



Anaheim City School District

Special Education and Transportation Review

February 23, 2009

Joel D. Montero
Chief Executive Officer



CSIS California School Information Services

February 23, 2009

Mr. Jose Banda, Superintendent
Anaheim City School District
1001 S. East Street
Anaheim CA 92805

Dear Superintendent Banda:

In September 2008, the Anaheim City School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement to provide a review of the district's special education administration, programs and services, including transportation. Specifically, the agreement states that FCMAT will perform the following:

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 on one-on-one paraprofessionals and make appropriate recommendations.
3. Review special education staffing ratios and the allocation of the 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 a place, while maintaining legal compliance in meeting student needs.

FCMAT

Joel D. Montero, Chief Executive Officer


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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.

The attached final report contains the study team's findings and recommendations.

We appreciate the opportunity to serve you and we extend our thanks to all the staff of the Anaheim City School District.

Sincerely,



Handwritten signature of Joel D. Montero in black ink, featuring a stylized 'J' and 'M'.

Joel D. Montero
Chief Executive Officer

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Foreword

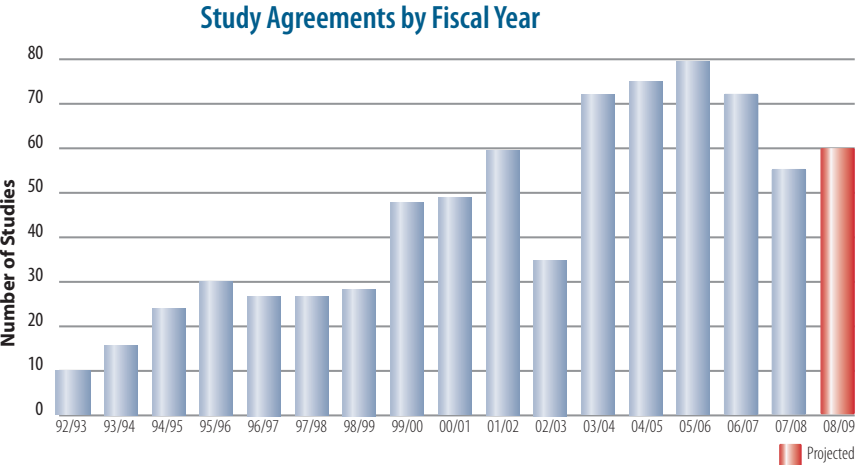
FCMAT Background

The Fiscal Crisis and Management Assistance Team (FCMAT) was created by legislation in accordance with Assembly Bill 1200 in 1992 as a service to assist local educational agencies in complying with fiscal accountability standards.

AB 1200 was established from a need to ensure that local educational agencies throughout California were adequately prepared to meet and sustain their financial obligations. AB 1200 is also a statewide plan for county offices of education and school districts to work together on a local level to improve fiscal procedures and accountability standards. The legislation expanded the role of the county office in monitoring school districts under certain fiscal constraints to ensure these districts could meet their financial commitments on a multiyear basis. AB 2756 provides specific responsibilities to FCMAT with regard to districts that have received emergency state loans. These include comprehensive assessments in five major operational areas and periodic reports that identify the district’s progress on the improvement plans.

Since 1992, FCMAT has been engaged to perform nearly 700 reviews for local educational agencies, including school districts, county offices of education, charter schools and community colleges. Services range from fiscal crisis intervention to management review and assistance. FCMAT also provides professional development training. The Kern County Superintendent of Schools is the administrative agent for FCMAT. The agency is guided under the leadership of Joel D. Montero, Chief Executive Officer, with funding derived through appropriations in the state budget and a modest fee schedule for charges to requesting agencies.

Total Number of Studies.....	711
Total Number of Districts in CA.....	982
● Management Assistance.....	675 (94.9%)
● Fiscal Crisis/Emergency	36 (5.1%)
Note: Some districts had multiple studies.	
● Districts (7) that have received emergency loans from the state.	
(Rev. 7/30/08)	



Introduction

Background

The Anaheim City School District is the largest elementary school district in the city of Anaheim, serving approximately 19,200 students in grades K-6. The district's 24 schools include five schools on a four-track, year-round schedule and 19 schools on a single-track modified year schedule. Approximately 2,212 of the district's students are identified as pupils with disabilities.

The district's enrollment has declined for the past four years, from 20,690 students in 2005-06 to 19,958 in 2006-07 and 19,232 in 2007-08. Revenues have decreased proportionately with the decline in student enrollment and continue to pose significant financial challenges for the district.

In August of 2008 the Anaheim City School District requested that FCMAT assist the district by reviewing the district's special education administration, programs and services, including transportation. The study agreement specifies that FCMAT will perform the following.

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 on one-on-one paraprofessionals and make appropriate recommendations.
3. Review special education staffing ratios and the allocation of the 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 a place, while maintaining legal compliance in meeting student 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.

Study Guidelines

FCMAT visited the district on October 27, 2008 to conduct interviews, collect data and review documents. This report is the result of those activities and is divided into the following sections:

- I. Executive Summary
- II. Special Education
 - a. Organizational Structure and Staffing
 - b. Program Delivery
 - c. Instructional Assistants
 - d. Staff Development
 - e. Position Control
 - f. Fiscal Overview
- III. Transportation
 - a. Ridership
 - b. Department Structure, Staffing and Service
 - c. Bell Schedules
 - d. Routing
- IV. Appendices

Study Team

The study team was composed of the following members:

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*As members of this study team, these consultants were not representing their respective employers but were working solely as independent contractors for FCMAT.



Executive Summary

Special Education

The district recently hired a new superintendent and several other new cabinet members, who have demonstrated a clear commitment to excellence in education with regard to the district's decision making processes. When reviewing the educational delivery system, the district's administration recognized that several departments' operations require a significant amount of funding from the general fund. In particular, the special education and transportation programs need continued increases in support from the general fund to maintain services. The district recognized the importance of these critical educational services and was not critical of any one department, but requested that FCMAT determine whether any cost effective measures could be implemented while continuing to meet students' academic needs.

