



Elk Grove Unified School District

Special Education Review

April 30, 2010

Joel D. Montero
Chief Executive Officer



CSIS California School Information Services

April 30, 2010

Steven M. Ladd, Ed.D., Superintendent
9510 Elk Grove-Florin Road
Elk Grove Unified School District
Elk Grove, California 95624

Dear Superintendent Ladd,

In September 2009, the Elk Grove Unified School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for a study of the district's special education programs and services. Specifically, the agreement stated that FCMAT would do the following:

1. Review the efficiency of staffing allocations of paraeducators working with the mild/moderate population. Analyze current procedures for identifying the need for instructional aides, the process for monitoring the resources for the allocation of paraeducators and determining the ongoing need for continued support from year to year. Provide recommendations for improvement if applicable.
2. Analyze the increasing costs for nonpublic school placement and provide recommendations to reduce or contain costs. Compare and contrast the costs for nonpublic school placements in the district with the statewide average and districts of comparable size.
3. Examine the efficiency and effectiveness of the inclusive education program and increased reliance on nonpublic agency support for students. Make recommendations for improvement, if applicable.
4. Review the efficiency of speech and language services and other DIS services, including but not limited to school psychology, occupational therapy, physical therapy, adaptive P.E., and nursing. Determine the extent to which there is a duplication of services, the use of entrance and exit criteria, staffing caseloads, etc. Provide recommendations for improvement, if applicable.
5. Review the efficiency and effectiveness of operating a self-contained special education center for students with cognitive delays in a segregated site and provide recommendations for improvement and/or alternative program options, if applicable.

FCMAT

Joel D. Montero, Chief Executive Officer

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6. Analyze the recent 20% increase in the severely handicapped population and provide guidance on cost containment while maintaining quality services.
7. Review the current organizational structure of the special education department and provide recommendations to contain costs and ensure clerical, program and administrative support, if applicable.
8. Examine all special education caseloads and staffing ratios and provide recommendations to reduce increasing costs.
9. Examine fiscal coding of all special education program revenues and expenditures, and provide recommendations that will be more appropriate regarding coding sections, if applicable.
10. Examine preschool programs and placement of locations within the district.
11. Review the special education transportation delivery system. Specifically, review the transportation delivery system of the self-contained special education center, and provide recommendations for transportation services that would be in place if many of the severely handicapped students were to be served in neighborhood schools instead of transported to the center. Review Project Ride and riding therapy programs and provide recommendations that would ensure more effective and efficient services.
12. Review the facilities in the district and provide recommendations on whether it would be feasible to relocate programs and increase the number of regional programs operated within the district.

The attached final report contains the study team's findings and recommendations with regard to the above areas of review. We appreciate the opportunity to serve you, and we extend our thanks to all the staff of the Elk Grove Unified School District for their assistance during this review.

Sincerely,



Joel D. Montero
Chief Executive Officer

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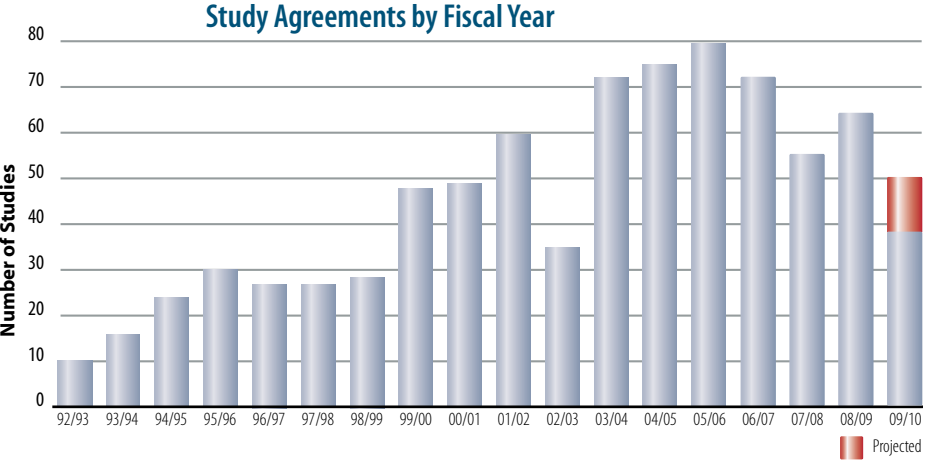
Foreword - FCMAT Background

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

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

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

Since 1992, FCMAT has been engaged to perform nearly 750 reviews for local educational agencies, including school districts, county offices of education, charter schools and community colleges. Services range from fiscal crisis intervention to management review and assistance. FCMAT also provides professional development training. The Kern County Superintendent of Schools is the administrative agent for FCMAT. The agency is guided under the leadership of Joel D. Montero, Chief Executive Officer, with funding derived through appropriations in the state budget and a modest fee schedule for charges to requesting agencies.



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

Introduction

Background

The Elk Grove Unified School District is located south and adjacent to the city of Sacramento and has a geographic area of approximately 320 square miles. The city of Elk Grove and immediate surrounding area is a suburb community of Sacramento; however, a large portion of the geographic area of the district is rural. The Elk Grove USD has approximately 62,000 students served by 39 elementary schools, nine middle schools, nine high schools, three continuation schools, one alternative school, the Jessie Baker School and several nonpublic school locations outside the district. The district has nine general regions identified around each of its nine high schools and middle schools with feeder elementary schools. The district's special education program needs are served by its single-district Special Education Local Area Plan (SELPA).

In July 2009 the Elk Grove Unified School District requested that FCMAT assist the district by reviewing the district's special education programs and transportation services. The study agreement specifies that FCMAT will perform the following.

1. Review the efficiency of staffing allocations of paraeducators working with the mild/moderate population. Analyze current procedures for identifying the need for instructional aides, the process for monitoring the resources for the allocation of paraeducators and determining the ongoing need for continued support from year to year. Make recommendations for improvement, if applicable.
2. Analyze the increasing costs for nonpublic school placement and make recommendations to reduce or contain costs. Compare and contrast the costs for nonpublic school placements in Elk Grove with the statewide average and districts of comparable size.
3. Examine the efficiency and effectiveness of the inclusive education program and increased reliance on nonpublic agency support for students. Make recommendations for improvement, if applicable.
4. Review the efficiency of speech and language services. Determine the extent to which there is a duplication of services, the use of entrance and exit criteria, staffing caseloads, etc. Make recommendations for improvement, if applicable.
5. Review the efficiency and effectiveness of operating a self-contained special education center for students with cognitive delays in a segregated site and make recommendations for improvement.
6. Analyze the recent 20% increase in the severely handicapped population and provide guidance on cost containment while maintaining quality services.

7. Review of current organizational structure of the Special Education Department with recommendations to contain costs, ensure clerical, program and administrative support.
8. Examine all special education caseloads and staffing ratios and provide recommendations to reduce increasing costs.
9. Examine coding of all special education programs and make recommendations that will be more appropriate regarding coding sections (include psychologists).
10. Examine preschool programs and placement of locations within the district.
11. Review the special education transportation delivery system. Specifically, review the transportation delivery system of the self contained special education center, and provide recommendations for transportation services that would be in place if many of the severely handicapped students were to be served in neighborhood schools instead of transported to the center. Review Project Ride and riding therapy programs and provide recommendations that would ensure more effective and efficient services.
12. Review the facilities in the district and provide recommendations on whether it would be feasible to relocate programs and increase the number of regional programs operated within the district.

Study Guidelines

FCMAT visited the district October 20-24, 2009 to conduct interviews with district staff, collect data, review documents and inspect facilities. This report is the result of those activities and is divided into the following sections:

- Paraeducators
- Nonpublic School/Nonpublic Agency Costs
- Inclusive Education Programs
- Speech and Language Services
- Self Contained Education Center
- Severely Handicapped Program and Costs
- Department Organizational Structure
- Staffing Ratios
- Special Education Budget Codes
- Preschool Programs and Placements
- Transportation Services
- Facilities for Program Relocation

Study Team

The study team was composed of the following members:

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



Executive Summary

The Elk Grove Unified School District engaged FCMAT to conduct a review of the special education program services and efficiency of the delivery model. A review of student-teacher staffing ratios, program availability, facilities, program locations and transportation was conducted. This report contains specific recommendations in 12 operational areas to contain special education costs while maintaining high-quality special education programs. Recommendations for staffing ratios, transportation, and program configuration are based on industry standards and best practices. This study identifies opportunities for the district to address specific gaps in program delivery and identifies specific programs that could be expanded to meet changing student needs. In considering any program change, the district will need to take into account the unique needs of the community it serves.

Staffing allocations for paraeducators in mild/moderate, moderate/severe, and autism programs align with district-adopted guidelines. The business, human resources and special education departments closely monitor the practice of replacing and/or assigning new aides.

The paraeducator job descriptions make it difficult to utilize the positions most efficiently. Paraeducators cannot be placed out of class in another assignment when their assignment is no longer required. The job descriptions should be revised so that staff can transition more easily between assignments.

