
MINISTRY OF EDUCATION

3.06—Special Education Grants to School Boards

BACKGROUND

There were about 2 million students enrolled in Ontario's publicly funded schools in the fall of 2000, of whom over 260,000, or 12.5%, were receiving special education programs and services. Students may be identified as requiring such programs and services either formally or informally. Under the *Education Act*, students formally identified are described as exceptional by an Identification, Placement and Review Committee (IPRC). The *Education Act* defines an exceptional pupil as one "whose behavioural, communicational, intellectual, physical, or multiple exceptionailities are such that he or she is considered to need placement in a special education program."

Some school boards, in consultation with parents, provide special education programs and services for students without referring them to an IPRC to determine if they are exceptional or not. Notwithstanding this practice, boards are required to refer a student to an IPRC at the request of a principal or, through the principal, at the request of a parent.

The strengths and needs of students with special needs vary widely. At one extreme are students who are gifted, while at the other are students requiring very intensive supports. Students whose only needs are physical, such as those with sight or motor disabilities, may be quite capable of meeting provincial grade-level curriculum and achievement expectations with appropriate accommodations such as access to assistive equipment or resources. The majority of students with special needs, however, require accommodations as well as some modification to the curriculum to help them progress.

For the school year ending August 31, 2001, the Ministry of Education provided special education grants to school boards in the amount of \$1.36 billion. This funding represented about 10% of the \$13.6 billion that school boards were expected to receive for that year. Most funding to school boards is based on total enrolment and is intended to cover the common basic costs of all students, including students with special needs. Special education grants are intended to cover only the incremental costs of educating students with special needs.

AUDIT OBJECTIVES AND SCOPE

Our audit objectives were to assess the adequacy of the Ministry's procedures for ensuring that:

- school boards comply with special education legislation, regulations, and policies; and
- sufficient, appropriate, and reliable financial and performance information is reported to enable the Ministry and school boards to assess the extent to which special education programs and services:
 - meet exceptional students' needs; and
 - are delivered economically and efficiently.

Our audit was conducted in accordance with professional standards for assurance engagements, encompassing value for money and compliance, established by the Canadian Institute of Chartered Accountants, and accordingly included such procedures as we considered necessary in the circumstances.

Our work at the Ministry focused on special education grants administration activities conducted by the Elementary/Secondary Business and Finance Division and on policy development activities conducted by the Special Education Project within the Ministry's Strategic Planning and Elementary/Secondary Programs Division. However, we needed to obtain an understanding of how school boards administer their special education programs and services in order to address our audit objectives. We therefore visited four English-language school boards to review their special education programs, services, policies, and procedures and to interview a sample of educators and parents of children with special needs. We interviewed over 300 parents, administrators, principals, teachers, and support staff, including special education resource teachers, psychologists, speech and language pathologists, social workers, and special education assistants. We also met with representatives of several advisory and advocacy groups for students with special needs.

The criteria we applied to perform our assessment and to reach our conclusions were agreed to by senior management at the Ministry and the school boards that we visited.

The Ministry's Internal Audit Services Branch had not done any recent work that would allow us to reduce the extent of our work.

Our fieldwork was carried out from September 2000 to April 2001.

OVERALL AUDIT CONCLUSIONS

Currently the accountability framework for special education grants and the delivery of special education services is evolving. The Ministry has a multi-year plan and has taken a number of steps and initiatives to design a system for the provision of special education grants and services. However, presently, the Ministry and school boards do not have the information and processes to determine whether special education services are delivered effectively, efficiently, and in compliance with requirements. In particular, we noted the following:

- The Individual Education Plans that schools are required to prepare for each student with special needs met neither the requirements of Regulation 181/98 under the *Education Act*

nor the suggestions for good practice in the Ministry's *Individual Education Plan (IEP) Resource Guide (1998)*.

- Neither the Ministry nor school boards had established the quality-assurance processes necessary to ensure compliance with the *Act's* requirements that all exceptional students have available to them appropriate programs and services and that they receive them in a timely manner.
- The main concerns of the many educators we interviewed were insufficient numbers of teacher assistants and experienced special education resource teachers. As a result, the educators believed that many of their students were not getting the support they required.
- The Ministry's standards for school-board special education plans do not require that trustees establish measurable performance targets for school-board management so that their effectiveness in providing service to students with special needs can be determined.
- Several educators we interviewed were also concerned that teacher education did not adequately prepare the many new teachers entering Ontario's education system to meet the demands of delivering special education programs and services, although significant reforms were underway.
- The Ministry did not have procedures in place to ensure that school boards provide comparable and reliable information about their special education expenditures in order to facilitate meaningful analysis and support funding decisions.
- The information available on school-board spending by activity or program is insufficient for management at school boards to manage costs effectively. As a result, the Ministry, trustees, Special Education Advisory Committees, and parents cannot assess how effectively management has spent special education funds, nor can we provide any reasonable assurance in this regard.

Because of their ongoing relevance to our audit, we also noted (see Appendix) the status of the 15 recommendations made in 1994 by the Standing Committee on Public Accounts, which were based on the audit of special education in our *1993 Annual Report*. In summary:

- four recommendations had been implemented;
- progress had been made and was ongoing on six recommendations; and
- five recommendations had not been implemented.

We have made further recommendations on these issues in this report.

We noted that since our last audit, the Ministry has introduced major changes to Ontario's education system that were intended to improve its equity, quality, efficiency, and accountability. The most significant changes aimed specifically at programs and services provided to students with special needs began to be implemented in 1998 and are ongoing. For example, special education funding reform was first introduced for the 1998/99 school year and has been undergoing refinements that the Ministry expects to complete in 2003. Initiatives to set standards for the administration and delivery of special education programs and services were announced in January 2000 and were planned for completion by the end of 2002.

Managing the scale and pace of these changes has been a significant challenge for the Ministry and school boards.

DETAILED AUDIT OBSERVATIONS

INDIVIDUAL EDUCATION PLANS

Regulation 181/98 requires that, within 30 school days of a student's placement in a special education program as determined by an IPRC, an Individual Education Plan (IEP) be prepared for the student. For students returning to a special education program in September, IEPs must be prepared within 30 school days of the start of the school year.

IEPs must be discussed with and signed by parents/guardians and, where the student is 16 years of age or older, by the student. Principals also sign IEPs, as under regulation they are responsible for the quality and implementation of IEPs.

IEPs are critical documents in that they are to specify learning expectations for the student, as well as any accommodations necessary to enable the achievement of those expectations. The learning expectations for most students are based on the regular provincial curriculum but are drawn from lower grade levels than those of the students' age peers or, for gifted students, are extended. Some students work on an entirely alternative curriculum, such as an alternative life-skills curriculum.

Compliance with Guidelines and Standards

The Ministry issued guidelines for good practice in developing IEPs in 1998 to help boards comply with the *Education Act* and regulations. In 2000, it issued standards to provide policy direction for boards' development of IEPs. The boards that we visited advised us that they intended to be in compliance with the standards for the 2001/02 school year.