Efficient and effective special education program delivery systems in large districts rely on the collaboration of multiple departments, including special education, human resources, business, and curriculum. Leadership and staff in each of these departments must have a technical understanding of the various special education programs to ensure appropriate budgeting, staffing, data collection and reporting. Communication and collaboration are essential, as is the careful monitoring of program costs and staffing; the district should seek to strengthen these critical components.

The study team reviewed the key role that school site administrators play and the responsibilities they must carry out to maintain special education program compliance and fiscal solvency. School site administrators are not trained to be aware of financial obligations related to requests for additional special education services, nor are they trained to determine if the requests are warranted. The special education/SELPA director should always be included in the decision making process when decisions have fiscal implications. With proper planning and training, many of these decisions can be part of the original individualized educational program (IEP) meeting. It is best to have an administrator present who is knowledgeable about special education programs and has the authority to commit additional district resources.

The special services department does not use extended school year (ESY) guidelines to determine if a student qualifies for these services as part of a free and appropriate public education (FAPE) in the least restrictive environment (LRE). As a result, many of the district's special day class students receive extended school year services automatically rather than regression and recoupment being the driving force behind the decision to provide these services. This can be very costly; establishing and implementing guidelines for these types of services could reduce costs.

The district's preschool special education teachers currently teach either the morning or the afternoon session five days per week; the remainder of their day includes assessments and IEPs. In many California school districts, the preschool special education certificated

staff teach both the morning and afternoon sessions four days per week and use the fifth day to complete assessments and IEPs. This alternative model may result in greater cost efficiency and equity among teachers.

The district lacks guidelines to assist in determining the need for and use of one-to-one instructional assistants. Guidelines can assist the district should it face challenges from parents and advocates for such services. Once guidelines are adopted, administrators and special education staff must be trained in their application.

The district also has no process to determine the continued need for one-to-one instructional assistant services or for reducing or phasing out services when a student with instructional assistant services moves, is absent for long periods of time, or exits the special education program due to their age. School site administrators reportedly fail to notify the special services department when these situations occur and simply move the instructional assistant somewhere else on the campus. Because this practice can be costly, the district should implement a process for determining the need to continue these services.

The FCMAT Team observed a lack of communication between the special education and transportation departments, and the district lacks documented 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 district's procedural manual. The district should improve communication between these departments and implement procedures for determining the need for transportation.

Staffing and Position Control

The district's financial system has a position control module for tracking all certificated, classified and management employees. The module does not notify users when the maximum number of authorized positions is exceeded, though it can be enhanced to restrict positions in excess of the authorized number. The district should implement this software feature to properly track the number of authorized positions.

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. The FCMAT team strongly recommends that the district implement collaboration and communication strategies to achieve more timely approval of requests for new positions and to ensure that fiscal services staff have adequate knowledge of special education staffing needs.

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 2007-08. However, program costs increased by approximately \$1 million over a four year period. Many of these costs increased due to the maintenance of effort required to implement step and column changes and health and welfare annual cost increases associated with the district's respective collective bargaining agreements.

Transportation

The district's bus drivers are dedicated employees and a review of documents indicates an excellent safety record. In the 2007-08 fiscal year, 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 due to overcrowding.

The department's single transportation services coordinator's duties have become more difficult to accomplish because of the size of the department and vacant positions. The district should immediately fill the two vacant transportation services coordinator positions. Interviews indicated that school site personnel generally perceive transportation services as less than satisfactory; late buses and incorrect routing were two of the areas of concern referenced. The district's staggered morning and afternoon starting times and dismissal bells are timed too closely together to allow for timely pick-up and drop-off of students, or to accommodate traffic and other irregularities. In addition, dismissal bell times vary from site to site. As a result, sometimes additional buses are needed or students are delayed.

Although the district recently purchased an industry-standard transportation software system called Trans Track that has modules for bus routing, vehicle maintenance, field trip scheduling and driver training records, only the vehicle maintenance module has been implemented. Most school districts with transportation programs of comparable size to Anaheim City use some type of electronic routing software. This type of software also enables transportation personnel to rapidly provide cost scenarios in case of boundary changes, new school openings or increases in nontransportation zones. The district should fully implement additional transportation software modules so that routing, cost estimates and other functions can be performed electronically.

Findings and Recommendations

Special Education

Organizational Structure and Staffing

Throughout California, county and district superintendents, school principals and other educators are playing a larger role in special education. Two of the most significant reasons for the increased interest in special education are to ensure that all students receive an effective education and to monitor the contributions from the district's unrestricted general fund.

Efficient and effective special education program delivery systems in large districts rely on the collaboration of the special education, human resources, business, and curriculum departments. Leadership and staff in each of these departments must have an understanding of special education to ensure appropriate budgeting, staffing, data collection and reporting. Communication and collaboration are essential, as is the careful monitoring of program costs and staffing.

The district needs to increase training for staff in the special services, human resources and business departments regarding special education. This type of professional development can often be achieved by arranging opportunities for staff development during routine meetings. Topics could include updates regarding legislative, funding and compliance issues that have fiscal and operational implications for special education.

The district's special services department has remained more centralized than other departments because of the nature of its services and general education personnel's lack of understanding of special education. Centralization has also been a part of the attempt to curb the cost of litigation, which has been held to a minimum during the last few years.

The district is in a unique transitional period, with a new superintendent and a new leadership team at the cabinet and district level. It is evident that there is strong commitment to collaboration and communication regarding all aspects of special education programming and finance.

Comparative statistics using statewide benchmarks gathered by School Services of California provide a standard measure of class and caseload size compared to other districts in the state. School Services of California is a private consulting firm that specializes in consulting services, data collection and collective bargaining expertise to school districts, county offices of education and community colleges.

Psychologists, Nurses and Program Specialists

Table 1 shows the statewide average staff-to-student ratios for psychologists and nurses statewide compared with those in Anaheim City School District.

