



**CSIS California School Information Services**

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May 11, 2012

Alicia Ahlswede, Board President  
Margaret Reece, Chief Business Officer  
Chico Country Day School  
102 West 11th St.  
Chico, CA 95928

Dear Board President Ahlswede and Chief Business Officer Reece:

The purpose of this management letter is to confirm the findings and recommendations developed by the Fiscal Crisis and Management Assistance Team (FCMAT) in a technical assistance study on special education regarding the Chico Country Day School. Fieldwork was conducted on site March 13-15, 2012.

Established in 1996, the Chico Country Day School is a charter school that serves approximately 515 students and has a special education enrollment of 39 students with specialized academic instruction provided through resource specialist services in both the traditional pull-out model and a learning center model. In January 2012, the charter school entered into an agreement for FCMAT to perform the following:

1. Review organizational chart and administrative structure for the charter including but not limited to special education department and make recommendations to improve efficiency and effectiveness.
2. Review referral process and make recommendations to assure legal compliance of timelines and placement are in effect.
3. Review staffing ratios of certificated and classified special education.
4. Review procedural manual policies and procedures to determine whether the charter is complying with legal requirements.

The study team was composed of the following members:

William P. Gillaspie, Ed.D. FCMAT Deputy Administrative Officer Sacramento, CA	JoAnn Murphy FCMAT Consultant Santee, CA
Leonel Martínez FCMAT Technical Writer Bakersfield, CA	Anne Stone FCMAT Consultant Mission Viejo, CA
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\*As a member of this study team, this consultant was not representing her employer but was working solely as an independent contractor for FCMAT.

**FCMAT**

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## Referral Process

A student study team (SST) is a school-based group that assists teachers in instruction, curriculum, classroom management, and behavior management. SSTs organize the resources available at a school into a system for identifying and solving the problems encountered when teaching children who do not progress at a satisfactory rate or demonstrate behavioral problems in the general education program.

Two code sections refer to general education responsibilities that must be met before a referral for a special education assessment. First, all referrals for special education assessment must include “Documentation of the resources of the regular education program that have been considered, modified and when appropriate, the results of intervention.” (5 CCR 3021 (b) (2)). Second, “A pupil shall be referred for special education instruction and services only after the resources of the regular education program have been considered and, when appropriate, utilized.” (30 EC 56303).

Chico Country Day School has an SST process in its charter petition that states “The purpose of the team will be to develop and implement an action plan that compliments and enhances the child while targeting the specific needs of the student.” The petition further states “For students who do not respond to Tier 2 strategies (implemented as part of the CCDS Response to Intervention program), a psycho-educational assessment may be requested by either parents or teachers to determine if a student has a learning disability.” Similar information is included in the charter school teacher’s handbook.

A flow chart of the Response to Intervention (RtI) process is outlined for the teachers. The school also has forms that teachers are required to complete before an SST; however, the steps required before a referral for special education are somewhat unclear. The Special Education Local Plan (SELPA) procedure manual includes a detailed section on special education referrals that would clarify the process for teachers and parents.

## Recommendations

*The charter school should:*

1. Review the referral process in the SELPA procedure manual and modify as needed for the charter school.
2. Provide the staff and parents with this information and incorporate it into the current charter school student study team process.

## Policies and Procedures

The Education Code requires special education regulations to be followed at all charter schools. (30 EC 56145) The SELPA has a complete and current special education procedural manual. Charter school special education staff members generally follow these guidelines, but they do not regularly use the manual to determine procedures. Staff members indicated that when questions arise regarding special education, the staff contacts the Butte County Special Education Department for assistance. This is certainly appropriate, but may not be necessary if the staff was familiar with and used the SELPA procedure manual.

The charter school recently completed the special education self-review (SESR) and initiated the required corrective actions. FCMAT reviewed the individual and Chico Country Day School charter out-of-compliance items. SESR requires all items to be addressed, and this entails reviewing individualized education program (IEP) files to ensure the item has been corrected. The charter school still needs to complete this portion of the self-review.

Some items were found out of compliance on more than one IEP, and staff members may need additional training in these items to ensure their ability to complete compliant IEPs. These include, but are not limited to the following:

1. Providing parents with the prior-written-notice document as appropriate. (Staff members indicated that this notice is utilized, but training in its use may still be required.)
2. Completing the required documentation of participation for state alternative tests and appropriate modifications.
3. Ensuring that all goals are measurable.
4. Providing documentation regarding the excusal of IEP members.
5. Ensuring that assessment plans include all required data from parent concerns.

