



# **Antioch Unified School District**

## **Special Education Review**

April 23, 2010

Joel D. Montero  
Chief Executive Officer





## CSIS California School Information Services

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April 23, 2010

Donald Gill, Ed.D., Superintendent  
Antioch Unified School District  
501 G Street  
Antioch CA 94509

Dear Superintendent Gill,

In December 2009, the Antioch Unified School District 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 programs and services. Specifically, the agreement states that FCMAT will perform the following:

1. Review the special education management information system that interfaces with CASEMIS to determine whether the MIS is operating efficiently and effectively and make recommendations if necessary for improvement of data collection.
2. Nonpublic schools
  - A. Review the process and procedures for placing students in nonpublic schools.
  - B. Compare percentage of student enrolled in nonpublic school from the district to the statewide average and make recommendations for potential alternative district programs.
  - C. Determine the cost effectiveness of nonpublic school placements compared to district alternative programs.
3. Nonpublic Agencies
  - A. Review the process and procedures for placing students in nonpublic agency services.
  - B. Compare percentage of student enrolled in nonpublic agency services from the district to the statewide average and make recommendations for potential alternative district programs.
  - C. Determine the cost effectiveness of nonpublic agency services compared to district-provided services.
4. IEP process  
Determine the training needs of district staff members in critical areas, including but not limited to:
  - Entrance and exit criteria

### FCMAT

Joel D. Montero, Chief Executive Officer

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- Understanding of fiscal resource
  - Transportation as a related service
  - IEP conflict resolution
  - Role of the administrative designee.
5. Review district special education staffing formulas and caseloads and compare with legal requirements and statewide averages.
  6. Conduct analysis of district student study team and RtI models.
  7. Determine if it would be cost effective for the district to operate additional special education programs for students with special needs rather than contracting with the Contra Costa COE to provide certain specialized services. Review the timeline for transfer feasibility.

The attached report contains the study team's findings and recommendations. FCMAT appreciates the opportunity to serve the Antioch Unified School District and thanks all the staff of the district for their cooperation and assistance during fieldwork.

Sincerely,



Joel D. Montero  
Chief Executive Officer

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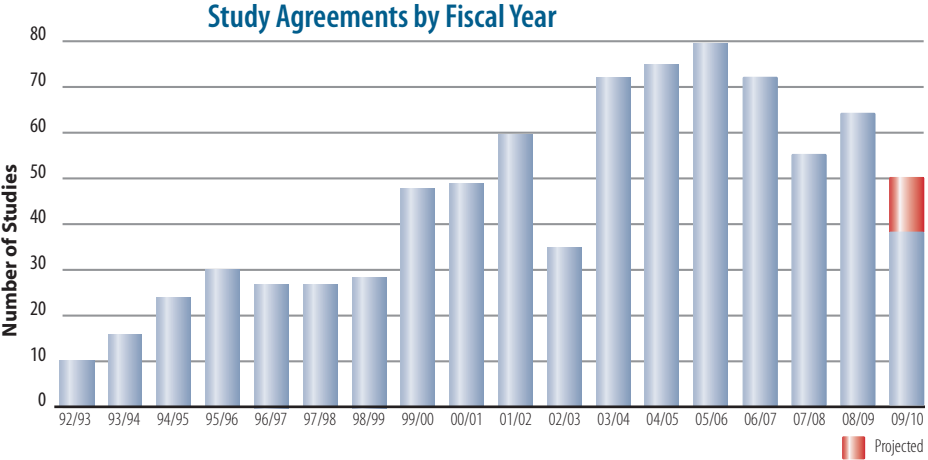
# Foreword - FCMAT Background

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 (LEAs) in complying with fiscal accountability standards.

AB 1200 was established from a need to ensure that LEAs 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.

In January 2006, SB 430 (charter schools) and AB 1366 (community colleges) became law and expanded FCMAT’s services to those types of LEAs.

Since 1992, FCMAT has been engaged to perform nearly 750 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.



<b>Total Number of Studies.....</b>	<b>743</b>
<b>Total Number of Districts in CA.....</b>	<b>1,050</b>
Management Assistance.....	705 (94.886%)
Fiscal Crisis/Emergency .....	38 (5.114%)
Note: Some districts had multiple studies.	
Eight (8) districts have received emergency loans from the state (Rev. 12/8/09)	





# Introduction

## *Background*

The Antioch Unified School District is located in East Contra Costa County along the San Joaquin River and serves more than 19,000 students in grades K-12.

The district has 13 elementary schools, four middle schools, two comprehensive high schools, three specialized high schools, two alternative high schools and one K-8 school. The district has identified 18.3% of its K-12 student population as English Language Learners and 10.1% as students with disabilities.

In December 2009, the Antioch Unified School District requested that FCMAT assist the district by reviewing its special education programs and services. The study agreement specifies that FCMAT will perform the following.

1. Review the special education management information system that interfaces with CASEMIS to determine whether the MIS is operating efficiently and effectively and make recommendations if necessary for improvement of data collection.
2. Nonpublic schools
  - A. Review the process and procedures for placing students in nonpublic schools.
  - D. Compare percentage of student enrolled in nonpublic school from the district to the statewide average and make recommendations for potential alternative district programs.
  - E. Determine the cost effectiveness of nonpublic school placements compared to district alternative programs.
3. Nonpublic Agencies
  - A. Review the process and procedures for placing students in nonpublic agency services.
  - B. Compare percentage of student enrolled in nonpublic agency services from the district to the statewide average and make recommendations for potential alternative district programs.
  - C. Determine the cost effectiveness of nonpublic agency services compared to district-provided services.
4. IEP process  
Determine the training needs of district staff members in critical areas, including but not limited to:
  - Entrance and exit criteria
  - Understanding of fiscal resource

- Transportation as a related service
  - IEP conflict resolution
  - Role of the administrative designee.
5. Review district special education staffing formulas and caseloads and compare with legal requirements and statewide averages.
  6. Conduct analysis of district student study team and RtI models.
  7. Determine if it would be cost effective for the district to operate additional special education programs for students with special needs rather than contracting with the Contra Costa COE to provide certain specialized services. Review the timeline for transfer feasibility.

### ***Study Guidelines***

FCMAT visited the district on January 25, 2010 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. Student Information System
- III. Nonpublic Schools
- IV. Nonpublic Agencies
- IV. Staff Training
- V. Staffing and Caseloads
- VI. Student Study Teams
- VII. Response to Intervention
- VIII. County Office-Operated Programs

## *Study Team*

The study team was composed of the following members:

Bill Gillaspie, Ed.D.  
Chief Management Analyst  
FCMAT  
Bakersfield, CA

Linda Grundhoffer  
FCMAT Consultant  
Danville, CA

JoAnn Murphy  
FCMAT Consultant  
Santee, CA

Timothy W. Purvis\*  
Director of Transportation  
Poway Unified School District  
Poway, CA

Michael Rea\*  
Executive Director  
West County Transportation Agency  
Santa Rosa, CA

Anne Stone  
FCMAT Consultant  
Mission Viejo, CA

John Lotze  
Public Information Specialist  
FCMAT  
Bakersfield, CA

\*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

The Antioch Unified School District serves 2,089 students in special education, or 10% of its total student enrollment. This is the same percentage as the statewide average. The district's general fund contribution to special education during fiscal year 2008-09 was \$6,481,447. Because of California's ongoing fiscal crisis, school districts are forced to examine all programs and departments to determine efficiency and possible cost reductions. In each of the past two years, all of the district's departments have reduced costs by 10%.

The district's student information system and interface with the California Special Education Management Information System (CASEMIS) is not working efficiently. As a result, staff gather student data manually to complete required reporting to the special education local plan area (SELPA). The district's special education department has no ability to make data-driven decisions about programs for students and cannot effectively manage the department's resources without accurate caseload and class size counts. The district plans to correct this problem by implementing IEP PLUS software beginning July 1, 2010.

The district's projected cost for nonpublic school placements for 83 students for fiscal year 2009-10 is \$3,002,015. Although the total cost of nonpublic school placements has not changed significantly over the past four years, it continues to be high; the district has a higher percentage of students in nonpublic schools than most other districts in the Contra Costa SELPA. The nonpublic schools primarily serve students who have autism, emotional disturbances or multiple handicaps. This report includes specific recommendations to increase alternative placement options within the district for these students and thus decrease nonpublic school placements.

The district has made great strides in decreasing the use of nonpublic agency services such as speech therapy and has saved approximately \$156,276 during fiscal year 2009-10. The district should continue efforts to recruit and retain speech therapists, occupational therapists and specialized health care nurses to increase savings in this area.

The current fiscal situation in California hampers the district's ability to provide release time for classified and certificated staff to attend professional development training. The district needs to explore ways for special education staff, site principals and general education teachers to attend critical special education training. The district should consider using minimum days or staff development days.

The district's greatest potential for budget savings is in the area of classified staffing. The district can immediately eliminate \$355,920 in costs by reducing aide support in the resource specialist program (RSP) classes from 100% to 80%, which is the minimum required by Education Code section 56362 (6)(f).

The district operates 54 special day classes (SDCs) and 41 RSP classes. More than 30% of the district's special education students are placed in these most restrictive set-

tings. This is both costly and inconsistent with the federal Individuals with Disabilities Education Act's (IDEA's) requirement that students be placed in the least restrictive environment. FCMAT has provided information regarding alternative models and recommends that the district adjust its program options. This will require additional time but will ultimately provide more appropriate and cost effective programs.

All of the district's instructional aides are full-time employees who receive health and welfare benefits. The cost of benefits ranges from \$7,155 to \$9,000 annually per instructional aide. The district should consider changing six-hour per day aide positions with benefits to two three-hour per day aide positions without benefits for an estimated annual savings of more than \$1 million.

The district also employs 50 one-to-one instructional aides to support individual students, but there is no mechanism in place to monitor the use of these aides or determine the appropriateness of requests for these services. The district should develop and implement procedures for assigning one-to-one aides.

Because the response to intervention (RtI) model is not implemented consistently districtwide, the student study team (SST) process is not as effective as it could be in providing interventions before students are referred to special education. Principals and teachers are willing to implement RtI; however, more training is needed to develop and implement an efficient model.

The district has 215 students in special education programs operated by the Contra Costa County Office of Education. These students typically require intensive programs not available within the district. However, the district could develop and provide programs for approximately 67 of these students and thus reduce excess costs by an estimated \$145,000 annually.

## Findings and Recommendations

### *Student Information System*

School Districts in California are required to maintain special education student information systems that interface with the California Special Education Information System (CASEMIS). State and federal law (E.C. section 56601(a)) provide the California Department of Education (CDE) with the authority to collect statistical, program and fiscal data to enable the CDE to respond to questions from the Legislature and other state and federal agencies regarding special education programs, policies and fiscal issues.

The Contra Costa SELPA is responsible for reporting CASEMIS information to the state. Each district is responsible for submitting accurate data to the SELPA at least twice per year. Two previous special education studies completed by independent consultant Patricia S. Crocker, Ed.D. (March, 2009 and July 2004) indicate that both the SELPA and Contra Costa County Office of Education found that Antioch Unified School District had more problems providing accurate special education student data than any other member district in the SELPA.