Table 1: Staff-to-student ratios for psychologists, nurses and program specialists

Special Education Staffing	Elementary School Districts Statewide	Anaheim City School District
Psychologists	1:1,596	1:1,600
Nurses	1:3,421	1:2,431
Program Specialists	1:1,021	1:2,212

Source: CBEDS general education data for 2006-07 fiscal year.

Based upon comparable California Department of Education CBEDS data, the district maintains adequate staff-to-student ratios for school psychologists. The ratio of nurses to students is slightly higher than the statewide average; however, the nurses are not funded out of special education.

The district maintains a very low ratio of program specialists to students and is thus understaffed in this position. Staff indicated that the special education department had two program specialists in previous years; however, the previous administration did not approve filling one of the positions when it became vacant.

Program specialists play an important role in special education departments, particularly in regard to cost effectiveness. These positions support the classroom through consultation, observation, prevention, intervention and curriculum support. Their knowledge of the students and the district's resources can help individualized education program (IEP) teams modify programs to accommodate students' needs. They can also provide staff development and training options. As a single-district special education local plan area (SELPA), the district receives \$252,000 per year in AB 602 funding to provide program specialist regionalized services. It is not clear how this funding is allocated in the district's budget model; however, the district needs to consider reinstating the second program specialist position.

Special Day Classes

Special day class (SDC) enrollment is 12-15 students per class, which is consistent with the statewide average. Resource specialist (RSP) caseloads average 26 and have a maximum that is consistent with education code requirements. Speech caseloads are blended to combine services to preschool and K-6 students. The district maintains an appropriate district-wide average caseload of 48.6 students for speech, using a formula to accommodate the caseload cap of 40 preschool students at the preschool level and an average of 55 students for grades K-6.

Assistive Technology

Responsibilities for assistive technology (AT) are included in a position that has numerous other responsibilities. A district the size of Anaheim City needs to allocate at a mini-

mum an additional 0.5 full time equivalent (FTE) position to the provision of assistive technology using a certified AT instructor. The need for travel and the itinerant nature of this position in a school district with 24 schools also needs to be taken into account. Individualized education program (IEP) teams are required to consider the need for assistive technology devices and services as defined in Section 1401(1) and (2), Title 20, of the United States Code. Services may include an individualized assessment, classroom observation, securing appropriate equipment, and training for students, parents and staff.

Occupational Therapists

The district's occupational therapy (OT) caseloads average 20 students per FTE; however, the typical OT caseload in other districts is 30-45 students. There is no doubt that the district is providing excellent services in this area; however, current staffing exceeds the average of other districts statewide, and the district could reduce costs by eliminating two OT positions.

Recommendations

The district should:

1. Establish clear communication and create collaborative relationships among the special services, human resources, and business departments to maintain fiscal efficiency and effectiveness.
2. Increase training for staff within the special services, human resources, and business departments to increase knowledge regarding special education.
3. Train district-level administrators, especially new cabinet members, in all areas of special education.
4. Consider restoring the unfilled second program specialist position to maintain a staffing ratio that is consistent with the statewide average.
5. Consider eliminating two occupational therapist positions to achieve a staffing ratio that is consistent with statewide practice.
6. Consider establishing a 0.5 FTE assistive technology position, taking into consideration the need for travel and the itinerant nature of this position.



Program Delivery

School Site Administrative Support

Based on interviews, some school site administrators lack a full understanding of special education processes and procedures. In addition, there are numerous compliance issues with the IEP process that the district will need to address.

Interviews with school site administrators indicated that many are confused about their role and responsibilities with regard to special education. Some principals are involved and take pride in the special education services provided at their school site, while others view special education as the responsibility of the district office. The majority of principals do not always attend IEP meetings, and principals sometimes sign IEPs without having attended the meetings. In interviews, staff also indicated that a general education teacher is not always present when special day class (SDC) teachers hold their IEP meetings.

The principals at a few sites embrace special education and conduct staffing meetings prior to IEP meetings to prepare to meet the needs of students and the anticipated requests from parents. At the majority of sites, where the principals are not adequately trained or do not embrace special education, the school psychologist attends the IEP meeting as the administrative designee and case manager. This is problematic because the psychologists are not trained in the fiscal implications of their decisions, do not meet the education code requirements as a representative of the local educational agency, and lack the background in curriculum necessary for this role. Thus when requests are made which have a fiscal impact on the district, the meetings are suspended and then reconvened at a future date and time, after the school psychologist has discussed the fiscal request with the special education department for approval. This inefficient process delays services to students, increases staff time spent and the attendant costs, and may increase the possibility of litigation. The process at sites where the principals are conducting staff meetings prior to IEP meetings could serve as an excellent model for use district-wide.

School site administrators are not trained to be aware of financial obligations related to requests for additional services, nor are they trained to determine if a request is warranted. The special education/SELPA director should always be included in the decision making process when decisions have fiscal implications. With proper planning and training, many of these decisions can be part of the original IEP meeting. It is best to have an administrator present who is knowledgeable about special education and who has the authority to commit the required district resources. California Education Code Section 56341 (a) (b) (1-7), included in Appendix A of this report, outlines IEP team membership and can provide the district with specific guidance in this area.

The core curriculum is not always consistent with regard to students with special needs, though this varies from site to site. The special services director has not been included on the committee that is responsible for adopting the core curriculum. Interviews indicated that a consistent curriculum is not being used in the programs for severely disabled students; however, the department has recently purchased the Special Education

Administrators of County Offices' (SEACO) Curriculum Guide, and training is under way for teachers.

The special education staff at some school sites work in isolation and have the perception that they are fending for themselves rather than working as part of a collaborative system. Interviews indicated that teachers do not have the time they need to network and collaborate with their peers. It is especially important to have the time to analyze student data as a group.

