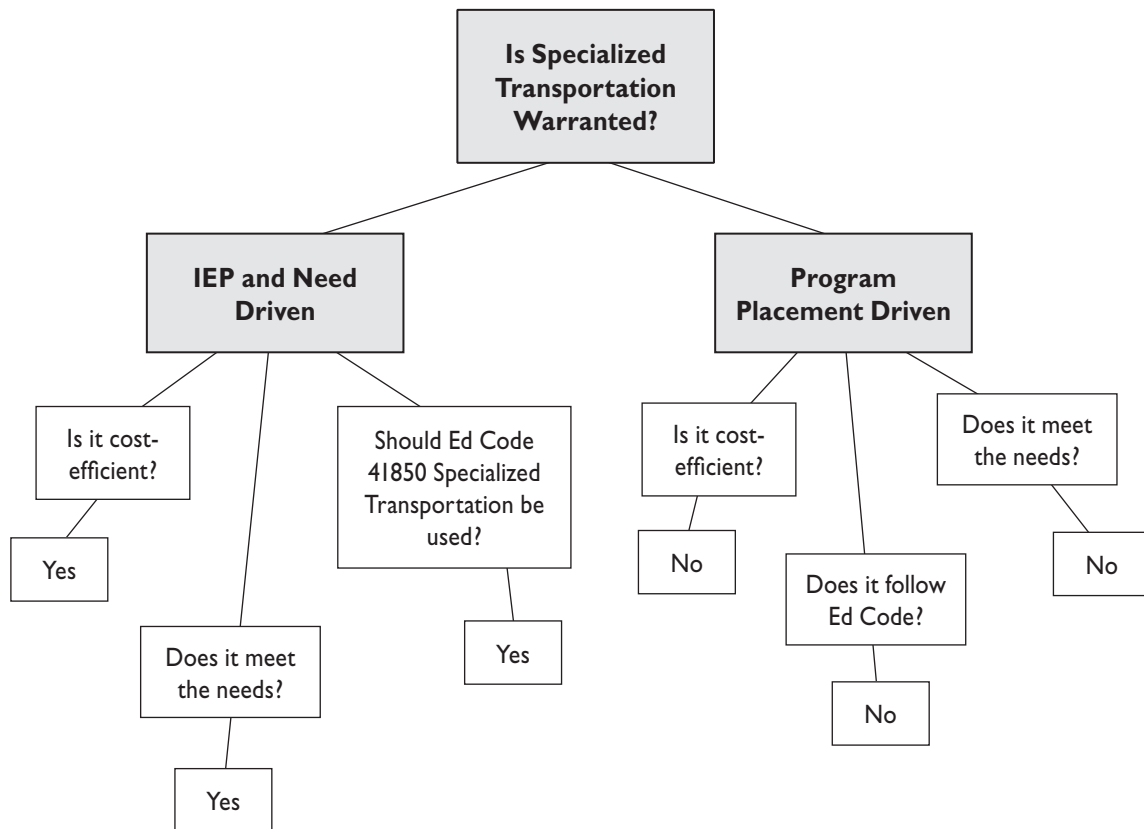


Special Education Transportation

The district lacks written procedures to determine the need for transportation as a related service on a pupil's IEP. In addition, there is no indication that transportation is considered a related service for special education in the procedural manual. Although the Special Education Information System (SEIS) manual provides instructions for entering transportation on the IEP, there is no indication of how that determination is made.

A decision tree is a powerful tool that depicts various decisions and their consequences in a visual graph. A tool such as this could help the district determine the need for transportation as part of a student's IEP. The following is a simple example of a transportation decision tree to help determine if specialized transportation is needed.

Sample Transportation Decision Tree



The district does not provide transportation for any of its special education students who attend nonpublic schools or out-of-district programs. Forty-three special education students are transported by the county office's transportation service at a total cost of approximately \$232,055, or \$5,396 per student, for the 2007-08 fiscal year. The district has a sufficient number of spare buses and bus driver hours to transport these students. It

services departments can maintain accurate employee and budget data as well as support the development of the budget for the subsequent fiscal year.

The director of special services reviews PAN forms that contain recommendations and requests for special education staffing from site principals, specialists, psychologists and other professional staff. The director then submits the PAN form to the assistant superintendent of educational services to initiate cabinet consideration of any potential new position. When a new position for a one-to-one instructional assistant is requested, a special circumstances request form with information justifying the request is attached to the PAN form. Justifying information may include IEP requirements or other data.

In addition to the PAN form and existing processes, the district needs other appropriate forms of communication to notify designated district offices when changes in employee assignments and positions are needed.

In special education, the following circumstances can cause a breakdown in maintaining accurate position control data:

- A child served by a one-to-one instructional assistant moves away from the district and the instructional assistant (IA) position is retained. When this occurs a layoff is almost never required because the IA is reassigned within the special services department; however, occasionally the HR and fiscal services departments are not notified properly.
- An IA is reassigned for any other reason and the HR and fiscal services departments are not notified properly through submission of a PAN.
- An IEP is written in a manner that restricts the district's discretion, flexibility and staffing.
- A teacher is assigned supplemental instructional assistant hours without submitting a PAN. It is not clear who approves the assignment of supplemental hours.

In many cases, the final approval of requests for new positions is substantially delayed, pending cabinet approval. In addition, fiscal services department staff lack an adequate understanding of special education staffing requirements.

Recommendations

The district should:

1. Continue to advocate for enhancement of the position control module to increase its usefulness, particularly the ability to restrict positions in excess of the number authorized.
2. Support collaboration among the HR department, fiscal services department and director of special services to develop and present information and updates to special services staff regarding the proper and consistent use of the PAN form.
3. Develop appropriate forms of communication in addition to the PAN form and existing processes to notify designated district departments of changes in employee assignments and positions.
4. Communicate consistently and clearly the fact that special services staff will give high priority to the proper and consistent use of the PAN form and other appropriate forms of communication to notify designated district offices of changes in employee assignments and positions.
5. Continue to provide effective leadership and direction to special services staff who write IEPs so that they are written to maintain flexibility and maximize the district's discretion in meeting staffing requirements.
6. Encourage collaboration between the directors of special services, fiscal services and HR to ensure that HR and fiscal services staff have an adequate working knowledge of special education staffing needs and requirements.
7. Define the process for authorizing supplemental instructional assistant hours by clearly delineating how the authorization is obtained and who approves it.