In our review of the IEPs prepared in 2000 for the students in our sample, we noted a number of instances in which the IEPs did not meet the 1998 good-practice guidelines, including the following:

- The amounts and types of supports/services to be provided to the student were not stated. We were told that schools did not want to promise more than they could deliver due to the risk of legal action by parents if boards lacked the resources to fully provide the stated services and supports.
- Learning expectations were often vague and not measurable. Clear expectations are needed to help focus the efforts of the teacher, student, and parent and to facilitate objective assessment of actual progress against planned progress.
- The dates that expectations were updated were not stated in the IEPs. This information would assist parents and school personnel who dealt with a student for the first time to gain an understanding of the student's rate of progress over several terms.
- Accommodations required to help the student achieve the established expectations were not specific. For example, a common accommodation was "extra time to complete assignments," with no indication of how much extra time was appropriate, given past experience with the student, or had previously been given. Specificity is particularly important to facilitate reliable and fair assessment of student performance, such as in examination writing and provincial testing.

- Instructional strategies and materials that worked particularly well were not noted.
- Other useful information suggested in the Ministry's guidelines was missing, such as a summary of the relevant health information in the student's file, the grade level the student was currently performing at, and the names of the school personnel who were involved in developing the IEP.

We also noted that only 17% of the IEPs in our sample were completed within 30 school days of the start of the school year as required by regulation. Principals and special education teachers told us that preparing a good-quality IEP for every student within the 30-day period was not realistic, particularly in the case of students attending a school for the first time.

However, if IEPs are not done in a timely fashion, their effectiveness is greatly reduced. Valuable time may be lost over the first few months of each year while a new teacher gains familiarity with the student's abilities and learning style. It may be better for the student if at least portions of each IEP for the first term of a school year were prepared during the preceding May/June period. Much of the profile and progress information needed for the IEP is gathered at that time in preparation for the annual meeting at which students' placements are reviewed. Teachers receiving students in September could complete or modify the IEPs after the end of the first term or earlier, as appropriate. Alternatively, boards should at least ensure that teachers review the profile and progress information on file very early in the school year.

Given the many deficiencies in the IEPs we reviewed, it is important to have procedures to ensure that the new standards are followed. This could involve establishing a compliance-verification process and providing boards with examples of good IEPs for different types of exceptionalities. At two of the schools we visited, we noted one result of not having such procedures in place: IEPs had not been prepared for some time, and only when new principals were assigned to the schools was this detected. Despite intense efforts to complete the IEPs, there were still many exceptional students without IEPs at both schools at the time of our visits.

The Ministry advised us that in July 2001, it conducted a review of a sample of IEPs from a random sample of one-third of the province's school boards. The purpose of the review was to assess compliance with the new standards and to provide boards with appropriate feedback.

Recommendation

To help ensure that the services students need to make satisfactory progress are timely and appropriate and that school boards comply with legislation, regulations, and policies, the Ministry should:

- **use the results of their planned compliance-verification work to provide boards with examples of successful practices for timely and effective preparation of Individual Education Plans; and**
- **require school boards to establish compliance-monitoring procedures and report the results of their work.**

Ministry Response

Through the already established cycle of Individual Education Plan review and audit, we will identify best practices as these relate to Individual Education

Plans. We will assess and introduce appropriate compliance and monitoring procedures.

Supporting Service Decisions

In the student files we examined, it was often difficult to determine the rationale for the service decisions that formed the basis of students' IEPs. There were no summaries of the information and discussions underlying those decisions. For example, we could not determine from the files:

- how the rate of the student's progress in the current year compared to that of prior years and to that of age peers (in other words, is the student falling further behind, catching up, or staying about the same?); and
- the basic strategy to be employed (for example, to what extent should the school's and the student's efforts be focused on improving on relative weaknesses versus building on relative strengths?).

All of the boards we visited were experiencing significant turnovers of teachers, special education teachers, and principals, which increased the risk of delays or errors in meeting students' needs. Including the reasons behind service decisions in student files would help ensure continuity and effectiveness of service delivery. In addition, this information would help parents to assess the adequacy of the services and supports provided to their children.

Such information, together with the information required by ministry standards, would also enable educators to provide an analysis of and explanation for differences from planned progress. The analysis would, in turn, provide a basis for quality reviews of the appropriateness of the student's placement and of the services and supports provided. There could be several reasons why a student fails to progress that involve non-school factors in the student's life, problems with the school's service delivery, or both. Requiring schools to document reasons why expectations were not achieved would assist parents and educators to determine the appropriate corrective action to be taken and by whom it should be taken.

Recommendation

To help ensure that educators have the information they need to determine how to best meet the needs of students and to help parents assess the adequacy of services and supports, the Ministry should require boards to summarize the rationale for key service decisions in Individual Education Plans and provide explanations for cases in which planned progress has not been achieved.

Ministry Response

We agree and, through the recently introduced standards for Individual Education Plans, we require and will monitor that individual student strengths and needs, as well as educational goals, are the basis for planned interventions. We will also monitor the implementation of the standards, which

require ongoing evaluation of the strategies through the regular student reporting cycle.

Reporting on Student Progress

We noted that some teachers, in evaluating student achievement of the learning expectations of a modified curriculum, were using the provincial report-card form. That form, however, is geared to the expectations of the regular provincial curriculum, and so its usefulness in evaluating students working on modified curricula may be limited. Modifying the IEP form to include reporting whether or not each modified learning expectation was achieved would be one way to provide parents with a clearer picture of how their children are performing. One school we visited did this.

Recommendation

To help ensure that all parents are provided with clear reports on their children's progress, the Ministry should provide boards with examples of good practice in reporting the progress of students working towards modified learning expectations.

Ministry Response

The Ministry will identify good practices and share them.

PROGRAM QUALITY STANDARDS AND ASSURANCE

Having good-quality IEPs is important but does not guarantee the quality of programs and services provided. It is also important to have assurance that the services are delivered in accordance with the IEP and that IEPs are developed for all students who require one at the earliest opportunity. However, neither the boards we visited nor the Ministry had procedures in place to provide assurance that each of the 4,800 schools in the province was delivering appropriate special education programs and services.

Instead, it is up to parents to advocate for their child when they feel their child is not getting the assistance he or she requires. However, the ability of parents to advocate for their child is variable depending on how well informed they are about available services and supports.

Regulation 181/98 requires principals to consult with parents in developing IEPs. However, the extent of parental involvement and the quality of service generally depend heavily on the principal's approach to service delivery. Some parents we interviewed were very well informed about and involved in the decision-making process for their child, either because they chose to be or because they were encouraged to be. Others were less informed and involved and were simply asked to sign the IEP as evidence that it had been discussed with them. Some of these parents complained that their involvement and input was simply tolerated rather than encouraged.

Delivering the IEP

The Ministry's 1998 IEP guidelines suggest, and both the *Education Act* and the September 2000 IEP standards require, that IEPs specify the resources or supports a student needs to meet expectations. As stated earlier, this requirement had not been met in the files we examined, partly because educators were concerned that they might not be able to provide a specified level of support. At the schools we visited, principals allocated the resources they were given based on their own judgment and that of their staff regarding the relative need of each student with special needs. They also noted that resource allocation was influenced by persistent advocacy by parents and not just by assessed needs.

