

FORMAT

Colusa County Office of Education

Special Education Review

January 9, 2007

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM



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Kern County
Superintendent of Schools

Chief Executive Officer
Joel D. Montero

FCMAT

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January 9, 2007

Kay Spurgeon, Superintendent
Colusa County Office of Education
146 7th Street
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Dear Superintendent Spurgeon,

In July 2006, the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement with the Colusa County Office of Education for a study of its special education programs. Specifically, the agreement asked FCMAT to:

1. Conduct a review of the Special Education program staffing ratios.
2. Determine whether the Special Education budget is efficient and if the COE Special Education per pupil costs are excessive in relation to the State average. Provide recommendations to improve fiscal efficiency, as necessary.
3. Review the Special Education referral process and determine whether over identification is taking place. If so, provide recommendations for improving existing processes and additional or alternative procedures that may reduce over identification.
4. Review the role and responsibilities of site administrators in providing special education leadership, and provide recommendations for improvements as necessary.
5. Review the overall effectiveness and efficiency of the special education delivery system and provide recommendations for cost savings without violation of student rights.

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

We appreciate the opportunity to serve you and we extend our thanks to all the staff of Colusa County Office of Education.

Sincerely,

Joel Montero
Chief Executive Officer

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Foreword

FCMAT Background

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

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

Since 1992, FCMAT has been engaged to perform more than 500 reviews for local educational agencies, including school districts and county offices of education. Services range from fiscal crisis intervention to management review and assistance. FCMAT also provides professional development training. The Kern County Superintendent of Schools is the administrative agent for FCMAT. The agency is guided under the leadership of Joel D. Montero, Chief Executive Officer, with funding derived through appropriations in the state budget and a modest fee schedule for charges to requesting agencies.

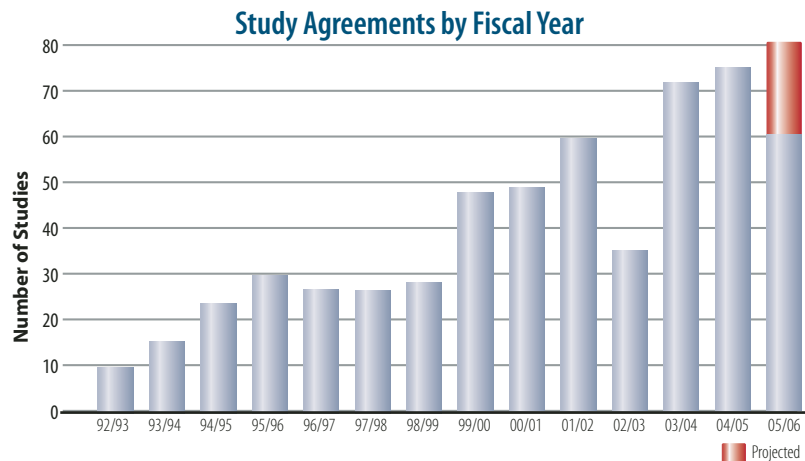
Total Number of Studies 562

Total Number of Districts in CA..... 982

Management Assistance.....	513	(91.28%)
Fiscal Crisis/Emergency	42	(7.47%)
Emergency Loan.....	7	(1.25%)

Note: Some districts had multiple studies

(Rev. 4/7/06)



Introduction

Background

The Colusa County Office of Education is located in the city of Colusa on the Sacramento river in northern California and serves approximately 4,500 students in four school districts. County Office special education programs serve approximately 575 students.

Study Team

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Study Guidelines

A FCMAT study team visited the district on July 18 and 19, 2006 to conduct interviews, collect data and review documents. The team continued to conduct research and review documents following the on-site visit. This report is a result of those activities and is divided into the following sections:

- I. Executive Summary
- II. Staffing
- III. Special Education Budget and Per-pupil Costs
- IV. Over-identification
- V. Leadership and Governance
- VI. Special Education Delivery Systems

Executive Summary

The Colusa County SELPA has developed innovative programs and services that it describes as “blending” and “push in”. This is an effective and efficient special education delivery system. Blending pupils with disabilities ranging from mild to severe in a single service setting allows the flexibility to meet all the pupils’ needs without multiple settings. Combined services require personnel with multiple credentials, qualifications and experience, which may have a fiscal impact on the SELPA. The “push in” model provides special education services within the regular classroom. These programs minimize the isolation of pupils with disabilities from the regular school population by providing equal opportunities for special education staff and students to be a part of the school site.

The Colusa County Office of Education provides all special education services and acts as the responsible local agency (RLA), receiving all direct SELPA regional services and program specialist revenues. The county office’s expenditures for special education programs and services exceed the state, federal and local tax revenues; however, the SELPA’s excess cost per pupil is between 13% and 16%, which is significantly less than the statewide average range of 20-30%.

The SELPA’s vision and mission statements may not be up to date and may not reflect the current intent and goals of the SELPA. These statements should be reviewed.

Personnel at some district and school sites have the misperception that students in county office special education programs are not the responsibility of the individual school districts. Every school district in California is responsible to serve all students, including all special education students. The county office and the SELPA should encourage and implement collaborative efforts that engage district and site staff and administrators in special education. As middle managers, principals can be particularly effective change agents; however they must be given authority, responsibility and accountability for their roles in special education. School districts in Colusa County need to discuss this issue in detail and have a clear understanding of the role of administrators at all school sites, including high schools.

The governance committees within the SELPA need to review, discuss and define special education leadership roles and responsibilities. District superintendents and the county superintendent must take a collaborative role in the operation of special education programs in order to be effective educational leaders.

The Colusa County Superintendent of Schools is the employer for all county office special education personnel. The local plan does not clearly describe or distinguish the separate roles of the SELPA and the county. The plan should be reviewed and these distinct roles defined.

Special education transportation services are efficient, but policies and procedures and the parent handbook should be clarified. Driver training and regular inspection of vans should also be addressed.

Some preschool special education students are served in Head Start programs. One preschool special education student is currently being served in a Special Day Class designed for medically fragile students at a primary school site. Should Head Start and private schools have no available space, alternative centers and services will be considered for new preschool special education students. This situation presents a compliance issue which should be resolved at the executive committee level.

Findings and Recommendations

Staffing

Administration

State guidelines recommend a service area with a total pupil enrollment of approximately 15,000 as the optimal size which a Special Education Local Plan Area (SELPA) may serve with regional programs, services and finances. The Colusa SELPA is comprised of the Colusa County Office of Education that serves as the responsible local agency (RLA) and the administrative agent, administering the SELPA for four school districts within Colusa County.

The SELPA member districts have a combined total 2005 CBEDS enrollment of 4,461 and a special education pupil count of 576, or 12.9% of the total pupil population. This includes one infant, 36 preschoolers, and 539 pupils in kindergarten through age 22.

The Colusa Local Plan combines SELPA and district program and service responsibilities. The local plan details the executive committee's responsibilities for providing procedures, and for hiring employees. However, it does not appear that the executive committee consistently carries out this responsibility.

The Colusa County Office of Education's assistant superintendent of special education programs is also the SELPA director, which contributes to the perception that the SELPA regional services and the county office special programs and services are a single entity. The assistant superintendent of special education is responsible for evaluating classified administrative staff and all special education certificated personnel.

Training and evaluation is divided between the special education administrator and the instructional support technician position for classified personnel, who provide assistance with classified in-service training and evaluations. The support technician position is split between special education and pupil transportation, working 0.50 full time equivalent (FTE) in each area.

The agreement between the county office and the Colusa County Educational Support Personnel (CCESP) through June 30, 2004 is ambiguous regarding the evaluation of instructional assistants. On page 22, the agreement states, "The evaluation process shall include the following: input (comments, suggestions) from the teacher and principal if applicable." The phrase "shall include" means that input will be included, yet the phrase "if applicable" appears to mean that the input may not be included in at least some instances.

The position of program specialist is vacant, although it has been advertised numerous times. There appears to be little direct regional support of programs and services, which are spread across four districts. The Colusa SELPA has received an apportionment of

\$61,099.35 in AB 602 state special education funding for this position to provide regional services. The Assistant Superintendent and office support personnel currently provide these services. The current local plan describes the program specialist position as “providing program support to teachers, students and families.”

The duties of program specialists are listed in California Education Code (E.C.) Section 56368 and include the following:

- Observe, consult with, and assist resource specialists, designated instruction and services instructors, and special class teachers.
- Plan programs, coordinate curricular resources, and evaluate effectiveness of programs for individuals with exceptional needs.
- Participate in each school’s staff development, program development, and innovation of special methods and approaches.
- Provide coordination, consultation and program development primarily in one specialized area or areas of his or her expertise.
- Be responsible for ensuring that pupils have full educational opportunity regardless of the district of residence.

The program support technician provides support services, including SELPA reports and program budget monitoring.

The office assistant provides clerical services to the SELPA and special education program.

Table 1: Colusa SELPA/Special Education Program Administration

Assistant Superintendent/SELPA Director	0.90
Program Specialist *	0.50
Program Support Technician	.99
Instructional Support Technician	0.50
Office Assistant II	1.00
Total:	3.89

* vacant position

Table 2: Comparison of County Offices of Education, Special Education Pupil- to-Administrator Ratios

Dec 2005 Pupil Count		Administrative Ratio	
County Office	Count, 0-22 Years	County Office	Ratio, 0-22 Years
Stanislaus	1,188	Mariposa	0.0714
El Dorado	1,069	San Luis Obispo	0.0306
San Joaquin	693	Imperial	0.0275
Colusa	576	Ventura	0.0244
Ventura	515	San Joaquin	0.0226
San Luis Obispo	496	Stanislaus	0.0160
Imperial	475	Glenn	0.0158
Glenn	406	Humboldt	0.0106
Humboldt	357	Napa	0.0087
Napa	320	El Dorado	0.0083
Mariposa	28	Colusa*	0.0069

*Combines SELPA Director/Assistant Superintendent for Special Education, and Program Director

Table 2 shows that Colusa county ranks fourth of 11 comparable counties in pupil count and 11th of 11 counties in administrative ratio.

Special education program implementation and supervision are not consistent, due primarily to an insufficient number of administrative personnel and a lack of participation on the part of site and district administrators. The program specialist position vacancy also adversely affects the delivery of programs and services.

Certificated staff do not currently participate in the process of evaluating special education paraeducators.

Recommendations

The SELPA and county office should:

1. Consider increasing the SELPA executive committee's participation in the development and implementation of special education programs and services.
2. Clearly define the roles and responsibilities of the SELPA director and the assistant superintendent of special education with regard to the special education programs and services and the regional services for the SELPA. Identify distinct and separate allocations of funding for each.
3. Clearly define the role and responsibilities of the program support technician, and the work time to be allocated to special education programs and services, and to regional services for the SELPA.

4. Consider filling the vacant program specialist position for which an appropriation of funding was received, and basing the FTE for this position on the funds available for staffing SELPA regional services.

The SELPA director should review the issues and concerns regarding the program specialist position and make a recommendation to the executive committee regarding the position. The director and the committee should consider making this a certificated position rather than an administrative position.

5. Negotiate for certificated staff participation in the evaluation of paraeducators.
6. Review the current county office certificated program administration to ensure that it provides for adequate supervision and evaluation of county office special education staff at district sites.

Instructional Programs and Services Staffing

Service Model

The Americans with Disabilities Act (PL 94-192, 1975) requires that pupils with disabilities be provided a free and appropriate education (FAPE) in the least restrictive environment (LRE) that is practicable.

Special education revenues, federal revenues excepted, are based on a district's average daily attendance (ADA). This funding model has the flexibility to allow for innovative programs and services in the least restrictive environment: the local school site.

The Colusa County SELPA has implemented FAPE and LRE by serving pupils with various disabilities under the supervision of qualified and experienced certificated staff in each pupil's school of residence. The only exception is a special day class for pupils with multiple disabilities, which is centrally located in the Colusa Unified School District and serves a small number of students with intensive needs.

The SELPA has innovative programs and services that it describes as "blending" and "push in." The blending of pupils with disabilities ranging from mild to severe in a single service setting allows the flexibility to meet all the pupils' needs without multiple settings. A small school can serve their pupils at the school site rather than transport pupils with severe disabilities to a special day class elsewhere. The "push in" model provides special education services within the regular classroom. Both of these programs minimize the isolation of pupils with disabilities from the regular school population.

Although effective, most of the SELPA's service model does not align with the traditional service setting categories of resource specialist programs, special day class non-severe and special day class severe. Thus a direct comparison of staffing ratios in most areas is not possible; comparison of the two different models will result in some exceptions.

The SELPA's designated instruction and services (DIS) follows the traditional model of itinerant unduplicated and duplicated related services to pupils, making a direct staffing comparison possible. Itinerant services are provided in the DIS model, including speech, adaptive physical education, vision services, occupational therapy, physical therapy and work-ability services.

Instructional Staffing

The SELPA has been able to attract and retain highly qualified and experienced instructional and support staff. Because many staff hold multiple credentials, the SELPA can combine students with a wide range of disabilities in the same location.

Table 3: Colusa COE Instructional Certificated Credential Status*

Number of Staff	Full Credentials	Less than Full Credentials*
36	30	6
Percent	83.33%	16.67%

*The data for this table was collected during the summer of 2006. Because new staff members have been hired since data collection, it may not reflect current staffing information.

The county's 36 certificated staff hold a total of 74 credentials covering 79 curriculum areas. The following data details the credential status of certificated staff in various areas:

Certificated Instructors:	22.50 FTE	100.00%
Full Credentials:	17.70 FTE	78.66%
Intern/Provisional/Emergency:	6.00 FTE	26.66%
Certificated Speech Language and Hearing	6.40 FTE	100.00%
Full Credentials:	6.40 FTE	100.00%
Itinerant Services	3.00 FTE	100.00%
Adaptive Physical Education	1.00 FTE	100.00%
Classified Itinerant Services		
Occupational Therapy	1.00 FTE	100.00%
Work Ability Coordinator	1.00 FTE	100.00%

Table 4: Certificated and Support/Classified Staff Assignments, Numbers of staff and FTE*

Assignment	Number of staff	FTE
School Site	23	22.50
Adaptive Physical Education	1	1.00
Occupational Therapist	1	1.00
Visually Impaired Instruction	1	0.20
Speech/Language/Hearing	7	6.40
School Psychologist	4	3.80
School Nurse	2	0.70
Total	39	35.60

*The data for this table was collected during the summer of 2006. Because new staff members have been hired since data collection, it may not reflect current staffing information.

The title of Resource Specialist is not used, though instructional personnel with various credentials may also have a resource specialist program (RSP) credential.

Recommendations

The SELPA should:

1. Continue to combine pupils with various disabilities in a single setting at their school of residence. This will serve students in the least restrictive environment as well as reduce transportation costs.
2. Continue to hire and retain qualified and experienced certificated staff.

Caseloads

Table 5: Recommended Pupil Caseload and Staffing Patterns by Service Setting

Traditional Pupil Caseload and /Staffing		Staffing	
Setting:	Caseload	Certificated	Classified
SDC Non-SH	10	1.00	1.00
SDC SH	10	1.00	2.00
RSP	28	1.00	0.80
DIS	10-55	1.00	0.00

The state has set arbitrary percentage guidelines for funding special education programs and services at 10% of a district's enrollment. Making up that 10% are recommended percentages for various service settings, based on the tenets of LRE.

