



**SNAC: Response to Consultation: Students with Special Needs:
Policy on the Organization of Services**

June 5, 2013

Me Remi Poliquin
Interim Director of Secretariat
Lester B. Pearson School Board

Subject: Consultation on the Draft Students with Special Needs: Policy on the Organization of Services

Me Poliquin,

The Special Needs Advisory Committee (SNAC) of LBPSB have had the opportunity to review and discuss the proposed policy, and wish to offer the following feedback, comments and suggestions for your consideration.

While we appreciate the opportunity to provide feedback on this important Policy, and the one-week extension to the deadline for providing this Response, the Special Needs Advisory Committee would like to reiterate our concern about the short timeline for this Consultation, as was expressed in our letter dated April 25, 2013. As a group with many members who are parents of children with Special Needs, the challenges of our daily lives are formidable. Thus, we maintain that additional time would have enabled a more detailed response, and we feel that the current response is incomplete due to the time constraint.

We also question if the School Board will have the necessary time to properly evaluate and review the input received to produce a renewed policy within the restricted time frame, and feel that it may be unrealistic to have an effective new policy in place by September for the next school year.

Please note that this Response includes two additional attachments:

- a) SNAC document of policy suggestions that was provided to Subcommittee prior to the development of the draft policy, dated April 17, 2012
- b) Halton District School Board (Ontario), Parent Survey developed by the Special Education Advisory Committee (SEAC)
- c) Also we have referred to the Central Quebec School Board S.N Policy: <http://goo.gl/VruOs>
- d) Also we have referred to the Sir Wilfred Laurier School Board S.N Policy: <http://goo.gl/6T3Vj>

1) Concerns about Policy Development Procedures:

The Special Needs Advisory Committee would like to express several concerns regarding the process by which this draft policy was created.

- a) There was a lack of parental involvement in the development of the draft Policy. Last year, prior to the commencement of this draft policy development, SNAC requested that a SNAC parent member be included on the Subcommittee, but that request was denied. Thus, this Consultation phase is the first, and only opportunity for direct feedback of the parents of students with special needs.
- b) SNAC's request to receive intermediate draft copies of the Policy was denied, so the group did not have the opportunity to provide comments or feedback until this Consultation phase.
- c) SNAC has expressed via our letter dated April 25, 2013 that we feel the timeline for this Consultation phase is too short. Three months is a very short period of time for parents of students' with special needs, whose daily commitments are considerable, and did not provide for sufficient time for careful consideration and input regarding these issues. In addition, scheduling this Policy consultation at the same time as the "Safe and Caring Schools" Policy was particularly problematic. And finally, scheduling an important Policy Consultation at the end of the school year is difficult for all parents due to projects and exams, but is especially difficult for special needs families who are undergoing planning meetings and end-of-year exams that require additional preparation for special needs students.
- d) Finally, SNAC's request for the School Board to email all parents, or at least parents of children with special needs, to inform them that this Policy Consultation was taking place was also refused. It is our opinion that the majority of parents with special needs are unaware that this Consultation is taking place, and that insufficient attempts were made to contact parents and request their input.



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2) Guiding Principles

- a) Parents have expressed concern that the wording of the current proposed draft of the Policy does not sufficiently encourage parental input, feedback and participation.
 - As originally suggested by SNAC prior to the development of this draft policy [refer to document dated April 17, 2012, we suggest once again that the Policy wording “should be overtly parent-friendly and include specific phrases to that effect. [e.g. Central Quebec 5.3.2]”
- b) Parents have also expressed concern about the ongoing commitment of the school board with respect to prioritizing integration/inclusion as a first step.
 - As originally suggested by SNAC prior to the development of this draft policy [refer to document dated April 17, 2012, we suggest once again that the Policy emphasizes that the LBPSB “favours inclusion [e.g: Central Quebec 6.3 and “Methods of Integration” section 12 –Intro paragraph]”
 - In the event that an alternative placement is made, we suggest that the Policy expressly state that the objective is always to reintegrate a student back into a regular classroom.
- c) Two terms were removed from the previous version of the LBPSB Policy, which we recommend reinserting into the policy: “Community Schools” and “Exceptional circumstances”. ie: renew the school boards’ commitment to inclusion within the “**community school**” whenever possible, and to integration/inclusion as a first step, except in “**exceptional circumstances**”.
- d) We recommend that the Policy make specific mention of the school board’s commitment to both the **social and academic** integration/inclusion of students with special needs [refer to point “p” in SNAC’s previous list of suggestions April 17, 2012]. We recommend indicating that students with special needs will be included to the fullest extent possible in extracurricular activities and special events (plays,etc).

