



Pajaro Valley Unified School District

Special Education and Transportation Review

January 21, 2009

Joel D. Montero
Chief Executive Officer



January 21, 2009

Dorma Baker, Superintendent
Pajaro Valley Unified School District
294 Green Valley Road
Watsonville, CA 95076

Dear Superintendent Baker:

In May, 2008 the Pajaro Valley Unified School District and the Fiscal Crisis and Management Assistance Team entered into a study agreement to provide a review of the district's special education and transportation services. As defined in the study agreement, the scope and objectives of the review are to perform the following:

1. Review the efficiency and effectiveness of the district's Special Education fiscal and program delivery system
2. Review the district processes for determining the hiring of one on one paraprofessionals and make appropriate recommendations
3. Review Special Education staffing ratios and the allocation of FTE teachers to student class size.
4. Review the computerized program the district operates regarding IEPs. Make appropriate recommendation on effectiveness
5. Review interdepartmental processes, including personnel requisitions and position control
6. Review the organizational structure of the Special Education central office management and clerical support staff.
7. Review the effectiveness and efficiency of the Special Education budget development and monitoring process and the interface with the Business Services Department.
8. Identify the number of Special Education students being transported by reviewing Individualized Education Program (IEPs). Confirm the current process for determining criteria for transportation services
9. Review current transportation methods for special education students and determine if they are the most cost efficient methods. Make recommendations that would provide savings to the district, if the most efficient methods are not found to be in place, while maintaining legal compliance in meeting students needs.

FCMAT

Joel D. Montero, Chief Executive Officer

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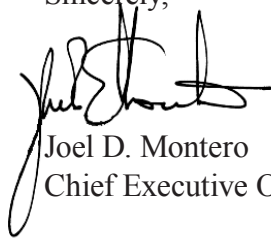
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10. Assist the district in identifying if substantial transportation savings would be realized if the district eliminated home to school regular education transportation and the potential impact on ADA.
11. Identify what the effect would be to the Special Education transportation program and expenses should the district eliminate or reduce home to school regular education transportation services.
12. Review the organizational structure and staffing efficiency of the Transportation Department
13. Review the current bell schedules and locations of facilities for special education classes.

The attached final report contains the study team's findings and recommendations. We appreciate the opportunity to serve you and we extend our thanks to all the staff of the Pajaro Valley Unified School District.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joel D. Montero', with a stylized flourish at the end.

Joel D. Montero
Chief Executive Officer

Table of Contents

Forewordiii

Introduction I

Background I

Study Guidelines I

Study Team 2

Executive Summary 3

Findings and Recommendations 7

 Special Education 7

Organization 7

Staffing 9

Program Delivery 15

Budget Development and Monitoring 37

Interdepartmental Personnel Processes 43

 Transportation 49

Overview 49

Cost Analysis 49

Special Education Transportation 51

Home-to-School Transportation 55

Appendix 67

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.

Total Number of Studies..... 711

Total Number of Districts in CA 982

● Management Assistance..... 675 (94.9%)

● Fiscal Crisis/Emergency 36 (5.1%)

Note: Some districts had multiple studies.

● Districts (7) that have received emergency loans from the state.

(Rev. 7/30/08)

Study Agreements by Fiscal Year

Fiscal Year	Number of Studies
92/93	8
93/94	14
94/95	23
95/96	29
96/97	26
97/98	26
98/99	27
99/00	47
00/01	48
01/02	59
02/03	33
03/04	71
04/05	74
05/06	78
06/07	71
07/08	54
08/09	59 (Projected)

Pajaro Valley Unified School District

Introduction

Background

The Pajaro Valley Unified School District is located in Watsonville, California and serves more than 19,000 students in grades K-12 at six middle/junior high schools, five charter schools, three comprehensive high schools, 16 elementary schools, one community day school and a continuation school. The district covers an area of 156 square miles, serving the towns of Watsonville, Aptos and Freedom, as well as rural areas of northern Monterey County.

Study Guidelines

In March 2008, the Pajaro Valley Unified School District contacted FCMAT to request a review of the district's special education operations and transportation.

A FCMAT study team visited the district on June 23-26, 2008 to conduct interviews, collect data and review documents. This report is the result of those activities and is divided into the following sections:

I. Executive Summary

II. Special Education

- a. Organization
- b. Staffing
- c. Program Delivery
- d. Budget Development and Monitoring
- e. Interdepartmental Personnel Processes

III. Transportation

- a. Overview
- b. Cost analysis
- c. Special Education Transportation
- d. Home-to-School Transportation

IV. Appendix

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

Executive Summary

Special Education

FCMAT was requested by the Pajaro Valley Unified School District to study the district's special education finances and program delivery systems and determine if the current system is effective and cost efficient. The district's staff were professional and interested in improving the effectiveness and efficiency of the special education fiscal and program delivery system. Staff members were open to finding ways to meet student needs and improve the district's fiscal health.

