

A Special Education Needs Assessment and Intervention Model

**For Mushuau Innu Natuashish School and
Sheshatshiu Innu School**

Prepared for Mamu Tshishkutamashutau Innu Education

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Disclaimer

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Executive Summary

In 2009, Mamu Tshishkutamashutau Innu Education (MTIE) took over the operation of two K-12 Innu schools in Newfoundland and Labrador. The schools follow the provincial guidelines for primary, elementary, and secondary education but the federal government, through Aboriginal Affairs and Northern Development Canada (AANDC), provides the required funding.

As regards the provision of special education services, both federal and provincial guidelines apply. An examination of both sets of guidelines indicates that they are compatible. In light of that, the author of this report closely examined both the province's service delivery model for special education services and MTIE's delivery model. Essentially, the two have very little in common.

In the province's schools, approximately 85% of enrolled students are following the provincially prescribed curriculum in the regular classroom without any special intervention. The other 15% of the students have been provided with comprehensive formal assessments, have been determined to have an exceptionality, and have qualified to receive special education support. Some of that 15% continue to complete the prescribed curriculum in the regular classroom with supports in place; others get modified courses and still others get alternate courses or alternate curriculum. Modified and alternate programming is only available to those students who have exceptionalities and are unable to complete the prescribed programming.

In MTIE's schools, 100% of the students are receiving modified or alternate programming in some or all of their courses. In other words, all students are receiving special education programming by provincial standards. Formal special education support, in this context, is being provided primarily, but not exclusively, in the form of alternate reading programming to approximately 27% of the students. Further to that, teacher reports indicate that up to 73% of the enrolled students need further modifications to, or support with, classroom programming.

The nature and extent of the problems with programming that are being encountered by the students in MTIE's schools necessitate a large-scale intervention. A knee-jerk reaction here might be to begin formal testing of students *en masse* in order to identify and label as many children as possible and then implement the provincial model. However, the students so identified and labeled would most likely already fall among the 27% already getting special education service and, with the limited resources MTIE has, those students would continue to get alternate reading programming. The status quo would be maintained.

To effectively tackle this problem, a much more comprehensive intervention will have to be made. The maximum funding possible, including SEP funding, should be made available to let this process unfold.

Recommendations

Recommendation #1

Hire an Assistant Director of Education - Student Support Services.

Recommendation #2

Hire an educational psychologist.

Recommendation #3

Hire a speech-language pathologist.

Recommendation #4

Hire a social worker.

Recommendation #5

Bring in other specialists (e.g. occupational therapists) on an as-needed, short-term contractual basis.

Recommendation #6

Hire four instructional resource teachers (IRT2s) to teach children with pervasive needs – two to work in MINS, two to work in SIS.

Recommendation #7

Hire one instructional resource teacher for each grade from K to 9 in each school (a total of 20 IRT1s), as well as one instructional resource teacher for high school students in each school (another 2 IRT1s).

Recommendation #8

Hire two instructional resource teachers for each school (a total of 4 IRT1s) to implement alternate programming for the bottleneck of students at the end of junior high school.

Recommendation #9

Hire two counselors to work in each school – one counselor to work with children in primary/elementary, one counselor to work with students in junior/senior high.

Recommendation #10

Hire twelve student assistants, four to work in MINS and eight to work in SIS.

Recommendation #11

Provide MTIE teachers with in-service in a) the provincial Service Delivery Model for Students with Exceptionalities, b) differentiated instruction, c) co-teaching techniques, and d) the principles of inclusion.

Recommendation #12

Provide student assistants with in-service in non-violent intervention techniques and in other required training areas which may be identified by the supervising teachers.

Recommendation #13

Continue to sponsor and fund two students who are attending out-of-province specialized schools.

Recommendation #14

Assign your most competent and dynamic classroom and instructional resource teachers to the primary grades.

Recommendation #15

Continue to use the pod system for literacy intervention in SIS and introduce it to MINS.

Recommendation #16

Extend the pod system into junior high school.

Recommendation #17

Introduce the pod system for numeracy intervention.

Recommendation #18

Establish two Service Delivery Teams for each school – one team for primary/elementary and one team for junior/senior high.

Recommendation #19

In each school, assign one IRT a partial teaching role and a partial coordinator role.

Recommendation #20

Develop policies and procedures for the implementation of student support services to be applied consistently in both schools. These policies and procedures should be derived from, and consistent with, the provincial model.

- a) Job descriptions ought to be developed and implemented for all Student Support Services personnel.
- b) IEPs should be developed for all students receiving direct IRT support.
- c) Formal referral processes should be in place for new students.
- d) To assist in the identification of students who have identified exceptionalities, the process of having comprehensive psycho-educational assessments completed on referred students should be initiated.

Recommendation #21

Use Response to Intervention (RTI) principles to continually monitor, evaluate, and (if necessary) revise interventions.

Recommendation #22

Have regular reporting by IRTs to Coordinating IRTs on the progress of resource programming, and then to the Assistant Director of Student Support Services.

Recommendation #23

Encourage and support the move toward having teachers provide the 'prescribed curriculum' in the regular classroom.

Recommendation #24

Clear lines of communication and protocol for exchange of information should be set up between MTIE's schools and other community agencies that are providing service to MTIE students.

Recommendation #25

Get parents actively involved in their children's education.

1.0 Introduction

Prior to 2007, the schools Mushuau Innu Natuashish School (MINS) in Natuashish, NL and Sheshatshiu Innu School (SIS) in Sheshatshiu, NL were funded and operated by the province of Newfoundland and Labrador. From 2007-2009, the province continued to operate the schools but the federal government took over the funding. Then, beginning in the school year 2009-2010, Mamu Tshishkutamashutau Innu Education School Board (MTIE) took over the operation of these two K-12 Innu schools. The federal government through Aboriginal Affairs and Northern Development Canada (AANDC) continues to provide funding.

Presently, both MINS and SIS continue to follow the program of studies for primary, elementary and secondary schools that is established by the Department of Education for the province of Newfoundland and Labrador. The provision of special education services is expected to be in accordance with provincial guidelines as well. However, MTIE is concerned that its special education service is not up to provincial standards and that MTIE is not adequately funded to do the job.

This report is being completed at the request of MTIE. Its primary purpose is to thoroughly examine the special education service that is currently being offered in MTIE's schools, to compare that to the level and type of service offered in provincial schools, and to make recommendations to MTIE with respect to how they can bring their special education service in line with provincial standards.