There is notably inadequate support from some school site administrators for special education technology and instructional supplies. Special education teachers do not always have the same access to instructional supplies or computers as general education teachers, and the allocation of instructional supplies is inconsistent across the district. Some principals provide all the supports and instructional supplies needed, but others do not. Teachers reported that they pay for instructional supplies with their personal money. All classrooms need to receive equal support.

The district lacks a system of accountability for school site administrators with regard to both the academic progress of all students and special education compliance and implementation. As a result, most site administrators are not held accountable for IEP compliance, including overdue annual and triennial reviews. School site administrators and general educators are vital to the IEP process, especially in the areas of IEP development and implementation. They must ensure that all special education students receive a free and appropriate public education (FAPE), a basic level of opportunity, and participation in the general education curriculum in the least restrictive environment (LRE).

School site administrators are not provided with adequate training regarding their role and responsibilities in relation to special education, or regarding specific special education issues and topics. Special services department personnel could provide this training

School site administrators need to continue and increase their involvement in the evaluation of special education teachers and instructional assistants. This will help the special services department and increase principals' responsibility for special education.

Interviews indicated that some school sites are not always providing adequate interventions before a special education assessment is conducted. Special education assessments are costly and interventions need to be exhausted before a student is assessed. Appropriate interventions also help ensure that students are served in the least restrictive environment (LRE). Inadequate interventions in general education can lead to the over-identification of students as requiring special education programs and services.

Recommendations

The district should:

1. Ensure that school psychologists understand the fiscal impact of their decisions at IEP meetings, and train school site administrators and the special services department to make financial commitments for the district.

2. Train the staff to hold staffing meetings prior to IEP meetings to discuss students' needs and parent requests for additional services.
3. Make efforts to ensure that an administrator who can commit district resources is trained appropriately and attends IEP meetings.
4. Ensure that all school site administrators attend IEP meetings and understand their role at these meetings.
5. Develop a needs assessment to determine the areas in which school site administrators feel they need further training related to special education.
6. Require school site administrators to attend training regarding crucial special education issues and topics. Consider having special services department personnel provide this training, and ensure that it includes the following topics:
 - a. Overview of special education.
 - b. Interventions prior to special education.
 - c. The IEP team process.
 - d. Implementing and evaluating effective programs.
 - e. Special education funding.
 - f. The meaning of contributions from the general fund and misperceptions surrounding this topic.
 - g. Current special education litigation and legal requirements.
 - h. Special education resources.
 - i. Facilitated IEP and alternative dispute resolution (ADR) training.
 - j. Maximizing instructional assistant support and other resources.
 - k. Integration and inclusion.
7. Ensure that appropriate interventions are implemented before a student is assessed for special education services.
8. Require every school site administrator to provide special education teachers with adequate equipment and instructional materials, including core curriculum, to ensure equity with general education teachers in this area.
9. Ensure that a general education teacher is present when special day class teachers hold their IEP meetings.
10. Develop a district-wide plan for school site administrators to take responsibility for all students at their sites, including special education students.

Extended School Year Services (ESY)

The special services department does not use extended school year (ESY) guidelines to determine if a student qualifies for these services as part of a free and appropriate public education (FAPE) in the least restrictive environment (LRE). As a result, many of the district's special day class students receive extended school year services automatically rather than regression and recoupment being the driving force behind the decision to provide these services. This can be very costly and can increase the contributions from the unrestricted general Fund. ESY services should not be provided to students who do not meet the criteria for these services. The special services department has also not participated in district meetings and conversations regarding summer services.

The cost of the district's ESY program, including operational costs and certificated and classified staff costs, is \$907,385 per year. Extended school year services are determined by following the criteria provided in Section 3043 of the California Code of Regulations (CCR), which is included in Appendix A. In addition, many special education local plan areas (SELPAs) and districts in California have developed and implemented effective ESY Guidelines. The district should develop similar guidelines.

Recommendations

The district should:

1. Develop ESY criteria and guidelines for staff to use when determining if a student requires these services. The district should consider adopting guidelines that have already been developed by other districts and SELPAs in California.
2. Ensure that staff receive training regarding the ESY guidelines.
3. Ensure that decisions about the need for ESY services are based on regression and recoupment.

Autism Programs

Nationwide, increasing numbers of students are being identified with autism spectrum disorders. The district's special education enrollment is comparable to that of districts across Orange County and California, and, as the data in Table 2 demonstrates, there is no indication that the district is over-identifying students as needing special education programs and services. However, closer examination of the rapid increase in the preschool special education population and the high incidence of autism (Tables 3 and 4) reveals a much different scenario and additional causes for concern. The state has not addressed the increased costs of programs and services for autistic students.

Table 2: Percentage of pupils enrolled in special education

School Year	Anaheim City	Orange County	California
2005-06	9.4%	10.2%	10%
2006-07	10.0%	10.1%	10%
2007-08	10.1%	10.1%	10%

Table 3: Percentage of preschool pupils (ages 3-4) in special education

School Year	Anaheim City	Orange County
2005-06	11%	7.3%
2006-07	11.3%	8%
2007-08	11.3%	8%

Table 4: Percentage of pupils ages 0-22 identified with autism

School Year	Anaheim City	Orange County	California
2005-06	7.4%	7.4%	5%
2006-07	9.0%	9.0%	6%
2007-08	10.3%	11%	7%

Autism programs in schools need to be research-based, and the staff working in these programs must receive training in all areas relevant to the programs in which they provide instruction. Training needs to include general and special education teachers, administrators, designated instructional services (DIS) support staff, and instructional assistants. Parents also need some additional training pertinent to the education of their children, especially when there is a crossover into the home environment. It is important to develop and foster positive relationships with parents throughout this collaborative process.