- Special Day Class: 1.8%
- Resources Specialist Program: 4.0%
- Designated Instruction and Services: 4.2%

Also making up that 10% are the following percentage guidelines for severe and non-severe disabilities:

- Special Day Class, Nonsevere Handicapped: 1.45%
- Special Day Class, Severely Handicapped: 0.35%
- Resource Specialist Program (RSP): 4.00%
- Designated Instruction and Service (DIS): 4.20%

At a workshop in 2005, School Services of California (SSC) presented a survey of staffing ratios in districts and counties. The results are shown in Tables 6, 7 and 8.

Table 6: SSC Severe SDC Caseload Guidelines

Severe SDC Caseload Guidelines			
Disability	Typical Caseloads		
	Pupils	Certificated	Classified
Autism	8	1	2
Hearing Impaired	8-10	1	2
Multi-Handicapped	8-10	1	2
Orthopedically Impaired	8	1	2-3
Emotionally Disturbed	8-10	1	2
Developmentally Delayed	10-12	1	2

Table 7: SSC Non-Severe Caseload Guidelines

Non-Severe SDC Caseload Guidelines			
Setting	Typical Caseloads		
	Pupils	Certificated	Classified
Preschool	10-12	1	1-2
K-8	12	1	1
9-12	12-15	1	1

Table 8: SSC DIS Caseload Guidelines

DIS Caseload Guidelines		
Service	Pupils	Certificated or Licensed
Adaptive PE	45-55	1
D & HOH Itinerant	20-30	1
Individual and Small Group Instruction	20-28	1
OT Assistant Services	20	1
Occupational Therapy	10-15	1
Physical Therapy	25-30	1
Social Worker	20-30	1
Speech & Language: Preschool	40 max	1
Speech & Language: K-12	55 avg	1
Visually Handicapped Itinerant	10-30	1
Vocational Education	40-75	1

The SSC survey data indicates that non-severe caseloads are increasing and that severe programs and services require more personnel and smaller caseloads. The SSC workshop emphasized the importance of creating and implementing a formal special circumstance assistance policy and procedures to control costs by providing criteria for the assignment of one-to-one aides.

The SELPA's "push-in" model, which places some special education students in regular classrooms with assistance from special education instructors and assistants, may result in increased costs for one-to-one assistants within the regular classroom.

Traditional Caseload Requirements

Caseload is understood to be all students served by a certificated, and sometimes classified, personnel. This is the unduplicated and duplicated count of pupils served by the personnel.

The special day class (SDC) is for pupils with intensive disabilities that cannot be served in a less restrictive environment at the school site. The SDC can be further delineated as non-severe and severe. There is no statutory caseload requirement.

The resource specialist program (RSP) is for pupils with less intensive needs who can be served within the regular school program with some pull-out service for specific needs. The statutory requirement for caseload is 24 to 28 [E.C. 56362 (c)], but can be exceeded with a waiver.

Designated Instruction and Service

The designated instruction and services (DIS) can cover a wide range of situations and disabilities to serve students with specific disabilities and needs, including speech, language and hearing. The single statutory requirement for speech, language and hearing services specifies an average caseload of 55 for most pupils (E.C. 56363.3), though this may be higher under specific SELPA guidelines. A caseload of 40 is specified for pupils 3 to 5 years old (E.C. 5644.7). These caseloads may not be augmented with the use of speech aides.

Direct Instruction Caseloads

Caseload data shows a high incidence of duplicated pupil counts (See Table 9) indicating that many pupils are served by more than one special education instructor or service. The data also makes it impossible to separate pupils into SDC or RSP configurations.

Colusa COE Caseload Data for Direct Instruction

Table 9: Colusa COE Staffing Caseload Ratio (August 14, 2006)

School Site	FTE	Classified FTE	Total FTE	Unduplicated Count	Duplicated Count	Caseload	Pupil/Certificated Ratio	Pupil/Staff Ratio
Egling	1.00	3.25	4.25	6	10	16	16	3.76
Infant/Pre	1.00	1.46	2.46	0	17	17	17	6.91
MH Class	1.00	1.83	2.83	0	6	6	6	2.12
BPS	1.00	2.33	3.33	5	11	16	16	4.80
AES	1.00	1.79	2.79	15	3	18	18	6.45
JJH	1.00	1.75	2.75	10	11	21	21	7.64
CHS/GI/JJH	1.00	1.33	2.33	15	3	18	18	7.73
ATP	1.00	3.35	4.35	4	3	7	7	1.61
WMS	1.00	0.67	1.67	22	8	30	30	17.96
MHS	1.00	0.88	1.88	15	1	16	16	8.51
PHS	1.00	1.00	2.00	21	2	23	23	11.50
EMS	1.00	0.00	1.00	8	10	18	18	18.00
WES	1.00	0.92	1.92	9	11	20	20	10.42
AES	1.00	2.63	3.63	1	13	14	14	3.86
PHS	1.00	0.88	1.88	20	2	22	22	11.70
WHS	1.00	0.88	1.88	25	0	25	25	13.30
MES	1.00	3.46	4.46	13	13	26	26	5.83
JJH	1.00	1.46	2.46	23	5	28	28	11.38
WJHS	1.00	0.82	1.82	15	6	21	21	11.54
WUSD Itin	1.00	1.79	2.79	2	6	8	8	2.87
CHS/COM SC	1.00	1.08	2.08	16	5	21	21	10.10
EMS	1.00	0.88	1.88	8	10	18	18	9.57
MES	0.50	0.00	0.50	0	0	0	0	0.00
Totals:	22.50	34.44	56.94	253	156	409	18	7.18

The data in Table 9 is current as of August 14, 2006. Caseloads may change as new staff or hired or as enrollment increases in 2006-07. It is not possible to divide the services in Table 9 into the categories of RSP, SH SDC and Non-SH SDC.

The following inferences can be made from the above data:

- The high incidence of duplicated pupil count makes it impossible to separate pupil counts into SDC or RSP configurations. In addition, it indicates that many pupils are served by more than one special education instructor or service.
- A low pupil-to-staff ratio indicates a population with more intensive needs and/or the use of instructional assistants.
- A high pupil-to-staff ratio indicates a population with less intensive needs.

Designated Instruction and Services

Because the SELPA's designated instruction and services (DIS) are comparable with the SSC guidelines, the staffing ratios for this category could be compared directly.

Table 10 compares the county's caseloads with the SSC caseload guidelines, prorated for the county's pupil count.

Table 10: DIS Comparative Data: COE/SSC Guidelines (Itinerant)

Colusa County Service	County Pupil Count	SSC Guideline FTE	Colusa County Staffing FTE	FTE Amount Above/Below Guideline
Adaptive PE	37	0.82	1.00	0.18
Occupational Therapy	43	2.87	1.00	-1.87
Speech & Language: K-12	356	6.47	6.40	-0.07
Visually Handicapped Itinerant	6	0.60	1.00	0.40
Totals:	442	10.76	9.40	-1.36

When interpreting the DIS comparative data, one should take into account the fact that it is the beginning of the school year and that caseloads for DIS services can change frequently. In addition, qualified personnel can be difficult to recruit, retain and/or train. This can lead to the hiring of full time employees to retain needed services, even for caseloads that are below guidelines. It can also lead to full time employees carrying caseloads higher than guidelines due to a lack of qualified staff.

While the data show that the adaptive physical education caseload is appropriate, the occupational therapist has a heavy caseload that will likely increase throughout the school year, and the caseload for speech, language and hearing services is at the statutory maximum average of 55. The visually handicapped itinerant caseload remains low, even though it has increased from one pupil in 2003-04 to six pupils currently.

Additional DIS-related services not shown in Table 5 include 3.80 FTE school psychologists to provide DIS counseling services to 22 pupils and 0.7 FTE school nurses to provide specialized physical health care services to 20 pupils.

Programs delineated as RSP are restricted to a maximum of 28 pupils [E.C. 56362 (c)]. One "blended" service provider has a caseload of 30 pupils.

Recommendations

The county office and the SELPA should:

1. Develop a database that will provide for future comparisons of staffing ratios for the blended and push-in strategies used in the SELPA.
2. Monitor the caseloads of speech, language and hearing specialists to ensure compliance with statutory caseload requirements.
3. Develop and implement policies and procedures for assigning one-to-one assistants. The procedures should document need, define goals, specify duration and provide for periodic monitoring.

Support Services Staffing

Assembly Bill 722 *Study of Pupil Personnel Ratios, Services, and Programs*, California Department of Education (July 2003), lists the following support service staffing ratios as necessary for school districts to maintain adequate pupil support and programs:

Table 11: Adequate Ratios by Type of District

Pupil Support Personnel	Type of District		
	Elementary	Unified	High School
School Counselors	793/1	498/1	395/1
School Psychologists	1,138/1	1,269/1	1,651/1
Social Workers	3,452/1	4,555/1	2,617/1
School Nurses	1,548/1	1,194/1	2,189/1

The unified school district data for nurses and psychologists is used for comparison with services the Colusa county office provides to four districts as a unified service area. The school nursing services are modified by the fact that the Colusa Unified School District provides its own health services.

School Psychologists

Table 12: 2005 CBEDS Count for School Psychologist Comparison

Colusa COE	99
Colusa Unified	1,428
Maxwell Unified	442
Pierce Joint Unified	1,289
Williams Unified	1,203
Totals:	4,461

The county office's school psychologists, which number 3.80 FTEs, provide counseling and assessment services for all SELPA districts. Psychologists also provide support for county office special education staff at sites, chair and/or participate in student study teams (SSTs), and chair IEP meetings when assessments have not been performed.

The county's ratio of pupils to school psychologists is 1,173 to 1.

School Nurses

Table 13: October 2005 CBEDS Count for School Nurse Comparison

Maxwell Unified	442
Pierce Joint Unified	1,289
Williams Unified	1,203
Total	2,934

The county office has 0.70 FTE nurses serving regular education students in three of the four SELPA districts (Colusa Unified School District provides its own nursing services). An additional 0.90 FTE nurses serve the specific needs of special education students in all four districts. The pupil-to-nurse ratio for regular education is 4,191 to 1.0 FTE. The pupil-to-nurse ratio for special education is 640 to 1.0 FTE. The ratio listed as adequate by the CDE is 1,194 to 1.0 FTE.

Nurses provide mandated health screenings of regular and special education students, as well as specialized health care services for all special education students and mandated in-service training for staff. However, specialized health care services are not consistently monitored, and in-service training is not provided consistently.

Recommendations

The SELPA and county office should:

1. Review the duties and responsibilities of school psychologists and nurses to determine if there is a need for additional staff or changes in assigned duties to improve services.
2. Consider reducing psychologist's duties outside of counseling and assessment to enable psychologists to meet assessment deadlines.
3. Review the duties and responsibilities of school nurses in the areas of mandated screenings, basic and mandated in-service training, and specialized health care procedures. Ensure that screenings are properly implemented, staff are adequately trained and procedures are sufficiently monitored.

Special Education Budget and Per-Pupil Costs

Cost Per Pupil

The following information is required to determine the average cost per special education pupil.

- Total revenue resources, including the maintenance of effort report.
- The cost of salaries, benefits, materials, facilities, equipment and indirect support, including costs for administrative, instructional and support personnel.
- Unduplicated and duplicated pupil counts by disability.
- The primary and related services provided to each disability category. Currently, costs can be tracked to severe and non-severe categories. Primary services include the placement of the pupil with an instructor responsible for the IEP. Related services include speech, adaptive physical education, occupational therapy, transportation and others.
- Budget resources allocated to each disability category, including the percentage of each member serving each student, such as speech personnel assigned to autistic program and caseload.

This information provides a total cost for each disability category, which can then be divided by the number of pupils in that disability category to determine the average cost per pupil.

Another method is to use the broader categories of non-severe and severe to determine the average per pupil cost of services to students in each of these categories.

The total cost for all disabilities served by the agency divided by the total district special education pupil count gives the average cost per pupil in that agency.

The Colusa County Office of Education provides all special education services and acts as the responsible local agency (RLA), receiving all SELPA regional services and program specialist revenues. The county office's expenditures for special education programs and services exceed the state, federal and local tax revenues.

The local contribution of funding for special education is a federal requirement and is documented annually in the SELPA Maintenance of Effort (MOE) reports, which also contain data on federal, state and local tax revenues for special education. However, the state does not currently compile the MOE reports for the SELPA, the county office or the districts in Colusa County.

The MOE data does not account for the type and extent of programs operated by various educational entities. Some studies and reports have provided average costs per disability, but these do not provide sufficient data to enable valid comparisons.

SELPA and County Office Information

Colusa SELPA is a single-SELPA county serving four school districts. The county office acts as the administrative unit and the RLA, receiving revenues and administering SELPA regional services and program specialist services. The county office provides all special education programs and services to all four districts, including psychologist services. The county office also provides school nurse services to three of the four districts and the special education programs.

The county office does not generate an unrestricted general fund in the same manner as districts and thus cannot absorb excess costs, so these become the responsibility of participating districts. The excess costs become the districts' general fund contributions and are documented in the MOE report.

Table 14 shows the excess cost percentages and amounts for 2002-03, 2003-04 and 2004-05. Closing fiscal data for 2005-06 was not available.

Table 14: Excess Cost Percentage, Fiscal Years 2002-03, 2003-04 and 2004-05

Year	Revenue	Expenditures	Carryover	Excess Cost	Excess Cost %
2002/2003	\$3,168,505	\$3,616,901	\$0	-\$448,396	14.15%
2003/2004	\$3,334,029	\$3,884,633	\$0	-\$550,604	16.51%
2004/2005	\$3,575,640	\$4,199,680	\$0	-\$624,040	17.45%

Table 15: Total Cost per Pupil, Fiscal Years 2002-03, 2003-04 and 2004-05

Year	Revenue	Unduplicated Pupil Count	Revenue Per Count	Excess Cost Per Pupil	Cost per Unduplicated Count
2002/2003	\$3,168,505	541	\$5,857	\$829	\$6,686
2003/2004	\$3,334,029	582	\$5,729	\$946	\$6,675
2004/2005	\$3,575,640	566	\$6,317	\$1,103	\$7,420

Table 16: Excess Cost per Unduplicated Count, Fiscal Years 2002-03, 2003-04 and 2004-05

Year	Revenue	Expenditures	Carryover	Deficit/ Excess Cost	Unduplicated Pupil Count	Excess Cost Per Pupil
2002/2003	\$3,168,505	\$3,616,901	\$0	-\$448,396	541	\$829
2003/2004	\$3,334,029	\$3,884,633	\$0	-\$550,604	582	\$946
2004/2005	\$3,575,640	\$4,199,680	\$0	-\$624,040	566	\$1,103

The SELPA's excess costs are currently calculated by adding the SELPA regional services and program specialist revenue, and all district special education ADA revenue. This total becomes the county office's SELPA and program operational revenue. Total SELPA and program expenditures are subtracted from this total revenue to determine the excess costs. The unduplicated pupil count for K-22 year-old special education students is then divided into the excess cost, yielding a cost per unduplicated pupil count. Alternately, the total unduplicated pupil count may be divided by each district's unduplicated pupil count to determine the percentage of excess costs borne by each district. Finally, the excess costs are billed back to the district based on these unduplicated pupil counts.