In order to complete this task, the writer of this report conducted extensive interviews in person or by telephone with a wide variety of individuals. All the professional staff of both MINS and SIS were interviewed, along with most of the non-teaching staff. All MTIE professional staff at Board level were interviewed, as well as leaders of other community agencies in both Natuashish and Sheshatshiu. Professionals with other school boards in the province and the Director of Student Support Services with the Department of Education were also interviewed. A review of relevant literature rounded out the information gathering process.

This document will begin, first, with a review of federal and provincial (Newfoundland and Labrador) guidelines for the delivery of special education service to determine their compatibility. Second, a comparison will be made of the provincial service delivery model for student support services (i.e. special education) and MTIE's service delivery model. Because the delivery of special education services in any school is inextricably attached to the delivery of general programming for all students, the comparison of models will begin with what is happening in the regular classroom. The process of identifying special needs begins there. Third, a detailed examination of MTIE's delivery model will be provided in order to reveal and discuss the extent to which MTIE's delivery model diverges from the provincial model. Fourth, recommendations will be made to enable MTIE to bring its level of special education services in line with provincial standards. Finally, the estimated annual cost of implementing these recommendations will be presented.

2.0 National versus Provincial Guidelines

At the national level, Aboriginal Affairs and Northern Development Canada (AANDC) has produced a document entitled “High Cost Special Education Program: National Program Guidelines 2013-2014”. This document provides guidelines for delivery of the federal Special Education Program (SEP) as it applies to students who ordinarily live on reserve and who need special education support. These guidelines apply to MTIE students; that is, the students of MINS and the students of SIS.

At the provincial level, the province of Newfoundland and Labrador’s Department of Education provides guidelines for special education programming through its Division of Student Support Services. That division has developed a comprehensive Service Delivery Model for Students with Exceptionalities which clearly outlines policies and procedures to be followed by educators when providing student support services (i.e. special education) to students in the province.

A review of both sets of guidelines reveals that the two are compatible. The only significant difference between the two is that SEP funding cannot be used to enhance programs and services for gifted students. Provincial special education funding can be used for that purpose. Barring that one exception¹, the two sets of guidelines should work well together for MTIE students.

3.0 Newfoundland and Labrador's Delivery Model for Student Support Services

3.1 A Description

In Newfoundland and Labrador, the vast majority of students are following what is referred to as the 'prescribed curriculum'² for the province. Most of these students, including some who have identified exceptionalities, will eventually graduate from high school with Honors, Academic, or General status.

When a student on the prescribed curriculum begins to encounter difficulty and it becomes an area of concern for the teacher, a problem solving "Pre-referral Process" begins at the classroom level. The teacher introduces strategies and practices to address the difficulty, gathers data regarding the success or failure of these interventions, and solicits advice or support where necessary. The parent(s)/guardian(s) are made aware of the concern and the strategies being implemented. If the teacher is unsuccessful in resolving the area of concern, the teacher makes a referral to the school's Service Delivery Team.

The Service Delivery Team (SDT) consists of an administrator, a guidance counselor, representative classroom teachers, and instructional resource teachers. Other professionals (e.g. educational psychologist) may be included, as required. The Service Delivery Team has multiple roles including optimizing deployment of resource teacher support, supporting classroom teachers through the pre-referral process, and reviewing referrals that are made to the Team. If a student is referred, the Team may provide the teacher with further strategies to try with the student or the Team may decide to refer the student for formal assessment. The assessment, if completed, is used to determine whether or not the student has an 'identified exceptionality'³ and to guide decision-making about that student's programming.

Two important implications derive from a student's being assessed and found to have an 'identified exceptionality'. First, the student becomes eligible to receive support from instructional resource teachers. And second, a Program Planning Team (PPT) is initiated to deal specifically with the programming needs of this particular student. Membership on the team may vary, but parent/guardian involvement is considered a critical component of program planning and parents/guardians are an integral part of the program planning team along with classroom/subject teachers. Other members may include an administrator, guidance counselor, educational psychologist, itinerant assessor, educational assessment specialist, speech-language pathologist, instructional resource teacher, and any other professional involved in the student's education. The team will meet annually, with additional meetings as required.

For students requiring accommodations⁴ only, no Individual Education Plan is required. The accommodations are tracked on a Record of Accommodations form. Implementation of the accommodations is the responsibility of the classroom/subject teacher. Instructional resource teachers may provide some support. Accommodations are available for students with exceptionalities in all areas of study whether prescribed, modified prescribed,⁵ or alternate.⁶

For students being provided with modified prescribed courses and/or alternate courses, an Individual Education Plan (IEP) is required. An IEP is a document that records and tracks the education program that is being provided to a student.

Courses are considered 'modified prescribed' when specific course outcomes are changed or deleted, but the intent of the provincially prescribed curriculum is maintained. When courses are modified downward in this way, the number of specific curriculum outcomes significantly changed or deleted must not exceed 50% and no strand or General Curriculum Outcome may be omitted. Modified prescribed courses are taught within the general classroom, at the same time, and by the same teacher(s) as the prescribed curriculum. The classroom teacher takes the lead in the modification, delivery, and evaluation, but may be provided with instructional resource teacher support. For senior high students, modifying courses does not impact graduation requirements but it may impact on a student's eligibility for certain post-secondary programs.

Alternate courses or programs are developed only when the outcomes required are outside the scope of the student's current grade level curriculum. The PPT determines whether the alternate course/program will be offered in the regular classroom or if 'pullout' instruction will be provided. If instruction occurs in the classroom, responsibilities are assigned to both the classroom/subject teacher and the instructional resource teacher. If instruction occurs outside the regular classroom, the instructional resource teacher develops, implements, and evaluates the course. Senior high students generally do not get credit for alternate courses because these courses are usually not curriculum based and they do not contain at least high school level content.

IEPs are also required for students who are placed on an Alternate (Functional) Curriculum. These are students who have moderate, severe or profound impairments in cognition and severe deficits in adaptive functioning to the point that they need a totally alternate educational program. A functional curriculum focuses on four domains: career development, personal development, independent living, and functional academics.

The foregoing is a description of how students in Newfoundland and Labrador become eligible for Student Support Services. Eligible students may then receive direct or indirect support from an instructional resource teacher. There are exceptions, however. Sometimes when students enter school for the first time they already have been diagnosed with an identified exceptionality by health professionals. Through inter-agency meetings, a transition plan is developed and these students have an IEP in place upon entering school. Another exception is when a student with an identified exceptionality transfers from another school. The receiving school can bypass the need for an assessment and proceed with an IEP for that student based on records transferred with the student.