A multi-tiered model of supervision was proposed and developed by the district's special services department, but is not being fully implemented. The district needs to implement such a model and ensure that it is legally defensible. Special services staff development in the areas of Discrete Trial Training (DTT) and Applied Behavior Analysis (ABA) is not sufficient. A small initial investment of funds and resources in staff development and training is typically needed to achieve a reduction in costs over time. To provide additional staff development and training, the district would need to fill its open program specialist position. Although this represents an expense, the tiered model of supervision cannot be implemented without filling this position, and a savings will likely be realized over the long term due to increased efficiency and effectiveness. Ideally, a Discrete Trial Training program would include the autism program specialist, the district DTT supervisor, teacher supervisor, DTT assistant supervisor (lead aide III), and a DTT instructional assistant III. Using existing staff to fill these positions would be beneficial.

A tiered model of supervision would need to include the following staff positions and responsibilities:

A. Autism Program Specialist

Responsibilities:

- Directly responsible for Discrete Trail Training (DTT) program development, implementation, and program efficacy.
- Oversee district DTT programs providing services to students on the autism spectrum.
- Recruitment, hiring, and placement of instructional assistant IIIs (IA III).
- Collaborate with the district DTT supervisor in training and supervision of IA IIIs for school programs.
- Consult with school staff regarding the inclusion of preschool and school aged students on the autism spectrum.
- Attend IEP meetings for students participating in DTT and other programs.
- Coordinate staff trainings provided by nonpublic agencies (NPAs).
- Serve as the contact with the Association of California School Administrators (ACSA) for the county office of education's Systematic Utilization of Comprehensive Strategies for Ensuring Student Success (SUCSESS) project, and coordinate attendance of staff at SUCSESS trainings.
- Additional duties as determined by the special services department director.

This position should be supervised by the special services department director. No decisions should be made without the director's approval. The director should also be the main decision maker regarding which type of employee would be best suited for this program specialist position.

B. District DTT Supervisor

Responsibilities:

- Provide DTT supervision/consult to school programs and for individual DTT cases.
- Collaborate with the autism program specialist in the hiring, training, and supervision of IA IIIs.
- Participate in training of IA IIIs provided by outside NPAs or consultants.
- Schedule and facilitate weekly and monthly clinics.
- Participate in training provided by county office's SUCSESS project.
- Training of shadow/inclusion IAs.

C. Teacher Supervisor

Responsibilities:

- Provide direct on-site school supervision of IA IIIs.
- Plan and coordinate school DTT program.
- Consult with district DTT Coordinator.
- Attend weekly and monthly clinics.
- Attend OCDE SUCSESS project trainings and appropriate advanced trainings.

D. DTT Assistant Supervisor/Lead Aide III

Responsibilities:

- Under supervision, administer one-to-one DTT therapy to students in a school or home setting.
- Provide demonstration and instruction to less experienced aides through modeling and/or shadowing techniques.
- Provide information to supervisor concerning student progress.
- Conduct probes and report outcomes to supervisor.
- Collect data and record anecdotal therapy notes.
- Build program notebooks on supervisor's directions.
- Implement program modifications.
- Attend clinics; prepare therapy summary.
- Attend monthly meeting with autism program specialist and DTT coordinator.
- Participate in advanced training sessions.

E. DTT Instructional Assistant III

Responsibilities:

- Under supervision, administer one-to-one DTT therapy to students in a school or home setting.
- Provide information to supervisor concerning student progress.
- Conduct probes and report outcomes to supervisor.
- Collect data and record anecdotal therapy notes.
- Maintain and organize program notebooks.
- Attend clinics
- Implement program modifications, administer drills, conduct probes, review data with supervisor, and report concerns.
- Participate in training sessions.

One of the district's school psychologists is scheduled to take the exam to receive certification as a Board Certified Behavior Analyst, and the second school psychologist has the training for this certification but needs to take the exam. Districts that operate autism programs benefit from having a Board Certified Behavior Analyst, especially when the district's programs are questioned in due process hearings. A number of autistic students have intensive behavioral issues that require staff to have specialized training to assist with aggressive and disruptive behavior, and Board Certified Behavior Analysts are also beneficial in these situations.

A Facilitated Individualized Education Program (FIEP) meeting is an IEP meeting conducted by a trained facilitator not directly involved in the education of the student. The facilitator leads the IEP team in a systematic process that helps parents and the district reach agreement while developing various components of the IEP. The facilitator's responsibilities include setting the agenda, ensuring that the meeting remains focused on the student's needs, and encouraging effective communication among all team members. The outcome of the FIEP meeting is a signed IEP that has been developed collaboratively by the district and parents. A few of the district's special services department staff members have received training in the FEIP process. It would benefit the department to train more staff members in this process so that they can assist in higher profile IEPs.

Recommendations

The district should:

1. Ensure that its autism programs are research-based.
2. Ensure that staff members assigned to the autism programs receive training in all areas pertinent to the programs to which they are assigned and that parents are included in the trainings when appropriate.
3. Ensure that positive relationships with parents are developed and fostered.
4. Encourage the school psychologists who are working to acquire certification as Board Certified Behavior Analysts to take and pass the exam.
5. Train more special services department staff members in the FIEP process.
6. Consider implementing the tiered model for supervision that was proposed and developed by the district's special services department, with an understanding that the model cannot be implemented without filling the autism program specialist position. The model should be legally defensible and should include the positions and responsibilities outlined above.

Preschool Programs

Preschool programs in California do not have a base funding source such as revenue limit apportionment. Districts and SELPAs rely strictly on federal funding through a preschool local entitlement and the preschool federal grant. As a result, preschool programs in California are typically under-funded. Attempts to increase this funding have not yet been successful.

The district's preschool special education teachers currently teach either the morning or the afternoon session five days per week; the remainder of their day includes assessments and IEPs. In many California school districts, the preschool special education teachers teach both the morning and afternoon sessions four days per week and use the fifth day to complete assessments and IEPs. This model would result in greater cost efficiency and equity among certificated staff.

The district's assessment center team assessed 325 preschool students during the 2007-08 school year. The number of preschool assessments continues to increase, partly due to the increase in autism assessments. This increase has had a significant impact on preschool programs and the preschool assessment team. Currently, almost all students reportedly receive a full comprehensive assessment to rule out all disabilities. California Education Code section 56320 states that students must be assessed in all areas related to suspected disabilities. Assessing only the areas of suspected disabilities would reduce the preschool assessment team's workload and the workload of preschool teachers who travel to the preschool assessment center to conduct assessments. This change might also reduce costs.