Ministry personnel and educators made the point that it is difficult to determine how much service to provide to students with special needs, since there is always something more that could be done. Consequently, there is a need for guidelines that would assist educators in making such judgments and thereby reduce the risk that the allocation of finite resources is influenced more by advocacy than by relative need. The Ministry currently has a project underway to develop standards for the delivery of special education programs and services. Drafts for five exceptionalities were to be published in the summer of 2001 and drafts for five more are to be published by December. Drafts for two remaining exceptionalities are planned for completion by December 2002.

The Ministry advised us that the standards will provide guidance on the attributes of quality programs but that they will not provide guidance to educators regarding how they should determine the level of service to be provided in individual cases. The Ministry's position is that the amount and type of resources to allocate to each student with special needs is a matter of professional judgment by educators, in consultation with parents and based on identified strengths and needs of students and the resources available.

Early Identification of Student Needs

Research has shown that early identification of and support for students with learning difficulties can significantly improve their educational achievement and outcomes. For some students, effective early intervention may also reduce or eliminate their need for special education programs and services later.

For several years, the Ministry has required school boards to have procedures in place to identify and respond to students' learning needs in their early years. However, neither the Ministry nor the boards we visited had established procedures to determine whether the identification and intervention processes in place in each school were timely and effective.

The need to monitor the implementation of those processes at the school level can be illustrated by one file we examined. The file indicated that learning difficulties had been identified in the early years of elementary school, both by school personnel and an outside professional, yet no formal assessment or IEP was done until the student was in high school.

In recent years, the Ministry has provided additional funding to school boards and to provincial associations for specific exceptionalities to help support and improve early intervention. The school boards we visited had all established early intervention procedures in recent years.

Although procedures varied somewhat among the school boards we visited, the process for identifying student needs can be broadly described as follows:

- As soon as a teacher determines that a student is falling behind his or her peers, the teacher is expected to implement strategies to help that student.
- If the teacher's efforts are not successful, the student is referred to a special education resource teacher, sometimes as part of a school-based team, who develops a more formal intervention strategy, based on observation and, often, the results of specialized tests.
- If the student continues to fall behind, the school principal, after obtaining parental consent, refers the student to the school board's professional support staff, who perform a detailed assessment of the student to accurately determine his or her strengths and weaknesses and to assist the principal in deciding whether the student should be referred to an Identification, Placement and Review Committee (IPRC). IPCCs:
 - determine whether a student is exceptional and, if so, what his or her exceptionailities are;
 - identify the student's strengths and weaknesses; and
 - recommend the placement that the IPCP believes will best meet the student's needs.

We were told by educators that at the time students are formally identified by IPCCs, they are typically one to two years behind their peers academically.

One indicator of the effectiveness of each school board and school's early identification and intervention initiatives is the trend in provincial assessment results. For example, provincial assessment data published in October 2000 indicate that over one-third of grade 3 students are not meeting provincial curriculum expectations at the provincial standard (38% in reading, 37% in writing, and 34% in mathematics). Effective intervention should, over time, help to increase the proportion of students who meet curriculum expectations. Improvement targets could be established at the school board and the provincial level to track progress and performance among schools and boards.

However, this summary information is not sufficient to determine whether all students who should be receiving extra support are receiving it at the earliest opportunity. Nor does it provide the data necessary to develop improvement plans. School boards also need to track more detailed information about the timing, nature, and status of intervention efforts for students who are not meeting expectations.

Ideally, a school board's student information system could be used to capture and monitor the needed information and to follow up in a comprehensive and timely way on any problems noted. However, none of the boards we visited had the capability to do so. It is also important for school boards to establish quality-assurance procedures that would include examining a sample of student files for those not meeting provincial expectations to determine whether:

- the students had received any early intervention support or should have been referred to an IPCP and/or had an IEP prepared for them; and
- the time intervals between the first detection of a problem and each key step in the intervention process, through to either a return to regular curriculum expectations or the preparation of an IEP, were reasonable.

Recommendation

To help ensure that students receive timely and effective programs and services in accordance with ministry program standards and expectations, the Ministry should:

- require and assist boards to implement quality-assurance information systems and procedures for their special education and early intervention programs and services; and
- periodically assess whether the systems and procedures established by boards are working as intended.

Ministry Response

We will review the standards for school boards' special education plans in collaboration with our education partners to determine how boards can establish adequate systems to collect, respond to, and report on quality-assurance information.

Tracking Student Achievement and Outcomes

As stated earlier, we found that student files lacked clear, measurable expectations for the student against which to assess actual progress. Without information on individual student progress, boards could not prepare summary information about numbers of students with special needs who did not meet, who met, and who exceeded, the individual expectations set for them. Such information, compared year over year, would help trustees determine whether the program as a whole, as well as aspects of the program devoted to specific categories of exceptionality and need, were improving, stable, or deteriorating. Measuring and tracking amounts of progress would also assist management and trustees in assessing the relative effectiveness of alternative service-delivery models and in identifying training needs for school personnel.

Provincial assessments conducted each year by the Education Quality and Accountability Office (EQAO) provide objective information about student achievement relative to the provincial curriculum. However, according to the EQAO's most recent provincial assessment report from October 2000, the proportion of students exempted from all or some subject testing has been rising since the tests were introduced. Some boards exempt as many as 14% of their students from the assessment, as compared to one of the boards we visited that exempted only 1%. Possible reasons for exemptions include significant special needs, insufficient language comprehension, parental request, or principal discretion. However, the EQAO does not capture and summarize the reasons for exemptions. A student's participation in provincial assessments may also be deferred by the principal, but the extent to which this occurs is not known or controlled.

With better information on the numbers and appropriateness of exemptions and deferrals associated with special needs, trustees and the Ministry would be better able to assess whether positive trends in year-to-year results could be linked to genuine improvements or to a narrowing of the student base being tested.

Efforts to control exemptions and deferrals for students with special needs would make provincial assessment a better indicator of progress being made by those students. As a result, provincial assessment data could also be used to determine whether the school improvement plans the EQAO requires school boards to prepare should include initiatives to improve special education programs and services provided.

Outcome information on students' post-school education and employment success would similarly assist school boards and the Ministry in assessing the effectiveness of the special education programs and services at both the school board and the provincial level. Linking such outcome information to the special education programs and services students received would help to determine the factors and practices that contributed to the outcomes achieved and highlight areas for further study.

Recommendation

To help ensure that the Ministry and school boards can evaluate the effectiveness of special education programs and services, the Ministry should:

- **require school boards to summarize the progress made by students with special needs relative to planned expectations and to report board-wide results on the extent to which expectations were met;**
- **establish procedures to collect information on the post-school outcomes of students with special needs and report this information at both the school board and the provincial level.**

Ministry Response

We will review data collection requirements relative to program and student outcomes.

Provision of Professional Services

The boards we visited all had backlogs for professional services such as psycho-educational and speech-language assessments. The backlogged cases were prioritized by professional and school personnel to ensure that the most serious cases were dealt with first. As a result, less serious cases had to wait a considerable amount of time, commonly six to 12 months, for service. Some cases, particularly reassessments, were assigned such a low priority that they were not even included in the backlog, as there was too little likelihood of their receiving service.

Professional staff we interviewed stated that the need for service is a continuum ranging from those with very mild needs to the very needy. However, service decisions are being made based on budgetary considerations, and there is no basis for either school boards or the Ministry to evaluate the appropriateness of the service cut-off points currently in place.