Fiscal Overview

General Fund Contribution

In the past, there has been communication between the special services and business departments regarding the special education budget and its development process. However, those discussions were general in nature and the final budget included little input from the special services department regarding detailed revenue and/or expenditure adjustments.

The district now has a new assistant superintendent of administrative services and a new assistant superintendent of education services. It is critical that systems be developed to ensure effective and collaborative communication between these departments. The assistant superintendents and the director of special services will need to work closely together to reduce special education costs. A variety of factors will need to be taken into account including legal requirements, the effect of increased salaries and benefits, compliance issues, and the costs and benefits of increasing or decreasing programs and services while ensuring that students continue to benefit under the maintenance of effort legal requirements found in Part B of IDEA (20 USC 1413 (a)(2)(A)) and implementing regulations (34 CFR 300.230-300.232).

As shown in Table 5, the district’s unrestricted general fund contribution to special education has doubled over the past four years. Staff members indicated that this is a result of salary increases and increases in the cost of health benefits. Regular increases in compensation for certificated staff totaling 13.75% were mutually agreed to during this time period, as well as a one-time salary bonus of 2.5%. In addition, changes in the Individuals with Disabilities Education Act (IDEA) of 2004 led to a bifurcation of education funding for cost of living adjustments (COLA) and growth, resulting in a decrease in revenue. A decline in general education enrollment during this time also affected special education revenue. As a result, the unrestricted general fund contribution will increase as the difference between special education revenue and the costs of salaries for all staff increases.

Table 5: General fund contributions to special education, 2004-05 through 2008-09

| School Year | General Fund Contribution |
|-------------|---------------------------|
| 2004-05 | \$4,123,378 |
| 2005-06 | \$5,156,982 |
| 2007-08 | \$7,569,241 |
| 2008-09 | \$8,039,289 |

The district’s full time equivalent (FTE) special education staffing, including speech, occupational therapists, special education teachers, psychologists and instructional aides, decreased by 21.40 FTEs from 2004-05 to the 2007-08 fiscal year. However, program costs increased by approximately \$1 million over the same four year period. The business department indicated that during this period some costs were charged to special education

that had not been charged previously, though these costs were not specifically delineated or documented.

Table 6: Expenditures for special education salaries and benefits, 2004-05 through 2007-08

| | |
|---|--------------|
| Certificated salaries 2004—05 through 2007-08 | \$3,610,659 |
| Decrease in classified salary 2004—05 through 2007-08 | \$-1,129,669 |
| Increase in employee benefits 2004—05 through 2007-08 | \$956,039 |
| Total Expenditures for Salaries 2004-05 through 2007-08 | \$3,437,029 |

Table 7: Decreases and increases in special education budget, 2004-05 through 2007-08

| | |
|---|-----------|
| Books/Supplies decrease 2004-05 through 2007-08 | \$-20,396 |
| Services/Operating expenses increased | \$814,850 |
| Other outgo (7000s) increased | \$254,049 |

Tracking increases and decreases in the budget will become more transparent after the new administration in the business department establishes clear categories and guidelines that adhere to the California State Accounting Manual (CSAM) for special education, enabling year-to-year comparisons to be made

Recommendations

The district should:

1. Evaluate the impact of salaries and benefits when evaluating the general fund contribution to special education.
2. Review all cost centers to ensure that those that should be charged to special education are being charged, and to ensure consistency from one budget year to the next.
3. Develop systems of communication and decision making among the education services, special services and business departments regarding the budget.
4. Develop a collaborative process for budget development that allows the special services department to provide input and includes the following:
 - A review of expenditures for the current fiscal year.
 - Budget projections for the upcoming fiscal year with a rationale for increases.
 - Common agreement on the total number of FTE staff needed for the projected budget.
 - A final review of the budget to ensure that projected increases are included in the budget for the coming year.

Out-of-District Placements

Nonpublic Schools

Seventeen of the district's students attend nonpublic schools (NPS), including 11 students in schools for the emotionally disturbed and six at a school for language disorders. This is less than 1% of the special education population according to the December 1, 2007 pupil count. Students attending nonpublic schools typically do so because their district does not have an academic program that meets the student's needs, or as a result of due process/mediation. The total number of district students attending a nonpublic school has decreased from 29 in 2006-07.

For the 2008-09 fiscal year, the district's cost to serve its nonpublic school students is \$437,513. This is a decrease of \$371,903 from the actual costs for 2006-07. The current cost for the 11 students in schools for the emotionally disturbed is \$252,500. Although the number of students and the costs have decreased, the district needs to consider the feasibility of either returning any or all of these students to a current district program or developing a new program to serve them.

The following factors would need to be considered when developing a new district-operated program:

- Space for classes.
- Ability to hire appropriate staff.
- An analysis of costs versus benefits.
 - The current cost of serving 11 emotionally disturbed students is \$252,000 per year.
 - Operating one to two classes, each with eight to 10 emotionally disturbed special education students, one teacher and two aides, as well as appropriate support from either mental health or a trained school psychologist, would cost the district approximately \$171,000 per year, per class.
- Transportation costs or savings.
- Specific costs for material and curriculum.
- The advantage of educating students in the district and in the least restrictive environment.
- The advantage of easier transitions to less restrictive programs, when appropriate.
- The potential for prevention of additional NPS placements of emotionally disturbed students.
- The fact that some NPS placements may still be needed.

The district's total annual budget for 2008-09 for nonpublic schools is \$750,000 and includes the following three sub-codes under the general code 015031, Nonpublic Schools.

- 5120 - Subagreements for services
- 5818 - Legal Settlement

- 5823 - Professional Services.

The manner in which items are coded to these sub-object codes makes it difficult to identify specific costs to evaluate cost effectiveness. For example, the cost of independent educational evaluations (IEEs) and the cost of providing additional training for a current psychologist cannot be compared using current SACS coding and would require reviewing printouts of cost details. The district needs to review the specific goal and function format of the SACS code and provide consistent direction regarding the coding of expenditures in the budget development process.