Like many school districts in California, the Pajaro Valley Unified School District is experiencing significant increases in special education costs without an equal amount of state or federal financial assistance. The district is also experiencing increased program delivery system costs, and the general fund contribution to the special education budget continues to increase significantly. The district's rising costs of special education and the general fund contribution to special education are both major concerns.

Special education transportation is designated as a related service in a students' individualized educational program (IEP), and the IEP team determines whether a student requires specialized transportation. The district's transportation costs continue to increase at a rapid rate without adequate state funding and are similar to those of many other school districts in California.

The district has recently experienced changes in top management. A new superintendent and several key cabinet members were appointed to their positions on July 1, 2008. Efficient and effective program delivery systems rely on the collaboration of the special education, human resources, business and curriculum departments. Leadership and staff in each of these departments need to have an understanding of special education to ensure appropriate budgeting, staffing, data collection and reporting. Communication and collaboration are essential to ensure fiscal efficiency. The superintendent, associate superintendent and SELPA/special education director should develop a strategic plan that continues to review expenditures to ensure cost effectiveness and alignment with the needs of the special education department programs.

FCMAT's review of information and interviews with staff identified several areas of concern in the district's budget development and monitoring process. A strategic plan is critical to ensuring fiscal efficiency in a budget that requires additional support from the general fund to provide services required by federal law.

Personnel costs represent the greatest expenditures in a school district's budget. FCMAT reviewed all of the district's special education staffing formulas and found several areas in which the district could be more fiscally efficient and effective, including the resource specialist program (RSP), nonpublic schools and agencies (NPA/NPS), preschool programs, and infant programs. Greater fiscal and operational efficiency also appears to

be possible in the areas of suspension, expulsion, truancy, dropouts and dismissal/exit criteria.

When examining special education costs and program efficiency, FCMAT reviews staffing patterns in relationship to student enrollment by program. In 2007-08 the district's K-12 enrollment increased by 225 students. The current K-12 special education enrollment is 11.3% of the general education population, which is the same as the statewide average. Preschool special education enrollment has been growing, which is also consistent with the statewide trend in this area. Based upon this data, there is no evidence that the district is over-identifying students for special education.

Because position control drives the budget, the business office must have clear communication and data from the special education department regarding funding for positions. A collaborative effort on the part of the human resources, business and special services departments is essential.

The number of students identified with autism is increasing nationwide, and some of the district's highest costs in special education result from serving this student population. A number of autistic students have intensive behavioral issues that require staff to have specialized training. Although the district operates successful autism programs, it has not developed a program to meet the needs of autistic students with intensive behavioral issues, and staff are not trained to meet the needs of this student population. As a result, several students have been placed out of the district at the Bay School in Santa Cruz at a cost of approximately \$1.2 million in 2007-08. The district should examine the feasibility of developing a district-operated program to serve these students.

The district uses the Faucette Web-based IEP program. Because this system was adopted for use during the 2006-2007 school year, not all case carriers have been trained to use the software and there is a backlog of overdue annual and three-year evaluations.

Although there is a perception within the district that the district yields excessively to parent and advocate demands, and although due process and associated legal costs can increase a district's special education costs, the data do not indicate that either of these are occurring. The district spent \$219,111 on attorneys' fees in 2007-08, which is higher than normal. However, nearly half of this amount was spent on a case which the district ultimately won. This would generally be considered money well spent.

Special education administrators and staff responsible for due process hearings need training in facilitated IEPs, alternative dispute resolution or other dispute resolution techniques. Site administrators rarely attend due process or resolution meetings and so are often unaware of the reasons behind decisions that are costly to the district. Special education staff should be trained in dispute resolution techniques, and site administrators should attend these meetings.

Site administrative support for and involvement in special education overall is not encouraged and is lacking, as is staff training for both special education and regular education staff and administrators. The district should provide training opportunities and

involve site administrators in decisions regarding special education staffing and programs at their sites.

Instructional aides are assigned to classrooms using a staffing formula as well as student need. A formal process to monitor aide assignments and their continuing need should be reviewed several times throughout the school year.

