



Grossmont Union High School District

Management Review

July 9, 2008



June 9, 2008

Robert Collins, Ed.D., Superintendent
Grossmont Union High School District
1100 Murray Drive
La Mesa Ca 91944-1043

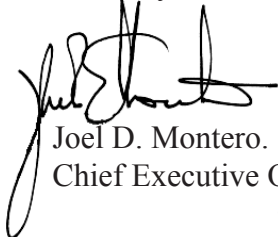
Dear Superintendent Collins:

In March 2008, the Fiscal Crisis and Management Assistance Team entered into an agreement with the Grossmont Union High School District for a review in which FCMAT would perform the following:

1. Conduct a comprehensive review of the structure and management of the district's Special Education Program including the following areas:
 - a. Identification of students,
 - b. Staffing,
 - c. Class sizes and caseloads,
 - d. Transportation services, and
 - e. All other pertinent factors
2. Provide recommendations that, if implemented, will enable the district to reduce costs while maintaining legally required services. If possible, the district requests that the study and recommendations be completed in time to implement changes in fiscal year 2008-09.

FCMAT visited the district April 29 through May 2, 2008 to collect data, review information and interview staff members. This report is the result of that effort. We appreciate the opportunity to serve you, and please give our regards to all the employees of the Grossmont Union High School District.

Sincerely,



Joel D. Montero.
Chief Executive Officer

FCMAT

Joel D. Montero, Chief Executive Officer

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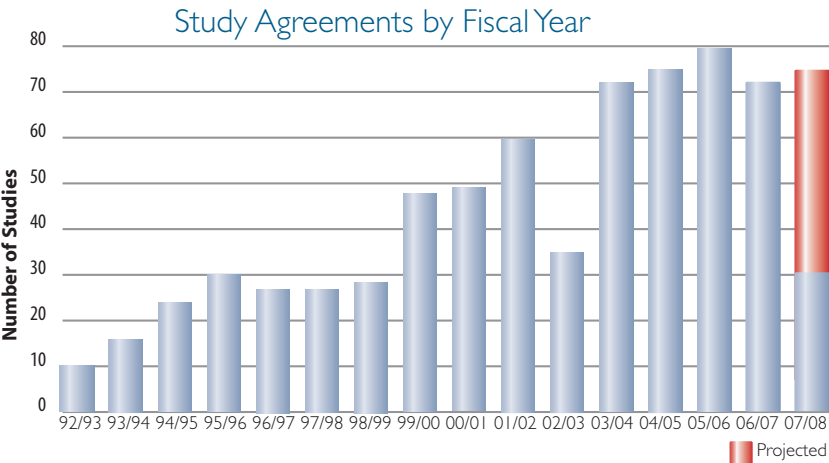
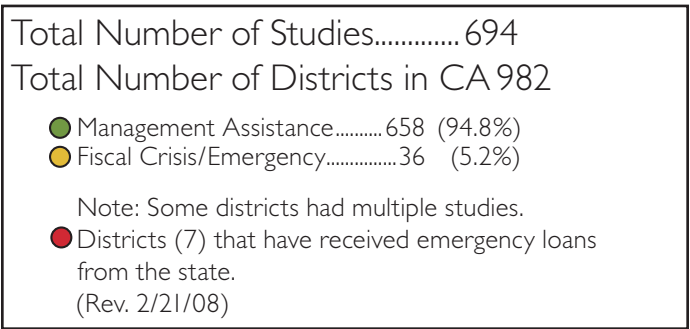
Foreword

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 in complying with fiscal accountability standards.

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

Since 1992, FCMAT has been engaged to perform nearly 700 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.



Introduction

Background

Located in La Mesa in southeast San Diego County, the Grossmont Union High School District serves the communities of El Cajon, La Mesa, Spring Valley, Santee, Alpine, Jamul-Dulzura and the surrounding unincorporated areas. The district is composed of the following schools:

- Grossmont High School
- Helix Charter High School
- El Cajon Valley High School
- Mount Miguel High School
- El Capitan High School
- Granite Hills High School
- Homestead High School
- Monte Vista High School
- Santana High School
- Valhalla High School
- West Hills High School
- Steele Canyon High School
- Phoenix High School
- Grossmont Middle College High School
- Chaparral High School
- Gateway Community Day School
- Gateway West High School

Over the past four years, the district's enrollment has declined, but the portion of the student population that receives special education and related services has remained at approximately 13.8 percent. This exceeds the statewide average of 10.81%. There is a general concern that the district overidentifies students for special education.

In March 2008, the district entered into a study agreement that requested the Fiscal Crisis and Management Assistance Team (FCMAT) to complete the following:

1. Conduct a comprehensive review of the structure and management of the district's special education program including the following areas:
 - a. Identification of students
 - b. Staffing
 - c. Class sizes and caseloads
 - d. Transportation services, and
 - e. All other pertinent factors

2. Provide recommendations that, if implemented, will enable the district to reduce costs while maintaining legally required services. If possible, the district requests that the study and recommendations be completed in time to implement changes in fiscal year 2008-09.

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.

Study Team

FCMAT visited the district April 29, 2008 - May 2, 2008 to collect data, review information and interview staff members. This report is the result of that effort and is divided into the following sections:

- I. Executive Summary
- II. Program Efficiency
- III. Transportation Efficiency
- IV. Communication
- V. Program Delivery Model
- VI. Program Options
- VII. Homestead High School
- VIII. Instructional Practice

Executive Summary

The Grossmont Union High School District is one the largest high school districts in California. The district is experiencing significantly increased general fund contributions to special education.

The district has little or no control over the process of identifying students as eligible for special education services. Nearly 98% of the district's ninth grade special education students come from feeder districts and are transferring their IEP to the high school. Because of this, the district has a higher percentage of students in special education than the statewide average. In addition, the number of incoming ninth-grade special education students has increased by 308 from the 2007-08 school year, to 1,037.

The IEP forms used by the district are different from those used by its feeder districts, requiring the completion of new IEP forms. Student information is also entered into the Web Integrated Special Education Resources (WISER), though the student data is already in the SELPA's Web-based IEP system. These processes are time-consuming and duplicate work.

The cost for the Web-based IEP system used by the SELPA is \$495 per year and \$4.95 per special education student. The district's total cost for this system in 2007-08 will be approximately \$15,650.

Administrators and staff members who are responsible for representing the district at potentially contentious IEP meetings are not trained in facilitated IEPs, conflict resolution or alternative dispute resolution. This training provides techniques to resolve disagreements before the problem progresses to a formal due process hearing.

A total of 138 district students attend a nonpublic school (NPS) at an approximate cost of \$6,367,688 for the 2007-08 school year.

The district and the SELPA have several alternative programs for special education students, but they are usually full and do not offer a comprehensive range of program options. Thus, when a student enters the district with an active IEP for NPS, continuing in the NPS is the only alternative.

Seven of the district's nine students in nonpublic agencies receive NPA nursing/health services. It is often difficult for districts to hire in-house nurses, and the need for nursing services can vary greatly from one year to another.

The district operates 54 school bus routes, 41 of which are exclusively for the special education program. Of the 13 routes for the general education program, 12 include a special education component. A total of 851 special needs students receive district transportation. The district provides transportation for community and vocational/workability programs, which is rare and costly because of the intensive scheduling required.