The district's nonpublic agency (NPA) costs may be as much or more than its nonpublic school costs. However, because various NPA costs are contained within each of three sub-codes, they could not be evaluated during this study.

Orange County Department of Education

The district has 13 students in a program for students with cochlear implants that is operated by the Orange County Office of Education. Because programs such as this are very costly, it may not be appropriate to establish district-operated program of this type. These types of decisions should only be made after an extensive evaluation of the program cost and facilities required to make this transition.

The county office also serves 21 of the district's most severely disabled students. These placements are carefully considered and are reviewed annually, thus it may not be appropriate to return these students to a district program or for the district to develop a program for these students. However, the cost of these placements for 2008-09 is estimated to be \$1 million and alternate placement may need to be reconsidered. Factors to consider are similar to those enumerated above for a new district-operated program, but include additional required support such as nurses. The number of students requiring specific costly curriculum or materials would also need to be taken into account. If more than a few individual students were returned to the district, the legal requirements of program transfer would be in effect and would have to be adhered to.

The county office also encumbers \$750,000 per year of the district's funds for the services provided to the district's students. This is unique to Orange County because of errors in the original county AB 602 allocations and should be taken into consideration when comparing the district's unrestricted general fund contribution figures with districts outside of Orange County. This cost will be incurred regardless of the number of students.

Centralia Elementary School District

Twelve of the district's students attend the Centralia Elementary School District's deaf and hard of hearing program in accord with a memorandum of understanding (MOU), at an estimated total cost of \$400,000 per year. Because of the number of students in this program, the cost effectiveness of a developing a district-operated deaf/hard of hearing program must be considered. In addition to the factors enumerated above for consideration when developing a new district-operated program, the district must consider appro-

priate peers for these students, parental concerns, and legal requirements, particularly when transferring an entire program from one district to another.

Service to Students from Other Districts

The district provides a program for its 12 visually impaired (VI) students, three of whom are from neighboring districts, in accord with an MOU. The MOU covers the teacher, aides, Braille transcriber and orientation and mobility specialist. Revenue from this program is approximately \$108,000 per year. The orientation and mobility specialist's entire salary is charged to this program, though a portion of this individual's time is spent seeing students in other districts as an itinerant VI specialist. This inconsistency in the account code process needs to be reviewed with the district's business office.

Recommendations

The district should:

1. Develop sub object level codes or re-evaluate the goal and function codes of the SACS Code under the nonpublic schools code so that specific costs can be identified.
2. Review specific costs for the following:
 - Independent educational evaluations
 - Private speech services
 - Private occupational therapy services
 - NPS and NPA placements, to determine what additional services could be developed by the district to reduce these costs.
3. Compare current NPS costs for emotionally disturbed special education students with the cost of a district-operated program of one or two classes for these students to determine if such a program should be developed.
4. Review all county office-operated programs to determine if any students could be returned to a current or newly developed district program.
5. Compare current costs for the Centralia Elementary School District's program for deaf and hard of hearing students with the cost of a district-operated program of this type to determine if a district-operated program should be developed.
6. Review the costs for the orientation and mobility specialist to determine if additional revenue would be generated by dividing this position's salary, benefits and travel costs between the district's class for VI students and the itinerant services provided. If additional revenue would be generated, develop a separate MOU with neighboring districts to cover some of the costs of this position.

Psychologists' Salaries

The district's psychologists reportedly spend approximately 15% of their time on duties related to the GATE program. Many California school districts charge approximately 25% to 50% of their psychologists' salaries to the general fund because some of their duties and initial assessments are general education functions. Charging a percentage of psychologists' salaries to the general fund would not reduce the district's overall costs, but would reduce the perception that the general fund is contributing in large degree to special education. This change would also increase efficiency and effectiveness by allowing the psychologists to participate in the duties for which they are trained.

Recommendations

The district should:

1. Reassign a percentage of the school psychologists' salaries to the general fund through the SACS coding system, including costs associated with the GATE program.

Legal Costs

The district's legal costs related to special education have been in the \$200,000 range for each of the past two years, which is in line with the costs experienced by other districts in Orange County. Orange County is a litigious area and has several law firms that specialize in special education litigation. However, the number of filings in relation to autism indicates that a review of these costs is warranted.

Table 8: Total and autism-related due process cases and costs, 2006-07 through 2008-09

| School Year | Total Due Process Filings | Autism Cases | Costs |
|--------------------|----------------------------------|---------------------|---------------------|
| 2006-07 | 12 | 10 | \$230,766 |
| 2007-08 | 9 | 8 | \$191,998 |
| 2008-09 | TBD | TBD | \$200,000 Projected |

Recommendations

The district should:

1. Review due process filings in the area of autism to determine what services and programs would be cost effective and prevent further due process filings.

Student Identification and Disability Eligibility Category Data

The total number of district students identified as needing special education services has remained relatively stable over the past three fiscal years; however, there have been significant changes in some eligibility categories. The June 2005 and June 2008 numbers were used for the comparison detailed in Table 9 because they show all students who were enrolled in special education during the year, including those who were initially placed, exited special education, or moved into or out of the district.

Table 9: Special education enrollment increases and decreases by eligibility category

| Eligibility Categories | June 2005 | June 2008 | Change in Number of Students | Percent Change |
|--------------------------------------|------------------|------------------|-------------------------------------|-----------------------|
| Total Number of Special Ed. Students | 3054 | 3038 | -16 | -.5% |
| Mental Retardation(MR) | 153 | 113 | -40 | -26% |
| Hard of Hearing (HH) | 14 | 27 | +13 | +93% |
| Speech/Language (SLI) | 1678 | 1683 | - 5 | - .2% |
| Visually Impaired (VI) | 20 | 19 | - 1 | 0 |
| Emotionally Disturbed (ED) | 15 | 14 | - 1 | 0 |
| Orthopedically Impaired(OI) | 40 | 33 | - 7 | -17% |
| Learning Disabled (SLD) | 900 | 723 | -177 | -19.6% |
| Multiply Disabled (MD) | 14 | 17 | + 3 | +21% |
| Autism | 145 | 284 | +139 | + 95.8% |
| Traumatic Brain Injury (TBI) | 7 | 4 | - 3 | - 42/8% |

The comparison in Table 10 shows a large increase in students in the autistic, hard of hearing and other health impaired categories. The increase in the hard of hearing category is increasing out-of-district costs for programs operated by the county office and the Centralia Elementary School District, and the increase in autism category is increasing the cost of district-operated programs.

