



CSIS *California School Information Services*

Corning Union Elementary School District

Special Education and Administrative Structure Review

May 1, 2012

Joel D. Montero
Chief Executive Officer





CSIS California School Information Services

May 1, 2012

Catherine Reimer, Ed.D., Superintendent
Corning Union Elementary School District
1590 South Street
Corning, CA 96021

Dear Superintendent Reimer,

In October, 2011 the Corning Union Elementary School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for a review of the district's special education programs and services. Specifically, the agreement stated that FCMAT would perform the following:

1. Conduct a comprehensive review of the special education delivery system.
2. Review the leadership/oversight responsibilities of special education and curriculum and instruction.
3. Review caseloads regarding all certificated special education staff in relationship to effectiveness of staffing.
4. Conduct an evaluation of the student study team process.
5. Review the IEP process, documentation process and the effectiveness of follow up procedures.
6. Review one-to-one aide requests and staffing.
7. Review district office administrative staffing and make recommendations for effectiveness.

This final report contains the study team's findings and recommendations in the above areas of review.

On behalf of FCMAT, we appreciate the opportunity to serve the district and extend thanks to all the staff of the Corning Union Elementary School District for their cooperation and assistance during fieldwork.

Sincerely,



Joel D. Montero
Chief Executive Officer

FCMAT

Joel D. Montero, Chief Executive Officer

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Table of Contents

About FCMAT	iii
Introduction	1
Background	1
Study Guidelines	2
Study Team	2
Executive Summary	3
Findings and Recommendations	5
Special Education Program and Service Delivery	5
Staffing and Caseloads	10
Student Study Teams	11
IEP Process	13
One-to-One Aides	15
Administrative Staffing and Leadership Structure	19
Certificated Leadership	19
Classified Staffing structure	23
Appendix	25

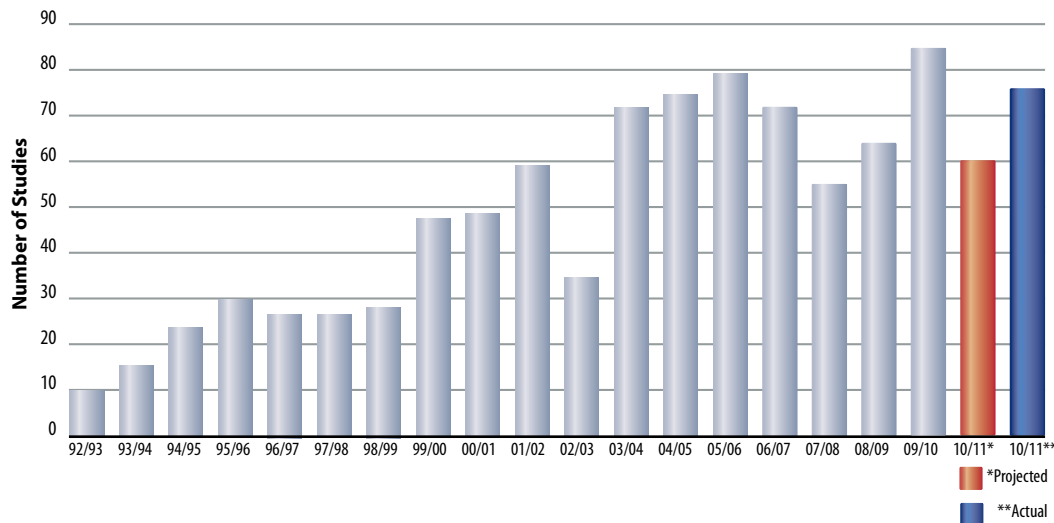
About FCMAT

FCMAT's primary mission is to assist California's local K-14 educational agencies to identify, prevent, and resolve financial and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related school business and data services. FCMAT's fiscal and management assistance services are used not just to help avert fiscal crisis, but to promote sound financial practices and efficient operations. FCMAT's data management services are used to help local educational agencies (LEAs) meet state reporting responsibilities, improve data quality, and share information.

FCMAT may be requested to provide fiscal crisis or management assistance by a school district, charter school, community college, county office of education, the state Superintendent of Public Instruction, or the Legislature.

When a request or assignment is received, FCMAT assembles a study team that works closely with the local education agency to define the scope of work, conduct on-site fieldwork and provide a written report with findings and recommendations to help resolve issues, overcome challenges and plan for the future.

Studies by Fiscal Year



FCMAT also develops and provides numerous publications, software tools, workshops and professional development opportunities to help local educational agencies operate more effectively and fulfill their fiscal oversight and data management responsibilities. The California School Information Services (CSIS) arm of FCMAT assists the California Department of Education with the implementation of the California Longitudinal Pupil Achievement Data System (CALPADS) and also maintains DataGate, the FCMAT/CSIS software LEAs use for CSIS services. FCMAT was created by Assembly Bill 1200 in 1992 to assist LEAs to meet and sustain their financial obligations. Assembly Bill 107 in 1997 charged FCMAT with responsibility for CSIS and its statewide data management work. Assembly Bill 1115 in 1999 codified CSIS' mission.

AB 1200 is also a statewide plan for county office of education and school districts to work together locally to improve fiscal procedures and accountability standards. Assembly Bill 2756 (2004) provides specific responsibilities to FCMAT with regard to districts that have received emergency state loans.

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

Since 1992, FCMAT has been engaged to perform nearly 850 reviews for LEAs, including school districts, county offices of education, charter schools and community colleges. The Kern County Superintendent of Schools is the administrative agent for FCMAT. The team is led by 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.

