

Comox Valley Schools Field Analysis on Special Education Policy and Practice

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Provincial legislation and Ministerial Orders govern the British Columbia education system. Individual Boards of Education create policy that align with government dictates and then Administrative Procedures to operationalize those policies. Finally, departments and schools apply those procedures to practice. In the case of Special Education, in the Comox Valley School District, the Student Services Operations Manual (2010) and past practice guide processes and actions.

As part of the in-service provided staff and individuals about what guides the Comox Valley Student Services Department, the following background is given.

The first recorded legislative appropriation to provide education to “handicapped children” in British Columbia was passed in 1890, calling for deaf children to be sent to the Institution for Deaf and Dumb in Winnipeg, Manitoba. In the ensuing years, programs for students with visual impairments and hearing loss and intellectual disabilities were provided in Victoria and Vancouver. In 1925 British Columbia had a report done that recommended the modification of curriculum for the mentally handicapped and the establishment of opportunity classes and special school facilities. In 1955 the provincial government introduced funding for programs for “handicapped” children as part of the basic grant. In 1982, Canada patriated its Constitution and within it the Charter of Rights reads “Each individual is equal before and under the law and has the right to equal protection of law without discrimination, based on race, national or ethnic origin, colour, religion, sex, age, or mental or physical disability” (“Constitution Act, 1982”, n.d.). The British Columbia Ministry of Education summarizes their Special

Education Policy as “All students should have equitable access to learning, opportunities for achievement, and the pursuit of excellence in all aspects of their educational programs” (Special education services: A manual of policies, procedures and guidelines, 2016, p.1).

This provides a grounding for the policies and procedures that guide the work supporting students with special needs in the Comox Valley School District. In addition to this there are several Ministry Orders that direct the work of Student Services Departments: Special Needs Students Order M150/89; Individual Education Plan Order M638/95; Student Progress Report Order M191/94; Support Services for Schools Order M282/89; and Section 11 of the British Columbia School Act. From all of this comes the Comox Valley Student Services Policy Statement:

The Comox Valley School District is committed to the philosophy of inclusion which is founded on the belief that all students, including students with diverse learning needs are fully participating members of our community of learners and should be educated in neighbourhood schools, in regular classrooms and in age appropriate settings to the maximum extent possible (E. Shatz, personal communication, March 13, 2020).

Moreover, the Ministry of Education (MOE) Special Education Services Manual (2016) on policies, procedures, and guidelines, outlines more extensive detail for districts. The document is over one hundred and forty pages, and outlines key topics such as roles and responsibilities, developing an individual education plan, special needs categories, the provincial resource program, internet resources, and a host of supporting appendices. The introduction clearly articulates the purpose of the manual is to “provide a single point of reference regarding

legislation, ministry policy and guidelines to assess school boards in developing programs and services that enable students with special needs to meet the goals of education.” The manual is meant not only for school administrators, school-based teams, and educators involved in special education, but also for social service community partners, parents, and the public (p. III). This resource was originally published in 1995 and has since been updated (2016).

While the policies and procedures provide guidance and direction, it is through the training and guidance given practitioners that the policies and procedures are enacted (E. Shatz, personal communication, March 3, 2020). The document that provides the most direction is the *Student Services Operations Manual*. Though out of date, it was last edited in February 2010, the manual reflects BC Ministry of Education Orders, and School Board Policy and Procedures, and provides written guidance in matters connected with the Comox Valley Student Services Department. Most of these directions are seen in practice despite practitioners rarely having seen the document(s).

### **Provincial Policy Summary Related to Non-Discriminatory Evaluation and Individualized and Appropriate Education**

The following several paragraphs will address an initial combined focus on two principles for effective special education, namely, Non-discriminatory Evaluation and Individualized and Appropriate Education (IAE). This is due to the Special Education Services Manual (MOE, 2016) providing specific details and directions in a format that conjoins both these principles. Once these provincial policies, procedures, and guidelines are described, a local perspective will be further explored.

The Special Education Services Manual (MOE, 2016) provides the most granular guidance on developing an Individual Education Plan. An overview of the process is described in five phases:

1. Identification and Assessment;
2. Planning;
3. Program Support/Implementation;
4. Evaluation;
5. Reporting (p.12).

These components are to be on-going and interwoven with the suggestion that they are “incorporated into the regular routines of planning, evaluation and reporting that occur for all students” (p. 12). In schools, specific procedures are to be established for timely information sharing, consistent documentation, and effective communication, collaboration, and problem-solving. At the district level, support includes awareness of the time needed, clear procedures for efficiency and privacy of information, clear professional standards as well as on-going in-service opportunities (p. 13).

Timely identification is seen as “an essential element of successful program planning for students with special needs.” Should students begin kindergarten already identified, assessment information should be shared to inform planning without delay. Should students not be identified prior to enrollment and present with significant needs, prompt responses from the classroom teacher and school-based team is necessary “for a determination of the need for assessment, planning and intervention” (MOE, 2016, p. 13).

Typically, identification and assessment would originate in the classroom, when the teacher observes student learning challenges and behavioural patterns. The teacher is required to

engage in “in-depth, systematic classroom observation and evaluation,” and attempt a variety of teaching and learning approaches. Consultation with parents, the student, when possible, is advised at this time. An appointment with a medical doctor is to be suggested to parents, to rule out other contributing factors for student challenges. This can be a challenge for parents to make appointments, for a variety of reasons such as work schedules, and a lack of commitment to and understanding of the process, for example. Further exploration and consultation with the school-based team professionals needs to occur through further observation, assessments, and intervention strategies (MOE, 2016, p. 13). At times, this can be sufficient to address the learning needs of the child. If not, a formal referral is required to the SBT (p. 14).

A SBT is clearly defined as:

an on-going team of school-based personal which has a formal role to play as a problem solving unit in assisting classroom teachers to develop and implement instructional and/or management strategies and to coordinate support resources for students with special needs within the school (MOE, 2016, p. 14).

Team members include professionals such as the administrator, learning support teachers, classroom teachers, and counsellor. Of note is the mention of the parents, student, and district professionals. Community representatives have a place in the meetings, depending on the specific needs of the child and this is determined by the SBT. The role of this team is to respond to the request of the class teacher to provide consultation regarding instructional strategies, with the possibilities of “case management, referrals and resource decisions.” Through the team’s involvement the specific services and referrals can be identified and accessed in the district or community. (p. 14).

When appropriate, a referral for an extended assessment is necessary through such professional expertise as “psycho-educational, behavioural, speech and language, orientation and mobility.” Clear parameters are outlined for these kinds of assessments and begin with written consent from the child’s parents. Professionals are to be “sensitive to cultural, linguistic and experiential factors when selecting assessment procedures and interpreting assessment results.” If interpreters are needed to facilitate understanding for families, these specialists are included. The information forthcoming must be “usable for purposes of planning, and easily integrated into the student’s IEP” (MOE, 2016, p. 15). Adhering to the “Freedom of Information and Protection of Privacy Act,” information gleaned from the assessments must be formally written and communicated to parents, educators involved, and the student, when appropriate (Section C.2, p. 15).

In Section C.3 (MOE, 2016), an overview of the planning process that results in an Individual Education Plan (IEP) is articulated, with the intention of identifying specific goals for the student, and “describes the nature of the commitments which the educational system makes.” Once again, “it is important the planning process begins at school entry or as soon as their special needs become known.” Of further importance is planning which supports the student with special needs requires through their various transitions from entering school, to secondary school, and to adulthood, but also for changes in programs, or from one school to another. An emphasis is placed on transition planning for students leaving secondary school into adulthood and “should identify inter-agency responsibilities or linkages that should occur before the student leaves the school setting.” The support of the school can be key “to provide a variety of coordinated activities that lead to employment and/or further education.” The flow of information and proactive planning for the student is viewed as critical to support student success

upon graduation (p. 15). Clear criteria for this transition are described in this ministry manual, as the “Graduation Portfolio Transition Plan” (p. 16).

Within the Special Services Manual (MOE, 2016), a thorough explanation of the purpose and contents of an IEP are described and a summary follows here. First, an IEP is defined as “a documented plan developed for a student with special needs that describes individualized goals, adaptations, modifications, the services to be provided, and includes measure for tracking achievement.” It is viewed as a collaborative planning tool for describing whatever the student’s specific needs are, whether requiring limited support or requiring more detailed planning (p. 16). Next, guidance on the purposes for an IEP are described: to formalize plans in connection to assessments; to provide a record of the student’s needs to inform their progress; to track learning that is linked to their clear goals; to document the professional services involved; and to provide a mechanism for parental and student involvement (p. 16). Finally, with this clarity, essential components of an IEP are outlined.

The IEP must include one or more of the following: goals that are unique to the student, specific services to support the goals, and/or adaptations to the “educational materials, instructional, or assessment methods.” It is recommended that the IEP also include levels of current performance, where the program will take place, the educators who will implement the goals, the time period for a review of the IEP, evaluative revisions, and transition plans. Each goal should be identified at an “attainable level to encourage parents, students and staff to hold high expectations,” and be measurable. The IEP could be brief or lengthy depending on the needs of the student (MOE, 2016, p. 17). With a specific reference to “School Act Regulation 5(7)(a),” it is stated that “the principal of the school is responsible for the implementation of educational programs.” This is further clarified to mean that even though the development of an IEP is a

collaborative process, with other professionals involved, the principal should ensure that each student has a case manager and that the IEP is followed. It is expected that all students with special needs have IEPs, unless minor adaptations are necessary, and the student requires “25 hours or less of remedial instruction” in a school year (p. 18).

Section C.3 (MOE, 2106) reinforces the importance of planning for and coordinating with community services to “avoid duplication, and to ensure consensus regarding goals, consistency in interventions and an integrated approach to service delivery.” The SBT has an important role to play for information sharing and making referrals to community professionals. Student and parental involvement in the process is viewed as best practice (p. 19).