Communication and cooperation between the transportation and special education staff and departments is poor. The Special Education Department does not routinely include transportation staff members in meetings regarding students coming from feeder schools. As a result, the Transportation Department is often caught by surprise when students entering the district need specific transportation services. Better communication and understanding are needed at all levels between these departments; the leadership of the transportation and special education departments should communicate with each other regularly.

Different program delivery models are implemented at each of the district's comprehensive high schools, ranging from traditional to collaborative and full inclusion. These models are not consistent at every site, which may lead to noncompliance in the delivery of special education services. The staff believes that new program delivery alternatives are needed to achieve efficiency and effectiveness while maintaining cost efficiency. However, the district has not formed teams or committees to address the need for alternative delivery models, and there is no strategic plan to address future program delivery models. A key aspect of successful program delivery is the collaborative effort of all the departments and school sites, not just the Special Education Department.

It is crucial that the district consider cost efficiency when analyzing program delivery models. Special education costs continue to increase, and this is exacerbated by the district's declining ADA. The district should analyze how to provide quality programs with less financial impact.

There are indications that some case loads could be redistributed to maximize resources. The district has maintained a steady pool of instructional aides for the special education program. Contractual agreements limit the use of temporary aides to meet short-term needs and prohibit the adjustment of aide hours from full time to part time. These constraints hinder effective program management.

The Special Education Department does not have a specific staff member who is responsible for reviewing the use of one-to-one aides, analyzing student needs and evaluating program effectiveness. As the costs of special education continue to rise, it may be possible to reduce the number of one-to-one aides to use resources more effectively.

The district lacks a defined, written process for analyzing program costs to justify special education expenditures and program needs. Cost effective program delivery requires consistent and significant collaboration among special education, human resources, educational services and business administrators. Administrators must understand special education services and budgets; all revenues and expenditures should be continually monitored.

Because of a lack of program options, placement in a nonpublic school or the district's Homestead school site are the only available alternatives for some special education students. As a result, many students with disabling emotional or behavioral conditions are placed in one of the most restrictive environments. These placements are costly and may deny students the opportunity for a free and appropriate public education or a placement in the least restrictive environment.

The district's Homestead High School, a separate site serving approximately 125 special education students, may not be an appropriate program placement for any student. The physical structure and educational environment do not meet the district's health and safety standards. The Homestead campus is remote and students are isolated from all nondisabled peers.

Homestead is expensive, with an annual budget of \$1,672,212, excluding transportation costs, and a general fund contribution of approximately \$1,269,211 per year. The district transports all 125 students to Homestead from locations throughout the district, which is also costly and requires four buses.

The district could create programs to serve current Homestead students at each of the district's comprehensive high schools, reducing transportation expenses. Decentralizing or regionally centralizing these programs could also allow the district to transport some Homestead students on existing regular education school buses and routes.

The district should immediately conduct a cost analysis to determine the savings that could result from creating self-contained classrooms for emotionally and behaviorally disturbed students on comprehensive high school sites instead of placing these students at Homestead High School. Grossmont Union should plan for the closure of the Homestead site by the 2009-10 school year, using 2008-09 as a planning year and possibly as a time to transition some students to alternative district programs. A plan should be developed to transfer Homestead students to the newly developed classes at the comprehensive high school sites.

The district's special education administrators do not attend the transition IEP meetings, at which decisions are made regarding NPS placement. School site administrators routinely attend IEP meetings regarding discipline issues, but do not routinely attend all other IEP meetings. Instead, the district uses administrative designees, relying heavily

on retired staff members at an average annual cost of \$150,000. Because of the low attendance by administrators, there is a perception of a lack of ownership over special education at the school sites, yet there is no defined expectation for administrators in this regard. The district should ensure an appropriate level of administrative attendance and presence, increase expectations for administrators, and consider eliminating the use and cost of administrative designees.

Findings and Recommendations

Program Efficiency

As part of this review, FCMAT reviewed data from the California Special Education Management Information System (CASEMIS), the Web Integrated Special Education Resources (WISER) program, the number of students entering the district from feeder elementary schools and the number of students in nonpublic school placements and/or receiving nonpublic agency services.

California Special Education Management Information System

Analyzing the CASEMIS report's identification trends is an effective method of determining whether a district overidentifies special education students. This report is produced and submitted annually to the California Department of Education through the East County Special Education Local Plan Area (SELPA).

On December 1, 2007, the number of special education students from the Grossmont Union High School District was 3,036. The district ADA was 24,196 with 13.8% of students in special education. In 2006-07, the average percentage of special education students in the state was 10.81 %. The district average was greater than the state average by 3%, and this number has not significantly changed over the past three years.

This review compared the number of students in special education with the district's average daily attendance (ADA); special education students by grade; students initially placed in the program, those continuing and those leaving; and students in various special education eligibility categories.

Only 15 of the 1,037 ninth-grade students reported on December 1, 2007 were new special education referrals initiated by the district. Therefore, 98.5 % of ninth-grade special education students were incoming, identified eighth graders or students who moved to the district during the first semester of 2007-08 with an IEP. This is an increase of 308 students from the 2006-2007 school year. The following table indicates that although the number of special education students decreased in grades 10-12, the total number of students in special education did not significantly decrease.

Comparison of Special Education Students in the Same Grade

Grade	2005	2006	2007	Increase/Decrease
8	1	0	4	+ 4
9	719	729	1,037	+308
10	754	704	644	- 60
11	713	755	697	- 58
12	666	747	509	- 238
Other/	208	137	145	+ 8
Total	3,061	3,072	3,036	- 36

It is also important to compare the same group of students from one grade to the next. The data in the following table indicates a decrease in the number of special education students in the 2006-2007 school year. (Current year data will not be available until July 2008).

Comparison of Special Education Students from 2006-2007 by Grade

Grade	2006	Grade	2007	Increase/Decrease
9	729	10	644	- 85
10	704	11	697	- 7
11	755	12	509	-246

According to the CASEMIS report, 338 district students left special education during the 2006-07 school year for the following reasons:

- 18 students returned to regular education.
- 131 students moved.
- 27 students dropped out.
- One student died.
- 325 students graduated with a diploma.
- 13 students received a certificate of completion.
- 14 students reached maximum age.

The difference between the total number of incoming and exiting students is not significant and therefore, the total number of special education students has not declined. The data indicates that the district has not overidentified new special education students but also has not transferred a significant number of students from the program. Only .5% of special education students were transferred to regular education, and the majority moved or graduated with or without a diploma. The number of students who received a diploma included those that received a waiver or an exemption. Since exemptions are no longer allowed, it is unknown how many current special education seniors will continue in special education for one to two years to access the required support to pass the California High School Exit Exam (CAHSEE). These continuing students will increase the total number of special education students and the costs of special education.

The CASEMIS was reviewed to determine the number of students in each of the eligibility categories and any district trends. The following table compares the number of students by eligibility category and is consistent with statewide trends of increased numbers of specific high cost disabilities. This trend requires long-range planning to develop efficient cost-effective programs that meet the intensive needs of students who are autistic, brain injured, emotionally disturbed, or have other health impairments.