Introduction

Background

The Corning Union Elementary School District serves 1,933 students in grades K-8 at four elementary schools and one middle school. The district continues to increase program support of its schools to benefit students and exit Program Improvement status. An unrestricted general fund contribution to special education equal to 32% of the special education budget and a special education identification rate that exceeds the statewide average are areas of concern for the district.

This FCMAT study was requested to review the efficiency of administrative office staffing and design and to provide recommendations for improvement, particularly in several areas in which special education costs can have a significant fiscal impact.

In October 2011 the district requested that FCMAT assist the district by reviewing the district's special education programs and services, and its administrative staffing structure.

The study agreement specifies that FCMAT will perform the following:

1. Conduct a comprehensive review of the special education delivery system.
2. Review the leadership/oversight responsibilities of special education and curriculum and instruction.
3. Review caseloads regarding all certificated special education staff in relationship to effectiveness of staffing.
4. Conduct an evaluation of the student study team process.
5. Review the IEP process, documentation process and the effectiveness of follow up procedures.
6. Review one-to-one aide requests and staffing.
7. Review district office administrative staffing and make recommendations for effectiveness.

Study Guidelines

FCMAT visited the district on January 23-25, 2012 to conduct interviews, collect data and review documents. This report is the result of those activities and is divided into the following sections:

- I. Executive Summary
- II. Special Education Program and Service Delivery
- III. Staffing and Caseloads
- IV. Student Study Teams
- IV. IEP Process
- V. One-to-one Instructional Aides
- VI. Administrative Staffing and Leadership Structure

Study Team

The study team was composed of the following members:

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*As a member of this study team, this consultant was not representing her employer but was working solely as an independent contractor for FCMAT.

Executive Summary

The Corning Union Elementary School District provides a full range of services to students with disabilities, in coordination with the Tehama County Office of Education and the Tehama County Special Education Local Plan Area (SELPA). This is the most cost effective way for a district of this size to provide these needed services.

Some special education students are not receiving services in the least restrictive environment, due largely to a lack of consistency in program delivery. Although the district provides pull-out services to special education students, it should consider using a learning center model to provide greater access to the least restrictive environment. The Tehama County SELPA is available to assist the district in developing this model, which is used effectively by other districts within the SELPA.

Special education teachers have access to the core curriculum; however, there is little opportunity for district oversight to ensure consistent delivery and methods of instruction.

The district has identified 12.3% (293) of its K-8 students as eligible for special education services. This exceeds the statewide average identification rate of 10%, which in the district's case would mean 249 students. This is a significant numerical and percentage difference from the average and may indicate that overidentification is occurring. The district has not gathered data to determine the reasons for its higher than average identification rate. Reviewing exit rates, the ratio of referral to identification, rates of identification at individual schools, and the extent to which Response to Intervention is being implemented would help the district better monitor and possibly reduce its identification rate.

FCMAT's review of the district's development and implementation of individualized education programs (IEPs) revealed inconsistencies in implementation and follow-up. The district has the ability to provide school site administrators with access to a variety of reports about students' IEPs; however, this information is not available to administrators.

The district has concerns about being in the third year of Program Improvement status (a status defined under the federal Elementary and Secondary Education Act that requires improvement and corrective actions from a district that receives Title I funds and has not made adequate academic progress in the same academic subject or subjects for two consecutive years) and strives to create initiatives to improve in this area. However, the district's certificated and administrative staffing and organizational structure does not provide the required focus on educational programs, interventions and curriculum.

A comparison with districts of comparable size revealed that every comparison district has an assistant superintendent or equivalent position that is responsible for curriculum and instruction; Corning Union Elementary was the only school district among those compared that lacks such a position. In addition, Corning is the only district in the comparison that does not have a certificated employee supervising its human resources functions. The district has the capacity to restructure its central office administration to better support program improvement initiatives using existing resources.

There is a lack of consistency in salary schedules and job requirements for classified positions at the district office. Aligning job requirements and salary schedules with established criteria in a manner similar to how the salary schedule for certificated staff is structured would create more consistency and continuity.

Findings and Recommendations

Special Education Program and Service Delivery

The Individuals with Disabilities Education Act (IDEA) requires schools to provide each disabled student with a free and appropriate public education (FAPE) (Title 34, Code of Federal Regulations, 300.17). FAPE is defined as an educational program that is individualized to a specific child, designed to meet his or her unique needs and provide educational benefit. The requirement that students be served in the least restrictive environment (LRE) ensures that handicapped students are educated with students who are not handicapped whenever possible. IDEA prohibits the removal of any student from the general education setting unless the severity of their handicap prevents them from being educated satisfactorily using supplementary aids and services. The legislation does permit a student to be placed outside of the general education program to ensure that the student's individualized educational program (IEP) can be implemented; therefore, a district has discretion regarding how best to serve its special education students. Districts are also required to provide students with access to a full range of services (Title 34 Federal Register 300.115, 30 and Education Code 56361).

FCMAT reviewed the program and service options available to the district's special education students, particularly in two areas that are closely related to FAPE: whether the district provides its students with the least restrictive environment, and whether students have access to a full range of services.

Range of Services

The district makes a full range of services available to its special education students, offering programs for students with all types of disabilities through its special education classes, additional programs and services provided by the Tehama County Office of Education (county office), and as needed in nonpublic schools.

The district's special education students are served by the county office in preschool programs, in a class for students with moderate to severe disabilities, and by designated instruction staff in the areas of speech, occupational therapy, adaptive physical education, and services for the deaf and hard of hearing, visually impaired and orthopedically impaired. These services are provided by the county office through the Tehama County Special Education Local Plan Area (SELPA). The district reports that the cost for these services is less than what it would cost the district to employ staff to provide them. The county office also provides the district with behavior aides under a separate billing model, and FCMAT verified with the district's chief business official (CBO) the fact that these are also cost-effective.