3) Groupings

Parents have commented that the intentions of the School Board with respect to Integration and Grouping options are not clearly understood and have resulted in many questions, thus we suggest that this section provide more clarity and include explicit details as to the approach that the School Board intends to pursue moving forward.

It is understood that in certain exceptional cases, grouping of students is the best option to further that student’s progress. However we suggest that integration in a regular classroom setting is the most effective model for the majority of students with special needs.

It is also understood that integration within the regular classroom setting is expensive, due to ongoing budget constrictions and restrictions imposed by collective agreements regarding classroom sizes, weighting of special needs students and oversized classroom compensation. However, SNAC suggests that funding towards the integration of students with special needs should be a priority for the School Board, as nearly all Budget Consultation responses recommended increased funding to Special Needs versus other priorities.

LBPSB is widely recognized as a leader in Inclusive Education. We hope that this will continue to be a focus and priority of the school board moving forward.

As Per the Quebec Education Act, article 235:Every school board shall adopt, after consultation with the advisory committee on services for handicapped students and students with social maladjustments or learning disabilities, a policy concerning the organization of educational services for such students to ensure the harmonious integration of each such student into a regular class or group and into school activities if it has been established on the basis of the evaluation of the student’s abilities and needs that such integration would facilitate the student’s learning and social integration and would not impose an excessive constraint or significantly undermine the rights of the other students.

The policy shall include

- (1) procedures for evaluating handicapped students and students with social maladjustments or learning disabilities; such procedures shall provide for the participation of the parents of the students and of the students themselves, unless they are unable to do so;



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- (2) methods for integrating those students into regular classes or groups and into regular school activities as well as the support services required for their integration and, if need be, the weighting required to determine the maximum number of students per class or group;
- (3) terms and conditions for grouping those students in specialized schools, classes or groups;
- (4) methods for preparing and evaluating the individualized education plans intended for such students.

Specialized schools referred to in subparagraph 3 of the second paragraph are not schools established under section 240.

Considerations/Concerns/Suggestions regarding Groupings:

- a) We suggest that **specific definitions** be provided of “Grouped” classrooms within a school which consist of only students with IEPs, and “Pooled Groups” that displace students from their home school and place them into a grouped classroom at another school.
- b) In addition, as per the Education Act Section **235, #3**, this Policy must provide details regarding the **“terms and conditions for grouping”** that must be met in order for grouping decisions to be made. This Policy must specify the guidelines/requirements/student needs/student behaviours that must be met in order to invoke each type of grouping decision.
- c) SNAC would like to strongly recommend that the Student Services Department (SSD) be consulted and required to approve all special grouped classroom decisions. SSD professionals and special needs consultants have professional experience with various types of special needs, and they also have a broad view of “best practices” that have been successful throughout the school board. Given that there are only 3 grouped classrooms throughout the school board this year and we assume that number should not increase dramatically next year, we suggest that this Policy stipulate that SSD be consulted during the planning and approval phase for every proposed grouped classroom.
 - a. Note that as per the Education Act 187, we suggest that SNAC should also provide a consultative role in the grouping planning process derived from a student’s IEP, and we request that SNAC’s inclusion be added to the Policy. “The committee may also advise the school board on the implementation of an individualized education plan for a handicapped student or a student with social maladjustments or learning disabilities.”
- d) We recommend that the number of grouped classes throughout the School Board be tracked by the Student Services Department, and that the Council of Commissioners be advised.
- e) Groupings should be based on the needs of the student and what is best for the child, as outlined in their IEP, and not based on other factors [staffing availability, funding, Oversized Class Compensation, etc], unless “excessive constraint” on the other children in the classroom can be substantiated.[Refer to Central Quebec, section 12.6][see next point for suggestions on how to substantiate “excessive constraint”] We recommend that SSD provide support to Principals and local school Resource teams in order to offer suggestions regarding balancing the “weighing” of students and aiding with the process of classroom composition planning where students with special needs are present.
- f) It should be shown that all attempts to integrate/include were made, even partially integrated, as per this being the first option as per MELS. Explanation of the attempts made should be **documented** and brought to the ADHOC COMMITTEE, SSD and SNAC.