Comparison of Number of students by Eligibility Categories

Eligibility	2005	2006	2007	Increase/Decrease From 2006-2007		2007 % in District	2007 % in State
Speech and Language	284	303	279	-24	-8%	9%	26%
Emotionally Disturbed	354	314	296	-18	-6%	9.7%	4.01%
Specific Learning Disability	1487	1450	1393	-56	-4%	46%	44%
Other Health Impaired	381	426	457	+31	+7%	15%	6.97%
Autism	96	123	154	+14	+25%	5%	6.81%
Traumatic Brain Injury	15	11	14	+ 3	+27%	.46%	.26%

The number of district students with the least involved disabilities and less costly services is decreasing and is less than or close to the percentage statewide. The number of students with the most involved disabilities and the most costly services is increasing. The only exception is emotionally disturbed students. However, many students at nonpublic and alternative schools do not appear to be eligible for services for the emotionally disturbed, yet require that level of programming.

Recommendations

The district should:

1. Analyze trends in CASEMIS reporting to perform long-range planning for the development of efficient cost-effective programs that meet the intensive needs of students with autism, traumatic brain injury, emotional disturbance or other health impairment.
2. Closely examine exit rates and explore options for students to complete the course of study and requirements for a high school diploma.
3. Anticipate the need for continuing students to remain in educational programs since exemptions are no longer allowed for CAHSEE requirements.
4. Maintain open communication with the Business Department regarding the potential increase in the number of students in special education and subsequent costs for providing programs through the age of 22 for students who are unable to complete the course of study for a high school diploma.

Web Integrated Special Education Resources

Web Integrated Special Education Resources (WISER) is the district's new Web-based IEP information system developed by a Special Education Program Specialist and the Instructional Technology Department. The SELPA uses a different Web-based IEP information system. WISER went into effect January 2008 and does not fully meet the requirements of a Web-based system in its current state. Data has been entered into the system for only about one fourth of the students and will not be completed until January 2009. The system includes all the required IEP forms and CASEMIS data. It also ensures

that all IEP areas are addressed and reduces the need for someone to manually enter CASEMIS data, a significant improvement over the district's former paper method. The data generated through WISER will have to be uploaded into the SELPA for CASEMIS reporting. The staff indicated that completing an IEP on the WISER is time-consuming, but this is common with any new Web-based IEP system.

The IEP forms used by the district are different from those used by the feeder districts. At the transition meeting for incoming ninth graders, a district team that includes the school's department chair and the school Psychologist must complete a new IEP and enter the student information into WISER. This is more time-consuming than the previous practice of completing a document referred to as an I-9 form and duplicates effort since the student data is already in the SELPA's Web-based IEP system.

The cost for continued maintenance of the WISER system is unknown. However, having a separate system will make the district responsible for monitoring and making any required changes from the CASEMIS and/or state or federal regulations on the IEP forms and in WISER. The cost for the IEP Web-based system used by the SELPA is \$495 a year and \$4.95 per special education student. The district cost for 2007-08 will be \$15,650, including making all the necessary form and CASEMIS changes.

Because the WISER is a separate system, the district cannot easily access the information from the SELPA system. The student's history is not available, the district cannot view incoming ninth grader IEPs during the year, and all student information must be entered when the student enrolls in the district. To ensure fiscal efficiency and accuracy in reporting identification rates, it is critical for the district to use a student information system that is integrated with the information systems of the SELPA and district.

Recommendations

The district should:

1. Consider changing from the WISER to the SELPA Web-based system. This would enable more accurate and timely sharing of information between the district and the feeder schools. IEPs for students attending an NPS, receiving NPA services or any other high-cost service could be monitored, and concerns could be more easily addressed. The cost for the SELPA system is a known amount and includes all required changes in forms and reporting.
2. Explore options for a student information system that is integrated with the district's information system.

Due Process

There is a perception that special education never denies requests that may be extremely costly, particularly if a parent advocate or attorney is involved. Of 10 district cases that involved the use of an attorney to represent the district, six were filed by parents, one was filed by the district and the rest were informal complaints. The basic issues center on requests for nonpublic school/agency services (7), compensatory services (2), and independent evaluation (1). Settlement was reached in six cases with students placed or continued in nonpublic school/agency services. The annual cost of attorney fees for district representation in due process cases was \$42,787.

These costs are not excessive based on the number of cases filed. The Special Education Department does not involve site administrators, transportation, or the Business Department in discussions that occur before due process and only rarely in the due process procedure. Therefore, the rationale used by the Special Education Department for a settlement is unclear.

Special education administrators, psychologists or other staff members who are responsible for attending and representing the district at contentious and potentially litigious IEPs are not trained in either facilitated IEPs, conflict resolution or alternative dispute resolution. All these programs provide techniques to resolve disagreements by reaching mutually acceptable solutions before the problem progresses to a formal due process hearing.

FCMAT could find no measurable evidence to either support or refute the perception that Special Education never denies requests for special education and related services that may be costly to the district, particularly if a parent advocate or attorney is involved.

Recommendations

The district should:

1. Involve site administration when there is a potential or actual due process filing regarding a student at their school site. Discussions should focus on the accuracy and completeness of the IEP, appropriateness of services that meet the needs of the student, alternatives that could be implemented at the site or in the district to resolve the dispute, the cost of any additional services, the cost of the services being requested in the due process, and litigation costs.
2. Conduct meetings monthly, or more frequently as needed, with administrators from the Special Education and Business departments to discuss all current and potential due process cases, the costs that could be incurred and any other cost issues.

3. Train special education administrators, psychologists, teachers and/or site administrators who attend difficult and potentially litigious IEPs in techniques such as facilitated IEPs, conflict resolution or alternative dispute resolution.
4. Review previous due process cases that focused on nonpublic schools or nonpublic agencies to determine what programs could be enhanced or what alternative programs could be developed so that the district can prevail when presented with a similar case.

Nonpublic Schools

The Business Department and the Special Education Department are concerned about the number of nonpublic school placements and the cost to the district. A total of 138 district students attend a nonpublic school, and the cost of these services is approximately \$6,367,688 for the 2007-08 school year.

The district has 29 students attending residential nonpublic school programs. The residential schools are located in both Southern and Northern California, Texas and Colorado. The IEP process that places a student in a residential program is coordinated with Mental Health Services through an interagency agreement. Mental Health recommends the placement, monitors it, and authorizes the Department of Social Services to pay for the residential portion of the placement. The district is responsible for the educational portion of the placement as well as for paying for the student to be transported to the facility. The district is also responsible for providing transportation and necessary expenses for parental quarterly visits to the child at the residential facility. The district has little control over which residential program a student attends. However, the district is responsible for ensuring that the educational portion of the IEP is being implemented and for recommending that the student return to the district when a district program is appropriate to meet the student's educational needs.

One-hundred thirty-eight students attend nonpublic schools in San Diego. The vast majority of these students entered the district with this placement on their IEP. Only nine students in nonpublic schools this year were placed in an NPS by the district. The other 129 enrolled in the district with an active IEP for a nonpublic school placement. These students either moved to the district or matriculated to ninth grade from a feeder district.

The district and SELPA have several alternative programs to offer students, however, these programs are usually full and do not offer a comprehensive range of program options. When a student enrolls in the district with an active IEP for nonpublic school, the only alternative is continuation in the NPS.