Many students are automatically considered eligible for extended school year (ESY) services. The district should base eligibility for these services on regression and recoupment. The special education curriculum is not consistent district-wide and is not data-driven.

The special education curriculum is determined by the unique needs of the students. Special services continues to monitor the consistency of the curriculum and work toward the appropriate academic standards as stated in the DAIT report. The district should continue to take steps to achieve greater consistency district-wide.

Transportation

The Individualized Educational Program (IEP) drives a student's eligibility and placement into special education, and transportation is a related service that should be defined in the IEP. However, the district's IEP process does not appear to have a clear procedure for assigning transportation. The transportation staff is rarely consulted regarding the decisions that are made at IEP meetings. This could have costly consequences that could ultimately increase contributions from the unrestricted general fund to support the special education program. The transportation staff should be consulted regarding transportation service for all students, and procedures should be adopted to determine students' need for service and the type of service required, if any.

Bus drivers do not receive specialized training in the needs of the special education students they transport. The district should provide this type of training and ensure that a professional development program is ongoing in the future.

The district's special education clerk is responsible for contacting students' families regarding transportation issues, if needed. This adds a needless and time-consuming step to the communication process and time could be lost in a medical emergency. In most school transportation departments, the dispatchers typically call students' families if needed. The district should implement this type of service to ensure the safety of its students.

For home-to-school transportation, the district received revenues of \$2,692,983 from the state and had reported expenses of \$4,864,465 in 2006-07, resulting in a cost per mile of \$6.051 and a cost per student of \$1,234. For special education transportation, the district received revenues of \$556,954 and reported expenses of \$1,080,690, resulting in a cost per mile of \$2.766 and a cost per student of \$4,205.

School district bus replacement programs are a major expense for school districts statewide. The district's bus replacement program is inadequate compared to industry standards and will be costly to bring up to date. The large buses (with a capacity of 55

students) in the district's fleet are primarily old buses from Crown Coach, a manufacturer that went out of business in the early 1990s. Although the transportation department appears to prefer these buses, maintaining them is costly and time-consuming, and last year's CHP report indicates that the district was very close to receiving an unsatisfactory terminal grade because of the number of serious mechanical problems. In addition, upcoming air quality regulations may require the district to replace these buses. The district should take all necessary steps to replace its bus fleet in a timely and cost efficient manner.

Greater transportation department staffing efficiencies could be realized by splitting shifts to eliminate dispatcher overtime, staffing only three driver instructor positions, hiring a second transportation supervisor and filling the unfilled mechanic position. The district should consider implementing these changes.

The transportation department is not responsible for most of the district's vehicles other than buses, and as a result the district may be spending more than necessary on these vehicles. The transportation department should be responsible for these vehicles.

There are sanitation and safety concerns with the district's transportation facility, which is rented from the County of Santa Cruz. In addition, the district may be paying unnecessary California and federal excise taxes on the fuel it purchases from the county on the site. The district should address the health and safety issues, ensure that it is not paying excise taxes or other premiums on fuel, and evaluate the cost and benefits of building its own operations facility.

Findings and Recommendations

Special Education

Organization

Throughout California, county and school district superintendents, school principals and general educators are playing a larger role in special education. There are many reasons for this increased involvement; however, two that stand out are to ensure that all students receive an effective education and to monitor expenditures from the general fund.

Efficient and effective program delivery systems rely on the collaboration of the special education, human resources, business, and curriculum departments. Leadership and staff in each of these departments need to have an understanding of special education to ensure appropriate budgeting, staffing, data collection and reporting. Communication and collaboration are essential to ensure fiscal efficiency.

Over the past several years, the district has attempted to move toward a more decentralized system of special education program delivery, but the SELPA/special services department has remained more centralized and more autonomous than other departments because of the nature of their services. The district indicated that the purpose for moving to a decentralized system was to foster the distribution of functions to the sites, create a shared sense of ownership and develop collaborative processes. However, staff interviews and data collection did not indicate that decentralization is effective in all departments or individual school sites. The continuing autonomy of the SELPA/special services department interferes with the success of this type of model. Excluding a key department from the model also creates a roadblock to fiscal efficiency.

Fiscal Planning

The district's strategic plan for evaluating the SELPA/special services department budget throughout the year consists of the staff accountant in the business division who is assigned oversight of the special education department's budget meeting with the accountant assigned to the special education department no less than quarterly and in many instances more often. In addition, the special education department accountant meets with the district's budget analyst frequently throughout the year and no less than quarterly.