The cost of nonpublic school/nonpublic agency (NPS/NPA) placements has increased to \$17 million for the 2009-10 school year, which includes approximately \$1.5 million for contracted NPA autism services. Student placements in licensed children's institutions (LCI) increased from 106 in 2006-07 to 210 in 2007-08. The district has no control over the number of LCIs that open in its attendance boundaries. However, proactive planning for intensive programs for emotionally disturbed students will allow the district to offer alternative programming, avoid costly out-of-district placements and decrease nonpublic school costs. Efforts are under way to increase the capacity to serve these students in the district.

Overall, the district budgets and applies the appropriate object codes for expenses at the object level with the appropriate resources, although greater accuracy could be achieved. These charges should be reviewed and assigned to the appropriate budget code from the district's chart of accounts.

The number of fully included students has increased approximately 20% per year since 1999. The individualized education programs (IEP) for most of these students identify the support of a 1:1 paraprofessional in the general education classroom. Frequently the district contracts with a nonpublic agency paraeducator at a cost approximately 25% higher

than that of staff employed by the district. This does not reflect benefits costs. Increasing the district's ability to hire 1:1 paraeducators and defining the processes for determining needs will help the district to contain costs for this service.

The district's identification rate for special education (ages 5-22) is 9%, which is consistent with districts of comparable size and is under the statewide average of 10.1%. However, Elk Grove USD exceeds the statewide average in three disability areas: mental retardation, emotional disturbance and autism. The district also mirrors the statewide trend of a decrease in the specific learning disability population, which affects special education budgets and program development. As students with less intensive disabilities such as specific learning disability are replaced by students with autism and emotional disturbance, more intensive and costly services must be provided. The district must adjust its programs to meet the needs of the changing student population.

The district operates a school site for students with moderate to severe disabilities that does not include interaction with typically developing peers. At the same time, students with more severe disabilities are educated on general education campuses and have access to mainstreaming opportunities with age-appropriate peers. The cost for students educated on comprehensive campuses is \$9,835 per ADA, while the cost per ADA for students enrolled at Jessie Baker, a special-education-only school site, is \$18,305, which only includes the direct costs for Baker plus the swimming pool and Project RIDE.

Reassigning the students at Jessie Baker School to other district sites would not necessarily eliminate bus routes because these students would still require transportation as a related service of the IEP. However, ride times would be reduced by having students attend programs in their local region. Some operational costs would be reduced as a result of decreases in miles driven and labor time expended. The district should reevaluate the cost efficiency and programmatic effectiveness of operating the Jessie Baker site with only special education students.

The staffing formulas for speech and language indicate that the district is within the range of the caseloads outlined in Education Code 56363.3. However, FCMAT found that greater efficiency could be achieved through increased consistency regarding procedures with the entrance and exit criteria. Further efficiency can be achieved by eliminating duplicated efforts such as the phonological clinic. Based on an Elk Grove bus metric cost report prepared for bus and student cost analysis and utilized for this report, Elk Grove transportation staff calculated a total daily cost per pre-K phonological therapy bus runs of \$895.31. The pre-K phonological therapy bus runs operate twice weekly for the 36 weeks the program is in operation, for a total of \$64,462.32 that the district would save in transportation costs.

The Special Education Department operates with a Director of Special Education/Special Education Local Plan Area (SELPA) and 12.5 program specialists. 7.5 program specialists are assigned across the nine district regions and five program specialists are assigned

to cross-regional responsibilities with expertise in specific disability areas. Limited time is spent on program development because the primary responsibility of the director is to conduct the day to day operations of the department and SELPA. Parents in focus groups conveyed a desire for improved communication with the district regarding programming needs. FCMAT has recommended a department restructuring that will improve the focus on day to day operations and on restructuring program design.

The district has maximized its special education classes and caseload sizes. Greater efficiency could be achieved in the assignment of school psychologists as well as some administrators in special education programs.

Approximately 5.8% of students identified for special education in Elk Grove are pre-school age, which is consistent with districts of comparable size at 5.4%. The classes are not held in the students' area of residence. Preschool classes are not consistent regarding hours and facilities. The special education route and pupil expense for transportation is below the state average. However, student data and transportation routing showed numerous examples of preschool students being transported well outside their home school or region for placement elsewhere in the district. The district should review where its current preschool population resides to best determine the facility locations and reduce transportation expenditures.

In past years few, if any, facilities were available for new program development, but that is no longer the case. Although the number of classes for students with autism and emotional disturbance increased this year, there are still insufficient programs to meet the district's needs. Without the development of new programs, the district will have to continue to rely on nonpublic schools and agencies for necessary services.

Findings and Recommendations

Paraeducators

Education Code 56362 (f) states that, “At least 80% of the resource specialists within a local plan shall be provided with an instructional aide.” There is no standard interpretation of this Education Code section. Most districts provide all their resource specialists with some paraeducator time, but the amount of time varies. In some districts each resource specialist has paraeducator support that is 80% of a full-time equivalent (FTE). In some districts, paraeducator support is provided for 80% of the teaching day. In many cases the paraeducator support is provided by two part-time aides covering 100% of the teaching day.

It is FCMAT’s experience that in most districts paraeducators are assigned to special day classes for the teaching day, with some additional time for loading and unloading buses if needed.

Guidelines for paraeducator support with fully included students have not been consistently utilized. As shown below, the number of inclusion paraeducators hired by the district has significantly increased over the past three years. There has also been a significant increase in the number of fully included students. Staff reported that about 50 students are either in a special day class or do not meet the full inclusion guidelines for other reasons and yet still receive the services of an inclusion paraeducator.

Number of Inclusion Paraeducators/Level by Year

	2006-07	2007-08	2008-09
Elementary	167	193	221
Middle	19	21	23
High	21	23	26
Total number of paraeducators	207	237	270
Number of inclusion students by year	307	344	390
Average number of hours per paraeducator	6.06	6.22	5.88

Source: Elk Grove staffing records

The business office, human resources and special education departments keep accurate records of the number of paraeducators, their FTEs and their assignments. These depart-

ments report that the position control and approval processes for hiring either replacement or new paraeducators are effective.

In 2006-07, an inclusion paraeducator's assignment averaged 6.06 hours/day; 207 inclusion paraeducators worked with 307 fully included students. To meet the needs of these students, many of the inclusion paraeducators were assigned to more than one student. This also occurred in 2007-08 when an inclusion paraeducator's assignment averaged 6.22 hours/day and in 2008-09 when the average assignment was 5.88 hours/day.

The district has paraeducator job descriptions for the following positions:

- Inclusive education/severely disabled
- Independent living skills
- Severely disabled
- Crossroads program
- Non-severely disabled

The job descriptions contain only minor differences, and five separate job descriptions make it very difficult to move a paraeducator when the need arises. In addition, staff and administrators reported that the efficient use of paraeducators on site is impeded by their separate classifications. For example, if a full inclusion paraeducator's student is absent and the paraeducator in the moderate/severe special day class is absent, the inclusion paraeducator cannot be reassigned for the day. Instead, a substitute is called, and the inclusion paraeducator stays in the general education class. Each time this occurs there are additional costs to the special education program.

Restrictive job descriptions and the problems that arise from them also make it difficult to schedule support for a fully included student during specific hours of a day with staff other than a full-time paraeducator.

The Special Education Department has recently developed a document titled Procedures for Requesting Additional Paraeducator Support. The procedures include clarifications regarding the use of natural supports and existing staff whenever possible and that the primary goal for all students is independence. The forms utilized include documentation of the reasons for requesting the additional support, but do not clarify the natural or existing support available at the site or the behaviors or activities that require the additional support. The instructions state that the effectiveness and role of the paraeducator is to be reviewed at least annually.

The documentation for additional paraeducator support does not include how to support the included student when the paraeducator is absent or the responsibility of the paraeducator when the student is absent.

Special education paraeducators have not been evaluated timely and systematically. Staff reported that some paraeducators have not been evaluated in more than three years.

Recommendations

The district should:

1. Review all paraeducator positions using the criteria in the Procedures for Requesting Additional Paraeducator Support.
2. Review all paraeducator assignments to determine if staffing should be one full-time or two part-time positions.
3. Continue monitoring aide time assigned to each teacher based on Procedures for Requesting Additional Paraeducator Support.
4. Review the need for an inclusion paraeducator at every inclusion student's annual IEP using the Procedures for Requesting Additional Paraeducator Support.
5. Include a form (see Appendix B) in the Procedures for Requesting Additional Paraeducator Support to determine when paraeducator support is specifically required in a special day class or for an inclusion student.
6. Train program specialists, site administrators and special education teachers in the Procedures for Requesting Additional Paraeducator Support.
7. Ensure that every inclusion student has goals that address independence from adult supports.
8. Ensure that every inclusion student has a provision in the IEP for fading adult supports.
9. Ensure that each site has plans for how the included student will be supported when the paraeducator is absent, and for what the inclusion paraeducator will be assigned to do when the student is absent or when adult support is faded.
10. Ensure that the other instructional staff that supports the included student has adequate information and training to provide the supports necessary.
11. Review and revise aide job descriptions to provide more flexibility for administrators so that paraeducators can be allocated where they are needed rather than by a job classification.
12. Ensure that all paraeducators are evaluated on a regular schedule.