The current student information system and interface with CASEMIS is not working efficiently. The district uses a manual process to input data into CASEMIS, including preparing an additional informational sheet and submitting it to the district office staff for entry into a file which is exported to the SELPA for CASEMIS. Instructional aides complete this data sheet but do not always have the required training for this task. This method is time-consuming and only as accurate and efficient as the individuals who input the data.

Instructional aides reported that they spend the majority of their time on paperwork and thus time spent in support of the instructional program for students is reduced. This can affect the special education program's efficiency and effectiveness.

The district does not have an integrated student information system for special education that links with the system for general education, and there is no automated individualized education program (IEP) system. As a result, distinct items of student information reside in separate databases in various district departments including human resources, business, special education and transportation. This duplication of effort reduces the efficiency of all departments and increases costs.

District office administrators have no mechanism for making data-driven decisions regarding program planning. This directly affects caseload management and the distribution of special education resources throughout the district. It also adversely affects planning for programs such as extended school year, which can increase costs.

Each special education student's IEP is maintained at the school that serves that student, and the updated IEP is not always available to district office staff. As a result, the district maintains duplicate files at the district office. This duplication of effort is an inefficient use of staff resources.

The district is aware of the inefficiencies of the current special education student information system and has selected a new student information system called IEP PLUS, which is 100% Web-based and will integrate fully with the new information system used for general education. This will eliminate the need for duplicate files at the district office and improve the integrity of student information in IEPs. Once the new system has been implemented, the district should recognize cost savings in both time and resources. The new system will perform the following:

- Maintain historical student data.
- Allow automation of meeting planning, scheduling, tracking and notification.
- Provide the ability to attach meeting notes to the student records.
- Automate Medi-Cal billing, which should reduce staff time.
- Provide for numerous reports at the site and district level to track IEP time lines, assessments, caseloads and other information.
- Enable the district to integrate special education data with general education data after the new information system for general education is implemented on July 1, 2010.
- Provide consistent and accurate student data for CASEMIS reporting if used properly.

District staff reported that they are required to use SELPA forms for the IEP process (Contra Costa SELPA Policy 6100). However, those forms are not currently available in the IEP PLUS system. The vendor is aware of the district's requirement for these forms and plans to incorporate them into the software; however, the vendor has indicated that this will add to the implementation cost. The district plans to begin implementing the IEP PLUS system as of July 1, 2010; however, the required forms will not yet be available at that time.

### **Recommendations**

*The district should:*

1. Ensure that the IEP PLUS system is implemented successfully and integrated with the district's technology infrastructure, including the following:
  - a. An interface with the information system used in general education.
  - b. Interface with CASEMIS at the SELPA level.
  - c. Maintenance of the IEP PLUS system, including hardware updates.
  - d. Ongoing dialogue between technology department and special education department staff to ensure that the system operates efficiently.
2. Develop a schedule for installing the IEP software.
3. Set firm time lines for the transition and implementation of the IEP PLUS system, and establish and accountability for its use.



4. Ensure that the SELPA forms are incorporated into the IEP PLUS system.
5. Ensure that the IEP PLUS system permits the scanning of documents into the system.
6. Ensure that all staff have access to the hardware needed to fully implement IEP PLUS program.
7. Ensure that principals, teachers and aides receive necessary training in the use of the IEP PLUS system.
8. Define and develop a single, central special education database.



## Nonpublic Schools

According to the California education code, a nonpublic school (NPS) is certified by the California Department of Education (CDE), nonsectarian, and under contract with a public school district. The NPS provides the appropriate facilities, special education, designated instruction and services required by the individual with exceptional needs when no appropriate public education program is available (E.C. section 56345).

The Antioch Unified School District has 83 students in nonpublic schools. The district's special education department reported that many of these students moved into the district with NPS on their IEP and frequently reside in a licensed children's institution (LCI) or foster home. In addition, these students are often moved to another LCI or foster placement outside of the district during the school year. Table 1 shows the number of students in NPS placement and reflects this movement. The district's total annual cost for NPS placements has not changed significantly over the last four years.

**Table 1: Comparison of Antioch USD NPS costs from 2006-present**

Fiscal Year	2006-07 Actual Costs	2007-08 Actual Costs	2008-09 Actual Costs	2009-2010 Projected Costs
Total NPS placements	139	129	140	83
Annual Cost	\$2,858,806.46	\$3,160,912.56	\$3,223,856.10	\$3,002,015.60

The SELPA has a process for districts to request reimbursement for NPS costs that exceed a predetermined threshold or approved amount. The district has requested these funds for one student in both the 2008-09 and 2009-10 fiscal years.

FCMAT compared the district's NPS placements with those of other districts in the Contra Costa SELPA. As shown in Table 2, only two districts, Byron USD and Pittsburg USD, had a higher percentage of students placed in an NPS.

**Table 2: NPS Placements in Contra Costa SELPA**

LEA	NPS placements	% of Special Education Enrollment
Acalanes UHSD	15	3.40
Antioch USD	86	3.49
Brentwood USD	15	1.35
Byron USD	8	5.52
John Swett USD	8	3.21
Knightsen SD	1	1.49
Lafayette SD	2	0.49
Liberty UHSD	26	2.98

Martinez USD	9	1.77
Moraga SD	1	0.57
Oakley UESD	11	1.46
Orinda USD	2	1.03
Pittsburg USD	53	5.02
Walnut Creek SD	3	0.70

NPS placements based on the April 1, 2009 pupil count

In addition, FCMAT contacted four comparable districts regarding their NPS placements. Table 3 compares the total number of NPS placements for Antioch Unified with these four districts as of February 1, 2010.

Among the comparison districts in Table 3, including those with higher enrollment, Antioch has the second highest number of NPS placements. Three of the districts in Table 3 have a significantly high number and percentage of students in NPS placements. This may be because of the number of LCIs and foster homes in the districts, the number of nearby nonpublic schools, and/or the lack of district programs to serve these students.

**Table 3: Comparison of number and percentage of students placed in NPS**

District Name	Total Enrollment, 2008-09	Number of students in NPS	Percentage of students in NPS
Antioch USD	19,422	82	.42%
Hayward USD	22,098	129	.58%
Fairfield/Suisun USD	22,496	80	.35%
Manteca USD	23,077	28	.12%
San Marcos USD	17,852	27	.15%

NPS placements as of February 1, 2010

The district uses the SELPA master contract and the negotiated SELPA rates when placing a student in a NPS. An individual service contract has not been completed for every student in a NPS program.

A representative from the district's special education department, either a coordinator or the social worker, is involved in every NPS placement, including those for students moving into the district with NPS on their IEP. Special education department staff are the case managers for NPS students and attend the IEP meetings. School site staff and administrators do not attend the IEP meetings for students placed in NPS, are often unaware that students from their school are in a NPS, and have no knowledge of the cost of these placements.

The district does not have a written procedure for referring a student for NPS placement. With very few exceptions, when staff at a school site refer students to an NPS it is due

to behavioral issues. Staff reported that referring these students for NPS placement is a long and confusing process. Site staff are not sure what must be completed at the site before a referral is made for placement. Staff indicated that the district's behavior specialist is rarely involved in the referral process, and that the school psychologist was often involved in the referral process in the past but is not involved currently. As a result, students are referred without a functional analysis or a behavior intervention plan, though they do have behavior support plans that are developed by the school site staff with assistance from the special education coordinators.

When a student has moved into the district with NPS on his or her IEP, the district has automatically provided that student with an NPS placement. However, staff report that this is slowly changing: a student is now considered first for a district-operated or county office-operated program. NPS placement is made only if the IEP team determines that a district-operated or county office-operated program is not appropriate or available.

The waiting list for the county office-operated program for students with emotional disturbances (ED) is very long, and staff members reported that the ability to place a new student is affected by the number of openings available. The March 2009 report by independent consultant Patricia S. Crocker Ed.D addressed this issue and stated the following:

The lack of district and SELPA options to serve students with specific emotional and behavioral issues has contributed to nonpublic school placements which are not only costly from a programmatic standpoint, but require long and expensive bus rides and isolate students from the community.

*Contra Costa Special Education SELPA Review*, by Patricia S. Crocker, Ed.D, March 2009

The majority of the district's nonpublic school placements result not from due process cases but from a lack of district-operated programs for students with autism, emotional disturbances and multiple handicaps.

After determining that a student will attend an NPS, the IEP team does not consistently develop a transition plan or goals to return the student to a district-operated or county office-operated program. This is due to a lack of district programs and a lack of formal written procedures for transition planning when a student enters the district.

When the district considers developing programs for students currently in a NPS, it will need to consider facilities, staffing, equipment, support services, training and operating costs.

Tables 4 and 5 compare the cost of certain district-operated programs with the cost of comparable NPS services. Table 4 compares costs for autistic preschool students, 16 of whom attend a specific NPS. Staff members indicated that these placements were made primarily because the district's preschool programs do not incorporate the methods required for these students. Requirements include the picture exchange program (PECS), which is one method recommended for autistic students and is incorporated into the NPS

program. To successfully replace the NPS program, the district must provide a similar or more intensive program.

**Table 4: Cost of district preschool autism program for 12 students compared to cost of NPS program**

<b>Staffing</b>	<b>#FTE</b>	<b>Average Salary</b>	<b>Total Salary</b>
Teachers	1.0	\$70,224.00	\$70,224.00
Aides	1.5	38,010.00	57,015.00
Speech Therapist	0.2	95,362.00	19,072.40
Psychologist	0.2	95,362.00	19,072.40
Behaviorist	0.1	95,362.00	9,536.20
<b>Total Staffing</b>			<b>\$174,920.00</b>
<b>Program Support Costs</b>			
Materials/Equipment			\$3,000.00
General Operating 5.4%	5.4%		18,912.22
<b>Total</b>			<b>\$21,912.22</b>
<b>Total Combined</b>			<b>\$196,832.22</b>
<b>Estimated Start up costs</b>			
Furniture/Equipment			\$10,000.00
Materials/Supplies			\$7,000.00
<b>Total start up costs</b>			<b>\$17,000.00</b>
<b>Total cost for program year one</b>			<b>\$213,832.22</b>
<b>Annual Cost for 12 students in NPS</b>			<b>\$319,200.00</b>
<b>\$26,660/student</b>			
<b>First year savings</b>			<b>\$105,367.78</b>

Table 4 assumes the district will no longer have 12 students in the NPS program, and does not calculate the cost of continuing to place students in the NPS. The salary costs are based on average costs for each classification as of January 21, 2010. Transportation costs are not included in the analysis. Preschool autism programs typically require related services such as speech therapy, and behavioral interventions, so these items are included.

Additional psychologist time has also been included in the calculation. The staffing and salaries allotted will alter this calculation.