One Psychologist is assigned as case manager for all students placed in nonpublic schools. The psychologist attends all IEP meetings and is the liaison between the nonpublic schools and the district. Her case load limits the amount of time available to observe and fully assess students although observation and assessment are required before recommending that a student change placements. FCMAT found that a lack of district program options, limited assessment and observation time, and mental health residential placements contribute to the excessive number of district students that continue to attend a nonpublic school.

The district contracts with 21 nonpublic schools. Negotiations of rates for all nonpublic schools are performed through a cooperative effort between the San Diego SELPAs representing all districts in San Diego and the nonpublic schools. All the district's nonpublic school contracts are monitored by the East County SELPA to ensure that the negotiated rates are enforced.

In preparation for the 2008-09 school year, the Special Education Department learned that 24 incoming ninth-grade students attend a nonpublic school. Five students are in a residential placement, and six of the current 138 students will graduate with an additional eight students receiving a certificate. However, these eight students are not of maximum age and could continue their education with the district.

As the following table shows, the number of district students attending a nonpublic school is significantly higher than the state average according to 2005-06 state data (the most recent available). In the table, the total number of students attending a nonpublic school is divided by the district ADA and converted to the number of students per thousand. This number is compared to the statewide average. The difference is more pronounced when the projected number of nonpublic school students is compared to the current ADA. If the district ADA decreases, this number will be even greater.

Statewide vs. Districtwide average of Nonpublic School Placement

	2007-2008	2008-2009
Number of Grossmont students attending nonpublic schools	138	149 (projected)
District ADA	24,196	24,196
NPS ADA per 1000	5.70	6.16
Statewide Average	3.25	3.25
Difference from Average	2.45	2.91

Recommendations

The district should:

1. Review and revise as needed every IEP for a nonpublic school placement to ensure that the IEP is designed to prepare the student to return to a district program.

2. Develop a committee that includes school psychologists, special education administrators, site administrators, related service providers including transportation, mental health representatives as appropriate, to review every nonpublic school placement, including residential placements. The committee should be charged with the following:
 - a) Reviewing case files and determining which students should be observed and assessed for immediate return to a district program.
 - b) Determining which students could be transferred to a district program if additional services or supports were in place and what those additional services or supports should be, including specific costs and potential cost savings.
 - c) Determining which students have similar ages and IEP requirements that would enable them to be grouped in district programs that are not available at present. Specific program needs would be identified, including the site or classes where the programs would be located, other facility needs, staffing including teacher and aid support, and related services including transportation. Specific costs and potential cost savings per student should be calculated.
3. Ensure that a representative of the district Special Education Department and the nonpublic student's home school or a district alternative school attend any IEP meeting that includes planning for the student's return to the district.

The SELPA should:

1. Form a committee that includes representatives of elementary districts and Grossmont Union to perform the following:
 - a) Review all current K-8 nonpublic school placements to determine whether it is more cost effective and educationally beneficial to continue placing students in nonpublic schools or develop regionalized programs.
 - b) Review potential nonpublic school placements to ensure that students are served in the least restrictive environments and that a nonpublic school is considered only when no other options are available.

Nonpublic Agencies

Nine students receive services through nonpublic agencies, but this number will increase to 11 in the 2008-09 school year. Seven of the nine students receive nonpublic agency nursing/health services, four students are at Helix Charter High School and three are at the Viking Center. It is often difficult for districts to hire in-house nurses, and the need for nursing services can vary greatly from one year to another.

Two autistic students receive nonpublic agency services, and two students with similar needs will transition to the district in the 2008-09 school year. Nonpublic agencies that provide these types of services for autistic students are expensive, and it is often difficult to transfer these services to the district even if it has an established program. The specific level of NPA services was not available for the two incoming students, but it can be assumed that the district's costs will increase based on what these agencies typically charge.

Recommendations

The district should:

1. Review IEPs that include NPA/LVN services, to determine which could be provided by a district hired LVN. Factors include the age of the student and the number of years the services would be required, the level of training that the LVN would need, and the ability to provide a substitute when the LVN is absent. Other factors include whether more than one student could be served by an LVN if he or she were a district employee, and the likelihood that the LVN could be used for other students when a current student leaves the district.
2. Continue contracting for LVN services when these services are temporary or require a level of training and licensure that would be difficult for a district employee to maintain.
3. Review nonpublic agency services being provided for autistic students and determine which could be provided by either current district personnel or newly hired and trained personnel. The district should develop a transition plan to transfer services that can be provided by the district and continue with nonpublic agency services until all services can be successfully transitioned.

The SELPA should:

1. Form a committee to review autism services provided by a nonpublic agency to elementary (K-8) students. This committee should determine which services could be provided by a district or a regionalized program.

Transportation Efficiency

The district operates 54 school bus routes, 41 exclusively for the special education program and 13 to provide home-to-school transportation for the general education program. However, 12 of the district's 13 general education routes also include a special education component. According to data from the district's transportation records, 851 special needs students receive district transportation; 734 are transported to district programs at district sites, and the remaining 117 are transported to other nonpublic placements outside the district.

As of April 30, the Transportation Department accumulated 751,192 miles for home-to-school general education and special education on district buses. This does not reflect additional mileage for large extracurricular field and athletic trips. The district has an extraordinarily high number of mid-day shuttle transportation services for special education, and this accounts for a high percentage of the total special education transportation mileage. Transportation is also provided to nontraditional identified students, resulting in higher-than-expected mileage and expense.

Shuttle Routes (Mid-Day Transportation Runs)

The district transportation program provides a significant number of mid-day shuttle runs for special education and other student programs such as the following:

Accumulated mileage for mid-day shuttle runs

District Program	Accumulated Mileage 07-08	Shuttle Mileage %
Community	2,194	5%
Therapy Runs	7,254	17%
Site to Site	14,635	34%
ROP	2,773	6%
Vocational/Workability	16,586	38%
Total	43,442	100%

The district provides transportation for community and vocational/workability programs. Providing this level of transportation is rare and costly because of the intensive type of scheduling required of the transportation staff. As of the date of fieldwork, the district's shuttle service mileage was 43,442. Community and vocational/workability programs accounted for 18,780 or 43% of the total mid-day shuttle mileage at a cost of \$74,369.

Significantly contributing to this expense is the long-time practice of providing transportation to students in Small Group Individualized Instruction (SGII). Students from throughout the district attend the SGII program, which is located at the district's Homestead High School site. Ten students are transported separately from the general population of students being transported to the Homestead site on late-in or early-out mid-day shuttle service school buses. These students do not necessarily attend the

program concurrently. Scheduling this type of service within the limitations of the district's collective bargaining unit contract is difficult for the transportation staff. Many districts do not provide transportation for programs such as SGII.

As of the date of fieldwork, the district's therapy run had accumulated 7,254 miles, which is 17% of the district's total mid-day shuttle service mileage. Approximately 96 students are transported at various times throughout the middle of the school day. Although special education therapy transportation scheduling is difficult because of individual appointment schedules, the high amount of mileage that occurs on mid-day shuttles suggests that there is little coordination between the Transportation and Special Education staffs to minimize duplication of effort. The staffs should communicate with each other to determine the most efficient and effective schedules that allow for the simultaneous transportation of several students to therapy appointments.

Recommendations

The district should:

1. Critically examine the benefits and expense of providing school bus transportation services for the community and vocational/workability programs.
2. Examine the benefits and expense of supporting the district's SGII program.
3. Implement regular and ongoing discussions between transportation scheduling staff and special needs staff to allow for better coordination of student therapy schedules.