Nonpublic School/Nonpublic Agency Costs

Nonpublic Schools

Nonpublic schools (NPS) are certified by the state Department of Education and contract with districts and SELPAs to provide the appropriate facilities, designated instruction and services required by individuals with exceptional needs when no appropriate public education program is available. The Elk Grove USD currently contracts with 34 non-public schools.

The cost for students attending NPS has steadily increased for the past three years, with the largest increase occurring between 2006-07 and 2007-08. One reason for this increase was the number of licensed children's institutions (LCI) in the district serving special education students.

NPS costs from 2006-07 to 2008-09

Year	NPS Costs	% Increase	NPS ADA
2006-07	10,568,229		356.41
2007-08	11,385,144	7.54%	363.31
2008-09	11,628,834	2.14%	371.67

Sources: District financial reports; ADA reports on CDE Web site

The table on the next page includes all Elk Grove students who attended an NPS during the school year. Most of the students were in that placement for most of the year, but for some it was only a few days or weeks.

From 2006 through June 2009 the number of students placed into an NPS with emotional disturbance, autism, and mental retardation increased substantially. The number of students in other eligibility categories also increased, although there were relatively few students in those categories.

Elk Grove USD students in NPS by disability

	2006-07	2007-08	2008-09
Autism	66	87	96
Emotionally disturbed	209	198	182
Specific learning disability	5	1	9
Speech	1	1	1
Hard of hearing	5	2	3
Traumatic brain injury	0	0	0
Multiple disabilities	2	3	3
Other health impaired	3	4	2
Mental retardation	23	62	64
Total number of NPS students	319	315	312
Total No. of LCI/NPS students	104	103	93

The last nonpublic school data reported by the state was for 2007-08. At that time, 14,797 or .08% of all special education students were in a nonpublic school. However, nonpublic schools and LCIs are not available as an option in many California counties. Therefore, it may not be valid to compare the state average to Elk Grove USD.

The table below compares the number of students in an NPS placement in Elk Grove USD with four other districts of similar size. The very low number reported by Fresno is an example of a county that has no nonpublic schools. Elk Grove USD's numbers are comparable to the other districts in this area.

Number of students in an NPS placement, Oct. 1, 2009

Sacramento City	San Juan	Fresno	San Bernardino	Elk Grove
377	233	4	156	297

Source: Comparable districts by size report

LCI students were 36% of the total number of Elk Grove NPS placements in 2008-09. These students often came into the district with NPS on their IEP, and were immediately placed into an NPS. The program specialist assigned to nonpublic schools has the authority to place students into an NPS based on their most current IEP.

Staff and administrators reported that there are not appropriate or sufficient district classes for students with significant behavior problems, e.g., emotionally disturbed, autistic, or mentally retarded. Programs should be available for all grade levels. Programs should be located either in all regions or, if this is not possible, where most of the students

reside to reduce transportation costs. Whenever possible, these high intensity classes should be grouped (two classes at a site). This will allow teamwork, reduce duplication of services, and reduce travel time for support providers. Specific information regarding facilities is discussed in another section of this report.

Staff and administrators also stated that students may be placed into an NPS because the district has no behavior intervention case managers (BICM). When a student needs a full functional analysis and a behavior intervention plan, the district has to contract out these services. Behavior support plans are developed, but they are often insufficient to meet the more demanding behavioral issues. Staff should be trained in behavioral management techniques and should develop appropriate behavior plans to meet the needs of more challenging students.

Once a student has been placed in an NPS, they usually do not return to a district-operated program. This circumstance is not unique to Elk Grove USD. In addition to the reasons previously stated for NPS placements (automatic LCI placements, insufficient number of appropriate district classes, and insufficient behavior plans), site administrators and teachers do not have a true understanding of NPS costs.

Staff and administrators reported that goals and a transition plan to return the student to the district are not included in every NPS IEP. This also contributes to students staying in nonpublic schools.

Recommendations

The district should:

1. During the transition IEP for all newly enrolled students, ensure that an appropriate district program is offered prior to enrollment in an NPS.
2. Ensure that the special education director is involved in all NPS placements prior to the actual placement to ensure its necessity.
3. Develop district programs to meet the needs of most students in NPS placements: emotional disturbance, autism, and mental retardation.
4. Ensure that students are not referred for an NPS when behavior is the issue unless a full functional analysis is developed and appropriately implemented.
5. Hire or train current district staff to become BICMs to eliminate the need to contract with private agencies for this assessment.
6. Inform site staff of the actual costs of each special education NPS placement.
7. Ensure that all NPS IEPs have goals and a transition plan to return the student to a district program.

Nonpublic Agencies

A nonpublic agency (NPA) is certified by the state Department of Education and contracts with a district to provide the appropriate special education designated instruction and services required by the individual with exceptional needs when no appropriate public education program is available. Nonpublic agencies may provide services in areas such as occupational therapy, speech therapy or behavior support.

The table below shows the cost increases from 2006 to 2010. The cost increase from 2006-07 to 2007-08 has had a lasting impact on the special education budget.

NPA cost increases from 2006 to 2010

Year	NPA Costs*	Percentage Increase
2006-07	4,379,451.31	N/A
2007-08	5,131,574.73	17.17%
2008-09	5,366,831.66	4.58%
2009-10	5,260,682.00	-1.98%

**Source: Budgeted projected costs; no % increase given for 2006-07 since 2005-06 data was unavailable*

The table below categorizes the certified NPAs that were under contract with Elk Grove for 2008-09. To determine how to reduce NPA expenditures, it is first important to understand how the funds were spent. Most of the NPA funds were expended in the category of autism/behavior. These large contracts support the need for the district to develop programs that reduce the reliance on NPAs to provide needed services. The number of students in each contract by grade will further help the district to determine which programs to begin developing.

Certified NPAs by category for 2008-09

Nonpublic Agencies under Contract with Elk Grove	PT/OT	Speech	Autism/Behavior	Music
Occupational Therapy Consultants	54,375.00			
Easter Seal Society	15,890.00			
Music				4,165.00
Burger PT	3,775.00			
Vista Child Therapy		48,355.00		
Advance Kids, Inc.			1,037,566.79	
Speech and Lang. Therapy		181,500.00		
Hoey, Cathy		28,690.00		
Center for Speech Pathology		20,424.50		
Children's Therapy	20,496.25			
B.E.S.T.			294,499.05	
Music to Grow On				25,503.55
C.A.R.D.			364,459.95	
Learning Solutions			399,776.94	
OT for Children	45,900.00			
Karen Gale		41,407.50		
Lovaas			88,277.25	
Monarch Speech and Language		39,805.00		
Taylor Pediatric	46,917.00			
H.O.P.E Consulting			137,301.45	
Foothill Speech		3,195.00		
Run and Jump Therapy	53,408.75			
Bright Start Therapy	30,610.00			
Behavior Consultants Int.			14,556.44	
Capital Autism			129,296.70	
Bridges			739,257.87	
Therapeutic Pathways			541,468.58	
MacNeill Pediatric	92,966.00			
Laguna Physical Therapy	48,425.00			
Anne Howard				11,475.00
Talking Too			60,040.00	
ISI Healthcare	800.00			
Hear Say Speech			35,678.75	
Total	413,563.00	363,377.00	3,842,179.65	41,143.55

Source: Elk Grove Actuals

An additional 16 vendors on the list are not state-certified as NPAs. As shown in the table below, some of the noncertified agencies were paid because of a mediation or due process. In that case, the agency may not need to be certified. Other agencies are listed that provide services to special education students but are not certified. This may also be an appropriate use of funds. These agencies should not be included in the NPA costs. As with the certified NPA list, it is important to categorize the services provided by these agencies to help determine how best to reduce the reliance on outside agencies.

Agencies on the NPA list that are not certified NPAs

Noncertified Providers	Speech	Autism/ Behavior	From Mediation	Other
Roger Stein		2,775.00		
TLC Child and Family			42,022.74	
Natalee Larivee	2,689.75			
Eaton Interpreting Sign for H/HOH				93,667.50
Speech Pathology	21,266.05			
Safeguard Adolescent (escort)				1,000.00
Scott Yi (mileage)				424.60
Keeping Pace Learning Center				24,597.50
Beca-Behavioral		160,349.03		
JT Enterprise		13,200.00		
Kristine Stong (Assessment)				3,897.80
Kendall School				39,193.75
Healing Pathways Med Clinic		9,000.00		
James Jarosick			4,972.80	
Learning Edge (Mediation)			26,505.00	
Angela Curren				4,080.00
Total	23,955.80	185,324.03	73,500.54	166,861.15

Source: Elk Grove Actuals

In 2008-09, the district contracted for the following services:

- Physical therapy – \$413,563.00
- Speech – \$390,332.80
- Autism/behavior – \$4,027,503.68
- Music – \$41,143.55
- Mediation agreements – \$73,500.54
- Other contracted services – \$166,861.15

Although it is difficult to find appropriately credentialed or licensed staff in areas such as physical therapy, occupational therapy, and speech, the costs to provide these services through an NPA exceeds what it would cost to hire district staff by 25-35% when comparing the average cost of NPAs and the average cost of salaries as provided by the district. Autism/behavior accounts for most of the NPA costs. When combined with the NPS costs for students with autism/behavior, the need for district programs is apparent.

