entity’s objectives, forming a basis for determining how risks should be managed. Management considers possible changes in the external environment and within its own business model that may impede its ability to achieve its objectives”.*¹

Observation:

The board has established goals to improve program delivery by exceptionalism. There is documentation and monitoring in place in relation to academic goals and objectives. However, operational and financial objectives are not formally established or linked. Based on discussions with the Superintendent of Special Services, there are a number of operational and financial risks faced by the Special Services department. Some of these include:

- Spending over ministry allocations,
- Limited insight into the budget and planning process,
- Contractual and other operational limitations that limit shifts in SET's and EA's between schools to meet changes in demand, and
- The need for improved communication and coordination between Special Services and other departments such as Finance and HR,
- Information systems not sufficient to enable management of service delivery.

Without a formal process for identifying and documenting key operational and financial objectives (in addition to academic related objectives), as well as the associated risks to achieving these objectives, management cannot effectively ensure that risks are being monitored, controls and other actions are being implemented to mitigate risks, and that objectives are being met.

¹ COSO (Integrated Control – Integrated Framework), 2013

Recommendation:

Formally identifying and documenting key operational and financial risks is an important first step in establishing a risk management process. This will also assist with longer term planning and decisions around resource allocation and service delivery (see Observation #B1). As risks are identified, management should continue to monitor them and identify potential strategies to mitigate the identified risks.

Management Response:

The following operational and financial risks have been identified and documented by special education department staff as a result of its plenary meeting held on April 2, 2015:

- Incorrectly identified and placed students resulting in:
 - Unnecessary/Increases in Teacher ISP Staffing
 - Additional Case Conferences with SBSLT Staff and Parents
 - IPRC Appeal Costs, Litigation, Human Rights Tribunal
- Poorly created and documented IEPs result in unnecessary resource commitment and use:
 - Teachers
 - Education Assistants
 - CYWs
 - Contract Support Staff
 - SEA Equipment (Computer and Furniture)Equipment
- Sub-optimal school organization (LSAC and LSSSAC) with respect to students with special education needs resulting in:
 - Supervision gaps requiring additional support staff
 - Instructional gaps as per IEPs requiring additional education assistants and/or teachers
- Contract constraints which prohibit assigning support staff based on individual student need as outlined in the IEP due to seniority surplus rules results in the over assignment of redundant support staff.
- Political process with respect to service level expectations and entitlements
- The use of incompatible and/or different databases and files among HR and Special Services resulting in duplication of effort and inefficiencies.
- Non-comprehensive Crises Prevention and Intervention in-services and tracking exposing the Board to work refusals, litigation, special education appeals.

A2. More formalized reporting from the school level to the board level

Background:

As noted above, from an operational perspective, significant responsibilities are carried by the Program Coordinators, APT's/PAT's, and school principals.

Observation:

Although Program Coordinators meet regularly with the Superintendent, formalized reporting processes did not appear to be established from the school level to board level management.

Recommendation:

Given that schools are largely responsible for managing the delivery of special education programs and services, staffing, and other operational matters, more formalized reporting in these areas should be established so that schools are accountable and senior management is able to maintain appropriate oversight. Management should identify ways in which more formalized reporting can be established, without being too onerous for schools to complete. The focus should be on the two key operational areas – resource allocation and service delivery. This could include IEP trend data, year over year comparisons and commentary, special education staffing utilization etc.

Management Response:

Currently teacher staffing is determined by panel and is based on the number of special education identifications and placements.

The Education Act holds school principals responsible for the timely development and delivery of the Individual Education Plans (IEP) for the students in their schools.

Special education staff will deliver annual, mandatory principal in-services around the development and delivery of the IEP and its best practices as they evolve and are communicated by the Ministry of Education, Special Education Branch. As the curriculum leader in the school, principals would be expected to train and retrain teachers with respect to the IEP as needed.

Special education staff will ensure that principals collect and deliver local teacher special education timetables to their field supervisory officer and the TSU/TECT Joint Special Education Committees twice per year by October 31st and March 31st respectively.

The Support Staff for Student Needs (SSSN) database be recreated annually and audited on a spot-check basis throughout the year for currency and accuracy.

B. Resource Allocation

Over 90% of total special education spending is for staff resources (i.e. SET's, EA's, paraprofessionals and contract support staff) – see Appendix D for details. The process for staff allocation begins with headcount information received from Finance for the following year. This usually occurs in May, concurrently with the boards annual budgeting cycle. Special Services management will then follow a process for SET (including Individual Support Program (ISP) and Itinerant teachers) and EA allocations to individual elementary and secondary schools based on a variety of factors. For Elementary SET, Empower Reading Teachers, ISP and Itinerant teachers, the allocations are based on IEP placements and caseloads. Typical SET allocations in elementary schools range from 0.50 – 2.50 per school. ISP classes are held in selected schools to accommodate students for larger geographic areas. Based on enrolment data, approximately 14% of identified students attend an ISP class (1,189/8,732 for FY2014/15). See below for a breakdown of ISP classes by exceptionality:

Number of ISP Classes By Region 2014/15

	Autism	Behavioural	Blind and Low Vision	Developmentally Delayed	Gifted	Hearing Impaired	KIND	Language Impairment	Learning Disabled	Arrowsmith	Multiple Exceptionalities	Physical Disability	MID	Total Congregrated Classes
Total	5	17	0	11	6.5	7	5	29	24	4	52	0	5	165.5