Addressing program support and implementation is discussed in Section C.4 (MOE, 2016), and refers to “putting into practice the plans, strategies and support agreed upon in the IEP.” Before implementation, the IEP needs to be clearly reviewed and understood by all involved, including the student, when possible. Resources need to be in place, informed by “evidence-informed teaching strategies.” Key descriptions of how program implementation works best, to include “sensitivity to cultural, linguistic and experiential factors,” and on-going observation to ensure goals continue to be relevant, involves collaboration. Supports for students relate to accessibility to the learning environment, adapting instruction, use of assistive technologies, instructional interventions and remediations, modification of learning content, and providing specific training to the student. It is stated that “the student...is seen as first a student and not defined exclusively by those special needs” (p. 19-20).

For the evaluation of student learning, outlined in Section C.5 (MOE, 2016), the direction is given that “whenever possible, students will be evaluated using standards established for other students and on all components of their program.” This means that evaluation includes the “range

of adaptations and modifications” for students who participate in the regular program with some adaptations, in the regular program with some modifications, or take part in a program that is “completely modified.” When adaptations are used for evaluation, such as using an oral exam in place of a written one, it needs to be specified in the IEP and in keeping with the provincial reporting policies. When evaluation is based on significant modifications, it is appropriate for the evaluation refers to “individually established standards” (p. 20).

Section C.6 (MOE, 2016), on reporting student progress, in reference to Ministerial Order 191/94, provides guidance for using the same reporting schedule as all students and, if necessary, include informal reporting. When appropriate, should a student perform beyond their grade level learning outcomes, “letter grades and regular reporting procedures will be used to indicate progress” (p. 20-21). This section also clarifies that letter grades may not always be appropriate for a student if not capable of reaching the grade level provincial learning outcomes. Written reports completed by the professionals involved in delivering the IEP instruction need to be part of the reporting process. Reports should indicate where adaptations or modifications have been made (p. 21).

A discussion of students with special needs who also have different cultural or linguistic backgrounds is clearly provided in Section C.7 (MOE, 2016). Noting the possible experiences of “learning another language and new cultural norms, adjusting to a different social and physical setting, or overcoming homesickness or trauma can affect a student’s adjustment and learning.” These situations require a thoughtful, proactive approach because the situation may be “more complex when language, cultural or migration factors are involved.” Teachers are expected to consider cultural, linguistic or other experiential factors that can affect learning” prior to concluding a disability is present. Direction is given to provide additional time for

adjustment and “second-language learning and social adjustment.” Upgrading content learning, or social support may also be necessary.

On-going communication with parents regarding assessments and possible contributing factors influencing learning is necessary: “It is important to obtain a developmental and educational history, and parental perceptions and expectations regarding schooling” (MOE, 2016, p. 21). Other considerations include the use of an interpreter for communicating with families, alerting medical professionals of interpretation needs prior to appointments, and sensitivity regarding cultural factors influencing parents’ relationships with educators (p. 22). A clear direction is relayed for attention to “the selection and administration of tests to minimize the impact of the test’s cultural and linguistic biases. Interpreting the results requires full consideration of linguistic, cultural and experiential factors, and “the tests’ referent populations.” When using educational and psychological tests for students who come “from cultural and linguistic backgrounds different from the group on which the test was normed,” are referred to as “Standards for Particular Applications,” located through the American Psychological Association (MOE, 2016, p. 22).

### **Non-discriminatory Evaluation**

From a local perspective, Comox Valley Schools promotes inclusion practices through a clear motto, “A community of learners: innovative, inquisitive, inclusive” (Comox Valley Schools, n. d.). District policies outline guiding practices for these values to ensure “an inclusive and respectful learning environment will support students” (Board Policy Handbook, n.d., p. 3). For further clarification and specificity, Administrative Procedures (AP) 170 (2019), outlines non-discrimination beliefs and practices applicable to all members of the Comox Valley Schools community, including students, staff, parents, and other stakeholders. More precisely,

the district affirms equitable treatment of everyone “regardless of race, colour, ancestry, ethnic origin, religion, socio-economic status, gender, sexual orientation, physical or mental ability, or political beliefs” (AP, 170).

Regarding equitable assessment, evaluation, and placement of students, the district emphasizes a multi-faceted process to include “previous experiences, knowledge and cultural and linguistic background of all students” in order to enlighten “a comprehensive understanding of what students are capable of achieving.” Practices are to be monitored to ensure “principles of Inclusion, Multicultural and Anti-Racism Education” occur. Parents are to be informed and involved in student placement decisions. (AP 170, 2019).

When students are suspected of having special needs, a specific process is to be followed that is outlined in the Student Services Operations Manual (CVS, 2010) and matches the expectations described in the Special Education Services Manual (MOE, 2016) already described in this paper. The eligibility assessment process is described briefly in Section 17 referencing Ministerial Order, 638/95. Initial teacher assessments, followed by Level B assessments by a learning support teacher, and relevant specialist assessments by a speech/language pathologist or occupational therapist, if appropriate, needs to be completed with the SBT referral process. These more complex assessments require training to be completed (MOE, 2016, Appendix H). These assessments investigate student academic skills, with additional subsets, such as in auditory memory or spatial awareness. The results provide a student rating to indicate how they compare to thousands of student results in a similar age range (J. Hedican, personal communication, May 5, 2020). Should a further Level C assessment be deemed necessary, based on further questions emerging from the Level B results, a referral for a psycho-educational assessment can be made to the district. Level C assessments require an

advanced graduate degree and “a high degree of professional skill and judgement for their interpretation (MOE, 2016, Appendix H). Careful documentation of the process is necessary, to receive further funding from the Ministry and to qualify for an IEP (Operations Manual, 2010, p. 4). Once the psycho-educational assessments are completed, learning recommendations are specified in the school psychologist’s report, and a designation can be assigned.

The Ministry of Education identifies specific designations based on students with “disabilities of an intellectual physical, sensory, emotional, or behavioural nature; learning disabilities, or they have exceptional gifts or talents” (“Student Services Operations Manual”, 2010, p. 2). Please refer to Table 1 which outlines these designation categories, codes, and meanings. These designations are important to note since they are linked to the eligibility determination process but also inform district funding. Students require a designation in order to receive an IEP, which is further discussed for the next principle, that is, Individual and Appropriate Education.

Table 1: Ministry Designations

		CATEGORY	CODE	MEANING
Low Incidence	Level 1	1.19 DEP	A	Physically Dependent
		1.19 DB	B	Deaf/Blind
	Level 2	1.18 MOD ID	C	Mod to Sev/Profound Intellectual Disabilities
		1.18 PH – HEALTH	D	Physical Disabilities or Chronic Health Impair.
		1.18 VI	E	Visual Impairment
		1.18 DF - HH	F	Deaf or Hard of Hearing
		1.18 AUT	G	Autism Spectrum Disorder
	Level 3	1.16 INT BEH	H	Intensive Behaviour Intervention/Serious Mental Illness
High Incidence		1.17 MILD ID	K	Mild Intellectual Disabilities
		1.17 LD	Q	Learning Disability
		1.32 GIF	P	Gifted
		1.17 ModBeh	R	Moderate Behaviour Support/Mental Illness

In 2018, Comox Valley schools had 902 designations. Please refer to Table 2, which provides further data on these designations.

Table 2: Number of Designations, April 2019 (Appendix C)

<b>Designation</b>	<b>Number</b>	<b>% of Total</b>
A – Physically Dependent	11	0.15%
B – Deaf/Blind	1	
C – Moderate to severe/Profound Intellectual Disabilities	10	0.13%
D – Physical Disabilities or Chronic Health Impairment	128	1.72%
E – Visual Impairment	5	
F – Deaf or Hard of Hearing	17	0.23%
G – Autism Spectrum Disorder	186	2.50%
H – Intensive Behaviour Intervention/Serious Mental Illness	82	1.10%
K – Mild Intellectual Disabilities	28	0.38%
Q – Learning Disability	353	4.74%
P – Gifted	123	1.65%
R – Moderate Behaviour Support/Mental Illness	52	0.70%
<b>TOTAL</b>	<b>997</b>	<b>13.40%</b>

With a district commitment to educational excellence for all students, in light of non-discriminatory evaluation, it is important to note the number of Indigenous students who have designations. Out of 9189 students in the district in the 2018-2019 school year, 1550 students were Indigenous (17%). In total, 997 district students were designated, 258 were Indigenous students (26%) (“Aboriginal report 2014/15-2018-19: How are we doing?” 2019, p. 8). There were also 60 Indigenous students out of a total 156 students in alternate programs (38%) (p. 7). More specific data reveals that for behavior designations, there were 62 Indigenous students out of a total of 179 students (35%). A further look at comparative data for different age groups highlights that Indigenous students had significant behavioural needs at the grade four to seven level (p. 9). This brief data reveals there are a significantly higher proportion of learning needs and challenges within our Indigenous student population. The on-going priority to not only attend to the cultural and special needs of

Indigenous learners, but to ensure ongoing non-discriminatory evaluation, as it pertains to Indigenous backgrounds and experiences is necessary. It is a belief of the authors that evaluation practices are non-discriminatory, yet it is alarming to consider the data further to ensure Indigenous students are well supported and make continued gains.

Significant Indigenous supports do exist with a focus on learning Indigenous culture district-wide, as a key characteristic. Indigenous Learning is specifically identified in the district strategic plan, and tangible personnel supports can be found at each school. District Indigenous Support Teachers come into schools to model lessons, collaborate with teachers, and provide extensive Indigenous resources. Further, an Indigenous Support Worker is in place for each school, to not only work with Indigenous students, but to elevate Indigenous Cultural understanding for all. Data that indicates promising practices is the high Indigenous graduation rates in Comox Valley Schools, at 83% percent, higher than the provincial average and almost on par with the district's non-indigenous grad rate ("British Columbia Student Success Data, n.d.).