Another concern with respect to speech and language services is the co-ordination of activities between the Ministry of Education and the Ministry of Health and Long-Term Care. Since speech pathology (treatment) is considered to be a medical service, it is the responsibility of the

Ministry of Health and Long-Term Care to provide it. The Ministry of Education set out school-board responsibilities in areas of shared responsibility with the Ministry of Health and Long-Term Care in Policy/Program Memorandum No. 81 (PPM 81), which was issued in 1984 and is still in effect. In 1988, Interministerial Guidelines for the Provision of Speech and Language Services were issued to elaborate on and clarify PPM 81. PPM 81 and the subsequent guidelines indicate that speech and language pathologists (SLPs) employed by school boards are responsible for assessing needs and for providing services for students with communication disorders where such services are an appropriate part of the students' educational programs.

An interministerial task group, consisting of representatives from the ministries of Education, Health and Long-Term Care, and Community and Social Services, reviewed areas of shared responsibility during 2000. The task group noted that the potential for ambiguity in the interpretation of these guidelines meant that the current policy was working only in a few jurisdictions, where the respective partners treated the guidelines as policy, communicated well among themselves to ensure that their respective responsibilities were clear, and provided levels of service consistent with the needs of their school-aged populations.

The task group also found that significant provincial discrepancies in the accessibility of services was creating an inequitable situation depending upon the jurisdiction in which a family was living. Some boards provide only assessment services, as outlined in PPM 81, while others, such as two of the boards in our sample, provide some language and/or speech-therapy service in accordance with the 1988 guidelines.

The SLPs we interviewed also felt that most services should be delivered by one organization and that school boards were in a better position than Community Care Access Centres, funded by the Ministry of Health and Long-Term Care, to co-ordinate the services with students' education programs.

Recommendation

To help ensure that students with special needs have available to them, in accordance with the *Education Act* and regulations, appropriate professional services regardless of the area of the province in which they reside, the Ministry should:

- **require that boards collect and report complete service-backlog information; and**
- **resolve the co-ordination of services issue with the Ministry of Health and Long-Term Care.**

Ministry Response

We agree that information about the levels of service available to students is important for planning. The Standards for School Boards' Special Education Plans require that information about service levels be reported.

The Ministry is working with other ministries, agencies, community and education partners, and parents to develop service co-ordination models.

MANAGING PLACEMENT AND CLASS COMPOSITION

Once a student has been identified as exceptional, the next step in the service-delivery process is placement. The Ministry requires that boards maintain a range of placements, and IPRCs select the placement that best meets the student's needs and the parents' wishes. The options are:

- placement in a regular class (with support);
- placement in a regular class with withdrawal support (partial withdrawal to a specialized class delivered by a qualified special education teacher);
- placement in a special education class with partial integration in regular classes; or
- placement in a special education class for the entire school day.

Support for Classroom Teachers

The Ministry's policy is that the first choice for placement should be integration in a regular classroom with accommodations and supports, where such placement meets the students' needs and is in accordance with parental wishes. According to the fall 2000 enrolment reports school boards provided to the Ministry, almost 80% of students with special needs were being educated in regular classrooms for at least part of the day.

Integrated classes often have students working on alternative and modified curricula, where the nature and extent of modification varies with the student. Teachers must therefore prepare and deliver separate lessons for each student.

A concern frequently expressed by teachers we interviewed was that the size of integrated classes was negatively impacting the academic achievement of all students. Several of the schools we visited had one or more classes of 25 to 30 students, 30% of whom had IEPs. One school visited had 11 IEP'd students in a grade 3 class of 30 and 13 IEP'd students in a grade 2 class of 30. Teachers in such classes require substantial support to be able to effectively serve so many students with such a wide range of needs.

None of the boards we visited could provide the information necessary to determine how pervasive and serious the problem was. However, the extent of support available to classroom teachers was generally inadequate in the opinion of the many principals and teachers we interviewed, with the result that many of their students did not receive the support they required.

Most teachers were also concerned about the impact of interruptions by students with behavioural problems on the learning environment for other students. One teacher described a situation where much of a recent class had been lost due to a behaviour problem. Some teachers recommended establishing additional specialized behaviour classes as a solution. The concerns expressed to us were similar to the findings of a 1996 survey of teachers in British Columbia. According to that survey, classroom teachers were concerned about the placement of exceptional students in regular classrooms without adequate support, which reduced the time available for other students, and the impact of disruptive behaviour on the learning environment.

As stated earlier, the rationale for decisions and recommendations made by IPRCs needs to be made clearer so that parents and educators understand the practical strategies and supports that,

in a given situation, an IPRC considered were needed to minimize disruptions and provide all students with the help they needed to progress.

A number of factors that have contributed to the lack of available support educators indicated to be a problem in certain integrated classes are described in the following two subsections.

SPECIAL EDUCATION RESOURCE TEACHERS

Because of recent turnover, there are fewer experienced special education resource teachers available to assist classroom teachers to prepare IEPs and to provide direct assistance to students with special needs. Those resource teachers we interviewed said that their time was being increasingly consumed by paperwork rather than service delivery. In particular, they were concerned with the time involved in making annual claims to the Ministry for special education grants in respect of students with high needs. We were advised by principals and special education resource teachers that they spent several hours on each claim producing required supporting documentation. Given that the needs of most of these students remain high for several years, if not permanently, staff felt that submitting claims annually for them was a poor use of resources. We understand that the Ministry plans to introduce changes that will reduce the frequency of claim submissions for such students and therefore the time and paperwork required of school-board staff.

TEACHER ASSISTANTS

Many principals, teachers, and parents were concerned about a lack of teacher assistants to help teachers provide their students with special needs with the support they require. One of the more common concerns expressed to us by parents was that their child's rate of progress was deteriorating due to a reduction in the amount of a teacher assistant's time he or she received. Data provided to the Ministry by school boards suggest that needs cannot be met with the existing numbers of teacher assistants. In particular, there were about 14,000 teacher assistants employed by Ontario school boards in October 2000. However, there were at least 25,000 students with high needs identified by school boards, the majority of whom required teacher assistant support for at least part of the day. Some required a dedicated assistant. Clearly, if much of the available teacher assistant time was needed to effectively support students with high needs, there was insufficient time available to provide needed support to the thousands of other students who required additional help to progress.

Another concern expressed by educators we interviewed was that teacher assistants are hourly contract staff and are generally available only while the students are in class. Therefore, there is very little time available for them to meet with the teacher and other support staff to properly plan how best to provide the support their students require. Also, because they are contract staff, teacher assistants are more vulnerable to job loss when school boards allocate resources to other priorities. This affects the continuity of service delivery that is often important to ensuring that students progress and is a major reason for the apparent shortage of teacher assistants province-wide.

Withdrawal Classes

While a regulation limits the size of self-contained special education classes, there are no restrictions on the size or composition of classes established to provide withdrawal support.

Teachers of such withdrawal classes we interviewed expressed concerns that the academic achievement of exceptional students was being negatively affected by an increase in the size of their classes, as well as a broadening of the range of exceptionality types, ages, and maturity levels in each class.