District School Site Bell Schedule

As indicated in a FCMAT transportation report issued in May 2004, the district's schools appear to have complete autonomy in developing their bell schedules. The Transportation Department is usually not consulted before schedules are modified.

By centralizing and more efficiently staggering its bell schedules, the district may be able to both reduce route time and operate fewer route buses. Although not studied by the team in this report, staggering bell schedules may allow for further efficiencies concerning extracurricular transportation services. If the district could eliminate some of its outside charter bus contracts for extracurricular/athletic transportation, this could result in additional cost savings.

Recommendations

The district should:

1. Evaluate the benefits and expenses of providing school bus transportation services for the community and vocational/workability programs as well as small group individualized instruction.
2. Consider centralizing a district bell schedule developed by the Transportation Department management to better use the district's school bus fleet.
3. Improve communication and articulation with the Transportation Department regarding potential bell schedule changes. This should be accomplished at the earliest stage of planning to improve efficiency of operation.

Communication

Communication between the Transportation and Special Education staffs is poor, and there is little cooperative effort between the two departments. The Special Education Department does not routinely include the appropriate transportation staff members in transitional meetings for feeder elementary schools. The Transportation Department is often caught by surprise when students transition to the district needing specific types of transportation services. This process also does not allow Transportation to consider modifying transportation services that were provided by the elementary school district that exceed the service level required to best meet a student's needs.

The district has extraordinarily high expenses related to mid-day therapy transportation. An examination of transportation requests made by the special education staff to the Transportation Department indicated that both staffs do not routinely review the process to avoid duplication of effort. Students requiring therapy services could be scheduled more efficiently to reduce transportation expense. This can be achieved through ongoing, open communication between the individuals who are the most familiar with transportation scheduling and a central coordinator in the special education staff.

The district implemented a new computerized IEP system this year, but it does not fully meet the requirements of a Web-based system. FCMAT found discrepancies between the Transportation and Special Education departments regarding the numbers of students being transported. The Transportation Department has no access to information on the IEP, the role of transportation is unclear on the form, and it is not listed as a related service. Information between the Special Education and Transportation departments is not relayed efficiently or effectively.

The special education and transportation staffs greatly respect each other's work, but each department also believes the other does not fully understand the parameters involved in that work. In addition, each staff perceives that the other questions the validity of its requests. The mid-level transportation and special education staffs communicate daily, but the directors of both programs have little regular communication. As a result, both programs are reactive concerning transportation issues. The top leadership of both programs should communicate on a regular and ongoing basis to ensure that the district can efficiently meet the needs of its special needs students who require transportation services.

There is an additional lack of effective communication and cooperative effort between the Special Education and Finance departments. No formalized mechanism exists to discuss the potential liabilities of due process, mediated settlements and/or federal litigation. In addition, the Finance Department was unaware of the number of students transitioning to the district as ninth graders with active IEPs for nonpublic school placements. This can be costly for the district. Ongoing communication between both the Finance and Special Education departments could change the perception that the Special Education Department never denies parent requests for costly services.

Recommendations

The district should:

1. Immediately schedule regular meetings between the Special Education and Transportation departments that require the attendance of the directors of both departments. These meetings should have agendas with topics of discussion that include areas of concern for both departments.
2. Start annual training sessions with IEP case managers to allow transportation personnel to discuss the specifics of implementing the transportation services on requests generated from IEPs. This will help to eliminate the authorization of transportation services at IEP sessions without considering the expense of these services.
3. Determine the information needed by the Special Education and Transportation departments to eliminate discrepancies regarding the numbers of students transported by the district.
4. Institute regular meetings between the Deputy Superintendent and the Director of Special Education to discuss the fiscal impact of students who transition to the district with costly placements and services on their IEPs. The Deputy Superintendent should be updated on all potential due process, resolution sessions, and mediated agreements during these meetings.

Program Delivery Model

The district offers special education programs and services for students with special disabilities who are in ninth to twelfth grade, and transition services for students ages 18-22. The district implements an advocate-teacher model for the delivery of programs and services to students with disabilities. Students in special education are appointed an advocate-teacher.

The district implements a range of program delivery models. Learning handicapped programs are academically based and serve students who are on track for a diploma. Programs for the moderately handicapped or cognitively delayed serve students with moderate disabilities who need to obtain functional skills and work toward acquiring a Certificate of Educational Achievement or Certificate of Completion. The severely handicapped program serves students with severe disabilities who work to acquire daily living skills.

The district also serves students in transition programs, the Work Training Center, the Homestead site, and a day treatment center. The primary service provided to students with disabilities is specialized academic instruction, which is available at all school sites.

Different program delivery models are implemented at each comprehensive high school in the district. These models are not consistent, which may lead to noncompliant delivery of special education services. The staff believes that new alternatives for program delivery are needed to achieve efficiency and effectiveness while maintaining cost efficiency. A key aspect of successful program delivery is the collaborative effort of all the departments and school sites, not just the Special Education Department.

Districtwide, the delivery models range from traditional to collaborative and full inclusion. The Special Education Department has not succeeded in implementing consistent models at every site because of a lack of ownership for special education students. Some comprehensive sites may need more collaborative or full inclusion models, but these types of models reportedly have not been implemented because of staff resistance. This may be because of a lack of training concerning students with disabilities and special education in general and lack of administrative support.

The district has not formed teams or committees to address the need for alternative delivery models to meet the needs of all students with disabilities, and there is no strategic plan to address future program delivery models.

A review of class-size and case load distributions indicates that the district operates programs and services within the recommended guidelines provided by School Services of California. However, the same staffing ratios are reportedly used at sites operating a traditional model as at those offering a collaborative model. Additional staffing is not necessary to operate collaborative or full inclusion models. There are indications that

some case loads could be redistributed to maximize resources, and this will be discussed in the report section on instructional practices. The district has maintained a steady pool of instructional aides for the special education program. Contractual agreements, however, hinder effective program management by limiting the use of temporary status aide positions to covering the short-term needs and prohibiting the adjustment of aide hours from full to part time status.

Additional collaborative models are needed at the comprehensive sites, but self-contained classrooms are still needed at comprehensive sites to meet the needs of the students who require a higher level of service in a more restrictive environment.

There is little collaboration and communication to enhance the delivery of program to students with disabilities. The district wants to improve the delivery of programs and services by expanding effective delivery models and collapsing ineffective models, but nothing is in place to facilitate a program delivery change.

The district lacks a defined, written process to analyze program costs to justify special education expenditures and programmatic needs. Cost-effective program delivery requires persistent and significant collaboration among special education, human resources, educational services and business administrators. Administrators must understand special education to ensure an effective program. They should also understand budgets in order to continually monitor budgeted revenues and expenditures.

It is crucial to consider cost efficiency when the district analyzes program delivery models. The costs of special education have continued to escalate, and this is exacerbated by the district's declining ADA. The district should analyze how to provide quality programs with less financial impact.

Recommendations

The district should:

1. Implement program delivery models that are consistent throughout the district to meet the individual needs of students. The implementation process should begin at the start of the 2008-2009 school year.
2. Expand the collaborative or full inclusion delivery model at comprehensive sites where it is needed and will be successful.
3. Continue to provide self-contained special day classes to students who need a higher level of program and services.