### **Individualized and Appropriate Education (IAE):**

In relation to the principle of Individualized and Appropriate Education (IAE), the Comox Valley Inclusion Policies and guiding principles for educational programs outlines the importance of supporting "the unique needs of every learner." This includes the principle that "individual learning paths for each student will be accommodated," ("Administrative Procedures, 400," n.d.). A.P. 100 outlines the essential nature of a sound planning process to ensure "all students have equitable opportunities to acquire the knowledge, skills and attitudes they need." Within A.P. 213, the Student Services Operations Manual (2010) is mentioned as the resource to further clarify the specifics of these policies and inform the Individual Education Plan process.

Although this manual is under revision, it provides the framework for how student services will be enacted in reference to the Ministry Special Education Services Manual (MOE, 2016, p. 2) and Ministerial Order 638/95 (p. 8). It guides the development of an IEP, as a “working document” that is to be reviewed once a year. An IEP is defined as follows: a written plan developed for a student that describes the program modifications and/or adaptations for the student and the services to be provided. It serves as a tool for collaborative planning among the school, the parents, the student (where appropriated), and, as necessary, school district personnel, other ministries, and/or community agencies. (17.2).

The Operations Manual (2010) goes on to specify the assessment practices, aligning with the Special Education Services Manual (MOE, 2016) for students with an IEP:

- Where a student with special needs is expected to achieve or surpass the expected learning outcomes set out in the provincial curriculum, regular letter grading practices and reporting procedures will be followed (17.4.1).
- Where a student is on modified curriculum, anecdotal reporting will be used in addition to letter grades that reflect student progress on their modified curriculum (17.4.2).

It is important to note that this school year, the Director of Student Services has introduced a new format and approach to engaging in the IEP process for and with students, their families, and the educators involved. The new approach is referred to as a “Competency Based IEP,” and is more reflective of British Columbia’s redesigned curriculum. More current documents and information than outlined in the Operations Manual (2010), were shared with Comox Valley educators in June 2019, to support understanding and implementation of these new IEPs. Formal policy changes at the provincial and local level have not occurred yet and

Comox Valley Schools are in a time of learning and exploration with this new approach. This is also occurring in other jurisdictions around the province.

A Competency-Based Meeting Guide (T. Pedersen, personal communication, 2019), alongside several documents, were provided to Principals, Vice Principals, and Learning Support Teachers. Within it, more specific details are outlined regarding the new IEP format, with three key components. First, student voice is included in order to describe their interests, learning preferences, strengths and stretches. Next, core and curricular competency goals with objectives and strategies are identified to reflect the learning needs of the student. Finally, universal and essential supports are outlined to further specify how these goals will be achieved. Please refer to Appendix A which shows different supports that can be recommended in an IEP.

While the policies and procedures are clearly described, the reality of practice illuminates the need for continued attention to better serve student needs. With a district that emphasizes teacher decision-making for student best interests, the predominant reliance on teacher-initiated referrals can be problematic. First, teachers early in their career may not understand the process or what indicates a need for a deeper investigation into student learning challenges and can be reluctant to voice their lack of understanding. Secondly, depending on teacher beliefs and willingness to pursue a further look at a student's challenges, some may choose not to prioritize the process, resulting in students being overlooked. Thirdly, at times teachers may have an erroneous belief that participating in an SBT referral, will result in more tangible classroom support. This is inaccurate due to limited funding available. Finally, others, having pursued the referral process and not received further support, may choose to refrain from further engagement due to a lack of trust in the process to impact class conditions. Exposing the underbelly of this perspective, there is a tendency for some to perceive the SBT referral process to be primarily

about what the teacher can access, rather than to be about better supporting a child, and what the teacher can address in their practice to accomplish this.

There are currently three district school psychologists who are generally able to complete two psycho-educational assessments per school per year. The SBT reviews the list each year to prioritize who will be receiving an assessment, adjusting the plans based on the complexity of the students. Students transitioning to adult care are typically the first priority. Next, students with intellectual disabilities are considered, because they can potentially access further supports. Finally, students who may have learning disabilities are considered. Contributing factors are the age and degree of challenge being experienced by the student. Younger students in early primary grades, with possible learning disabilities, are generally not tested ahead of students in higher grades, since younger students are given more time to develop. Some families, who have the financial means, may choose to have this assessment done privately.

Further delving into teacher views, there is a frustration by some early learning educators regarding the lag in response for support for young students who show signs of special needs and/or vulnerability upon entry. While the Special Services Education Manual (MOE, 2016) specifies timely identification and prompt responses from teachers and the SBT, particularly for early learners, there is more often a “wait and see” approach to allow for students to develop. The perspective of primary teachers and some administrators are that early learning concerns require more responsiveness and immediacy by the SBT for student success that may not require a designation referral process. These teachers have shared that kindergarten students have presented with increasing diversity and they have little support to make a strong impact on their students. Educators perceive the IEP referral process as problematic for Kindergarten students who show signs of having challenges, since some of these students do need extra support but not

the kind of support provided through a designation. Simultaneously, there is a cultural emphasis on the importance of early intervention to impact the trajectory of a student and, as a result, there appears to be a mismatch between policy and practice.

For students who already have designations upon entry to kindergarten, transition meetings are held to ensure the school is informed about the specific needs of the child. Recently kindergarten teachers have been invited to attend these meetings, which has been met with welcome relief. In the past Student Services Professionals and the Learning Support Teachers were the only ones who attended. Some kindergarten teachers have noted that designated students receive much more support prior to school entry than what is made available in the public system. The need for completed paperwork can impede the school's responsiveness to the student's needs as does the change in student teacher ratio. In preschool contexts, for example, there is adult support for every eight students, while in kindergarten classrooms there is, typically, at a maximum, one adult per twenty-two students. The reality of an extra adult, such as an Education Assistant, is often unavailable, and if so, for part of the school day. Again, our early learners need further support at this critical time in their lives.

The implementation of IEPs within a school, requires collaborative management and leadership within a well-run SBT. Not all teams are managed as effectively as others. Meeting structures are not always enabled, resulting in time being wasted, for example. How notes are documented and accessed by teachers and specialists from year to year differ from school to school and by level: all SBTs differ in effectiveness. One specific example of an SBT needing further development led to the engagement of an SBT Review. The impetus was the addition of several new team members joining in September 2018. While clear guiding parameters for team effectiveness, a revised template, and process for tracking notes were identified; there is more

attention needed on improved facilitation and team awareness regarding time management and accountability.

While the IEP process is clearly articulated, an on-going need to better support diverse student needs, whether designated or not, is to improve teacher practice. A fundamental understanding of inclusion is critical to ensure teachers have a mindset of support and responsiveness to all students who are part of their classrooms. Shelley Moore, provincial expert on inclusive education, has facilitated several professional development sessions which provide key messages on shifts needed to better support and celebrate student diversity in all students, not just those with designations. Moore promotes inclusive classrooms in which “we don’t start with our deficits; we start with our strengths” (2016, para. 12), to create classrooms for everyone rather than the “silos of special education” (para. 14). Educators in Comox Valley Schools need to continue to develop these important mindsets and understandings.

While there is a predominant assertion that Comox Valley Schools teach students, not labels, there is significant work needed for educators to indeed live this phrase. At a micro-level, there can be an over-reliance on special needs designations by some, at the expense of serving students who have not yet been designated. A more in-depth collaborative approach between classroom teachers, learning support teachers and administrators, to address classroom needs, apart from student designations, is essential. For this to occur, strong and informed, distributed leadership plays a key role. Learning Support Teachers, for example, who embrace contemporary pedagogy and perceive themselves as leaders who help teachers better implement inclusive education practices, have a persuasive role in changing practices. These specialists may not all recognize their leadership role and their ability to influence others through coaching and collaborative conversations.

**Zero Reject**

The Comox Valley Schools Board Policy Handbook (n.d.), defines inclusion policies and guiding principles “to ensure students achieve their fullest potential” (p. 3). Central questions to inform decisions are identified, such as, “Does it support student success?” and, “Will it promote, encourage, and foster learning for everyone?” (p. 3). Further, Policy 6.2 describes educational programs in which “individual learning paths for each student will be accommodated” and “support the unique needs of every learner” (p. 3).

Administrative Procedures 355 on student behavior and discipline (2019), clarifies with more specificity the policies and procedures as they relate to the principle of Zero Reject. A priority is placed on schools operating “in a healthy, secure, safe and orderly environment,” recognizing that student behavior “is fundamental to accomplishing this mandate and mission.” As a result, Policy 355 (n.d.) articulates the occasions when “individual rights may be limited and/or restricted.” Each school is required to have a code of conduct “outlining student entitlements and responsibilities, describing processes and explaining sanctions.” These may be co-developed with the school community and need to be written and reviewed regularly (Section 1.5). An emphasis is also placed on proactive programs and “alternatives to student suspensions” to support student learning and ownership of behavior (Section 1.5.9). If necessary, a Case Review Committee, comprised of the school principal and district staff, operates to determine the best course of action for students who have repeatedly breached school codes of conduct. This committee decides possible alternative placements and/or reduced attendance at their school (Section 1.6).

Should the situation arise in which a student is having difficulty in the general education classroom, policies articulate the principles and procedures to avoid their exclusion, and to seek

supportive approaches. Since some students with behavioural challenges may be perceived as stressors in schools, Board Policy 23 (n.d.) refers to the “Physical Restraint and Seclusion of Students” and has particular relevance here. This policy is clear regarding guiding principles and steps to be taken to proactively ensure all is done to minimize negative impacts of behavior and student exclusion. The following paragraph describes the key points of this policy.

Employees are expected to use “a variety of educative, preventative and restorative interventions to respond to a range of disruptive student behaviors” (“Board Policy Handbook,” p. 8). These interventions emphasize preventative measures with positive mental and emotional support provided. “Positive Behaviour Intervention Supports” (PBIS) are encouraged, due to positive links to student achievement. A functional behavior assessment is completed when behavior impedes student learning with specific plans developed such as an IEP, and/or a Safety Plan, that include potential underlying causes and purposes of behavior. Physical restraint and seclusion are avoided unless “the behavior of a student poses imminent danger or serious physical harm to self or others” (p. 9) Staff involved with the student should receive training in Non-Violent Crisis Intervention. Parents are kept informed of significant behavioral events, staff responses and plans. If student behavior continues to be unsafe and impede the learning of others on a consistent basis, “programming may need to be reviewed with parents, outside agency and team. This review may include and is not exclusive to: an abbreviated school day, an alternate setting, alternate programming, home schooling, Distributed Learning until the student’s behaviours have stabilized” (“Board Policy Handbook, p. 9,” n.d.).