The boards we visited did not track class composition information in relation to the support resources available in order to determine how pervasive this issue was. They also did not have the outcome information required to measure the impact of aspects of class composition on academic achievement.

Recommendation

To help support resource allocation decisions and assist trustees and the Ministry to monitor the classroom support available to teachers and students, the Ministry should:

- require that boards collect and report information on class composition and the support resources available for each school; and
- analyze the information to determine how pervasive support or composition problems are and take corrective action where necessary.

Ministry Response

The Ministry will work with school boards to determine the means or mechanisms by which data can be collected and analyzed in order to support school board and Ministry resource allocation decisions.

PLANNING AND OVERSIGHT OF PROGRAMS AND SERVICES

Each school board must submit its special education plan to the Ministry every two years, as well as submit changes to the plan annually. Ministry district offices review the plans. The Ministry considered the results of its review of the 1999 plans in developing standards for special education plans, which it issued in September 2000. The standards require that each special education plan specify: the board's range of placements for students with special needs; strategies for placing students with special needs in a regular classroom; strategies for early identification and intervention; staff resources; processes involved in arriving at service decisions for each student; and processes for preparing and implementing Individual Education Plans for students. The plans due in July 2001 will be reviewed for compliance with these standards, and school boards must make them publicly available.

Ministry standards also require that, at every school board, a Special Education Advisory Committee (SEAC) participate in the school board's annual review of its special education plan. A SEAC may have up to 12 members from local parent associations, up to three trustees, and, in certain circumstances, one or two Native representatives. In addition, a board may also appoint one or more community members who are not trustees and not local-association representatives.

In connection with its participation in the annual review, a SEAC is expected to examine and comment on the plan. The SEAC's other responsibilities are:

- participating in its school board's annual budget process and reviewing the financial statements of the board with respect to special education;
- making recommendations to its school board on any matter affecting the establishment, development, and delivery of special education programs and services; and
- providing, on request, information to parents.

The Ministry's standards constitute an important step in improving the quality, consistency, and accessibility of special education plans and will help the Ministry to determine whether school boards are offering a range of programs and services to meet student needs. However, compliance with the standards will not ensure effective oversight and management accountability for service delivery for two reasons.

First, the standards do not require plans to include measurable goals or targets for improving programs and services and, ultimately, achievement levels for students with special needs. The focus is more on what is being done rather than on what is to be achieved.

Second, the standards do not require a discussion and analysis of trends resulting from changes in the population of students with special needs and personnel serving them. Information that would be useful for assessing the adequacy and quality of service delivery and for establishing future goals would include:

- summary data on the size, composition, and placement of the population of students with special needs;
- caseload statistics for professional services such as those provided by psychologists, speech and language pathologists, therapists, and social workers (this information would complement the new standards' requirement that boards disclose average waiting times for the various professional assessments and the criteria for managing waiting lists); and
- an analysis of special education training requirements and the availability of personnel with sufficient special education training or experience in key roles such as principals, special education teachers, and special education resource teachers.

Also, school boards need to have cost-effective systems and procedures for obtaining and reporting the above information so that it is timely and reliable for decision-making and for effective oversight. None of the boards we visited had the systems and procedures in place to provide such information, and substantial effort would have been required to produce it. For example, the SEAC of one of the boards we visited had requested waiting-list information from its board staff—the information had to be obtained from a special survey of schools, and the results were incomplete.

Recommendation

To help ensure that school-board special education programs and services are effective and to enable the Ministry to obtain assurance of that effectiveness, the Ministry should improve its standards for special education plans to include the requirements that:

- trustees, with the advice of Special Education Advisory Committees, establish service-delivery objectives for management;
- management report annually on the extent to which service-delivery objectives have been achieved and on any necessary corrective action; and
- boards have systems and procedures to ensure the accuracy and completeness of the information presented in the plans and management reports.

Ministry Response

We agree, and, in future reviews of the standards for school boards' special education plans, the Ministry will work with its education partners to determine a mechanism by which service-delivery objectives for management might be included in special education plans and monitored.

TEACHER PREPAREDNESS

Pre-service Education

Given that the Ministry expects students with special needs to be educated in the regular classroom whenever possible, all teachers need a strong foundation in special education service delivery. Nevertheless, at the time of our audit, efforts to ensure that all teachers had this strong foundation were not sufficient, although a number of significant reform initiatives were underway.

Many educators we interviewed, including newer teachers, were concerned that new teachers are not well prepared to educate students with special needs. With the high rate of teacher retirements in recent years, fewer experienced teachers are available to meet students' needs and to act as mentors to the many new teachers entering the system. This high rate of turnover is expected to continue for several more years. According to the Ontario College of Teachers, by 2005 about 50,000, or 40%, of Ontario's full-time teachers will have five years' experience or less.

There is therefore an urgent need to ensure that the many new teachers graduating from university faculties of education are sufficiently prepared to deliver special education programs and services. In 1997, the College of Teachers began a pilot program for accrediting the province's 10 university faculties of education to better ensure quality and consistency in the skills and knowledge their graduates acquire. One conclusion of the pilot program, which was completed in 2000, was that special education was among the top priorities for improvement in pre-service teacher education. It was found during the pilot program that university programs varied widely in terms of both course content and the amount and quality of in-classroom experience with students with special needs provided. The College plans to make the accreditation program mandatory and extend it to in-service teacher-training courses once the necessary regulation has been passed.

The amount and nature of practical classroom experience that Ontario student teachers are required to have prior to graduation was less than that required in many other jurisdictions. Ontario student teachers have typically received eight to 11 weeks of practical classroom experience and may not be exposed to the full range of teaching responsibilities, including IEP preparation, curriculum modification, and student assessment.

In June 2001, the Ministry announced its plans to improve teacher quality and teaching excellence. The plans include testing of new graduates; mandatory ongoing professional development and re-certification in seven core areas, including special education; an internship program; and new performance-appraisal standards and procedures. We also understand that a proposed regulation will require that student teachers receive 12 weeks of practical classroom experience and that faculties of education have recently adopted this requirement in anticipation of the regulation being passed.

Special Education Resource Materials

Resource materials can help teachers and teacher assistants to provide service for students with special needs. Both teachers and teacher assistants advised us that they obtain needed information by researching a variety of Web sites and published materials. However, there is no centralized, Web-based facility that provides educators with ready access or links to current research and training materials.

Useful resources that all educators would benefit from having ready access to include: articles from journals and periodicals about the unique aspects of specific exceptionalities; successful teaching strategies; evaluations of new technology and specialized equipment together with instructions or training materials for using them; sources of useful modified curriculum materials; and tapes of recent workshops and seminars.

Having a Web-based reference facility would be one way to reduce the time and effort educators must spend in locating useful material and to increase the likelihood that such material will be used to benefit students.

Also, some students with intellectual disabilities work at levels that are significantly below those of their age peers. Elementary teachers whom we interviewed were concerned about the lack of age-appropriate reading and other materials for these students. They also questioned whether, given their other duties, it should be left up to teachers to locate and acquire materials on their own.

In our view, it would be more cost effective for the Ministry, rather than for schools and individual teachers across the province, to research and acquire or develop appropriate learning materials for students working on significantly modified curricula.