Source: TCDSB 2014/15 Data

ISP Enrolment Statistics for School Year 20142015 - All Elementary Schools

	Grade 01	Grade 02	Grade 03	Grade 04	Grade 05	Grade 06	Grade 07	Grade 08	Grade JK	Grade SK	ISP Enrolment 14/15 Total
2014/15 Total	90	116	137	109	127	183	168	198	14	47	1,189
2013/14 Total	87	128	112	126	152	172	213	177	15	49	1,231
% change	3.4%	-9.4%	22.3%	-13.5%	-16.4%	6.4%	-21.1%	11.9%	-6.7%	-4.1%	-3.4%

Source: TCDSB 2014/15 Data

Key Findings

B1. Special education spending in excess of ministry funding allocations

Observation:

The funding shortfall in Special Education was estimated at \$19.7 million for FY2014-15 (See Appendix D – Special Services Budget and Staffing). The projected funding shortfall has declined from the prior year as a result of full day kindergarten (FDK), estimated at \$7.4 million, being fully integrated in the grants for student needs (GSN's). Historically, and projected by management to continue, special education spending has exceeded ministry funding and represents the largest single deficit program area in the TCDSB. However, no formal plans were noted to address longer term funding shortfalls.

	FY2011-12	FY2012-13	FY2013-14	FY2014-15
<i>(millions)</i>	Actual	Actual	Revised Estimates	Estimates
Total Special Education spending	149.8	145.0	149.3	150.5
Total Revenues	129.9	127.9	128.3	130.8
Surplus/(Deficit)	(19.90)	(17.10)	(21.00)	(19.70)

Source: 2014-15 Budget Estimates Report - Appendix H

In order to address funding shortfalls as the demand for special services continues to grow the Board has been drawing funds from other program areas – mainly the ESL grant and Learning Opportunities Grant (LOG).

The Special Services department has been managing their resources based on staffing allocations provided to them by Finance and supplemental amounts for contract staff from HR. Based on discussions with the Superintendent of Special Services, most of the additional spending is in relation to support staff (EA's and CYW's). For example, additional support staff needed as a result of FDK and the growth in students with autism is estimated at approximately \$5 million. Contract support staff to supplement EA shortfalls or changing demand at a school during the year (i.e. for emergencies that impact student safety) is estimated at approximately \$3.5 million, with the balance in the number of special education teachers.

Although efforts are made on an overall basis to ensure that a balanced budget is achieved for the Board (which includes reallocating funds where permitted, finding spending efficiencies and savings etc.), additional efforts are required by individual program areas (especially those where spending in excess of ministry funding occurs) to understand their needs and how they can be appropriately addressed. This will allow for open and transparent discussions to facilitate more proactive management of spending in key areas such as special education going forward.

Recommendation:

A comprehensive analysis of the special education needs and budget is recommended in order to form a longer term plan to address funding shortfalls and service delivery impacts. This should be a collaborative effort between senior management from multiple departments, including Finance, Special Services, HR and others as appropriate.

Although special service needs are constantly changing based on student demand and exceptionality, an important first step is to use trend data to form longer term planning decisions. Part of this exercise can include understanding the “ideal state” and the resources required to provide optimal service delivery, the minimum service delivery that can be provided based on Ministry funding, and the “current state”, which currently lies somewhere between those points. Linkages should be made to a formalized risk analysis (see Observation #A1 above), especially in the event that current sources of additional funding become at risk in the future. Accordingly, contingency plans should be in place for alternative service delivery with communication to key stakeholders.

Management Action Plan:

Special education staff will investigate the formal establishment of a system level Special Education Allocation and Planning Staff Committee (SEAP) to oversee the allocation of Special Education Support Staff, i.e. Educational Assistants and Child & Youth Workers, with the following membership:

- Superintendent of Special Education
- Superintendent of Finance
- Superintendent of Human Resources
- Superintendents of Schools (2)
- Elementary School Principals (2)
- Secondary School Principals (2)
- Associate Director of Academic Affairs

B2. Greater insight into the budget and planning process

Observation:

Based on discussions with the Superintendent of Special Services, greater insight into the overall budgeting process and how it impacts their funding allocations would help with decision making.

For example, as noted above, Finance provides Special Services with headcount information and the total budget allocation annually. Although SEAC approves the Special Services budget prior to the Board of Trustees final approval, additional feedback and involvement from Special Services in the process (prior to SEAC and Board of Trustee approval) will allow for more informed decision making around resource allocation decisions and longer term planning (see Observation #B1 above).

Recommendation:

Greater collaboration between Special Services management and Finance is recommended, both on an ongoing basis as well and as part of the annual budgeting process. This will allow for a better understanding of funding formulas, sources of funding and potential savings and will inform longer term planning.

Management Response:

Special Education and Business Services staff will work collaboratively to ensure that budget lines related to special education revenue and expenses be created, monitored and controlled jointly and that each line accurately describes specific operational expenses.

Special Education and Business Services staff will ensure that any in-year line item changes be co-signed by the superintendents of special education and finance.

Business Services staff will investigate the provision of more detailed reporting on a quarterly basis for the functional areas contained within Special Education Programs & Services.

B3. EA Staffing Allocation Model

Background:

EA staff is by far the largest complement of special education support staff (see Appendix D). However, based on dollars spent, salaries (excluding benefits) for elementary SET's were more than 50% higher than EA's. See below for a summary of elementary staff:

Cost per SET and EA (excluding benefits) – Elementary – FY2014/15:

	Salaries	FTE's	Cost/FTE
SET's	\$ 41,314,498	486	85,079
EA's	\$ 26,370,407	723	36,474

EA's and CYW's are allocated starting with the Support Staff for Student Needs ("SSSN") database. Every year, teachers are required to complete a questionnaire in the database. This forms the basis upon which a model is used to adjust EA/Needs ratios for the accumulated 'needs points' generated for three categories of individual needs: low level support, medium level and high. There are over 24,000 individual student records in the raw data base. Although a good starting point, it was noted that many adjustments are made to these ratios. Based on discussions with the Superintendent, there are many reasons for adjustments, including difficulties moving staff to other schools once they have been allocated.