The decrease in students identified as mentally retarded may be mitigating some of the increased costs for county placement and is significant because in FCMAT’s experience this number tends to remain fairly stable. The decrease in students identified as learning disabled is also important in planning for special education teacher staffing and is more common because the current trend is to implement research-based instruction prior to a referral to special education.

The number of students in the speech/language category is considerably higher than expected. This number includes the preschool students, who are primarily eligible under this category. However, the large difference between the number of students in the speech/language category and the number identified as learning disabled is not typical.

A review of student IEPs that have speech/language as the eligibility category or that include speech services is warranted to help determine the accuracy of this eligibility and the need for speech services.

Because of these anomalies, FCMAT compared the percentage of the district’s special education students in each category with countywide and statewide percentages, based on December 2007 data, which is the most recent available for Orange County and the state. This comparison is shown in Table 10. The categories of deaf and deaf/blind were not included because the district does not have any students in these categories.

Table 10: Percentage of district, county and state special education students by eligibility category

| Eligibility | Anaheim City School District | Orange County | California |
|-------------------------|-------------------------------------|----------------------|-------------------|
| Mental Retardation | 4.2% | 5.4% | 6.4% |
| Hard of Hearing | .5% | 1.3% | 1.2% |
| Speech/Language | 54.5% | 31% | 26% |
| Visually Impaired | .7% | .6% | .6% |
| Emotionally Disturbed | .4% | 2.6% | 4% |
| Orthopedically Impaired | 1.1% | 2.2% | 2.2% |
| Other Health Impaired | 4% | 9% | 7% |
| Learning Disabled | 23.8% | 35% | 44% |
| Multiply Disabled | .5% | 1% | .8% |
| Autism | 10.3% | 11% | 7% |
| Traumatic Brain Injury | .1% | .2% | .3% |

From a statistical perspective, unified school districts and high school districts tend to have a higher percentage of students in the emotionally disturbed and learning disabled categories than K-6 elementary school districts, while elementary school districts may have more students in the autism and other health impaired categories. There is little difference among districts in the percentage of students identified with low-incidence disabilities such as hard of hearing, visually impaired, orthopedically impaired, traumatic brain injury and mental retardation.

Even for a K-6 elementary school district, Anaheim City has an unusually high percentage of students identified as speech/language impaired, and a lower than usual percentage of students identified as learning disabled. The fact that the district and countywide percentages of students with autism are higher than the statewide percentage is also an indicator of higher program costs.

The period two (P-2) J18-19 Attendance Report for 2007-08 indicated that the district’s allocation for low-incidence services was \$25,000, which is lower than typically found

in comparable districts. Every student with a low-incidence disability needs to be entered into the California Special Education Management Information System (CASEMIS) with the low-incidence disability as either the primary or secondary disability so that these funds can be maximized.

The percentage of the district's students identified as hard of hearing is lower than the countywide and statewide percentages. This may indicate that this eligibility category will continue to grow and needs to be considered in long term planning.

Recommendations

The district should:

1. Review all IEPs that have speech as the eligibility category and/or that include speech services to determine the accuracy of the eligibility and the need for speech services.
2. Review all IEPs that have multiple disabled as the eligibility category to ensure that one of the eligibility criteria is a low-incidence disability.
3. Consider the possibility of growth in the number of students identified as hard of hearing when making long term plans.

Medi-Cal and Medical Administrative Activities (MAA)

The district received \$34,793 in Medi-Cal reimbursements in 2007-08 fiscal year. This amount is significantly lower than expected in light of the number of students undergoing psychological evaluations or being assessed for speech, occupational therapy or physical therapy services.

District staff indicated that the Medi-Cal reimbursement is low because many families do not give the district permission to bill Medi-Cal. The district includes a general consent form in the back of the school packet sent to parents, but if a parent does not return the signed permission agreement, Medi-Cal cannot be billed. This is not an effective method of securing permission. Many families may not sign because they do not understand what is being agreed to, but would probably sign if given a personal explanation. Obtaining parent permission when special education assessment plans are signed or at IEP meetings would help resolve this issue.

The district received \$90,000 in MAA funds for 2007-08. Site administrators have not been included in the MAA survey. There was a plan to include site administrators in this year's survey, but this was changed because of the possibility that MAA funding would be eliminated in April 2009. Significantly higher MAA reimbursements occur in districts that include all administrators and encourage appropriate reporting activities to be held during the survey period.

Medi-Cal reimbursements have been spent on a variety of activities, including the Medi-Cal audit, conferences and training. MAA funds have also been allocated to the audit and to some salaries, benefits, mileage and counseling.

Salaries for some of the district's health aides are not billed to Medi-Cal because they are coded to federal programs. These types of account code inconsistencies need to be reviewed with the district's accounting staff in the business office.

Recommendations

The district should:

1. Obtain Medi-Cal parent permissions when special education assessment plans are signed or at IEP meetings.
2. Include all administrators in the MAA survey.
3. Encourage appropriate MAA activities throughout the district.
4. Evaluate all areas that are currently being billed under Medi-Cal to determine if any additional areas could be billed (e.g., behavioral assistants).
5. Review the salaries for all staff who provide services that are eligible under Medi-Cal to ensure that all eligible MAA and Medi-Cal activities are being billed.
6. Review MAA and Medi-Cal expenditures to ensure that the majority of the funds are expended for services, activities and staff that generate Medi-Cal or MAA funds.

Transportation

Ridership

In 2007-08, the district provided transportation services for more than 3,000 students, or approximately 15% of the total student population. The 2007-08 state transportation report (TRANS report) indicates that the district's transportation department has a considerable workload managing 30 special education bus routes for 380 special needs students, most of whom receive curb-to-curb service, and 25 regular education home-to-school bus routes for 2,618 students. The department also serves a growing number of students, currently more than 200, who need rapid scheduling and transport to overflow sites.