4. Immediately form a committee made up of special and general education staff to improve the delivery of programs throughout the district. Site administration should be included on this committee. The committee should regularly update the superintendent on program delivery models and needs. Agendas and minutes should also be provided to the Superintendent.
5. Ensure the committee collaboratively establishes the frequency of the meetings, determines its responsibilities, and develops action plans that can be implemented during the 2008-2009 school year. Student needs and cost control should be at the forefront of committee decisions.
6. Outline the responsibilities of the committee and regularly report progress to the Superintendent.
7. Ensure school site administrators take responsibility for every student on their campuses and do not shift the responsibility solely to the special education staff.
8. Require school site administrators to be involved when students with disabilities transition from eighth to ninth grade and twelfth grade to adult living.
9. Develop a districtwide plan for school site administrators to take responsibility for all educational programs at their sites, including special education.
10. Train school site administrators and the general education staff concerning special education students and issues.
11. Develop policies and procedures for successfully transitioning students with disabilities from eighth grade to high school and twelfth grade to adulthood.
12. Ensure alternative program delivery models are defensible and meet student needs.

Program Options

Because of a lack of program options in the district, placement in a nonpublic school or the Homestead site is the only available alternative during IEP meetings. As a result, many students with an emotional or behavioral disabling condition are placed in one of the most restrictive environments. Lack of available program options denies students the opportunity for a free and appropriate public education or a placement in the least restrictive environment. These placements will cost Grossmont Union approximately \$7,843,971 in the current school year, excluding transportation costs.

Recommendations

The district should:

1. Immediately begin planning to provide a full range of program options to meet the individual needs of the students with disabilities.
2. Take the necessary measures to ensure a free and appropriate public education and placement in the least restrictive environment when developing additional program options.
3. Develop a three-year projection plan to determine how high-cost placements like nonpublic schools and the Homestead High School can be avoided or eliminated by developing additional program options to meet student needs at the comprehensive school sites.
4. Provide training for general education staff members and site administrators regarding program options for students with special needs.
5. Collaborate with the feeder schools regarding interventions prior to special education placements and NPS placements.
6. Immediately form a committee to collaborate with the East County SELPA to work with the feeder schools and address interventions before NPS placements. A plan should be in place before the 2008-2009 school year.

Homestead High School

FCMAT visited Homestead High School and determined that it may not be an appropriate program placement for students. The physical structure and educational environment do not meet district health and safety standards.

Homestead is a segregated school with approximately 125 students in a very restrictive environment. The site includes the following four types of placements: small group individualized instruction, voluntary and involuntary transfers, expulsions, and a day treatment program. The high school is in a remote area, and students are isolated from all nondisabled peers. Homestead students are sometimes denied access to a free and appropriate public education in the least-restrictive environment.

Homestead is very expensive with an annual budget of \$1,672,212 excluding transportation costs. The general fund contribution is approximately \$1,269,211 per year. The district transports 125 students to the school. The district's philosophical position may be to provide these students with transportation services because of the centralized program, but this option is also costly. Scheduling the transportation of students from throughout the district to a single site requires four district school buses to cover the large geographical boundary and maintain reasonable ride times.

There is a perception that many students placed at Homestead High School have an inappropriate disabling condition designated on their IEPs. The intent of the program is to provide services for emotionally disturbed students, however, many of the students may be behaviorally disordered. Integrating these two disability categories can create an inappropriate school environment. FCMAT received data that indicates that these students are emotionally disturbed, behaviorally disturbed, specific learning disabled or have health impairments.

The students at Homestead High School could be decentralized by creating programs to serve them at each of the district's comprehensive schools or by supporting regional programs located at a few of the district's comprehensive schools. This would reduce transportation expenses. Decentralizing or regionally centralizing these programs could also allow the district to transport some Homestead students on regular education school buses that are already in the area, increasing efficiency.

Recommendations

The district should:

1. Evaluate the program benefits and transportation-related expense of supporting the SGII program and the district's emotionally handicapped program at the Homestead High School site instead of decentralizing these programs.

2. Review the practice of providing all SGII program students with transportation.
3. Immediately conduct a cost analysis to determine the savings that could result from creating self-contained classrooms for the emotionally and behaviorally disturbed on comprehensive high school sites instead of placing them at the Homestead High School.
4. Plan for the closure of the Homestead site by the 2009-2010 school year; and use 2008-09 as a planning year with the potential transition of some students to alternative district programs as appropriate.
5. Develop a plan to transfer the students at Homestead to newly developed classes at the comprehensive high school sites. These classes would be for emotionally and behaviorally disordered students with consideration given to the four types of services being provided.
6. Ensure that school psychologists reassess students who are not identified appropriately at the Homestead site.
7. Consider creating a Behavior Specialist position to help with students that have the most severe behavioral issues. To maintain cost efficiency, a qualified district psychologist should be assigned to this position instead of hiring additional staff.
8. Assign the Behavior Specialist to coordinate staff development for special and general education staff members. Staff development should center on strengthening behavior management skills in the classroom.
9. Conduct a needs assessment to determine whether a community day school is warranted for students who are under expulsion. District-provided options should be considered instead of NPS placements.

Instructional Practice

Special Education Students on Monitor Status

At Grossmont Union, 386 students are monitored throughout their four years of high school, but receive no special education services. It is not unusual for students to remain in this status throughout their four years of high school. The staffing allocation for these students is based on an established ratio of one teacher to 24 students, which is the traditional allocation for the Resource Specialist Program.

An alternative model would support placement in the least restrictive environment leading to student transfer from special education, which is the ultimate goal for students. An alternative model that reduces the number of teachers serving monitored students would be more cost efficient for the district and meet student needs. A reduction from 14.6 to 9.6 teachers would reduce expenditures by approximately \$332,958.00 (\$55,493 x 6). An individualized small group instruction model with a cap of 40 students would be the most effective and cost efficient. This type of model would also support placement in the least restrictive environment leading to transfer from the program. If possible, the model should be implemented at the inception of the 2008-2009 school year.

Recommendations

The district should:

1. Implement an alternative model to serve students in monitor status while supporting LRE.
2. Immediately implement an alternative model for the 2008-09 school year to reduce the number of teachers from 14.6 to 9.6 for an approximate cost savings of the estimated average cost per teacher. The district should use an individualized small group instruction model with a cap of 40 for the students who fall between the 0-5% categories. This model would support placement in the least restrictive environment and would lead to transfer from special education.

Special Education Time

The December 2007 CASEMIS report indicates that 569 (18.7%) special education students receive special education services for less than 10% of the day. This data may not be accurate since it is unclear exactly how many teachers consider collaboration time as special education time. To efficiently staff and monitor the effective use of resources, it is important for the district to report the amount of time students receive special education and related services accurately and consistently.

The December 2007 CASEMIS report also indicates that 54% of special education students receive services for more than half of their day. This would imply that 54% were special day class students. This data appears to be inaccurate since teachers generally consider the time a student is in a collaborative class as special education time. The confusion arose over whether to consider special education a service or a place. The special education staff is generally correct in considering special education a service. However, the CASEMIS data considers as special education only the times when students receive service away from their general education peers, thus the CASEMIS focuses on place. The directions in the WISER IEP system correctly inform the staff of how to enter this information, but since the program does not automatically compute the data, it is still open to individual teacher discretion and/or error. To efficiently staff and monitor the use of district resources, it is important for the district to have consistent and accurate CASEMIS data on the amount of time students spend in special education.