Observation:

Review of the allocation model showed that only approximately 50 schools had EA/CYW allocations less than the model suggested, while the balance (approximately 150 schools) had EA allocations greater than the model suggested because of adjustments made. As per discussion with the Superintendent, this is in order to reflect actual needs as determined by board management and their knowledge of support needs at individual schools. In discussions with Board staff, it was noted that responses to questionnaires in the database are not verified on a regular basis. There is a risk that some schools may report higher needs than required, although this is mitigated by the Superintendent and Program Coordinator review of the EA allocations prior to finalization. It was also noted that the SSSN database records are not reset every year. Therefore, student profiles may not be current or based on current needs.

Recommendation:

Although the SSSN database is a good starting point, Management should explore other ways in which demand can be more accurately measured in order to ensure equitable allocation of EA resources to schools that require the most support. Additionally, it is recommended that the SSSN database records are reset annually in order to reflect current needs.

Management Response:

Special Education staff plan to continue to base September support staff allocations on the Support Staff for Student Needs (SSSN) database and to reset it yearly, audit at mid-year and incorporate into the Form 100/106/107 staffing reporting and control process.

Special Education staff will continue to ensure that principals, special education teachers and special education department heads are in-serviced on the SSSN database's continuous improvement and completion each year.

B4. Staff Resource Allocation (SET's and EA's)

Observation:

While the Board has an established and observable process for allocating SET's and EA's to schools based on resources available and need, it was noted that there is not a consistent method for the allocation and scheduling of SET's and EA's in a particular school. Discussion with the Program Coordinators revealed that each school principal is responsible for the scheduling of SET's and EA's and the method of scheduling and monitoring can vary from school to school.

The RIAT was unable to interview a sample of principals to determine how allocation and scheduling for special education staff is determined. However, it was noted that the Board does not provide schools with a schedule template or guidance for scheduling SET and EA staff. However, due to the daily changing needs of special education students, timetabling for SET's and EA's can be particularly challenging and staff must remain flexible to meet these needs.

Recommendation:

It is recommended that Special Services department communicate guidance to schools for the format of efficient allocation and scheduling of SET's and EA's time and determine whether a consistent scheduling process could be established with the goal of increasing EA utilization and effectiveness.

Management Response:

Special Education staff will develop and deliver in-services for special education teachers and educational assistants around best practices as they relate to school organization, the need for flexible scheduling and the nature of special education placements.

Special Education teacher timetables will be requested from school principals and local staff allocation committees to be delivered to field superintendents for review.

Special Education staff will create and maintain a pool of 201 itinerant educational assistants to be maintained by Area Field Superintendents for use throughout the year.

Special Education staff recommends that CYW allocations are prioritized as follows:

1. Students with Special Incidence Portions (SIP)
2. Autism, Behaviour, Programs to Assist Social Training (PAST) & Secondary Programs
3. APPLE
4. Safe Schools

C. Service Delivery

As noted above, the school principal plays a central role in service delivery. The Special Services department focuses on service delivery through mechanisms designed to enable early identification and assessment of exceptionalities along with the creation and implementation of student IEPs. Additionally, management has developed Program Review Committees and Accountability Frameworks by exceptionality that design programs and services and report on the measurement of student performance.

Identifying and Supporting Students with Special Education Needs

Special Services provides a broad range of services and supports to students with special education needs. Central to the process is the Identification and Review Committee to formally identify and place students. An Individualized Education Plan (IEP) must be developed for every student that has been identified as “exceptional” and may be developed for students that have not been formally identified but have been deemed by the Board to require special education programs or services. Based on recent data, there are approximately 8,800 formally identified students at the Board (including giftedness), and approximately 16,600 active IEP’s.

All Students with an IEP (as at Feb. 10, 2015)				
Category			# of Students	% of Total
Identified (including gifted)			8792	53%
Not Formally Identified			7850	47%
Total IEP's			16642	100%
<i>Source: TCDSB Trillium System</i>				

The students on an IEP without formal identification are still receiving special education and support services. Based on the above data, almost half of all students are not formally identified with an exceptionality. When these students are factored in, the number of students receiving some form of special education support is much higher than indicated based on identified students with exceptionalities (i.e. 18% of all TCDSB students have an IEP – 16,642/90,639 – based on FY2014/15 enrolment estimates).

Given that IEP compliance was not considered by management to be a key risk area, the RIAT selected a small sample of 24 student IEPs for the past two years (2013/14 and 2014/15) from 8 elementary and 4 secondary schools and reviewed them to ensure that:

- student needs are being addressed by taking into account assessment data and strengths and weaknesses, and that for modified or alternative programming clearly stated goals, learning expectations, teaching strategies and assessment methods were documented; and
- IEPs are being completed in accordance with Board and Ministry requirements

Based on the testing performed, it was noted that:

- The IEPs reviewed were adequately prepared and tailored to address individual student needs
- IEPs were generally completed in accordance with Board and Ministry guidelines

The Accountability Framework for Special Education

An “Accountability Framework for Special Education” (AFSE) was developed by the Board in 2010. The main objectives of the AFSE are as follows:

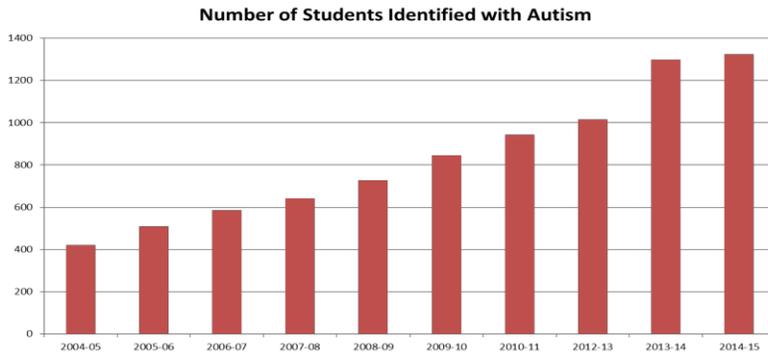
- To annually review special education programs and services in order that student achievement and well-being is reported and that programs and services are continually renewed and improved.
- To provide SEAC and the Board with timely evidentiary advice to make effective decisions related to program planning and services in special education.
- The establishment of SMART goals that align with the TCDSB Board Learning Improvement Plan.
- To support the Board’s budgetary cycle

A standing Program Review Committee (PRC) has been established for each exceptionality and meets regularly to collect and analyze student achievement and well-being data. It is an important mechanism for reaching student achievement and well-being goals set by the Ministry, including *Learning for All: K-12, Caring and Safe Schools in Ontario, Growing Success and Assessing Achievement in Alternative Areas (A4)* as well as Board goals set by the Committee.

Two Program Review Committees were selected for review (Learning Disabled and Autism) and discussions were held with each of the Program Review Committee leads. The focus of these discussions was to gain an understanding of the functioning of these committees and whether the objectives of the AFSE were being achieved. Based on our review of SMART goal setting, measuring and reporting of set goals for 2014/15 and 2013/14, the 2013 AFSE presentation to SEAC, and PRC meeting agendas and minutes for the prior two fiscal years, the AFSE appears to be working effectively towards achieving its objectives. Management and staff at the Board are commended for their efforts, many who volunteer their time to support the various PRC’s.

Autism and Learning Disabled (LD) exceptionality groups are the two largest exceptionalities in the Board (excluding gifted). LD students decreased by 20%; from 4,180 students in 2013/14 to 3,340 students in 2014/15.

Autistic students are characterized by their complexity of needs. There has been a significant increase in the numbers of students with Autism, doubling in number of students over the last 5 years. The current incidence of Autism at TCDSB is estimated to be 1 in 68² in 2014/15 (compared to 1 in 64 in 2013/14). While autistic students at TCDSB have been increasing since 2004, the number hovered at approximately 1,320 students from 2013/14 to 2014/15.



Source: TCDSB Autism Programs and Services Trend Data.

Building Capacity – Professional Development and Training

Building capacity at the school level to work with children with special education needs is important, especially given the limited resources available.

Significant efforts have been made by the board through a variety of initiatives. This includes the 12 Program Review Committees and special teams for Autism, school based support learning teams (SBSLT), staff led training as well as external training. A

Professional Development plan is developed at the beginning of the school year for topics that cover many of the many of the exceptionality areas (i.e. autism, speech and language, gifted, development disability etc.) as well as IEP protocols, special services forms etc.

Based on discussions with the Superintendent, all training was delivered in the prior year. In addition, the board is piloting an Intensive Support Program Team model in FY2014/15 which will consist of a team of experts that will train staff at the school level. Board staff is commended for their significant efforts to build capacity at the school level, of which many activities such as training are done on a volunteer basis outside of regular responsibilities.

² TCDSB Autism Programs and Services Trend Data Presentation

C1. Assessment Times and Waitlists

Background:

Psychologists are assigned to each region (north, south, east and west) and are responsible for providing a range of psychology-related services including counselling and file reviews. In many cases (except for autism and certain physical disabilities), students must receive a psychological assessment prior to receiving placement by the IPRC. Factors such as mental health, age, exceptionality and parental consent impact the timing of a psychological assessment. Based on discussion with the Chief Psychologist, an assessment typically takes thirty hours. Once a psychological assessment is performed, the assessment feedback and written report must be completed within four weeks.

The RIAT obtained the psychology backlog compilations for June 2014 and December 2014. The psychology referrals backlog includes psychology-related services such as file reviews, counselling, small group counselling and psychological assessments.

In June 2014, there were 1,653 backlogged referrals. 85% of these referrals were for elementary students. The west area has slightly more referral backlogs and it contributes to over half of the secondary students referral backlog.

Backlog - Psychology-Related Services - June 2014

# of Psychologists	Total Backlog		Elementary Backlog		Secondary Backlog		# #	
		100%		100%		100%	Elementary Schools	Secondary Schools
56	1653	100%	1406	100%	247	100%	169	32

As at December 2014, there were 1,447 backlogged referrals for psychology-related services; a 12% decrease from June 2014 (1,653 backlogged referrals). 15% (223) of these cases had been referred more than two years ago (prior to December 2012). The backlog of referrals in the west area is higher than the other areas partly due to the higher student population. However, psychology staff was not able to provide a reason for the higher overall number in that region. Please see chart below:

Total Backlog*	%	Backlog < 1 year	> 1 year Backlog < 2 years	Backlog > 2 years
1,447	100%	794	430	223

*Number of referrals

Source: TCDSB Psychology Department

Special Services and the Chief Psychologist ensure equity and fairness in handling referrals by triaging referrals based on area and psychologist, prioritizing referrals based on consistent criteria and guidelines and management oversight.