The county office has developed innovative programs and services to blend pupils with mild, moderate and severe disabilities in the same service setting within their district of residence. This has reduced costs for facilities and transportation. At the same time, these service settings do not readily allow the tracking of costs by disability category or using the traditional budget categories of severe and non-severe.

Because the SELPA and county office budgets are merged into one budget, FCMAT was not able to independently track SELPA regional services and program specialist expenditures.

A 20% to 25% excess cost for the 2006-07 fiscal year can be anticipated; however, this cannot be documented because the year-end fiscal data for 2005-06 was not available at the time of this study. The excess costs may increase if a lower than expected COLA is applied to the special education ADA entitlement.

Under pre-AB 602 funding models, program operators could anticipate a 20% to 30% excess cost over revenues and a corresponding local general fund contribution. This local general fund contribution is now monitored by the MOE report required by the federal government to ensure that there is local support of special education programs and services. The SELPA's excess cost per pupil appears to be within an average range of 20%-30% of total costs.

The current SELPA formula for excess costs is based upon unduplicated pupil count totals. This does not account for the range of intensive needs that exists between non-severe disabilities and severe disabilities. The severe disability category historically

requires intensive related (duplicated) services (speech/language, adaptive physical education, occupational/physical therapy, etc.).

The SELPA executive committee participates in developing programs and services, and in budget development.

The County is experiencing population growth along transportation corridors. This will increase the number of pupils with disabilities and existing IEPs, requiring programs and services that may not be available within the current SELPA structure. Special education revenues, expenditures and excess costs will be affected by these changes.

Recommendations

The SELPA and county office should:

1. Consider separating the SELPA regional service/program service revenue and expenditures from the county office program and services budget. This would include doing the following:
 - Allocating administrative and support certificated and classified staff to the SELPA budget.
 - Filling the vacant Program Specialist position to the extent that funding is available in order to provide services required by E.C. Sections 56368 and 56836.23.
 - Allocating certificated and classified instructional staff to the county office program and services budget.
 - Ongoing monitoring of SELPA and county office revenues and expenditures.
2. Consider developing a SELPA formula which reflects the level of services from non-severe to severe and thus accounts for duplicated services.
3. Consider developing a SELPA formula based on total ADA rather than on special education pupil count. This would spread excess costs across a wider base and reduce the burden on small districts serving students with intensive needs.
4. Consider developing a basic program and service model that would allow individual districts to pay for basic special education services at a lower cost, with added costs for added services such as one-to-one aides or special health care.

*Comparable Counties***Table 17: Comparable Counties CBEDS/Pupil Count**

County	District	CBEDS	Special Ed. Pupil Count		Special Ed. %
			Residing in District	Served by District	Dist Res
Amador	Amador CYA Dist	445			
	Amador COE	259	0	174	0.00%
	Amador Unified	4,599	697	623	15.16%
	Total:	5,303	697	697	13.14%
Colusa	Colusa COE	99	13	576	13.13%
	Colusa Unified	1,428	173	0	12.11%
	Maxwell Unified	442	57	0	12.90%
	Pierce Jt Unified	1,289	189	0	14.66%
	Williams Unified	1,203	146	0	12.14%
	Total:	4,461	578	576	12.96%
Del Norte	Del Norte COE	989	0	0	0.00%
	Del Norte County Unified	4,053	554	551	13.67%
	Total:	5,042	554	551	10.99%

Amador, Del Norte and Colusa counties have similar CBEDS and unduplicated pupil counts, but some differences in other areas. The Amador County SELPA is a necessary small SELPA; the Amador county office and Amador Unified School District have a single superintendent and board; Amador Unified School District provides the majority of special education programs and services. The Del Norte county office and Del Norte Unified School District have a single superintendent and school board; Del Norte is joined with the Humboldt county SELPA; and Del Norte Unified School District provides all special education programs and services.

Salary Comparison

FCMAT did not review the internal structure of the districts' or county office's current salary schedules, or compare salaries to those of other school districts in Colusa County.

The SELPA's Local Plan includes a process for district representation in the collective bargaining process between the county office and the teachers' association. Some districts expressed concern regarding the long range fiscal impact of the county office's special education teacher salary schedule.

With an average salary of \$50,538 for certificated instructional personnel during the 2004-05 fiscal year, the county's salary ranks 22nd highest out of 35 counties for which FCMAT received data. The comparison includes all certificated instructional personnel for all county office-operated programs.

Budget Analysis

The county office finance department tracks expenditures for all special education programs. The following analysis will cover the following Resource 6500 budget categories:

- Goal 5001 Special Education Unspecified
- Goal 5730 Special Education Preschool
- Goal 5750 Special Education Severely Disabled
- Goal 5770 Special Education Non-Severely Disabled

Health and Welfare Benefits

The county office's health and welfare benefits package is capped. Full time employees are required to pay into the benefit fund an amount equal to the difference between the cap and the total cost of the benefit package. Many employees choose to work less than full time to avoid paying into the benefits package. This has resulted in significant savings on employee benefits.

It may benefit the county office and the districts to explore the possibility of forming a Joint Powers Agreement and seek a single countywide benefits package. This may reduce the cost of benefits countywide and assist employees who cannot currently buy into the benefits package. It may also benefit program quality and continuity by decreasing employee turnover.

Vacation Pay

Classified Employees are not allowed to take vacation days. They are paid for vacation days in addition to their regular salary. The county office may want to explore the possibility of allowing vacation days during the school year and hiring substitutes at a lower rate of pay. This may be a negotiable item.

Table 18: Goal 5001 Special Education Unspecified, Actual Costs, 2002-2005

Object:	Classification	Actual 02-03	Actual 03-04	% Inc/Dec	Actual 04-05	% Inc/Dec	Inc/Decr 02-05	% Inc/Dec
1310	Regular Supervisor/ Admin	\$78,467	\$78,467	0.00%	\$86,681	10.47%	\$8,214	10.47%
	Total 1000	\$78,467	\$78,467	0.00%	\$86,681	10.47%	\$8,214	10.47%
Object:	Classification	Actual 02-03	Actual 03-04	Percent Inc/Dec	Actual 04-05	% Inc/Dec	Inc/Decr 02-05	% Inc/Dec
2410	Regular Clerical and Office	\$53,659	\$60,393	12.55%	\$67,172	11.22%	\$13,513	25.18%
2420	Substitute Clerical and Office	\$0	\$36	100%	\$0	0%	0	0%
2430	Part-time Clerical & Office	\$0	\$3,337	100%	\$11,458	243.32%	\$11,458	100%
	Total 2000	\$53,659	\$63,767		\$78,630	23.31%	\$24,971	46.54%
Object:	Classification	Actual 02-03	Actual 03-04	% Inc/Dec	Actual 04-05	% Inc/Dec	Inc/Decr 02-05	% Inc/Dec
3101	STRS- Certificated	\$6,474	\$6,474	0.00%	\$7,151	10.47%	\$678	10.47%
3202	PERS-Classified	\$1,525	\$6,641	335.54%	\$7,589	14.28%	\$6,064	397.74%
3312	OASDI-Classified	\$3,120	\$3,648	16.92%	\$4,226	15.84%	\$1,106	35.44%
3321	MEDICARE- Certificated	\$1,130	\$1,117	-1.21%	\$1,232	10.31%	\$101	8.98%
3322	MEDICARE- Classified	\$730	\$853	16.90%	\$988	15.86%	\$259	35.45%
3401	Health & Welfare-Cert	\$5,486	\$5,281	-3.73%	\$6,112	15.73%	\$626	11.42%
3402	Health & Welfare-Class	\$7,335	\$7,873	7.33%	\$12,563	59.57%	\$5,228	71.27%
3501	State Unemploy Ins-Cert	\$145	\$374	157.75%	\$742	98.53%	\$597	411.71%
3502	State Unemploy Ins-Class	\$100	\$304	204.51%	\$676	122.57%	\$576	577.75%
3601	Worker's Comp- Certi	\$2,433	\$3,645	49.81%	\$3,467	-4.87%	\$1,034	42.51%
3602	Worker's Comp- Class	\$1,664	\$2,957	77.72%	\$3,145	6.36%	\$1,481	89.02%
3802	PERS Reduction- Class	\$2,260	\$0	-100.00%	\$0	0%	-\$2,260	-100.00%
	Total 3000	\$32,401	\$39,166	20.88%	\$47,892	22.28%	\$15,491	47.81%

Object:	Classification	Actual 02-03	Actual 03-04	% Inc/Dec	Actual 04-05	% Inc/Dec	Inc/Decr 02-05	% Inc/Dec
4300	Materials and Supplies	\$7,160	\$10,490	46.50%	\$9,390	-10.49%	\$2,230	31.14%
4400	Noncapitalization Equipment	\$6,008	\$4,736	-21.17%	\$3,290	-30.54%	-\$2,718	-45.25%
	Total 4000	\$13,169	\$15,226	15.62%	\$12,679	-16.73%	-\$490	-3.72%
Object:	Classification	Actual 02-03	Actual 03-04	% Inc/Dec	Actual 04-05	% Inc/Dec	Inc/Decr 02-05	% Inc/Dec
5200	Travel and Conference	\$10,237	\$7,781	-23.99%	\$10,486	34.76%	\$249	2.43%
5300	Dues and Memberships	\$875	\$950	8.57%	\$950	0.00%	\$75	8.57%
5500	Oper & Housekeeping Serv	\$10,676	\$8,896	-16.67%	\$14,665	64.86%	\$3,989	37.37%
5600	Rentals, Leases & Repairs	\$8,312	\$9,761	17.43%	\$21,576	121.04%	\$13,264	159.58%
5605	Storage	\$0	\$600		\$0	-100.00%	\$0	0%
5800	Consulting Serv/ Oper Exp	\$1,505	\$799	-46.94%	\$3,107	289.08%	\$1,602	106.43%
5805	Accrual Reconciliation	-\$423	\$0	100.00%	-\$74	-100.00%	\$349	82.50%
5845	Custodian	\$10,098	\$10,338	2.37%	\$12,540	21.30%	\$2,441	24.18%
5870	Legal Fees	\$3,421	\$621	-81.84%	\$2,204	254.69%	-\$1,218	-35.59%
5900	Communication	\$7,646	\$6,534	-14.53%	\$5,817	-10.99%	-\$1,829	-23.92%
	Total 5000	\$52,348	\$46,279	-11.59%	\$71,270	54.00%	\$18,922	36.15%
		Actual	Actual	%	Actual	%	Inc/Decr	%
Object:	Classification	02-03	03-04	Inc/Dec	04-05	Inc/Dec	02-05	Inc/Dec
6400	Equipment	\$0	\$0	0%	\$0	0%	-\$12,122	-100.00%
	Total 6000	\$0	\$0	0%	\$0	0%	-\$12,122	-100.00%
		Actual	Actual	%	Actual	%	Inc/Decr	Percent
Object:	Classification	02-03	03-04	Inc/Dec	04-05	Inc/Dec	02-05	Inc/Dec
7310	Direct Support Indirect Costs	\$181,096	\$184,640	1.96%	\$202,251	9.54%	\$21,155	11.68%
	Total 7000	\$181,096	\$184,640	1.96%	\$202,251	9.54%	\$21,155	11.68%
Total 1000-7000		\$411,141	\$427,546	3.99%	\$499,402	16.81%	\$88,261	21.47%

The SELPA regional and program specialist services have been included in the county office program budget. The major increase is in classified personnel and benefits and is due to increased staffing, salary step and column movements, and raises. The cost of benefits has increased correspondingly.

It is not possible to track SELPA or program expenditures in the Services and Other Operating Expenditures category.

The increase in Direct Support Indirect Cost is reflected by the increase in revenue and expansion of programs and service.

Recommendations

The county office and SELPA should:

1. Consider separating the revenues and expenditures for the SELPA regional and program specialist services from the revenues and expenditures for the county office program.
 - Document and allocate certificated and classified personnel to each budget and report all object expenditures accordingly.

The SELPA should:

2. Consider employing a program specialist, with the FTE to be determined based on available revenues.

Preschool Costs

Table 19: Goal 5730 Preschool, Actual Costs, 2002-2005

Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
1110	Regular Teachers	\$0	\$0	0.00%	\$794	100.00%	\$794	100.00%
1121	Long-Term Subs	\$0	\$0	0.00%	\$27,473	100.00%	\$27,473	100.00%
	Total 1000	\$0	\$0	0.00%	\$28,267	100.00%	\$28,267	100.00%
Object:	Classification	Actual 02-03	Actual 03-04	% Inc/Dec	Actual 04-05	% Inc/Dec	Inc/Decr 02-05	% Inc/Dec
2130	Part-time Instructional Aides	\$5,387	\$2,760	-48.76%	\$6,579	138.36%	\$1,193	22.14%
	Total 2000	\$5,387	\$2,760	-48.76%	\$6,579	138.36%	\$1,193	22.14%
Object:	Classification	Actual 02-03	Actual 03-04	% Inc/Dec	% 04-05	Percent Inc/Dec	Inc/Decr 02-05	Percent Inc/Dec
3101	STRS- Certificated	\$0	\$0	0.00%	\$2,264	100.00%	\$2,264	100.00%
3312	OASDI- Classified	\$334	\$171	-48.75%	\$408	138.34%	\$74	22.15%
3321	MEDICARE- Certificated	\$0	\$0	0.00%	\$398	0.00%	\$398	100.00%
3322	MEDICARE- Classified	\$78	\$40	-48.79%	\$95	138.39%	\$17	22.09%
3501	State Unemploy Ins-Certificated	\$0	\$0	0.00%	\$229	0.00%	\$229	100.00%
3502	State Unemploy Ins-Classified	\$10	\$53	418.60%	\$55	3.91%	\$45	438.85%
3601	Worker's Comp- Certificated	\$0	\$0	0.00%	\$1,099	0.00%	\$1,099	100.00%
3602	Worker's Comp- Classified	\$167	\$124	-26.05%	\$263	112.51%	\$96	57.15%
	Total 3000	\$590	\$388	-34.17%	\$4,812	1139.42%	\$4,222	715.88%
Object:	Classification	Actual 02-03	Actual 03-04	Percent Inc/Dec	Actual 04-05	Percent Inc/Dec	Inc/Decr 02-05	Percent Inc/Dec
4300	Materials and Supplies	\$400	\$0	-100.00%	\$449	0.00%	\$49	12.28%
	Total 4000	\$400	\$0	-100.00%	\$449	0.00%	\$49	12.28%
Object:	Classification	Actual 02-03	Actual 03-04	Percent Inc/Dec	Actual 04-05	Percent Inc/Dec	Inc/Decr 02-05	Percent Inc/Dec
5800	Consulting Serv/ Operating Exp	\$0	\$0	0.00%	\$319	100.00%	\$319	100.00%
	Total 5000	\$0	\$0	0.00%	\$319	100.00%	\$319	100.00%
Total 1000-7000		\$6,376	\$3,148	-50.62%	\$40,427	1184.00%	\$34,050	534.01%

The total preschool budget increased by \$34,050 from 2002 to 2005. Data indicate that during this period the preschool services grew from a program operated by part time classified staff to one operated by both classified and certificated personnel. The December 2005 pupil count showed 28 preschool special education pupils.