Student passenger counts reported by staff indicate that the number of students transported has increased to 3,700 regular education students and 439 special education students for a total of 4,139 students transported during the current 2008-09 school year. The increase in special education transportation totals 59 students, or 0.3% of the district's total enrollment, and appears to be substantiated by students' individual education plans (IEPs). The increase in regular education transportation totals 1,082 students, or 5.7% of the district's total enrollment. The accuracy of reported number of regular education students is not certain because it was difficult to verify the accuracy of regular education passenger counts, which are reported on school bus drivers' time sheets and consist mainly of rounded numbers, which is unusual compared to industry standard reporting practices.

Recommendations

The district should:

1. Develop a more accurate method of tracking and accounting for ridership.



Department Structure, Staffing and Service

Table 11 shows the district’s current transportation department staffing.

Table 11: Current Transportation Department Staffing

| Title | Number of Positions | Filled Positions | Vacant Positions |
|-------------------------------------|---------------------|------------------|------------------|
| Director | 1 | 1 | 0 |
| Operations Supervisor | 1 | 1 | 0 |
| Driver Instructor | 1 | 0 | 1 |
| Transportation Services Coordinator | 3 | 1 | 2 |
| Vehicle Maintenance Supervisor | 1 | 1 | 0 |
| Administrative Secretary | 1 | 1 | 0 |
| Clerical Support | 1 | 1 | |
| Vehicle Mechanic | 4 | 4 | 0 |
| Mechanic Assistant | 1 | 0 | 1 |
| School Bus Driver | 69 | 69 | 0 |
| Substitute Drivers | 14 | 14 | 0 |

The transportation director is responsible for overseeing the entire transportation program, including student transportation services and the district’s vehicle fleet. The district recently upgraded its dispatcher positions to transportation services coordinator positions to allow for shared supervision of the large driving staff. However, the resolution of a personnel matter has left two of the three transportation services coordinator positions vacant, though the district is filling these temporarily with interim dispatchers.

The driver instructor position has not been filled with a permanent employee for approximately two years. As a result, the workload for this position has been shared among the operations supervisor, the director and occasionally two drivers who have state, department of education and driver instructor certificates. Staff members indicated that the quality and appropriateness of the training being provided by the two drivers with instructor certificates is questionable and lower than they would like. Without a filled instructor driver position, ensuring that the district has appropriately licensed school bus drivers in accord with legal mandates requires a very heavy added workload that places undue strain on the department’s limited resources.

The district does not appear to have a functioning accident review committee to examine accidents and make recommendations for remedial driver training. In addition, driver ride checks are not routinely performed to ensure that driving standards and defensive

driving techniques are being practiced and efficient routes maintained. The transportation department has significant challenges and weaknesses in the area of school bus driver instruction, creating the potential that routine inspections by the CHP motor carrier division or the CDE School Bus Driver Training program will find that instruction and the maintenance of records are below satisfactory levels. To date, driver safety and CHP motor vehicle inspections have been satisfactory.

The district's school bus drivers must meet all school bus licensing requirements established by the California Department of Motor Vehicles (DMV), California Highway Patrol (CHP) and California Department of Education (CDE). Drivers need access to required in-service and license renewal training. A permanent instructor is needed to perform ride checks, and to ensure the timely maintenance and filing of required driver training records and state forms T-01 and T-02. The instructor could also design and facilitate regular safety in-service programs. The size of the district's transportation program makes it eligible to have up to three CDE-trained driver instructors.

The district's current collective bargaining agreement with the school bus drivers guarantees drivers a seven-hour work day and either a 10-month or 12-month contract. This guaranteed work time exceeds the amount the district needs to provide adequate transportation services. The excess amount is 55 driver hours per day for regularly assigned route drivers and approximately 14 driver hours per day for permanent substitute drivers, for a total of 69 hours of driver time per day that is used as standby or non-driving time. In addition, drivers guaranteed a seven-hour work day receive overtime pay if they work an eighth hour, per the collective bargaining agreement.

The department's single transportation services coordinator's normal duties and responsibilities have become more difficult to accomplish because of the size of the department and the number of vacant positions. This position is responsible for attempting to schedule effective and timely transportation of students to overflow sites, supervising and scheduling the two interim dispatchers, and supervising effective routing for the driving staff to ensure that the district is making the best possible use of its buses and drivers. The district needs to immediately fill the two vacant transportation services coordinator positions.

Too many tasks are assigned to the operations supervisor position. This position cannot effectively supervise the demands of 30 special education school bus drivers, 25 regular education school bus drivers, 14 substitute bus drivers, and three transportation services coordinators who have tremendous challenges of their own with the district's bell schedules, transport of students to overflow sites, and regular and special education routing. Student and driver safety should be paramount when assessing additional supervisory positions.

With a total of 55 bus routes, the district has a moderate to large sized transportation program and could consider adding one operations supervisor. It is a common practice to assign one such position to special needs route scheduling and driver supervision, and another similar position to regular education route scheduling and driver supervision. The

supervision of driver instructors and oversight of field trip scheduling could be assigned to the operations supervisor that is responsible for fewer bus routes.

During the team’s interview process, many school sites expressed the perception that student transportation services are less than satisfactory. Concerns expressed by site personnel, district administrative staff and a sampling of special needs and regular education parents indicate that buses consistently run late and have incorrect routing or student information. The transportation department’s leadership personnel also reportedly do not return telephone calls or e-mails in a timely manner; therefore, some school site staff communicate directly with transportation scheduling support staff, who appear to be more responsive.

Recommendations

The district should:

1. Immediately recruit for and fill the vacant driver instructor position, and consider the benefits of creating a second permanent driver instructor position.
2. Study the potential cost savings if the district were to successfully negotiate a reduction in guaranteed driver work hours to better align hours with actual student transportation needs.
3. Immediately advertise for and fill the two vacant transportation service coordinator positions
4. Consider creating and filling an additional transportation operations supervisor position.
5. Require transportation leadership to respond to school site inquires in a timely manner and develop an open dialogue with interested parties regarding transportation challenges.



Bell Schedules

The district's bell schedules present a challenge for the transportation services program. The district's morning tiered bell schedules are 45 minutes apart, which is too close to allow for timely drop-off to the second-tier school sites or for irregularities such as traffic, weather or specific student needs. As a result, additional buses are sometimes required, or student pick-ups are delayed. In the afternoon, all sites have an earlier dismissal for grades 1-3 and a later dismissal for grades 4-6; however, there is not adequate separation between the earlier and later dismissals, and the bell times for each dismissal vary from site to site.