An estimated 25% of the district's assessed preschoolers are recommended for a five-day preschool program, and without exception transportation services are automatically offered at the IEP meetings for these students. Transportation should be offered only if it is warranted, documented and justified based on the student's IEP. The district does not appear to have or use a policy and procedures manual to determine when transportation is warranted for a special education student, nor are staff members trained in such policies and procedures. Implementing policies and procedures could reduce costs.

Recommendations

The district should:

1. Consider having preschool teachers provide instruction in the morning and afternoon four days per week and use the fifth day to conduct assessments and IEPs.
2. Assess students only in the areas of suspected disabilities.
3. Offer transportation services to a student only when such services are warranted.
4. Create a policy and procedures manual to help staff determine if transportation services are needed.
5. Provide staff with training once the manual is developed to assist in making determinations regarding transportation.

Exit Criteria

The district's special education pupil count has remained fairly consistent for the past six years; the June 2008 special education pupil count total was 3,038 students. Establishing appropriate exit criteria could reduce this number and thus reduce the district's costs.

The special education department does not use exit or dismissal criteria and guidelines to determine a student's continued eligibility for special education services. Exit criteria are used to phase out or end special education services when the disability no longer exists or no longer adversely affects a student's educational performance. Many districts and SELPAs in California use a dismissal criteria checklist to assist with this process.

The IEP team may determine that a student no longer qualifies for services. A student may also be identified as having a disability but may not receive special education services because the disability has no adverse effect on the student's progress in the core curriculum. The IEP team may also determine that a student's needs can be met in another placement. In this type of situation, services may not be warranted. It is important to train staff and parents to recognize that when the team finds that special education services are necessary, those services may not be provided indefinitely and that exit criteria and guidelines are usually accompanied by a monitoring system.

Speech and language services will be addressed elsewhere in this report; however, it should be noted that the district's pupil count for these services is very high and that exit criteria can also be used for these types of services.

Recommendations

The district should:

1. Immediately develop exit criteria and guidelines to be used during evaluations to determine if students continue to qualify for special education.
2. Provide training for staff in the appropriate use of the exit criteria and guidelines.

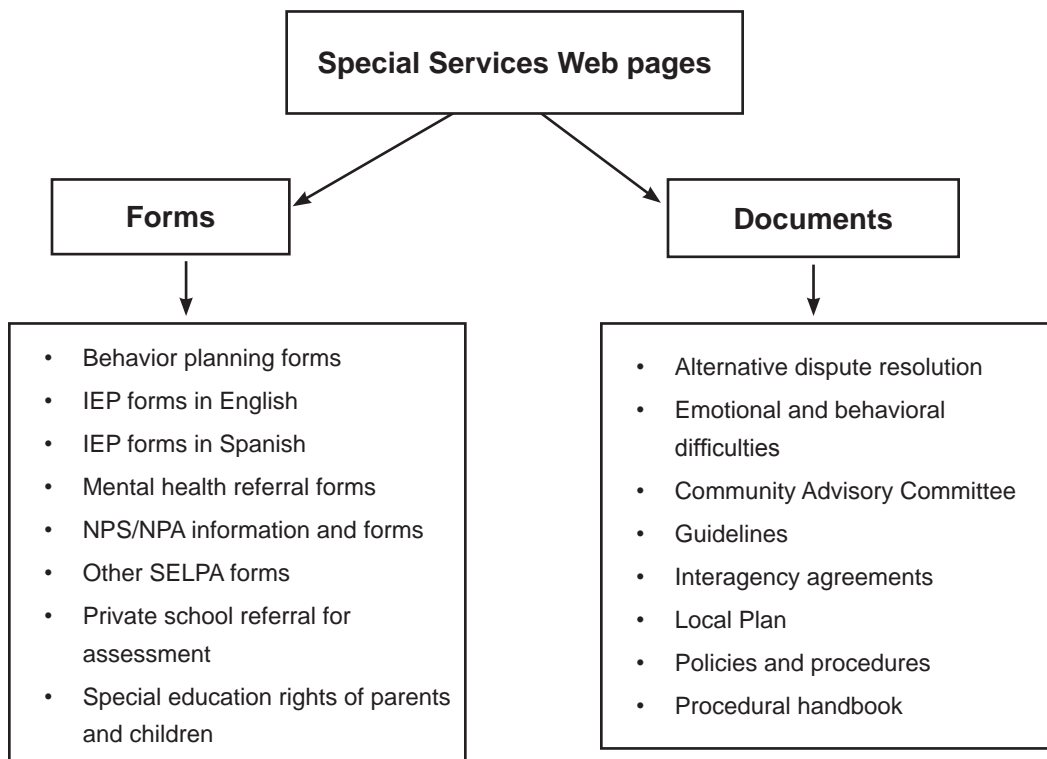
Web Site

The special services department section of the district's Web site could benefit from an update that includes enhanced content and any changes to the district's policies and procedures. The district currently posts some documents on its Web site, but special education staff and parents do not have immediate access to all necessary resources, schedules, policies, procedures, guidelines, and forms which could all be provided through an interactive Web site. Although it involves some work in the short term, and although the program specialist position would need to be filled to accomplish this, improving the special services department Web site by providing access to more documents could benefit the department in the long term by improving communication, efficiency and effectiveness.