The district could realize the greatest cost savings by incorporating the methods used in the NPS program into its own current preschool classes, thus eliminating the need for a new class. However, if this is not possible or if existing classes are at capacity, it is likely that a savings could still be realized if the district were to develop a program with the appropriate staffing, facilities and methods.

FCMAT also compared the cost of current NPS services for 12 of the district's emotionally disturbed (ED) students with the cost of developing and implementing a comparable district-operated program. This data is provided in Table 5.

*Table 5: Cost of district class for 12 ED students compared to cost of NPS program*

<b>Staffing</b>	<b>#FTE</b>	<b>Average Salary</b>	<b>Total Salary</b>
Teachers	1.0	\$70,224.00	\$70,224.00
Aides	2.0	38,010.00	76,020.00
Psychologist	0.4	95,362.00	38,144.80
<b>Total Staffing</b>			<b>\$184,388.80</b>
<b>Program Support Costs</b>			
Materials/Equipment			\$3,000.00
General Operating 5.4%			19,927.28
<b>Total</b>			<b>\$22,927.28</b>
<b>Total Combined</b>			<b>\$207,316.08</b>
<b>Estimated Start up costs</b>			
Materials/Supplies			7,000.00
<b>Total start up costs</b>			<b>\$7,000.00</b>
<b>Total cost for program year one</b>			<b>\$214,316.08</b>
<b>Cost for 12 students in NPS</b>			<b>\$332,640.00</b>
<b>\$27,720.00</b>			
<b>First year savings</b>			<b>\$118,323.92</b>

Data is based on average salaries in the district's current salary schedule; it does not include health and welfare benefit costs.

Table 5 assumes that the district will no longer have 12 students in the NPS program and does not calculate the cost of continuing to place students in the NPS. The salary costs are based on average costs for each classification as of January 21, 2010. Transportation costs are not included. The NPS programs for these students include counseling, some type of token system for behavior, and highly structured whole class and individual behavior plans. Additional aide support and psychologist time is built into the calculation in Table 5. The staffing and salaries allotted will alter this calculation.

As with the class for autistic preschool students, there are numerous variations of student attendance that would affect the calculation in Table 5, including additional referrals for the ED program in addition to the 12 students, less than 12 students in the district-operated program, continuing to have 12 students in the NPS, or having no students in the NPS.

Additional factors that the district must consider include its ability to recruit and retain qualified staff; special education and general education staff training and how that will be provided; and the inclusion of parents in the transition process.

### **Recommendations**

*The district should:*

1. Continue to access additional SELPA funds for NPS contracts that surpass the SELPA threshold.
2. Continue to use the SELPA contract, negotiated rates and the state certification list for all NPS placements.
3. Develop an individual service contract for each NPS student to ensure that the student is receiving the services required and that the district is not paying for services that are not required.
4. Continue to use district special education staff as the NPS case carriers.
5. Ensure that school site administrators are aware of all of their students who are placed in a NPS and the cost of those placements.
6. Develop written procedures for students who enter the district with NPS on their IEP. These procedures should include the following:
  - a. A thorough and documented review of the student's file by district special education staff to explore any district-operated or county office-operated programs that could meet the student's needs.
  - b. An IEP meeting at the student's school of residence regarding the student's interim placement in a district-operated program, county office-operated program or NPS program. This would enable the school to be aware of the student and to help plan the student's return to a district-operated program if such a program should become available.



- c. Ensure that the initial placement IEP and all future IEPs include goals and a transition plan to return the student to a district-operated program to provide placement in the least restrictive environment.
  - d. Ensure that the student's school of attendance, or school to which the student may transition, is represented at the NPS IEP meetings.
7. Develop written procedures for referring students from a school site to a NPS program because of behavioral issues. These procedures should include the following:
  - a. A behavior support plan (BSP) to ameliorate the behavioral difficulties that are keeping the student from being successful in their current program. The district's behavior specialist should assist with this as needed.
  - b. A behavior intervention plan with a functional analysis, as needed, if the BSP has not been successful.
  - c. Documentation of counseling at the school site, or through mental health or other facilities, to support the need for NPS placement.
  - d. A time line for implementation of the behavior plans.
  - e. The appropriate contact personnel in the special education office.
  - f. Ensure that the initial placement IEP and all future IEPs include goals and a transition plan to return the student to a district-operated program to provide placement in the least restrictive environment.
  - g. Ensure that the student's school of attendance, or school to which the student may transition, is represented at the NPS IEP meetings.
8. Provide appropriate staff members with in-service training regarding written procedures for students who enter the district with NPS on their IEP.
9. Develop current preschool programs to meet the needs of autistic preschool students or, if this is not possible, open one class for autistic preschool students for 2010-11 with programs and services comparable to those currently provided by the NPS.
10. For 2010-11, develop one or more classes for ED students comparable to the program they are currently receiving.
12. Use American Recovery and Reinvestment Act of 2009 (ARRA) funds to pay the startup costs for these new classes.



## Nonpublic Agencies

California Education Code section 56035 defines a nonpublic, nonsectarian agency as an agency certified by the California Department of Education (CDE) that meets the following definition:

...a private, nonsectarian establishment or individual that provides related services necessary for an individual with exceptional needs to benefit educationally from the pupils' educational program pursuant to an individualized education program..."

The estimated total annual cost of the district's contracts with nonpublic agencies (NPAs) for fiscal year 2009-10 is projected at \$657,128. FCMAT reviewed contracts for individual students that include nursing services, and contracts for agencies or individuals receiving speech therapy and occupational therapy.

The data in Table 6 indicates that the total number of students receiving NPA services has declined over the past four years because of an increase in the district's staff. Some costs for individual student contracts have increased due to the nature of the specific contracts. Medi-Cal reimbursements are used to pay for some NPA costs.

**Table 6: NPA students and NPA speech costs, 2006-present**

	2006-07	2007-08	2008-09	2009-2010
Number of NPA students	55	57	39	33
Other Services costs	\$399,133.00	\$400,815.00	\$280,949.50	Estimated \$391,088.00
NPA Speech cost	\$592,878.00	\$821,993.00	\$532,455.00	Estimated \$266,040.00
Total cost*	\$992,011.00	\$1,222,808.00	\$813,404.50	Estimated \$657,128.00

\*The increase of \$110,139 is due to the rising cost of NPA services, even though the number of students receiving services has declined by six.

The district does not have any written procedures to assist staff in determining a student's need for an NPA service or whether the service could be provided by district staff. A few students are receiving NPA services as a result of due process or mediated agreements, and a few students will continue to require NPA services because of their unique needs. In the latter case, NPA services are more cost effective than hiring district staff.

The Contra Costa County Office of Education (county office) has speech therapists and occupational therapists who can be contracted by the district. The county office has also worked with several districts to split an employee's time between the districts and thus reduce reliance on NPAs. The Antioch Unified School District has not yet explored these options.

The district has been proactive in recruiting and retaining speech therapists and as a result has decreased its dependence on NPA speech services. The district is also hiring speech and language therapy assistants but has not hired any certified occupational therapy assistants. Certified occupational therapy assistants cannot perform student assessments but can provide therapy under the supervision of an occupational therapist. This can enable the occupational therapist to increase their caseload and thus reduce a district's reliance on NPAs and the county office.

**Table 7 Comparison of replacing NPA staff with district staff.**

	<b>Speech Therapist Annual Costs</b>	<b>Occupational Therapist Annual Cost</b>
NPA	1.7 FTE = \$176,040	0.5 FTE = \$60,000
District	1.7 FTE = \$162,115	0.5 FTE = \$50,248
Projected Savings	\$13,925	\$9,752

The salary costs are based on average costs in each classification as of January 21, 2010.

### **Recommendations**

*The district should:*

1. Continue using the Medi-Cal funds for certain NPA costs.
2. Develop written procedures for determining if a student requires a related service that the district cannot provide, such as occupational therapy, nursing or transportation. The procedures should include the following:
  - a. Use of an IEP team to determine the need for the services and refer the student to district personnel.
  - b. Involvement by district personnel to evaluate the need for the services, determine if the student is eligible and determine whether the district can provide the services.
  - c. Involvement by the district office special education staff in the student's IEP to ensure that no other district providers can meet the student's IEP goals.
  - d. Inclusion of a fading plan and goals in the student's IEP to reduce the need for NPA services.
  - e. Continued monitoring of the NPA contract by district office special education staff to ensure a transition to district-operated services as soon as appropriate.
  - f. Scheduled In-service training for appropriate staff regarding these procedures.
3. Contact the county office to determine the availability of speech therapists, occupational therapists and nurses to reduce the district's reliance on NPAs.

4. Continue to actively recruit staff in the areas of speech therapy and occupational therapy to reduce reliance on NPA and county office services.
5. Consider hiring a certified occupational therapy assistant.



## ***Staff Training***

The Contra Costa SELPA offers numerous free staff development opportunities in instructional methodologies and behavior management. Specific training in the IEP process is also available. The district's special education staff reported that there are limited opportunities to attend training regarding special education. The state's current fiscal situation makes it difficult for districts to release teachers to attend essential professional development.

Teachers reported that they need training in meeting the needs of students with autism and emotional disturbances. Both general and special education teachers need training in behavior management and differentiated instruction in the core curriculum. Instructional aides reported a need for training in behavior management, understanding disabilities, and instructional methods. In addition, staff indicated a need for training in the IEP process and paperwork to complete the evaluation process.

Site principals reported that they need professional development training in the legal aspects of special education and clarification of their role as the administrative designee at IEP meetings. The current process does not make clear which employee has the authority to make decisions that have fiscal impacts on the district. Principals also reported that they have a limited understanding of the fiscal impact of special education on the general education budget. Transportation as a related service on the IEP is also an area in which all administrative designees need immediate training.

## ***Recommendations***

*The district should:*

1. Designate some staff development time to be provided during district minimum days to ensure special education staff training and eliminate excess costs for release days.
2. Provide training for site administrators to serve as administrative designees for special education IEP meetings and empower them to make decisions regarding IEPs.
3. Provide administrators with training in the fiscal and program implications of IEP decisions.
4. Set priorities for training requirements for general and special education teachers and develop a sequence of training opportunities each year.
5. Request that the SELPA staff provide all of the district's special education staff with customized training in IEP compliance and procedures.





## Staffing and Caseloads

All of the district's resource specialists have six hours of instructional aide time, which exceeds the legal requirement. California Education Code Section 56362 (6) (f) states, "at least 80% of the resource specialists within a local plan shall be provided with an instructional aide" Reducing the use of instructional aides in this area by 20% in accord with the legal minimum would save the district \$355,920 in fiscal year 2009-10.

The maximum legal caseload per resource specialist is 28 students (EC section 56362(6) (c)). The district has an average caseload of 24 students per resource specialist. The district and the Antioch Education Association have agreed that if resource specialist caseloads exceed 28 at the secondary level, they will permit secondary teachers to teach six periods per day rather than five. The compensation for this additional assignment is 20% of the teacher's daily rate of pay for the length of the assignment. The district's total cost for this option in fiscal year 2008-09 was \$63,096.