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Considerations/Concerns/Suggestions regarding Groupings (continued)

- g) If a child is currently successfully integrated (ie: the supports in place have enhanced learning both academically and socially (depending on IEP objectives), a change in placement to a grouping would require **explanation/substantiation**, and the **agreement of SSD and SNAC**.
- h) If a special grouping is created, a clear program with **documented objectives** and **evaluation methods** must be established.
- i) The **effectiveness** of the grouping must be measurable, and **reviewed** (and possibly modified) on a regular basis (every term) in order to be allowed to continue.
- j) In the event that an alternative placement is made, we suggest that the Policy expressly state that the intention is always to reintegrate a student back into a regular classroom.
- k) It is important to ensure that sufficient resources [Resource Teachers and Aides] are assigned to grouped classes to ensure that the individual needs of the students, as outlined in their IEPs, will be met, as they would have been in an Integrated class setting. In other words, grouped classes should not be assigned less Resource time or aide time allocation.
- l) We suggest that the Policy should expressly state that the classroom teacher(s) assigned to a grouped classroom must have the required Special Education Classification.
- m) We recommend that grouped students spend “non-academic” time integrated with other students (gym, art, music, lunch, recess, etc) to the fullest extent possible, with the goal of **reinforcing positive behavior**, as well as **encourage social integration**.
- n) We recommend that grouped classrooms consist of students within the same grade level, or at most one grade level apart.
- o) We suggest that the Policy emphasize the importance of collaboration with parents when making grouping decisions. The policy should expressly indicate that the base requirement is to consult with parents during the **initial planning stage** for grouped classrooms. We also suggest that the school board consider adding parental “approval” as a requirement, however with similar wording for “exceptional circumstances” as per the “Assessments” section of the Policy; ie: in the exceptional circumstance when an agreement is not made, the Director General can make the final decision.
- p) This section should include a reference to the “Complaint/Request for Reconsideration” procedure in an Addendum, as many parents are not aware of this option, or of the procedures to follow.
- q) SNAC would like to recommend that the school board consider consulting with the Center of Excellence for Inclusive Education, to obtain their input and suggestions for this Policy.



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4) IEPs

- a) Introduction – in two places, the text refers to the Principal having the “ultimate responsibility” for the IEP. This goes beyond the terms and requirements of Section 96 of the Education Act, which states that the Principal will ensure that an IEP is “established” and “adapted to the needs of the student”, “with the assistance of the student’s parents”. We feel it is important to encourage cooperative collaboration with parents, thus, we suggest removing the term “ultimate responsibility”, and replace with the following: “Although the principal is responsible for the implementation and periodic evaluation of the IEP, it may be coordinated by a key professional involved with the child (e.g. classroom teacher, resource teacher), and may be facilitated by an aide or technician.”
- b) The Policy should expressly indicate that parents are permitted to invite third-party specialists to an IEP meeting.
- c) We suggest that the standard forms for Elementary and High School IEPs be added as an Addendum.
- d) We suggest that a section outlining the “students’ strengths” be added to the High School version of the IEP standard form, as this knowledge helps to determine appropriate strategies and support.
- e) The Policy should expressly indicate that support staff [daycare, lunch, recess, bus drivers] will be advised on a need-to-know basis about a student’s challenges, as well as effective, proven strategies for supporting that student.
- f) These same support staff members must be trained. Initial training, as well as regular recurring training should be required and the commitment to doing so should be expressly indicated in the policy.
- g) IEP updates/communications should be specific to the child’s goals, and not general comments. Provide more measureable indicators and specific steps of how those specific goals will be attained.
- h) The Quebec Education Act requires that students are **evaluated**. Evaluation of IEP goals, and ways to measure those goals, need to be very clearly indicated on the IEP. IEP goals must be Smart: Specific, Measureable, Attainable, Realistic, Time limited.
- i) We recommend that classroom teachers and resource teachers receive regular ongoing training on how to create individualized goals within each competency.

5) Governing Board considerations:

- a) We suggest that the Policy includes a requirement for specific consideration of Students with Special Needs by Governing Boards when reviewing various policies including the School’s Strategic Plan, rules of Conduct and Safety, as well as in the planning of supervision ratios for Field Trips. [Central Quebec, 12.5]
- b) We suggest that the Policy expressly indicate that parents of students with Special Needs should be allowed to attend and supervise field trips, or not, at their discretion.
- c) We also suggest that the Policy include a guideline and annual training for Administrators and Governing Board Chairs so that they are aware that GB’s must ensure appropriate supervision ratios are discussed and approved for every Field Trip where students with special needs are involved.

6) Sensitization of Staff and other students:

- a) As originally suggested by SNAC prior to the development of this draft policy [refer to document dated April 17, 2012, section 4(i): We suggest that the “Policy include specific measures for “Sensitization of mainstream students to issues and considerations with respect to students in their classroom with Special Needs.” [Central Quebec 13.4, last point], and would like to extend that suggestion to include staff and support staff.