Recommendations

The district should:

1. Establish a team consisting of a special education administrator, the student's site administrator, School Psychologist and any service providers to review all IEPs that indicate less than 10% special education. The team should identify the following:
 - a) Students who could be assessed immediately to determine whether they should be transferred from special education.
 - b) Students who receive and require collaboration classes and therefore, the percentage of time they spend in special education is correctly documented on the IEP.
 - c) Students who would be eligible for a different service delivery model so the district can continue to monitor their progress and prepare them for transfer from special education.

Students Eligible for Modifications on State Tests

Only nine students were eligible for modification on state tests according to the December 2007 CASEMIS report, significantly less than the number of students who had modifications on their IEP. In the past, the staff reportedly made frequent errors in the form used for entering modification information into the CASEMIS, however, the method used and implemented in the WISER IEP system during the 2008-09 school year should resolve this problem.

Recommendations

The district should:

1. Develop a general policy regarding the use of modifications and accommodations on state tests. Unless otherwise specified in the IEP, a district policy should require the test to initially be administered without modifications so that students, their teachers and parents can evaluate how students perform this way. Subsequent IEPs would determine if any modifications are required.
2. Monitor the implementation of the WISER IEP system to ensure that the staff correctly enters information regarding the use of modifications.
3. Provide additional training on how to document on an IEP the percentage of time a student receives special education to ensure consistency between schools and adherence to the state guidelines.
4. Provide follow-up training for staff members having difficulty establishing the differences between accommodations and modifications on state tests.

Extended School Year Programs

The Extended School Year Program (ESY) costs the district \$1,018,772 for certificated and classified staff members and operating costs. The Special Education Department does not use Extended School Year guidelines to determine whether a student qualifies for these services to receive a free and appropriate public education.

Many SELPAs and districts throughout California have developed effective ESY guidelines based on the regression and recoupment requirements outlined in federal law. The special education staff does not appear to determine ESY services based on regression and recoupment. This can be a very costly service and should not be provided to students who do not meet the appropriate criteria.

Although no state and federal regulations address the specific criteria regarding when a child requires these services, court cases have provided districts with some guidance. The issue of regression and recoupment provides a framework to base discussions on student needs.

ESY services are determined by the following criteria:

§3043 Extended School Year

Extended school year services shall be provided for each individual with exceptional needs who has unique needs and requires special education and related services in excess of the regular academic year. Such individuals shall have handicaps which are likely to continue indefinitely or for a prolonged period, and interruption of the pupil's educational programming may cause regression, when coupled with limited recoupment capacity, rendering it impossible or unlikely that the pupil will attain the level of self-sufficiency and independence that would otherwise be expected in view of his or her handicapping condition. The lack of clear evidence of such factors may not be used to deny an individual an extended school year program if the individualized education program team determines the need for such a program and includes extended school year in the individualized education program pursuant to subsection (f).

- (a) Extended year special education and related services shall be provided by a school district, special education local plan area, or county office offering programs during the regular academic year.
- (b) Individuals with exceptional needs who may require an extended school year are those who:
 - (1) Are placed in special classes or centers; or
 - (2) Are individuals with exceptional needs whose individualized education programs specify an extended year program as determined by the Individualized Education Program Team.
- (c) The term "extended year" as used in this section means the period of time between the close of one academic year and the beginning of the succeeding academic year. The term "academic year" as used in this section means that portion of the school year during which the regular day school is maintained, which period must include less than the number of days required to entitle the district, special education services region, or county office to apportionments of state funds.
- (d) An extended year program shall be provided for a minimum of 20 instructional days, including holidays.
For reimbursement purposes:
 - (1) A maximum of 55 instructional days excluding holidays shall be allowed for individuals in special classes or centers for the severely handicapped; and
 - (2) A maximum of 30 instructional days excluding holidays shall be allowed for all other eligible pupils needing extended year.
- (e) A local governing board may increase the number of instructional days in the extended year period, but shall not claim revenue for average daily attendance generated beyond the maximum instructional days allowed in subsection (d) (1) and (2).

- (f) An extended year program when needed, as determined by the Individualized Education Program Team, shall be included in the pupil's individualized education program.
- (g) In order to qualify for average daily attendance revenue for extended year pupils, all of the following conditions must be met:
 - (1) Extended year special education shall be the same length of time as the school day for pupils of the same age level attending summer school in the district in which the extended year program is provided, but not less than the minimum school day for that age unless otherwise specified in the individualized education program to meet a pupil's needs.
 - (2) The special education and related services offered during the extended year period are comparable in standards, scope and quality to the special education program offered during the regular academic year.
- (h) If during the regular academic year a pupil's Individualized Education Program specifies integration in the regular classroom, a public education agency is not required to meet that component of the individualized program if no regular summer school programs are being offered by that agency.
- (i) This section shall not apply to schools which are operating a continuous school program pursuant to Chapter 5 (commencing with Section 37600) of Part 22, Division 3, Title 2, of the Education Code.

[Authority cited: Section 56100(a) and (j), Education Code. Reference: Sections 37600, 41976.5 and 56345, Education Code; 34 C.F.R. 300.346]

Recommendations

The district should:

1. Develop ESY criteria guidelines to be used by the staff making this determination.
2. Consider using guidelines that have already been developed by other SELPAs or districts throughout California.
3. Ensure that the staff receives training for ESY guidelines.
4. Ensure that extended school year services are based on regression and recoupment.

Exit Criteria – Dismissal from Special Education

The Special Education Department does not use exit criteria guidelines to determine continued eligibility for services. School psychologists usually review records instead of administering assessments to determine if students continue to qualify for special education.

The June 2007 pupil count indicates that only 18 students were transferred from special education. There were 3,036 students in the December special education pupil count. Establishing exit criteria would be a cost saving measure for the district and should be implemented at the inception of the 2008-2009 school year.

Recommendations

The district should:

1. Immediately develop exit criteria guidelines to be used during re-evaluations to determine whether students still qualify for special education.
2. Provide training to the staff to appropriately use the exit criteria guidelines.

Home Hospital Services

The district employs seven teachers to provide home hospital services to 51 students. The number of students appears to be slightly high considering the size of the district. It is unclear how the district counts instructional time for purposes of average daily attendance, but it would be important to maximize this allowance. It did not appear that the district had evaluated the situation to ensure each student met the following criteria to receive home hospital services:

As per Education Code section 56363 and California Department of Education Regulations (5 CCR 3051.4), special education and related services provided in the home or hospital for school age pupils is limited to those pupils who have been identified as individuals with exceptional needs in accordance with Section 3030 and for whom the individualized education program team recommends such instruction or services. For those individuals with exceptional needs with a medical condition such as those related to surgery, accidents, short-term illness or medical treatment for a chronic illness, the IEP team shall review, and revise, if appropriate, the individualized education program whenever there is a significant change in the pupil's current medical condition. When recommending placement for home instruction, the IEP team shall have in the assessment information a medical report from the attending physician and surgeon or the report of the psychologist, as appropriate, stating the diagnosed condition and certifying that the severity of the condition prevents the pupil from attending a less restrictive placement. The report shall include a projected calendar date for the pupil's return to school. The IEP team shall meet to reconsider the individualized education program prior to the projected calendar date for the pupil's return to school. Instruction in the home or hospital shall be provided by a regular class teacher, the special class teacher or the resource specialist teacher, if the teacher or specialist is competent to provide such instruction and services and if the provision of such instruction and services by the teacher or specialist is feasible. If not, the appropriate designated instruction and services specialist shall provide such instruction.