3.2 The Focus

The general thrust of the Service Delivery Model for Students with Exceptionalities in Newfoundland and Labrador is to have as many students as possible follow the provincially prescribed curriculum in as many courses/subjects as possible. To that end, students with exceptionalities are provided with the accommodations needed to allow them to succeed with the prescribed curriculum.

However, when it is deemed by the PPT that a student cannot complete the prescribed curriculum, modified prescribed courses and/or alternate courses (if possible) are provided in the regular classroom. The classroom teacher leads the instruction with the support of an instructional resource teacher. The principles of inclusive education and differentiated instruction are emphasized.

Finally, when the situation necessitates it, some students receive alternate courses or an alternate curriculum through 'pullout' instruction from instructional resource teachers.

In this service model, instructional resource teachers and classroom/subject teachers collaborate extensively and engage in a great deal of co-teaching. Instructional resource teachers are often in the regular classroom assisting students with exceptionalities while the classroom teacher takes the lead role in teaching. There are different models of co-teaching which the teachers may utilize as they find the best fit for their teaching situations. Instructional resource teachers may also spend a large percentage of their time on pullout instruction with small groups or with individuals whose learning needs are the greatest.

The deployment of a school's instructional resource teachers is made by the school's administration in consultation with the school's service delivery team. The goal is to offer instruction in the least restrictive, most inclusive environment respecting the dignity of the student.

3.3 Hierarchy of Professional Personnel

3.3.1 Board Level

A wide variety of individuals at the school board level are directly, or indirectly, involved in providing student support services. These include a Senior Education Officer – Student Support Services, Program Specialists – Student Support Services, Program Specialists for all major programming areas (e.g. Math, ELA), Program Specialists for specialty areas (e.g. Fine Arts, Literacy/Numeracy), Program Itinerants for major programming and specialty areas, Educational Psychologists, and Speech Language Pathologists. The foregoing is a sampling, not an exhaustive list, of the personnel available at the board level to assist schools in the provision of student support services on an as-needed basis.

3.3.2 School Level

Again, at the school level, a wide variety of individuals are involved directly, or indirectly, in providing student support services. Service Delivery Teams include administrators, guidance counselors, classroom/subject teachers, and instructional resource teachers. The team may also include board level employees such as an educational psychologist or an itinerant teacher for the hearing impaired.

The main professional players, however, in the direct delivery of student support services are the guidance counselors, instructional resource teachers, and classroom/subject teachers.

3.4 Professional Personnel Allocations

3.4.1 Board Level

Since 1997, when Newfoundland fully transitioned from a denominational education system to a secular public school system, school boards have undergone numerous revisions in terms of their size and structure. There appear to be no set formulas that dictate the allocation of personnel to school boards. There is an ongoing evolution of structure and personnel based on perceived need and informed by an ongoing dialogue between government and school board officials.

3.4.2 School Level

Schools are allocated one (1) guidance counselor unit for every 500 students enrolled. Schools may be allocated partial units depending on enrollment.

The allocation of instructional resource teachers (or special education teachers, as they are often called in other jurisdictions) is done on a two-tier basis. First, there is a direct allocation of seven (7) instructional resource teachers for every one thousand (1000) students enrolled. In board level parlance, these are often referred to as IRT1s.

Second, there is a pool of instructional resource teachers allocated for students who meet pervasive needs criteria⁷. These teachers are often referred to as IRT2s, and would be synonymous with 'challenging needs teachers' or 'pervasive needs teachers'. According to school board personnel contacted by this writer, the rule of practice for the allocation of these teachers is four (4) teachers for every one thousand (1000) students enrolled. Application can be made to the Department of Education for more of these IRT2 units if the need exists. A missive released by the Department of Education on June 18, 2010 indicates that schools may transition these units to IRT1 service on an as-needed basis⁸.

Essentially then, the Department of Education allocates eleven (11) instructional resource teachers for every 1000 students enrolled. School boards, however, exercise some flexibility on how these units are allocated to schools, depending on needs established by schools within their jurisdiction.

3.5 Additional General Services Provided

- Alternate Format Materials
- Assistive Technology
- Home Tutoring
- Special Transportation
- Student Assistants

3.6 Percentage of Students Receiving Special Education

Percentage of Total Student Enrollment Receiving Special Education Support for the 2012-2013 School Year: 14.7%⁹

4.0 MTIE's Delivery Model for Student Support Services

4.1 A Description

MTIE operates two schools – MINS and SIS. **None** of the students in either school are completely following the province's 'prescribed curriculum' at any grade level. The curriculum is being modified to varying degrees for all students and they are following what would be described in the province as 'modified prescribed' or 'alternate' programming in one or more (often all) of their core subject areas. For the purposes of this document, the programming being provided in the regular classrooms of MINS and SIS will be called 'classroom programming' (as opposed to 'prescribed curriculum').

When MTIE students encounter difficulty with classroom programming, there is no formal referral process in place in either school to determine a student's eligibility for support from instructional resource teachers. Two of the three resource teachers in SIS keep documentation for referrals; all other referrals in the two schools are not documented.

Neither MINS nor SIS has a Service Delivery Team. In both schools, classroom teachers and resource teachers decide among themselves which students will get resource support. Generally, resource teachers provide service to those students identified by the classroom teachers as having the most difficulty with classroom programming. Resource teachers use *rules of thumb* for student selection, such as taking the four weakest students from each class.

There is no requirement for PPT meetings or IEP development in either school. Two of the six resource teachers employed, however, do adhere in varying degrees to the provincial guidelines regarding PPTs and IEPs.

No administrator at the school or at the board level is officially assigned to oversee the development and implementation of student support services programming. The resource team at SIS meets approximately once a month, under the leadership of the guidance counselor, but that team does not perform the roles of a Service Delivery Team. Essentially, there is no consistency between, or within schools, in terms of how the student support service is provided. In reality then, MTIE does not have a 'defined' Service Delivery Model for student support services.

4.2 The Focus

The general thrust of the student support services in both MTIE schools is (a) to identify the students who are encountering the most difficulty with classroom programming, specifically language arts, and (b) to provide these students with alternate reading programs through 'pullout' instructional resource teacher support.

There are some exceptions to that general thrust. These include:

- Seven students are getting some alternate math programming at SIS.

- Nine students who are attending MINS and SIS are classified as ‘pervasive needs’ and are receiving alternate programming specific to their needs.
- MINS offers an alternate skills course (cultural and non-cultural content) for fourteen students in grades 7-9 who are having difficulty functioning in the classroom setting.