Although closing data for the 2005-06 fiscal year was not available at the time of FCMAT's study, the 2005-06 budget does not include certificated staff for preschool programs. Interviews indicated that the preschool program may not offer a full range of program options for some pupils.

Recommendations

The county office and SELPA should:

1. Consider providing additional administrative supervision and organization.
2. Consider providing program specialist services to identify appropriate preschool settings for preschool pupils and to develop the program and services.
3. Provide full or part time certificated personnel for the preschool special education program.

Severe Disability Costs

Table 20: Goal 5750 Severely Disabled, Actual Costs, 2002-2005

Object	Classification	Actual 2002-03	Actual 2003-04	Percent Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
1110	Regular Teachers	\$314,065	\$348,385	10.93%	\$387,364	11.19%	\$73,299	23.34%
1120	Sub Teachers	\$9,887	\$8,824	-10.76%	\$8,873	0.56%	-\$1,014	-10.26%
1121	Long-Term Subs	\$7,614	\$3,508	-53.92%	\$0	-100.00%	-\$7,614	-100.00%
1130	Prt-Tm Teacher	\$945	\$0	-100.00%	\$6,173	100.00%	\$5,228	553.19%
1210	Reg Pupil Suprt	\$131,674	\$135,922	3.23%	\$113,991	-16.14%	-\$17,683	-13.43%
1220	Sub Pupil Suprt	\$0	\$0	0.00%	\$23,863	100.00%	\$23,863	100.00%
1230	Prt-tm Pupil Suprt	\$4,280	\$2,573	-39.89%	\$29,950	1064.22%	\$25,670	599.76%
1910	Regular Othr Cert	\$15,761	\$16,424	4.21%	\$17,347	5.62%	\$1,586	10.06%
1930	Prt-Tm Othr Cert	\$0	\$2,400	100.00%	\$2,400	0.00%	\$2,400	100.00%
	Total 1000	\$484,226	\$518,036	6.98%	\$589,960	13.88%	\$105,734	21.84%
Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
2110	Regular Inst Aides	\$10,132	\$111	-98.90%	\$5,676	4993.80%	-\$4,457	-43.99%
2120	Sub Inst Aides	\$6,356	\$1,449	-77.20%	\$4,364	201.19%	-\$1,992	-31.34%
2130	Prt-tm Inst Aides	\$67,038	\$57,421	-14.35%	\$36,692	-36.10%	-\$30,347	-45.27%
2161	Inst Aide-Buyback	\$91	\$0	-100.00%	\$0	0.00%	-\$91	-100.00%
2410	RegCler and Off	\$9,961	\$10,458	4.99%	\$11,553	10.47%	\$1,592	15.98%
2460	Ovrtm Cler & Off	\$184	\$0	0.00%	\$0	0.00%	-\$184	-100.00%
2910	Reg Othr Class	\$24,265	\$174	-99.28%	\$22,471	12797.47%	-\$1,794	-7.39%
	Total 2000	\$118,028	\$69,614	-41.02%	\$80,755	16.00%	-\$37,272	-31.58%
Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
3101	STRS-Cert	\$38,702	\$42,487	9.78%	\$48,062	13.12%	\$9,360	24.18%
3102	STRS-Class	\$2	\$57	2722.66%	\$212	270.65%	\$210	10362.07%
3201	PERS- Cert	\$54	\$14	-74.07%	\$35	150.00%	-\$19	-35.18%
3202	PERS-Classified	\$2,766	\$4,883	76.54%	\$6,142	25.78%	\$3,376	122.05%
3302	OASDI/Medi/Alt- CLS	\$0	\$0	0.00%	-\$158	-100.00%	-\$158	-100.00%
3311	OASDI-Cert	\$793	\$0	-100.00%	\$248	100.00%	-\$545	-68.73%
3312	OASDI-Class	\$6,792	\$4,402	-35.20%	\$4,763	8.21%	-\$2,029	-29.88%
3321	MEDICARE-Cert	\$6,207	\$6,638	6.95%	\$7,584	14.25%	\$1,378	22.20%
3322	MEDICARE-Class	\$1,589	\$998	-37.18%	\$1,120	12.23%	-\$469	-29.50%
3401	H & W-Cert	\$54,604	\$58,412	6.97%	\$66,276	13.46%	\$11,672	21.38%
3402	H & W-Class	\$10,411	\$1,320	-87.32%	\$5,059	283.17%	-\$5,352	-51.41%
3501	State Unmply Ins- Cert	\$918	\$2,779	202.63%	\$4,929	77.32%	\$4,010	436.62%
3502	State Unmply Ins- Class	\$227	\$334	47.10%	\$3,498	948.55%	\$3,271	1442.40%
3601	Wrkr's Comp- Cert	\$15,037	\$25,866	72.02%	\$20,825	-19.49%	\$5,788	38.49%
3602	Wrkr's Comp- Class	\$3,657	\$3,530	-3.47%	\$3,306	-6.34%	-\$351	-9.59%

3801	PERS Reduct-Cert	\$77	\$0	-100.00%	\$0	0.00%	-\$77	-100.00%
3802	PERS Reduct-Class	\$4,075	\$0	-100.00%	\$0	0.00%	-\$4,075	-100.00%
	Total 3000	\$145,901	\$151,721	3.99%	\$171,902	13.30%	\$26,001	17.82%
		Actual	Actual	%	Actual	%	Inc/Decr	%
Object	Classification	2002-03	2003-04	Inc/Dec	2004-05	Inc/Dec	2002-05	Inc/Dec
4300	Mtrls and Splies	\$11,968	\$12,210	2.02%	\$14,413	18.04%	\$2,445	20.43%
4400	Non-capital Equip	\$0	\$3,627	100.00%	\$3,250	-10.39%	\$3,250	100.00%
	Total 4000	\$11,968	\$15,837	32.33%	\$17,663	11.53%	\$5,695	47.58%
		Actual	Actual	%	Actual	%	Inc/Decr	%
Object	Classification	2002-03	2003-04	Inc/Dec	2004-05	Inc/Dec	2002-05	Inc/Dec
5200	Travel and Conf	\$6,520	\$3,831	-41.24%	\$4,821	25.84%	-\$1,699	-26.06%
5300	Dues and Member	\$0	\$0	0.00%	\$135	100.00%	\$135	100.00%
	Operations & Housekeeping	\$224	\$251	12.15%	\$48	-80.96%	-\$176	-78.65%
5600	Rent, Leases & Repairs	\$10,140	\$11,386	12.29%	\$3,335	-70.71%	-\$6,805	0.00%
5800	Consult Serv/Op Exp	\$56,283	\$105,512	87.47%	\$47,340	-55.13%	-\$8,944	-15.89%
5890	Sutter County	\$40,697	\$13,400	-67.07%	\$32,721	144.18%	-\$7,976	-19.60%
5900	Communication	\$1,550	\$1,638	5.69%	\$1,265	-22.75%	-\$284	-18.36%
	Total 5000	\$115,414	\$136,018	17.85%	\$89,664	-34.08%	-\$25,750	-22.31%
		Actual	Actual	%	Actual	%	Inc/Decr	%
Object	Classification	2002-03	2003-04	Inc/Dec	2004-05	Inc/Dec	2002-05	Inc/Dec
6400	Equipment	\$12,122	\$874	-92.79%	\$0	-100.00%	-\$12,122	-100.00%
	Total 6000	\$12,122	\$874	-92.79%	\$0	-100.00%	-\$12,122	-100.00%
		Actual	Actual	%	Actual	%	Inc/Decr	%
Object	Classification	02-03	03-04	Inc/Dec	04-05	Inc/Dec	02-05	Inc/Dec
7310	Direct Support Indirect Costs	\$0	\$0	0.00%	\$0	0.00%	\$0	0.00%
	Total 7000	\$0	\$0	0.00%	\$0	0.00%	\$0	0.00%
Total 1000-7000		\$887,670	\$892,100	0.50%	\$949,944	6.48%	\$62,286	7.01%

Certificated personnel account for the majority of cost increases for services to severely disabled students from 2002-2005. This may be due to an increase in personnel and/or salary schedule modifications. At the same time, services for severely disabled students have experienced a reduction in classified instructional personnel, operational support and equipment expenditures. However, this cannot be fully evaluated without complete data.

Object 1000

The three year increase was \$105,734 or 21.84%. Expenditures for the 1110 object, Regular Teachers, have increased by 23.34% over the three year period. This may be due to program expansion, new staffing, step and column increases, and salary raises.

Expenditures for the 1121 object code, Long Term Substitutes, have decreased. This may be due to the hiring of qualified certificated staff to fill positions and/or the use of part time teachers with appropriate credentials.

The 1220 through 1930 objects reflect an increase related to personnel support for programs serving pupils with intense and severe disabilities.

Object 2000

The total three year decrease was \$37,272, or 31.58%.

Objects 2110 through 2130 have decreased over the past three years. This may be due to the hiring of certificated staff and/or the transition from traditional program settings to blended program settings and inclusion of special education students in regular classes.

Object 3000

The three year period shows an increase of \$26,001, or 17.8%, in these personnel costs. This smaller increase may be due to the decrease in classified personnel.

Object 4000

There is an increase of \$5,728, or 47.99%, over the three year period. This may be due to program expansion and/or changes required by the blending of students with different disabilities and the placement of special education students in regular classes.

Object 5000

There has been a decrease of \$25,750, or 22.31%, for the three year period. The reduction is reflected in a decrease in expenditures for travel and conferences, rents and leases, and consulting services.

Object 7000

There has been an increase of \$62,318, or 7.02%, for the three year period. This increase has been moderated by the decreases in Objects 2000, 5000 and 6000.

The 2005-06 budget includes \$68,849 for Object 2130, Part Time Instructional Aides. This is significantly higher than the 2004-05 expenditure of \$36,692 and would alter these findings. This increase may be the result of additional services required to implement the SELPA's strategies of blending students with varying disabilities and of placing special education students in regular classes when possible. However, the 2005-06 closing data was not available at the time of this review.

Recommendations

The county office and the SELPA should:

1. Compare this study's fiscal data with 2005-2006 closing data and with the findings in this report.
2. Monitor programs and services for pupils with intensive needs to ensure that students' needs are met.

Non-Severe Disability Costs

Table 21: Goal 5770, Non-Severe Disability, Actual Costs, 2002-2005

Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
1110	Regular Teachers	\$552,370	\$608,285	10.12%	\$669,636	10.09%	\$117,265	21.23%
1120	Substitute Teachers	\$13,139	\$13,839	5.33%	\$15,145	9.43%	\$2,006	15.27%
1121	Long-Term Substitutes	\$26,098	\$2,913	-88.84%	\$0	-100.00%	-\$26,098	-100.00%
1130	Part-Time Teacher	\$0	\$0	0.00%	\$24,151	100.00%	\$24,151	100.00%
1210	Regular Pupil Support	\$441,860	\$460,422	4.20%	\$441,381	-4.14%	-\$479	-0.11%
1220	Sub Pupil Support Salary	\$0	\$0	0.00%	\$2,564	100.00%	\$2,564	100.00%
1230	Prt-tm Pupil Suprt Salary	\$13,340	\$0	-100.00%	\$42,064	100.00%	\$28,724	215.32%
1910	Regular Other Cert	\$15,761	\$16,424	4.20%	\$17,347	5.62%	\$1,586	10.06%
	Total 1000	\$1,062,568	\$1,101,883	3.70%	\$1,212,286	10.02%	\$149,718	14.09%
Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
2110	Regular Inst Aides	\$20,410	\$111	-99.45%	\$5,693	5009.58%	-\$14,717	-72.11%
2120	Substitute Inst Aides	\$9,494	\$1,467	-84.55%	\$4,326	194.85%	-\$5,168	-54.44%
2130	Part-time Inst Aides	\$57,097	\$49,285	-13.68%	\$27,614	-43.97%	-\$29,483	-51.64%
2161	Inst Aide-Buyback	\$30	\$0	-100.00%	\$0	0.00%	-\$30	-100.00%
2410	Reg Clerical and Off	\$9,961	\$10,458	4.99%	\$11,553	10.47%	\$1,592	15.98%
	Total 2000	\$96,992	\$61,321	-36.78%	\$49,186	-19.79%	-\$47,806	-49.29%
Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
3101	STRS-Cert	\$84,972	\$90,568	6.59%	\$98,958	9.26%	\$13,986	16.46%
3102	STRS-Class	\$2	\$114	5515.27%	\$0	-100.00%	-\$2	-100.00%
3201	PERS- Cert	\$213	\$0	-100.00%	\$118	100.00%	-\$94	-44.36%
3202	PERS-Class	\$2,333	\$4,253	82.27%	\$3,303	-22.34%	\$969	41.55%
3302	OASDI/Medi/Alt-CLS	\$0	\$0	0.00%	-\$141	-100.00%	-\$141	0.00%
3311	OASDI-Cert	\$1,745	\$315	-81.95%	\$690	119.12%	-\$1,055	-60.45%
3312	OASDI-Class	\$5,521	\$3,718	-32.67%	\$2,919	-21.48%	-\$2,602	-47.13%
3321	MEDICARE-Cert	\$12,930	\$13,402	3.65%	\$14,894	11.13%	\$1,964	15.19%
3322	MEDICARE-Class	\$1,292	\$879	-31.92%	\$689	-21.64%	-\$603	-46.66%
3401	H & W-Cert	\$121,658	\$124,767	2.56%	\$127,745	2.39%	\$6,087	5.00%
3402	H & W-Class	\$10,466	\$1,320	-87.38%	\$3,361	154.59%	-\$7,104	-67.88%
3501	State Unemp Ins-Cert	\$2,019	\$7,675	280.11%	\$9,897	28.96%	\$7,878	390.18%
3502	State Unemp Ins-Class	\$187	\$295	58.02%	\$407	38.23%	\$221	118.43%
3601	Worker's Comp-Cert	\$33,041	\$54,787	65.82%	\$48,462	-11.55%	\$15,421	46.67%
3602	Worker's Comp-CI	\$3,016	\$3,191	5.81%	\$2,064	-35.32%	-\$952	-31.56%
3801	PERS Reduction-Cert	\$303	\$0	-100.00%	\$0	0.00%	-\$303	-100.00%
3802	PERS Reduc-Class	\$3,444	\$0	-100.00%	\$0	0.00%	-\$3,444	-100.00%
	Total 3000	\$283,141	\$305,285	7.82%	\$313,365	2.65%	\$30,224	10.67%

Object	Classification	Actual 2002-03	Actual 2003-04	Percent Inc/Dec	Actual 2004-05	Percent Inc/Dec	Inc/Decr 2002-05	Percent Inc/Dec
4300	Materials and Supplies	\$19,162	\$17,524	-8.55%	\$12,767	-27.14%	-\$6,395	-33.37%
4400	Non-capitalization Equip	\$0	\$3,250	100.00%	\$5,724	76.12%	\$5,724	100.00%
	Total 4000	\$19,162	\$20,774	8.41%	\$18,491	-10.99%	-\$671	-3.50%
Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
5200	Travel and Conference	\$8,797	\$9,295	5.66%	\$9,305	0.11%	\$508	5.77%
5600	Rents, Leases & Repairs	\$2,000	\$2,067	3.33%	\$0	-100.00%	-\$2,000	-100.00%
5900	Communication	\$367	\$0	-100.00%	\$0	0.00%	-\$367	-100.00%
	Total 5000	\$11,164	\$11,362	1.77%	\$9,305	-18.10%	-\$1,859	-16.65%
Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
6400	Equipment	\$0	\$0	0.00%	\$0	0.00%	\$0	0.00%
	Total 6000	\$0	\$0	0.00%	\$0	0.00%	\$0	0.00%
Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
7310	Direct Support Indirect Costs	\$0	\$0	0.00%	\$0	0.00%	\$0	0.00%
	Total 7000	\$0	\$0	0.00%	\$0	0.00%	\$0	0.00%
Total 1000-7000		\$1,473,027	\$1,500,625	1.87%	\$1,602,633	6.80%	\$129,606	8.80%

Object 1000

Object 1000, Certificated Personnel, shows an increase of \$149,718, or 14.09%.