The district's special education coordinator is usually informed of any request for a student to receive county office-provided itinerant services or attend a county office-operated special education program; however, preschool referrals are generated directly by county office staff and do not come to the attention of the coordinator. This has not been a problem to date because the number of students served is relatively low and the costs for the services are reasonable.

However, this also means that no district employee is monitoring these referrals. The county office notifies the district's special education coordinator of IEPs for students the county office serves, but the coordinator is the only district employee who has access to these students' IEPs through the computerized special education information system (SEIS). These students' IEPs

are not regularly reviewed, and the coordinator is not involved in IEP planning unless there are specific problems with a student's placement or a student is being returned to a district-operated program.

Because costs for students served in county office-operated programs have not been excessive, there has not been a perceived need for more careful monitoring. However, if the cost calculation formula for county office services changes or the number of the district's students in county office programs rises significantly, more careful monitoring will be needed.

One district special education class is considered a SELPA regional class, and students from outside the district can attend that class if it is not full. To attend a regional class, a student must be referred to the Tehama County SELPA committee. According to the SELPA, the district's regional class has no students from outside the district because the class is full, with 12 students. If students from outside the district were to attend the class, the district would be compensated for costs according to the SELPA's local plan and allocation model.

Least Restrictive Environment

The district offers special education services using a traditional resource specialist (RS) and special day class (SDC) model, and both of these programs are available at its middle school, but not at all of its elementary schools.

One small elementary school does not have any special education classes, so its special education students must attend another elementary school. Another elementary school has two SDCs but no RS program, and two other elementary schools have RS programs but no SDCs. As a result, any special education students with an IEP that requires a level of service not available at their school must be transported to another elementary school. In these cases the students are not receiving services in the least restrictive environment.

Two of the district's classes have the title of small group instruction (SGI) but differ from the RS and SDC classes only in the number of students that the teacher can serve.

The middle school RS program is operated slightly differently from a traditional pull-out RS program because several students are receiving their instruction in the general education class with the support of a resource classroom aide. The teacher still provides separate classes for students who need more intensive instruction as well as pull-out classes for special education students in the general education classes who require additional support. These students may be in the least restrictive environment, but students in the SDCs are not included in this model.

Staff expressed concerns regarding the district's special education delivery model. At the elementary school that has two SDCs, it is often difficult to mainstream students because of the limited number of general education teachers at a grade level and the higher than average number of special education SDC students. Staff reported that the school attempts to mainstream students, but this is not always possible.

Staff indicated that when some parents are presented with a change in their child's special education placement during the school year they refuse the IEP because they do not want their child moved to another school. In these cases, although the student's current school does not have the services recommended by the IEP, every attempt is made to meet the student's needs.

The district has considered using the learning center model to provide special education instruction, including evaluating how a learning center can be integrated into a Response to Intervention (RtI) program (a learning intervention model designed to provide early, consistent help and monitoring of progress for students who are having difficulty learning). Some staff from

at least one school have visited nearby programs. Staff indicated that there are successful learning center programs in several other districts within the SELPA, and that the SELPA would be able to help the district develop a learning center model if the district decides to do so.

Although special education staff have had some introduction to learning centers, both special education and general education staff would need training before this type of program is initiated. Special education staff indicated that their main concern regarding a learning center model is the caseload limit for resource specialists. In most districts that operate learning centers, the titles of resource specialist and special day class teacher are eliminated and replaced with another title such as a specialized academic instructor. The Code of Federal Regulations Title 34, Part 300.26(b) (3) defines specialized academic instruction as follows:

. . . adapting, as appropriate to the needs of the child with a disability the content, methodology, or delivery of instruction to ensure access of the child to the general curriculum so that he or she can meet the educational standards within the jurisdiction of the public agency that apply to all children.

Defining the special education program as specialized academic instruction and the staff as specialized academic instructors may better indicate a program based on the least restrictive environment requirement. Caseload is an important factor in the success of a learning center model, but the statutory caseload limit of 28 for a resource specialist would no longer apply under this model.

Students can be assigned to a learning center from a few minutes a week to the majority of their day. Students can also use the learning center to receive re-teaching or homework support. Staff other than special education staff can provide instruction in the learning center to all students, and special education staff can provide short-term intervention instruction to students not identified as special education students. This provides flexibility for the majority of special education students to receive the level of special education support they need at their own school and in the least restrictive environment. This model could be implemented without increasing the number of staff.

Although the middle school provides support for some special education students in its general education classes, the resource and SDC programs are separate and there is no blending between the special education classes. Providing sufficient staff to support special education students in general education classes can be difficult. Implementing a learning center model at the middle school that takes into account the more significant needs of some SDC students would allow aides to provide more support for all special education students in general education classes.

Because it is very small, Rancho Tehama Elementary School is the only school that would likely not see any change in special education under a learning center model. Because it is allowable if designated by an IEP and because providing the support students would need at a very small school is not practical, the district could continue transporting special education students from Rancho Tehama to another elementary school.

Organization and Oversight

The district's special education teachers and support staff do not have regularly scheduled meetings to learn of changes in laws or regulations, to review district policies and procedures, or to articulate curriculum. The special education coordinator distributes information to staff via e-mail or by visiting the schools.

Staff reported that special education teachers have access to the core curriculum, but there is no oversight to ensure that teachers are using the core curriculum. In several cases staff reported that teachers are using a variety of materials and programs that they have used for several years rather than the core curriculum materials. This may be appropriate because supplemental materials may be needed for a particular student, but without district-level monitoring there is no way of knowing whether this is the case.