Each psychologist is assigned schools in one of the four areas. As per discussion with the Chief Psychologist, the allocation of schools to a particular psychologist is based on the number of secondary schools per staff member, total population per school and per staff member (“elementary caseload”), and the historical number and percent of referrals in the assigned schools. This allocation ensures that each psychologist is responsible for a similar number of schools, student population, caseload, and an even and equitable share of referrals. Psychologists also work collaboratively with Principals and school teams to respond to school needs.

In order to manage and reduce the backlog, the Department of Psychology has established a list of criteria for prioritizing current referrals and a separate set of criteria for prioritizing existing backlogged referrals. Prioritizing existing referrals (backlogged referrals) is based on a high, medium and low assessment. Those referrals that are considered “high” priority are comprised of referrals for students whose behaviour puts themselves or others at risk, students dependent upon their referral for access to ISP or transitioning programs, students whose outside report is to be reviewed for programming or an IPRC meeting, and any referrals that are two years or older.

Referrals that are two years or older are typically the result of initially being considered a low priority referral (i.e. current intervention strategies have been successful). Referrals that are two years or older are considered “high” priority since September 2013. This is due to an increased emphasis on meeting the needs of students that have been waiting for an increased period of time for services and reducing the backlog. In some cases, a referral that is older than two years may result in a cancellation if the student no longer needs the referral.

Certain referrals are also brought to the attention of the Chief Psychologist due to environmental or political pressures. In these cases, the Chief Psychologist will work with staff, parents and other key stakeholders to come to a resolution.

Observation:

A sample of 30 students from across all four regions was selected that were two years outstanding or older. As a result of the prioritizing guidelines issued by the Special Services Department, all 30 of the students selected have been reprioritized as “high” on the list of backlogged referrals to receive services from a Board psychologist.

Sample Profile - Length of Time of Backlogged Psychology Referrals (at March 2015)

Year of Referral	Years Outstanding	Number of Referrals
2012	2	8
2011/12	3	15
2010/11	4	6
2009	6	1

It was observed that 27 of the 30 students sampled had an active IEP and has been receiving special education services and supports since the time of their referral. 3 out of the 30 students sampled did not have an active IEP for the 2014/15 school year. See below for explanations:

- Student A (#24) was identified as not requiring an IEP as they were performing at grade level and prior year testing met provincial standards (Grade 3 EQAO scores at Level 3). Some informal accommodations were being provided to the student but an IEP for modifications was determined by the school not to be required. It was indicated that the school would communicate with the students' parents in order to note a psychological assessment was no longer required.
- Student B (#22) was a grade 6 student that was receiving some accommodations in language and math and was in the process of undergoing an assessment to determine whether an IEP was required. Other students were prioritized ahead of Student B were considered higher priority.
- Student C (#18) transferred out of the TCDSB during the FY2014/15 school year, but had active IEP's in previous years.

Based on the above testing, it was noted that in almost all cases sampled students on the waitlist were receiving special education support, either through a formal IEP (27 out of 30), informally through other accommodations when the level of support required was low (2 out of 30), or in prior years before a transfer (1 out of 30).

The reporting of back log data is performed twice a year in December and June to the Chief Psychologist. It was noted that there is no system in place to manage referrals centrally within the Board. Therefore, each psychologist is responsible for managing their referrals and wait lists, maintaining their caseloads and updating the Chief Psychologist on the status of their case load and referrals twice a year. This is a manual process. Each regional office maintains a list of the referral backlog for their area. However, there is no tracking of completed referrals. Additionally, the back log reporting aggregated by the Chief Psychologist does not provide further data about the type of service requested in the referral.

Without a centrally driven system to manage all referrals, the Chief Psychologist is unable to obtain real-time, accurate data on the status and details of referrals in order to effectively respond to and manage the allocation of staff resources to the demand for psychologyservices. The backlogged data is compiled twice per year for review and remains a manual process.

While there are mechanisms and guidelines in place to ensure assessments are triaged fair and equitably, there is no central system in place at the Board level to manage referrals. A centrally driven system would allow for regular monitoring of case loads and referrals, allowing the Chief of Psychology to directly enforce the guidance for prioritizing referrals and staff members to work collaboratively to manage their caseloads (i.e. transitioning cases when there is a change in staff member). In addition, a centrally driven system would allow for access to current real-time data allowing for resources to be distributed on a needs basis.

Proposed Recommendations

- C.1 It is recommended that the Chief of Psychology, in conjunction with key stakeholders in Special Services, review the system for tracking and managing referrals and determine the most efficient and optimal frequency for back log reporting and the key data required to help triage and manage referrals in a fair and equitable manner. This could include exploring case management software tools (see section D below).
- C.2 It is our understanding that Psychology staff are required to review their waitlist students with the Principal and SET at the beginning of each school year to prioritize or remove from the list as required. It is recommended that the Chief of Psychology and staff psychologists review their referral lists at least once more during the school year (i.e. midway through the school year) to make a determination as to whether the need for psychological services remain for the student, ensure backlogged referrals are properly prioritized, and an active IEP exists allowing the student access to special education and support services. This would minimize instances where students are no longer in need of an assessment appearing on the list, allow for more accurate backlog reporting which in turn results in better allocation of psychologists during the school year based on caseloads.

Management Response:

Special education staff agrees and support the recommendation and will investigate the purchase and/or development in-house of a case management software system and process to be used by all special education departments:

- Psychology
- Social Work
- Speech and Language
- Autism

Special education staff will prepare a report for Board recommending the need for case-management software. The tool will have both quantitative and qualitative measures and be student focused.

Psychologists will review their referral backlogs with each of their principals in September and January and report student needs to the Chief of Psychology, the Superintendent of Special Education and the Special Education Advisory Committee / Board.