4.3 Hierarchy of Professional Personnel

4.3.1 Board Level

There are no personnel at board level who are assigned to oversee or provide direction to student support services programming.

4.3.2 School Level

The main professional players in the direct delivery of student support services are the guidance counselors, the instructional resource teachers, and the classroom/subject teachers.

4.4 Professional Personnel Allocations

4.4.1 Board Level

No personnel allocated.

4.4.2 School Level

Each school has one guidance counselor/student advisor and three resource teachers. That is an allocation rate of one (1) guidance counselor/student advisor for every 300 students, and ten (10) instructional resource teachers for every 1000 students.

4.5 Additional General Services Provided

- Alternate Format Materials
- Assistive Technology
- Special Transportation
- Student Assistants

4.6 Percentage of Students Receiving Special Education

Percentage of Total Student Enrollment Receiving Special Education Support as of March 2014:
27.3%¹⁰

5.0 A Closer Look at MTIE

Clearly, MTIE's schools are not implementing student support services in accordance with the Newfoundland and Labrador Service Delivery Model for Students with Exceptionalities. The reasons for this are many and varied. To understand MTIE's divergence from the provincial model, it is necessary to examine more closely the larger picture of how the MTIE education system works.

5.1 MTIE General Programming

Data collected during March 2014 from the classroom teachers in MINS and SIS reveals the following picture. See Appendices A and B for more details.

5.1.1 Primary, Elementary & Jr. High School

At MINS, **all** teachers from Grades K-9 reported that they anticipate covering, on average, from 35 to 45 percent of the core provincial curriculum in Language Arts in their classes for the school year. The teachers also reported that of the 202 students enrolled in these classes, only 153 attended frequently enough that they could be reasonably expected to pass the courses. Of the 153 regular attenders, only 35 were keeping up with classroom instruction without any special intervention. The other 118 needed further accommodations, modifications, or alternate programming.

The numbers for other core subjects in Grades K-9 (Math, Science, Social Studies, and Health) are quite similar, as well as the numbers for the specialty subjects (Art, Music, and Physical Education).

At SIS the data, although better, is still staggering. **All** teachers from Grades 1-9¹¹ reported that they anticipate covering, on average, from 65 to 75 percent of the core provincial curriculum in Language Arts in their classes for the school year. The teachers also reported that of 271 students enrolled in these classes, only 199 attended frequently enough that they could be reasonably expected to pass the courses. Of the 199 regular attenders, only 82 were keeping up with classroom instruction without any special intervention. The other 117 needed further accommodations, modifications, or alternate programming.

Again, the numbers for other core subjects in Grades 1-9 (Math, Science, Social Studies, and Health) are quite similar, as well as the numbers for the specialty subjects (Art, Music, and Physical Education).

5.1.2 High School

At MINS, the high school teachers report that they anticipate modifying **all** of their courses. Their core curriculum coverage for the individual courses is anticipated to range anywhere from 25% to 90%. Of the 54 students registered, only 13 are regular attenders and 4 or 5 of these require further accommodations, modifications, or alternate programming.

At SIS, the high school teachers report that they anticipate modifying 15 out of 27, or 56%, of their courses. Their core curriculum coverage for the modified courses is anticipated to range anywhere from 60% to 95%. Of the 74 students registered, 50 are regular attenders and 10 or 11 of these require further accommodations, modifications, or alternate programming.

5.2 MTIE Student Support Services

5.2.1 Instructional Resource Support

At MINS, sixty-five (65) students are receiving support from two (2) instructional resource teacher units. These teachers would be IRT1s under the provincial model. The IRT support provided here is almost exclusively alternate reading programming. The one exception is an alternate skills course being provided to a group of fourteen junior high students. Only six of these, however, are regular attenders.

Three (3) additional students at MINS meet the provincial criteria for pervasive needs and are being taught by a qualified IRT2 teacher. That teacher, however, makes a substantial claim that the needs of these three students are beyond what can be met by one teacher.

At SIS, ninety-six (96) students are receiving support from three (3) instructional resource teachers (IRT1s). The IRT support provided for 90 of the 96 students is primarily alternate reading programming. The other six (6) students are categorized as pervasive needs but have their programming designed by one of the IRT1 teachers. There is no qualified IRT2 teacher on staff.

Another three (3) students from the primary/elementary grades have pervasive needs but are non-attenders. There are indications that these students are not attending because the school is unable to provide suitable programming.

Another two students with pervasive needs, one from MINS and one from SIS, are attending specialized schools outside the province.

5.3 Conclusion

The fact that all MTIE students are placed on 'modified prescribed' and/or 'alternate' programming in the regular classroom essentially means that all MTIE students are on programs that would only be made available in provincial schools to students who have identified exceptionalities. Stated another way, all MTIE students are receiving special education programming in the regular classroom.

Further to that, although many of their classroom courses are already modified or alternate, 164 (or 27%) of the 601 enrolled students (MINS K-12; SIS 1-12) are receiving additional support from instructional resource teachers. Further to that again, teachers report that approximately 436 of the enrolled students are not keeping up with classroom programming either because

they are poor attenders or because they need accommodations and/or further modifications. Therefore, approximately 73% of enrolled students need extra help.

Given the extent to which MTIE curriculum is modified (or watered-down) and given that a large majority of MTIE students are struggling with this curriculum, it is the opinion of this writer that ***if MTIE students were to transfer to a provincial school a large majority of them would be assessed, would be labeled as having an identified exceptionality, and would be provided with support from instructional resource teachers (i.e. they would officially be given special education programming).*** This is a strong statement and can easily be misinterpreted. It does not mean that all MTIE students have learning disabilities or disorders. Far from that. The number of students actually having disorders or disabilities (i.e. exceptionalities), in the true sense of those terms, would probably be in the order of the provincial percentage (i.e. 14.7%). However, it is the opinion of this writer that ***standardized testing*** of MTIE students would reveal learning profiles that would justify labeling the students as having exceptionalities. The fact that most MTIE students are struggling with Language Arts programs and are reading significantly below grade level would, in and of itself, promote and/or enable labeling. Labeling then would serve the practical purpose of establishing the students' eligibility for support services. The accuracy of the label, however, would in many cases be highly debatable.

6.0 A Brief Discussion of the Gap and its Implications

Why such difference between student performance in provincial schools and student performance in MTIE schools? A discussion of that question would be long and complex. Issues such as inter-generational trauma, lack of sufficient funding, English not being the first language of most Innu children, poor attendance, alcohol and drug abuse in the communities, children having FASD, and children being in the custody of CYFS would all come under review along with a host of other problems. In the end, we would still be left with the problem of the schools' current programming and what to do about it.