Recommendations

The district should:

1. Update the special services section of the district Web site to include all appropriate resources, schedules, policies, procedures, guidelines and forms for staff and parents.
2. Consider following the organization suggested by the following chart and providing the documents and forms listed therein when updating the Web site:

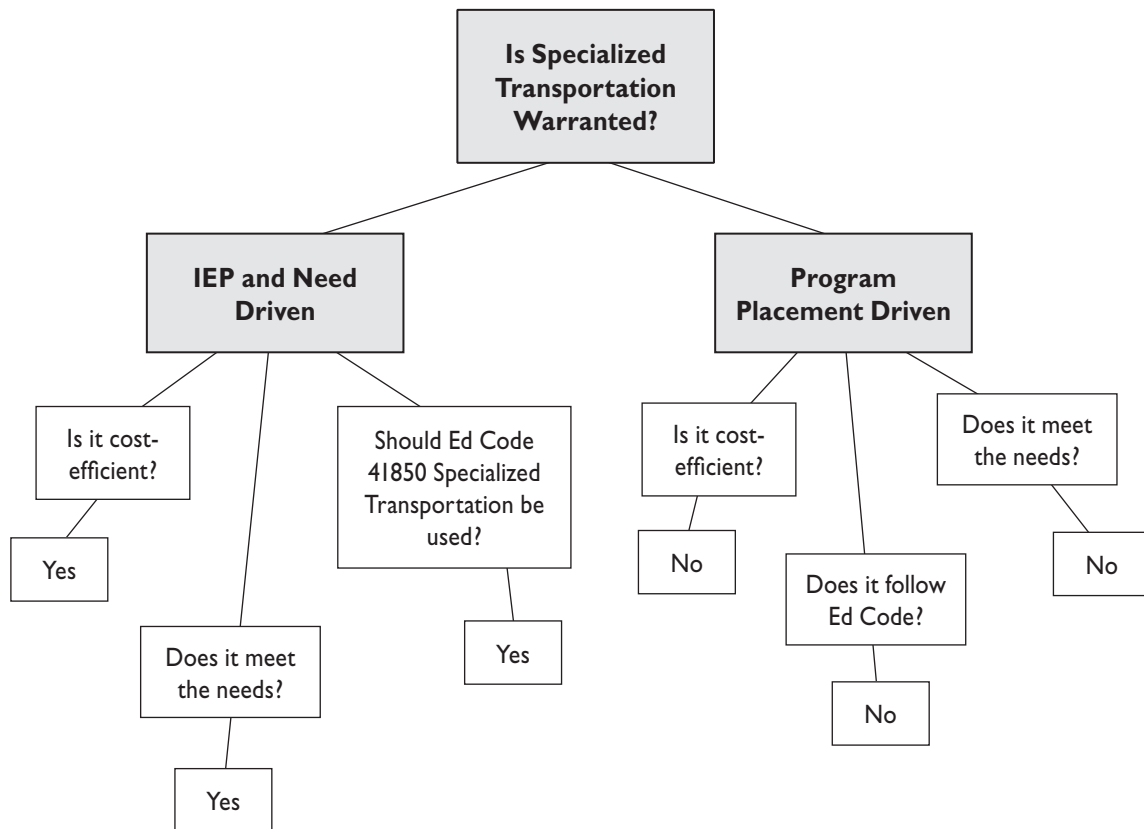


Special Education Transportation

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

would benefit the district to review in detail all of the transportation services the county office contract provider supplies to its NPS students to determine if the district may be able to transport some of these students at a lower cost.

Recommendations

The district should:

1. Develop procedural guidelines for transportation as a related service, and ensure that transportation as a related service is included in the procedural handbook for special education.
2. Use powerful and effective tools such as a decision tree to assist IEP teams in determining the need for transportation.
3. Provide staff development to raise awareness of the need for transportation to be included as a related service, and train staff in strategies for accessing appropriate services for students.
4. Review the use of county office contract transportation provider for its 43 special education students attending nonpublic schools.



Instructional Assistants

The number of California school districts using one-to-one and special circumstance instructional assistants has increased dramatically over the past several years, placing a strain on education budgets and increasing unrestricted general fund contributions. The only way for a district to gain control of this situation is to develop and implement guidelines, policies and procedures for the assignment of instructional assistants and enforce strict monitoring of these services.

The district has approximately 19 behavior interventionists working six or more hours per day, as well as 46 full-time (six hour per day) instructional assistants and 138 part time (three to 3.75 hours per day) instructional assistants. There is high turnover among the part time instructional assistants, resulting in 16 vacant positions at the time of FCMAT's review. Much less turnover is experienced in the full time positions. The district attempts to combine part time positions to create full time positions when possible; however, this is not always an option. One full time position costs as much as three part time positions because of the increased cost of health and welfare and other statutory benefits.

The district lacks guidelines to assist in determining the need for and use of one-to-one instructional assistants. Guidelines can assist a district when it is challenged by parents and advocates for such services. Once guidelines are adopted, administrators and special education staff must be trained in their use. Guidelines can assist staff with the following:

- Determining the need for one-to-one instructional assistants
- Dependence factors
- Measurable outcomes
- Descriptors of success
- Alternatives to one-to-one assistants
- Determining if existing resources are being maximized
- Evaluating the continuing need for one-to-one instructional assistant services.
- Determining when it is appropriate to add hours to an existing assistant's contract.

The district also has no process to determine the continued need for services or for reducing or phasing out services when a student with instructional assistant services moves, is absent for long periods of time, or exits special education due to their age. School site administrators reportedly fail to notify the special services department when these situations occur, and simply move the instructional assistant somewhere else on campus. This type of practice can be very costly and inefficient. The district lacks a monitoring system for these services. Even with such a system, it would be difficult to monitor these services closely at the present time because of the lack of adequate special services management staff. In particular, the two open program specialist positions hamper the department's efficiency and effectiveness, which increases costs over the long term. Adequate management staffing is needed to fulfill the department's requirements.

The district also appears to lack a monitoring system that would alert staff when instructional assistants work additional hours or exceed 19 hours of work per week and thus activate full time status. There is also no backup procedure in case a staff member is absent. Comparable districts that operate successful programs include monitoring systems for position control purposes.