The purpose of these meetings is to ensure that the budget stays aligned and for the special education staff and business staff to discuss staffing changes. Special education staff are required to process the proper paperwork to maintain this data. A strategic plan is critical to ensure fiscal efficiency in a budget that requires additional support from the general fund to provide services required under federal law.

A cost analysis justifying the expense should always accompany a proposal for adding special education staff, and the strategic plan should outline the appropriate steps for this

type of process. The district monitors budgets at least quarterly and whenever notified by the special education department regarding staff movement. Revenues are calculated using the AB 602 formula, and grants are adjusted using data from the agencies and from award letters.

Statewide, general fund contributions to special education are rising each year. Districts need to monitor special education budgets closely because they can become unmanageable quickly, leading to fiscal inefficiency.

The district's superintendent, associate superintendent and SELPA/special education director need to develop a district strategic plan that defines the process for reviewing expenditures to ensure that they are aligned with the special education budget. .

An inordinate amount of time is spent reconciling records to gain consensus on the total full time equivalent positions (FTEs) to be budgeted in a given fiscal year. This would not be required if there were better communication within the special education department.

Recommendations

The district should:

1. Appoint a committee to develop a strategic plan that includes thoroughly evaluating and analyzing the SELPA/special services department budget.

The committee should consist of the superintendent, associate superintendent, SELPA/special education director, assistant superintendent of human resources and other designated staff. The committee should meet throughout the year to review revenue and expenditures and ensure that they are in line with the special education budget.

2. Consider referring to the special education department as “Special Services” rather than “SELPA” to foster a more collaborative connection with other district departments.
3. Develop one systematic and accurate method for monitoring the total FTEs for staffing, hiring and budgeting purposes.

Staffing

FCMAT reviewed all of the district's staffing formulas and found several areas in which the district could be more fiscally efficient and effective, including the resource specialist program (RSP), nonpublic schools and nonpublic agencies (NPA/NPS), preschool programs, infant programs, suspension, expulsion, truancy, and special education dropouts and dismissal/exit criteria. Increased efficiency and effectiveness in these areas can result in greater fiscal efficiency.

Designated Instruction Services (DIS)

FCMAT reviewed the staffing ratios of the Designated Instruction Services (DIS) staff using comparative statistics and statewide benchmarks developed by School Services of California. In a few instances, the Education Code specifies maximum caseloads, but for the most part, guidelines for best practices are used.

Table 1: DIS caseload comparison with guidelines and Education Code

Provider	Guidelines	Pajaro Valley
Adapted P.E.	45-55	44
Deaf and Hard of Hearing	20-30	21
Occupational Therapy	20-35	38.5
Orthopedically Impaired	Not Available	17
Orientation/Mobility	10-15	5*
Speech/Language Preschool	40 (EC 56441.7)	38
Speech/Language (K-12)	55 (EC 56363.3)	55

*Because of a small visually impaired (VI) population, the district has only hired a .3 FTE orientation/mobility specialist

The district operates within the guidelines and Education Code-mandated caseload limits in all areas. The special education department has clearly defined operational procedures in place for all caseloads and monitors them monthly. The department should be commended for its diligence in tracking and monitoring the resources used for DIS.

Nurses and Psychologists

FCMAT reviewed the staffing ratios for nurses and psychologists using comparative statistics and statewide benchmarks from CBEDS data.

Table 2: Psychologists and nurses staffing ratio comparison

Special Education Staffing	Comparison K-12 Enrollment per FTE	Pajaro Valley Unified Enrollment per FTE
Psychologists	1,570	1,292
Nurses	2,375	1,978

The district's ratio of students to psychologists is lower than the statewide guidelines; however, at least two factors have contributed to this situation. First, the initial and pre-kindergarten assessments of preschool students are not included in K-12 calculations in these guidelines, and the district's psychologists complete all of these assessments. Second, since the reauthorization of the Individuals with Disabilities Education Improvement Act (IDEIA) in 2004, the district of location is required to complete assessments for students attending private schools located within the district's boundaries, regardless of the students' districts of residence. Based on these two factors, FCMAT believes that the district's staffing level and caseloads for psychologists are appropriate.

The district's caseloads for nurses are lower than the guidelines; however, because the district does not provide nurses at every school, its use of a consultation model with health attendants at the school sites requires a higher level of supervision and mobility. As a result, the caseloads for nurses appear to be appropriate.

Special Day Classes

FCMAT reviewed the district's special day class sizes for comparison, using staffing guidelines, comparative statistics and statewide benchmarks developed by School Services of California.