Because MTIE's students are getting a reduced level of programming in the regular classroom and because up to 73% of the students still need further support, a discussion of special education programming cannot be separated from a discussion of MTIE's general programming. And a solution to one cannot be found without a solution to the other.

Furthermore, for several reasons, it is not practical to try and **fully** implement the provincial Service Delivery Model for Students with Exceptionalities in MTIE schools at this time. First of all, classroom teachers and resource teachers are already 'maxed out' trying to stem the tide of students' needs. They are doing the best possible job they can given the high level of students' need and the limited amount of teacher resources. Second, as stated above in Section 5.3 the majority of MTIE students, if formally assessed, would most likely be labeled and found eligible for special education programming. The students currently receiving resource support would continue to be eligible for the service, and many more students would become eligible. The provincial delivery model was developed for, and is working in, a system where 14.7% of the students have special programming needs. It was not developed for a school system like MTIE where almost all students have special programming needs. Nevertheless, having said that, there are elements of the provincial delivery model that could be successfully adapted to MTIE schools in the short term; other elements could be phased in over time.

For MTIE students who have special education needs to really benefit, a much broader intervention is required than simply trying to apply the provincial service model at this time. School wide programming and programming specific to students with special needs must be upgraded simultaneously. ***You can't have one without the other.*** If MTIE is to have schools operating at the provincial standard, there will have to be a long, arduous, and costly upgrading process.

7.0 A Preliminary Note Regarding Cost

MTIE has not entered into any partnerships that compliment the special education program. Efforts to enter into an agreement with the Province of Newfoundland and Labrador under the federally funded Education Partnerships Program (EPP) have been halted. Apparently, the province "...does not wish to enter into any formal agreement with the Board as it relates to the mutual sharing of services".¹²

Since 2009, when the Innu took over operation of their schools, funding for MINS and SIS has been provided through AANDC. MTIE financial statements indicate that AANDC provided MTIE with \$140,885 to carry out its special education programming for the 2013-2014 fiscal year. MTIE's special education expenditures for that year amounted to \$877,871. MTIE accomplished this by taking from other areas of its own budget and by soliciting funds from outside sources.

Both federal and provincial guidelines suggest much larger levels of funding for the provision of special education. Certainly, much greater funding will have to be obtained in order to tackle the special education needs that are so evident in both Innu schools.

8.0 Findings and Recommendations

8.1 Monetary Items

8.1.1 Leadership

The provision of educational services is a very comprehensive undertaking requiring the expertise of many individuals. MTIE, because of its small size (it operates only two schools), has only a few professionals working at board level to carry out this massive task. The development and implementation of a student support services program that will meet the complex needs of MTIE's students is a large enough assignment to necessitate the hiring of an individual who has the knowledge and expertise to do the job. Policies and procedures have to be developed. Leadership and direction has to be given to schools.

Recommendation #1

Hire an Assistant Director of Education - Student Support Services.

8.1.2 Student Support Services Division at the Board Level

School boards throughout the province hire a wide variety of specialists who work out of board office and provide specialized service to schools within the board's jurisdiction. MTIE has no specialized services offered out of board office.

Both MINS and SIS have guidance counselors who have heavy and complex caseloads. In a very real sense, they are isolated in carrying out their mandate. In addition to the provision of counseling services, there is an expectation in Newfoundland (and MTIE) schools that counselors carry out comprehensive psycho-educational testing on selected students. Educational Psychologists are employed by Newfoundland school boards to work collaboratively with counselors in carrying out those roles. If MTIE is to upgrade its service to the provincial level, the services of an educational psychologist will be required.

Recommendation #2

Hire an educational psychologist.

Provincial school boards also engage the services of speech-language pathologists. Natuashish teachers would refer 21 students to a speech-language pathologist if one were available; Sheshatshiu teachers would refer 32 students. Some or all of these students would not only need assessment but also speech-language programming. As well, the speech-language pathologist could possibly work closely with primary teachers in developing language activities to help students cope with the Language Arts program.

Recommendation #3

Hire a speech-language pathologist.

Child, Youth, and Family Services (CYFS) play a very active role in Innu communities. When information was being gathered for this report, there were 62 children ages 0-16 in Natuashish who were in legal custody and another 19 children who were in kinship care. In Sheshatshiu, there were 100 children in legal custody and another 27 in kinship care. Between the two communities then, there were a total of 208 children who were living in out-of-their-own-home arrangements under CYFS care. One hundred and forty seven (147) of these children are of school age. That situation, along with the chronic problem of poor school attendance on the part of some children, indicates a strong need to have a social worker under the employ of MTIE. That person would liaise between CYFS and the schools, and actively work toward resolving the truancy problem.

Recommendation #4

Hire a social worker.

8.1.3 Other Specialists

There are other specialists, for example occupational therapists, whose services may be required from time to time. The level of need however, given the student population, does not warrant full-time positions.

Recommendation #5

Bring in other specialists (e.g. occupational therapists) on an as-needed, short term contractual basis.

8.1.4 Instructional Resource Teacher Support

As discussed in Section 5.2.1, three students who meet the province's pervasive needs criteria are attending school in Natuashish. The instructional resource teacher (IRT2) is unable to meet the programming needs of these students. Six students, who are categorized as pervasive needs, are attending SIS but are having their programming developed by a non-qualified teacher. Another three students with pervasive needs are not attending SIS and the school is not equipped to handle their needs.

Recommendation #6

Hire four instructional resource teachers (IRT2s) to teach children with pervasive needs – two to work in MINS, two to work in SIS.

All the students in MTIE schools are on 'modified prescribed' and/or 'alternate' programming. Of these, up to 73% need further accommodations and/or modifications. This represents an extremely high level of need for special education programming that cannot be met by standard

levels of intervention. Many students, over and above the number who are now getting the service, need 'pullout instruction' in core subject areas (i.e. language arts and math) and most, if not all, would derive benefit from having a resource teacher provide in-classroom support in Science, Social Studies and Health. Implementing co-teaching strategies in this manner is in keeping with the provincial service delivery model. Co-teaching should also serve the dual purpose of providing assistance to children who have special needs and allowing the classroom teacher to upgrade levels of instruction for the better achievers. This, in turn, would allow progress toward providing 'prescribed curriculum' in regular classroom settings for students who can maintain that pace.

Only two MTIE high school students, one in MINS and one in SIS, are receiving resource support. When students reach the high school level, they are left to 'sink or swim'. Unfortunately, too many sink and their education is forfeited.