The district's average caseload for adaptive physical education (APE) is 31 students compared to the statewide industry norm of 55 reported by School Services of California (SSC), which has provided school districts with data since 1975 and is an industry-standard source of information in California. Reducing APE staffing by 0.5 full time equivalent positions (FTE), could save the district approximately \$32,000 per year.

The district's current caseloads for speech therapists exceed both the requirements in California Education Code sections 56363.3 and 56441.7 and the caseload guidelines provided by SSC, as indicated in Table 8.

In December 2006, the district negotiated a memorandum of understanding (MOU) for speech therapists that defines changes in speech therapists' work day, work year, salary and caseloads. The MOU establishes the caseload for speech therapists working with school age students at 66 to 76 students and sets the preschool caseload maximum at 48 students. The district also employs speech and language assistants.

**Table 8: Comparison of legal requirements, state guidelines and district practice**

Speech and Language	California Ed Code	Guidelines (SSC)	Antioch MOU
Preschool Speech Therapy	(EC 56441.7) 40 students	40 students	48 students
K-12 Speech Therapy	(EC 56363.3)	55 average	66-76 students

Staffing ratios for pupil personnel in California are collected annually and are available in the California Basic Education Data System (CBEDS). This provides districts with comparison data for use when developing staffing formulas. District and statewide figures are provided in Table 9 below.

**Table 9: District and statewide ratios of students to psychologists, nurses and social works, 2007-08**

Pupil Personnel	California	Antioch
Psychologists	1328:1	1885:1
Nurses	2219:1	19,422:1*
Social Worker	15,652:1	19,422:1**

California Basic Education Data System (CBEDS) 2007-08.

\*The Antioch Unified School District uses a consultation model for health services.

\*\*The social worker employed by the district works only with special education students.

As indicated in Table 9, the statewide average ratio of students to psychologists in 2007-08 was 1,328:1, but the district's ratio was 1,885:1. This data indicates that the district is understaffed by 4.0 FTE psychologist positions.

The district's psychologists' primary responsibilities are initial and triennial assessments for special education; case management for special day class students; IEP management; and designated instruction and services (DIS) counseling for special education students. The psychologists reported that their ability to perform DIS counseling is impeded by their case management duties, which are time-intensive. As a result, little or no intervention support can be provided in the general education setting. California's current fiscal crisis prohibits the district from increasing the number of psychologists on staff; however, the district should re-evaluate their role as case managers for special day class students.

The district has one school nurse and provides health services using a consultation model, with the nurse providing guidance and support to school sites. Specialized health care for special education students is provided by nonpublic agencies. The district has one social worker whose primary responsibilities are in special education. Because of the unique nature of these two employees' duties, the data in Table 9 may not be useful in developing a staffing plan for this district. The state's fiscal situation makes it unfeasible for the district to increase social worker or nursing staff at this time.

The district operates 54 special day classes and 41 resource specialist classes. FCMAT reviewed the size of special day classes for students with mild to moderate disabilities and for students moderate to severe disabilities and compared them to the statewide averages reported by SSC. Table 10 below contains this data, which indicates that the sizes of the district's special day classes are consistent with the SSC guidelines

**Table 10: Comparison of guidelines for SDC classes vs. district practice**

Special Day Classes	Guidelines	District Practice
Mild to Moderate (Elementary)	12 students, 1 aide	12 students, 1 aide
Mild to Moderate (Secondary)	12-15 students, 1 aide	14 students, 1 aide
Moderate to Severe (Elementary)	8-10 students, 2 aides	8-10 students, 2 aides
Moderate to Severe (Secondary)	10-12 students, 2 aides	12 students, 2 aides

Guidelines from School Services Inc; District Practice from current class configurations 2009-10.

More than 30% of the district’s special education students are placed in a special day class, which is the most restrictive option. No data was available regarding the amount of time students receive special education services in this type of setting. The district should seek assistance from the SELPA to determine the amount and percentage of time students are receiving special education services in special day classes and evaluate the efficiency of the current program structure. Operating special day classes of 10-15 students per class is costly, particularly if students are not receiving special education services for the majority of the school day.

Some school districts, such as Los Angeles Unified, have developed a learning center model based on diagnostic assessments, monitoring systems and standards-based instruction in the core curriculum. This model provides opportunities to expand services to students and avoid restrictive placements. A copy of the *Effective Indicators for Learning Centers* document from the Los Angeles USD model has been shared with all SELPAs and is included in Appendix A of this report.

The average caseload for the district’s occupational therapists is 26 students. The state-wide guideline established by SSC is 20-35 students and there are no statutory caseload limits. The district should closely review the frequency and duration of occupational therapy services on students’ IEPs. In cases where “consultation only” is indicated, the caseloads could be increased.

### **Recommendations**

*The district should:*

1. Consider reducing instructional aide support staffing for resource specialists to the minimum requirement in Education Code section 56362 (6(f).
2. Consider reducing APE staffing by 0.5 FTE for an annual savings of \$32,000.
3. Eliminate case management for special day class students from the psychologists’ duties and consider assigning this task to the special day class teachers.
4. Ensure that the district is in compliance with the provisions for DIS counseling in individual student IEPs.

5. Review the current program structure and determine the most efficient and effective method of serving students in the least restrictive environment.
6. Contact other districts (e.g., Los Angeles Unified School District) who have redesigned program delivery options to include learning centers, which can increase the amount of time students spend in the least restrictive environment.
7. Review the frequency and duration of occupational therapy services on IEPs to determine the appropriate caseload limit in this area.

### *Instructional Aides*

Throughout California, the number of districts using instructional aides, one-to-one aides and special circumstance instructional aides has increased dramatically over the past few years. This staffing increase has put a strain on special education budgets and increased contributions from the general fund, especially in situations in which the services are not warranted or monitored to contain costs.

The only way for a district to determine if these services are appropriate is to establish and implement guidelines, policies and procedures, including strictly enforced monitoring to prevent these services from being granted unnecessarily. The district does not have such guidelines for one-to-one instructional aides.

The district employs 50 one-to-one instructional aides in special education. IEP teams do not continually monitor whether these services continue to be warranted, and staff reported that once these services are included on a student's IEP they continue throughout the student's educational career. Most school districts usually use one-to-one aides for temporary special circumstances, not as a permanent service.

Procedural guidelines can assist the district when parents and advocates challenge the district for such services. Extensive training must follow the development and implementation of guidelines; administrators and general and special education staff should attend mandatory training regarding their use. Guidelines can help staff determine the following:

- The need for one-on-one instructional aides
- Dependence factors
- Measurable outcomes
- Descriptors of success
- Alternatives to one-on-one instructional aides
- Whether existing resources are being used optimally
- Evaluation of the continuing need for such services
- When to add hours to an existing aide's contract

Rather than the term "one-to-one aide," many school district use the term "special circumstances instructional aide" because it indicates that the assignment is temporary in nature and should be faded (phased out) after a certain predetermined time. Sample

guidelines that include use of this term are included in Appendix B. Fading of services is crucial to helping students gain independence. The district does not currently use fading strategies for instructional aide support. The district should review any restrictions in the collective bargaining process when reviewing this option.

No specific staff member in the district's special education department has been given the responsibility of reviewing the use of aides and analyzing student needs. Policies and procedures should clearly define the role of the special education director, special education staff and school administrators. After policies and procedures are implemented, the district will need to review all instructional aide placements. One-to-one aides is an area in which districts can often use resources more effectively and reduce costs.

All of the district's instructional aide positions are six hours per day and include health and welfare benefits. The cost of these benefits can range from \$7,155 to \$9,000 annually per instructional aide. Changing each of the six-hour per day positions to two three-hour per day positions to eliminate benefits would reduce costs by more than \$1 million per year.

### ***Preschool Memorandum of Understanding (MOU)***

In the fall of 2009, the district developed an MOU with the Antioch Education Association and preschool special education teachers. Some of the provisions in the MOU have fiscal implications for the district, including the following:

- Guarantee of 20 additional days of extended school year (ESY). This could be problematic if the district does not have the special education enrollment to support the level of staffing to which it is obligated.
- The district may also experience an additional fiscal impact if other special education staff members request a similar contractual guarantee of 20 additional ESY days
- Limits on the district's ability to make changes in the preschool program's structure. There are times when students' unique needs require program adjustment. This inflexibility will result in costly placements outside the district for students who cannot access the appropriate programs that should be available in the district.

### ***Recommendations***

*The district should:*

1. Consider using the term "special circumstance instructional aide" and developing guidelines regarding this.
2. Develop policies and procedures for assigning, supporting, reducing, and discontinuing aide services.
3. Assess the continuing need for instructional and one-to-one aides.

4. Ensure that a fading plan for aide support is developed at IEP meetings.
5. Identify specific staff members responsible for analyzing student needs and the use of instructional aides.
6. Clearly define the roles of the special education director, special education staff and school site administrators with regard to instructional aides.
7. Ensure that the placement of aides is a good fit for the student and staff.
8. Ensure that school site principals are included in the entire process related to aides.
9. Consider changing each six-hour per day aide positions to two three-hour per day positions.
10. Consider renegotiating the preschool MOU with the appropriate collective bargaining group representatives.

## *Student Study Teams*

Student study teams (SSTs) have been a part of the district's general education process for many years. New models of SSTs have emerged as research-based interventions, ongoing monitoring and data-drive methods of assessing student needs have increased achievement among students at risk.

Although the district has developed an SST binder with forms, the SST process varies from site to site, with no districtwide consistency. The district does not have a board policy regarding SSTs. The sites do not collect data regarding the SST process, and there are no district guidelines to define what constitutes success in this area. District staff reported that some sites have SSTs that meet regularly, some SSTs include special educators, many sites keep individual students' information in a hard copy format, and the data used to determine the need for assessment varies from site to site. Because of this lack of consistency, the same student could be referred for assessment at one school site and not referred at another.

The SST process is not intended to be a hurdle that must be cleared to refer a student for special education assessment, but a forum to assist students at the school site so they can succeed without special education services. Although there are no state guidelines regarding the percentage of students referred to special education from an SST, most students referred to an SST will not be assessed for special education if the SST is used as intended. However, staff reported that this is not the case with the district's SSTs because nearly all students referred to the SSTs are found to need assessment for special education eligibility.

Effective SSTs do the following:

- Identify and assist students.
- Help teachers solve problems with students using the collective expertise of other appropriate professionals.
- Help parents when they have concerns.
- Help students who request additional support.
- Improve communication between staff members and between the school and the home.
- Increase staff commitment to students and to the educational program.
- Facilitate referrals to the general education programs at a school site.
- Coordinate services a student receives.
- Document the use of scientific interventions and peer-reviewed research.
- Explain the response to instruction and intervention (RtI2) model, if used, and review progress under this model.
- Attempt to document all reasonable interventions before referring a student to be assessed for special education eligibility.

The San Joaquin County Office of Education has developed an excellent SST handbook that is available on its Web site and may be of assistance to the district.

In addition to students with academic issues, school sites reported that students with behavioral issues are often referred to special education because the school site staff do not believe that they have the skills, support or responsibility to serve these students. Staff also reported that the student study team process is circumvented when a parent submits a written request for assessment.