In practice, strides have been made to include all students in regular school programs, regardless of their designations. When significant behaviour becomes more overwhelming for the classroom and student, alternate programs are an option for consideration. These programs

are further discussed for LRE and follow below. Please also refer to Appendix D, which describes district alternate program options. Of further relevance here, is the on-going work school leaders do to improve teacher and parent understanding of practices that support inclusion in classrooms. This is key since at times some may jump to requests for students to be suspended, without fully understanding the students' needs. Some schools have deeper work to do to address beliefs about inclusion. In one school, for example, an alarming outburst by a student with autism, led to strong reactions by teachers and parents, who were not aware of or focused on the anxiety the student was experiencing that contributed to his behaviour. An outcry by many that emphasized a concern for safety rather than on understanding what was occurring in the environment and for the student, were problematic. This situation was viewed by school leaders as "formative assessment" to inform the specific work to improve collective understanding. Release time was provided by the district for an afternoon for the whole staff for professional development on inclusion and how to support the needs of students with autism. The staff have continued to engage in professional development on the work of Ross Green, to delve more deeply into understanding the lagging skills that student behaviour reveals. One other issue of concern is the practice of a completely new referral process for students with behaviour designation that enter the system from another district. While this is important for ensuring a solid, non-discriminatory process, it impedes, at times, much needed support for these vulnerable students during a significant transition. In sum, while district policies on zero reject are clearly outlined, deeper, and more pragmatic work in practice continues to be necessary.

## **Least Restrictive Environment (LRE)**

### **Policy**

In the Provincial Special Education Policy Manual, clear and specific directives are given with respect to least restrictive access to learning. School Boards are responsible for ensuring that special education services and programs are delivered to any of their students who require them and that they are as seamless as possible (“Special Education Policy Manual,” 2016, p. 6). In the Appendices, the first part clearly directs districts to make sure their buildings are fully accessible, and if matters arise where inaccessibility is a factor, the district is expected to “complete those changes to existing buildings that are possible and reasonable as student needs are identified” (p. 108). For example, this past spring a student in a wheelchair was scheduled to move to her neighbourhood middle school. In consultation with the child, her parents, the school district’s maintenance department, and the site-based principal, more than \$50,000 worth of renovations were put into the school, despite this school being scheduled for demolition within two years. There was one other change that was required, but it would have cost more than \$60,000, so the staff at the school in working with the student, developed a plan to use human resources to support her mobility rather than having the district incur the added expense. This work was all done and designed in a proactive, collaborative manner.

Moving from the physical, the policy identifies that services in districts should be organized along a continuum which “reflects the diversity of students’ special needs” (ibid). The Policy Manual continues to outline the different types of services that might be available but is clear that “special education services should be organized for delivery at the school level” (p. 8). The Policy also provides that a support system should be available at the district level to provide specific expertise that it is not prudent or reasonable to expect each

school to have access to, and that districts “should ensure that when the resources available at the school level have been exhausted, a mechanism is in place to provide additional assistance to the school using district-level or community-based resources” (ibid). However, districts are not left alone when supports are needed beyond what is practicable for each district to have. Specific learning challenges such as being deaf, blind, or autistic, are specifically referenced with provincial support services identified to support these children. There is also a specific section that describes a provincial resource program established to support educational programs of students using technology. “School districts receive services for students who demonstrate restricted access to the curriculum primarily due to the following: physical disability; autism spectrum disorder; moderate to profound intellectual disability; and/or visual impairment” (p. 114). This group is resourced and mandated to support accessible learning throughout the province and relies heavily on technology to do this. They support student access in many ways from providing in-service training to adaptive tools. Recently a local middle school was recognized for its work on creating the least restrictive environment possible and became part of a district program. Over the year the staff have identified needs, received training, and received resources including furniture, technology, fidgets, and other items designed to increase ease of access to meaningful learning for all students (“SET BC – Inclusive Schools Blog”, n.d.). Provincial expertise and resource augment district expertise and resources which augments site-based expertise and resources which augments individual teacher expertise and resources.

The Comox Valley School District motto is “A community of learners: innovative, inquisitive, inclusive” (“Comox Valley Schools,” n.d.) and policies have been reviewed to be consistent with that motto. Within the school district’s Guiding Principles (“Board Policy

Handbook,” n.d., p. 3) there is direction for actions “An inclusive and respectful learning environment will support students” (ibid) and the Board of Education is responsible “for providing an education system that is organized and operated in the best interests of the students it serves” (p.5). Policy 23 is even more declarative identifying that the Board of education “believes that access to an effective educational program is a basic right of each student. The board further considers positive educational/behavioural interventions, mental health supports and least restrictive approaches to the provision of students supports to be best practice” (p. 106).

From the policy flows the Administrative Procedures which direct actions within the district. These documents provide little in the way of guidance for creating least restrictive environments for learning. Administrative Procedure 200 – Organization for Instruction only briefly addresses Least Restrictive Environment and only tangentially as it allows for multi-level offering being established “to meet the needs of individual students whose continuous progress may be better served that way.”

Administrative Procedure 213 – Student Services is very declarative:

All students, including those with special needs and those challenged by circumstance, are fully participating members of a community of learners. Consistent with current legislation, the District believes that Student Services programs and services are to be provided throughout the K-12 system in the most inclusive setting possible, notwithstanding that in some specific circumstances alternative programs or service models may be requested, as appropriate and/or beneficial to the student.

Toward this end, the District supports the development of specialized services and programs supporting the curricular and behavioural goals of individual students with unique needs, groups of students, and students in general. (“Administrative Procedures,” n.d.)

However, this is all that this Administrative Procedure states as it then points people to the Student Services Operations Manual (“Student Services Operations Manual”, 2010) for guidance about implementation and is at the front of the Student Services Operations Manual (2010).

The manual is consistent with the Ministry of Education’s policies and procedures, “except when adapted to local circumstance or when constrained by the limitations of financial and temporal resources” (“Administrative Procedure 213”, n.d.). Section 2 of this manual describes the goals of Student Services. Section 2.1 identifies the desire to “provide support for students with special needs to achieve their individual potential by supporting inclusionary practice and developing specialized programs and services” (“Student Services Operations Manual”, 2010, p. 2). Section 2.3 is specific and calls on the Student Services Department to provide “school-based services that are available to support and enhance student learning. These services are non-categorical (available to all students) and include learning support teachers, counselors, English as a second language/dialect (ESL/ESD) teachers, child and youth care support workers, and home/school support workers” (ibid).

Consistent with Ministerial Orders – M150/89, Amended M397/95 – Section 9 indicates that students with special needs “will be offered a program in the classroom where the student is integrated with other students who do not have special needs, unless the educational needs of the student with special needs or other students indicate that the educational program for the student

with special needs should be provided otherwise” (“Student Services Operations Manual, 2010, p. 4) and administrators are required to offer to consult with parents “regarding the placement of the student in an educational program” (ibid).

At the end of the Student Services Operations Manual (2010), Appendix E outlines the roles and responsibilities of teachers and education assistants and some of them are specific to providing the Least Restrictive Environment possible for students.

The teacher responsible for a student with special needs is responsible for designing, supervising and assessing the educational program for that student. (p. 22)

Teachers are expected to design programs for students with special needs. Education assistants play a key role in many programs for students with special needs, performing functions, which range from personal care to assisting the teacher with instructional programs. Under the supervision of a teacher they may play a key role in implementing the program. (ibid)

With respect to written and codified policies and procedures, there is very little about the procedures for determining the placement of a child in an educational program as much as there is about the different supports and services that can and are provided for students with special needs. However, there is considerable guidance provided through systemic practice and precedence.

### **Practice**

Currently in the Comox Valley School District 997 students (13.40% of the total student population) have Ministry Designations and of those, very few have restricted learning environments. Except for Glacier View Learning Centre which has most students attending by choice anyway, only 34 students (3.41% of those with Ministry Designations or 0.46% of the

total student population) participate in programs requiring them to attend schools outside of their normal catchment area and in these cases it is because their needs exceed what the average school is able to provide in terms of support.

Based on the procedures and protocols presented above, the clause that directs what happens in Comox Valley Schools the most is in Administrative Procedure 213, Procedure 3 which directs “Principals administer the educational programs in a school and are required to adhere to the Student Services Department Operations Manual or receive prior approval for variance. The Director of Instruction, Student Services is required to provide direction, support, and advice to principals regarding program implementation, evaluation and review” (“Administrative Procedures”, n.d.). This Administrative Procedure was adopted April 16, 2001. Principals determine student placement in classes, in programs, and supportive resources. In order to do this, they can consult with a myriad of people depending on the learning needs of the child. At the school level the principal consults with classroom teachers, learning support teachers who have specific training and qualifications, counsellors who are also teachers with specialized training, educational assistants, the student and the student’s parents. Many of these conversations happen through our SBT structure. This structure brings together people with different expertise to help advise the principal on the appropriate placement and supports for complex children. Each school-based team functions a little differently, but most meet weekly and have administration, learning support teacher(s), counsellor(s), and classroom teachers present to discuss ways to adjust support for individual student needs. These meetings are very different than the IEP meetings.

If further expertise is required for planning, the school district has trained professionals for Autism support, technology, extreme behaviours, psychologists, English

Language acquisition, gifted, deaf and hard of hearing, visually impaired, occupational/physical therapy, transition planning, and Indigenous cultural support. A third layer of consultation that principals have at their disposal are community partners such as Youth and Child Mental Health, Ministry of Children and Families, John Howard Society, local doctors, and various community groups/individuals. In particularly complex cases, the site-based principal will gather the pertinent information and be in continuous dialogue with the Director of Instruction: Student Services.