Additional causes of ineffective transportation support include weekly instructional planning days, irregular dismissal periods, and uncoordinated minimum days without adequate separation of dismissal times. The district also holds an instructional planning day every Wednesday, for a total of 31 such days. All school sites dismiss all grade levels earlier on these days.

The district's unexpected need to transport a large and continually growing group of more than 200 students to overflow sites creates an additional burden on the transportation department. These are students who have moved into the district, contributing to its growth, but whose local neighborhood schools have reached capacity and who therefore must be transported to another school site. Scheduling the transportation of students to overflow sites is similar to scheduling transportation for individual special needs students in that it requires individual handling and planning by department staff.

Kindergarten sessions usually overlap in the middle of the day; however, some school sites dismiss their later kindergarten classes earlier than grades 1-3, which means that either an additional bus must be provided or students must wait for a bus to return to the school site to pick them up. On instructional planning days, kindergarten classes dismiss early like the rest of the school; however, in most cases their early dismissal time differs from the early dismissal times for both grades 1-3 and grades 4-6.

In addition to the regular bell schedule and an instructional planning day schedule, the district has 11 minimum days. However, because these minimum days are not scheduled on the same days district-wide, the transportation department is not able to coordinate effective and timely transportation service for the sites that have a minimum day and the sites that are on a regular schedule the same day. A coordinated district-wide minimum day schedule would help resolve this issue and provide additional cost savings to the district. There are also occasions when the multi-track year-round schedule ends on a minimum day schedule at some sites and coincides with a Wednesday instructional planning day schedule at other sites, which requires additional bus runs.

Any school district that offers a high level of transportation support services must ensure that its transportation program has the bus fleet and labor resources to address school start and end times for regular days, minimum days and staff development days. To ensure timely and effective transport of students using the least amount of district resources, most districts institute a tiered bell schedule with sufficient travel time between the first-

second- and sometimes third-tier start and dismissal times to allow the transportation department to operate with the fewest possible buses and drivers. Based on the 69 hours of available driver time per day referenced above, implementing this type of tiered bell schedule could result in a substantial cost savings for the district.

Scheduling minimum days and professional development days can be a challenge because the same staggered scheduling approach must be used to ensure that additional transportation resources are not required. A lack of coordinated dismissal times or a shortened time between different dismissal bells can cause buses to be late. This can be alleviated by providing additional staffing and equipment at those particular times, but this is typically both costly and difficult to schedule.

Recommendations

The district should:

1. Review their current bell schedules for all school sites that receive transportation services to ensure that a one-hour window exists between all first- and second-tier start and dismissal times.
2. Review the effectiveness of dismissing grades 1-3 and grades 4-6 at separate times.
3. Plan and implement a coordinated district-wide minimum day schedule for all school sites to enable effective transportation coordination and support. Ensure that the transportation department participates in and concurs with this plan.
4. Review the practice of dismissing kindergarten students at a different time from other grades in the afternoon.

Routing

For 2008-09, the district reportedly increased its nontransportation zones and eliminated one special education and six regular education daily route buses. If this information is accurate, it indicates increased efficiency in the district's use of school buses this year. However, interviews and data indicate that service remains less than satisfactory, with numerous late buses in the morning and at dismissal times for grades 1-3, 4-6 and some kindergarten students

Transportation staff schedule bus routes manually with the assistance of Map Point, a software system that only allows the operator to plot stops on an electronic map. The system does not optimize or electronically route stops based on efficiency criteria. The district previously used an electronic routing system called VersaTrans, but this was never fully implemented or used to its full extent by staff.

Interviews revealed that many transportation department staff experience a high level of frustration in attempting to manage and schedule their bus routes. Staff members understand the extreme difficulty of supplying sufficient and dependable transportation under the district's current bell schedules and routing methods. The vacancies in key permanent transportation staff positions and the excessive responsibilities and duties assigned to the operations supervisor result in an inability to appropriately supervise routes and staff and thus add to this sense of frustration.

The district has recently purchased an industry-standard transportation software system called Trans Track, which has modules for school bus routing, vehicle maintenance tracking, field trip scheduling and driver training record maintenance. However, only the vehicle maintenance module of the Trans Track system has been implemented to any extent. Most school districts with transportation programs of comparable size to Anaheim City use some type of electronic routing software to make routing quicker and easier and optimize routes to ensure the greatest efficiency based on parameters the district inputs. This type of software also enables transportation schedulers, dispatchers and supervisors to rapidly provide cost scenarios in case of boundary changes, new school openings or increases in nontransportation zones.

Although the district's students-per-bus load factor ratios do not seem to differ substantially from industry standard practices, there are indications that the current routing design is not meeting students' needs. In particular, buses are frequently late at dismissal time because of the district's varied bell schedules. However, because of these schedules and the district's inability to analyze routing electronically, it is difficult for FCMAT to state with certainty that fewer daily bus routes and greater efficiency could be achieved with an improved staggered bus schedule.

To correct the problem of afternoon buses arriving at and leaving school sites late without changing the current schedule, FCMAT estimates that the district would need to run an additional nine buses on instructional planning days, seven buses on single-track minimum days, seven buses on multi-track minimum days, and nine to 10 buses when multi-track and single-track days are scheduled. This approach is clearly not feasible

because additional routes would involve varied and inconsistent scheduling and service at a high cost. Employing staff to perform the work without substantially increasing guaranteed contracts would also be challenging. Although FCMAT is not recommending these added routes and services, the example highlights the tremendous challenges faced by the district's transportation program.

Making full use of the existing routing software should enable the district's transportation staff to provide routing scenarios for different bell schedule options, including travel times and the number of buses needed.

A specific routing plan also needs to be designed for the large number of students needing transportation to overflow sites. This might be accomplished by designing some type of centralized routing using one or two large buses to stop at all affected school sites to pick up and drop off these students. This routing would resemble that of a mass transit type of bus that covers the entire district. Having one or two such routes in place would allow for quick routing of identified students, substantially reducing the long wait periods experienced currently. However, this would not be possible with the current varied dismissal times among sites for instructional planning days, minimum days, kindergarten, grades 1-3 and grades 4-6.