Staff members indicated that charter school staff attendance at the SELPA coordinating council and governance council is sporadic. These meetings are the main vehicle for the school to be informed of any changes in special education regulations, solve problems with other SELPA districts/charter schools, implement new regulations, and provide support in dealing with situations that may lead to a state complaint or due process hearing. They also provide the SELPA with input on changes that could significantly affect the school such as the current discussions regarding the allocation model for the distribution of special education funds. While the charter school does not have a vote on the governance council, it is important to attend these meetings to gain knowledge and provide input.

Special education information is not consistently reported to the governing board. This includes developments on student numbers, contracted services, SESR items, and potential complaints or due process issues. These items are either not placed on the board agenda, or the board is informed only after the situation has been handled. The board cannot be responsible for decisions at an IEP team meeting, but should be regularly informed.

## Recommendations

*The charter school should:*

1. Ensure that all special education staff members have easy access to the special education procedural manual and are trained to use the contents.
2. Complete the SESR corrective actions and train the staff in all areas that were identified as systemic.
3. Ensure that the staff members directly responsible for special education attend SELPA operations committee meetings, and the principal/superintendent attends meetings of the SELPA governance council.
4. Ensure that the board is regularly informed of all special education issues such as caseloads, funding changes, and potential litigation.

## Staffing and Caseloads

At the Chico Country Day School, one full-time resource specialist (RSP) has a caseload of 18 special education students, and one intern teacher with a learning center program has a caseload of 10 students. Both programs continue to grow and are appropriately staffed within the statutory requirements that prohibit them from exceeding 28 students as stated in EC 56362 (6) (c).

The school employs a .5 full-time equivalent (FTE) speech therapist that has a caseload of 27 students, and the school is in the process of identifying additional students. To comply with statutory caseload requirements for speech and language specialists, the school must maintain a SELPA-wide average of 55 students for each full-time equivalent speech therapist.

The school employs a .5 FTE school psychologist who provides the charter with direct services and supports regionalized service providers designated by the school. The psychologist also has a role in the implementation of the district RtI model. Because of the range of roles and responsibilities, the part-time assignment is appropriate.

The school leadership is in transition, and during this interim period, a full-time director of special education was temporarily assigned. With a special education student enrollment of 39 students, the school should reconsider the necessity of a full-time director of special education. Greater efficiency could be achieved by combining these duties with another administrative position.

## Recommendations

*The charter school should:*

1. Closely monitor caseloads for RSP and learning center classes and consider combining caseloads if they do not reach capacity within the next two months.
2. Continue to monitor the speech therapist's caseload to ensure that it adheres to the statutory requirements.
3. Reevaluate the special education administrative staffing level and consider reducing the staff to maximize resources and maintain programmatic support through an administrative restructure.

## Organizational Structure

It is imperative for an organization's communication to be open and inclusive. The organizational chart provides a venue for a common understanding and communication. Separating duties between the top administrative officers decreases vulnerability and risk to the charter school and provides an opportunity to diffuse problems before they arise. Miscommunication between the staff and governing board can be minimized, and efficiency and accountability can be improved by using a system of checks and balances that designates an officer of the school as the single point of contact for the board on financial and personnel issues.

The chart below shows that the organizational structures in charter schools of comparable size are similar to that of the Chico Country Day School. However, these charter schools' flexibility in using vendors for business and human resources functions makes it difficult to compare the similar duties of those positions without a more extensive process:

### Administrative Structures in Other Charter Schools of Comparable Size

School	Chief Administrative Officer	Finance and Business	Other Administrative Duties		Enrollment
<b>Chico Country Day School</b>	1.0 FTE Principal	A FTE CBO	.5 Director of Special Education, 1.0 FTE Assistant Principal		515
<b>Redding School of The Arts</b>	Two full-time Administrators Each serve as .5 FTE Principal	Office Manager and Contracted Services	Curriculum and instruction, RTI, and Special Education duties are shared between Principals and Dean of Students.		496
<b>Edison Charter Academy</b>	1.0 FTE Superintendent / Principal Executive Director	1.0 FTE Finance Mgr./HR Director	1.0 FTE Programs Director/Assistant Academy Director	1.0 FTE Sp Ed Director/ RTI Director/ Testing Coordinator	521
<b>Bowman Academy Charter School of Morgan Hill</b>	1.0 FTE Superintendent/ Principal	1.0 FTE Business Manager	1.0 FTE Vice Principal, duties not specifically stated		518
<b>Charter School of Morgan Hill</b>	1.0 FTE Principal	1.0 FTE Business Administrator	Not Specified		525