School administrators are responsible for evaluating special education teachers and aides, and they attend IEP meetings at their school. The SELPA has provided a detailed procedures manual for special education that is available online through the special education information system (SEIS) library. However, the district's school administrators lack access to SEIS and thus to the manual. A hard copy of the manual was provided to the district, but this has also not been distributed to administrators.

Recommendations:

The district should:

1. Continue to have the county office provide special education services to its preschool students and designated instruction services (DIS) to its itinerant students, students who are visually impaired, deaf or hard of hearing, and students with moderate to severe disabilities until the number of students with these needs warrants hiring district staff.
2. Continue to monitor the cost of county office-operated programs and services to ensure that it is using the most cost-effective provider.
3. Develop a system to ensure that the IEPs for its students who are served outside of the district are monitored for accuracy, for educational benefit, and to determine if the IEP could be implemented in a district-operated program.
4. Begin converting its current special education model to one that has the elements of a learning center model by doing the following:
 - a. Contact the Tehama County SELPA for assistance.
 - b. Provide special education teachers, general education teachers and administrators with training in the learning center model.
 - c. Visit local learning centers.
 - d. Change the designation of special education staff from resource specialist and special day class teachers to specialized academic instruction teachers.
 - e. Review all aide assignments with special education teachers and site administrators to determine how to assign existing aides to support learning centers.
5. Hold meetings with parents to explain how learning centers will be operated and how they will meet special education students' needs.

6. Hold IEP meetings to update students' IEPs with any changes in school of attendance or time spent in the special education program. Most IEPs should not need significant changes.
7. Develop a meeting schedule for special education teachers and support staff so that information can be provided to all staff at the same time and so that staff can have input regarding special education curriculum development, policies and procedures.
8. Ensure that all special education teachers have access to the core curriculum and that any supplemental materials used are research-based and appropriate.
9. Ensure that all school administrators have training and special education procedures manuals to assist them during IEP meetings and employee evaluations.

Staffing and Caseloads

Staffing and caseloads are defined in both the California Education Code or through statewide practice and are frequently affected by the rate of identification of students with disabilities. When a district exceeds the statewide average identification rate, more staff are needed to provide mandated levels of service.

The district has identified 12.3% (293) of its students in grades K-8 as eligible for special education services. This exceeds the statewide average of 10%, which in the district's case would be 249 students. This is a significant numerical and percentage increase and may indicate that the district is overidentifying students for special education. The district is not aware of the reasons for its higher than average identification rate; it has not gathered or reviewed data on exit rates, the ratio of referrals to identifications, rates of identification at individual schools, or implementation of RtI. It would benefit the district to develop a districtwide baseline in each of these areas and a system to regularly monitor and review identification rates.

The average size of the district's SDCs for students with mild to moderate disabilities is between 12 and 15 students, which is within the range established by School Services of California, Inc., which is the industry standard. Resource specialists' caseloads are consistent with the requirements of Education Code section 56362(6) (c).

Recommendations:

The district should:

1. Develop procedures at the district level to monitor special education referral, identification and exit rates monthly, including identification rates by school site.
2. Carefully analyze the causes of overidentification and help schools implement intervention strategies and programs for students.
3. Set a goal, with the involvement of school principals and the superintendent, to ensure that its identification rate for special education is aligned with the statewide average.
4. Work closely with any school sites that have disproportionately high rates of identification.

Student Study Teams

A Student Study Team (SST) or Study Success Team (SST) is a school-based problem-solving group the purpose of which is to assist teachers in instruction, curriculum, classroom management and behavior management. SSTs organize the resources available at a school site into a system for identifying and solving the problems encountered when students do not progress at a satisfactory rate or demonstrate behavioral challenges in the general education environment. In many California schools, student study teams are considered the gatekeepers for special education assessments.

Effective SSTs do the following:

- Identify students who need additional support.
- Help teachers solve problems by using the collective expertise of other teachers and professionals.
- Help parents when they have concerns.
- Improve communication between staff members and between the school and the home.
- Increase staff commitment to students and the educational program.
- Facilitate referrals to other general education programs at the school site.
- Coordinate the services that a student receives.
- Document the use of scientific interventions and peer-reviewed research.
- Document all reasonable interventions before referring a student for special education assessment.
- Ensure that students who are English language learners are not inappropriately referred for special education assessment.

Staff reported that the majority of work by SSTs at the district's schools does not involve special education assessment but is focused on determining if there are interventions or accommodations that a student needs to benefit educationally without special education.

Each school has a written SST process and forms that a teacher is required to complete before accessing the SST. However, there is a lack of consistency in the focus of the SSTs, the data required to present a student and the types of interventions used. The district had intervention specialists and/or Reading First coaches in the past, but it no longer has these staff members. As a result, many of the interventions ceased. The district has recently reinstated the intervention specialist positions, which provides an opportunity to redefine the support role for this group and create some districtwide consistency in the SST process.

Although RtI was not an area of inquiry in this study, there is a strong connection between RtI and how SSTs function: when a school district has a strong RtI program, the SST (or its equivalent; sometimes this entity has a different title) focuses on student data from the tiered interventions.

The district has offered employees some training in RtI and provided FCMAT with a PowerPoint presentation that was given to staff. In addition, several handouts from the district and schools indicate that the school sites are aware of the RtI process and had been attempting to implement various tiered interventions including Reading First, before-school tutoring, and block courses at the middle school. As indicated earlier, some of these interventions were discontinued when staff

were no longer available to provide them. However, staff reported that even when intervention programs were in place they were not implemented consistently from school to school.

The district's supervisor of curriculum position, which in many districts would be responsible for SSTs and RtI, is currently a part-time position and has had to focus on state adoptions, textbook purchases and the identification of essential standards. Therefore, the district has no district-level staff member to monitor SST consistency, rates of referrals to special education or how RtI is being implemented at each school.