### ***Recommendations***

*The district should:*

1. Develop a board policy and administrative regulation regarding SSTs.
2. Continue using the existing forms for SSTs
3. Schedule ongoing training for new and existing staff members.
4. Establish a consistent districtwide SST process. Consider using the San Joaquin County Office of Education SST handbook to assist with this.
5. Train staff at all sites in the SST process.
6. Ensure that the districtwide SST process incorporates consistent documentation that includes the following information:
  - a. The levels of Response to Intervention (RtI) operating at the school.
  - b. The data collected through RtI and other districtwide assessments.
  - c. The criteria for referring a student for a special education assessment.
  - d. Data from all sites to determine the effectiveness of the SST process, including the following:
    - i. The number of students discussed at SSTs.
    - ii. The number of students assessed for special education.
    - iii. The number of students found eligible for special education as a result of assessment.
  - e. The number of English-learner students referred for special education assessment.
  - f. The number of English learner students found eligible for special education.
  - g. Data regarding interventions at the school and their success.
7. Use the data listed in recommendation 6 above to improve the SST process.
8. Provide both schoolwide and classroom-specific behavioral techniques so teachers and site administrators can become more confident in their skills at managing difficult behaviors.



9. When a parent submits a written request for assessment, immediately convene an SST meeting. The meeting must be held within 15 calendar days (with some exceptions due to school breaks of more than 5 school days). Use this meeting as an opportunity to discuss and resolve the parent's concerns.



## *Response to Intervention*

A letter from California Superintendent of Public Instruction (SPI) Jack O'Connell in 2008 and information from the California Department of Education (CDE) provided in 2009 defines response to instruction and intervention (RtI2) as a “systematic, data-driven approach to instruction that benefits every student.”

The CDE information further states the following

California has expanded the notion of Response to Intervention to RtI2. RtI2 is meant to communicate the full spectrum of instruction, from general core, to supplemental or intensive, to meet the academic and behavioral needs of students. RtI2 integrates resources from general education, categorical programs, and special education through a comprehensive system of core instruction and interventions to benefit every student.

Source: <http://www.cde.ca.gov/ci/cr/ro/rtiphilosophydefine.asp>

### *Core Components*

In an attachment to the 2008 letter and in a document titled *Determining Specific Learning Disability Eligibility Using Response to Instruction and Intervention (RtI2)*, the CDE lists and elaborates on the following critical core components of RtI2:

1. High-quality classroom instruction.
2. Research-based instruction.
3. Universal screening.
4. Continuous classroom progress monitoring.
5. Research-based interventions.
6. Progress monitoring during instruction and interventions.
7. Fidelity of program implementation.
8. Staff development and collaboration.
9. Parent involvement.
10. Specific learning disability determination.

Source: <http://www.cde.ca.gov/nr/el/le/yr2008ltr114att.asp>; also, *Determining Specific Learning Disability Eligibility Using Response to Instruction and Intervention (RtI2)*, California Department of Education, Sacramento, 2009. This document is available online at <http://www.cde.ca.gov/sp/se/sr/documents/sldeligibilityrti2doc>.

The CDE document cited above further states that RtI is used in the following three ways:

1. Prevention:  
All students are screened to determine their level of performance in relation to grade-level benchmarks, standards, and potential indicators of academic and behavioral difficulties. Rather than wait for students to fail, schools provide research-based instruction within general education.
2. Intervention:  
Based on frequent progress monitoring, interventions are provided for general education students not progressing at a rate or level of achievement commensurate with their peers. These students are then selected to receive more intense interventions.
3. Component of specific learning disability (SLD) determination:  
The RtI2 approach can be one component of SLD determination as addressed in the Individuals with Disabilities Education Act (IDEA) 2004 statute and regulations. The data from the RtI2 process may be used to demonstrate that a student has received research-based instruction and interventions as part of the eligibility determination process.

The CDE is in the process of further defining how RtI2 could be used in the eligibility process.

### *Levels of Intervention*

The CDE document titled *Determining Specific Learning Disability Eligibility Using Response to Instruction and Intervention (RtI2)* delineates three levels of need for intervention. Tier 1 needs are at the benchmark level and require core instructional programs with screening and targeted instruction. These interventions are highly structured and have a high probability of producing positive results for large numbers of students.

Tier II needs are at a strategic level and require targeted short-term interventions in addition to the core instructional program. This supplemental program is provided to students who have not responded with appropriate growth to the Tier I targeted instruction. Tier II interventions may be discontinued for students who improve in critical academic or behavioral measures as a result of the intervention. Some students may exhibit progress but continue to need the Tier II supplemental supports. Those students who fail to display meaningful progress in Tier II interventions are considered for more intensive interventions in Tier III.

Tier III needs require interventions with greater intensity. This can be accomplished by modifying the intervention's frequency, duration or teacher-student ratio, or any combination of the three.

The document's guidelines indicate that students who do not respond to the above targeted interventions can be referred for evaluation to determine whether they are eligible for special education services under the specific learning disability (SLD) category. Data

regarding the student’s response to the RtI2 interventions are used to help determine eligibility.

***RtI in the Antioch School District***

Site administrators reported that the district provided and they attended a brief presentation on RtI some time ago. Some site administrators have attended other presentations or have gathered information on RtI by other means. However, there was a general consensus that the administrators’ knowledge of RtI is limited and that both the general education and special education teachers have had little or no training in RtI. The district has no RtI2 training in place.

In addition, there is a districtwide lack of necessary state-approved supplemental intervention programs, which are a major component of RtI<sup>2</sup> and are used as part of the tiered model described above. Although some school sites are using supplemental intervention programs, the sites are not using data consistently to determine which students need which programs. Further, no sites have the materials, resources, and training needed to operate RtI<sup>2</sup>. At a recent principals’ meeting, the principals expressed their concern about RtI and asked for assistance in understanding what RtI is and how teachers will be provided with the resources to implement this type of model.

General education should always be the first intervention strategy and should also take the lead in implementing RtI<sup>2</sup>. For this model to be successful, the district must join in a collaborative effort with all general and special education staff members to address the students’ academic and behavioral needs.

The role of special education in RtI <sup>2</sup> varies from site to site. At some sites, special education is provided using the tradition pull-out and separate program model; at some sites the resource specialist works in a pull-out or push-in program with students who have not been identified; and at some sites the special educators provide instruction to a group of students in leveled academic programs. During an assessment for special education, information regarding a student’s response to intervention comes from the individual site team.

The percentage of the district’s students identified as having a disability has been consistent over the past three years and is in line with the statewide identification rate.

***Table 11: Percentage of students identified as having a disability.***

Year	Statewide	Antioch USD
2006-07	10%	10.4%
2007-08	10.3%	10%
2008-09	10%	10.1%

### ***Recommendations***

*The district should:*

1. Develop a master plan for staff training and implementation of RtI<sup>2</sup>.
2. Ensure that all schools and all teachers have access to researched-based instruction and interventions.
3. Evaluate the current supplemental programs to determine their effectiveness and decide which programs should be included in the districtwide implementation of RtI.
4. Ensure that all schools have appropriate state-approved supplemental intervention programs for Tier II and Tier III.
5. Determine whether the current data collection system for monitoring students' needs and progress is efficient and effective; if it is not, determine what student monitoring system is needed.
6. Ensure that administrators, general education teachers and special education teachers receive extensive training in assessments, data analysis, programs, and researched-based instructional practices and strategies to ensure that RtI<sup>2</sup> is a collaborative system of instruction.
7. Review the special educators' role in providing instruction to both identified and non-identified students, and determine how special education will be provided at each school.
8. Determine how RtI will be used to help determine eligibility for a specific learning disability, and train school psychologists and special educators in this process.
9. Examine the district's identification rates for students with disabilities annually to determine if RtI programs are helping reduce them.

## *County Office-Operated Programs*

The district has 215 students in programs operated by the Contra Costa County Office of Education (county office). The base cost for each of these students is \$24,655, resulting in a total projected base cost of \$5,300,825 for fiscal year 2009-2010. The costs of any additional services a student may require in accord with their IEP are billed back to the district.

Staff report that students are referred to county office-operated programs when the district does not have a program to meet the students' needs. The number of students in county office-operated programs has remained relatively consistent over the last four years, ranging from 215 to 225. Many of the students in county office-operated programs have significant disabilities, including medically fragile and multiply handicapped students. In addition, many have significant behavioral challenges that the school sites do not feel equipped to handle. The district cannot easily duplicate the level of support needed to educate the most severely handicapped students. However, there are a sufficient number of students with less severe disabilities in each of the county office-operated programs to warrant at least one district-operated class. These include the following:

- 26 students ages 18-22 in community-based instruction.
- 35 students in classes for students who are emotionally disturbed and have acting out behaviors.
- 12 students in classes for elementary school age autistic students.

Program transfers from one agency to another are governed by Education Code section 56209 and require considerable time, planning and analysis. In addition to Education Code requirements, the Contra Costa SELPA has requirements regarding program transfers in its Policy 3100, section 12d. These include the requirement to notify the SELPA of the intent to transfer a program 18 months prior to the intended transfer date, or by December 1, which is the legal requirement (the Education Code includes the ability to adjust time lines if both parties and the SELPA governance council agree). The SELPA policy specifies how the county office and the district will be funded for a class at the time of the transfer and penalties that may be imposed on the requesting district if the program is not transferred. The SELPA's local plan, including Policy 3100 12d, can be found at the following Web site address: <http://www.cccoe.k12.ca.us/selpa/publications/Local%20Plan%206-07.pdf>.

The county office has opened up one new class this school year to serve students with disabilities similar to those of students the district currently sends to a nonpublic school. It may be possible for the district to work with the county office to transfer some of those NPS students to this county office-operated program and in turn transfer some students from this county office-operated program to a district program.

Any changes the district makes in the programs and services for its students who are in county office-operated programs will affect not only the district but also the county office and the other member districts in the SELPA. This should not deter the district from

moving forward, but it does make it imperative that the district maintain clear communication with the SELPA and the county office to ensure effective planning

The district must consider several factors when deciding whether it will request program transfers from the county office, implement its own programs to prevent additional referrals to a county office-operated program, implement a combination of these two options, or implement neither option. The factors listed below are similar to those discussed in the section of this report that addresses nonpublic schools and are important for both short-term and long-term planning.

The following factors do not constitute a comprehensive list but offer points of discussion that cover most of the programs currently operated by county office.

#### *Facilities*

Medically fragile students and students with multiple disabilities may require specialized facilities with additional wheelchair access and larger rooms to accommodate equipment. Other classes such as community-based instruction may be held in a district classroom or in a storefront. Classes for emotionally disturbed students with acting out behaviors may need additional space for counseling. Classes for autistic students may need playground access, close proximity to bathrooms, and additional space because of the higher student-to-teacher ratio.