Some school bus route sheets lack the most current routing directions, and some lack information about the newest special needs students on a driver's route. This could result in erroneous routing by substitute drivers following inaccurate directions or information about special needs students. This situation creates the potential for large routing errors and compromised safety for special needs students. A central electronic routing system could greatly improve the district's routing by creating directions for a driver to follow between central school bus stops for regular education students, as well as individual curb-to-curb stops for special needs students. If an electronic routing program is implemented, the district will need to establish policies, staff development training and standard practices that require drivers to follow documented directions.

Recommendations

The district should:

1. Immediately implement one of the electronic routing software packages owned by the district.
2. Investigate, study and recommend a district-wide bell schedule that meets the needs of the instructional program and can be effectively and efficiently supported by the transportation program.
3. Create one or two transit style district-wide routes to quickly and efficiently transport students to and from overflow sites.
4. Create and implement a policy that requires the drivers to follow district-provided route sheets.

Appendices

Appendix A: Legal Code Sections

Appendix B: Study Agreement

Appendix A

Legal Code Sections

California Education Code

Section 56341 (a) (b) (1-7)

56341 (a) *each meeting to develop, review or revise the individualized education program of an individual with exceptional needs shall be conducted by an individualized education program team*

(b) *The individualized education program team shall include all of the following:*

- 1) One or both of the pupil's parents, a representative selected by the parent or both
- 2) Not less than one regular education teacher of the pupil, if the pupil is or may be participating in the regular education environment. If more than one regular education teacher is providing instructional services to the individual with exceptional needs, one regular education teacher may be designated by the local educational agency to represent the others.

The regular education teacher of an individual with exceptional needs to the extent appropriate, shall participate in the development, review, and revision of the pupil's individualized education program, including assisting in the determination of appropriate positive behavioral interventions and supports, and other strategies for the pupil and the determination of supplementary aids and services, program modifications and supports for school personnel that will be provided for the pupil consistent with Section 1414(d)(1)(A)(i)(IV) of Title 20 of the United States Code.

- 3) Not less than one special education teacher of the pupil, or if appropriate, not less than one special education provider of the pupil.
- 4) A representative of the local education agency who meets all of the following:
 - a) Is qualified to provide or supervise the provision of specially designed instruction to meet the unique needs of individuals with exceptional needs
 - b) Is knowledgeable about the general education curriculum
 - c) Is knowledgeable about the availability of resources of the local education agency
- 5) An individual who can interpret the instructional implications of the assessment results.
- 6) At the discretion of the parent, guardian or the local educational agency other individuals who have knowledge or special expertise regarding the pupil including related services personnel as appropriate
- 7) Whenever possible, the individual with exceptional needs.

*California Code of Regulations***§3043 Extended School Year**

Extended school year services shall be provided for each individual with exceptional needs who has unique needs and requires special education and related services in excess of the regular academic year. Such individuals shall have handicaps which are likely to continue indefinitely or for a prolonged period, and interruption of the pupil's educational programming may cause regression, when coupled with limited recoupment capacity, rendering it impossible or unlikely that the pupil will attain the level of self-sufficiency and independence that would otherwise be expected in view of his or her handicapping condition. The lack of clear evidence of such factors may not be used to deny an individual an extended school year program if the individualized education program team determines the need for such a program and includes extended school year in the individualized education program pursuant to subsection (f).

- (a) Extended year special education and related services shall be provided by a school district, special education local plan area, or county office offering programs during the regular academic year.
- (b) Individuals with exceptional needs who may require an extended school year are those who:
 - (1) Are placed in special classes or centers; or
 - (2) Are individuals with exceptional needs whose individualized education programs specify an extended year program as determined by the Individualized Education Program Team?
- (c) The term "extended year" as used in this section means the period of time between the close of one academic year and the beginning of the succeeding academic year. The term "academic year" as used in this section means that portion of the school year during which the regular day school is maintained, which period must include less than the number of days required to entitle the district, special education services region, or county office to apportionments of state funds.
- (d) An extended year program shall be provided for a minimum of 20 instructional days, including holidays.

For reimbursement purposes:

- (1) A maximum of 55 instructional days excluding holidays shall be allowed for individuals in special classes or centers for the

- severely handicapped; and
- (2) A maximum of 30 instructional days excluding holidays shall be allowed for all other eligible pupils needing extended year.
- (e) A local governing board may increase the number of instructional days in the extended year period, but shall not claim revenue for average daily attendance generated beyond the maximum instructional days allowed in subsection (d) (1) and (2).
- (f) An extended year program when needed, as determined by the Individualized Education Program Team, shall be included in the pupil's individualized education program.
- (g) In order to qualify for average daily attendance revenue for extended year pupils, all of the following conditions must be met:
- (1) Extended year special education shall be the same length of time as the school day for pupils of the same age level attending summer school in the district in which the extended year program is provided, but not less than the minimum school day for that age unless otherwise specified in the individualized education program to meet a pupil's needs.
 - (2) The special education and related services offered during the extended year period are comparable in standards, scope and quality to the special education program offered during the regular academic year.
- (h) If during the regular academic year a pupil's Individualized Education Program specifies integration in the regular classroom, a public education agency is not required to meet that component of the individualized program if no regular summer school programs are being offered by that agency.
- (i) This section shall not apply to schools which are operating a continuous school program pursuant to Chapter 5 (commencing with Section 37600) of Part 22, Division 3, Title 2, of the Education Code.

[Authority cited: Section 56100(a) and (j), Education Code. Reference: Sections 37600, 41976.5 and 56345, Education Code; 34 C.F.R. 300.346]

Appendix B

Study Agreement

FCMAT

FISCAL CRISIS & MANAGEMENT
ASSISTANCE TEAM

CSIS California School Information Services

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM STUDY AGREEMENT September 12, 2008

The FISCAL CRISIS AND MANAGEMENT ASSISTANCE TEAM (FCMAT), hereinafter referred to as the Team, and the Anaheim City School District, hereinafter referred to as the District, mutually agree as follows:

1. BASIS OF AGREEMENT

The Team provides a variety of services to school districts and county offices of education upon request. The District has requested that the Team provide for the assignment of professionals to study specific aspects of the Anaheim City School District operations. These professionals may include staff of the Team, County Offices of Education, the California State Department of Education, school districts, or private contractors. All work shall be performed in accordance with the terms and conditions of this Agreement.