Most students with IEPs receive their instruction in the regular classroom with cascading supports based on needs. Our school district has seven programs that pull students from their neighbourhood schools, but these moves only occur after much consultation and the involvement of the Director of Instruction: Student Services. The Challenge Program is for students in grades four through seven who are identified as gifted. The identification process used to involve all students in grade three taking a cognitive test, the Canadian Test of Basic Skills, with the top 5% being selected for further assessment for creativity and an interview. However, that process was too expensive, and the district moved to a three-step process about 10 years ago. Parents and teachers complete a checklist on each potential candidate to see if they meet the requirement for 'Gifted' and those that do are then given a cognitive assessment. The final step is to have an informal assessment with the teacher that involves an interview and specific tasks. Those selected attend, at parent expense, a one day/week program with others at the same age group from around the school district. 95% of parents accept the offer of a position for their child. This program currently has 55 students in it (Appendix B).

For elementary aged students with profound behaviour challenges, there is a Behaviour Resource Program that provides them with behaviour modification skills during one half-day/week. Students need to meet strict Ministry Guidelines and have an “H designation” for severe behaviour challenges. Their parents need to support them being part of the program and it is important that they fit the mix of children already in the program; if they do not, they are put on a waitlist until the composition of the program changes. This program has a continuous intake with six students present in the morning and another six in the afternoon. Students are also put on the waitlist if their school has too many children already attending; the district tries to avoid having two children from the same grade level and school at once. There are currently 58 students from grades one through seven attending the Elementary Behaviour Resource Program (Appendix B).

At the middle school level, we have one district program for students with profound learning challenges, many of them with Autism. These are students who need life skills programming to support their development in order to participate in society to the highest level possible. This is a group with very diverse needs and includes many of our students with Autism. These students are not yet on fully modified programs, the district tries to wait as late as possible before taking this step. The program is designed for students coming from elementary schools that are on highly adaptive programs and are cognitively impaired. This program is housed in a Middle School and significant efforts are made to have the students participate completely in the learning community. There are currently seven students in this program (Appendix B), and it is growing. Next year the projection is that there will be 15 to 20 students participating. The students from this program will, most often, move to one of two programs at the secondary level.

One program is for students designated as Low Incidence who are significantly impacted in two or more domains. These students need to identify as disabled with their disabilities having a significant impact on their learning and functioning. These students are on fully modified programs, meaning that they will not graduate with a BC Dogwood Diploma. Students in this program have full access to school participation commensurate with their abilities. There are currently 27 students in this program. The other secondary school program is at another school and is for students with Moderate Intellectual Disabilities and the goal of this program is to integrate the students as much as possible with the regular student body while preparing them for life after school. Student context is reviewed and those with Moderate Intellectual Disabilities – under an IQ of 70 – and with an impairment that is debilitating will get into the program if there is room. Low incidence students get the first invitations. In any given year there are between zero and three students on the waitlist. There are currently 24 students in this program (Appendix B). With both secondary programs, our district has partnerships with the local college to help support transitioning to life after public school.

The seventh program we have, that isn't really a single program as much as it is a different school that houses three programs. Glacier View Learning Centre targets students who, for a variety of reasons, the regular school system does not work. These reasons are not directly related to academic ability but more psycho-social and socio-economic factors. The Bridgeway Program is for students in grades seven through nine with behaviour challenges that have prevented them from being successful in mainstream schools. The program is designed to support students with more productive behaviours, anger control, communication skills along with some academic work and has between 17 and 20 students enrolled on average. These students attend in the mornings for four days a week while students in the Junior

Alternate Program attend in the afternoons. This program has the general mandate the entire Glacier View Learning Centre has and that is to support the at risk and vulnerable students in our district using an alternate way of education. We have seen an increase of students suffering from anxiety finding success in this program. On average there are between 17 and 20 students in grades eight and nine that attend this program. The third program that runs at Glacier View is the Senior Alternate Program. Students attend for half days, like the other two programs, and work at their own pace. There are, on average, 20 students in each of the four sessions and their needs are very diverse. There are many ways that students find their way to Glacier View. It used to be that the only way to get there was to go through a Board Suspension process and one would be placed there as the district's last attempt to provide an educational program. The majority of these students had anger, behaviour, mental health, and addiction challenges. Over the past five years, Glacier View Learning Centre has evolved from a dead-end school for dropouts to providing a program of choice for many at-risk and vulnerable youth. The care, compassion, and support that students get here helps many of them find success and graduate when all other supports have failed. Glacier View has its own, growing, grad class and has numerous students who attend for months or a couple of years as they transition back to programming in regular schools. For more detailed information about the Glacier View Learning Centre please see Appendix D.

Professional Development is very much seen, and protected, as a teacher's professional discretion. So, within that context the school district is limited in what it can do. Yes, Administrative Procedure 170 recognizes that effective staff development is crucial, and the District is "committed to providing in-service training opportunities for all employees" ("Administrative Procedures," n.d., 170, 5); but employees need

to avail themselves of these learning opportunities. At the elementary level, schools have two staff meetings a month with one of them being focused on professional development. Some administrators have been able to use these staff meetings to provide targeted professional development for teachers. At the secondary level this does not happen. Across the district, different groups provide opportunities for employees to receive professional development and then it is incumbent upon the employees to participate or not: most don't and the ones that do, tend to be the same people no matter the offering. Some targeting professional development does occur in response to evolving needs, i.e. district staff will come in to work with a teacher to develop strategies to support student X, but much of this is reactive rather than proactive or systemic training.

Despite the policies, procedures, and guidance the Comox Valley School District still experiences challenges to inclusive practices. These challenges come from parents and from staff. There is general agreement that all students need the opportunity to be educated in the least restrictive environment possible "as long as it's not in my/my child's class." There is no official support for this sentiment, however, it is pervasive in the system, a system built on appeasement rather than directive. Parents often will take to social media to challenge decisions; while teachers use staffrooms, incidence reports, and in some cases, other parents, in order to have students removed from classes and, in some cases from schools. Most educational leaders in the Comox Valley School District understand the rights and need for least restrictive environments for learning and uphold them; however, they are challenged by parents and employees when such placements become inconvenient or difficult. Rarely do other students challenge such placements.

There is limited support for Professor Bourdieu's assertions in the Comox Valley School District. The policies are clear that all students should be educated in the least restrictive environment possible and the policies are supported by the Administrative Procedures and the Policy Handbook. The educational leaders know and apply the policies, so the system and those running the system are actively supportive of meeting the needs of the most vulnerable. Where Professor Bourdieu gains traction is with the parents and teachers who challenge these placements and these people are predominantly from the middle class. The parents that protest the placement of other students often challenge based on the disruption to their child's learning environment. The teachers that protest the placement of high needs students in their classes tend to be teachers with limited skillsets, work ethic, and who have "done school" effectively their entire lives. These people fit into Bourdieu's narrative and believe that the education should support the mores and values of the middle class.

### **Procedural Due Process**

The Special Education Policy Manual clearly states that "[A]ll school boards must have appeal procedures to help resolve disputes" ("The Special Education Policy Manual, 2016, p. 4). It continues to describe the Ministry's expectations that the process be administratively fair and will include the right of students and parents/guardians: "to be heard by the school board; to be consulted in decisions affecting them; and to an impartial school board decision based on relevant information" (ibid). If participants in the process feel it is unfair or disagree with the results of that process, "the School Act provides for appeal to the Ministry Superintendent of Achievement in certain circumstances" (ibid). School District #71 has clearly defined appeals processes for those parents who do not agree with decisions made. The Appeals Bylaw (Bylaw 73) has established processes for parents to

express their questions or concerns to the appropriate authority. This policy only addresses appeals to the Board of Education; other appeals are addressed in the Administrative Procedures (AP 152). This policy covers many issues from suspensions (sections 2.1, 2.2, and 2.6) to retention (section 2.4) and educational programming (sections 2.3 and 2.5). This policy, however, is more geared to those who do not have satisfaction at any level and are forced to have a Board of Education hearing. The person must complete the “Notice of Appeal” form and upon request the chairperson of the Board will cause “a meeting to be organized to hear the appeal in a timely manner” (section 3.2). Of interest to note, the bylaw expressly says that “[U]pon request or need, the superintendent or designate will provide assistance to the applicant or cause such assistance to be available” (section 3.1). The Board of Education then holds a special, confidential meeting. The applicant and the respondent “may each have a support person present” (section 4.1). Specific information about that support person must be given, in writing, to the board at least three days before the meeting along with any other written documentation or material. The policy goes on to describe the process of the hearing and that the superintendent be there to “act as an advisor to the board” and if it is a decision made by the superintendent another member of the senior management staff will serve as advisor to the board (section 4.3). The board shall include, but not limit itself to, the following when making decisions (section 5):

1. Was the employee decision within the scope of his/her mandate?
2. Did the employee follow board policy in making the decision?
3. Did the employee follow school, site or program policies and/or procedures when making the decision?

4. Was there a review of the original decision with a reasonable attempt at resolution?
5. Did the employee give fair and reasonable consideration of the information available?
6. Was due consideration given for attempting to achieve a balance between the needs and rights of the individual student and the needs and rights of other students in the school and/or program?
7. Was there any new information or new perspectives arising from the hearing?
8. Is there any other information that, in the board's view, is relevant to the issue?

A written decision will be provided to the applicant and the employee in a timely fashion. The senior advisor will inform the applicant that they have a right to appeal the board's decision through the Office of the Ombudsman.

Administrative Procedure 152 outlines how decisions by employees are to be reviewed. The review is to include discussion of and alternatives to the original decision. This AP is specifically for decisions not involving general employee performance, alleged misconduct or alleged child abuse/neglect as these are covered in other district documents. At the beginning of this policy, the district states its belief that parents and students are to be able to have decisions reviewed, and employees are to be able to respond and that the discussion is to take place in an open, respectful and unbiased manner. Every attempt is to be made "to facilitate and resolve the issue at the level closest to that where the decision is made" and should occur "within a reasonable time frame from the original decision" (AP 152). The AP then goes on to outline the different procedures and steps that need to be taken, enumerating four steps: the employee level, the supervisor level, the district level, and finally the appeal level referenced above.