Recommendations

The district should:

1. Ensure that services coded as NPA costs are appropriately charged to that category.
2. Remove the vendors that provide non-special education services from the special education NPA list.
3. Continue developing autism and behavior programs to reduce the reliance on NPAs for those services.
4. Consider developing an in-house program for credentialing speech therapists.
5. Develop a new job classification for Certified Occupational Therapist Assistant (COTA) to provide more district service capacity, thus reducing reliance on nonpublic agencies.



Inclusive Education Programs

The number of special education students in the district who are fully included in a regular education classroom has increased by about 20% per year since 1999. This has caused a concomitant increase in the number of paraeducators, credentialed staff and support staff. There were 77 included students in 1999 and 390 included students enrolled so far this year. Staff stated that about 50 of the current students do not meet the district criteria for inclusive education. These students are either in a special day class or may be in the inclusion education program because they meet non-severely handicapped eligibility criteria.

The Procedures for Requesting Additional Paraeducator Support have not been previously used for placing paraeducators with included students. Therefore, paraeducators may be assigned to a student for more hours than is needed. For example, a student who only needs assistance one to two times per day may have a 5.5 hour paraeducator because one of these times is in the morning and one is in the afternoon.

Teachers who have an inclusive education student in their class receive a \$500 stipend. As stated in the teacher contract, item 22.1501, “Each teacher of a fully included student shall have discretion in spending the \$500 allocation in electing from a menu of options including release time, training, materials (regular education if so indicated by the teacher), and exchange duties.” However, staff reported to FCMAT that this stipend has not always been monitored. If the student moves out of the district or to another class in the district, the money that was not spent either returns to the district or follows the student to the new program. Therefore, teachers report that they often spend the stipend as quickly as possible, even if items are not needed.

In some cases an NPA paraeducator is hired rather than a district employee. This usually occurs when:

- The parent has an established relationship with the NPA from the infant-toddler program operated by the regional center or the county office
- The district does not have the appropriately trained staff to provide the program as defined in the IEP
- A mediated agreement determines that an NPA will provide the services

Teachers and site administrators report that they often have minimal information about an included student before the student arrives at the school site. Teachers may not have easy access to the inclusion specialist depending on the number of sites that the inclusion specialist serves, and therefore often rely on the paraeducator for information and suggestions. No time is built into the paraeducator’s schedule to meet with the classroom teacher or inclusion specialist.

Recommendations

The district should:

1. Review each of the included students to determine if any do not meet the district's criteria for inclusion education. For students who need paraeducator support, determine how those paraeducators will be separately tracked so that the costs for included students and non-included students are not merged.
2. Use the Procedures for Requesting Additional Paraeducator Support in determining if a paraeducator is required, duration of support, and if any natural supports or other paraeducators are available during those times.
3. Utilize the Procedures for Requesting Additional Paraeducator Support as a guide when considering services of an NPA.
4. If data collection is required, determine if there are any other means of collecting the data other than by a paraeducator, such as by any DIS staff working with the student, the inclusion specialist or the teacher.
5. Train site administrators and teachers in the methodology for effectively educating autistic and behaviorally challenged students.
6. Ensure that teachers of included students and site administrators receive adequate information in a timely manner regarding incoming students.
7. Develop a system in which the inclusion teacher, inclusion specialist and paraeducator meet at least once a month to review progress and strategies and make adjustments as needed.
8. Revisit the stipend paid to teachers of included students. If this stipend is not eliminated or significantly reduced, establish controls to monitor the expenditures.

Speech and Language Services

Staffing

Through district data and interviews with speech and language pathologists and administrative staff, FCMAT found that 1,964 students are served throughout the district by 46.1 full-time equivalent (FTE) speech and language pathologists and an additional 1.7 FTE pathologists serving the preschool program, for a total of 47.8 FTE speech and language pathologists. This is an average of 41 students per pathologist, placing the district within range of the caseload limits outlined in Education Code 56363.3.

Efficiency

Efficient implementation of district processes and procedures, communication and follow-through with staff will help ensure that services for students and families are provided in a timely fashion. During interviews with administration and practitioners, FCMAT found that communication is inconsistent regarding changes in policy and procedures provided to speech and language pathologists.

District speech and language pathologists indicated that therapists at different sites complete the same tasks using different procedures without adhering to district processes. Changes in procedures are not consistently communicated to all staff. District administrators and speech and language staff indicated a handbook is being developed to standardize these processes; however, it is not yet complete.

Duplication of Services

Interviews with administrators and practitioners indicate that some preschool language services have recently been redesigned to provide speech and language therapies at students' resident schools. More efficient use of staff has allowed the district to hold down increasing costs. However, the district continues to provide phonological clinics for 32 children, ages 3.5-5, at two school sites, Robert J. Fite Elementary and Arthur Butler Elementary. Neither site is centrally located, which would shorten students' ride time and cut the expense of transporting students who attend for brief therapy sessions.

According to a bus metric data report for the district's pre-K phonological therapy bus routes, the 32 students are transported twice weekly to 90-minute therapy sessions at one of two sites. Each of the 32 students attends either a Monday/Wednesday session or a Tuesday/Thursday session with differing times at each site. The transportation program operates approximately 10 dedicated mid-day assignment runs for this program.

According to data provided by the transportation staff, the bus routes cost an average of \$89 each, for a total daily cost of \$895. FCMAT estimates the district could save \$64,476 annually in transportation expenses based on a conservative estimate of 36 weeks if the

district begins providing the pre-K phonological speech and language support at students' neighborhood schools. District and school site staff indicated the students currently served at the phonological clinic could be served appropriately at their resident school or in the district's existing preschool programs. A secondary option to reduce the high transportation expense for this program is to better centralize the clinic locations for Pre-K students, which would reduce transportation expense as well as student ride times.

This redesign of the phonological clinic would allow the district to eliminate the estimated annual transportation cost of \$64,476 and to either reassign the therapist serving these students or reduce an FTE at an additional savings of \$61,613. This staff reduction is possible because the current caseload average of 41 provides the opportunity to absorb preschool students at their resident schools in assigned speech and language caseloads. Based on an Elk Grove bus metric cost report prepared for bus and student cost analysis and utilized for this report, Elk Grove transportation staff calculated a total daily cost per pre-K phonological therapy bus runs of \$895.31. The pre-K phonological therapy bus runs operate twice weekly for the 36 weeks the program is in operation, for a total of \$64,462.32 that the district would save in transportation costs.

Of the 1,964 total students receiving speech and language services on an IEP, district data indicates 1,296 of these students are currently receiving speech and language as their primary service (unduplicated), while 668 students receive a related service (duplicated). Statistics compiled by the district based on CASEMIS data dated December 1, 2008 shows that 943 of the 1,245 students receiving speech and language services – or about 75% – were between 3 and 9 years of age. The district may need to take a closer look at students who are eligible to receive special education services – for example, students who require services for single-sound errors only – and provide intervention such as the San Diego USD speech improvement class model. San Diego USD is one of the first districts to provide such a model with documented outcomes through to provision of intervention prior to special education support.

Exit Criteria

The district has documented procedures for removing students from speech and language services, when appropriate. However, interviews with staff and a review of district data indicate these procedures are not always followed. Speech and language pathologists expressed frustration regarding a lack of support by school site staff when speech and language pathologists recommend during IEP meetings that a student be removed from speech and language services based on assessment and progress. Despite these recommendations, students often continue receiving speech and language services as a consequence of an IEP team decision.

Recommendations

The district should:

1. Complete work on the speech and language pathologist procedures manual; train all staff and develop methods to ensure all staff receive the same information in a consistent manner. This may include Web site development or newsletters.
2. Ensure that information disseminated at meetings is provided to staff not in attendance.
3. Consider relocating the services now provided in the phonological clinic to resident schools and existing preschool programs.
4. Consider the reduction of 1.0 FTE position in speech and language services once preschool students are absorbed into existing school site caseloads.
5. Conduct training for all staff (classroom, principals and administrative designees for IEP meetings) on district procedures regarding IEP development and exit criteria for special education services.
6. Conduct a review of the students receiving speech and language services for single-sound errors as their primary service (unduplicated) to prepare for developing an intervention model of service.
7. Develop an intervention model to address the needs of students who have IEPs related to single-sound errors. Students demonstrating these types of errors can be addressed in the general education setting and outside the IEP process (e.g., the San Diego Unified speech improvement class model).