Recommendation #7

Hire one instructional resource teacher for each grade from K to 9 in each school (a total of 20 IRT1s), as well as one instructional resource teacher for high school students in each school (another 2 IRT1s).

There is a huge drop-off in attendance in both schools as students finish up junior high school (grade 9) and get ready to enter high school (Level I). Teachers in both MINS and SIS report that only 23% of enrolled grade 9 students are regular attenders. Additionally, some junior high students who have not been attending, return to school for a short while and then quit again. Many of those students simply don't have the basic academic skills needed to successfully complete high school, so they fall by the wayside. Their education is forfeited.

This problem can be addressed by having instructional resource teachers develop a bridging program for those students. Learning modules can be developed in language arts and math so that students can develop their basic skills at their own pace. If their attendance is not good, or if they drop out only to return again, they can pick up where they left off and continue on their individualized programs. When they are ready, they can be integrated into regular classroom work (either grade 9 or Level I).

Recommendation #8

Hire two instructional resource teachers for each school (a total of 4 IRT1s) to implement alternate programming for the bottleneck of students at the end of junior high school.

8.1.5 Guidance Service

At first glance, MTIE's allocation of one Guidance Counselor to 300 students seems quite reasonable. It is actually better than the province's ratio of 1 to 500.

However, a closer look at the clientele being served by these counselors reveals a different story. First of all, as discussed throughout this report, a very large number of MTIE students are

struggling academically. Academic difficulties lead to frustrations that frequently become translated into behavioral issues. Students with behavior problems get referred to guidance counselors. Second, as mentioned in the preamble to recommendation #4, there is a total of 147 children under the care of CYFS who are attending MTIE's two schools. One can only begin to imagine the type and depth of issues many of these children are dealing with. Third, there is a reported high incidence of substance abuse among Innu children. Fourth, there is a reported high incidence of suicide ideation among Innu children. These are but a few issues that demonstrate the great need for counseling service for the students of MTIE schools.

School counselors deal with students from ages 5 or 6 up to ages 20 or 21. Obviously the challenges and issues vary widely from one age group to another. MTIE ought to recruit counselors who have different skill sets and who are proficient in working with different age groups.

In order to facilitate MTIE's moving toward the provincial model of student support service, it would also be advisable to hire counselors who are qualified to complete psycho-educational assessments.

Recommendation #9

Hire two counselors to work in each school – one counselor to work with children in primary/elementary, one counselor to work with students in junior/senior high.

8.1.6 Student Assistants

Twelve MTIE students, four in MINS and eight in SIS, have been identified as needing the services of a student assistant.¹³

Recommendation #10

Hire twelve student assistants, four to work in MINS and eight to work in SIS.

8.1.7 In-service

To facilitate the transition from MTIE's current model of service delivery for special education to the provincial model, teacher in-service is going to be required.

Recommendation #11

Provide MTIE teachers with in-service in a) the provincial Service Delivery Model for Students with Exceptionalities, b) differentiated instruction, c) co-teaching techniques, and d) the principles of inclusion.

Student assistants support teachers in meeting severe physical, personal care, and behavior management needs of students. The scope of work for student assistants ranges from intervening in potentially violent situations, to providing toileting care for the physically disabled, to providing intravenous feeding for pervasive needs children.

Recommendation #12

Provide student assistants with in-service in non-violent intervention techniques and in other required training areas which may be identified by the supervising teachers.

8.1.8 Specialized Schools

Two MTIE students with high cost special education needs are attending out-of-province specialized schools.

Recommendation #13

Continue to sponsor and fund two students who are attending out-of-province specialized schools.

8.2 Non-Monetary Items

8.2.1 Early Intervention

In a “Preliminary report on the Innu and English evaluations conducted in Sheshatshiu and Natuashish in 2013-2014”, Lori Morris contends that “Many children in both Sheshatshiu and Natuashish have no clearly defined mother tongue that they can rely on to name things and express their thoughts”¹⁴. Morris goes on to say that “Language development delays are likely contributing to the lack of school success observed in both (Sheshatshiu and Natuashish)”¹⁵. The statistics gathered from both MINS and SIS for this report are consistent with Morris’ findings and clearly indicate that MTIE students begin struggling with the school curriculum immediately upon entering school, especially Language Arts. The early years are most critical for children’s development, and evidence of the young children’s struggle with language and curriculum dictates that MTIE put its best teachers, classroom and instructional resource, into the primary grades.

Recommendation #14

Assign your most competent and dynamic classroom and instructional resource teachers to the primary grades.

8.2.2 Pods

Currently in SIS, primary and elementary students are being separated into ‘pods’ for literacy intervention. For this intervention, each day children are re-assigned from their ‘class’ to the ‘pod’ where literacy instruction is presented at their instructional level. Because of the wide range of student achievement levels and because of the limited number of teachers, individual teachers still have to work with a number of pods at the same time. However, the current pod system is yielding positive results, and these results should become greater with the addition of new instructional resource teachers.

Recommendation #15

Continue to use the pod system for literacy intervention in SIS and introduce it to MINS.

Recommendation #16

Extend the pod system into junior high school.

Recommendation #17

Introduce the pod system for numeracy intervention.

8.2.3 New Directions

When, and if, a new Assistant Director of Education – Student Support Services is hired a great deal of leadership and direction will have to be provided to the professional staff of MINS and SIS. The transition toward the provincial delivery model for student support services will be gradual, and will have to be conducted in phases. To begin,

Recommendation #18

Establish two Service Delivery Teams for each school – one team for primary/elementary and one team for junior/senior high.

Recommendation #19

In each school, assign one IRT a partial teaching role and a partial coordinator role.

Recommendation #20

Develop policies and procedures for the implementation of student support services to be applied consistently in both schools. These policies and procedures should be derived from, and consistent with, the provincial model.

- a) Job descriptions ought to be developed and implemented for all Student Support Services personnel.**
- b) IEPs should be developed for all students receiving direct IRT support.**
- c) Formal referral processes should be in place for new students.**
- d) To assist in the identification of students who have identified exceptionalities, the process of having comprehensive psycho-educational assessments completed on referred students should be initiated.**

Recommendation #21

Use Response to Intervention (RTI) principles to continually monitor, evaluate, and (if necessary) revise interventions.

Recommendation #22

Have regular reporting by IRTs to Coordinating IRTs on the progress of resource programming, and then to the Assistant Director of Student Support Services.

Recommendation #23

Encourage and support the move toward having teachers provide the 'prescribed curriculum' in the regular classroom.