Object 1100, Regular Teachers, shows an increase of \$117,265, or 21.23%, over the past three years. This may be due to increased personnel and/or salary schedule modifications.

Object 1121, Long Term Substitute, has decreased and Object 1130, Part Time Teacher, has increased. This may be due to the employment of qualified part time certificated personnel.

Objects 1210, Regular Pupil Support; 1220, Sub Pupil Support Salary; 1230, Part-time Pupil Support Salary; and 1910, Regular Other Certificated, have increased by \$32,395, or 6.4%, from 2002-2005. The greatest increase has been in Object 1230, Part-Time Pupil Support Personnel.

Object 2000

The county office reduced classified instructional aide expenditures by \$47,806, or 49.29%, from 2002-2005. The 2005-06 budget shows a total Object 2000 figure of \$57,393, a \$3,928 increase over the 2004-05 final figures. This is a moderate increase and may be due to salary step and column increases.

Object 3000

The reduction of classified instructional aides was reflected in a smaller increase in benefits. The three year increase in benefits was \$30,224, or 10.67%.

Object 5000

There has been a total decrease of \$1,203, or 107%, from 2002-2005. The decrease is reflected primarily in rents and leases and in consulting services.

Object 7000

There has been an increase of \$128,801, or 8.75%, for the three year period. However, this increase has been moderated by decreases in Objects 2000, 5000 and 6000.

Total benefit expenditures have increased less than in the past. This is due to a reduction in classified instructional assistants and an increase in the number of staff who choose to work less than full time in order to avoid paying for health and welfare benefits.

There has been a dramatic increase in the use of instructional assistants. The actual cost data for federal basic IDEA entitlement funds (see Appendix D) show that from 2002 through 2005 expenditures for instructional assistants and other classified expenditures in the severely disabled category increased by \$79,550, or 50.38%. In the non-severe category, these costs increased by \$50,919, or 33.90% during the same period. The increases may be due to step and salary increases; to the shifting of instructional assistants from the regular budget to the federal budget in order to reduce PERS costs; and/or to an increase in instructional assistants.

Data for these years also indicate a significant shift from full time to part time instructional assistants. This trend may be due to new part time positions, and/or to a reluctance to bear the increase in full time employees' out-of-pocket costs for health and welfare benefits. Health and welfare benefit expenditures decreased by 5.42% from 2002-2005.

Recommendations

The county office and the SELPA should:

1. Study the turnover rate of part time instructional personnel and the human resource department's recruitment and training costs.
2. Determine if the increase in part time instructional assistants is related to the blending and push-in strategies used by the SELPA. If so, develop and implement written policies and procedures for appropriate assignment of one-to-one instructional assistants.
3. Consider seeking other benefits packages that reduce or do not require employee out-of-pocket expenses. This may increase full time staff and reduce turnover and related recruitment and training costs.
4. Ensure that the SELPA executive committee makes it a priority to review and become more familiar with the fiscal condition of the SELPA, and communicates this information in an open and transparent manner to the SELPA member districts.

Over-Identification

Students who might benefit from alternative educational options are being referred to special education programs and services, resulting in over-identification. The four school districts within the Colusa County SELPA are concerned about the significant increase in bill-backs for services to special education students. The county office is the sole provider of all special education services, which have been provided in a full inclusion model in all districts since 1997. Full inclusion models can be effective; however, because they are provided by a variety of staff, continuous monitoring is needed to ensure student success.

California State Educational Management Information System (CASEMIS) data as of December 28, 2005, shows that the SELPA was serving 576 students, or 12.5% of all enrolled students, in special education. This is higher than the statewide average of approximately 10%.

The December 2005 CASEMIS data also showed 60 overdue annual Individualized Educational Plans (IEPs). However, at the time of FCMAT's review in July 2006, the number of overdue IEPs had been reduced to approximately 19. It appears that there are sufficient speech and language staff and an adequate number of school psychologists to provide assessments, including annual and triennial evaluations.

Student study teams (SSTs) are not implemented consistently. It appears that some schools have excellent models and alternatives to special education programs while other school sites have models which may not be effective or efficient.

Of the 576 special education students recorded in the December 2005 pupil count, 352 or 61.3% were Hispanic. The total number of Hispanic students in all SELPA districts is 2,703 or 62.0% of the total student population. It appears that there are limited alternative programs and services for the large number of Hispanic students within Colusa county and that SSTs may be referring students to special education rather than seeking or creating educational alternatives.

The number of students receiving speech and language services also appears to be high, as does the number of special education students in grades 9-12.

Some school districts have reading specialists, who could provide excellent services to students who might otherwise be referred to special education. The county superintendent expressed an interest in additional alternative models such as response to intervention (RTI) to provide alternatives for students who might otherwise be referred to special education.

Recommendations

The county office and SELPA should:

1. Encourage districts to create more educational options and opportunities for students to receive remedial instruction at each school site.
2. Consider developing programs to provide intense instruction in reading and math based on the needs of each student. These programs would serve students who might otherwise be inappropriately referred to special education. Weekly assessments of students in alternative programs should be performed to determine student progress, validate appropriate instruction, reassess and revise instruction as necessary, and inform parents of student performance.
3. Develop exit criteria to help parents to know when a student is eligible to receive special education services, when appropriate goals and services are met, and when students are no longer eligible for special education and should exit the program.

For example, if a student in a resource specialist program (RSP) has received appropriate instruction designed to meet his or her educational needs, then the student should be exited from special education. Exit criteria will help parents and staff better understand when a student no longer needs specially designed instruction. The SELPA may wish to contact the Sonoma County SELPA, which has excellent exit criteria for speech and language services.

4. Encourage districts to review services and program options for the large population of Hispanic students in Colusa County, and to consider these options before referring students for special education.
5. Ensure that the SELPA director receives and distributes to school district personnel information on workshops and conferences regarding RTI programs. The director should also include RTI information as an agenda item for future meetings.
6. Ensure that the SELPA director reviews overdue IEPs and determines why deadlines have been missed. Questions that should be asked include the following:
 - Are reports completed in a timely manner?
 - Are special education staff doing other activities such as SST meetings?
 - Are parents signing assessment plans?
 - Are parents attending IEP meetings? If not, are the meetings then rescheduled?
 - Are meetings held with staff to review concerns?
 - Are interpreters provided when needed?

Special education staff should be held accountable for timelines and services. Job descriptions should be updated and should include how staff will be held

accountable for IEP activities, including timelines.

7. Ensure that reading specialists collaborate and communicate with special education staff at school sites to share methods and instructional strategies for all students.
8. Train district administrators or their designees in IEP responsibilities under Education Code Section 56341(b)(4) and in the eligibility requirements for special education programs and services. This will give the districts more control over the referral process and the development of special education programs and services.

Leadership and Governance

School leadership has been a major topic of discussion and research for a number of years. There have been numerous collaborative efforts at the state and national level to define and describe the abilities, skills, behaviors and roles of an effective school leader. These efforts have provided educational leaders with outstanding direction and guidance regarding how to recognize their leadership skills. Quality tools have been developed to allow current administrators to evaluate their leadership skills and abilities, examine alternative abilities, skills and behaviors, and determine if they are effective leaders. The 2006 summer edition of *Special Edge*, a newsletter published three times per year by the Sonoma State University CalSTAT Project and funded by the State Department of Education, had as its headline, “Leadership is Not a Solo Act.” This excellent newsletter reviews leadership documents from numerous renowned leaders in the field, including Michael Fullan, Jim Collins, Rick and Becky DuFour and others. As education becomes more demanding and complex, administrators must continually assess their skills, competencies and practices to determine if they are effective leaders and to ensure that their leadership style is not a solo act.

School principals, district superintendents and county superintendents are playing a larger role in special education. Reasons for this include federal and state legislation and the fact that special education must be inclusive for all students. For students to be successful learners, site principals and their teams need to be involved in how all students will be included and ensure that each student receives an effective education.

This practice is especially important for Colusa County because the county office of education operates special education programs for the four school districts, an arrangement that requires all school leaders to work collaboratively and collectively on behalf of all students. The governance committees within the SELPA need to review, discuss and define leadership roles and responsibilities with regard to special education. The fact that leadership is not a solo act is especially true in Colusa County. District superintendents and the county superintendent must take a collaborative role in the operation of special education programs in order to be effective educational leaders.

There are some issues of trust and some territorial issues that should be discussed and resolved among the superintendents. In Colusa County, as in many counties that operate special education programs, there is always a need to regularly evaluate the leadership and collaboration among all parties to ensure an effective working relationship.

FCMAT found inconsistent implementation of site administrators’ duties and responsibilities with regard to special education. Principals and/or district superintendents do not consistently attend IEP meetings. Site and district administrators do not consistently participate in hiring or supervising county office special education personnel at their sites. The local plan does not sufficiently describe the roles and responsibilities of site administrators.

The SELPA's vision and mission statements may not be up to date and may not reflect the current intent and goals of the SELPA.

Districts have little or no input regarding the development of student programs and services. In practice, the SELPA director has the sole responsibility for the supervision of personnel, programs and services.

FCMAT found that site administrators are willing to provide leadership if it is clear that the SELPA and the district superintendents expect it. In *The New Meaning of Educational Change* (1991), Michael G. Fullan writes:

Principals are middle managers. As such, they face a classical organizational dilemma. Rapport with teachers is critical as is keeping supervisors happy. The endless supply of new policies, programs, and procedures ensures that the dilemma remains active. The expectation that principals should be leaders in the implementation of changes that they had no hand in developing and may not understand is especially troublesome. Generalities, such as 'the principal is the gatekeeper of change' or 'the principal and the school is the unit of change,' provide no practical clarity about what the principal could or should do. Given the other demands on the role, it is no wonder that most principals do not approach their change responsibility with enthusiasm. In the best of times very few of us go out of our way to do something that is both complex and unclear.

Although many principals have heard about some of the legal requirements and potential litigation related to special education, few if any have been provided with training regarding their role in special education or with ongoing staff development opportunities.

Principals can be change agents, but they have to be given authority, responsibility and accountability for their role in special education. School districts in Colusa County need to discuss this issue in detail and have a clear understanding of the role of administrators at all school sites, including high schools.

There is not a clear understanding of the role of the site administrator in the evaluation of certificated and classified special education employees at school sites. Special education employees are currently evaluated by the county administrator and staff, with little or no input from the school site. This process does not foster positive communication with the regular education staff and administration. Some special education employees want to have a sense of partnership with the school sites at which they serve; however, opportunities to foster partnership are lost when evaluations are conducted exclusively by county personnel.

Recommendations

The SELPA and the county office should:

1. Review the SELPA mission and vision statement to ensure that it meets the intent of the SELPA to serve special education students.
2. Provide leadership training for all school administrators.
3. Consider providing principals with in-service training regarding their role and responsibilities related to the county special education employees assigned to their sites. An administrative calendar should be developed each year and should include in-service topics, dates, locations, times and presenters. The SELPA director may wish to invite neighboring districts outside of Colusa County to some of the trainings. Training could include, but not be limited to, topics such as the IEP; litigation; full inclusion models; alternative programs; suspension and expulsion of special education students; RTI and other alternatives; how other school districts outside of Colusa County are providing special education services; the role of mental health; and the services of nonpublic schools and agencies.
4. Ensure that district and/or site administrators are given opportunities to provide input into the hiring, training and evaluation of county office special education personnel at their respective sites, and that they consistently participate in student study teams and the IEP process.
5. Review the governance committees and define their roles and responsibilities.
6. Include the governing boards of education in special education leadership training, and work to educate them regarding their leadership roles and responsibilities.
7. Ensure that the SELPA executive committee reviews the portions of the Local Plan that deal with hiring and evaluating special education staff. Site administrators should provide input in the hiring and evaluation process.
8. Ensure that the district superintendents and the county superintendent meet periodically to review their roles with regard to special education and the SELPA.
9. Consider including special education staff in district and/or site training, and encouraging their inclusion as active participants and partners with other educators at the school sites they serve. It is also important for the special education staff to provide training for the general education staff. General education staff are required to attend IEP meetings and be active participants; however, no training has been provided to help them learn their roles and responsibilities.

10. Conduct a SELPAwide needs assessment among general and special education staff, administrators, classified employees, parents and others. For a sample document, the county office might consult the Napa Valley Unified School District, which recently conducted a needs assessment in both English and Spanish.
11. Include county office employees in training that is educationally related and beneficial to all employees.
12. Provide instructional assistants with opportunities for ongoing training in a variety of areas relevant to their various assignments.
13. Ensure that there is ongoing communication with school sites regarding special education. This could take the form of a monthly e-mail or paper newsletter to the sites. The newsletter could include training dates and descriptions, profiles of new employees, information on new programs, articles highlighting topics of interest from SELPA council meetings, and other items.
14. Contact Karen Kearney, Director of WestED regarding the following publications:
California Professional Standards for Education Leadership (CPSELs).
Moving Leadership Standards into Everyday Work, Descriptions of Practice.
15. Discuss and communicate among the county and districts before decisions are made that may affect other districts or the county office.

Ownership

Personnel at some district and school sites have the misperception that students in county office special education programs are not the responsibility of the individual school districts. Every school district in California is responsible to serve all students, including all special education students. However, the service provider may be a school district or a county office, depending on how the local plan is written and approved by the State Board of Education.

California Education Code Section 56000 states that individuals with exceptional needs have a right to participate in a free appropriate public education and special educational services for these persons are needed in order to ensure them of the right to an appropriate educational opportunity to meet their unique needs.

This includes children younger than three years of age in accordance with the California Early Intervention Service Act, and children between the ages of three and five years of age.

The Colusa County Local Plan states that the county office will provide all special education programs and services on behalf of the school districts within Colusa County.

Some school sites include special education programs and services as part of the general education programs. This arrangement provides equal opportunities for special education staff and students to be a part of the school site.

Communication and cooperation is a key factor in this working relationship. When a cohesive working relationship among all staff is lacking, feelings of distrust can result. This same relationship currently exists among some district superintendents and the county superintendent. Building relationships and trust is critical to enhance education for all children.