For parents who are not satisfied with the placement of their child in a specific program, or who are not satisfied with the supports and services being received at the school level, the matter can be “referred by the school administrator to the director of student services” (“Student Services Operations Manual, 2010, Section 16.1.5).

The process for appeals is also referenced and described in the Student Services Operations Manual (section 19) and it is consistent with the Board Appeals Bylaw and Administrative Procedure 152. All parents have the right to appeal any decision of an employee that significantly affects the education, health, or safety of the student. It indicates that parents are expected to attempt to resolve their differences with the teacher directly, before approaching administration. This rarely happens: in the past 10 years there have been 3 appeals that went as far as the Superintendent and none further. It also states that administrators should refer parents back to the teacher who made the decision for initial resolution of the issue. Regularly administrators will do this: rarely do parents follow through with this. The Manual goes on to indicate that the expectation is that the person appealing the decision will direct it at the person with the next level of administrative responsibility. This does happen often; however, in an ever-increasing number of cases, parents appeal directly to senior management.

While these policies are written and are followed, to a large extent, they are not easy to find and are not broadly communicated. Most, in the system, understand and abide by the policies and it is those people who support and guide parents as they appeal decisions. For example, often in schools, parents will complain to the principal without talking with the teacher. The principal then redirects the parent to the person who made the original decision. Rarely are advocacy organizations involved, and when they are it is mostly to provide information for the affected parent(s). Complaints about teacher decisions and actions are

moderately common, however, complaints about student placement in programs are not often appealed, due in large part to the processes followed in making those placements and the collaborative work done with parents. Having said that, every school deals with parents unhappy at the beginning of the year with their child's placement in a given classroom; but, that is always supported as a decision the school principal is responsible for making.

Stakeholders, by in large, are satisfied with the conflict resolution process; however, every year there are parents who are not happy or satisfied with various decisions. Rarely, do they follow the established processes, opting, rather, to use social media and personal contacts within the system to address their concerns. District employees are actively encouraged not to engage in such on-line discussions, and on rare occasions employees have been disciplined for their participation. The most common complaints do not come from the parents of students with learning challenges, rather they come from the parents of children in the classes with the students with learning challenges. The most common complaints are around behavioural expectations and class disruptions. The parents that complain are doing so because of the perceived negative impact on the learning environment for their child caused by the dysregulation of another child. Therefore, there is dissatisfaction with the process, but those dissatisfied are such because they choose not to understand or agree with the rationale behind the decisions. The majority of those dissatisfied are the middle- and upper-class members of our communities who have a perception of education as a meritocracy for sorting rather than an institution for improvement for all. This group would include the teachers whose classes these students are in as they struggle to have the skills or understanding required to meet the needs of all students. These teachers, then, activate the parents with like minds which creates most of the conflict seen in our schools. The teacher will make the occasional comment to key parents,

such as “We couldn’t get to that today because I had to help settle one of our classmates” or “I hope Johnny isn’t to traumatized by what he saw in class today, one of his classmates had a hard time following our expectations.” This, over time, has the effect of parents then advocating to have changes made to protect the learning environment for their child. Too many will think, if not say, “that child doesn’t belong here.”

In any given year, less than five students, on average, leave our district for other programs due to dissatisfaction with the supports they are receiving. The majority of these students opt for homeschooling or a blended format of some sort. Partners in Education is the most common program they join as it offers mobile support for learners learning from home, and programs tailored to individual needs. Most of these transitions are supported by our district. There is one other program in our community, Footholds, that is an independent school that provides support for kids with behavioral disorders, and the two students that have moved to that program went under protest about the lack of support they were receiving.

### **Parent Participation**

Ministerial policies provide opportunities for parents to be involved in planning educational programs for their children, but the expectations are that the school will drive the process and include the parents as it sees fit. Ministerial Order 150/89, the Special Needs Students Order, “requires that parents be offered a consultation regarding the placement of their student with special needs” (“Special Education Policy Manual”, 2016, p. 10); however, there is no requirement to follow up on this nor is there direction regarding what an “offer of consultation” might look like. The Policy Manual goes on to acknowledge that parents of students with special needs “know a great deal about their children that can be helpful to school personnel in planning educational programs for them” and then “advises”, but doesn’t

‘require’ districts to “involve parents in the planning, development and implementation of educational programs for their children.” (p. 10) Further, the Policy Manual identifies that parents have a responsibility to “support the education of their children” and “[A]t the request of the teacher or principal, vice principal or director of instruction...must consult with respect to the student’s educational program.” (ibid)

In School District #71 there is not a lot in policy about parent participation. Policy 23 references opportunities for parents/guardians to be consulted in the developments of plans for individual students, “where appropriate” in reference to physical restraint and seclusion of students. (Policy 23.6) Also, in Policy 23.11 it states that “[I]f a student struggles to show safe behaviour and interrupts the learning of others consistently, educational programming may need to be reviewed with parents, outside agency and team.”

Similarly, the Administrative Procedures have little with respect to parent participation. Administrative Procedure 170 – Non-Discrimination indicates that the district has a responsibility to develop communication strategies that will “assist and inform parents in their first language about their children’s progress” (2.2.3) and “[E]nsure that parents are adequately informed about assessment and evaluation procedures and involved in placement decisions.” (4.3.2) Administrative Procedure 202 – Multicultural Recognition encourages communication with parents and the school community to foster appreciation and understanding of our multicultural heritage. (2.5) The Administrative Procedure also call for staff, parents and students (where appropriate) use collaboration to develop written accommodation plans when needed, (2.6) with respect to cultural sensitivity. This plan would be different than an IEP and would focus on what needed to happen to better support the cultural needs of that family. Administrative Procedure 206 – Alternate delivery of curriculum guides parents to work

with schools in the alternate delivery of sensitive material, such as sexual education, creationism, and other potentially controversial topics, in the Physical Health Education curriculum and the Career-Life Education curriculum. Administrative Procedure 270 – Home Schooling give parents access to materials available and their neighbourhood school to support their home-schooling efforts.

Where there is real direction and support for parent participation is in the Student Services Operations Manual. This document outlines how to make referrals (5), parents rights for assessment (7), and the placement of students with special needs (9). Administrators are required to “offer to consult with a parent of a student with special needs regarding the placement of the student in an educational program.” (9.1) Further, in section 11, the classroom teacher is directed to consult with parents, “where appropriate” regarding concerns and progress. This grants the classroom teacher significant latitude with respect to consultation with parents. Section 16 offers the most direction in the Manual for parents as it addresses consultation and consent. “Parents will be consulted whenever the services outlined below are intended to be offered to a student” except in situations where that consultation would “not be in the best interests of the student” in which case the matter would be referred to the Director of Student Services. (16.1.1) Specific examples are not given of such cases, but over-time precedence and practice have helped inform such decisions. The areas identified as extra-services requiring consultation are any ongoing or formalized school-based services such as counselling or learning support; district-level services; and referrals to community-based services. If the parents disagree with the services to be offered, the matter will be “referred by the school administrator to the director of student services.” (16.1.5) Section 17 addresses the Individual Education Plan which “serves as a tool for collaborative planning among the school,

the parents, the student (where appropriate) and, as necessary, school district personnel, other ministries, and/or community agencies. At the end of the Student Service Operations Manual is Appendix G which is a document outlining what meaningful consultation is and how to achieve it. Within that document are the Guiding Principles for Meaningful Consultation: “[T]he family is the expert on the child”; “[M]utual respect is essential for meaningful consultation”; “[E]veryone participates as an equal partner”; and “[M]eaningful consultation does not mean parties cannot disagree.”

By design, parents’ perspectives are included in the IEP process; however, it is how their perspectives are included that seem to operate on a school by school basis and seem to differ based on the age and needs of the child. In many cases, the Learning Support Teacher talks with the parents after the initial drafts of the IEP are completed and asks for their thoughts and feedback. In most cases, the parents might ask some clarifying questions, but by in large they agree to the plan and sign it. In more complex cases – complexity comes from the age of the students, the learning needs of the student, and the capacity of the school – broader meetings are held, and consultative discussions ensue. Secondary level students with High Incidence challenges rarely will have significant consultation connected with their IEPs, with the recommendations rolling over year to year. Younger students with Low Incidence and multiple learning challenges tend to have more involved consultation processes for their IEPs. This process is protected by the student services department and the site-based teams. Where parents do not have means, staff act on the behalf of students and adjustments are made to have as much meaningful consultation as possible. However, as seen in the policy and procedure review, these measures are individual dependent and not codified. The district operates on a “best practice” footing with the expectation being that all members of the community will act in the best

interests of the child. This, quite often, means that school staff advocate on behalf of the student in order to gain resources from the central office. This is the greatest source of conflict within our system as the central office has very tangible limitations while school and program staff are free to focus only on their context and perceived student need, and parents rarely get involved.

Parent participation in school activities wanes with student age. Parents are very involved in school activities when their children are young, including consulting on IEPs; but as students get older, parents become far less involved, often only coming to the school for special events such as Christmas concerts and graduations. Granted, the more complex the student, the more the parents tend to be involved, but this too wanes as the child grows up.

Teachers are not trained at all to support home-school partnerships. In the most recent disruptive innovation, COVID19, teachers had to confront their greatest fears...picking up the phone to call home. As with parent involvement, teachers of younger students tend to work well with parents: teachers of older students do not generally work well with parents. The roles change and the mentality changes. As a rule, teachers of primary students share the teaching responsibilities with parents, and they reciprocate by being engaged. Equally, teachers of students in the secondary grades do not share the teaching responsibilities with home as much as they share the discipline responsibilities, such as being responsible for student attendance, work completion, and behaviour in class. Thus, the relationships between home and school are often strained. However, with the change necessitated by COVID19, many teachers of older students are having to change their relationships with parents and are having to partner with them to support the learning of their students. It will be interesting to see if this changes their relationships when students return to building and the teachers' sanctuaries.