Table 3: Special Day Class staffing comparison

Special Day Class	Typical Caseload	Pajaro Valley
SDC Mild/Moderate	12-15 students, 1 aide	14 students, 1 aide
SDC Moderate/Severe	8-10 students, 2-3 aides	10 students, 3 aides
SDC Mild/Moderate Autism	8 students, 2 aides	10 students, 5 Behavior Techs
SDC Moderate/Severe/DHH	8-10 students, 2 aides	10 students, 2 aides

The staffing allocations for special day classes are well within the guidelines established by other school districts. It appears that the district distributes its resources across disability areas appropriately and efficiently.

Administrative Organization

As a single-district Special Education Local Plan Area (SELPA), the district is required to have an administrative structure to oversee the administrative duties required for a SELPA, program and service development, and implementation and evaluation for the day-to-day operations of all special education services provided in the district.

The Pajaro Valley SELPA has 2,410 students, 199 certificated employees and 284 classified employees. Responsibilities of the SELPA director include direct supervision of program directors, program specialists, school psychologists, nurses, health attendants and all classified employees that support the SELPA and Special Services office. The duties and responsibilities of this position appear to be in line with those of other single-district SELPAs in the state.

Three program directors are assigned to the special services department to oversee day-to-day special education operations. Table 4 outlines the specific administrative duties for these positions.

Table 4: Special services department program directors' duties

Duties	Program Director I	Program Director II	Program Director III
School Site Supervision	13	14	10
RSP Programs	13	17	19
SDC Programs	16	18	18
Certificated Evaluations	26	23	28
Classified Evaluations	27	13	23

Given the size and scope of the district's special education services, the level of administrative support in the Special Services department appears appropriate.

The SELPA office clerical support staff consists of one full time administrative assistant. This position provides direct support to the SELPA director and the overall department operations. The daily operations of the Special Services department are supported by two Administrative Assistant II positions. A bilingual translator is employed to comply with federal law that requires the district to provide a translator for parents during the Individualized Educational Program (IEP) process.

The data entry specialist and data entry operators are required to collect, record and submit student information to the California Department of Education (CDE). This process will be reviewed in greater depth later in this report. The need for these positions could be re-evaluated if the district had an efficient system for collecting data required by the state; however, the current computerized IEP system requires these positions.

Other clerical support positions provide communication and coordination with other departments; these will be reviewed later in this report in the section titled "Interdepartmental Communication."

Resource Specialist Program (RSP)

The Resource Specialist Program (RSP) is designed for students with less intensive needs who can be served in the general education classroom. Education Code section 56362 specifies a maximum RSP caseload of 28 students. A “push-in” service delivery model provides special education services in the general education classroom, but a consistent delivery model for services has not been adopted in the district. The delivery of RSP services is inconsistent at some sites and very successful at other sites. Delivery systems need to be more consistent throughout the district to ensure efficiency.

A review of staffing practices indicates that there are several areas where the district could be more efficient and reduce the contribution from the general fund.

The district’s RSP caseloads of 20-23 students are consistently in the low average range district-wide. California Education Code section 56362 (c) states, “no resource specialist shall have a caseload which exceeds 28 pupils.” If caseloads are stable during the course of the year, they could be increased to the high average range (26 students), which would reduce the number of resource specialists by five positions, resulting in an estimated annual savings of \$380,585.

California Education Code Section 56362(f) also requires that at least 80% of the resource specialists within a local plan have an instructional aide; however, the district has a practice of providing every resource specialist with a full time aide. FCMAT estimates that staffing 80% of the district’s resource specialists with instructional aides would result in an annual savings of \$463,597. This could be achieved by reducing by nine the number of full time instructional aide positions.

Elementary Resource Specialist Program teachers have two weeks at the beginning and two weeks at the end of the school year to develop their calendars. Because students are not receiving services during these four weeks, the time dedicated to calendar development does not support program efficiency and effectiveness. Resource Specialist Program teachers at the middle schools have a daily preparation period and a daily assessment period, which are classified as student-free periods. No other special education staff members have two student-free periods each day. This arrangement significantly reduces student contact hours for RSP staff.

Recommendations

The district should:

1. Ensure the consistent delivery of RSP services district-wide.
2. Monitor caseload information to ensure compliance with required maximum caseloads.
3. Increase RSP caseloads so that they are closer to the maximum of 28 students. Operating at an average range of 26-28 students will provide room for growth and a potential savings to the district.