D. Information Systems and Management

The Special Education department has information systems available for tracking data to support decision making that include the Student Support Services Needs Database (SSSN), web-based IEP platform, Trillium, ONSIS, and Data Integration Platform (DIP).

The SSSN is a database of student profiles (based on a questionnaire designed to gauge student needs) that are completed by the schools. As noted in Section C above, the SSSN database is used a starting point to determine EA allocations. It was observed that the number of records in this database (approximately 24,000) far exceed the number of students with identified exceptionalities due to the needs of the schools' general population of students.

The IEP web based platform is a repository for Special Services forms and all IEP data and forms by student. All IEP platform data is uploaded to the Trillium system daily which in turn is uploaded regularly to the Ministry of Education's ONSIS system. This system is used mainly by the school staff and Program Coordinators to complete IEP's, follow-up on individual student cases and to support resource allocations of EA's and CYW's at the secondary level.

DIP is a board-wide system that is not specific to Special Services. It comprises records and evaluation data for all students from all existing Board platforms.

Key Findings

D1. The need for enhanced information systems and reporting

Background:

Students receive special education support from a number of staff, including teachers, principals, and special education support staff (SET's, EA's, ISP teachers, psychologists, social workers, speech and language pathologists etc.). In addition, when required, Program Coordinators and Assessment and Programming Teachers often correspond with principals and parents regarding students for a variety of reasons. Currently, these interactions (i.e. phone calls, meetings and consultations, student referrals and student case notes) are being managed on an ad-hoc basis.

Observation:

Based on discussions held with board level staff, the following was noted:

- Program Coordinators are notified of escalated issues for resolution through phone calls and emails from schools regarding students with special education needs. These issues and associated correspondence are not logged and past emails regarding the student are relied upon to inform Program Coordinators' discussions

with teachers, principals or parents. This makes it difficult to keep track of information regarding the student, both for the school and other support staff;

- Student referrals for (psychology and speech and language) services are manually tracked by the area secretary and staff member but are not centrally logged electronically. This makes it difficult to determine current status and levels of demand, manage case loads, and make timely resource allocation decisions.
- It was noted that in 2014 a quote was obtained by the psychology and speech pathologist groups from a software vendor for a case management tool to maintain and manage case files. It is our understanding that the Social Work department has a separate case management system already in place.

Management Response:

D.1.1 Special Services management staff will investigate methods for collecting data on issues escalated to them for resolution in order to direct attention to persistent areas of concern on a board-wide basis, allow for performance measurement and enable further organization.

D.1.2 Special Services management staff will conduct a thorough analysis of existing information systems to identify information gaps and areas for potential improvement. This includes identifying ways in which current systems can be used to address some of the issues noted above. In addition, depending on the results of the system review, if additional tools are identified as necessary (i.e. case management software), department wide needs should be considered (not just those of individual teams). All requests or needs should be supported by a detailed business case with approval from the Superintendent and others as required.

D2. Records Management and Privacy

Based on discussions held with Board level staff, the following observations were noted:

- Currently, psychology case files are held in paper format by the individual psychologist. Historical case files are maintained in their associated regional office in paper format.
- There is no clear responsibility for file and records management. Regional office secretaries are informally requested to maintain the filing system and record any file activity (i.e. check-out files). It was conveyed to the RIAT, that occasionally files are left out, consequently affecting privacy concerns, due to lack of resources.
- Although there is a central shared drive for psychologists to maintain electronic files, not all files are electronic and often times psychologists work in environments that are not conducive to working from electronic devices.

Recommendation:

D.2.1 It is recommended that the Superintendent of Education, Chief of Psychology and other key stakeholders work collaboratively to investigate options and implement a method for file management and storage that alleviates pressures on resources, space and privacy.

Management Response:

Special education staff will investigate the recommendations in both D.1 and D.2

With respect to file and records management, Special Education staff will investigate and identify an individual to co-ordinate and operationalize the process.

APPENDIX A – ACKNOWLEDGEMENTS

We would like to take this opportunity to thank the management and staff of the TCDSB for their assistance during this engagement.

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APPENDIX B – REPORT DISTRIBUTION