It is in this area, parent involvement, that Professor Bourdieu has the most fodder. The higher the economic capital of parents, the more involved they are in the learning of their children. The more affluent the parents, the more likely they are to be present at their child's school. And, the more affluent the parents, the more likely they are to challenge the decisions, actions, and priorities of their child's school. Also, the higher the cultural capital of parents, the more likely they are to understand the language of education and the processes involved. The language of education is significantly skewed in the favour of the educated, and those with significant cultural and social capital. Consequently, the children of these parents receive a different education than those with parents having less capital despite the best interests of most teachers. Currently, we are seeing this disparity amplified. Affluent parents are demanding more rigor, more resources, and more direct teaching from teachers for their children. In some cases, these parents are augmenting the learning provided by teachers with supplemental courses, programs, and activities. Less affluent parents are struggling to support their children doing basic learning as they do not have the technology or resources (financial and social) to meet the learning needs of their children. It is not surprising that in many schools, the parents and students that no contact has been made with, are the poorest families.

### **Conclusion**

Professor Bourdieu argued that the power of the middle class was that schools be seen as a neutral space, a space where everyone has the opportunity to succeed. To achieve that, enough students from challenging circumstances have to find success, thus justifying the meritocratic system that it is. Educators are at the center of this illusion, working to support those with higher needs and celebrating their successes while reinforcing a system skewed to favour those with means. This further entrenches the power of the middle class who excel in a

system designed to prepare people for university more than for the realities of life. However, do Bourdieu's theories have support in practice in British Columbia? 84% of non-indigenous students in the Comox Valley complete high school: 83% of indigenous students in the Comox Valley complete high school, despite having double the per capita rate of Special Needs designations. And, 75% of students with Special Needs designations in the Comox Valley complete high school ("British Columbia Student Success Data", n.d.). Both Indigenous students and students with Special Needs designations have the same or better grade to grade transition rates than do their non-designated, non-indigenous peers (ibid). These are the official, reported numbers; but numbers don't tell the whole story. In those numbers is a misrepresentation. In the Comox Valley there is a distance education school that enrolls 2,893 students, or 28% of the reported total. This is significant because their school completion rates are very low due to the high percentage of students drawn to them from around the province that do not finish their programs. Also, the statistics are skewed by students who move schools, but still complete their public-school education (T. Demeo, personal communication, May 8, 2020). Consequently, when properly accounted for, the school completion rate for non-indigenous students in the Comox Valley is closer to 96%; thus, the earlier reported numbers lose some of their shine, but when not questioned, give the perception of a neutral space where challenging students find success.

Notwithstanding the previous challenge, Comox Valley Schools is a very successful district that has an excellent reputation for supporting vulnerable learners. One of the main reasons for this is that the system applies the policies and procedures that are designed to meet diverse student needs, despite most people not knowing where those policies and procedures are or where they came from; the system accepts, uses, and reinforces good practice. Evaluation

processes are in place to prevent discrimination. This causes some frustration for those in the field due to seemingly redundant and unnecessary processes; however, designations and documentation are accurate, defensible, and applied universally. Having said that, this review did find that students with Indigenous heritage were twice as likely to have a Ministry designation than were their non-Indigenous peers, which could challenge the claim to non-discriminatory evaluation.

The principle that the unique needs of each learner are important and that individual learning paths for each student will be accommodated is not only written in numerous policies and procedures but is acted upon daily by practitioners at all levels. There is growing flexibility and openness to providing multiple access points for learning and for demonstrating learning throughout the district, and that is for all students, not just those who are designated. Those with designations all have formal IEPs. Despite being slightly different school by school, the IEP process is inclusive and the IEPs are valuable tools. Most of the tension within the system concerning IEPs is when teachers and educational assistants do not follow the IEP for a student and that student's success is challenged. Unfortunately, this is one area where, sometimes, practice does not reflect policy. There are also concerns about the length of time it takes to get supports to some of the youngest learners and about how effective those supports are. Those who are designated, and those with IEPs, by in large have programs that are set up and executed to meet appropriate educational demands, tailored to individual need, and are successful.

We were able to find very, very few examples that could be considered students being excluded from the neighbourhood general education classrooms. In most cases, these exclusions were by student and family choice. For example, students with severe anxiety disorders tend to

feel more comfortable in the smaller, calmer, and more individualized Glacier View Learning Centre than in the local Secondary School. Another reason some students might go to specialized programs is when a small number of people require specialized supports and resources such as the Life Skills, Behaviour, and Challenge programs. When physical barriers present themselves, the school district is very responsive to address them, even in the oldest buildings, for students to attend their neighbourhood school. Finally, the paucity of suspensions for students with designations is a sign of proactive policies and actions to prevent lost learning time for vulnerable learners.

We did find a gap in formal policy and administrative procedures when it came to define least restrictive environments and placements of students. Practice in our district reflects inclusionary ideals, and placement of students within schools is solely at the discretion of the school principal. We also found that much placement of students in ancillary programs to schools comes at the discretion of the principal; however, there are several programs within the district that have protocols for admission. We did not find these protocols officially codified, but they were consistently applied. These programs mostly supported students with multiple, low incidence, disabilities. If a student qualified, they were admitted if space permitted, and if space was not available the student was put on a waitlist. However, we did find examples of where these programs grew based on demand, the most recent being the addition of a Life Skills program for middle school aged children. The biggest challenge to students receiving education in the least restrictive environment possible tend to come from parents, and teachers, who do not believe that the learning environment of the many should be negatively impacted by the needs of one or two others. These challenges tend to come from those members of the middle class

who lean toward traditional meritocratic educational values and are insecure in their positions of power.

Processes in the school district are very clear. Formal appeal processes are clearly laid out, though very rarely used. One might ask if this is because people do not know or understand them, but practice and experience shows that people throughout the system regularly educate parents about the next steps and processes if they are not satisfied with the direction or outcome of planning and meetings. Another reason for not having to use these processes is the emphasis on relationship building and educating parents from their earliest contacts with our district. Despite the written policies and procedures being the same for all at all levels, there are few of them and practices change from teacher to teacher and school to school. Best practice is strongly encouraged, but not mandated. Parents tend to be very involved when their children are young and less so as their children age. A lot of time and energy is invested at the primary and intermediate levels to work with parents, to engage them, and to help them understand what is being done and why. As the children move into the secondary levels, less time is spent with parents and less time is spent on all but the most complex IEPs with little accountability. It will be very interesting to see if our adjustments for COVID19 will have a lasting effect, because teachers are finding out the value of strong relationships with parents and our hope is that this will make that phone less heavy to lift in the future.

Professor Bourdieu might link our inability to overcome early years deficiencies for our students to the middle-class keeping others down. Students increasingly are entering our school system ill-prepared (“30 per cent of B.C. kids not ready for kindergarten”, n.d.). The measures for this are physical health and well-being; social competence; emotional maturity; language and cognitive development; and communication skills and general knowledge. Bourdieu would

identify this as highly predictable as those students from middle class families will naturally have a head-start in a system that is set up to value what they bring. Recognizing this, our system has increased spending on pre-school and doubled the time children spend in Kindergarten to close the achievement gap right at the beginning. Sadly, there is a strong correlation between low school readiness scores and low cognitive scores in grade four, which then have a high correlation to low achievement and school completion. These findings would support Bourdieu's assertions that the system is set up by the middle class to promote the middle class at the expense of those without the same cultural capital. However, he would struggle to link this disparity to intent: the testing done as children enter school does not cause the students to struggle. They are struggling before they enter the system and our system is designed to support those with the highest needs with the most resources. The Comox Valley School District provides a good example of this with all students receiving non-discriminatory evaluations that lead to individualized and appropriate educations in the least restrictive environments possible. Based on the lack of appeals, despite a clear and simple process for conflict resolution, the vast majority of parents are satisfied with the supports their children receive. The high school completion rates in all categories is a further testament to the quality of work done to meet the diverse needs of our most vulnerable students. Is this district perfect? Absolutely not. But, the systemic capacity and desire to improve are assets that make it very successful supporting vulnerable learners.

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**APPENDIX A: Universal Classroom Supports for Access**

<p><b>Universal Classroom Supports</b> These are supports that could be made available to any student to foster greater inclusion in the classroom.</p>	
<p><b>Assessment / Response</b></p>	<p><b>Scheduling</b></p>
<p><b>Technology: *must specify (Text-to-speech, Speech-to-text)</b>  <b>Alternatives to print</b> (audiobooks, movies, videos, digital media etc.)  <b>Oral instructions / reader</b>                  Use <b>simplified language</b>/directions  <b>Sound field system</b> in the classroom  <b>Visual presentations of verbal material</b> (word webs, visual organizers)  <b>High-contrast materials</b> with minimal visual clutter  <b>Lesson outlines</b>  <b>Alternate ways of responding</b> (oral, dictation, <b>scribe</b>, written, drawing, word processor, media etc.)  <b>Separate settings</b>  <b>Additional time</b>  <b>Graphic organizers</b>/Visual Supports                  Use of a <b>spelling dictionary</b>, etc.                  Use of a <b>calculator</b>, table of math facts, number line, manipulatives  <b>Alternatives to assessments / essays</b> (demonstrations, conferences, projects etc.)</p>	<p><b>Visual classroom schedule</b>  <b>Calendars</b> with special events  <b>Front-load schedule changes</b>                  Provide <b>choice</b>                  Allow <b>breaks</b></p>
<p><b>Content/Process</b></p>	<p><b>Self-Management/Organization</b></p>
<p><b>Reduce workload</b> (fewer questions, shorter assignments etc.)  <b>Reduce complexity</b> of content (more concrete, simplified vocabulary etc.)  <b>Increase complexity/abstractness</b> of content                  Allow <b>self-selected content/opportunities</b> to pursue individual interests  <b>Flexible pacing</b>                  Alternatives to <b>note-taking</b> (scribe, audio recording, teacher notes provided, take a photo etc.)</p>	<p><b>Planner</b>  <b>Work organization system</b> (Colour coded files, binder etc.)  <b>Classroom visual</b> supports</p>
<p><b>Environmental</b></p>	<p><b>Social-Emotional</b></p>
<p>Preferential / flexible <b>seating</b>                  Special <b>lighting</b> or <b>acoustics</b>,</p>	<p><b>Calm space</b> in the classroom  <b>Check-ins</b></p>