Recommendations:

The district should:

1. Review the SST process with all school site administrators, make changes as needed, then train all certificated staff at the schools in the same process.
2. Ensure that the districtwide SST process contains consistent documentation, including the following:
 - a. The levels of RtI operating at the schools.
 - b. The data collected through RtI and other districtwide assessments.
 - c. The criteria for referring a student for a special education assessment.
3. Ensure that data is collected from all schools to determine the effectiveness of the SST process, including the following:
 - a. The number of students discussed at SSTs.
 - b. The number of students assessed for special education.
 - c. The number of students found eligible for special education as a result of assessment.
 - d. The number of English learner students referred for special education assessment.
 - e. The number of English learner students found eligible for special education.
4. Assign a district-level employee the responsibility for SSTs, including monitoring of data to determine the percentage of referrals to special education from the SSTs.
5. Assign a district-level employee the responsibility for RtI to ensure that appropriate interventions, data collection and monitoring are being implemented at each school.
6. Develop a process to provide all new staff and administrators with SST training.

IEP Process

FCMAT reviewed the district's IEP process, including the documentation process and the effectiveness of follow-up procedures. The district uses the Special Education Information System (SEIS), which is a computerized IEP management system with forms that are updated regularly and meet all federal and state statutory requirements. The SEIS is designed to ensure that all required items are entered on a student's IEP. The system can also generate a variety of reports regarding IEP timelines, disabilities, caseloads and other information for staff and administrators. This system is used by the majority of school districts in California.

Using the SEIS ensures that all required items for the California Special Education Management Information System (CASEMIS) are captured on each IEP, and that the special education staff are kept aware of timelines for initial assessments, annual meetings, and triennial assessments and meetings. The system collects and, through the SELPA, submits information to CASEMIS regarding IEPs that are overdue, special education services on the IEP, exit data, eligibility status and other items. CASEMIS has not identified any problems in the district in these areas; therefore, this aspect of the IEP process and documentation seems to be satisfactory.

However, FCMAT found inconsistencies in follow-up and implementation of IEPs. The SEIS does not verify the accuracy of information on an IEP, nor does it determine if a special education student was eligible for special education or was assessed in all areas of suspected disability. The system is also unable to determine whether an IEP was designed for education progress as a result of the services provided, whether students have access to core curriculum, or whether they are receiving the services included on the IEP. In many districts, these items are reviewed by district special education staff in conjunction with school administrators; however, in Corning UESD, as indicated earlier in this report, SEIS reports are not being generated regularly by any district employee.

Only the district's special education providers and psychologists have access to the SEIS. Unlike many other districts, the district does not provide its school administrators with read-only access to the SEIS system's information regarding students at their school. Providing this level of access would enable administrators to monitor when IEPs are due or overdue, review IEPs on their computer whenever needed rather than having to access a student's confidential special education file, and generate reports regarding the students at their school. Read-only access would also enable school administrators to access the SEIS library and the SELPA procedures manual. Allowing both district- and school-level review of IEPs would greatly improve the ability to follow up on each IEP.

The district is participating in a special education self-review (SESR), which consists of analyzing the contents of IEPs for three consecutive years and comparing the needs, current performance, goals, services and outcomes for each year to determine if a student's program was calculated to result in educational benefit. When the SESR is completed, the district is provided with specific corrective actions based on the information included in the SESR system. Corrective actions are required for every item found to be out of compliance on each IEP, and systemic corrective actions are required if a problem is found on a specific percentage of the IEPs. After completing the SESR, the district will have a clear indication of the steps needed to maintain compliance and implement appropriate follow-up for each IEP.

Because the district's school administrators evaluate special education staff and attend IEP meetings for students at their school, it is important that they receive adequate training regarding special education instruction and regulations. The school site is the first and most important

factor in monitoring whether IEPs are being followed and whether the students are receiving educational benefit. The district's training and support in the area of special education is limited, and as a result school administrators report that they are relying on their own experience and the expertise of their special education teachers.

Recommendations

The district should:

1. Continue using the SEIS to ensure that the IEP documents adhere to statutory requirements.
2. Develop a system for randomly checking to ensure that IEPs are accurate and designed to provide educational benefit.
3. Develop a process for regularly generating reports from the SEIS to enable special education teachers, school administrators and district administrators to accurately monitor special education caseloads and services.
4. Develop a system to ensure that services listed on the IEP are being delivered.
5. After completing the SESR, develop a comprehensive plan for implementing any corrective actions and continued monitoring of all IEPs.
6. Provide school administrators with read-only access to the SEIS and its IEP data as needed, including the ability to generate reports.

One-to-One Instructional Aides

The number of California school districts using one-to-one aides has increased dramatically over the past few years. This has strained special education budgets and increased contributions from the unrestricted general fund, especially when the services are not warranted or are not monitored to contain costs.

The only way for a district to determine if these services are appropriate is to establish and implement guidelines, policies and procedures, including strict monitoring, to prevent services from being granted unnecessarily. The district does not have these elements in place.

Procedural guidelines can help a district determine if the need for additional aide support is justified based on students' needs. Effective guidelines can help a district determine: the need for additional aides; dependence factors; alternatives to the use of aides; whether existing resources are being used optimally; whether there is an ongoing need for such services; and when to increase or decrease aide hours.

The district's IEPs that provide for additional support for a student do not include transition plans for the eventual fading of that support and a goal of student independence. It is a best practice to ensure that IEPs that include this additional support also include goals for independence and transitioning away from aide services. In most cases a transition plan for phasing out the aide support (known as a fading) is included in the IEP along with the goals. This ensures that the staff, the student's family and the student are working toward the same goal of independence and student success.