In *The Dance of Change* (1999), Peter Senge writes:

Learn to see diversity as an asset. In meetings, acknowledge and respect the different views, skills and learning styles that different people bring. Some people will be enthusiastic; others will be skeptical. Allow both views to be heard. The more people sense that they are heard and recognized, the more completely they will trust their leadership and one another.

This is what needs to occur in Colusa County regarding special education. The school districts and the county office need to continually reinforce the message that special education students and staff are full participants and are fully supported by school sites, districts and the county office.

Recommendations

The county office should:

1. In partnership with the school districts, work to build a sense of team spirit, create awareness of how resources are used, and begin conversations about collaboration and pooling of resources to better serve students.
2. Work with the school districts to continually reinforce the message that special education students and staff are full participants and are fully supported by school sites, districts and the county office.
3. Ensure that discussion and communication occur before decisions are made that will affect districts or the county office. All parties should be informed and have the opportunity to provide input.

The Local Plan

California Education Code Section 56000 describes the restructuring of the Master Plan for Special Education, which was significantly revised in the 1980s. Special Education Local Plan Areas (SELPA) were formed to provide all children an opportunity to receive improved special education services. This could only be accomplished by developing a size and scope formula for school districts and county offices to use when developing their local plans. All original local plans were carefully reviewed by the state Department of Education to ensure that the configurations met particular standards. Each local plan area was required to identify Responsible Local Agencies (RLAs) to provide fiscal monitoring and auditing. Individual RLAs were to receive federal and state funds, but were required to identify governance structures for each local plan, describing how funds were to be expended.

Areas that must be addressed in local plans include the following:

- Distribution of funds
- Personnel
- Roles of local Boards
- Superintendent's role and responsibility
- Voting
- Program Delivery

The Colusa County SELPA was configured with a three-tiered governance structure which identifies the roles and responsibility of the local districts and the county office of education. Every SELPA must have in place a local plan, which is the backbone of the SELPA organization. The more definitive the local plan, the more functional each level of the governance structure becomes and the easier it is to provide services.

Local plans need to include SELPA policies and procedures so they can be followed by all local educational agencies (LEAs). Following is a minimum list of the areas for which policies and procedures should be in place and operational:

- Bill-backs
- Transportation
- Program operation
- Personnel
- Program delivery
- Extended year
- Governance
- Suspension and expulsion
- Private schools
- Charter schools

The current Local Plan is not up to date; FCMAT found numerous governance and other issues that are not sufficiently addressed in the current local plan or SELPA policies. These include, but are not limited to, the following:

- Dispute resolution
- Executive committee and SELPA council roles and responsibilities
- The role and responsibilities of the county office governing board
- The financial responsibilities of the school districts and the county office with regard to due process issues

In addition, it appears that the Local Plan defines similar duties for the executive committee and for the SELPA council.

The Local Plan gives the Colusa county board of education three distinct roles with regard to special education:

1. Acting as the RLA for special education
2. Operating all special education programs within Colusa county
3. Employing special education administrators and staff, including the SELPA director

This section of the local plan should be reviewed as soon as possible and changed to reflect current law. Hiring and supervising special education staff is the legal responsibility of the Colusa County Superintendent of Schools, not the county board of education. However, the plan does not clearly describe or distinguish the separate roles of the SELPA and the county office with regard to special education programs and services.

There are currently no organizational charts for the county office, or for the governance structures within the SELPA.

The Local Plan states that the executive committee will assist the county superintendent in hiring and annually evaluating the SELPA director; however, this does not appear to be implemented.

The SELPA's current assurance statement is not sufficiently detailed and does not provide the SELPA with adequate instruction and guidance in their work.

There appears to be confusion regarding the role of the RLA and the county office of education. The Colusa County Office of Education is the RLA and is designated to receive all federal and state funds and allocate all funds in accordance with the decisions of the executive committee. The staffing and operation of special education services is the responsibility of the County Superintendent of Schools. There is some confusion in some sections of the Local Plan regarding these two distinct roles.

For example, the role of the RLA is not distinguished or separated in the Local Plan's transfer of programs section, and as a result there is no clear description of how programs may be transferred from the county office.

The current Local Plan document sometimes discusses the same topic more than once. For example, due process is discussed in the procedural safeguard section and again in

the budget section. In addition, the Local Plan document's formatting uses multiple fonts, which can be somewhat confusing.

The executive committee receives financial information; however, members of the committee do not feel that they are provided with sufficiently detailed information when they must make financial decisions. The SELPA does not currently have a committee of chief business officials (CBOs) or other financial experts to provide this information.

School districts within the SELPA do not currently have a district SELPA representative other than their superintendent. District representatives can improve communication between districts and a SELPA, and can help improve staff development, program design, prevention activities and other aspects of special education. District representatives can also act as their superintendent's designee when needed.

Recommendations

The county office and the SELPA should:

1. Ensure that the executive committee forms a local plan committee to review the entire local plan, make revisions, and develop new policies as needed to ensure that appropriate services are provided to students and families.
2. Revise the local plan, particularly the section on governance. The language in the local plan stating that the county board of education is responsible for hiring and supervising special education staff should be changed as soon as practicable. To comply with current law, the plan should make it clear that the Colusa County Superintendent of Schools has this responsibility.

The plan should clearly delineate and distinguish the separate roles of the SELPA, the county office and school districts with regard to governance and the delivery of special education programs and services.

The executive committee should review in detail and revise the governance section of the local plan. The intent should be to ensure that the local plan clearly articulates the decision-making needs of the SELPA. Any revision should include details regarding each level and area of governance, including membership, voting, agendas, minutes, and other items. The purpose of each governance unit should also be clearly described in the local plan. Organizational charts should be developed for the county office and the governance structures within the SELPA.

The county superintendent and district superintendents should work together as a group to review and revise the role and purposes of the executive committee and the SELPA council as defined in the local plan. Membership and voting should be clearly addressed in the revision of the local plan.

The section of the local plan which describes the transfer of programs should also be revised to provide a clear process for how programs may be transferred from

the county office. Clarify that the role of the RLA is separate and distinct from this process.

Revise the due process section of the local plan so that it clearly describes the financial responsibilities of the school districts and county office with regard to due process issues.

Consider changing the format of the local plan document so that the same font is used throughout and so that any specific topic is discussed in only one section of the document whenever possible.

3. Consider changes that will result in the SELPA executive committee making decisions about special education based on recommendations from the SELPA director. It is usually the role of the SELPA director to develop agendas with the committee chairperson and to provide the necessary backup for each agenda item. FCMAT suggests that the SELPA director make recommendations on agenda items, but not be a voting member.
4. Consider changing the composition of the executive committee so that it is made up only of superintendents.
5. Review the community advisory committee (CAC), its duties and responsibilities. Consider scheduling this committee's meetings no more frequently than once per quarter.
6. Consider reviewing the role of the CAC member on the SELPA council.
7. Implement the section of the local plan which states that the executive committee will assist the county superintendent in hiring and annually providing input for the evaluation of the SELPA director. Schedule a date for this activity.
8. Review the dispute resolution process.
9. Ensure that the executive committee considers forming a committee of chief business officials (CBOs) that will meet monthly with the SELPA director and the assistant superintendent of business services to develop detailed financial information that will assist the executive committee in making financial decisions. These meetings should have minutes and agendas, be scheduled and placed on the calendar at the beginning of each school year, and be chaired by the SELPA director.
10. Ensure that each school district appoints a district SELPA representative, other than the district superintendent, to provide better communication between the school districts and the SELPA director. These individuals could work with the SELPA on a variety of activities, including staff development, prevention activities, and program implementation and design. These individuals could also act as their respective superintendent's designee in the absence of their superintendent.

Special Education Delivery Systems

The SELPA does not have a consistent process of reviewing the delivery systems for special education programs and services. Many districts have formed advisory committees for this purpose and have seen improved services and efficiency of delivery.

Training

Consistent training is needed in many areas in order for personnel to become more effective in delivering services to students. Superintendents and local and county boards of education need training regarding their roles and responsibilities in the area of special education. School principals need training in legal and financial matters related to special education, and in developing alternative services for students who might otherwise be referred to special education.

Interviews with instructional assistants revealed that there is very little in-service training in competencies, strategies or the handicapping conditions of students. In addition, there appears to be little communication with certificated staff.

In-service training at school sites is provided by the districts, but may not always be appropriate for the special education programs and services at sites. The in-service training provided by the county office is not needs-based and it is possible that required training is not provided, including training in CPR, CPI, blood-borne pathogens and other areas.

Transportation

Special education transportation services are efficient, but lack policies, procedures and a parent handbook. In addition, drivers do not receive ongoing training in lifting and transporting medically fragile children, and vans are not inspected and serviced regularly to ensure safety.

Handbooks

Teachers and parents do not currently receive handbooks with information about special education. Several such handbooks are available and could be useful tools for both training and communication.

One-to-One Assistants

The SELPA does not have policies, procedures or criteria regarding the use of one-to-one instructional assistants. As a result, IEP teams currently make decisions about one-to-one aides with little guidance.

Preschool Services

Preschool special education students are served in Head Start programs. There are no preschool special education programs in schools, except for services to four medically fragile students. Under the current arrangement, no services are available for new special education students once Head Start reaches its quota. This situation presents a compliance issue which should be resolved at the executive committee level.

Current data shows a pupil count of infants receiving special education services as follows: one infant in 2005; no infants in 2004; and 12 infants in 2003.

Recommendations

The county office and the SELPA should:

1. Consider developing a program advisory committee to review the delivery model for special education services. Full inclusion models can be very effective; however they need to be monitored and reviewed annually. This committee could be made up of principals, general and special education staff, parents and students. The purpose of this committee would be to evaluate programs and services SELPAwide. The committee would review each school site and assess the special education programs to answer the following questions:
 - What staff development has been provided to general and special education teachers?
 - How are students instructed and are students making progress?
 - How is the principal involved in special education?
 - Is the student study team effective?
 - How many students have been referred and how many students have been dismissed in a year?
 - How are parents informed of student progress?
 - Is the delivery of services meeting the needs of special education students?

School sites should be informed in advance of the purpose of the committee's site reviews. The committee should develop a calendar for its reviews and present the findings for each school site to the superintendents' council.

2. Provide appropriate and ongoing in-service training to staff, superintendents, district and county boards of education, principals and others. Superintendents and boards of education should receive training regarding their roles and responsibilities in the area of special education. Site principals should receive training in the financial and legal aspects of special education, and in the development of alternative services.

3. Develop policies and procedures for special education transportation. Produce a parent handbook in both English and Spanish.
4. Provide drivers with ongoing training in lifting and transporting medically fragile children.
4. Ensure that vans are inspected and serviced regularly to ensure safety.
5. Consider reviewing and providing to staff and parents existing handbooks that may be useful, including *A Parent Guide to Special Education*, the *Special Education Handbook for all Teachers*, and other similar publications.
6. Develop policies and procedures for the use of one-to-one assistants. Consider contacting the special education division of the Irvine Unified School District to request a copy of their policy.
7. Review and assess the use of Head Start services for special education preschoolers to determine if other program options are needed. Ensure that the executive committee and the SELPA director develop a plan for the delivery of special education services to preschoolers. This should take place as soon as practicable in order to decrease the likelihood of noncompliance.
8. Review services to infants. The executive committee and the SELPA director should also take part in this review.

Appendices

Appendix A: Excerpt from Colusa Special Education Local Plan section on Governance

Appendix B: Pupil Count Data

Appendix C: Federal IDEA Basic Entitlements and Grants Data

Appendix D: Study Agreement

Appendix A: Excerpt from Colusa Special Education Local Plan section on Governance

COLUSA SPECIAL EDUCATION LOCAL PLAN AREA:

A. SELPA GOVERNANCE,

1A. Responsibilities of the Executive Committee:

- (1) Review and make recommendations on the Local Plan for Special Education to the SELPA Council.
- (2) Recommend priorities for special education services.**
- (3) Advise the Administration on the deliverance of services.**
- (4) Formulate and review policy on the provision of special education services, including transportation.**
- (5) Review and make formal recommendations to the SELPA Council.
- (6) Elect chairperson for one year term in July or August. The chairperson shall chair meetings and provide agenda items to the SELPA Director. The chairperson will also act as the SELPA Council Chairperson. The committee could elect to rotate the chairperson in the following manner: Williams, Maxwell, Colusa, Pierce. Note: CAC on SELPA Council (non-voting)
- (7) Participate in special education program evaluations.**
- (8) Review IPS unit distribution.

B. SELPA ADMINISTRATION, 1. Employment of Staff:

The County board with input from the SELPA Council and Community Advisory Committee shall identify the staff necessary for the special education programs. The superintendent is responsible for the employment of all staff. A representative appointed by the district will participate in all hiring of special education certificated staff within the district. **The District Superintendent, or designee, will have input in all certificated and classified staff evaluations as consistent with contractual agreements.** A parent will be invited to participate in the hiring of special education certificated staff.

Appendix B: Pupil Count Data

Table 1: Colusa County CBEDS Data

Year	Colusa Unified	Maxwell Unified	Pierce Joint Unified	Williams Unified	Total
2002	1,538	455	1,225	1,006	4,224
2003	1,497	447	1,237	1,055	4,236
+/-	-2.67%	-1.76%	0.98%	4.87%	0.28%
2004	1,442	455	1,279	1,139	4,315
+/-	-3.67%	1.79%	3.40%	7.96%	1.86%
2005	1,428	442	1,289	1,203	4,362
+/-	-0.97%	-2.86%	0.78%	5.62%	1.09%
Total Change, 2002-2005	-7.15%	-2.86%	5.22%	19.58%	3.27%

The countywide total CBEDS count has increased by 3.27% from 2002 through 2005, with some districts experiencing modest declines in enrollment and others experiencing enrollment increases.

Table 2: Pupil Count Historical Data, Mild Disabilities

Year	SLI	OHI	SLD	Total
2002	232	16	230	478
2003	230	27	243	500
+/-	-0.86%	68.75%	5.65%	4.60%
2004	230	17	266	513
+/-	0.00%	-37.04%	9.47%	2.60%
2005	215	20	287	522
+/-	-6.52%	17.65%	7.89%	1.75%
Total Change, 2002-2005	-7.33%	25.0%	24.78%	9.20%

The unduplicated count of speech and language impaired (SLI) pupils has decreased from 2002 to 2005. This may be a result of the strict application of eligibility criteria and guidelines.

There has been a significant increase in the unduplicated pupil count in the severe learning disabilities (SLD) category from 2002-2005. This may be a result of responses to No Child Left Behind (NCLB) requirements; state Academic Performance Index (API) measurements; reduced funding for alternative educational options prior to referral for special education services; and new students entering the district with established IEPs.

The total unduplicated count has increased 8.66% from 2002 through 2005, more than double the increase of the CBEDS count for the same period. A total of 13.2% of pupils

in the SELPA, including the infant and preschool populations, are receiving special education services.