Recommendations

The district should:

1. Immediately analyze the home hospital data for cost efficiency. Travel time should be included in this process.
2. Assign the duty of overseeing this process to an assistant director.
3. Follow the California Education Code 56363 when determining whether home hospital services are warranted.

One-to-One Instructional Aides

The district employs 40 one-to-one instructional aides that will cost \$1,017,503.01 this year. This is in addition to the instructional aide support in other special education classrooms, which costs the district another \$5,626,727.99. Although the number of one-to-one aides does not appear to be exceedingly high for a district the size of Grossmont Union, there are some areas of concern. Staff members are confused about whether the district has a defined process to determine the need for one-to-one aides. Some staff members indicated that such a process does not exist, but the procedural handbook includes written policy and procedures on this topic. This confusion indicates that additional training is needed for paraprofessionals, teachers, program specialists, school psychologists, speech and language therapists and parents.

In the last few years, California has faced a dramatic increase in one-to-one aide services, and the numbers continue to rise, affecting programs and services. The district should utilize the policy and procedures in place to prevent adversarial relationships with parents and maintain cost effectiveness.

The Special Education Department does not have a specific staff member responsible for reviewing aide usage, analyzing student needs and evaluating program effectiveness. As the costs of special education continue to rise, it may be possible to reduce the number of one-to-one aides to utilize resources more effectively.

Recommendations

The district should:

1. Ensure that the developed one-to-one instructional aide policy and procedures are being used to determine whether one-to-one assistance is necessary. The policy and procedures should address determining need, assigning, reducing and ending one-to-one services.

2. Determine whether the existing policy and guidelines are appropriate and useful. Consider contacting Napa Valley Unified School District for examples of policies and procedures if revision is needed.
3. Immediately provide training to the special education staff on how to use the one-to-one instructional aide policy and procedures at IEP meetings, including when it is appropriate to assign this level of support. Program specialists, speech and language therapists, school psychologists, occupational therapists, adaptive physical education (APE) teachers, and parents should also receive training.
4. Consider alternatives to instructional aide support.
5. Assign the monitoring of this process to one of the assistant directors.

Individualized Education Plan (IEP) Practices

Two established practices in the district's IEP process differ significantly from the way that other districts operate. The nontraditional use of the School Psychologist as the case manager for IEPs and the use of retired personnel as administrative designees in the IEP process should be evaluated for cost effectiveness and efficiency.

By training and certification, the traditional role of the School Psychologist encompasses assessment, observation, behavioral intervention/support and counseling. Instead of the traditional role, each district psychologist is responsible for managing the cases of 250 students on his/her assigned school sites. These responsibilities include monitoring due dates for annual and triennial IEPs, scheduling IEP meetings, notifying team members of meetings, coordinating assessment and monitoring IEP implementation. Five secretaries support the clerical aspects of case management at an additional cost of \$302,302 annually. A comparative review of other similar districts indicates that Grossmont Union is the only one in the benchmark group that uses psychologists as case managers. The district does not provide counseling services to special education students.

FCMAT also found that district special education administrators do not attend the transition IEP meetings when decisions are made regarding nonpublic school placement. School site administrators routinely attend IEP meetings for special education students involved in discipline issues, but they do not routinely attend all other IEP meetings. The district uses an administrative designee process that relies heavily on retired staff members at an average annual cost of \$150,000. There is a perception of a lack of ownership over special education at the school sites due to the low rate of IEP attendance by administrators, yet there is no defined expectation for administrators in this regard.

Contractual language regarding teacher participation in IEP meetings also creates excess costs. The language requires teachers to be paid for every hour beyond the first hour of attendance after school at the hourly per diem rate and limits their IEP attendance to no more than one IEP per month during the preparation period.

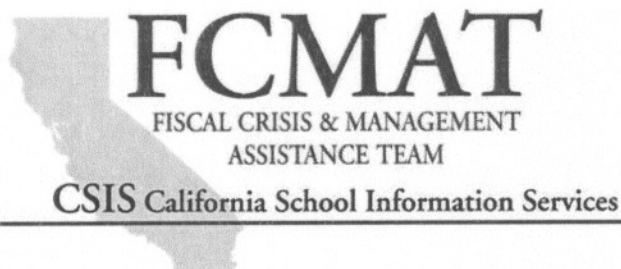
Recommendations

The district should:

1. Redistribute case load responsibilities to designated special education teachers/providers.
2. Redefine the role of the school psychologist to use their skills and abilities for assessment, observation, behavioral intervention/support and counseling.
3. Immediately design a plan to provide an appropriate range of counseling services to students with disabilities.
4. Evaluate the value of continued clerical support for the IEP process, which comes at an additional annual cost of \$302,302.
5. Ensure that appropriate administrative staff members are present at transition IEP meetings to provide students with the least restrictive environment. These administrators should also provide guidance to IEP teams to enable students to attend appropriate public school programs whenever possible.
6. Consider eliminating the excess costs of using retired staff as administrative designees in the IEP process and increase expectations for administrator participation and leadership.
7. Consider contractual language with more flexibility regarding teacher participation in the IEP process.

Appendix

A. Study Agreement



FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
March 4, 2008

The FISCAL CRISIS AND MANAGEMENT ASSISTANCE TEAM (FCMAT), hereinafter referred to as the Team, and the Grossmont Union High 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 Grossmont Union High 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:

- 1) Conduct a comprehensive review of the structure and management of the District's Special Education Program including the following areas:
 - a. Identification of students,
 - b. Staffing,
 - c. Class sizes and caseloads,
 - d. Transportation services, and
 - e. All other pertinent factors
- 2) Provide recommendations that, if implemented, will enable the District to reduce costs while maintaining legally required services. If possible, the District requests that the study and recommendations be completed in time to implement changes in fiscal year 2008/09.

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 - Sufficient copies of a preliminary draft report will be delivered to the District administration for review and comment.
- 6) Final Report - Sufficient copies of the final study report will be delivered to the District following completion of the review.
- 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 costs. 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 Management Analyst
- B. Jo Ann Murphy, FCMAT Special Education Consultant
- C. Anne Stone, FCMAT Special Education Consultant
- D. Trina Frazier, FCMAT Special Education Consultant
- E. Tim Purvis, FCMAT Transportation Consultant
- F. Larry Laxson, FCMAT Transportation 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 \$24,000. 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:

Orientation:	Estimated date of April 29, 2008
Staff Interviews:	Estimated dates of April 29-May 2, 2008
Exit Interviews:	Estimated date of May 2, 2008
Preliminary Report Submitted:	Estimated date of June 13, 2008
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: Scott Patterson, Deputy Superintendent
Business Services

Telephone 619 644-8010 FAX

Internet Address spatterson@guhdsd.net



Robert Collins, Superintendent
Grossmont Union High School District

Date



March 4, 2008

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

Date

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