#### *Staffing and Equipment*

Medically fragile students and students with multiple disabilities may need intensive nursing services, staff trained in medical procedures, and a very low student-to-adult ratio. These classes may also need equipment not typically found in special education classrooms.

Community-based instruction classes are usually staffed with additional aide support to enable the students to develop skills in transportation, recreation and employment. These classes no longer need standard curricula and equipment but focus on developing life skills.

Classes for emotionally disturbed students require staff trained in behavioral techniques and a low student-to-teacher ratio. These classes use standards-based curricula as well as some programs to develop appropriate behaviors.

Classes for autistic students require staff, teachers and aides trained in best practices and methods. Equipment may include furniture not typically found in special education classrooms.

#### *Support Services*

As stated above, medically fragile students and students with multiple disabilities may require additional nursing staff. The need for other support service staff such as speech therapists and psychologists is similar to other special education programs.



Community-based instruction classes usually require few additional support services. Most of these students no longer receive related services, and evaluations by the psychologist are usually brief.

Classes for emotionally disturbed students require support services from a psychologist or counselors to assist with behavior plans, classroom management, and small group and individual counseling. Other related services are similar to those in any special education class.

Classes for autistic students may require more related services than other special education classes, including speech therapy, behavioral intervention support and occupational therapy.

### *Training*

Site administrators, special educators and general education teachers will need various levels of professional development training depending on the classes and student needs at their site. Sites with medically fragile students or students with multiple disabilities usually need an overview of the disabilities in the class so that they are comfortable with those students. These students are sometimes mainstreamed to provide socialization.

If their class is held on a regular campus, community-based instruction students are often included in school activities and may work on the campus in some capacity. Site staff and administrators will need general training and information regarding disabilities.

Staff and administrators at sites with emotionally disturbed students with acting out behaviors will need training in behavioral techniques and strategies.

Staff and administrators at sites that serve autistic students will need additional training in this disability and the methods taught. They may also need training in the effective use of aides in the general education classroom because these students are often integrated into the general education program.

### *Costs*

FCMAT performed a cost comparison for two types of classes. The first is a comparison of a district-operated community-based instruction class with one operated by the county office. This program was considered because community-based instruction students throughout the state are commonly served in district-operated programs. The philosophy behind community-based instruction includes developing independent skills in the community where students reside. Staff are relatively easy to find, facilities and materials are less costly than other special education programs, and training is not difficult to provide. Further, the district is aware of seven additional students who will be referred to the county office-operated community-based instruction program for 2010-11 if there is no district-operated program for them by that time.

**Table 11: Comparison of district and county office costs to operate a community-based instruction class for 12 students.**

<b>Staffing</b>	<b>#FTE</b>	<b>Average Salary</b>	<b>Total Salary</b>
Teachers	1.0	\$70,224.00	\$70,224.00
Aides	2.0	38,010.00	76,020.00
Psychologist	0.1	95,362.00	9,562.00
<b>Total Staffing</b>			<b>\$155,806.00</b>
<b>Program Support Costs</b>			
Materials and Equipment			\$3,000.00
General Operating			17,882.72
<b>Total</b>			<b>\$20,882.72</b>
<b>Total Combined</b>			<b>\$176,688.72</b>
<b>Estimated Startup costs</b>			
Materials and Supplies			7,000.00
<b>Total startup costs</b>			<b>\$7,000.00</b>
<b>Total cost for program year one</b>			<b>\$183,688.72</b>
<b>Cost for 12 students in county office program</b>			<b>\$295,860.00</b>
<b>(cost per student: \$24,655.00)</b>			
<b>First year savings</b>			<b>\$112,171.28</b>

Data is based on average salaries in the district's current salary schedule; it does not include health and welfare benefit costs.

The data in Table 11 assumes the district will no longer have 12 of its students in the county office-operated community-based instruction program and does not include costs for any students remaining in that program. Salary costs are based on the average cost in each classification as of January 21, 2010. This calculation does not include the cost of student transportation or any costs in addition to the base cost that the district may be paying.

As with the NPS programs, numerous student attendance patterns could affect these numbers, including new referrals that result in more than 12 students in the community-based instruction program, less than 12 students in the program, continuing to have 26 students in the county office-operated program, or having no students in the county office-operated program.

The second comparison provided by FCMAT is between a district-operated class for emotionally disturbed students and the current county office-operated class for these students. There is currently one such county office-operated class held at a district-owned facility, and the March 2009 report by Patricia S. Crocker, Ed.D. also recommended that the district operate this class, stating the following:

The Antioch School District now has the space to create a greater variety of SDC programs to serve students who are now in county or non-public school placements. A current effective example would be the ED class at Dallas Middle School.

*Contra Costa Special Education SELPA Review*, by Patricia S. Crocker, Ed.D, March 2009

Seven of the district’s students are in the county office-operated class for emotionally disturbed students. These students are transitioning to this class from the county office’s Floyd I. Marchus School, and they are mainstreamed into district programs. District staff indicated that additional students in the district’s special education classes are being referred to a county office-operated program for emotionally disturbed students, and that there are district students already in such a program who could transfer to a new district class if that option were available.

Facility issues would be minimal because the class is already held at a district-owned facility and thus familiar to staff and students. Materials and equipment would focus on the core curriculum and therefore be easy to obtain. Additional psychologist and/or counselor support services would be needed, though additional psychologist time was not included in FCMAT’s cost comparison.

**Table 12: Comparison of district and county office costs to operate a class for 10 emotionally disturbed students.**

Staffing	#FTE	Average Salary	Total Salary
Teachers	1.0	\$70,224.00	\$70,224.00
Aides	2.0	38,010.00	76,020.00
Psychologist	0.4	95,362.00	38,155.80
<b>Total Staffing</b>			<b>\$184,399.80</b>
<b>Program Support Costs</b>			
Materials/Equipment			\$3,000.00
General Operating			19,927.28
<b>Total</b>			<b>\$22,927.28</b>
<b>Total Combined</b>			<b>\$207,327.08</b>

Estimated Startup costs			
Materials/Supplies			7,000.00
<b>Total startup costs</b>			<b>\$7,000.00</b>
<b>Total cost for program year one</b>			<b>\$214,327.08</b>
<b>Cost for 10 students in county office class</b>			<b>\$246,550.00</b>
<b>(cost per student: \$24,655.00)</b>			
<b>First year savings</b>			<b>\$32,222.92</b>

Data is based on average salaries in the district’s current salary schedule; it does not include health and welfare benefit costs.

Table 12 assumes that the district will no longer have 10 of its students in the county office-operated program and does not include costs for any students remaining in that program. Salary costs are based on the average cost in each classification as of January 21, 2010. This calculation does not include the cost of student transportation or any costs in addition to the base cost that the district may be paying.

As is the case with NPS programs and with the comparison of community-based instruction classes above, numerous student attendance patterns could affect the numbers in Table 12.

One additional and important consideration not included in any of the calculations is the ability of the special education staff at the district office to provide the additional support and monitoring that these new classes would require.

Achieving a successful transition of students and a defensible program will require programs that are at least comparable to those operated by the county office. County office staff have indicated that they will work with the district regarding what is needed to operate each of the programs.

**Recommendations**

*The district should:*

1. Carefully review the following when deciding whether to transfer programs or create new programs:
  - The ability to hire qualified teachers and aides, and the cost.
  - The ability to hire qualified support services staff, and the cost.
  - The availability of facilities and associated cost.
  - The expense of acquiring necessary materials and equipment.

- The cost of providing professional development.
  - The expense of additional special education district office staff if needed.
2. Follow these recommendations prior to transferring students from a county office-operated program or creating a district-operated program. :
    - a. Develop a short-term and long-term plan for opening classes.
    - b. Notify the SELPA and the county office of its intent.

Include in the SELPA time line its short-term and long-term plan and any recommended changes so that the SELPA, the county office and other districts are able to carry out their own short-term and long-term planning.
    - c. Develop training for school site staff and administrators in both general classroom management and how to manage more difficult student behaviors so the sites do not feel that these students need a more restrictive environment, resulting in referral to a county office-operated program.
    - d. For the short term, consider operating one community-based instruction class and one class for emotionally disturbed students beginning with the 2010-11 school year.
    - e. For the long term, consider opening additional community-based instruction classes, two to four additional classes for emotionally disturbed students and one elementary class for autistic students during the 2011-12 and 2012-13 school years.
    - f. When planning, consider students currently in county office-operated programs and new students who would be referred to such programs to ensure a decline in the total number of the district's students in county office-operated programs.
    - g. Review needs and provide additional community-based instruction classes, classes for emotionally disturbed students and classes for autistic students in 2013-14 as needed.
  3. After successful implementation of the classes listed above, consider developing programs for students with more severe disabilities and more intensive needs.

Develop a plan that takes into consideration all of the factors listed in the recommendations for short- and long-term planning when evaluating the ability to provide programs for the upper elementary and secondary classes and programs for autistic students, students with multiple handicaps and medically fragile students.
  4. Determine if cost savings and educational benefits would be realized as a result of moving students from a NPS to the newly formed county office-operated program for the 2010-11 school year.



# Appendices

## **Appendix A**

*Effective Indicators for Learning Centers*

## **Appendix B**

*Sample Guidelines for Special Circumstances Aides*

## **Appendix C**

*Study Agreement*





# **Appendix A**

## *Effective Indicators for Learning Centers*



**Los Angeles Unified School District  
Division of Special Education**

Learning Center

Description	A shared classroom or classrooms space where varied levels of intervention and support are provided by a diverse group of educators.
Purpose	<p>The purpose of the learning center is to :</p> <ul style="list-style-type: none"> <li>▪ Provide instructional support to students with disabilities.</li> <li>▪ Provide layers of intervention to students with disabilities and students at risk.</li> <li>▪ Provide a central location for instructional and supplemental resources to support student learning.</li> <li>▪ Provide a coordinated system for the provision of support services.</li> </ul>
Instructional Support	<p>Drop in center for immediate intervention. Example: students flow in and out to take tests, receive immediate intervention tied to the classroom, check in with a home base, etc.</p> <p>Specific instruction in educational strategies. Example: students are pretaught a learning strategy that will be used in content instruction, notetaking, organizational skills, etc. this could take place during advisory or homeroom.</p> <p>Social skill instruction. Example: Elective class: <i>Developing Reading Skills Across the Curriculum</i> Example; students participate in this class for an elective. They are taught targeted strategies for learning from content material. These may include the REWARDS program, designed to teach a strategy for decoding multi-syllabic words, <i>Makes Sense Strategies</i>, a program designed to support students learning of content material or Skills for School Success.</p>
Students served	<p>Students participating general education classes Any eligibilities Students served through both RS and SDP</p>
Staff	<p>General and special education teachers Coaches, and cadre leaders Paraprofessionals, special and general education DOTs personnel Counselors DIS providers</p>
Structure	<p>Aligned with small learning community structure Consolidates resources, puts all materials in one or two central places Provides range of services connected to content curriculum, development of accommodations, fluids supports, intensive supports</p>
Curriculum	<p>REWARDS Algebra Ready Skills for School Success Strategies Intervention Models Content Enhancement Strategies</p>

**Learning Center Effectiveness Indicators**

Identify all items observed.