Table 3: Pupil Count Historical Data, Severe Disabilities

Year	MR	MD	ED	DB	AUT	TBI	Total
2002	17	6	6	0	5	1	35
2003	17	4	7	0	9	0	37
+/-	0.00%	-33.33%	16.67%	0.00%	80.00%	-100.00%	5.71%
2004	20	0	10	0	10	1	41
+/-	17.65%	-100.00%	42.86%	0.00%	11.11%	100.00%	10.81%
2005	22	2	5	0	8	0	37
+/-	10.00%	100.00%	-50.00%	0.00%	-20.00%	-100.00%	-9.76%
Total Change, 2002-2005	29.41%	-66.66%	-16.66%	0.00%	60.00%	-100.00%	5.71%

The unduplicated count percentages for severe disabilities vary greatly because of the small number of pupils in these programs; minor shifts in pupil counts can cause large changes in percentage.

Pupils with severe disabilities require intensive direct instructional services (DIS) and support personnel such as counselors and specialized physical health care staff. Thus a small increase in pupil count can have a major fiscal impact.

The number of pupils with mental retardation and the number of pupils with autism have grown significantly. These populations tend to have a long term impact on direct services, related services and support services. Longitudinal programs, services, support and inter-agency cooperation are required to provide an adequate program.

Table 4: Pupil Count Historical Data, Low Incidence

Year	HH	DEAF	VI	OI	Total
2002	7	1	0	6	14
2003	7	0	0	4	11
+/-	0.00%	-100.00%	0.00%	-33.33%	-21.43%
2004	8	0	1	7	16
+/-	14.29%	0.00%	100.00%	75.00%	45.45%
2005	6	0	4	7	17
+/-	-25.00%	0.00%	300.00%	0.00%	6.25%
Total Change, 2002-2005	-14.28%	-100.00%	400.00%	16.66%	21.43%

The percentage of low incidence pupils is relatively low at 6.95% of the total special education pupil count of 576 for December 2005.

Hard of hearing, deaf, visually impaired and deaf/blind pupils require highly qualified certificated and classified personnel. Increases in this population can have a major impact on the SELPA's services and expenditures.

Because orthopedically impaired students can be served by trained certificated personnel with the support of school nurses, the SELPA is using its own staff to serve these students.

Table 5: State/Colusa COE Pupil Count Data, December 2005

Area	State		Colusa COE	
	Count	Percent	Count	Percent
Summary				
Low Incidence	32,901	4.82%	17	2.95%
Non SH	536,217	78.49%	522	90.63%
SH	114060	16.70%	37	6.42%
Total:	683,178	100.00%	576	100.00%

The SELPA has a lower pupil count than the state average in the low incidence and severely handicapped categories. As a result, requirements and expenditures for intensive services and support are reduced. At the same time, the SELPA has a higher than average pupil count in the non-severe categories, resulting in an efficient service and support model.

Appendix C: Federal IDEA Basic Entitlements and Grants Data

Budgets Reviewed

Closing fiscal data for 2005-06 was not available at the time of this report. The following Federal budget entitlements and grants were compared for the years 2002-03, 2003-04, and 2004-05:

- 3310 Basic IDEA Entitlement: non-severely disabled and severely disabled
- 3315 IDEA Preschool Grant
- 3320 IDEA Preschool Entitlement
- 3330 IDEA Infant Discretionary
- 3360 IDEA Low Incidence Entitlement
- 3385 IDEA Early Intervention Grant
- 3405 SPED Work Ability I

Table 1: 3310 Basic IDEA Entitlement: Severely Disabled

Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
2110	Regular Inst Aides	\$117,894	\$59,424	-49.60%	\$44,961	-24.34%	-\$72,933	-61.86%
2120	Substitute Inst Aides	\$4,049	\$1,492	-63.16%	\$624	-58.17%	-\$3,425	-84.59%
2130	Part-time Inst Aides	\$35,897	\$109,318	204.53%	\$158,695	45.17%	\$122,799	342.09%
2161	Inst Aide-Buyback	\$71	\$0	-100.00%	\$0	0.0%	-\$71	-100.00%
2910	Regular Other Class	\$0	\$31,145	100%	\$33,180	6.53%	\$33,180	100%
	Total 2000	\$157,910	\$201,378	27.53%	\$237,460	17.92%	\$79,550	50.38%
3102	STRS-Class	\$734	\$3,842	423.56%	\$3,775	-1.73%	\$3,041	414.50%
3202	PERS-Class	\$3,499	\$15,681	348.17%	\$16,888	7.69%	\$13,389	382.64%
3311	OASDI-Cert	\$7,712	\$8,101	5.05%	\$0	-100.00%	-\$7,712	-100.00%
3312	OASDI-Class	\$0	\$1,755	100%	\$12,184	594.12%	\$12,184	100%
3322	MEDICARE-Class	\$1,896	\$2,395	26.32%	\$2,937	22.66%	\$1,041	54.94%
3402	H & W-Class	\$44,289	\$44,983	1.57%	\$41,890	-6.88%	-\$2,399	-5.42%
3502	State Unemp Ins-Class	\$302	\$974	222.32%	\$1,891	94.04%	\$1,588	525.42%
3602	Worker's Comp-Class	\$4,922	\$9,519	93.38%	\$9,344	-1.83%	\$4,422	89.83%
	Total 3000	\$63,353	\$87,249	37.72%	\$89,067	2.08%	\$25,714	40.59%
5200	Travel and Conference	\$0	\$246	100%	\$0	-100.00%	\$0	0.0%
	Total 5000	\$0	\$246	100%	\$0	-100.00%	\$0	0.0%
7310	Direct Suppt Indt Costs	\$30,183	\$37,418	23.97%	\$42,521	13.64%	\$12,338	40.88%
	Total 7000	\$30,183	\$37,418	23.97%	\$42,521	13.64%	\$12,338	40.88%
	Total 1000-7000	\$251,447	\$326,292	29.77%	\$369,048	13.10%	\$117,601	46.77%

Table 2: 3310 Basic IDEA Entitlement: Non-Severely Disabled

Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
2110	Regular Inst Aides	\$115,480	\$59,383	-48.58%	\$44,948	-24.31%	-\$70,532	-61.08%
2120	Substitute Inst Aides	\$119	\$1,491	1158.13%	\$660	-55.73%	\$542	457.00%
2130	Part-time Inst Aides	\$35,057	\$110,033	213.87%	\$156,037	41.81%	\$120,980	345.10%
2161	Inst Aide-Buyback	\$71	\$0	-100.00%	\$0	0.00%	-\$71	-100.00%
	Total 2000	\$150,726	\$170,907	13.39%	\$201,645	17.98%	\$50,919	33.78%
3102	STRS-Class	\$756	\$743	-1.62%	\$785	5.58%	\$29	3.86%
3202	PERS-Class	\$3,277	\$15,677	378.35%	\$17,325	10.51%	\$14,047	428.62%
3312	OASDI-Class	\$7,293	\$8,143	11.66%	\$10,293	26.40%	\$3,000	41.13%
3322	MEDICARE-Class	\$1,800	\$1,994	10.78%	\$2,495	25.08%	\$694	38.57%
3402	Health & Welfare-Class	\$41,136	\$39,114	-4.91%	\$38,495	-1.58%	-\$2,641	-6.42%
3502	State Unemp Ins-Class	\$273	\$823	201.78%	\$1,625	97.31%	\$1,352	495.43%
3602	Worker's Comp-Class	\$4,663	\$8,009	71.76%	\$8,105	1.20%	\$3,442	73.82%
	Total 3000	\$59,198	\$74,505	25.86%	\$79,263	6.39%	\$20,065	33.90%
5200	Travel and Conference	\$0	\$246	100%	\$0	-100.00%	\$0	0
	Total 5000	\$0	\$246	100%	\$0	-100.00%	\$0	0
	Total 1000-7000	\$209,924	\$245,659	17.02%	\$280,908	14.35%	\$70,984	33.81%

Table 3: 3315 IDEA Preschool Grant

Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
1110	Regular Teachers	\$21,846	\$22,671	3.78%	\$22,147	-2.31%	\$301	1.38%
	Total 1000	\$21,846	\$22,671	3.78%	\$22,147	-2.31%	\$301	1.38%
3101	STRS-Cert	\$1,798	\$1,874	4.24%	\$1,822	-2.80%	\$24	1.33%
3321	MEDICARE-Cert	\$298	\$304	1.99%	\$292	-4.06%	-\$6	-2.16%
3401	Health & Welfare-Cert	\$2,037	\$2,037	0.00%	\$2,377	16.66%	\$339	16.66%
3501	State Unemp Ins-Cert	\$41	\$114	173.96%	\$182	60.57%	\$141	339.90%
3601	Worker's Comp-Cert	\$679	\$1,127	66.01%	\$886	-21.37%	\$207	30.53%
	Total 3000	\$4,854	\$5,456	12.41%	\$5,559	1.88%	\$705	14.52%
4300	Materials and Supplies	\$132	\$119	-10.41%	\$96	-19.08%	-\$36	-27.51%
	Total 4000	\$132	\$119	-10.41%	\$96	-19.08%	-\$36	-27.51%
5200	Travel and Conference	\$457	\$971	112.37%	\$0	-100.00%	-\$457	-100.00%
5600	Rentals, Leases & Repairs	\$0	\$536	100%	\$0	-100.00%	\$0	0.0%
	Total 5000	\$457	\$1,507	229.58%	\$0	-100.00%	-\$457	-100.00%
7310	Direct Suppt Indrt Csts	\$1,910	\$2,083	9.03%	\$1,946	-7.04%	\$36	1.87%
	Total 7000	\$1,910	\$2,083	9.03%	\$1,946	-7.04%	\$36	1.87%
Total 1000-7000		\$29,199	\$31,835	9.03%	\$29,748	-7.02%	\$549	1.88%
8182	SPED Discr Grants	\$29,199	\$31,836	9.03%	\$29,748	-7.02%	\$549	1.88%
	Total 8000	\$29,199	\$31,836	9.03%	\$29,748	-7.02%	\$549	1.88%
Balance		\$0	\$1	100%	\$0	-100.00%	\$0	0.0%

Table 4: 3320 IDEA Preschool Entitlement

Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-2005	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
1110	Regular Teachers	\$9,363	\$9,716	3.78%	\$12,457	28.21%	\$3,095	33.06%
	Total 1000	\$9,363	\$9,716	3.78%	\$12,457	28.21%	\$3,095	33.06%
3101	STRS-Certificated	\$771	\$803	4.25%	\$1,025	27.65%	\$255	33.08%
3321	MEDICARE-Certificated	\$128	\$130	1.98%	\$168	28.92%	\$40	31.48%
3401	Health & Welfare-Certificated	\$873	\$873	0.00%	\$1,019	16.67%	\$146	16.67%
3501	State Unemploy Ins-Certificated	\$18	\$49	173.93%	\$108	121.44%	\$90	506.59%
3601	Worker's Comp-Certificated	\$291	\$483	66.01%	\$498	3.20%	\$207	71.32%
	Total 3000	\$2,080	\$2,338	12.41%	\$2,818	20.53%	\$738	35.48%
4300	Materials and Supplies	\$757	\$7,959	951.33%	\$1,633	-79.49%	\$876	115.66%
	Total 4000	\$757	\$7,959	951.33%	\$1,633	-79.49%	\$876	115.66%
5200	Travel and Conference	\$1,923	\$0	-100.00%	\$2,461	100.00%	\$537	27.93%
5600	Rentals, Leases & Repairs	\$0	\$1,045	100%	\$0	-100.00%	\$0	0.00%
5800	Consulting Serv/ Operating Exp	\$0	\$3,230	100%	\$4,815	49.07%	\$4,815	100%
	Total 5000	\$1,923	\$4,275	122.27%	\$7,276	70.18%	\$5,352	278.25%
7310	Direct Support Indirect Costs	\$989	\$1,700	71.94%	\$1,693	-0.40%	\$704	71.25%
	Total 7000	\$989	\$1,700	71.94%	\$1,693	-0.40%	\$704	71.25%
	Total 1000-7000	\$15,112	\$25,989	71.98%	\$25,877	-0.43%	\$10,765	71.24%
8182	Special Education Discr Grants	\$15,112	\$25,989	71.98%	\$25,877	-0.43%	\$10,765	41.60%
	Total 8000	\$15,112	\$25,989	71.98%	\$25,877	-0.43%	\$10,765	41.60%
	Balance	\$0	\$0	0.00%	\$0	0.00%	\$0	0.00%

Table 5: 3330 IDEA Infant Discretionary

Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
1160	Extra Duty Pay	\$2,562	\$93	-96.38%	\$0	-100.00%	-\$2,562	-100.00%
	Total 1000	\$2,562	\$93	-96.38%	\$0	-100.00%	-\$2,562	-100.00%
2910	Regular Other Class	\$578	\$0	-100.00%	\$0	0.00%	-\$578	-100.00%
2930	Part-Time Other Class	\$0	\$1,122	100%	\$459	-59.11%	\$459	100%
	Total 2000	\$578	\$1,122	94.11%	\$459	-59.11%	-\$119	-20.63%
3101	STRS-Cert	\$211	\$8	-96.38%	\$0	-100.00%	-\$211	-100.00%
3202	PERS-Class	\$17	\$117	608.12%	\$46	-60.94%	\$29	176.56%
3312	OASDI-Class	\$32	\$62	94.79%	\$27	-57.24%	-\$5	-16.71%
3321	MEDICARE-Cert	\$36	\$1	-96.27%	\$0	-100.00%	-\$36	-100.00%
3322	MEDICARE-Class	\$8	\$15	94.80%	\$6	-57.29%	-\$1	-16.80%
3501	State Unemp Ins-Cert	\$5	\$0	-91.85%	\$0	-100.00%	-\$5	-100.00%
3502	State Unemp Ins-Class	\$1	\$6	364.34%	\$3	-47.75%	\$2	142.64%
3601	Worker's Comp-Cert	\$78	\$4	-94.49%	\$0	-100.00%	-\$78	-100.00%
3602	Worker's Comp-Class	\$18	\$50	180.32%	\$18	-63.08%	\$1	3.50%
	Total 3000	\$406	\$263	-35.12%	\$100	-62.00%	-\$306	-75.35%
4300	Materials and Supplies	\$101	\$459	352.02%	\$0	-100.00%	-\$101	-100.00%
	Total 4000	\$101	\$459	352.02%	\$0	-100.00%	-\$101	-100.00%
5200	Travel and Conf	\$131	\$580	344.07%	\$0	-100.00%	-\$131	-100.00%
	Total 5000	\$131	\$580	344.07%	\$1,573	171.00%	\$1,442	1103.43%
7310	Direct Suppt Indt Costs	\$265	\$176	-33.39%	\$39	-77.80%	-\$225	-85.21%
	Total 7000	\$265	\$176	-33.39%	\$39	-77.80%	-\$225	-85.21%
	Total 1000-7000	\$4,043	\$2,693	-33.39%	\$2,171	-\$2	-\$1,873	-46.32%
8182	SPED Discr Grants	\$3,618	\$2,693	-25.56%	\$2,171	-19.41%	-\$1,448	-40.01%
8291	Othr Fed Rev-Def	\$425	\$0	-100.00%	\$0	0.00%	-\$425	-100.00%
	Total 8000	\$4,043	\$2,693	-33.39%	\$2,171	-19.41%	-\$1,873	-46.32%
	Balance	\$0	\$0	0.00%	\$0	0.00%	\$0	0.00%

This program has made an operational transition from certificated personnel in 2002-03 to classified personnel in the 2003-04, which allowed the county office to stay within the funding allocation.