Staff indicated that although the district's one-to-one aides are frequently reminded that their job is to build students' independence and lessen the need for one-to-one support, this rarely occurs. The term "one-to-one aide" is no longer used in many California school districts; it has been replaced with terms such as "special circumstances aide" and "additional classroom support aide." This change has been made to help eliminate the impression that an adult is assigned to work solely with one student or that the assignment is permanent.

The Tehama County SELPA has provided all of its school districts with sample procedures for special circumstance aides (one-to-one aides), including several different forms for an IEP team to complete before requesting an aide. These forms require specific information about why the student needs additional support; the activities and times for which the support is needed; and the staff in the classroom and at the school site that are available to provide that support, including general education teachers and students. The objective of these forms is to ensure that the student is as independent as possible while the additional support is being provided and that student independence is the goal of the additional support. The district is not using these forms.

Staff reported that almost no training is provided to one-to-one aides before they start their assignments. If an aide starts at the beginning of the school year, the special education teacher tries to meet with them, but this is not always possible. Staff indicated that in several cases the one-to-one aides had not seen their student's IEP, were not sure of the goals, and were learning how to work with their students on their own.

In the district, close monitoring of the interaction and instruction provided by one-to-one aides in general education classes is left primarily to the general education teacher; the special education teacher at the school site is involved only secondarily. The general education teacher may not have had training in working with a particular student and therefore often leaves the instruction to the aide. Special education teachers typically have full caseloads and may only occasionally get to see a student and aide in an academic setting. Special education teachers also have limited time

to work with one-to-one aides in their special education classes, but are responsible for and can better monitor how the aides interact and instruct a student in that setting.

All of the district's classroom and one-to-one aides are assigned by the special education coordinator. In most cases one-to-one aides stay with their respective students for several years. As staff reported, this fosters a close relationship between the aide, the student and the family; however, it can also lead to more dependence rather than independence and, because the aide is familiar with the student, a perception that training for the aide is not necessary.

The district has a total of 21 aides. Eight of these are classroom aides for seven teachers. Two of the eight are four-hour per day aides and six are six-hour per day aides. The remaining 13 aides are one-to-one aides assigned as follows: seven to autistic students, one to an emotionally disturbed student, four to physically impaired students, and one to an intellectually disabled student. Five of these aides are assigned to one classroom that is considered an SDC. This class sometimes has seven or eight adults in a class with 18 students. Thus one-to-one aides account for 62% of the district's instructional assistant assignments, which is a high percentage. The district could increase efficiency by reviewing each of these assignments using the special circumstance aide guidelines.

Recommendations

The district should:

1. Implement a written process for determining the initial need for a special circumstances aide; consider using the process provided by the Tehama County SELPA. Ensure that the process includes the following:
 - a. Determine when and where instructional aide support already exists.
 - b. Determine when and where additional supports are needed based on the student's goals.
 - c. Ensure that the student's IEP includes goals for independence.
 - d. Ensure that the student's IEP includes a transition plan for fading the additional support.
 - e. Ensure that the student's IEP contains a timeline that includes a review of additional support at the next annual review or before the next school year.
2. Consider changing the title of one-to-one aide to a title such as special circumstance aide or additional classroom support aide.
3. Provide special education teachers with training as needed regarding how to write goals that address the role of additional support in developing independence and providing for fading.
4. Provide training and instruction annually to each aide regarding the goals on a student's IEP and the provision of both behavioral and academic support.
5. Ensure that each aide is assigned to work with other students during the school day so that dependence on one aide is not fostered.

6. Regularly observe each special circumstances aide in order to provide them with the support and training they need to work effectively with both their assigned student and other students in the class.
7. Continue to ensure that an aide is assigned to other students or duties when a student who receives additional aide support is absent.

Administrative Staffing and Leadership Structure

Certificated Leadership

The effectiveness of any school district office is best measured by the level of support it offers to a district's educational programs. The district has concerns about the fact that it is in the third year of Program Improvement, and it is focused on initiatives to improve in this area.

The district office operations include human resources; payroll and employee benefits; accounts payable and receivable; budgeting and finance; data and technology services; and supervision of food service, maintenance and transportation. Certificated administration at the district level consists solely of the superintendent. All other certificated administrative roles, including textbook adoptions, curriculum, English language learners, School Attendance Review Board (SARB) and community day school, are supervised by school principals, who receive annual stipends to perform these additional duties. The total annual cost of these stipends is approximately \$30,000.

The district's special education programs and services are supervised by a school psychologist who has been reassigned as the special education coordinator for half of the time, or 0.5 of a full-time equivalent (FTE). Unlike other districts across the state, the district's special education coordinator position does not require an administrative credential. The district also contracts with the county office for the preparation and filing of the Consolidated Application (ConApp) at a cost of \$7,500 per year.

FCMAT interviewed district office staff, the superintendent, the CBO and a board member to ascertain the level of effectiveness within the office. The district office staff is a close-knit group of employees who communicate freely. The CBO is the leader for most of the office's operations and functions and has earned the respect of the support staff.

A review of the district office conducted by FCMAT in 2005 contained a recommendation that the human resources and payroll functions be separated to allow for better internal controls, and the district has since done so; however, there remains a need to better align human resources department duties to provide more support for the district's educational programs.

The district's human resources department is not supervised by a certificated employee. The human resources director is not responsible for reporting data to California School Information Services (CSIS) or the California Basic Educational Data System (CBEDS). It would benefit the district to assign these responsibilities to the human resources director.

The school principals' additional duties for which they receive stipends leave them with little time to complete evaluations. In addition, the district's special education coordinator does not have an administrative credential and thus cannot evaluate teachers. Regular and consistent evaluations of teachers can help administrators become familiar with classroom practices and direct staff development activities to improve student learning.