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7) Create Partnerships to Ensure Continuity of Service

- a) While it is understood that the Collective Agreements with teaching staff and aides, and their associated timelines for staffing “priority pools” have an effect on when staffing can be confirmed at the school level, SNAC encourages the school board to create partnerships with the appropriate unions to express the importance of the following, which will be beneficial to the students, their parents, as well as in many cases the staff members themselves:

- Allocation of integration aides earlier in the year, once enrollment is known in the Spring, so that they are already in place when the school starts in the Fall;
- Schedule meetings between parents/student/resource team in the late Summer, before school begins in the Fall, to ensure that the support staff is informed of the student’s development over the summer.

8) Follow-up, Measurement of the Effectiveness of this Policy, and opportunities to provide feedback and make amendments

SNAC would like to emphasize the importance of establishing a means to measure the effectiveness of this Policy on a regular, ongoing basis.

- a) For example, other school boards publish an Annual “Special Education Report” which amongst other things, outlines the number of service requests received (OT, Speech, etc) on a quarterly basis, the wait list for service, and the amount of time that it took to provide the service to the student. Tracking service periods over time is one measurement possibility to consider when examining the effectiveness of Special Education Programs and Services at LBPSB.
- b) It is strongly recommended that parents [and possibly teaching/resource staff] **be surveyed** one year following the implementation of the new policy in order to gauge satisfaction levels and obtain tangible feedback. **A sample parent survey** from the Halton School Board in Ontario is attached to this document, and may be used as a starting point for developing a survey for LBPSB.
- 9) Include the Complaint/Request for Reconsideration Procedure in an Addendum, as many parents are unaware that this option exists, or of the procedures to follow.
- 10) Alternative Schools and Programs
We suggest including a comprehensive list of all Alternative schools and programs, along with a brief description of each, in an Addendum.
- 11) Add discussion on Certification Options:
As originally suggested by SNAC prior to the development of this draft policy [refer to document dated April 17, 2012, section 4(n)]: The Policy should outline all options for graduation, such as Alternate Pathways. [Eg. SWLSB section 13.3]
- 12) All articles from the Education Act with reference to Special Needs should be included in their entirety, in one Addendum to simplify referral, including 14; 15; 96.14; 110.11; 185; 187; 187.1; 196; 197; 213; 234; 235; 265; 277; 450;
- 13) Add the list of MELS recognized codes, and definitions, in an Addendum
- 14) Add the definitions of various staff job descriptions or “roles” in an Addendum



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15) **Mandate of SNAC:**

- a) It is strongly recommended that this policy explicitly outline SNAC's mandate, and establish **specific** means for which SNAC will fulfill its consultative role as per the Education Act article 187 and 187.1.
- b) Specifically indicate in the Policy the means by which SNAC will be informed of the allocation of financial resources for students with special needs, and how SNAC will be enabled to consult on these allocations.
- c) Specifically indicate in the Policy the means by which SNAC will be informed of the details of the requests for Reconsideration related to students with special needs, so that SNAC may be aware of concerns within its community.
- d) Specifically indicate that for all future revisions of the School Board Special Needs Policy:
 - i) Any change in the special needs policy requires consultation with SNAC.
 - ii) A SNAC Parent member will be invited to sit on the policy subcommittee.
 - iii) The SNAC group will receive all intermediary draft versions, and be provided an opportunity to provide comments to the subcommittee.

As per the Education Act 187. The functions of the advisory committee on services for handicapped students and students with social maladjustments or learning disabilities are

(1) to advise the school board on a policy for the organization of educational services to handicapped students and students with social maladjustments or learning disabilities;

(2) to advise the school board on the allocation of financial resources to the services intended for those students.

The committee may also advise the school board on the implementation of an individualized education plan for a handicapped student or a student with social maladjustments or learning disabilities.

1988, c. 84, s. 187; 1990, c. 78, s. 37, s. 54; 1997, c. 96, s. 33.

187.1. Each year, the school board shall inform the advisory committee on services for handicapped students and students with social maladjustments or learning disabilities of the amount of the financial resources available for services intended for those students and of the allocation of those resources in light of the policies defined by the Minister.

The school board shall report each year to the committee and the Minister on requests for reconsideration made under section 9 relating to services for handicapped students and students with social maladjustments or learning disabilities.

2005, c. 43, s. 43.

Thank you in advance for your serious consideration of these suggestions, and for the opportunity to provide input into this very important policy.

Respectfully,

Sandra Buckingham

Sandra Buckingham, Chairperson, Special Needs Advisory Committee of LBPSB

CC: Special Needs Advisory Committee of LBPSB
Central Parents' Committee of LBPSB