Table 6: 3360 IDEA Low Incidence Entitlement

Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
2110	Regular Inst Aides	\$18,684	\$80	-99.57%	\$0	-100.00%	-\$18,684	-100.00%
2130	Part-time Inst Aides	\$0	\$12,188	100%	\$10,751	-11.79%	\$10,751	100%
	Total 2000	\$18,684	\$12,268	-34.34%	\$10,751	-12.36%	-\$7,933	-42.46%
3202	PERS-Class	\$541	\$1,275	135.82%	\$1,070	-16.09%	\$529	97.88%
3312	OASDI-Class	\$1,158	\$759	-34.45%	\$667	-12.21%	-\$492	-42.46%
3322	MEDICARE-Class	\$271	\$178	-34.46%	\$156	-12.21%	-\$115	-42.46%
3402	H & W-Class	\$6,985	\$4,234	-39.39%	\$0	-100.00%	-\$6,985	-100.00%
3502	State Unemp Ins-Class	\$34	\$61	81.91%	\$108	75.58%	\$74	219.40%
3602	Worker's Comp-Class	\$579	\$492	-15.09%	\$430	-12.55%	-\$149	-25.75%
	Total 3000	\$9,568	\$6,999	-26.85%	\$2,430	-65.28%	-\$7,138	-74.60%
4300	Materials and Supplies	\$0	\$114	100%	\$0	-100.00%	\$0	0.00%
	Total 4000	\$0	\$114	100%	\$0	-100.00%	\$0	0.00%
5200	Travel and Conference	\$0	\$0	0.00%	\$0	0.00%	\$0	0.00%
5800	Consult Serv/Ope Exp	\$0	\$1,083	100%	\$1,094	1.01%	\$1,094	100%
	Total 5000	\$0	\$1,083	100%	\$1,094	1.01%	\$1,094	100%
7310	Direct Suppt Indrt Csts	\$1,130	\$818	-27.62%	\$571	-30.21%	-\$559	-49.48%
	Total 7000	\$1,130	\$818	-27.62%	\$571	-30.21%	-\$559	-49.48%
	Total 1000-7000	\$29,382	\$21,281	-27.57%	\$14,846	-30.24%	-\$14,536	-49.47%
8182	SPED Discr Grants	\$29,382	\$833	-97.17%	\$0	-100.00%	-\$29,382	-100%
8590	Other State Revenue	\$0	\$20,445	100%	\$14,846	-27.39%	\$14,846	100%
	Total 8000	\$29,382	\$21,278	-27.58%	\$14,846	-30.23%	-\$14,536	-49.47%
	Balance	\$0	-\$3	-100%	\$0	100.00%	\$0	0.00%

This program experienced a 49.47% decrease in funding. The county office has made adjustments in personnel time and transitions from full time to part time instructional assistants to remain within the funding allocation. Significant savings have also been realized in employee benefits.

Table 7: 3385 IDEA Early Intervention Grant

Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
1110	Regular Teachers	\$31,208	\$32,387	3.78%	\$35,297	8.99%	\$4,089	13.10%
1160	Extra Duty Pay	\$2,275	\$2,904	27.66%	\$0	-100.00%	-\$2,275	-100.00%
1230	Part-time Pupil Suppt Sal	\$743	\$0	-100.00%	\$0	0.00%	-\$743	-100.00%
1260	Extra Duty Pupil Supt Sal	\$1,964	\$827	-57.87%	\$142	-82.83%	-\$1,822	-92.77%
	Total 1000	\$36,190	\$36,118	-0.20%	\$35,439	-1.88%	-\$750	-2.07%
2410	Reg Clerical and Off	\$2,109	\$0	-100.00%	\$0	0.00%	-\$2,109	-100.00%
2910	Regular Other Class	\$20,655	\$21,182	2.55%	\$19,151	-9.59%	-\$1,504	-7.28%
2920	Substitute Other Class	\$0	\$0	0.00%	\$3,452	100%	\$3,452	100%
	Total 2000	\$22,764	\$21,182	-6.95%	\$22,603	6.71%	-\$160	-0.70%
3101	STRS-Cert	\$2,980	\$2,985	0.19%	\$2,916	-2.32%	-\$63	-2.13%
3202	PERS-Class	\$618	\$2,048	231.14%	\$1,818	-11.21%	\$1,200	194.00%
3312	OASDI-Class	\$1,159	\$1,045	-9.84%	\$1,064	1.87%	-\$95	-8.16%
3321	MEDICARE-Cert	\$495	\$486	-1.72%	\$472	-2.98%	-\$23	-4.65%
3322	MEDICARE-Class	\$271	\$244	-9.85%	\$249	1.86%	-\$22	-8.18%
3401	Health & Welfare-Cert	\$2,911	\$2,911	0.00%	\$3,396	16.66%	\$485	16.66%
3402	Health & Welfare-Class	\$6,161	\$5,868	-4.76%	\$6,868	17.04%	\$707	11.47%
3501	State Unemp Ins-Cert	\$69	\$180	160.41%	\$298	65.61%	\$229	331.28%
3502	State Unemp Ins-Class	\$42	\$98	135.86%	\$190	93.87%	\$149	357.27%
3601	Worker's Comp-Cert	\$1,125	\$1,783	58.47%	\$1,418	-20.49%	\$292	26.00%
3602	Worker's Comp-Class	\$705	\$974	38.20%	\$904	-7.18%	\$199	28.27%
	Total 3000	\$16,535	\$18,622	12.62%	\$19,593	5.21%	\$3,057	18.49%
4300	Materials and Supplies	\$2,034	\$1,324	-34.91%	\$1,076	-18.73%	-\$958	-47.10%
	Total 4000	\$2,034	\$1,664	-18.23%	\$1,076	-35.31%	-\$958	-47.10%
5200	Travel and Conference	\$1,500	\$1,462	-2.53%	\$319	-78.20%	-\$1,181	-78.75%
5800	Consulting Serv/Op Exp	\$25	\$0	-100.00%	\$18	100.00%	-\$7	-28.28%
	Total 5000	\$1,525	\$1,462	-4.13%	\$337	-76.97%	-\$1,188	-77.92%
7310	Direct Support Indrt Costs	\$3,162	\$3,162	0.00%	\$3,162	0.00%	\$0	-100.00%
	Total 7000	\$3,162	\$3,162	0.00%	\$3,162	0.00%	\$0	-100.00%
	Total 1000-7000	\$82,210	\$82,210	0.00%	\$82,210	0.00%	\$0	0.00%
8182	SPED Discr Grants	\$82,210	\$82,210	0.00%	\$82,210	0.00%	\$0	-100.00%
	Total 8000	\$82,210	\$82,210	0.00%	\$82,210	0.00%	\$0	-100.00%
	Balance	\$0	\$0	0.00%	\$0	0.00%	\$0	0.00%

The county office has reduced personnel to remain within the funding allocation.

Table 8: 3405 SPED WorkAbility I

Object	Classification	Actual 2002-03	Actual 2003-04	% Inc/Dec	Actual 2004-05	% Inc/Dec	Inc/Decr 2002-05	% Inc/Dec
1120	Substitute Teachers	\$0	\$352	100%	\$0	-100.00%	\$0	0.00%
1930	Part-Time Other Cert	\$17,173	\$17,367	1.13%	\$18,647	7.37%	\$1,474	100.00%
	Total 1000	\$17,173	\$17,720	3.18%	\$18,647	5.23%	\$1,474	8.58%
2410	Reg Clerical and Office	\$2,109	\$369	-82.50%	\$2,146	481.64%	\$37	1.77%
2910	Regular Other Class	\$11,022	\$15,959	44.79%	\$19,148	19.98%	\$8,126	73.73%
2930	Part-Time Other Class	\$6,680	\$6,511	-2.53%	\$5,618	-13.71%	-\$1,062	-15.90%
2940	Student Help	\$20,900	\$20,498	-1.92%	\$19,444	-5.15%	-\$1,456	-107.49%
	Total 2000	\$40,710	\$43,337	6.45%	\$46,356	6.97%	\$5,646	13.87%
3101	STRS-Cert	\$91	\$22	-75.86%	\$0	-100.00%	-\$91	-100.00%
3201	PERS- Certificated	\$0	\$9	100%	\$0	-100.00%	\$0	0.00%
3202	PERS-Classified	\$322	\$1,619	402.26%	\$1,944	20.05%	\$1,621	502.96%
3311	OASDI-Cert	\$0	\$5	100%	\$0	-100.00%	\$0	0.00%
3312	OASDI-Class	\$2,306	\$2,456	6.51%	\$2,605	6.04%	\$299	12.95%
3321	MEDICARE-Cert	\$5	\$5	-2.11%	\$0	-100.00%	-\$5	-100.00%
3322	MEDICARE-Class	\$539	\$574	6.50%	\$609	6.05%	\$70	12.95%
3402	H & W-Class	\$5,585	\$5,917	5.94%	\$7,237	22.31%	\$1,652	29.58%
3501	State Unemp Ins-Cer	\$33	\$82	144.47%	\$152	86.50%	\$119	355.94%
3502	State Unemp Ins-Class	\$80	\$220	174.19%	\$384	74.91%	\$304	379.57%
3601	Worker's Comp-Cer	\$532	\$796	49.61%	\$746	-6.34%	\$214	40.13%
3602	Worker's Comp-Class	\$1,268	\$2,113	66.69%	\$1,854	-12.24%	\$587	46.29%
	Total 3000	\$10,762	\$13,819	28.40%	\$15,531	12.39%	\$4,769	44.31%
4200	Books Othr Than Texts	\$0	\$14,022	100%	\$0	-100.00%	\$0	0.00%
4300	Materials and Supplies	\$3,388	\$0	-100.00%	\$4,219	100%	\$831	24.51%
	Total 4000	\$3,388	\$14,022	313.87%	\$4,219	-69.91%	\$831	24.53%
5200	Travel and Conference	\$4,766	\$5,184	8.77%	\$4,960	-4.32%	\$194	4.07%
5900			\$98.00					
	Total 5000	\$4,766	\$5,282	10.82%	\$4,960	-6.09%	\$194	4.07%
7310	Direct Suppt Indrt Cts	\$5,376	\$6,593	22.63%	\$6,280	-4.74%	\$904	16.82%
	Total 7000	\$5,376	\$6,593	22.63%	\$6,280	-4.74%	\$904	16.82%
	Total 1000-7000	\$82,176	\$100,771	22.63%	\$95,993	-4.74%	\$13,817	16.81%
8182	SPED Discr Grants	\$82,176	\$16,152	-80.34%	\$0	-100.00%	-\$82,176	-100.00%
8590	Other State Revenue	\$0	\$84,619	100%	\$95,993	13.44%	\$95,993	0.00%
	Total 8000	\$82,176	\$100,771	22.63%	\$95,993	-4.74%	\$13,817	-85.61%
	Balance	\$0	\$0	0.00%	\$0	-100.00%	\$0	0.00%

This program experienced \$4,778, or 4.47%, reduction in funding from 2003-04 to 2004-05. To remain within the funding allocation, staff and student expenditures were reduced.

Appendix D: Study Agreement

**FISCAL CRISIS AND MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
June 29, 2006**

The FISCAL CRISIS AND MANAGEMENT ASSISTANCE TEAM (FCMAT), hereinafter referred to as the Team, and the Colusa County Office of Education, hereinafter referred to as the COE, mutually agree as follows:

1. BASIS OF AGREEMENT

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

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

The scope and objectives of this study are directly related to the Special Education programs operated by the Colusa County Office of Education. Based on the common interest of Colusa County SELPA Council, the scope of work for the study team has been defined to:

- 1) Conduct a review of the Special Education program staffing ratios.
- 2) Determine whether the Special Education budget is efficient and if the COE Special Education per pupil costs are excessive in relation to the State average. Provide recommendations to improve fiscal efficiency, as necessary.
- 3) Review the Special Education referral process and determine whether over identification is taking place. If so, provide recommendations for improving existing processes and additional or alternative procedures that may reduce over identification.
- 4) Review the role and responsibilities of site administrators in providing Special Education leadership, and provide recommendations for improvements as necessary.
- 5) Review the overall effectiveness and efficiency of the Special Education delivery system and provide recommendations for cost savings without violation of student rights.

B. Services and Products to be Provided

- 1) Orientation Meeting - The Team will conduct an orientation session at the COE to brief district superintendents and COE management and supervisory

personnel on the procedures of the Team and on the purpose and schedule of the study.

- 2) On-site Review - The Team will conduct an on-site review at the COE Special Education Office and Business Office and at district school sites if necessary.
- 3) Progress Reports - The Team will hold an exit meeting at the conclusion of the on-site review to inform the COE and district superintendents of significant findings and recommendations to that point.
- 4) Exit Letter - The Team will issue an exit letter approximately 10 days after the exit meeting detailing significant findings and recommendations to date and memorializing the topics discussed in the exit meeting.
- 5) Draft Reports - Sufficient copies of a preliminary draft report will be delivered to the district superintendents and COE administration for review and comment.
- 6) Final Report - Sufficient copies of the final study report will be delivered to the COE following completion of the review.

3. PROJECT PERSONNEL

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

- A. Dr. William Gillaspie, FCMAT Management Analyst
- B. William Puddy, FCMAT Special Education Consultant
- C. Kay Atchison, FCMAT Special Education Consultant

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

4. PROJECT COSTS

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

- A. \$400.00 per day for each Team Member while on site, conducting fieldwork at other locations, presenting reports, or participating in meetings. The FCMAT board recently approved the rate of \$500 per day for work conducted in the 2006-07 fiscal year. FCMAT will honor the original quoted rate of \$400 per day for the current scope of work included in this agreement. The impact of further revisions to the scope, if any, will be billed at the 2006-07 daily rate.

- B. All out-of-pocket expenses, including travel, meals, lodging, etc. Based on the scope of work identified in section 2 A, total cost of the review is \$8,500.
- C. The COE will be invoiced at actual costs, with 50% due following the completion of the on-site review and the remaining 50% due upon acceptance of the final report by the District.

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

5. RESPONSIBILITIES OF THE COE

- A. The COE will provide office and conference room space while on-site reviews are in progress.
- B. The COE 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 superintendents and COE 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 COE pupils. The COE shall take appropriate steps to comply with EC 45125.1(c).

6. PROJECT SCHEDULE

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

Orientation:	July 18, 2006 @ 8:30 a.m.
Staff Interviews:	July 18-19, 2006
Exit Interviews:	July 19, 2006
Preliminary Report Submitted:	August 31, 2006
Final Report Submitted:	To be determined
Board Presentation:	To be determined

7. CONTACT PERSON

Please print name of contact person: _____
Kay Spurgeon, Superintendent

Telephone 530-458-0350 x10365 FAX 530-458-8054

Internet Address kspurgeon@ccoe.net

Kay Spurgeon 7/10/06

Kay C. Spurgeon, Superintendent
Colusa County Office of Education
Date

Barbara Dean June 29, 2006

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

Indicate number of copies of reported needed: Five (5)