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

The scope and objectives of this study are to:

- 1) Review the efficiency and effectiveness of the district's Special Education fiscal and program delivery system, i.e. services provided.
- 2) Review the district process for determining the hiring of one-on-one paraprofessionals and make appropriate recommendations.
- 3) Review Special Education staffing ratios and the allocation of FTE teachers to student class size.
- 4) Review interdepartmental processes, including personnel requisitions and position control.
- 5) Review the organizational structure of the Special Education central office management and clerical support staff.

- 6) Review the effectiveness and efficiency of the Special Education budget development and monitoring process and the interface with the Business Services Department.
- 7) Identify the number of Special Education students being transported by reviewing Individualized Education Programs (IEPs). Confirm the current process of determining criteria for transportation services.
- 8) Review current transportation methods for special education students and determine if they are the most cost efficient methods. Make recommendations that would provide savings to the district, if the most efficient methods are not found to be in place, while maintaining legal compliance in meeting students needs.
- 9) Review the organizational structure and staffing efficiency of the Transportation Department.
- 10) Review methodology of determining home-to-school and door-to-door transportation.
- 11) Review the current bell schedules for home-to-school, door-to-door transportation and locations of facilities for special education classes.
- 12) Review legal expenses to determine if a cost savings is possible.

B. Services and Products to be Provided

- 1) Orientation Meeting - The Team will conduct an orientation session at the District to brief District management and staff on the procedures of the Team and on the purpose and schedule of the study.
- 2) On-site Review - The Team will conduct on-site meetings at the District office to gather documentation and conduct interviews. The Team will request assistance from the District in setting up interview schedules with staff.
- 3) Progress Reports - The Team will hold an exit meeting at the conclusion of the on-site reviews to inform the District representatives of significant findings and recommendations to that point.
- 4) Exit Letter - The Team will issue an exit letter approximately 10 days after the exit meeting detailing significant findings and recommendations to date and memorializing the topics discussed in the exit meeting.
- 5) Draft Reports - Sufficient copies of a preliminary draft report will be delivered to the District administration for review and comment.

- 6) Final Report - Sufficient copies of the final study report will be delivered to the District following completion of the review.
- 7) Follow-Up Support – Six months after the completion of the study, FCMAT will return to the District, if requested, to confirm the District's progress in implementing the recommendations included in the report, at no costs. Status of the recommendations will be documented to the District in a FCMAT Management Letter.

3. PROJECT PERSONNEL

The study team will be supervised by Anthony L. Bridges, Deputy Executive Officer, Fiscal Crisis and Management Assistance Team, Kern County Superintendent of Schools Office. The study team may also include:

- A. Dr. William Gillaspie, FCMAT Management Analyst
- B. JoAnn Murphy, FCMAT Special Education Consultant
- C. Ann Stone, FCMAT Special Education Consultant
- D. Trina Frazier, FCMAT Special Education Consultant
- E. Timothy Purvis, FCMAT Transportation Consultant
- F. Bud Bankston, FCMAT Transportation Consultant
- G. Terry Manges, FCMAT Human Resources Consultant

Other equally qualified consultants will be substituted in the event one of the above noted individuals is unable to participate in the study.

4. PROJECT COSTS

The cost for studies requested pursuant to E.C. 42127.8(d)(1) shall be:

- A. \$500.00 per day for each Team Member, while on site, conducting fieldwork at other locations, preparing and presenting reports, or participating in meetings.
- B. All out-of-pocket expenses, including travel, meals, lodging, etc. Based on the elements noted in section 2 A, the total cost of the study is estimated at \$29,000. The District will be invoiced at actual costs, with 50% of the estimated cost due following the completion of the on-site review and the remaining amount due upon acceptance of the final report by the District.
- C. Any change to the scope will affect the estimate of total cost.

Payments for FCMAT services are payable to Kern County Superintendent of Schools-Administrative Agent.

5. RESPONSIBILITIES OF THE DISTRICT

- A. The District will provide office and conference room space while on-site reviews are in progress.
- B. The District will provide the following (if requested):
 - 1) A map of the local area
 - 2) Existing policies, regulations and prior reports addressing the study request
 - 3) Current organizational charts
 - 4) Current and four (4) prior year's audit reports
 - 5) Any documents requested on a supplemental listing
- C. The District Administration will review a preliminary draft copy of the study. Any comments regarding the accuracy of the data presented in the report or the practicability of the recommendations will be reviewed with the Team prior to completion of the final report.

Pursuant to EC 45125.1(c), representatives of FCMAT will have limited contact with District pupils. The District shall take appropriate steps to comply with EC 45125.1(c).

6. PROJECT SCHEDULE

The following schedule outlines the planned completion dates for key study milestones:

| | |
|-------------------------------|---|
| Orientation: | October 27, 2008 |
| Staff Interviews: | (estimated) four days during the week of October 27, 2008 |
| Exit Interviews: | (estimated) October 30, 2008 |
| Preliminary Report Submitted: | December 12, 2008 |
| Final Report Submitted: | to be determined |
| Board Presentation: | to be determined |
| Follow-Up Support: | If requested |

7. CONTACT PERSON

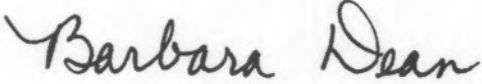
Please print name of contact person: José Banda, Superintendent,
Paul Burkart, Interim Assistant Superintendent,
Rob Coghlan, (incoming) Assistant Superintendent, Administrative Svcs.

Telephone 714 517-7537 FAX

Internet Address pburkart@acsd.k12.ca.us



José Banda, Superintendent 9/24/08
Anaheim City School District Date



Barbara Dean, Deputy Administrative Officer September 12, 2008
Fiscal Crisis and Management Assistance Team Date

In keeping with the provisions of AB1200, the County Superintendent will be notified of this agreement between the District and FCMAT and will receive a copy of the final report.