Self-Contained Special Education Center

For students with disabilities, access to public education dates back to civil rights legislation in the 1960s. Congress passed the Rehabilitation Act in 1973, the first significant piece of legislation designed to ensure equal opportunity and access for people with disabilities.

In 1975, Congress enacted the Education for All Handicapped Children Act, which was renamed the Individuals with Disabilities Education Act (IDEA) in 1990. With each reauthorization Congress has provided clear language regarding the instruction of students with disabilities in integrated settings with non-disabled students.

Jessie Baker School serves students, ages 3 through 22, with moderate to severe disabilities. Currently, the school serves 163 students in 13 special education classrooms. Through interviews with administrative staff at Jessie Baker School and school site visits, FCMAT found that Jessie Baker School has a segregated environment that does not integrate disabled students with typically developing peers.

Staff reported that when they identify a student as a candidate for an integrated program for all or part of the school day, the parent requests that integration be coordinated with a school site near Jessie Baker School rather than the student's school of residence. However, through interviews with Jessie Baker administrative staff, teachers and district administrators, FCMAT found none of the students attending Jessie Baker to be participating in mainstreaming opportunities on any general education campus. Therefore, the students do not access the environment of their home school or area of residence.

Although California Education Code Section 560401.1(b) permits the removal of individuals with exceptional needs from the regular educational environment, this may occur "only if the nature or severity of the disability is such that education in the regular classes with the use of supplementary aides and services cannot be achieved satisfactorily." Both the district special education director and program specialist described placement procedures for students needing special education services that may include a more restrictive setting. A weekly staffing with program specialists, which includes the principal of Jessie Baker, is held to discuss students who may need a review of the educational setting or additional supports and services. However, the process for placement of students at Jessie Baker does not follow the procedures outlined by staff.

Interviews with Jessie Baker School administrative staff and classroom teachers indicate that students often are referred to this school via direct contact from a student's case manager at a comprehensive campus or the student's parents who contact the school directly. Of the 11 students who have enrolled in Jessie Baker since July 1, 2009, the district director of special education was unaware that three of these students did not go through the district's placement process to determine the need for a more restrictive environment.

FCMAT found, through site visitation to Jessie Baker School and comprehensive campuses, and interviews with district staff, that students with more severe disabilities than those at the Jessie Baker School are educated on general education campuses and have access to mainstreaming opportunities with age-appropriate peers.

Additionally, once students are placed at Jessie Baker, they do not transition back to comprehensive campuses and less restrictive environments.

Interviews with special education staff and the Jessie Baker School administrator indicate a primary need of students attending Jessie Baker is the improvement of communication skills. This is typical for students who fall into the moderate/severe range of disabilities. Jessie Baker teachers and the administrator described the instructional program at the school as communication-based. FCMAT team members observed teachers focusing on communication skills in their lessons. In addition to instructional services provided by special education teachers, support services in the form of speech and language and adaptive physical education are also provided to students attending Jessie Baker.

A full-time speech and language pathologist is assigned to the campus. Currently 124 students have speech and language services on their IEPs. These services are provided in the classroom as group activity with classroom staff as opposed to direct individual services.

District financial data indicates the average speech and language pathologist receives \$53.52 per hour, without benefits. Time studies conducted for medical billing found the average IEP meeting is two hours long. Additionally, the average preparation for each IEP is two hours. Using this data, the projected cost of a speech and language pathologist using 496 instructional hours in the development of IEPs for students at Jessie Baker is \$26,546 per year. Since students at Jessie Baker receive communication-focused instruction throughout the school day by the classroom special education teacher, a review of staffing allocation for speech and language may be in order to determine if this is the most efficient use of staff.

A review of district data and interviews with staff indicate 1.4 FTE adaptive physical education (APE) instructors are assigned to Jessie Baker, serving 129 students who have APE on their IEPs. These services are also provided as group classroom activities with classroom staff. Of the IEPs reviewed, APE services on an individual basis were not found. As with the speech and language services at Jessie Baker, a review of this allocation may be in order to determine whether this is the most efficient use of staff.

The annual cost for students in self-contained classrooms on comprehensive campuses is \$9,835 per ADA while the cost for students enrolled at Jessie Baker is \$18,305 per ADA, according to district data.

Recommendations

The district should:

1. Consider restructuring how locations are assigned and services are provided to ensure that students at Jessie Baker are included on general education campuses in the least restrictive environment possible and are educated with nondisabled peers to the maximum extent possible, per Section 300.114 of Title 34 of the Code of Federal Regulations.
2. Ensure that all district staff follow district policy and procedures to identify appropriate placements and services for all students receiving special education.
3. Conduct a review to determine how speech and language and adaptive physical education services may be provided on a comprehensive campus to more effectively use resources. It is more cost effective for services to be provided through the general education program with the support and consultation of a speech and language pathologist and physical therapist.
4. Review the IEPs for students enrolled at Jessie Baker to determine how many speech and language goals are specifically related to communication skills included in the daily classroom instruction vs. those identifying articulation needs; consider a review of the speech and language allocation to the site.
5. Review students' IEPs to assess the design of physical education programs and the related staffing allocation for Jessie Baker School.

Severely Handicapped Program and Costs

Using the December count from the California Special Education Management Information System (CASEMIS) over the past three years, FCMAT found that the 9% identification rate of Elk Grove students for special education (ages 5-22) is consistent with districts of comparable size, though it is less than the statewide average of 10.1%.

Identification rates for comparable districts (by size) and California ages 5-22

School Year	Elk Grove	Fresno	Santa Ana	San Bernardino	California
2006-07	9%	10%	9%	10%	10.1%
2007-08	9%	10.1%	8%	9%	10.1%
2008-09	9.1%	10%	9%	9%	10.1%

Source: California Special Education Management Information System (CASEMIS) Dec. 2006-08

FCMAT analyzed three significant areas of severely handicapped populations in Elk Grove using CASEMIS over the past three years and found the following:

- Elk Grove exceeds the statewide average in all three areas: mental retardation, emotional disturbance (ED) and autism.
- The district also exceeds comparable districts (by size) in the areas of autism and emotional disturbance.
- The district is comparable to districts of similar size in the area of mental retardation but exceeds the statewide average.
- Elk Grove has remained at virtually the same percentage each year in the identification of mental retardation.

Average identification rate of mental retardation for special education in comparable size districts/state

School Year	Elk Grove	Fresno	Santa Ana	San Bernardino	California
2006-07	9%	8%	9%	8.2%	6.4%
2007-08	9%	8.1%	9%	9%	6.3%
2008-09	9.3%	9%	8%	9%	6.2%

Source: CASEMIS December 2006-08

Average identification rate of emotional disturbance for special education in comparable size districts/state

School Year	Elk Grove	Fresno	Santa Ana	San Bernardino	California
2006-07	6.3%	3.1%	3%	4%	4%
2007-08	7%	3%	2%	4%	4%
2008-09	7%	3.3%	2%	4%	4%

Source: CASEMIS December 2006-08

The district's population of students identified with emotional disturbance exceeds the statewide average and districts of comparable size. It is impacted by the high number of LCI programs located inside the district's boundaries. In 2008-09 the number of students placed in LCIs with IEPs for nonpublic schools increased by 100. Most of these students have the ED identification on their IEP with previous placements designated for nonpublic school. In the absence of district provided appropriate programs, the total costs for nonpublic schools has risen by 11.3% in the past two years.

Average identification rate of autism for special education in comparable districts/state

School Year	Elk Grove	Fresno	Santa Ana	San Bernardino	California
2006-07	8%	3.2%	5%	3%	6%
2007-08	9%	4%	7%	4.3%	7%
2008-09	10%	5%	8%	5.4%	8.4%

Source: CASEMIS December 2006-08

The district rate of autism identification exceeds both districts of comparable size and the statewide average. The increasing rate is also reflected in the nonpublic school placements of 96 students with autism and the increases in nonpublic agency services for behavior support. These costs have increased by 22% in the past two years.

The district's severely handicapped population is increasing at a rate higher than the statewide average and comparable districts (by size). Emotional disturbance and autism spectrum disorders have had the most significant growth. Both require intensive and costly programming for students. The district has no control over the number of LCIs that open within its boundaries. However, proactive planning for intensive ED programs will allow the district to offer alternative programming and avoid costly placements in nonpublic schools.

Specific learning disability identification rates for Elk Grove and California

School Year	Elk Grove	California
2006-07	49%	51%
2007-08	46%	44%
2008-09	45%	43%

Source: CASEMIS

The decrease in specific learning disabilities as an eligibility category and the corresponding increase in autism and emotional disturbance are not unique to Elk Grove; they are consistent with statewide trends. This has a fiscal impact for all districts. Programs for mild to moderate populations, which are low-cost, are being replaced by intensive programs for autism spectrum disorders, mental health and other severe handicaps, which are costly and labor intensive.