<b>Assessment</b>			
Indicators	YES	NO	In place
1. Diagnostic assessments are in place to identify specific areas of weakness.			
2. Ongoing progress monitoring system is in place and used at least weekly.			
<b>Curriculum</b>			
1. Core curriculum is the foundation of instruction.			
2. Supplemental materials provided with the core curriculum are being used.			
3. Evidence-based intervention materials are used.			

<b>Instruction-<i>Standards-based</i> (60 – 70 % of instructional time)</b>			
Indicators	YES	NO	Comments
1. Learning strategies and/or advanced graphic organizers are explicitly taught through use of critical teaching behaviors, describe, model and practice.			If possible, Identify the strategy.
2. Preteaching or reteaching of content instruction is evident.			
3. Scaffolding of instruction and instructional tools is evident.			
4. Students are actively engaged in the lesson.			
5. Cooperative learning structure is used.			<input type="checkbox"/> Cooperative learning <input type="checkbox"/> Peer assisted learning <input type="checkbox"/> Small group structure <input type="checkbox"/> Other

<b>Instruction –<i>Intervention</i> (15 - 20% of instructional time)</b>			
1. Intervention is intentional (performance level) and targeted (short, to the point)			
2. Direct instruction in foundational skills is evident.			<input type="checkbox"/> Reading <input type="checkbox"/> Writing <input type="checkbox"/> Math

<b>Paraprofessionals</b>			
1. Paraprofessionals support individual or small groups of students.			

# **Appendix B**

## *Sample Guidelines for Special Circumstances Aides*



# Process for Requesting Special Circumstance Instructional Aides

## Guidelines and Forms

Revised 9/1/09

## **Guidelines for Requesting Special Circumstance Instructional Assistance**

Rationale: Special circumstance instructional assistance (SCIA) may be indicated in situations where additional staff support is needed in the classroom or en route to and from school due to 1) pervasive and aggressive student behaviors directed towards self or others, or 2) intensive student needs.

Factors for review and consideration:

The goal for any special needs student is to encourage, promote, and maximize independence. If not carefully monitored, special circumstance instructional assistance can easily and unintentionally foster dependence. A student's total educational program must be carefully evaluated to determine where support is indicated. Natural support and existing staff support should be used whenever possible to promote the least restrictive environment.

Special factors for students residing in the \_\_\_\_\_:

1. All requests for SCIA shall be submitted to the Director of Special Education. SCIA should not be indicated in individual student IEP's as a service. However, in certain circumstances the need for additional support may need to be indicated in a student's IEP. In those instances, the need shall be indicated in the present levels or meeting notes as "100% supervision."
2. For services requiring additional personnel support as a result of student-related behavioral issues, a positive behavioral support plan or Behavior Intervention Plan should be developed and should include provisions describing how and when the support will be utilized to implement the plan and when the plan will be reviewed and modified, including the fading of SCI Assistance.
3. Observational assessments and team staffings will be conducted on a quarterly basis to evaluate the continued need for SCIA.

Budget coding for additional paraeducator support (classroom and/or transportation):

0100-56400-0-5750-3142-220004-XXXX-XXX

0100-65000-0-5750-1110-210004-XXXX-XXX

The appropriate code must be entered on all status forms and payroll timesheets.

The Special Education Department Accountant shall receive a copy of all SCIA requests and shall be notified routinely of all excess costs.

Process for requesting SCI Assistance:

1. Complete the Request for Special Circumstance Instructional Assistance (for Classroom Support and/or Transportation Support).
2. Complete the Observational Evaluation for SCI Assistance (For Individual Student Support only).



3. Complete the Student Needs for Additional Support Rubric (For Classroom Support , Individual Student Support and Transportation Support).
4. Complete the Class Weighting Worksheet (For Classroom Support only).
5. Attach supporting documentation if pertinent (IEP, Behavior Plan, etc.).
6. Submit all paperwork to the Director of Special Education.
7. Upon approval, complete the Request for Long-term Substitute for classroom support and/or an employee status form for transportation support (regular employee ride along).
8. All forms will be disseminated to the Special Education Accountant, Human Resources Department, Program Specialist and Special Education Director.
9. The Special Education Director will assist the site during each quarter to review the need for on-going SCIA classroom and/or transportation support.

**Request for Special Circumstance Instructional Aide**

**Student-Related: Classroom Support or Individual Student**

Please complete all required information and return to the Special Education Department, Director of Special Education. Notification of approval will be provided to the Program Manager, Special Education Accountant, Finance Department, and Human Resources Department.

*Program* \_\_\_\_\_ *Teacher* \_\_\_\_\_

**Program Specialist** \_\_\_\_\_ **Date** \_\_\_\_\_

Complete 1 or 2:

1. Classroom Support \_\_\_\_\_ Class Location \_\_\_\_\_

2. **Individual Student Support** \_\_\_\_\_ **Name** \_\_\_\_\_

**District of Residence** \_\_\_\_\_ **DOB** \_\_\_\_\_

All requests for Special Circumstance Instructional Assistance are reviewed quarterly. Please attach required forms and supporting documentation (Refer to SCIA Guidelines).

*Requested Start Date* \_\_\_\_\_ *Anticipated Ending date* \_\_\_\_\_

Department Approval:

\_\_\_\_\_  
Program Specialist \_\_\_\_\_ Date \_\_\_\_\_

\_\_\_\_\_  
Special Education Director/Administrator \_\_\_\_\_ Date \_\_\_\_\_

**Comments:**

SCIA Assignment Codes:

0100-56400-0-5750-3142-220004-XXXX-XXX

0100-65000-0-5750-1110-210004-XXXX-XXX

**Enter budget code:**

FUND	RESOURCE	YEAR	GOAL	FUNCTION	OBJECT	DEPT.	MANAGER

**Request for Special Circumstance Instructional Aide  
Student-Related/Transportation Support**

Please complete all required information and return to the Special Education Department, Director of Special Education. Notification of approval will be provided to the Program Manager, Special Education Accountant, Finance Department, and Human Resources Department.

*Program* \_\_\_\_\_ *Teacher* \_\_\_\_\_

**Program Specialist** \_\_\_\_\_ **Date** \_\_\_\_\_

**Student** \_\_\_\_\_ **DOB** \_\_\_\_\_

**District of Residence** \_\_\_\_\_ **Classroom** \_\_\_\_\_

*Requested Start Date* \_\_\_\_\_ *Anticipated Ending date* \_\_\_\_\_

**Transportation Provider (check one):** \_\_\_\_\_ **District of Residence** \_\_\_\_\_ **First Student**

**Rationale for ride-along support:** (Attach additional information/documentation)

-----  
Department Approval:

\_\_\_\_\_  
Program Specialist

\_\_\_\_\_  
Date

\_\_\_\_\_  
Special Education Director

\_\_\_\_\_  
Date

**Comments:**

SCIA Assignment Codes:  
0100-56400-0-5750-3142-220004-XXXX-XXX  
0100-65000-0-5750-1110-210004-XXXX-XXX

Enter budget code:

FUND	RESOURCE	YEAR	GOAL	FUNCTION	OBJECT	DEPT.	MANAGER

## Special Education Class Weighting Worksheet

Program: \_\_\_\_\_ Teacher: \_\_\_\_\_ Site: \_\_\_\_\_

Contact phone: \_\_\_\_\_ Total Number of Students: \_\_\_\_\_ Total Number of Paraeducators: \_\_\_\_\_

	<i>Health/Personal Care</i>	<i>Behavior</i>	<i>Instruction</i>	<i>Inclusion/Mainstreaming</i>
	___ A. Specialized health plan ___ B. G-tube ___ C. Medications ___ D. Suctioning ___ E. Food preparation ___ F. Diaper changing ___ G. Feeding-full support ___ H. Seizures weekly ___ I. Other: _____	___ A. Behavior plan in place ___ B. Physically aggressive weekly ___ C. Non-compliant in class ___ D. Non-compliant on campus ___ E. Runs away weekly ___ F. ADHD medication ___ G. Mental health client ___ H. Other: _____	___ A. Discrete Trial/ABA ___ B. Physical prompts 80%+ ___ C. Verbal prompts 80%+ ___ D. Structured teaching ___ E. Assistive technology ___ F. PECS ___ G. Signing 80%+ ___ H. Other: _____	___ A. Direct adult instruction ___ B. Physical support/positioning ___ C. Safety supervision 80%+ ___ D. Close visual supervision 80%+ ___ E. Other: _____
<b>Student Names</b>				<b>Total</b>

**Rating System:**

1. Write the "letter" for each of the items that apply to students in the columns above.
2. Tally and enter the number of individual items for all students in the area provided next to the items at the top of the columns. Example: If five students have a "Specialized health plan" in place, mark a "5" on the line next to "A. Specialized health plan" in the first column.
3. Please provide data for each item marked.

Form to be completed by Program Specialist or Psychologist.

## Student Needs for Additional Support Rubric

Student Name: \_\_\_\_\_ DOB: \_\_\_\_\_ Disability: \_\_\_\_\_ Date Reviewed: \_\_\_\_\_

Teacher: \_\_\_\_\_ Current Program: \_\_\_\_\_

Select the number that best describes the student in each rubric category that is appropriate.