4. Evaluate whether changes are warranted in the RSP teachers' time at the beginning and end of the school year. Consider both the impact of lost instructional time and staffing costs during the four weeks these teachers work without students.
5. Consider eliminating at least one of the daily student-free periods of middle school RSP staff to increase student contact time.

Program Delivery

In 2007-08 the district's K-12 enrollment increased by 225 students. The current K-12 special education enrollment is 11.3% of the general education population, making the district one of the few in California with a percentage that is the same as the statewide average for special education enrollment. Preschool special education enrollment has been growing, which is also consistent with the statewide growth in this area. There is no evidence that the district is over-identifying students for special education.

The district offers special education programs for students with disabilities from infancy through grade 12, and transition services for students ages 18-22. The district provides resource specialist program (RSP), mild/moderate special day classes (SDC), moderate/severe SDC, autistic, emotionally disturbed (ED), deaf and hard of hearing, and full inclusion services. The district has a range of program delivery systems, from traditional to collaborative models. The delivery systems appear to be determined by the level of support for special education at each site rather than being driven by student needs.

There are inconsistencies in the process that the district uses to review delivery systems in special education, making it ineffective. When program delivery systems are not functioning efficiently, the district incurs additional costs. There are no committees to help review and evaluate the district's special education delivery systems to increase their efficiency and effectiveness.

Both special and general education staff need to share the same interpretation and understanding of special education policies and procedures. Without this, a fragmented system results, leading to program inefficiencies. The district lacks a system of collaboration and communication which would improve the special education delivery system for students. This could lead to noncompliance in the delivery of service and attendant financial losses.

Autism

The number of students identified with autism is increasing nationwide. A number of autistic students have intensive behavioral issues that require staff to have specialized training to assist with aggressive and disruptive behaviors. Although the district operates successful autism programs, it has not developed a program to meet the needs of autistic students with intensive behavioral issues, and its staff are not trained to meet the needs of this student population. As a result, several students have been placed out of the district at the Bay School at a cost of approximately \$1.2 million in 2007-08.

The district needs to continue developing its autism continuum. Staff who work in autism classrooms with students who exhibit intensive behavioral needs should be trained in many different autism methodologies, but the district may choose to use one methodology they determine to be most successful with students. An effective autism classroom includes, but is not limited to, a comprehensive program covering all areas of intensive needs, such as the following:

- Early intervention program for children with autism spectrum disorders

- Applied behavioral analysis
- Analysis of verbal behavior
- Social skills
- Occupational therapy
- Speech and language therapy
- Social skills training

The California Superintendent of Public Instruction Autism Advisory Committee’s final report, available from the California Department of Education (CDE), offers the following recommendations for training in autism spectrum disorders:

- a. Foundations of behaviorism
- b. Behavioral assessment
- c. The individual behavioral plan and the individual curriculum plan
- d. Monitoring student progress
- e. Supporting parents, families, and caregivers

The goals of an effective program are to ensure meaningful progress for students, build relationships with parents, reduce staff turnover, reduce litigation, and prevent excessively high staffing ratios.

The district has developed a continuum of autism programs from preschool through elementary school. Middle school students are served in their area of attendance through either inclusion programs or moderate/severe special day classes. As students approach the end of elementary school, it would benefit the district to consider whether an autism class at the middle school is warranted. This proactive measure could help avert costly placements at the Bay School.

Recommendations

The district should:

1. Ensure that the program directors or program specialists work closely with the students placed at the Bay School to determine which students can be appropriately transitioned to a program developed and operated by the district.
2. Begin discussing whether a middle school autism class will be warranted in the next few years.
3. Explore options for developing a district-operated autism program which will meet the needs of some of the students currently being placed at the Bay School.
4. Form an autism committee composed of administrators, special education staff, at least one principal and a parent to begin developing an effective district-operated program.

Ensure that the committee considers the following important elements when developing an effective program:

- a. Comprehensive and thorough assessment
 - b. Early intensive behavioral intervention
 - c. Intensive early and ongoing staff training
 - d. An appropriate sense of shared ownership from everyone involved in the program, from the instructional assistants to the superintendent
 - e. Collaboration of all staff members
 - f. Family support
 - g. Appropriate supervision
 - h. Defensible programs
 - i. Frequent evaluation of student progress
5. Ensure that staff members receive the appropriate training to work with students with autism who have intensive behavioral issues.