The district is formulating plans to increase its capacity to serve severely handicapped students and decrease reliance on nonpublic schools and agencies, as follows:

- The Eagle Academy for students with autism has opened at Sierra Enterprise Elementary School.
- Three new intensive ED classes have opened at Valley High School, James Rutter Middle School and Sierra Enterprise Elementary School.
- Three board-certified behavior analysts are under contract to reduce reliance on nonpublic agency supports.

The range of intensive service delivery for students with autism is costly. In the absence of district-provided programs and services, the district has been forced to rely on nonpublic agencies. The district must develop programs and services that can accommodate the growth that will naturally occur in ED and autism. Continued focus on these areas for program development will build the district's capacity to meet the needs of the growing severely handicapped population.

Recommendations

The district should:

1. Continue proactive efforts to serve the ED and autism populations with district programs and services.
2. Continue to build defensible options to nonpublic schools.
3. Meet with newly formed LCI operators and offer district educational options in lieu of nonpublic school placements.
4. Change interim placement procedures for LCI students that include 30-day placements in the public school setting instead of automatic NPS placements.
5. Continue district plans to expand autism programs and decrease dependency on NPA services.



Department Organizational Structure

The district's Special Education Department structure contains two support systems. The first is comprised of 7.5 regional program specialists, with each providing services for one high school, one feeder middle school and some elementary schools. The second includes 5.0 program specialists assigned to cross-regional responsibilities that include areas of specific expertise: emotional disturbance, mild to moderate; designated instruction services; speech and language; nonpublic schools; workability; home teaching; and pre-K autism. The 32 FTE psychologists are supervised by the Student Support and Health Services Department. There is little overlap between psychologists, program specialists and other special education staff. Efficiency is compromised because the daily responsibilities are too broad for one manager, impacting day-to-day operations, decision making and communication. This limits the time spent on planning and program support.

The director of special education oversees the daily operations of the department, including the regional and cross-regional program specialists. Through interviews with 25 parents, FCMAT found a number of concerns regarding communication and other issues that were also confirmed by school site staff:

- Parents don't know who to call when they have concerns about services.
- Parents feel they are being ignored.
- Parents are not informed about available educational options in the district.
- Parents and staff reported that program specialists do not return their phone calls.
- Parents complain of adversarial and rude contact with special education clerical staff.
- Staff have concerns about a lack of communication within the department and a perceived lack of cohesive policy or procedure.
- Program specialists' ability to respond to questions or concerns is hindered by the need to wait for direction or a decision from the department director.
- Parents don't trust the department with regard to the provision of special education and related services under IDEA. Parents do not believe that the district follows through on agreements.
- The director of special education also serves as the SELPA director because Elk Grove is a single-district SELPA.

The district should consider a redesign of the administrative support structure to reduce some of the director's daily operational duties and build in time for program development, as shown in following table.

Associate Superintendent, Educational Services		
Director of Special Education		
SELPA/CAC (Director of Special Ed)	Coordinator, Operations	Coordinator, Program Development
Local plan	RSP (9)+ regional team	Alt programs/cross region
CASEMIS	Interdepartmental comm.	Program design and dev.
State reports	District procedures	Interdepartmental coordination for program design
Due process	Staffing plan	Program design Implementation
Interagency coordination	Staff development	NPS contracts
California Children's Services		Maintenance of existing programs
Regional planning		
Parent communication		

Within existing clerical resources, each coordinator should have the support of an office assistant III. However, the job descriptions will have to be adjusted because office assistants should have the ability to manage their own data input while continuing to handle their current responsibilities instead of assigning this duty to other designated positions.

Recommendations

The district should:

1. Under the supervision of the director, identify a coordinator of operations for special education. This person would be responsible for coordinating the nine regional teams, interdepartmental communication, development and monitoring of the department staffing plan, staff development and all other day-to-day issues.
2. Under the supervision of the director, identify a coordinator of program development for special education who would be responsible for program development and design, alternative program and cross-regional program specialists in autism and ED, and program maintenance.
3. Reconsider the effectiveness of the cross-regional program specialist positions other than the specialists in autism and ED.
4. Maintain the SELPA responsibilities with the director of special education such as local plan, CAC, CASEMIS, state reports, due process, and interagency coordination.

Staffing Ratios

The district engaged FCMAT to conduct a review of the current organizational structure of the special education department and staffing ratios and make recommendations to contain costs while maintaining program quality. Comparative statewide survey data is available for the analysis of assignment formulas for special day classes for mild/moderate and moderate/severe classes. This data was compiled by School Services of California, Inc. (SSC) and is recognized as a set of staffing guidelines used by districts across the state.

Recommended paraeducator-to-student ratios for mild/moderate SDC

Grade Level	Students per Paraeducator
Preschool	10-12
K-8	12
9-12	12-15

Source: School Services of California, Inc. 2008; Elk Grove staffing records

Recommended paraeducator-to-student ratios for moderate/severe SDC

Primary Disability	Students per Paraeducator
Autism	8
Hearing Impaired	8-10
Multi-Handicapped	8-10
Orthopedically Impaired	8
Emotionally Disturbed	8-10
Developmentally Delayed	10-12

Source: Elk Grove Budget and CBEDS

The caseloads of all mild-to-moderate and moderate-to-severe classes in the district are within the guidelines established by statewide practice as reported by School Services, Inc.

The average caseload for speech therapists in the district is 55 and is consistent with Education Code 56363.3 requirements.

Based on CBEDS, the ratio of FTE psychologists to students in California (2007-08) is 1:1,328; the figures for 2008-09 are not available at this time. The district ratio is 1:2,005, significantly above the state average.

The Student Support and Health Services Department has a full-time lead psychologist, whose primary responsibilities are the coordination of psychologist services, coordination

of interns and monthly meetings, observations and consultations with psychologists, coverage for psychologist absences and MAA billing for psychologists. The lead psychologist has no assigned caseload responsibilities for assessment or school support.

The average enrollment per school in the district is 800. However, the district maintains a full-time principal at Jessie Baker with an average enrollment of 158. This ratio is much lower than the district practice of one principal per 800 students.

Recommendations

The district should:

1. Consider the following options: a) Leave the psychologists in their current assignments; b) Reassign the lead psychologist and reduce the ratio to 1:1,942; c) Maintain the psychologist ratio at 1:2,005 and eliminate the lead psychologist position for a savings of \$85,000; d) Hire an additional psychologist, reducing the ratio, and expand MAA and LEA Medi-Cal billing to maximize reimbursements.
2. Evaluate the cost effectiveness of the full-time principal position at Baker School, and determine what other duties could be assigned to this position.

Special Education Budget Codes

The detail of Special Education expenditures for the 2008-09 year was reviewed. Overall, the district is coding expenses to the appropriate objects within the appropriate resources. However, the transportation costs, including vehicle repairs and parent reimbursement for home-to-school costs charged to resource 6500, should be charged to Resource 7240.

The coding for psychologists was also reviewed. The district has budgeted 33.05 FTE in psychologist positions. Of this, 77.61%, or 25.65 FTE, are budgeted in special education, Resource 6500. Per Procedure 905 of the California Schools Accounting Manual:

A school psychologist, under contract to serve all students, spends time doing assessment testing for special education children with existing individualized education programs (IEPs). If the salary is partially paid with special education money, the documentation of salaries split among resources will also support the split among goals. If the psychologist is paid solely with state unrestricted money but the LEA wishes to directly charge this cost among goals, then those charges must be supported by time reports, calendars, or other documentation substantiating the actual time spent on the multiple goals.

Recommendations

The district should:

1. Review in detail all expenditures charged to Resource 6500 before the close of the fiscal year. Ensure that charges to special education resources are appropriate and comply with all state and federal regulations.
2. Review the state-approved listing of nonpublic schools and agencies and charge any services rendered by vendors not on the list to object code 5800.
3. Review contracts with nonpublic schools to ensure that services that are applicable as nonpublic agency services are coded properly.
4. Review vendors charged to nonpublic agency object codes; ensure they are applicable to special education.
5. Ensure that charges for students transported to and from school are charged to the appropriate resource and reported correctly in the SACS software.
6. Review the work done by district psychologists against CSAM Procedure 905 to determine that the current coding split is valid and compliant.

Preschool Programs and Placements

Students ages 3 and 4 accounted for 5.8% of Elk Grove’s special education students averaged over the past three years. The average percentage of preschool age students identified for special education in comparable districts by size in the same time period was 5.4%.

Statewide, over the past three years, students ages 3 and 4 accounted for an average of 6% of the special education population, placing the district within the statewide average.

Percentage of special education population ages 3-4 in comparable districts

School Year	Elk Grove	Fresno	Santa Ana	San Bernardino	California
2006-07	6%	5%	8%	3%	6%
2007-08	6%	5.2%	8%	3%	6%
2008-09	5.4%	5.2%	8%	2%	6.1%

Source: CASEMIS

The district received 700 preschool referrals in 2008-09 compared with 457 in 2007-08, a one-year increase of 203 referrals. Students were assessed at their home school for speech and at the assessment center when more intensive testing was needed. Referrals for the preschool programs are processed systematically with referral packets sent to the parents prior to assessment. The number of students enrolled in the preschool programs has stayed fairly level, despite the significant increase in referrals.