8.2.4 Inter-agency Involvement

Many MTIE students are receiving service from other community agencies such as Child, Youth, and Family Services (CYFS), Primary Health, and Social Health. Cooperation and collaboration among all these agencies is essential if the quality of education service provided to MTIE children is to be maximized. At MINS this is already begun in that inter-agency meetings are being held on a monthly basis at the school.

Recommendation #24

Clear lines of communication and protocol for exchange of information should be set up between MTIE's schools and other community agencies that are providing service to MTIE students.

8.2.5 Parental Involvement

Parents are children's first and most influential teachers. The importance of parents' and guardians' involvement in the education of their children can never be over-emphasized. Activities, such as parent appreciation days and classroom celebrations, can be used to encourage more parental involvement. Parents sometimes may not be comfortable in the school environment but increased exposure should lead to increased comfort and an increased presence.

Recommendation #25

Get parents actively involved in their children's education.

9.0 Estimated Annual Cost of Recommended Intervention

Salaries & Benefits - Board Level

A.D. of Education - Student Support Services (1)	144,900
Education Psychologist (1)	116,350
Speech Language Pathologist (1)	86,250
Social Worker (1)	78,200
Total Salaries & Benefits - Board Level	425,700

Salaries & Benefits - School Level

Guidance Counselors (4)	481,500
Instructional Resource Teachers (26)	2,167,750
Pervasive Needs Teachers (4)	436,042
Student Assistants (12)	282,900
Total Salaries & Benefits - School Level	3,368,192

Program Support Costs

Professional Development	20,000
Assistive Technologies	20,000
Instructional Resources and Materials	30,000
Testing Resources and Materials	10,000
Information Services	10,000
Occupational Therapy Services	7,500
Specialized Schools (hearing & vision impairment)	130,000
Total Program Support Costs	227,500

Sub-Total (before administration costs)	4,021,392
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Administration Costs (10%)	402,139
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Total Cost	4,423,531
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10.0 Endnotes

¹Since SEP funding doesn't cover special education service for gifted students, all references in the provincial model to programming for gifted students will be omitted from this report.

²Prescribed curriculum refers to those courses prescribed and approved by the province's Department of Education. For each course, there is a comprehensive curriculum guide that outlines all of the objectives, general and specific, to be completed in the course.

³Identified exceptionalities include such categorizations as brain injury; cognitive disorder; developmental delay; emotional, mental health and/or behavioral disorder; hearing loss; health disorder; learning disability; pervasive developmental disorder; physical disability; speech and/or language disorder; and vision loss.

⁴Accommodations are adaptations to a student's learning environment intended to address a particular student's needs. This would include such things as changes in physical arrangements in the classroom or changes in instructional strategies. Accommodations are available for students in all areas of study whether prescribed, modified prescribed, or alternate.

⁵Modified prescribed refers to prescribed courses that have had up to 50% of the prescribed course outcomes changed or deleted.

⁶Alternate courses are developed only when the outcomes required are outside the scope of the student's current grade level curriculum.

⁷These are students who meet one of four criteria. The student is on a totally alternate (functional) curriculum, the student has a behavioral issue and represents a threat to himself or others, the student is a high school student whose programming is at least 75% alternate, or the student has a pervasive developmental disorder.

⁸See <http://www.ed.gov.nl.ca/edu/forms/studentssupport/pervasiveneeds.pdf>

⁹See http://www.ed.gov.nl.ca/edu/publications/k12/stats/1213/SUP_12_7.pdf

¹⁰68 of 256 students at MINS plus 96 of 345 students at SIS equals a total of 164 out of 601 MTIE students for a rate of 27.3%.

¹¹When information for this report was being compiled, one SIS Kindergarten teacher reported that she was not following the provincial curriculum in her classroom. The other Kindergarten teacher was on extended leave and could not be reached for an interview. For these reasons, data from SIS Kindergarten classes is omitted from this report.

¹²"Annual Report 2012-2013: Celebrating Achievements and Growth". Mamu Tshishkutamashutau Innu Education School Board. p. 30.

¹³Number of students reported in "MTIE Special Education Program Proposal 2013-2014".

¹⁴Morris, Lori. "Preliminary report on the Innu and English evaluations conducted in Sheshatshiu and Natuashish in 2013-2014". Unpublished report. p. 13.

¹⁵Ibid.

Appendix A

Detailed Statistics re Curriculum Coverage and Student Performance at MINS

Note: All statistics reported in the following charts are taken from direct interviews with the regular classroom teachers and specialty teachers of MINS and SIS.

Chart Legend:

- Column A** Grades K-9. Average estimated percentage of the core provincial curriculum to be covered for the school year.
High School. Estimated percentage of the core provincial curriculum to be covered for the school year.
- Column B** Number of students enrolled for courses in March 2014.
- Column C** Number of regular attenders (i.e. students who by teachers estimates are attending frequently enough that they should be able to pass their course).
- Column D** Number of regular attenders following instruction without special intervention.
- Column E** Number of regular attenders who require accommodations in order to complete the course.
- Column F** Number of regular attenders requiring modifications to the course being taught.
- Column G** Number of regular attenders receiving alternate programming for this course.

Mushuau Innu Natuashish School
Provincially Prescribed Core Subjects - Grades K-9

Language Arts

Grades	A.	B.	C.	D.	E.	F.	G.
K-3	45	84	73	14	57	44	12
4-6	35	71	60	12	41	25	14
7-9	35	47	20	9	11	6	4
TOTALS		202	153	35	109	75	30

Math

Grades	A.	B.	C.	D.	E.	F.	G.
K-3	75	84	73	17	54	31	0
4-6	20	71	60	11	42	35	2
7-9	50	47	27	16	12	11	0
TOTALS		202	160	44	108	77	2

Science

Grades	A.	B.	C.	D.	E.	F.	G.
K-3	55	84	73	11	60	47	0
4-6	35	71	60	13	41	24	2
7-9	65	47	27	15	12	10	0
TOTALS		202	160	39	113	81	2

Social Studies

Grades	A.	B.	C.	D.	E.	F.	G.
K-3	50	84	73	12	59	47	0
4-6	45	71	60	24	30	25	2
7-9	60	47	24	16	8	7	1
TOTALS		202	157	52	97	79	3

Health

Grades	A.	B.	C.	D.	E.	F.	G.
K-3	45	84	73	27	46	16	0
4-6	60	71	60	32	26	16	2
7-9	30	47	27	20	7	6	0
TOTALS		202	160	79	79	38	2

Mushuau Innu Natuashish School
Provincially Prescribed Specialty Subjects - Grades K-9