Preschool Programs

The district's preschool special education teachers teach 3.5 hours per day, four days per week. The remainder of their day includes assessments and various other duties. The district has not considered using an a.m./p.m. or a two-day/three-day split schedule for cost efficiency and equity among teachers. Making this change would allow the district to operate the preschool program with 1.5 FTE teachers rather than 3.0 FTE teachers, resulting in an annual savings of \$103,766.

The district's preschool students who require only speech services are not all served at their home school sites because of resistance from the sites. Serving these students at their home school sites would reduce costs.

Recommendations

The district should:

1. Consider implementing an a.m./p.m. or two-day/three-day split schedule for preschool special education teachers.
2. Ensure that preschool students who receive only speech services are served at their home school sites. School site resistance at some sites will also have to be addressed.

Infant Programs

The number of infants and toddlers identified as eligible for special education services has increased, especially with the rise of autism. Districts and agencies must plan accordingly to serve students at a younger age. Rather than forming its own task force, the district's SELPA/special services department plans to partner with a neighboring SELPA to form a task force to examine services for infants with autism. It would be beneficial for the district to begin this process internally rather than waiting for the neighboring SELPA.

The revenues for the infant program are calculated using the AB 602 formula, and grants are monitored. All expenditures and revenues are monitored in the same manner as those of the regular budgets, at least quarterly. In addition, the business office monitors all district budgets regularly with all departments.

Many districts have provided services, including in-home programs for infants, as vendors for a Regional Center. In these instances, the district becomes a vendor just like any other outside agency contracting to provide services. The rate is submitted to Regional Center through the SELPA. The district then receives funds from the Regional Center. Some districts have been able to fund their entire programs using this process.

Recommendations

The district should:

1. Form a district infant task force comprised of administrators, SELPA/special services staff and a parent to begin considering options to better serve this population of students.
2. Begin working to fulfill the basic requirements to vendorize with the Regional Center as a cost saving measure.

Suspension, Expulsion, Truancy and Dropouts

Data from the CDE Web site for 2005-06 and 2006-07 indicate that the district has significantly high suspension, expulsion, truancy and dropout rates. Although the data does not provide rates for special education students, the district could extrapolate this information from the data. The district indicated that policies and procedures have been implemented to address the issue. However, the data for the 2007-08 has not yet been submitted, so it is not yet possible to determine if the new policies and procedures have resulted in a decrease. The CDE Web site does not include data on nonpublic schools.

When appropriate policies and procedures are in place, many districts are able to reduce expulsion, suspension, truancy and dropout rates by keeping students in school. Every day a student is not in school represents a cost to the district that can accumulate over time, resulting in large financial losses.

Recommendations

The district should:

1. Examine the data to determine if the policies and procedures put into place have decreased the suspension, expulsion, truancy and dropout rates.
2. Monitor the special education student population's suspension, expulsion, truancy and dropout rates throughout the year.

Exit and Dismissal Criteria

The special education department does not use exit criteria or guidelines to determine continued eligibility for special education services. The June 2007 pupil count reports indicated that only 346 students were dismissed from special education. The total December pupil count for special education was 2,410 students. Although the district's percentage of enrolled students receiving special education is consistent with the state-wide average, a district can always lower its percentage rates. Establishing exit criteria and guidelines will reduce costs.

Recommendations

The district should:

1. Immediately develop exit criteria and guidelines to be used during re-evaluations to determine if students continue to qualify for special education. Implement these criteria and guidelines as soon as feasible.
2. Provide staff with training to appropriately use the exit criteria and guidelines.

Extended School Year Services

The special education department does not use extended school year (ESY) guidelines to determine if a student qualifies for these services in order to receive a free and appropriate public education. Many Special Day Class (SDC) students automatically receive extended school year services rather than regression and recoupment being the driving force behind these decisions. The special education department has not taken part in district discussions regarding summer services.

Extended school year services can be very costly and should not be provided to students who do not meet the criteria for services. Many SELPAs and school districts throughout California have developed effective ESY guidelines and share this information with other SELPAs and districts.

The California Code of Regulations (CCR), Title 5, Section 3043, specifies the following criteria for determining the need for ESY services.

§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 and guidelines to be used by the staff to help determine which students qualify for these services.
2. Consider using guidelines that have already been developed by other SELPAs or school districts in California.
3. Ensure that staff members receive training regarding the ESY criteria and guidelines.
4. Ensure that ESY services are based on regression and recoupment.

SELPA/Special Services Staffing

The recruitment, hiring and retention of SELPA/special services staff affects program delivery and has fiscal implications. Staff shortages and high turnover have forced the department to contract for services with outside agencies such as Easter Seals, EDS and others, which is more costly than hiring its own staff. A school district incurs large costs when it recruits, hires and trains an employee only to have them move to another district within a year or two. School districts and SELPAs across California have adopted major collaborative efforts to ensure that they are able to retain staff members and the investment made in them.