Preschool classes are located at four sites and are neither centrally nor regionally located. There is one center for assessment and one site for intensive speech services. The intensive speech site is located away from the area in which most of the referred children reside. Students are bused to this center from all other regions. The district also provides an inclusion program at a Head Start center. However the Head Start program is also located some distance from where most of the Head Start students live.

Preschool classes do not use the same curriculum, the bell schedules of the classes are not coordinated, and the names of the programs differ. Although the district attempts to place the students in the most appropriate class, staff reported that parents “shop around” for the program that best meets the parent’s schedule or because of a perception that one program is better than another. The accuracy of this information was not verified, but it was reported by several different staff members as the prevailing perception.

Staff also reported that many students are transitioned at age 3 into the district with intensive services identified on the Individual Family Service Plan (IFSP). The district has no

control over what occurs in the infant program and therefore inherits expensive private services. It is difficult to either reduce the amount of these private services or transfer responsibility for these services to district providers during the IEP to transfer the preschool student from the infant program to the district. As discussed earlier in this report, becoming a vendor with the Regional Center will enable the district to develop defensible programs for preschoolers and reduce the reliance on NPSs and NPAs.

Numbers and percentages of students by category ages 3-4 in the district

School Year	Autism	Speech	Mental Retardation	Other Categories	Total
2006-07	49/16%	220/72%	15/5%	21/7%	320
2007-08	63/19%	207/64%	15/5%	44/14%	335
2008-09	73/23%	193/64%	14/5%	21/7%	333

Source: CASEMIS

Recommendations

The district should:

1. Continue monitoring the number of preschool students in comparison to state averages.
2. Align the preschool classes' hours and names to reduce the incidence of parent "shopping."
3. Locate the preschool classes throughout the district to reduce transportation costs and educate students closer to their home schools.
4. Develop additional preschool classes to meet the needs of the students receiving NPS and NPA services and to reduce the reliance on private vendors.
5. Develop other opportunities with Head Start to include students at other sites to reduce transportation costs and educate students closer to their home schools.
6. Develop a vendor program with regional center to meet the needs of the infant-toddlers which will reduce the reliance on NPAs.

Special Education Transportation

The district provides transportation services for both regular education and special education students based on eligibility criteria specified in the district's board policies and administrative procedures, and IEPs.

The transportation program provides various transportation services to all 62 of the district's school sites and to additional nonpublic programs, according to a review of the district's bus routes. To accomplish the district's current special needs transportation requirements, 74 special education school bus routes transport approximately 1,149 students, according to data provided in transportation documents.

The transportation program has implemented an internal district form, Transportation Supplement to IEP, which helps ensure that, as special education students are scheduled for transportation, this service is verified in their IEPs. The Transportation Supplement to IEP form identifies the type of transportation service needed as well as the medical and behavioral issues of the student. The form assists greatly in ensuring that the student is transported in the least restrictive environment and provides transportation staff the necessary pertinent information needed to safely and effectively transport the student

The district has implemented a multitrack calendar for its 39 elementary schools, and follows a traditional single track for its nine middle and nine high schools. A large majority of the district's special needs students that receive transportation services are scheduled on either Track A for elementary-aged students or the district's traditional single track for middle and high school students. According to data reviewed and provided by transportation staff, approximately 222 elementary school special needs students receive transportation as a related service on Track A, and 795 special needs students are scheduled on the district's traditional single track for all middle and high schools. However, an additional 89 elementary special needs students receive transportation on tracks B, C and D. An additional 43 special education students receive transportation to year-round programs on all calendar tracks.

The transportation program has implemented computerized routing and optimization software to assist in managing the special education and regular education transportation support. The district does not have formal policy specific to student transportation ride time. In general, overall ride times in the district are satisfactory, with the average loaded ride time of students at 54 minutes daily. However, data identified by the transportation staff on the Bus Metric Data Report show that the district has a maximum ride time of as much as 145 minutes (2 hours, 25 minutes) daily.

Ride times may be a bit excessive due to the placement of pre-K programs throughout the district and the lack of standardization that would allow pre-K students to attend the program closest to their home. In addition, the approximately 160 students attending the

Jessie Baker site located in the southern area of the district may have some bearing on the district's overall ride-time statistics. However, the greatest impacts on the district's ride-time statistics are the routes that transport students to nonpublic programs outside the district's geographic boundaries.

The cost of the transportation program's special education routes and its per-pupil cost are within an acceptable range based on similar reviews performed by FCMAT. According to source data provided by transportation department staff, the cost to the district is \$438.58 per route with an average daily cost per rider of \$28.25. This data is in line with the district's state TRAN data reported to the California Department of Education annually.

Based on 1,149 special education students transported on 74 dedicated special education school buses, the district is operating at a load factor of 15.52%, among the highest FCMAT has reviewed in the state. Load factor is the total number of students divided by a district's total number of routes. The load factor at Elk Grove USD indicates highly efficient routing. To some degree, the district's multitrack calendar for its elementary-age students plays a significant role in the high percentage, but given the geographic size of the district, traffic patterns and cross-assigned pre-K and Jessie Baker students, the transportation staff is doing a very effective job scheduling special education students.

Transportation Services for the Jessie Baker School

Jessie Baker School is located in the southernmost part of the district. Long ride times for students are evident, with an average of 58 minutes and a maximum of 110 minutes daily. However, because Jessie Baker School has a later morning start time and later afternoon dismissal than other district schools, the transportation program has been able to assign 17 morning routes. Buses that complete their morning assignments at other school sites can pick up a few students in their general locale and take them to the Jessie Baker School. Three buses are assigned for mid-day transportation to Jessie Baker, with only seven needed for the afternoon return routes.

The district would not necessarily eliminate buses for those students attending the Jessie Baker School if the students were reassigned to other sites throughout the district, because Jessie Baker students require transportation support as a related support service. However, ride times would certainly be reduced by having students attend programs that are assigned to each region. In addition, there would be some operational savings from fewer miles driven and fewer labor hours expended. Student ride times would probably be substantially reduced.

According to source data provided by the transportation staff found on a Bus Metric Data Report for the Jessie Baker School, it costs the district \$216.46 per route with a student cost of \$16.55. With 27 routes and a daily single route cost of \$216.46, the daily total cost is \$5,844.

Recommendations

The district should:

1. Examine the potential for reducing transportation special education student ride times and a potential reduction in vehicle operational expenses by assigning special education students to appropriate programs nearest their homes to save on transportation costs and promote the least restrictive environment for the students.
2. Examine the benefits of shorter ride times and operational cost reductions if students attending the Jessie Baker School were decentralized to locations throughout the district.

Pre-K Transportation Support

For the purpose of continuity and matriculation, the district has established nine regions within district boundaries. Each region is designed around one of the district's nine high schools and nine middle schools with feeder elementary schools in the general geographic area. However, while the design is probably beneficial for the district's general education population, the regions are not generally adhered to for the assignment of special education students. It is important to note that, to a large degree, it is not reasonable to expect that each of the nine regions within the district will have individual programs for every special needs student. Specialized programs are determined by the population of students needing such programs. Facilities availability also plays a large role in program placement.

The district transports 86 pre-K students in the morning and 88 students in the afternoon. FCMAT noted through examination of student data and transportation routing that numerous examples exist of pre-K students being transported well outside their home school area or region for placement at a program site elsewhere in the district. In reviewing the district's seven pre-K program sites, it became evident that there is only one pre-K site on a district campus west of State Route 99, yet a large majority of the district's pre-K students live in that area, known as Laguna. The district should review the home addresses of the current pre-K population to best determine where to place pre-K facilities. This would keep these students closer to their homes, cut ride times and reduce transportation costs.

Review of the district's special education bus routing shows that most of the routes are dedicated pre-K bus routes. According to transportation staff, many of the district's pre-K students do not attend the pre-K program closest to their home, or in some cases, do not even attend the closest pre-K program within their district region. Combined with the staggered bell schedules of programs across the district, dedicated routes must be designed to meet the transportation demand of many of the district's pre-K students. As

noted earlier, assigning pre-K students to programs closest to the student would reduce both operational expense and student ride time. In addition, a reduction in overall pre-K assigned school bus routing may be achieved through this efficiency. However, both space availability in pre-K programs and parent choice affect this situation.