Phys Ed

Grades	A.	B.	C.	D.	E.	F.	G.
K-3	90	84	58	55	3	0	2
4-6	90	71	71	67	2	2	2
7-9	85	47	38	38	0	0	0
TOTALS		202	167	160	5	2	2

Music

Grades	A.	B.	C.	D.	E.	F.	G.
K-3	60	84	69	49	20	6	0
4-6	40	71	57	37	20	20	0
7-9	40	47	21	6	15	15	0
TOTALS		202	147	92	55	41	0

Art

Grades	A.	B.	C.	D.	E.	F.	G.
K-3	20	84	75	5	45	45	0
4-6	20	71	71	56	15	15	0
7-9	20	47	40	30	10	10	0
TOTALS		202	190	91	70	70	0

Mushuau Innu Natuashish School
Provincially Prescribed High School Courses

Level	Course	A.	B.	C.	D.	E.	F.	G.
I	A	80	21	13	10	3	0	0
I	B	50	29	12	5	7	3	0
I	C	35	27	12	9	3	0	0
II	A	85	28	15	14	1	1	1
II	B	25	8	2	2	0	0	0
II	C	85	28	15	14	1	1	1
II	D	75	24	10	6	4	4	0
II	E	25	8	2	2	0	0	0
II	F	70	8	3	2	1	1	0
II	G	70	8	6	4	2	2	0
II	H	60	17	9	7	2	2	0
II	I	35	9	6	5	1	0	0
II	J	95	30	10	6	4	4	0
II	K	30	12	10	8	2	0	0
II	L	70	18	9	4	5	5	0
II	M	70	20	12	8	4	2	0
III	A	35	9	3	3	0	0	0
III	B	75	24	10	6	4	4	0
III	C	90	8	6	4	2	2	0
III	D	30	6	6	6	0	0	0
III	E	50	6	4	3	1	1	0
III	F	30	4	3	1	2	0	0
III	G	90	4	4	2	1	1	0
Totals			356	182	131	50	33	2

Level 1 registration: 32
Level 2 registration: 11
Level 3 registration: 11

Appendix B

Detailed Statistics re Curriculum Coverage and Student Performance at SIS

Note: All statistics reported in the following charts are taken from direct interviews with the regular classroom teachers and specialty teachers of MINS and SIS.

Chart Legend:

- Column A** Grades 1-9. Average estimated percentage of the core provincial curriculum to be covered for the school year.
High School. Estimated percentage of the core provincial curriculum to be covered for the school year.
- Column B** Number of students enrolled for courses in March 2014.
- Column C** Number of regular attenders (i.e. students who by teachers estimates are attending frequently enough that they should be able to pass their course).
- Column D** Number of regular attenders following instruction without special intervention.
- Column E** Number of regular attenders who require accommodations in order to complete the course.
- Column F** Number of regular attenders requiring modifications to the course being taught.
- Column G** Number of regular attenders receiving alternate programming for this course.

Sheshatshiu Innu School
Provincially Prescribed Core Subjects - Grades K-9

Language Arts

Grades	A.	B.	C.	D.	E.	F.	G.
1-3	65	99	82	43	36	16	24
4-6	75	82	67	25	24	30	24
7-9	65	90	50	14	30	24	13
TOTALS		271	199	82	90	70	61

Math

Grades	A.	B.	C.	D.	E.	F.	G.
1-3	80	99	82	50	30	8	7
4-6	85	82	67	34	23	14	0
7-9	90	90	52	27	23	14	0
TOTALS		271	201	111	76	36	7

Science

Grades	A.	B.	C.	D.	E.	F.	G.
1-3	75	99	82	66	14	4	1
4-6	80	82	67	36	17	20	0
7-9	90	90	46	15	28	3	0
TOTALS		271	195	117	59	27	1

Social Studies

Grades	A.	B.	C.	D.	E.	F.	G.
1-3	80	99	82	69	12	3	1
4-6	65	82	67	36	17	20	0
7-9	65	90	50	22	24	18	0
TOTALS		271	199	127	53	41	1

Health

Grades	A.	B.	C.	D.	E.	F.	G.
1-3	65	99	82	77	4	0	1
4-6	70	82	67	42	11	19	0
7-9	80	90	50	37	13	3	0
TOTALS		271	199	156	28	22	1

Sheshatshiu Innu School
Provincially Prescribed Specialty Subjects - Grades K-9

Phys Ed

Grades	A.	B.	C.	D.	E.	F.	G.
K-3	60	99	84	71	12	1	0
4-6	80	82	71	64	5	5	0
7-9	65	90	50	42	0	8	0
TOTALS		271	205	177	17	14	0

Music

Grades	A.	B.	C.	D.	E.	F.	G.
K-3	85	134	115	99	0	16	0
4-6	85	82	64	54	0	10	0
7-9	55	90	54	44	0	10	0
TOTALS		306	233	197	0	36	0

Art

Grades	A.	B.	C.	D.	E.	F.	G.
K-6	100	216	216	180	25	11	0
7-9	100	90	38	20	15	3	0
TOTALS		306	254	200	40	14	0

Sheshatshiu Innu School
Provincially Prescribed High School Courses

Level	Course	A.	B.	C.	D.	E.	F.	G.
I	A	100	16	12	12	0	0	0
I	B	100	43	35	33	2	0	0
I	C	85	2	2	2	0	0	0
I	D	80	41	23	15	8	2	0
I	E	90	41	23	15	8	2	0
I	F	80	43	20	15	5	0	0
II	A	100	18	18	18	0	0	0
II	B	65	47	30	15	8	7	0
II	C	60	15	15	5	8	2	0
II	D	65	47	30	15	8	7	0
II	E	100	27	16	13	3	0	0
II	F	100	21	21	21	0	0	0
II	G	100	2	2	2	0	0	0
II	H	80	8	8	8	0	0	0
II	I	90	10	10	10	0	0	0
II	J	95	2	2	2	0	0	0
III	A	100	18	18	18	0	0	0
III	B	65	13	12	11	0	0	1
III	C	60	15	15	5	8	2	0
III	D	65	13	12	11	0	0	1
III	E	100	16	12	12	0	0	0
III	F	100	15	14	13	0	1	0
III	G	95	3	3	3	0	0	0
III	H	95	12	10	10	0	0	0
III	I	100	15	14	13	0	1	0
III	J	100	8	7	5	1	1	0
III	K	100	10	9	9	0	0	0
Totals			521	393	311	59	25	2

Level 1 registration: 43
Level 2 registration: 16
Level 3 registration: 15