Recommendation

To help ensure that teachers are well prepared to meet the needs of students with special needs, the Ministry should:

- work with applicable stakeholders to review the pre-service practical experience and special education course content requirements for certifying teachers and ensure that they reflect best practices in preparing teachers for their responsibilities; and
- investigate the feasibility of providing a cost-effective, Web-based reference facility for educators and of acquiring or developing age-appropriate instructional materials.

Ministry Response

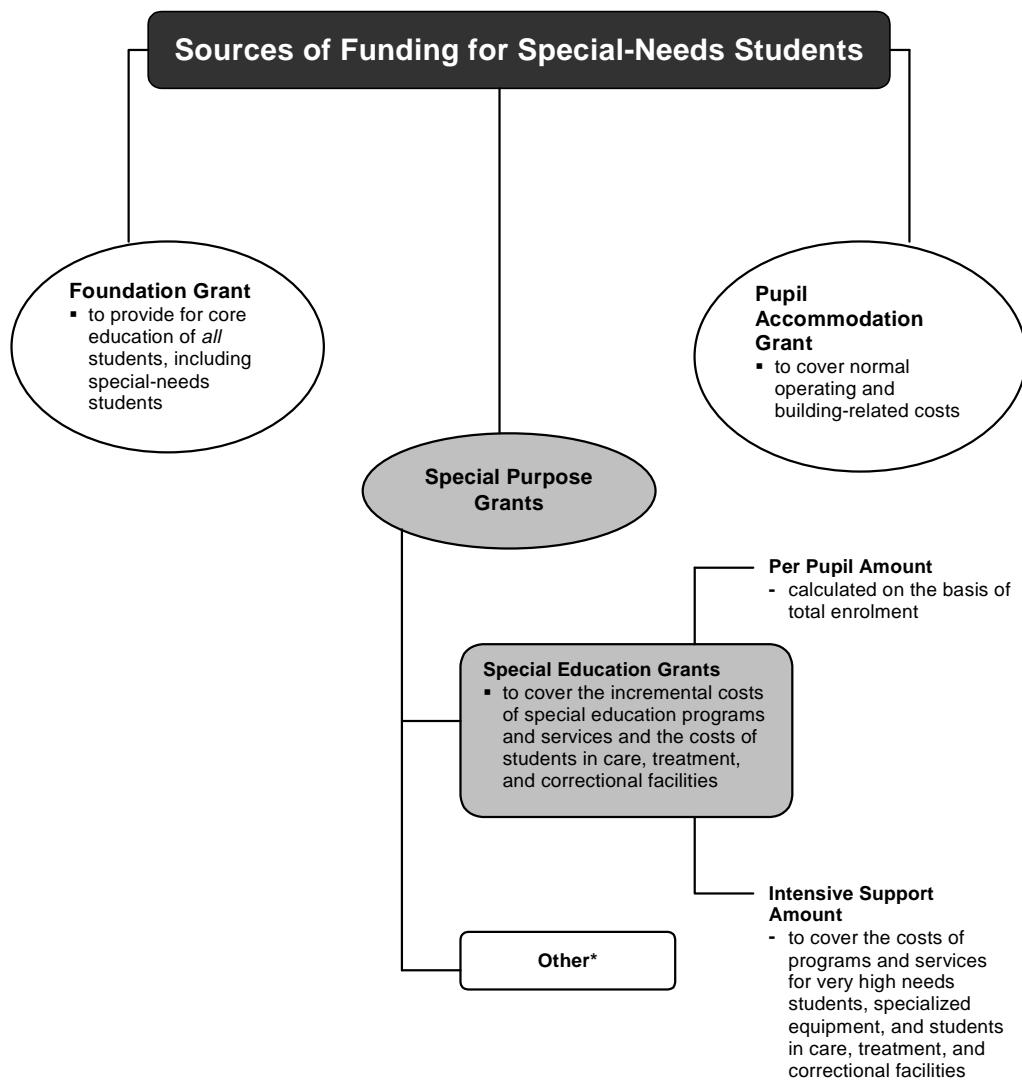
The Ministry is working with the teachers' regulatory body and postsecondary institutions to ensure that teachers' pre-service and mandatory professional learning will meet the service needs of special education.

The Ministry is supportive of providing educators with greater access to a Web-based reference facility.

FUNDING FOR SPECIAL EDUCATION

The Funding Formula

The current funding formula for special education was implemented by the Ministry for the school-board 1998/99 fiscal year (September–August). Its structure is set out in the following figure.



* Eight other grants, such as the transportation grant, that recognize the different circumstances faced by students and school boards.

Source of data: Ministry of Education

As the figure illustrates, special education grants are designed to provide funding for the incremental costs of delivering special education programs and services. Other costs, such as those for classroom teachers, heating, and lighting, are to be covered through the basic grants that school boards receive for all students, including those with special needs.

The Ministry has directed that special education grants, up to the level of funding provided in the 2000/01 school year, be spent only on special education programs and services—the grants may not be used for other expenditures. If a board's incremental special education expenditures in a given year are less than the grants, the balance has to be placed in a reserve for future special education expenditures. However, any increases in special education funding for the 2001/02 school year will not have to be spent on special education programs and services.

The grants for the last three school-board fiscal years are set out in the following table.

**Special Education Grants to School Boards,
Actual and Revised Estimates, 1998/99–2000/01**

Type of Grant	Fiscal Year		
	2000/01 (Revised Estimates) (\$ millions)	1999/2000 (Revised Estimates) (\$ millions)	1998/99 (Actual) (\$ millions)
per-pupil amount (based on overall enrolment)	724	621	589
intensive support amount based on claims for eligible pupils			
▪ amount for programs and services for very high needs students	568	516	516
▪ amount for specialized equipment	3	3	4
total grants for special education programs and services	1,295	1,140	1,109
grants for students in care, treatment, and correctional facilities	66	65	62
Total special education grants	1,361	1,205	1,171

Source of data: Ministry of Education

The per-pupil amount and the amount for specialized equipment are relatively simple for the Ministry to administer. However, it is a much more complex task to determine which students are eligible for the intensive support amount (ISA), which is intended to recognize differences among boards in the incidence of students with high needs. Since the claims process was introduced for the 1998/99 school year, there have been a number of concerns about the clarity and appropriateness of the eligibility criteria and the administrative effort required to prepare and validate claims. Consequently, the Ministry is still reviewing and refining the process. The Ministry's review is to be completed in 2003.

In the interim, in order to provide funding stability, one funding procedure was followed in the 1999/2000 school year, and another is to apply from the 2000/01 school year until the completion of the review. In 1999/2000, a "test year" according to the Ministry, each board's funding was held stable at its 1998/99 level. From 2000/01 until the completion of the review, each board will receive whichever one of the following amounts is higher: its 1998/99 level of funding or the highest amount it is entitled to based on validated ISA claims for each school year from 1998/99 onwards.

Insofar as 1998/99 actual school-board expenditures are involved in determining grants in the years during the interim period, any inequities in the levels of spending, and therefore of funding, among boards in 1998/99 will continue until the improved ISA process is implemented.

The following table shows the level of incremental spending and funding per student with special needs, both for the school boards visited and for the province as a whole, in the 1999/2000 school year (the most recent year for which data were available).