	<b>Health/Personal Care/Rating</b>	<b>Behavior/Rating</b>	<b>Instruction/Rating</b>	<b>Inclusion/Mainstreaming/Rating</b>
<b>0</b>	General good health. No specialized health care procedure, medications taken, or time for health care. Independently maintains all "age appropriate" personal care.	Follows adult directions without frequent prompts or close supervision. Handles change and redirection. Usually gets along with peers and adults. Seeks out friends.	Participates fully in whole class instruction. Stays on task during typical instruction activity. Follows direction with few to no additional prompts.	Participate in some core curriculum within general education class and requires few modifications. Can find classroom. Usually socializes well with peers.
<b>1</b>	Mild or occasional health concerns. Allergies or other chronic health conditions. No specialized health care procedure. Medications administration takes less than 10 minutes time. Needs reminders to complete "age appropriate" personal care activities.	Follows adult direction but occasionally requires additional encouragement and prompts. Occasional difficulty with peers or adults. Does not always seek out friends but plays if invited.	Participates in groups at instructional level but may require additional prompts, cues or reinforcement. Requires reminders to stay on task, follow directions and to remain engaged in learning.	Participates with modification and accommodation. Needs occasional reminders of room and schedule. Requires some additional support to finish work & be responsible. Needs some social cueing to interact with peers appropriately.
<b>2</b>	Chronic health issues, generic specialized health care procedure. Takes medication. Health care intervention for 10-15 min daily (diet, blood sugar, medication). Requires reminders and additional prompts or limited hands on assistance for washing hands, using bathroom, wiping mouth, shoes, buttons, zippers, etc. Occasional toileting accidents.	Has problems following directions and behaving appropriately. Can be managed adequately with a classroom behavior management plan, but unable to experience much success without behavior support plan implementation.	Cannot always participate in whole class instruction. Requires smaller groups and frequent verbal prompts, cues or reinforcement. On task about 50% of the time with support. Requires more verbal prompts to follow directions.	Participates with visual supervision and occasional verbal prompts. Requires visual shadowing to get to class. Needs modifications & accommodations to benefit from class activities. Regular socialization may require adult facilitation.
<b>3</b> *	Very specialized health care procedure and medication. Limited mobility. Physical limitations requiring assistance (stander, walker, gait trainer or wheelchair). Special food prep or feeding. Health related interventions 15-45 min. daily. Frequent physical prompts and direction assistance for personal care. Food prep required regularly. Requires toilet schedule, training, direct help diapering.	Serious behavior problems almost daily. Defiant and/or prone to physical aggression. Requires a Behavior Intervention Plan (BIP) and behavior goals and objectives on the IEP. Requires close visual supervision to implement BIP. Medication for ADD/ADHD or other behaviors.	Difficult to participate in a large group. Requires low student staff ratio, close adult proximity and prompts including physical assistance to stay on task. Primarily complies only with 1:1 directions & monitoring. Cognitive abilities & skills likely require modifications not typical for class as a whole. Needs Discrete Trial, ABA, Structured Teaching, PECS. Requires signing over 80% of time.	Participation may require additional staff for direct instructional and behavioral support. Requires direct supervision going to & from class. Always requires modifications & accommodations for class work. Requires adult to facilitate social interaction with peers.
<b>4</b> *	Specialized health care procedure requiring care by specially trained employee (G tube, tracheotomy, catheterization.) Takes medication, requires positioning or bracing multiple times daily. Health related interventions 45 min. daily. Direct assistance with most personal care. Requires two-person lift. Direct 1:1 assistance 45 or more minutes daily.	Serious behavior problems with potential for injury to self and others, runs-away, aggressive on a daily basis. Functional Analysis of Behavior or Hughes Bill has been completed and the student has a well-developed BIP, which must be implemented to allow the student to safely attend school. Staff has been trained in the management of assaultive behaviors.	Cannot participate in a group without constant 1:1 support. Requires constant verbal and physical prompting to stay on task and follow directions. Regularly requires specific 1:1 instructional strategies to benefit from the IEP. Cognitive abilities and skills require significant accommodation and modification not typical for the class group.	Always requires 1:1 staff in close proximity for direct instruction, safety, mobility or behavior monitoring. Requires 1:1 assistance to go to and from class 80% of the time. Requires adult to facilitate social interaction with peers and remain in close proximity at all times.

\*Attach a copy of documentation indicating frequency and duration over a period of time to determine further consideration of special circumstance instructional assistance. If mostly ratings of 3's & 4's, in two or more areas, continue with needs assessment process.

Observational Evaluation for SCI Assistance

**Student:** \_\_\_\_\_ **School:** \_\_\_\_\_

**Teacher:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Observer's Name/Title:** \_\_\_\_\_ **Setting:** \_\_\_\_\_

**Section I: Please complete the following review of the visual and physical structure of the classroom, curriculum design, data collection and planning.**

**Posted classroom schedule** \_\_\_\_\_ *Yes* \_\_\_\_\_ *No*

If yes, complete section below:

1. The following elements are included in the classroom schedule:

- |                                      |                                     |
|--------------------------------------|-------------------------------------|
| <input type="checkbox"/> Times       | <input type="checkbox"/> Locations  |
| <input type="checkbox"/> Students    | <input type="checkbox"/> Activities |
| <input type="checkbox"/> Staff names |                                     |

2. The schedule is  Daily  Weekly  Other \_\_\_\_\_

**Individual student schedule** \_\_\_\_\_ *Yes* \_\_\_\_\_ *No*

If yes, complete section below:

1. Student uses the following format for individualized schedule:

- |                                     |                               |
|-------------------------------------|-------------------------------|
| <input type="checkbox"/> Object     | <input type="checkbox"/> Icon |
| <input type="checkbox"/> Photograph | <input type="checkbox"/> Word |
| <input type="checkbox"/> Picture    |                               |

2. Room is arranged with structure to correlate with tasks on schedule:

- |   |  |
|---|--|
| <input type="checkbox"/> Area for one-to-one work | <input type="checkbox"/> Area for independent work |
| <input type="checkbox"/> Area for group work      | <input type="checkbox"/> Area for leisure          |
| <input type="checkbox"/> Not applicable           |  |

3. Student ability to follow the schedule:

- |  |  |
|--|--|
| <input type="checkbox"/> Independent                     | <input type="checkbox"/> With direct verbal prompt |
| <input type="checkbox"/> Non-verbal with gestural prompt | <input type="checkbox"/> With physical prompt      |
| <input type="checkbox"/> With indirect verbal prompt     |  |

Consistent  Inconsistent

4. Student use of the schedule:

- |   |   |
|---|---|
| <input type="checkbox"/> Student carries schedule       | <input type="checkbox"/> Student uses transition cards          |
| <input type="checkbox"/> Student goes to schedule board | <input type="checkbox"/> Teacher carries and shows the schedule |

Consistent  Inconsistent

**\*Attach sample classroom schedule and individual student schedule**

**Curriculum and instructional planning**

1. Check the curricular domains included in the student's program:

- |  |  |
|--|--|
| <input type="checkbox"/> Communication | <input type="checkbox"/> Academics             |
| <input type="checkbox"/> Self care     | <input type="checkbox"/> Motor skills/mobility |

- Domestic
- Social/behavioral
- Pre-vocational/vocational

- Recreation/leisure
- Other: \_\_\_\_\_

2. Describe curricular accommodations and/or modifications currently being used:

3. List equipment or devices used /available that may relate to the need for assistance (may be low incidence equipment or assistive technology device):

4. Are materials and activities age appropriate? \_\_\_\_\_ Yes \_\_\_\_\_ No

5. Are materials and activities instructionally appropriate? \_\_\_\_\_ Yes \_\_\_\_\_ No

***Current data systems and collection of data***

*Has data been collected on student performance?* \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, complete section below:

1. Current data on each objective includes:

- Date
- Task
- Level of independence (prompting needed)

2. Data is collected:

- Daily
- Weekly
- Biweekly
- Monthly

3. Data is summarized in the following manner:

- Graphed
- Written narrative
- Other \_\_\_\_\_

***\*Attach sample***

***Behavior and safety***

1. Describe the behavior management system in the classroom, including positive reinforcers and consequences. Is the system appropriate for the student or does it need modification?
  
2. Are specific positive behavior supports utilized for the student?  Yes  No  
Describe:
  
3. Is there appropriate safety equipment in place?  Yes  No
  
4. Are appropriate safety and medical procedures being used?  Yes  No
  
5. Does it appear appropriate training has been provided?  Yes  No

Comments:

6. Describe the student's interactions with peers:
  
  
  
  
  
  
  
  
  
  
7. Describe the student's interaction with non-classroom staff in a less structured environment:
  
  
  
  
  
  
  
  
  
  
8. What activities does the student choose during breaks?
  
  
  
  
  
  
  
  
  
  
9. What problems are evident?

***Planning team meetings***



1. Are team meetings held? (formal or informal meetings to problem solve) \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, complete section below:

- |  |                                   |
|--|-----------------------------------|
| <input type="checkbox"/> Daily               | <input type="checkbox"/> Biweekly |
| <input type="checkbox"/> Weekly              | <input type="checkbox"/> Monthly  |
| <input type="checkbox"/> Need to be schedule |                                   |

Meetings include the following participants:

***Current utilization of assistance***

How is existing assistance utilized?

- |  |   |
|--|---|
| <input type="checkbox"/> Behavior management                   | <input type="checkbox"/> Medical assistance |
| <input type="checkbox"/> Curriculum adaptation and preparation | <input type="checkbox"/> Supervision        |
| <input type="checkbox"/> Instruction - individual              |   |
| <input type="checkbox"/> Instruction - group                   | <input type="checkbox"/>                    |

Other \_\_\_\_\_

***Team Summary/Action Plan***

1. Can current conditions be modified to meet the student's goals and objectives and/or personal care needs? If so, how?
  
  2. What other types of assistance are needed? Why?
  
  3. Are there any other issues that need to be addressed?
  
  4. Recommendations:

## Techniques to Promote Independence and Fading of Support

1. Watch before assisting. Can the student ask for help from teacher or peer?
2. Can the student problem solve independently?
3. Give the student extra time to process and respond before assisting.
4. Provide consistent classroom schedule (posted, visual, at desk if needed, reinforcement periods included). Teach the student how to use it.
5. Start with the least intrusive prompts to get the student to respond:
  - A. Gestural, hand or facial signals
  - B. Timer
  - C. Verbal
  - D. Light physical
  - E. Hand over hand
6. Prompt, then back away to allow independent time.
7. Use strengths and weaknesses, likes and dislikes to motivate student participation and interest.
8. Model; guide (watch and assist); check (leave and check back).
9. Teach independence skills (raising hand, asking for help, modeling other students).
10. Praise for independent attempts.
11. Direct the student to answer to the teacher.
12. Prompt the student to listen to the teacher's instructions. Repeat only when necessary.
13. Encourage age appropriate work habits. See what other students are doing.
14. Be aware of proximity. Sit with the student only when necessary.
15. Encourage peer assistance and partnering. Teach peers how to help, not enable.
16. Utilize self-monitoring checklists for student.
17. Color code materials to assist with organization.
18. Use transition objects to help the student anticipate/complete transition (i.e., head phones for listening center).
19. Break big tasks into steps.
20. Use backward chaining (i.e., leave the last portion of a cutting task for the student, then gradually lengthen the task).
21. Assist in encouraging a means for independent communication (i.e., PECS).
22. Provide positive feedback (be specific to the situation).
23. Ask facilitative questions ("What comes next?" "What are other students doing?" "What does the schedule say?" "What did the teacher say?").
24. Give choices.

# **Appendix C**

## *Study Agreement*









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:

<i>Orientation:</i>	<i>to be determined</i>
<i>Staff Interviews:</i>	<i>to be determined</i>
<i>Exit Interviews:</i>	<i>to be determined</i>
<i>Preliminary Report Submitted:</i>	<i>to be determined</i>
<i>Final Report Submitted:</i>	<i>to be determined</i>
<i>Board Presentation:</i>	<i>to be determined</i>
<i>Follow-Up Support:</i>	<i>If requested</i>



7. CONTACT PERSON

Please print name of contact person: Denise Porterfield, CBO

Telephone: 925-776-2022 FAX: \_\_\_\_\_

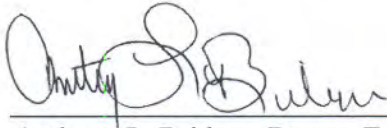
E-Mail: deniseporterfield@antioch.k12.ca.us



12-09-09

Don Gill, Ed D, Superintendent  
Antioch Unified School District

Date



November 17, 2009

Anthony L. Bridges, Deputy Executive Officer  
Fiscal Crisis and Management Assistance Team

Date

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