FCMAT compared the administrative structure of Corning Union Elementary School District with those of four districts of similar size. In contrast to Corning UESD, one of the four comparison districts has an assistant superintendent of human resources position, which is a certificated position, and three of the comparison districts have a certificated assistant superintendent and/or director position at the district administrative level that is focused on curriculum and instruction.

Comparison of administrative and leadership structure with similar districts

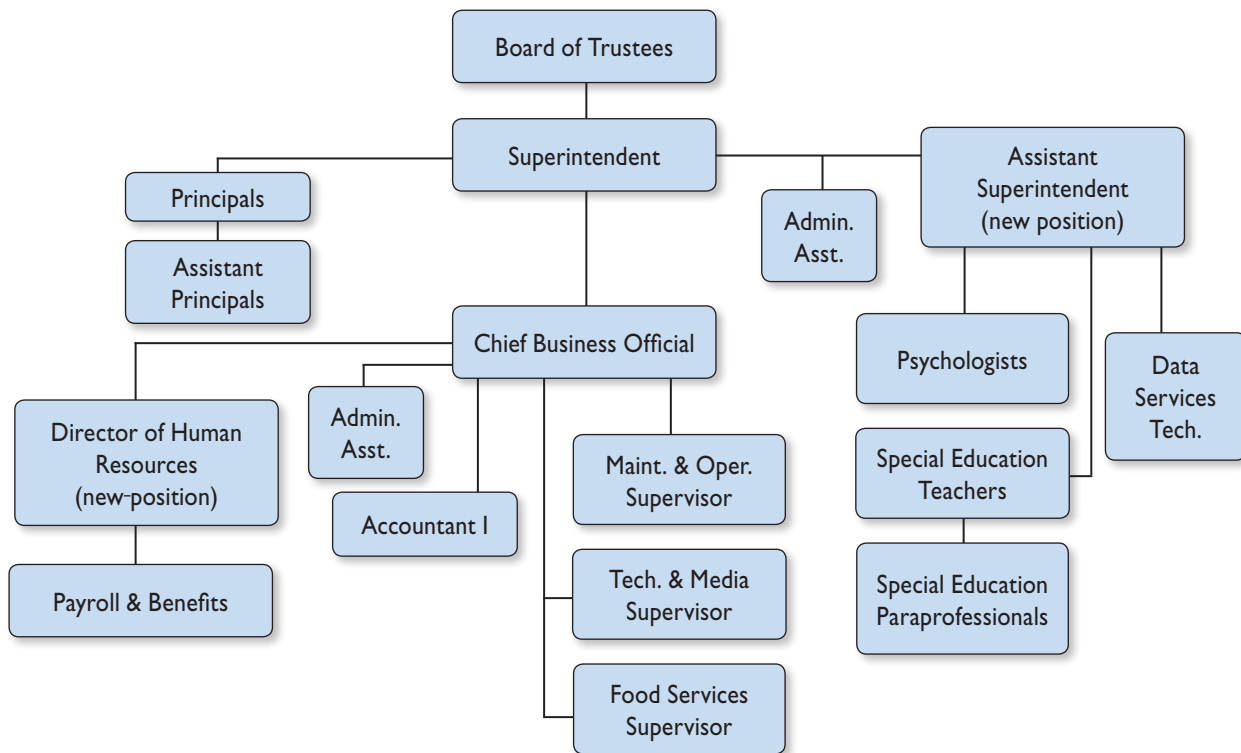
District	Enrollment	Superintendent	Human Resources	Business Services	Curriculum & Instruction	Special Education	Technology
Center Joint Unified Elementary (Sacramento County)	5,081	I	Assistant Superintendent	Assistant Superintendent	Director	w/HR Asst. Supt.	w/HR Asst. Supt.
Corning Union Elementary (Tehama County)	1,933	I	Coordinator	CBO	None	.5 FTE Psychologist	.Technology Coordinator (45 FTE)
Soquel Union Elementary (Santa Cruz County)	1,879	I w/(HR Certificated)	None	Asst. Supt. (HR Classified)	None	Director	Coordinator
Red Bluff Union Elementary (Tehama County)	2,210	I	CBO	CBO	Assistant Superintendent	Director	Assistant
Taft City (Kern County)	2,091	I	Executive Assistant to the Superintendent	CBO	Categorical Program Director	Program Specialist	Director

Source: Telephone interviews and website with selected districts

The district would benefit from realigning its certificated management structure at the district level to better support Program Improvement initiatives, curriculum development and oversight, and supervision of special education.

The district could realign its resources to cover most or all of the cost of an assistant superintendent position because it could be assigned duties such as those for which the district is currently paying approximately 30,000 annually in administrative stipends, and the part-time special education coordinator duties for which the district is paying approximately \$48,000 annually. Addition of this position would not require the elimination of any current positions. It would allow the principals to focus solely on their school sites and program improvement initiatives, and allow the special education coordinator to either return to a full-time school psychologist/counselor assignment, or otherwise restructure this position.

Suggested Revised Organizational Chart



Recommendations:

The district should:

1. Consider employing an assistant superintendent of educational and special education services to provide leadership and consistency of the educational delivery system, particularly to better support Program Improvement initiatives and the supervision of special education programs and services.
2. Consider changing its director of human resources position to require an administrative credential so that its requirements and responsibilities are consistent with other positions of this type.
3. Ensure that reporting structures are clear and consistent with the superintendent's expectations.
4. Establish consistent and efficient systems for monitoring and reporting of special education delivery, evaluations of staff, educational programs and other activities.
5. Ensure that the human resources director is responsible for CSIS and CBEDS reporting.
6. Continue monitoring evaluations of certificated staff to fully support teachers in the classroom.