This report has been distributed to the following individuals: Toronto

Catholic District School Board Audit Committee Angela Gauthier,

Director of Education

Gary Poole, Associate Director of Education Frank

Piddisi, Superintendent of Special Services

Cristina Fernandes, Superintendent of Early Learning Paul

DeCock, Comptroller, Business Services

APPENDIX D – SPECIAL SERVICES BUDGET AND STAFFING

EXPENSE	2011-12 Actuals	2012-13 Actuals	2013-14 Revised Estimates	2014-15 Estimates	Change	
					\$	%
ELEMENTARY						
Classroom Teachers	41,155,862	37,991,710	40,408,756	41,314,498	905,742	2.2%
Occasional Teachers	1,788,372	1,436,073	1,788,372	1,788,372	0	0.0%
Education Assistants	28,281,358	26,264,085	25,719,003	26,370,407	651,404	2.5%
Professional & Paraprofessionals	7,347,890	7,565,538	7,671,831	7,824,254	152,423	2.0%
Benefits for staff above	15,307,680	15,275,180	14,203,136	14,524,368	321,232	2.3%
Staff Development	274,878	381,532	305,320	305,320	0	0.0%
Special Education Equipment (SEA)	1,756,610	1,122,380	4,597,100	3,055,582	(1,541,518)	(33.5%)
Instructional Supplies & Services	850,770	667,366	850,770	850,770	0	0.0%
Fees & Contractual Services	3,489,806	3,791,090	3,489,806	3,489,806	0	0.0%
TOTAL ELEMENTARY	100,253,226	94,494,954	99,034,094	99,523,377	489,283	0.5%
SECONDARY						
Classroom Teachers	19,412,404	21,250,516	20,548,336	20,957,210	408,874	2.0%
Occasional Teachers	939,122	1,079,187	939,122	939,122	0	0.0%
Education Assistants	14,581,471	14,318,903	13,523,830	13,850,762	326,932	2.4%
Professional & Paraprofessionals	3,341,992	3,548,509	3,342,003	3,402,404	60,401	1.8%
Benefits for staff above	7,441,880	6,860,911	7,388,480	7,541,863	153,383	2.1%
Staff Development	7,373	4,737	6,812	6,812	0	0.0%
Special Education Equipment (SEA)	12,565	1,288	948,843	630,673	(318,170)	(33.5%)
Instructional Supplies & Services	220,758	103,313	220,758	220,758	0	0.0%
Fees & Contractual Services	26,400	133,733	26,400	26,400	0	0.0%
TOTAL SECONDARY	45,983,965	47,301,097	46,944,584	47,576,005	631,421	1.3%
PROGRAM COORDINATION						
Coordinators & Consultants	385,233	159,854	389,823	416,432	26,609	6.8%
Benefits for staff above	97,439	13,581	56,790	60,666	3,876	6.8%
Supplies			39,000	39,000	0	0.0%
TOTAL PROGRAM COORDINATION	482,672	173,435	485,613	516,099	30,486	6.3%
SECTION 23 PROGRAMS						
Principals & VPs	266,058	455,346	261,944	263,844	1,900	0.7%
Classroom Teachers	2,130,919	1,957,744	1,985,162	2,025,302	40,140	2.0%
Ed. Assistants	182,866	176,137	195,424	199,228	3,804	1.9%
Supplies	66,480	26,412	73,395	73,395	0	0.0%
TOTAL SECTION 23 PROGRAMS	2,646,323	2,615,639	2,515,925	2,561,769	45,844	1.8%
BEHAVIOURAL EXPERTISE PROGRAMS						
Salaries and Benefits	432,550	452,937	322,099	336,702	14,603	4.5%
TOTAL BEHAVIOURAL PROGRAMS	432,550	452,937	322,099	336,702	14,603	4.5%
TOTAL SPECIAL EDUCATION EXPENSE	149,798,736	145,038,062	149,302,315	150,513,951	1,211,636	0.8%
TOTAL REVENUES	129,871,055	127,864,143	128,263,490	130,813,002	2,549,512	2.0%
SURPLUS / (DEFICIT)	(19,927,681)	(17,173,919)	(21,038,825)	(19,700,948)	1,337,877	(6.4%)

			FY2014-15	
			Estimates	% of Total
Teachers, Occasionals, EA's and paraprofessionals			91.8	61.0%
Other (SEA, supplies etc.)			7.7	5.1%
Total Elementary spend			99.5	66.1%
<u>Secondary</u>				
Teachers, Occasionals, EA's and paraprofessionals			46.7	31.0%
Other (SEA, supplies etc.)			0.9	0.6%
Total Secondary spend			47.6	31.6%
Program Coordinators			0.5	0.3%
Other (s. 23, behavioural expertise etc.)			2.9	1.9%
Total Other			3.4	2.3%
Total Spec. Ed. Spending			150.5	100.0%

Elementary Special Education Teacher Allocation (FY2014-15)

Staff Category	# of teachers	% of total
SET teachers	206	42.4%
ISP	214.5	44.2%
Central Autism	9.5	2.0%
BEA/Connections	2	0.4%
Hospital for Sick Kids	2	0.4%
Deaf & Hard of Hearing	12.6	2.6%
Section 23	8	1.6%
APT	31	6.4%
Total Other Support Staff	65.1	13%
Total Special Education	485.6	100%

Source: Summary of Special Education Allocation 2014/15

Education Assistant Allocation (FY2014-15)

Special Education Assistants (EA)	1029
Child and Youth Worker (CYW)	184

APPENDIX E – SPECIAL EDUCATION OVERVIEW

As per the Ministry of Education:

What is an IPRC?

[Regulation 181/98](#) requires that all school boards set up an Identification, Placement and Review Committee (IPRC). An IPRC is composed of at least three persons, one of whom must be a principal or supervisory officer of the board.

What is the role of the IPRC?

The IPRC will:

- decide whether or not the student should be identified as exceptional;
- identify the areas of the student’s exceptionality, according to the categories and definitions of exceptionalities provided by the Ministry of Education;
- decide an appropriate placement for the student; and
- review the identification and placement at least once in each school year.

Who is identified as an exceptional pupil?

The **Education Act** defines an exceptional pupil as “a pupil who’s behavioural, communicational, intellectual, physical or multiple exceptionalities are such that he or she is considered to need placement in a special education program....” Students are identified according to the categories and definitions of exceptionalities provided by the Ministry of Education.

What is a special education program?

A special education program is defined in the **Education Act** as an educational program that:

- is based on and modified by the results of continuous assessment and evaluation; and
- includes a plan (called an Individual Education Plan or IEP) containing specific objectives and an outline of special education services that meet the needs of the exceptional pupil.

What are special education services?

Special education services are defined in the **Education Act** as the facilities and resources, including support personnel and equipment, necessary for developing and implementing a special education program.

What is an IEP?