**Special Education Incremental Expenditures and Grants
Per Student with Special Needs, 1999/2000**

	Board A	Board B	Board C	Board D	Province
special education incremental expenditures	\$4,740	\$4,370	\$4,030	\$3,560	\$4,630
special education grants	\$4,480	\$3,770	\$3,370	\$3,090	\$4,270
number of students with special needs	9,814	14,585	1,130	3,737	267,304
incidence rate (proportion of total enrolment)	12.3%	13.6%	14.0%	15.5%	12.5%

Source of data: Ministry of Education and OPA calculations

As the table shows, there was a significant difference in the level of spending and funding per student with special needs among the boards visited. For example, board A received \$1,390, or 45%, more funding per student than Board D. Such a difference can be partly justified by differences among boards in the incidence of students with special needs and the relative needs of those students. However, some of the difference is also due to the fact that funding in the 1999/2000 fiscal year was held stable at the 1998/99 level. We understand that, in the 2000/01 school year, Board D and 41 other boards received some additional funding based on their validated ISA claims, which reduced the inequity that existed in 1999/2000.

Spending differences are also reflected in the levels of resources available to serve students with special needs among the boards we visited, as the table below indicates.

Number of Special-Needs Students Per Available Staff Member, 1999/2000

	Board A	Board B	Board C	Board D
psychologists and psychological consultants	446	356	807	747
speech-language pathologists	446	521	1,130	747
social workers	446	512	none	747
special education teachers	20	23	32	37
educational assistants	18	26	32	19

Note: Available staff members may include contract and temporary staff as well as employed staff.

Source of data: School boards visited

However, without sufficient data, as mentioned earlier in the report, we could not determine the extent to which differences in resources represented differences in the range of needs in each board's population of students with special needs and/or differences in the level or method of service delivery.

Ministry Analysis of Reported Board Expenditures

Boards report special education expenditures in schedules included in the annual financial-reporting package that they submit to the Ministry. However, the Ministry does not analyze the information it collects from boards and determine the reason for inconsistencies in the year-over-year expenditures within a board and in the relative expenditures across all boards. An example

of such an inconsistency shown in the table below is that reported special education expenditures at the boards we visited were significantly higher (by over 15% at three of the boards) than special education grants. For the province as a whole, incremental expenditures were over \$95 million higher than special education grants.

Total Special Education Incremental Expenditures and Grants, 1999/2000

	Board A	Board B	Board C	Board D	Province
reported special education incremental expenditures (\$ 000s)	46,490	63,737	4,548	13,296	1,237,409
special education grants (\$ 000s)	43,942	55,037	3,813	11,556	1,142,365*
above-grants expenditure (\$ 000s)	2,548	8,700	735	1,740	95,044
% above grants	5.8	15.8	19.3	15.1	8.3

* This amount reflects the data in annual financial-reporting packages submitted by boards to the Ministry. It differs from the amount that appears in the "Special Education Grants to School Boards" table, which reflects certain funding adjustments made by the Ministry.

Source of data: Ministry of Education and OPA calculations

Questions arising from this discrepancy that the Ministry did not investigate include:

- What was the impact on the programs from which the \$95 million was re-allocated? Had the Ministry been overfunding those programs by \$95 million, or, instead, were the students served by those programs disadvantaged in some way as a result of the re-allocation?
- Was the \$95 million above-grant expenditure due to poor spending decisions by the boards and/or uneconomic special education service delivery, or does it indicate an inadequate level of funding for special education? If the former, can the Ministry provide examples of ways to make spending and service delivery more cost effective?

The boards we visited stated that they funded their special education overspending using the unrestricted learning opportunities grant provided by the Ministry.

In order for the Ministry to reach appropriate conclusions from analyses of reported information, the information must be reliable. However, the Ministry does not obtain assurance that the information that boards report is accurate, complete, and prepared in a consistent manner such that one board's results may be compared to another's. The Ministry needs assurance, for example, that differences in per-student expenditures are not due to differences in the types of costs boards charge to special education or to differences in how boards identify students as having special needs. For example, we found that the relatively low above-grant expenditure by board A in the grants and expenditures table was caused by the fact that the board had reported expenditures based on erroneous estimates rather than on actual costs, due to limitations in the board's accounting system. Board A's expenditures per student with special needs as indicated in the above table were also understated because of this error.

Lack of Information on Spending by Activity

There is little information available on school-board spending by activity or program that can be related to outcomes. Consequently, important questions cannot be answered, including:

- What is the cost of student assessments performed by school-board professional support staff? How does the total cost of performing assessments vary by type of exceptionality?

Do the benefits of assessments—better IEPs that result in improved student outcomes—indicate that more, the same amount of, or less, special education funding should be allocated to these services?

- What is the cost of providing services and supports for individual students and specific categories of exceptionality? How do these costs compare to the results achieved? Where costs are high compared to results (for example, in the cases frequently cited to us of teachers and other professional staff spending a disproportionate amount of time on behaviour problems with limited results), should the Ministry take the lead in locating or developing more cost-effective delivery models?
- What is the most effective and economic mix of special education staff? Would student outcomes be improved by having more special education assistants and fewer special education teachers, or vice versa?

If the costs of special education activities are not known, management at school boards cannot effectively manage costs, and the Ministry, trustees, SEACs, and parents cannot assess how effectively management has spent special education funds. In addition, school-board management cannot reliably develop business cases to support the introduction of new technologies and service-delivery models.

Reporting the Full Cost of Special Education Programs and Services

Students with special needs require more than their proportionate share of the costs of transportation, board administration, school administration, and teaching resources. However, since those costs are covered by other grants, the special education expenditure schedules required by the Ministry do not contain the full cost of delivering special education programs and services. Consequently:

- Comparing service-delivery models and decisions among boards is less useful because information on their impact on the costs covered by other grants is not available. Thus, incorrect conclusions may be reached regarding the most cost-effective service options.
- The equity of the special education funding formula for boards in different circumstances, and therefore for students across the province, cannot be evaluated. For example, many rural and northern boards have less than 1,000 students with special needs who are spread over large geographic areas, while several urban boards have more than 5,000 students spread over comparatively small geographic areas. In our sample, board C was the smallest board, with 1,130 students with special needs spread over a wide geographic area, while boards A and B were both large urban boards. However, as the previous tables show, board C had far higher numbers of students per staff member, at the same time that it had the highest above-grants spending percentage, at 19.3%.

Recommendation

To strengthen the ability of trustees, Special Education Advisory Committees, parents, and the Ministry to hold school-board administrators accountable for spending special education funds in a cost-effective manner and to

strengthen the Ministry's ability to ensure the adequacy and equity of the special education funding formula, the Ministry should:

- require that boards report the full cost of special education by major activities and functions and establish standards to ensure that the reported information is comparable across boards;
- obtain assurance regarding the reliability of the reports; and
- analyze the reported information, determine the reasons for any significant inconsistencies in expenditures, and take action where appropriate.

Ministry Response

The Ministry will review its standards for board reporting of special education expenditures to ensure that this information is complete, reliable, and comparable across boards. The Ministry appreciates that the Provincial Auditor recognizes that this is ongoing work and part of a multi-year plan to improve the consistency, reliability, and accuracy of information reported by school boards.