Recommendations

The district should:

1. Review the number of pre-K students residing west of State Route 99 to determine whether the district should increase or relocate additional pre-K program sites in that area to best serve the pre-K student population.
2. Review the assignment of students in their pre-K programs to ensure they are assigned to the program closest to their home and within their region of the district.
3. Study the possibility of reducing transportation expense or eliminating buses dedicated to the district's pre-K student population if students are reassigned to pre-K programs closer to their homes.
4. Closely examine the potential for transportation savings of more than \$64,000 by eliminating the two noncentralized phonological speech and language programs and providing services to these students at their assigned pre-K program sites.
5. Consider more centralized sites to house the district's pre-K phonological speech and language program as a way to reduce transportation expenses and student ride times.
6. Review potential cost savings by increasing the regionalization of special education programs, specifically the locations of the seven existing pre-K program sites.

Facilities for Program Relocation

The district does not have sufficient specialized programs available for students currently placed in an NPS, and when classes are available they are not located in all regions of the district. In past years, there were few if any facilities available for new program development. However, this is no longer the case. Although the number of classes for students with emotional disturbance and autism increased this year, there are still insufficient programs to meet the district's needs. Without the development of new programs, the district will have to continue to rely on NPSs and NPAs.

FCMAT reviewed program locations within regions rather than at each school within a region. As seen in the table below, programs are not available in all regions. This table enables the district to determine which regions currently house programs and which regions need program development. Some programs, such as Independent Living Skills (ILS), Functional Living Skills (FLS) and Supporting Living Skills (SLS) may not be needed everywhere. Also, low-incidence programs, such as those for the hard of hearing, were not included in this table.

Availability of specialized programs in each region by grade level

	Cosumnes	Elk Grove	Florin	Franklin	Laguna	Monterey	Pleasant Grove	Sheldon	Valley
Preschool									
Autism	N/A	3	0	0	0	0	0	0	0
MM	N/A	1	0	0	1	0	0	2	0
Elementary									
ED	N/A	0	0	1	0	2	1	1	2
Autism	N/A	0	0	0	0	0	6	0	0
ILS	N/A	2	1	0	0	1	0	1	0
FLS	N/A	0	0	0	0	0	0	0	2
SLS	N/A	0	0	2	0	0	0	0	0
Middle									
ED	0	1	1	0	1	0	1	1	0
Autism	0	0	0	0	0	0	0	0	0
ILS	0	1	0	0	1	1	0	0	1
FLS	0	0	0	0	0	0	0	0	0
SLS	0	0	0	0	0	1	1	0	0
High									
ED	0	1	2	0	1	2	2	2	2
Autism	0	0	0	0	0	0	0	0	0
ILS	0	0	1	2	0	3	1	0	0
FLS	1	0	1	0	1	0	0	0	0
SLS	0	0	0	0	0	0	0	0	0

Source: District data

Recommendations

The district should:

1. Determine whether sufficient numbers of students are transported from one region to another to merit either moving classes to the region where most students reside, or opening additional classes.
2. Determine in which region(s) students placed in nonpublic schools reside and which of these students could attend a district program if one were available; develop programs accordingly. If there are not a sufficient number of these students in a region, develop the program where the majority of the students reside to reduce transportation.

Appendices

Appendix A - Study Agreement

Appendix B - Procedures for Requesting Additional Paraeducator Support

Appendix A



FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
July 31, 2009

The FISCAL CRISIS AND MANAGEMENT ASSISTANCE TEAM (FCMAT), hereinafter referred to as the Team, and the Elk Grove Unified 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 Elk Grove Unified School District operations. These professionals may include staff of the Team, County Offices of Education, the California State Department of Education, school districts, or private contractors. All work shall be performed in accordance with the terms and conditions of this Agreement.

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

The scope and objectives of this study are to conduct a review of the District's Special Education program and services, as follows:

- 1) Review the efficiency of staffing allocations of para-educators working with the mild/moderate population, as well as serving autism programs. Analyze current procedures for identifying the need for instructional aides, the process for monitoring the resources for the allocation of para-educators and determining the ongoing need for continued support from year to year. Provide recommendations for improvement, if applicable.
- 2) Analyze the increasing costs for Nonpublic School Placement and Non Public School Agencies and provide recommendations to reduce or contain costs. Compare and contrast the costs for Nonpublic School Placements in the District with the statewide average and districts of comparable size.

- 3) Examine the efficiency and effectiveness of the inclusive education program and increased reliance on nonpublic agency support for students. Provide recommendations for improvement, if applicable.
- 4) Review the efficiency of speech and language services and other DIS services, including, but not limited to school psychology, occupational therapy, physical therapy, adaptive PE., and nursing. Determine the extent to which there is a duplication of services, the use of entrance and exit criteria, staffing caseloads etc. Provide recommendations for improvement, if applicable.
- 5) Review the efficiency and effectiveness of operating a Self Contained Special Education center for students with cognitive delays in a segregated site and provide recommendations for improvement and/or alternative program options, if applicable.
- 6) Analyze the recent 20% increase in the severely handicapped population and provide guidance on cost containment while maintaining quality services.
- 7) Review the current organizational structure of the special education department and provide recommendations to contain costs and ensure clerical, program and administrative support, if applicable.
- 8) Examine all special education caseloads and staffing ratios and provide recommendations to reduce increasing costs.
- 9) Examine fiscal coding of all special education program revenues and expenditures and provide recommendations that will be more appropriate regarding coding sections, if applicable.
- 10) Examine preschool programs and placement of locations within the district.
- 11) Review the special education transportation delivery system. Specifically, review the transportation delivery system of the self contained special education center, and provide recommendations for transportation services that would be in place if many of the severely handicapped students were to be served in neighborhood schools, instead of transported to the center. Review Project Ride and riding therapy programs and provide recommendations that would ensure more effective and efficient services.
- 12) Review the facilities in the district and provide recommendations on whether it would be feasible to relocate programs and increase the number of regional programs operated within the district.

B. Services and Products to be Provided

- 1) Orientation Meeting - The Team will conduct an orientation session at the District to brief District management and staff on the procedures of the Team and on the purpose and schedule of the study.
- 2) On-site Review - The Team will conduct on-site meetings at the District office to gather documentation and conduct interviews. The Team will request assistance from the District in setting up interview schedules with staff.
- 3) Progress Reports - The Team will hold an exit meeting at the conclusion of the on-site reviews to inform the District representatives of significant findings and recommendations to that point.
- 4) Exit Letter - The Team will issue an exit letter approximately 10 days after the exit meeting detailing significant findings and recommendations to date and memorializing the topics discussed in the exit meeting.
- 5) Draft Reports – An electronic copy of the preliminary draft report will be sent to the District administration for review and comment.
- 6) Final Report – An electronic copy of the final report will be sent to the District following completion of the review. Up to 15 hard copies of the report will be sent to the District, if requested.
- 7) Follow-Up Support – Six months after the completion of the study, FCMAT will return to the District, if requested, to confirm the District’s progress in implementing the recommendations included in the report, at no additional 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, 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 Special Education Consultant
- C. Anne Stone, FCMAT Special Education Consultant
- D. Two TBD FCMAT Special Education Consultants

- E. Timothy Purvis, FCMAT Transportation Consultant
- F. Michael Rea, FCMAT Transportation Consultant
- G. Linda Grundhoffer, FCMAT Fiscal Consultant
- H. TBD FCMAT Facilities Consultant

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

4. PROJECT COSTS

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

- A. \$500.00 per day for each Team Member, while on site, conducting fieldwork at other locations, preparing and presenting reports, or participating in meetings.
- B. All out-of-pocket expenses, including travel, meals, lodging, etc. Based on the elements noted in section 2 A, the total cost of the study is estimated at \$47,000. The District will be invoiced at actual costs, with 50% of the estimated cost due following the completion of the on-site review and the remaining amount due upon acceptance of the final report by the District.
- C. Any change to the scope will affect the estimate of total cost.

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

5. RESPONSIBILITIES OF THE DISTRICT

- A. The District will provide office and conference room space while on-site reviews are in progress.
- B. The District will provide the following (if requested):
 - 1) A map of the local area
 - 2) Existing policies, regulations and prior reports addressing the study request
 - 3) Current organizational charts
 - 4) Current and four (4) prior year's audit reports
 - 5) Any documents requested on a supplemental listing
- C. The District Administration will review a preliminary draft copy of the study. Any comments regarding the accuracy of the data presented in the report or the practicability of the recommendations will be reviewed with the Team prior to completion of the final report.

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

6. PROJECT SCHEDULE

The following schedule outlines the planned completion dates for key study milestones and is subject to the availability of proposed Team members:

Orientation:	Estimated October 19 or October 26, 2009
Staff Interviews:	Estimated October 19-23 or October 26-30
Exit Interviews:	at the conclusion of the on-site fieldwork
Preliminary Report Submitted:	approximately six weeks after the exit interview
Final Report Submitted:	to be determined
Board Presentation:	to be determined
Follow-Up Support:	If requested

7. CONTACT PERSON

Please print name of contact person: Richard Odegaard, Associate Supt.

Telephone 916 686-7744

FAX

Internet Address rodegaar@egusd.net

Steven M. Ladd, Ed.D. Superintendent
Elk Grove Unified School District

Date

Barbara Dean

July 31, 2009

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

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