Classified Staffing Structure

The district has designated the following positions as supervisory:

- Coordinator of Human Resources
- Maintenance and Operations Supervisor
- Food Services Supervisor
- Data Services Supervisor
- Technology and Media Services Supervisor

The district's data services supervisor position is complex and has a broad range of duties, from student attendance accounting to coordinating categorical programs, and thus requires a broad understanding of curriculum and instruction. As a result, this position requires more skills and broader knowledge than those needed for clerical data entry and attendance accounting, even though it is also assigned some of these clerical duties. If clerical duties such as attendance accounting and CBEDS coordination were transferred to district office clerical staff, this position could focus more intently on the assessment and accountability measures needed to exit Program Improvement.

The district has five different salary schedules for 10 unrepresented classified positions in the district office, which creates a lack of consistency. The number of steps and longevity increments vary among the salary schedules; some have an indefinite number of longevity steps and some as few as eight total incremental steps. Aligning job requirements and salary schedules with established criteria in a manner similar to how the salary schedule for certificated staff is structured would create more consistency and continuity.

The job description for the district secretary/administrative assistant position was last approved on September 8, 1993 and includes many duties that may have been considered supervisory then but that are no longer being performed. Specifically, the job description states that the position will "train, supervise, and assign work." Interviews with staff made it evident that this position is no longer performing these duties.

Recommendations

The district should:

1. Reorganize duties within the district office to better meet program and student achievement needs.
2. Consider developing a common salary schedule for all unrepresented classified employees.
3. Update and revise the job description for the position of district secretary/administrative assistant to eliminate duties that are no longer being performed and to add or change any new or modified duties.

Appendix

Study Agreement



CSIS California School Information Services

**FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
October 12, 2011**

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

1. BASIS OF AGREEMENT

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

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

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

1. Conduct a comprehensive review of the special education delivery system
Review the leadership and oversight responsibilities of special education and curriculum /instruction
2. Review caseloads regarding all certificated special education staff in relationship to effectiveness of staffing
3. Conduct an evaluation of the student study team process
4. Review the IEP process, documentation process and the effectiveness of follow up procedures
5. Review one-on-one aide requests and staffing for special education
6. Review district office administrative staffing and make recommendations for effectiveness

B. Services and Products to be Provided

Orientation Meeting - The Team will conduct an orientation session at the District to brief District management and supervisory personnel on the procedures of the Team and on the purpose and schedule of the study.

On-site Review - The Team will conduct an on-site review at the District office and at school sites if necessary.

1. Exit Report - The Team will hold an exit meeting at the conclusion of the on-site review to inform the District of significant findings and recommendations to that point.
2. 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.
3. Draft Reports - Sufficient copies of a preliminary draft report will be delivered to the District administration for review and comment.
4. Final Report - Sufficient copies of the final study report will be delivered to the District administration following completion of the review.
5. Follow-Up Support – Six months after the completion of the study, FCMAT will return to the District, if requested, to confirm the District's progress in implementing the recommendations included in the report, at no cost. Status of the recommendations will be documented to the District in a FCMAT Management Letter.

3. PROJECT PERSONNEL

The study team will be supervised by Anthony L. Bridges, CFE, 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 Chief Management Analyst |
| B. | JoAnn Murphy | FCMAT Consultant |
| C. | Anne Stone | FCMAT Consultant |

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

4. **PROJECT COSTS**

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

- A. \$500.00 per day for each Team Member while on site, conducting fieldwork at other locations, preparing and presenting reports, or participating in meetings.
- B. All out-of-pocket expenses, including travel, meals, lodging, etc. The District will be invoiced at actual costs, with 50% of the estimated cost due following the completion of the on-site review and the remaining amount due upon acceptance of the final report by the District.

Based on the elements noted in section 2 A, the total cost of the study is estimated at \$15,000.

- C. Any change to the scope will affect the estimate of total cost.

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

5. **RESPONSIBILITIES OF THE DISTRICT**

- A. The District will provide office and conference room space while on-site reviews are in progress.
- B. The District will provide the following (if requested):
 - 1. A map of the local area
 - 2. Existing policies, regulations and prior reports addressing the study request
 - 3. Current or proposed organizational charts
 - 4. Current and two (2) prior years' audit reports
 - 5. Any documents requested on a supplemental listing
 - 6. Any documents requested on the supplemental listing should be provided to FCMAT in electronic format when possible.
 - 7. Documents that are only available in hard copy should be scanned by the district and sent to FCMAT in an electronic format.
 - 8. All documents should be provided in advance of field work and any delay in the receipt of the requested documentation may affect the start date of the project.

- C. The District Administration will review a preliminary draft copy of the study. Any comments regarding the accuracy of the data presented in the report or the practicability of the recommendations will be reviewed with the Team prior to completion of the final report.

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

6. PROJECT SCHEDULE

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

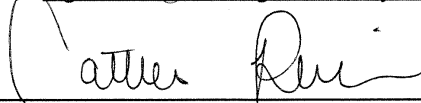
Orientation:	December 13, 2011
Staff Interviews:	December 13-15, 2011
Exit Interviews:	December 15, 2011
Preliminary Report Submitted:	to be determined
Final Report Submitted:	to be determined
Board Presentation:	to be determined
Follow-Up Support:	If requested


7. CONTACT PERSON

Name of contact person: Wes Grossman, CBO

Telephone: (530) 824-7701 x1258 FAX: (530) 824-2493

E-Mail: wgrossma@corningelementary.org

 11/9/2011
 Catherine Reimer, Ed.D. Superintendent Date
 Corning Elementary School District

 October 12, 2011
 Anthony L. Bridges, CFE Date
 Deputy Executive Officer
 Fiscal Crisis and Management Assistance Team