APPENDIX

Status of 1994 Public Accounts Committee Recommendations to the Ministry of Education and Training Relating to Section 3.08 of our 1993 Annual Report

Recommendation	Current Status
1. The Ministry of Education and Training should ensure that it has consistent guidelines and sufficient expertise with which to review the special education plans of school boards.	▪ Implemented. Standards for special education plans were issued September 29, 2000. The results of the Ministry's review of the 1999 plans school boards prepared were considered in developing the standards. District Office staff will review the 2001 plans for compliance with the standards, but will not be critically evaluating them. We have made a further recommendation regarding special education plans.
2. The Ministry of Education and Training should establish procedures that enable it to monitor the costs and effectiveness of special education programs and services delivered by school boards and facilitate the sharing of best practices among school boards.	▪ Not implemented. We have made a further recommendation in this area.
3. The Ministry should accelerate the Education Finance Reform Project. In the meantime, the Ministry should monitor more closely the use of provincial grants by school boards.	▪ Partially implemented. Finance Reform was introduced in 1996; however, special education funding reform was not introduced until 1998 and is still being refined. ▪ Ministry monitoring of some \$68 million of special education grants to school boards for students in care, treatment, or correctional facilities and for specialized equipment has improved.

Recommendation	Current Status
4. The government should ensure full co-operation among the ministries that provide the complete range of services required by children with special needs. It should also consider reallocating the responsibility for providing these services among the ministries involved, in order to deliver special education in a more effective, integrated and cost-efficient manner.	<ul style="list-style-type: none"> ▪ Not implemented. Co-ordination of services has been a long-standing issue. ▪ We have made a further recommendation on the issue.
5. The Minister of Education and Training should implement the necessary steps to require that school boards be subject to value-for-money audits. In doing so, the Minister may wish to apply section 17 of the <i>Audit Act</i> .	<ul style="list-style-type: none"> ▪ Not implemented. ▪ However, the government did announce support for required amendments to the <i>Audit Act</i> in April 2001.
6. The Ministry of Education and Training, as a matter of policy, should ensure that all members of school boards and Special Education Advisory Committees (SEACs) are informed after their election of the role, responsibility, and best practices of SEACs.	<ul style="list-style-type: none"> ▪ Implemented. There have been several initiatives to support SEACs since our 1993 audit. The most recent was a training initiative that included SEAC members launched by the Ministry in February 2001. ▪ Regulation 464/97 addresses the requirement for boards to provide SEAC members with information on their role.
7. The Ministry of Education and Training should require that each SEAC be an active participant in the planning and monitoring of the programs and services in its school board's special education plan.	<ul style="list-style-type: none"> ▪ Implemented. ▪ Regulation 464/97 gives SEACs the right to be heard at board meetings before decisions on SEAC recommendations are made and to participate in the annual review of the special education plan, the budget, and the portions of the financial statements that relate to special education. ▪ Ministry district-office staff reviews of the plans include ensuring that each board's SEAC has reviewed the plan.
8. In order to improve communication between parents and the Identification, Placement, and Review Committee (IPRC), the Ministry of Education and Training should ensure that: <ul style="list-style-type: none"> ▪ parents have the right to an advocate during the IPCR process and they understand this right; ▪ the IPCR advise the parents before each meeting of this right; and ▪ each school board provide the parents with access to an interpreter when necessary. 	<ul style="list-style-type: none"> ▪ Implemented. Regulation 181/98 governs IPCRs and requires them to consider parent-supplied information when reaching their decisions. ▪ It also gives parents the right to have a representative present at any IPCR hearing. ▪ Parents must receive 10 days' notice of any meeting involving their child.
9. Each school board should advise parents annually of the existence of the parents' guide, and in particular point out the parents' right to refer their child to the IPCR through the principal. The parents' guide should include a description of the full range of options for their child, including options available at provincial and demonstration schools.	<ul style="list-style-type: none"> ▪ Partially implemented. Regulation 181/98 requires a board's parents' guide to be provided to families of exceptional students and available at all schools and at the Ministry's district offices. However, it does not require that they be provided to parents in advance of IPCR meetings and in many cases they were not at the schools we visited. ▪ Special education plans contain much useful information about a school board's programs and services as well as special education policies and requirements, including the parents' guide, but the plans were not readily accessible at some boards. The new standard requires school boards to make their plans publicly accessible.

Recommendation	Current Status
10. The Ministry should require that classroom and non-classroom professional experts communicate directly with each other and with parents in conducting an assessment of a pupil.	<ul style="list-style-type: none"> ▪ Partially implemented. Regulation 181/98 requires each IEP to be discussed with the parent. Boards must seek a parent's consent before conducting an assessment of a child, and assessment results must be discussed with parents. ▪ The effectiveness of communication among teachers and other professionals depends largely on the encouragement of principals and accordingly may vary from school to school. This report includes further recommendations for improving documentation in order to strengthen information sharing among educators.
11. The Ministry of Education and Training should require that each IPRC, in the course of its annual review, give parents a full report of their child's progress and reassessment.	<ul style="list-style-type: none"> ▪ In process. Many parents do not receive a full report of their child's progress because of vagueness in the IEPs and the lack of periodic reassessment. Parent's will have better information on their child's progress if the Ministry's new IEP standards are complied with.
12. The Ministry of Education and Training should emphasize the early identification of children with special needs before the IPRC process has been initiated and ensure that these children receive the appropriate programs and services and that parents are regularly consulted.	<ul style="list-style-type: none"> ▪ In process. Regulation 181/98 requires that programs be provided to children identified early as having special needs; the programs are to be based on information available at the time and can be provided even while children wait for an IPRC. ▪ A major early childhood-intervention initiative was begun in the fall of 2000 with \$70 million in additional funding. The Ministry has also funded a research project on early intervention strategies and supports undertaken by the Learning Disabilities Association of Ontario. ▪ In June 2001, the Ministry also introduced an early reading strategy aimed at improving the achievement of students in junior kindergarten to grade 3 as measured by the annual grade 3 provincial assessment.
13. The Ministry of Education and Training should revise the definitions and categories of exceptional children identified in the <i>Special Education Information Handbook, 1984</i> , to ensure that all students who have special needs can be identified as exceptional.	<ul style="list-style-type: none"> ▪ In process. Definitions were revised in January 1999, but the program-standards initiative will result in updated definitions for all 12 exceptionailities by December 2002. ▪ An updated <i>Special Education Information Handbook</i> is to be released in November 2001.
14. The Ministry of Education and Training should ensure that a greater level of training in special education is incorporated into basic teacher certification and that in-service training in special education is available to all teachers.	<ul style="list-style-type: none"> ▪ Not implemented. This report includes a further recommendation in this area. ▪ However, since our last audit, the Ministry has sponsored a number of initiatives aimed at identifying and sharing successful practices for meeting the needs of students with special needs in integrated classrooms. <p>Reforms to teacher training and evaluation were announced by the Ministry in June 2001.</p>
15. The Ministry of Education and Training should establish minimum levels of support staff required in integrated classrooms.	<ul style="list-style-type: none"> ▪ Not implemented. As this report states, educators we interviewed remain concerned about the level of support available to teachers of integrated classes.