<p><b>Sound field system</b>                  Good <b>sight lines</b> and placement and illumination to facilitate communication for oral and visual language  <b>Sensory tools</b> (fidget items, wiggle cushion, standing desks etc.)  <b>Ability to move</b> around indoor and outdoor spaces easily to access materials                  Classroom zones/<b>alternate work spaces</b></p>	
<p><b>Instructional and Presentation</b></p> <p><b>Text-to-speech</b> and <b>Speech-to-text</b>  <b>Alternatives to print</b> (audiobooks, movies, videos, digital media etc.)  <b>Oral instructions / reader</b>                  Use <b>simplified language</b>/directions  <b>Sound field system</b> in the classroom  <b>Visual presentations</b> of verbal material (word webs, visual organizers)  <b>High-contrast materials</b> with minimal visual clutter  <b>Lesson outlines</b>  <b>Alternatives to note-taking</b> (scribe, audio recording, teacher notes provided, take a photo etc.)  <b>Provide captioning</b> (open and closed captioning)</p>	<p><b>Timing</b></p> <p><b>Additional time</b> for tasks and assignments  <b>Additional time</b> to process oral information and directions                  Use of a <b>timer</b> (visual, auditory) or countdown</p>
<p><b>Other</b></p>	

**Essential Supports for Access**

<p><b>Essential Supports:</b> These are supports identified through psycho-educational and/or medical testing and are necessary in order for the student to access the curriculum.</p>	
<p><b>Assessment / Response</b></p>	<p><b>Scheduling</b></p>
<p><b>Alternate formats</b> (Braille, specialized assistive technology) <b>Alternative and Augmentative Communication Device</b> (Talking Board, PECS, Hip Talk, Big Mac, Step-by-Step, PODDS, Touch Chat, Proloquo2go, Lamp Words for Life, Let me Talk, Eye Gaze etc.) <b>Signing</b> Assessment over <b>several timed sessions</b> Hand held <b>microphone</b> for RMT (Remote Microphone Technology)</p>	<p>Personal <b>visual schedule</b> Work/Break <b>schedule</b> Scheduled sensory/movement <b>breaks</b> <b>Choice zone</b></p>
<p><b>Content/Process</b></p>	<p><b>Self-Management/Organization</b></p>
<p><b>Acceleration</b> <b>Interactions with peers who have similar ability</b></p>	<p><b>Work organization</b> system (basket system) Personalized <b>Visual or tactile supports</b> <b>Learning Contract</b> Personal communication intent <b>dictionary</b></p>
<p><b>Environmental</b></p>	<p><b>Social-Emotional</b></p>
<p><b>Orientation and Mobility</b> Support (lift, walker, standing frame, cane, GPS etc.) Specialized <b>Seating</b> (Source of sound to stronger ear, individual wedges etc.) <b>Alternative personal work space</b> <b>Specialized equipment</b> (Slant board, switch interface, Powerlink, audio hub etc.)</p>	<p><b>Scheduled Check-ins</b></p>
<p><b>Instructional and Presentation</b></p>	<p><b>Timing</b></p>
<p>Designated <b>reader</b> or <b>scribe</b> Personal <b>hearing aid(s)</b> Personal <b>FM/RMT</b> (Remote Microphone Technology) system <b>ASL Interpreter</b> <b>Alternative formats</b> (Braille, large print, auditory, specialized assistive technology) Low <b>vision tools</b> (monoculars and magnifiers)</p>	<p>Personal <b>countdown</b> script/visual timer Personal <b>visual timer</b></p>
<p><b>Other: Service Dog</b></p>	

**Appendix B: Special Education Enrollment All Programs other than Glacier View**

PROGRAM/GRADE	K	1	2	3	4	5	6	7	8	9	10	11	12	OTHER	TOTAL
<b>CHALLENGE (GIFTED)</b>					15	15	17	8							55
<b>EL. BEHAVIOUR</b>		1	6	8	9	16	11	7							58
<b>LIFE SKILLS - LTM</b>							5	1	1						7
<b>LIFE SKILLS - ISFELD</b>									3	5	6	4	9		27
<b>LINK TRANSITION - VANIER/NIC</b>														5	5
<b>PREP - VANIER</b>										2	8	9	5		24

**Appendix C: Comox Valley School District Designations**

**DESIGNATION SUMMARY  
AS AT APRIL 3, 2020**

School	A	B	C	D	E	F	G	H	K	Q	R	P	TOTALS
Airport				1	1		5	1		3	4		15
Arden				10	1	1	4	2	2	4	4	2	30
Aspen Park				7		2	6	3	1	10	12	5	46
Brooklyn				4			6	2		11	3	6	32
Courtenay El.	2			5		1	7	9		3	15	2	44
Cumberland Community	1			10		2	10	6	2	17	4	2	54
Denman Island							1			1		1	3
Ecole Puntledge Park				5		2	8	5		7	13	6	46
Ecole Robb Road				1		1	2			10	2	9	25
Glacier View				3			6	7	1	20	6		43
G.P. Vanier			1	23		4	16	5	11	83	10		153
Highland				4			12	5		41	18		80
Hornby Island				1						1	3	1	6
Huband Park				5		2	2	5		9	1	6	30
Lake Trail Middle			2	10			4	5	4	27	7	1	60
Mark R. Isfeld	7	1	5	9	1	1	14	3	2	49	4		96
Miracle Beach				6			1	1		8		2	18
Nala'atsi Alternate				1						4	7		12
Navigate				3			2	1		10		2	18
NIDES	1		1	12			60	4	1	15		2	96
Queeneesh			1	4		1	13	9	3	7	7	2	47
Royston				1	1			2		6	2	1	13
Valley View				3	1		7	7	1	7	1	3	30
<b>Total</b>	<b>11</b>	<b>1</b>	<b>10</b>	<b>128</b>	<b>5</b>	<b>17</b>	<b>186</b>	<b>82</b>	<b>28</b>	<b>353</b>	<b>123</b>	<b>53</b>	<b>997</b>

**Appendix D: Glacier View Learning Centre****3 main programs:****Bridgeway Program (approx. 17-20 students enrolled)**

A dated and almost defunct program that was originally structured to accommodate students from gr. 7-9 with high behavioural challenges. This program used to be a full day program that usually had 8-10 students attend with 1 teacher and 1 Behavioural EA. A recent review of the Glacier View Programs by the school district via Clyde Woolman, produced a number of recommendations including reducing the Bridgeway Program to just ½ day due to low student enrollment and the need to optimize available staffing (at one point a few years ago, we had 1 teacher and 1 EA looking after 3 or 4 students some days in this program. The program was originally designed to support students with more productive behaviours, anger control, communication skills along with some academic work. Today this program runs AM only due to low numbers. The Bridgeway classroom is also populated with other gr. 7-9 students who are not deemed as behaviourally challenged but are vulnerable in some ways (academically, socially, emotionally, etc.).

**Junior Alternate (approx. 17-20 students enrolled)**

This program runs in the PM in the same classroom as the morning Bridgeway Program. This program has the general mandate the entire Glacier View school has and that's to support the At Risk or Vulnerable students in our district using an alternate way of education.

**Senior Alternate (approx. 20-22 students enrolled per session)**

Glacier View supports 4 senior alternate programs: One gr. 9-10 classroom & three gr. 10-12 classrooms. Each of our SA classrooms run both AM and PM sessions with the average enrollment of approx. 20 students in each session. This program also has the general mandate the

entire school has and that's to support the At Risk or Vulnerable students in our district using an alternate way of education.

Students find their way to Glacier View the following ways:

- Admin, counselling or SBT discussions at another school feel they have done all they can to support the student yet the student is still being unsuccessful. A request to Glacier View is then made, I accept the request as principal and arrange a registration meeting.
- Some students make poor choices in their school which may result in a Disciplinary Hearing at the SBO. Sometimes the recommendation at the end of the disciplinary hearing is to transfer the student to Glacier View.
- Parents/caregivers sometimes realize the lack of academic success of their child mid-year and contact Glacier View seeking an alternative way of education for their child with the hope it will reinvigorate their learning.
- Students by themselves periodically seek enrollment at Glacier View as they realize they need a change with regard to how they're being educated.
- Students and families that move to our community mid-school year who have relied on alternative programming in another community, will seek out Glacier View's alternate programming.
- A rather new approach via Tara Ryan (District Outreach Counsellor) has begun this year. Tara will seek out youth in the community who are not currently engaged with the school district. Usually the first step to academically re-engaging these students is to attempt to enroll them at Glacier View.

Glacier View's enrollment increased dramatically during the 2018-2019 school year where the school's enrollment went from 125-130 to 170-180 range. The current school year saw

Glacier View's enrollment rose to 186 before the global pandemic hit which prompted the school district to hire another teacher for the school. I feel if our district wasn't suffering from social distancing guidelines, Glacier View's enrollment would have hit 200 students at some point this spring.

As the school principal, all new student registrations are facilitated by me. I usually register around 100-110 new students after the start of the school year. The registration process for new students takes approx. 1-1 ½ hrs each. Some weeks, the school registers 1 new student / day which results in an ever-changing student body in the school and the ongoing challenge of familiarization and understanding of a never-ending influx of troubled or vulnerable youth. Of the 8 years I've been principal at GV, I have made the decision to not register a new student only 2 or 3 times and this decision was always the result of weighing outstanding evidence of drug dealing, sexual abuse, etc.