The district uses a personnel action form (PAN) when additional instructional assistant services are requested. It is evident that some principals, vice principals, teachers and school psychologists do not receive adequate training to help them determine whether this form needs to be completed. Formal guidelines could help staff make this type of determination and increase cost efficiency. The personnel action form is reportedly sometimes lost in the routing between the special services and human resources departments. In addition, the time between the posting of an open instructional assistant position and the hiring of an individual for that position is lengthy and includes a protracted process.

School psychologists usually complete the district's Request for Special Circumstance Instructional Assistant form. Principals and teachers can also complete this form, which is sent to the special services director for approval. The fact that the psychologists are not trained in the fiscal implications of their decisions is a concern. Guidelines and training would help address this concern and increase efficiency.

Page 30, Article VIII, Class Size, 8.2.5, of the current CTA/NEA collective bargaining contract, states, "Should the class size reach fourteen (14), the affected member may request additional resources from the Director of Special Education." Teachers usually request additional instructional support when class size exceeds 14. The district needs to continue monitoring closely any requests for additional instructional assistant support from the special services director. The district's common current practice of adding 30 minutes to an instructional assistant's contract appears to be cost effective.

Training for instructional assistants is not adequate, particularly training for one-to-one and special circumstances assistants. When the open program specialist position is filled, this position can assist the special services director with planning and implementing additional staff and professional development training.

Recommendations

The district should:

1. Convert part-time instructional assistant positions to full time when appropriate.
2. Develop alternatives to one-to-one and special circumstance instructional assistants.
3. Ensure that the assignment of additional assistant services always includes a phase-out or exit plan.
4. Develop descriptors of success for the use of instructional assistants in accordance with the IEP.
5. Improve the procedures used when hiring instructional assistants to ensure efficiency and shorter timelines. Identify any breakdowns and delays in the hiring process. Develop a flow chart that includes the following steps to shorten the hiring process.
 - Complete position request
 - Begin recruitment
 - Screen applicants
 - Select applicants to interview
 - Hold interviews
 - Recommend final candidate
 - Offer job to applicant and complete salary placement
 - Department announces selection
 - Complete orientation
6. Ensure that instructional assistants receive the additional training needed to improve efficiency and effectiveness.

Staff Development

Current and past budget constraints have limited opportunities for staff development and extended professional development training. Teachers indicated that release time is no longer provided for them to attend district-sponsored training during the school day. It is not clear what effect the district's 31 instructional planning days have on the ability of special education teachers to access staff development. An assessment to determine the current use of this time and methods to make the time available for district level staff development would significantly improve the ability of all teachers to participate.

Job-alike meeting are scheduled for some groups of employees but are frequently cancelled. Teachers have started to form their own job-alike meetings without district involvement. Job-alike meetings are critical to ensure open communication and dialogue with frontline staff.

The district does not offer its bus drivers any formal training regarding the unique needs of special education students, or training in behavior management or specialized health care issues.

As indicated elsewhere in this report, site principals need training in the legal aspects of special education that affect their leadership of special education programs at their school sites. The psychologists also need training in curricula and state standards. In addition, staff members indicated that they need more Applied Behavior Analysis and Discreet Trial training, as well as refreshers in behavior training and in establishing a curriculum for severely disabled students.

Recommendations

The district should:

1. Establish a calendar of either release time or instructional planning days to provide special education training opportunities for all staff.
2. Complete an assessment to determine how the current instructional planning days are used for special education, and reconfigure their use if warranted.
3. Train bus drivers regarding the needs of special education students. Emphasis should be place on behavior management and safety.
4. Ensure that job-alike meetings occur as scheduled and encourage more such meetings.



Position Control

One of the most critical elements in budgeting for expenditures is accurately projecting employee salary and benefit costs. These costs are the largest part of a school district's budget, averaging approximately 92% of the unrestricted budget in unified school districts throughout California. A reliable position control system establishes positions by site or department and helps prevent overstaffing by ensuring that staffing levels conform to district-approved formulas and standards. To be effective, the position control system must be integrated with other financial modules such as budget and payroll. In addition, position control functions must be separated to ensure proper internal controls. The controls must ensure that only board-authorized positions are entered into the system, that the human resources department hires only employees authorized by the board, and that the payroll staff pay only employees hired for authorized positions. The proper separation of duties is a key factor in creating strong internal controls and a reliable position control system.

In September 2006 the district began using the position control module of the financial and human resource application available to school districts through the Orange County Department of Education (county office). The product, called Integrated Financial Administrative Solution (IFAS), was created by Sungard Bi-Tech and is supported by the county office. The position control module is embedded in the employee/personnel information management application, which interfaces with the custom payroll application developed by the county office and used by the district.

One shortcoming of the existing position control module is the lack of user notification when the maximum number of authorized positions is exceeded. However, the module could be enhanced to restrict positions in excess of the authorized number. As the district's Bi-Tech/IFAS liaison with the county office, the position control technician could provide significant assistance with this process.

Management of position control records and transactions is the joint responsibility of the district's fiscal services and human resources (HR) departments. In particular, the assistant director of fiscal services and the HR department's position control technician share the duties associated with position control management. The position control technician receives supervision and direction from both the director of HR and the assistant director of fiscal services.

The district's personnel action notice (PAN) form is used to initiate, authorize and account for personnel actions such as establishing positions, replacements, and changes that affect existing positions, assignments and employees. This form is the source document used by the HR and fiscal services departments to maintain the electronic personnel information system and its position control data. Various protocols exist for developing and routing the PAN form, depending on the action required.

When PAN forms are submitted properly and on time as required by the district's standard operating procedures, position control is effective because staff in the HR and fiscal

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

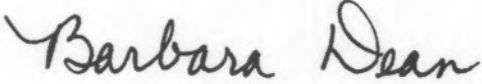
Please print name of contact person: José Banda, Superintendent,
Paul Burkart, Interim Assistant Superintendent,
Rob Coghlan, (incoming) Assistant Superintendent, Administrative Svcs.

Telephone 714 517-7537 FAX

Internet Address pburkart@acsd.k12.ca.us



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



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

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.