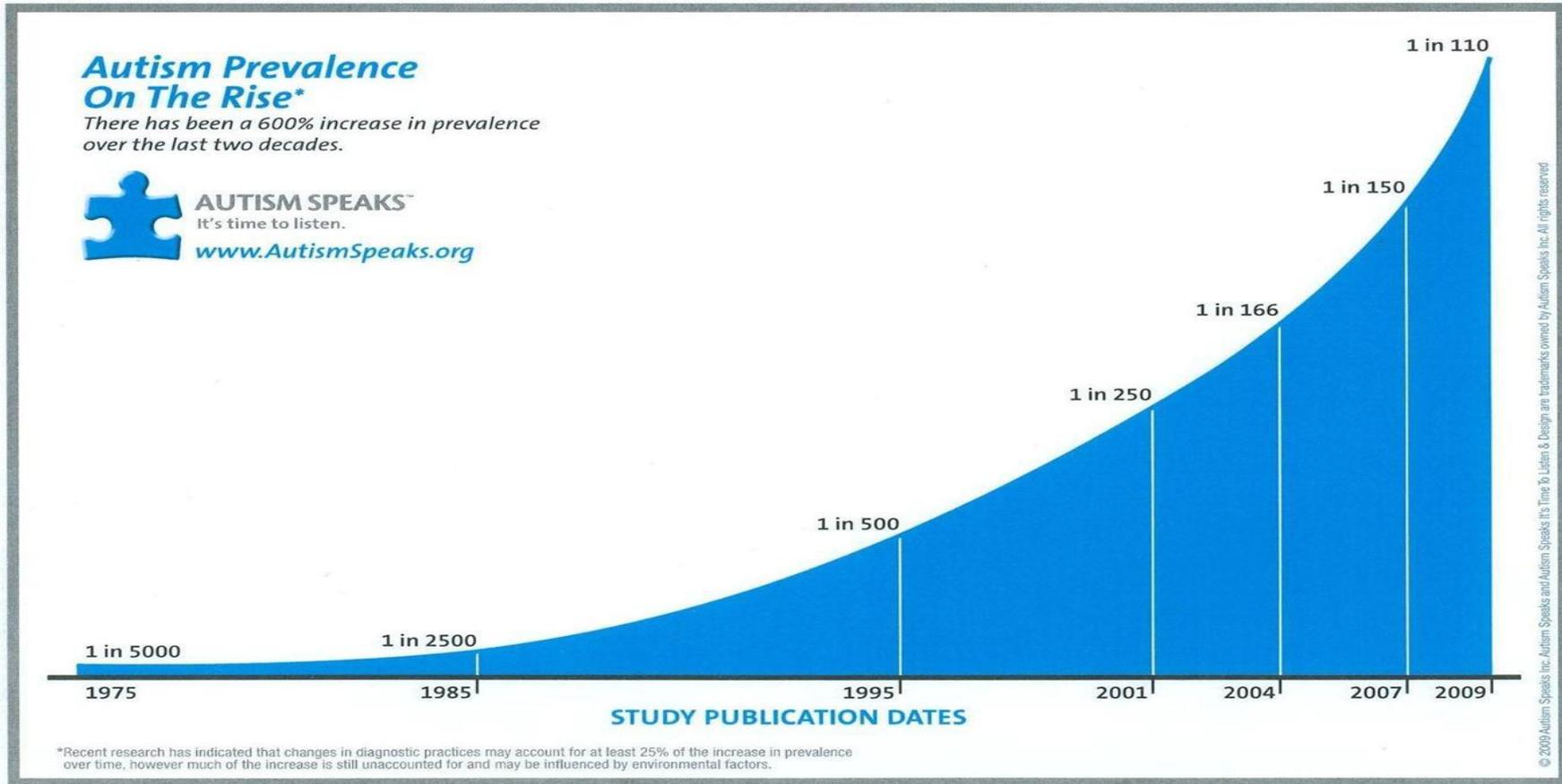
The IEP must be developed for a student, in consultation with the parent. It must include:

- specific educational expectations;
- an outline of the special education program and services that will be received;

- a statement about the methods by which the student's progress will be reviewed;
and
- for students 14 years and older (except those identified as exceptional solely on the basis of giftedness), a plan for transition to appropriate postsecondary school activities, such as work, further education, and community living.

The IEP must be completed within 30 days after the student has been placed in the program, and the principal must ensure that the parent receives a copy of it.

APPENDIX F – AUTISM INCIDENCE AT THE TORONTO CATHOLIC DISTRICT SCHOOL BOARD



APPENDIX G – EXCEPTIONALITIES AND PLACEMENTS

The Ministry of Education formally recognizes the following 12 exceptionalities:

- Behaviour
- Autism
- Deaf and hard-of-hearing
- Language impairment
- Speech impairment
- Learning disability
- Giftedness
- Mild intellectual disability
- Developmental disability
- Physical disability
- Blind and low vision
- Multiple exceptionalities

Special Education Placement

Once formally identified by the Identification and Placement Review Committee (IPRC), placement is made into one of 5 categories as per Ministry of Education regulations:

- **Regular Class with Indirect Support** - where the student is placed in a regular class for the entire day, and the teacher receives specialized consultative services.
- **Regular Class with Resource Support** - where the student is placed in a regular class for most or all of the day and receives specialized instruction, individually or in a small group, within the regular classroom from a qualified special education teacher.
- **Regular Class with Withdrawal** - where the student is placed in a regular class and receives instruction outside the classroom, for less than 50 per cent of the school day, from a qualified special education teacher.
- **Special Education Class with Partial Integration** - where the student is placed by the IPRC in a special education class in which the student-teacher ratio conforms to Regulation 298, section 31³, for at least 50 per cent of the school day, but is integrated with a regular class for at least one instructional period daily.
- **Special Education Class Full Time** - where the student-teacher ratio conforms to Regulation 298, section 31, for the entire school day.

³ Teacher/Student ratio of 1:6 for autism classes and 1:16 for other exceptionalities