Source: Phone interviews, school websites, Ed-Data website

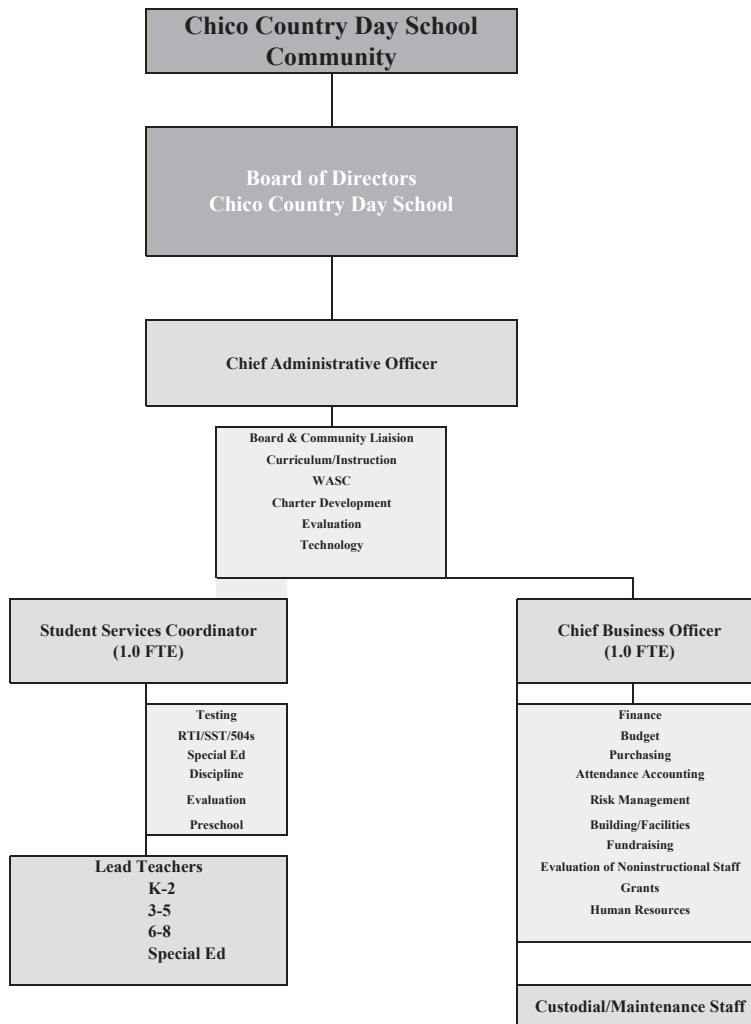
The Chico Country Day School’s charter, revised January 6, 2010, specifically names the job titles at the time the charter was approved. It may be necessary to develop an addendum or modify the document to reflect any job title changes that may occur as a result of the study.

The FCMAT study team conducted interviews with staff, administration and board members and found that there are concerns about the efficiency and effectiveness of the current administrative structure. Without program leadership, the chief business officer assumes responsibility for curriculum and educational program development, the school’s day to day operations, and tasks related to human resources, finance and budget. Although the school site staff provides some interim support while the school is trying to fill the vacancy, staff members agreed that a more effective structure is necessary to maintain the charter’s goals “to increase learning opportunities, using different and innovative teaching methods while achieving high standards of academic achievement” (CCDS Charter Petition, 2010).

Each of the comparable schools had a chief administrative officer reporting directly to the board who was responsible for all aspects of curriculum and programming for students. The Chico Country Day School should consider adopting a similar structure with the support of a student services coordinator. The coordinator would report to the chief administrative officer and provide direct support to statewide testing, RtI, special education, discipline, evaluation and the preschool. The chief administrative officer would assume full leadership responsibility to serve as the board and community liaison as well as tasks related to charter development, evaluation and technology.

The chief business officer would also report to the chief administrative officer and maintain primary responsibility for finance, budget, human resources, and custodial operations as well as a significant emphasis on building and facilities planning.

FCMAT has provided a sample organizational chart to assist the board in reviewing and analyzing the proposed changes to the administrative structure, which will increase the organization’s overall efficiency. The charter school should consider the following organizational chart as one option as well as any others that the board may feel appropriate in meeting the charter school’s needs.



FCMAT appreciates the opportunity to serve you and we extend our thanks to all the staff of the Chico Country Day School for their cooperation and assistance during this fieldwork.

Sincerely,

William P. Gillaspie, Ed.D.  
Deputy Administrative Officer