Recommendations

The district should:

1. Form a committee that includes SELPA/special services, human resources, and finance department staff to help increase the hiring and retention of qualified SELPA/special services staff.
2. Develop a needs assessment for staff members who have been hired within the last three years to determine how the district can improve its recruitment, hiring and retention processes.

School Site Administrative Support

There is inconsistent school site administrative support for special education. Some sites fully embrace special education, while other sites view special education as a separate department or the responsibility of the district office. School site administrators are not provided with training that describes their role in special education, nor do they receive ongoing training opportunities.

Because many of the sites are in Program Improvement (PI) status for specific populations of students, a sense of ownership is crucial at every site. Until every site begins to embrace and accept ownership for all students, road blocks to improvement will continue to impede progress. The district's administration needs to hold school site administrators accountable for supporting special education and fostering a sense of ownership and responsibility for all students.

School site administrators appear to be confused about their role in special education. At some sites, there is confusion regarding who is responsible for supervising and evaluating the special education staff. Site administrators do not frequently attend IEP meetings unless they are high-profile. It is a legal requirement that an administrator or their designee attend IEP meetings.

The special education staff members at some school sites work in isolation, with the perception they are fending for themselves rather than being part of a collaborative system.

Teachers reportedly do not have the time they need for networking and collaborating with each other.

The school sites with special education students provide classroom materials, equipment and technology support services. However, support from school site administrators is lacking with regard to technology and instructional supplies. There are special education staff members who are using old technology in the classroom. All classrooms need to be equipped with high quality equipment and current technology. Specialized materials and equipment should be the responsibility of the SELPA/special services department, while classroom materials and equipment should be the responsibility of each school site.

Recommendations

The district should:

1. Ensure that school site administrators consider every student on their campus their responsibility.
2. Provide training to school site administrators and general education staff regarding special education students and issues.
3. Develop a needs assessment to determine the areas in which school site administrators and special education staff need assistance.
4. Develop a district-wide plan for school site administrators to take responsibility for all education at their sites, including special education.
5. Ensure that classrooms have current technology and equipment
6. Ensure that the SELPA/special services department provides specialized equipment and budget support.

Curriculum

The curriculum implemented for special education is not consistent across the district. Some sites reportedly use a specific curriculum but others do not. Reports indicate that when a specific curriculum is used, instruction is not always delivered to the students as the publisher intended. The SELPA/special services department is not involved in curriculum adoption for the district. Assessment data does not always appear to drive instruction.

Recommendations

The district should:

1. Ensure that a consistent special education curriculum is used across the district and that it is implemented as the publisher intended.
2. Include the SELPA/special services director on the district's curriculum adoption committee.
3. Ensure that data drives instruction.

Staff Development and Training

Special education staff development and training is minimal. School site administrators, general education teachers, special education teachers and support staff lack the training necessary to work with special needs students. Areas in which staff members lack training include overviews of special education, teaching strategies, responsibilities of general education teachers, autism training and others.

Interviews indicated that special education teachers need more time to meet with their grade level colleagues. Opportunities to network and share information are essential in the field of special education; they allow teachers to grow professionally and improve program efficiency and effectiveness.

The SELPA/special services department provides annual beginning of the year meetings, but these have focused on compliance rather than a combination of inspiration, motivation and compliance information.

The district's recruitment, hiring and retention challenges heighten the importance of providing staff with high quality professional development and training. Arrangements can be made with other SELPAs to assist with training at little or no cost. Seeking out talented individuals within the district who specialize in specific issues is also an option.

Recommendations

The district should:

1. Ensure that staff development and training is provided to improve the delivery of services to students.
2. Include instructional assistants and parents in the trainings.
3. Ensure that the beginning of the year meeting is both motivational and compliance-driven.
4. Require school site administrators to attend training workshops regarding overviews of special education and sites' responsibilities for students with special needs.
5. Ensure that school site administrators, SELPA/special services staff, general education teachers, support staff and instructional assistants are provided with staff development and training in the following areas:
 - a. Overview of special education
 - b. Teaching strategies
 - c. Responsibilities of school site administrators and general education teachers
 - d. Autism training
 - e. Behavior management

Special Education Transportation

Transportation will be discussed in great detail later in this report; this section addresses only issues that affect special education program delivery.

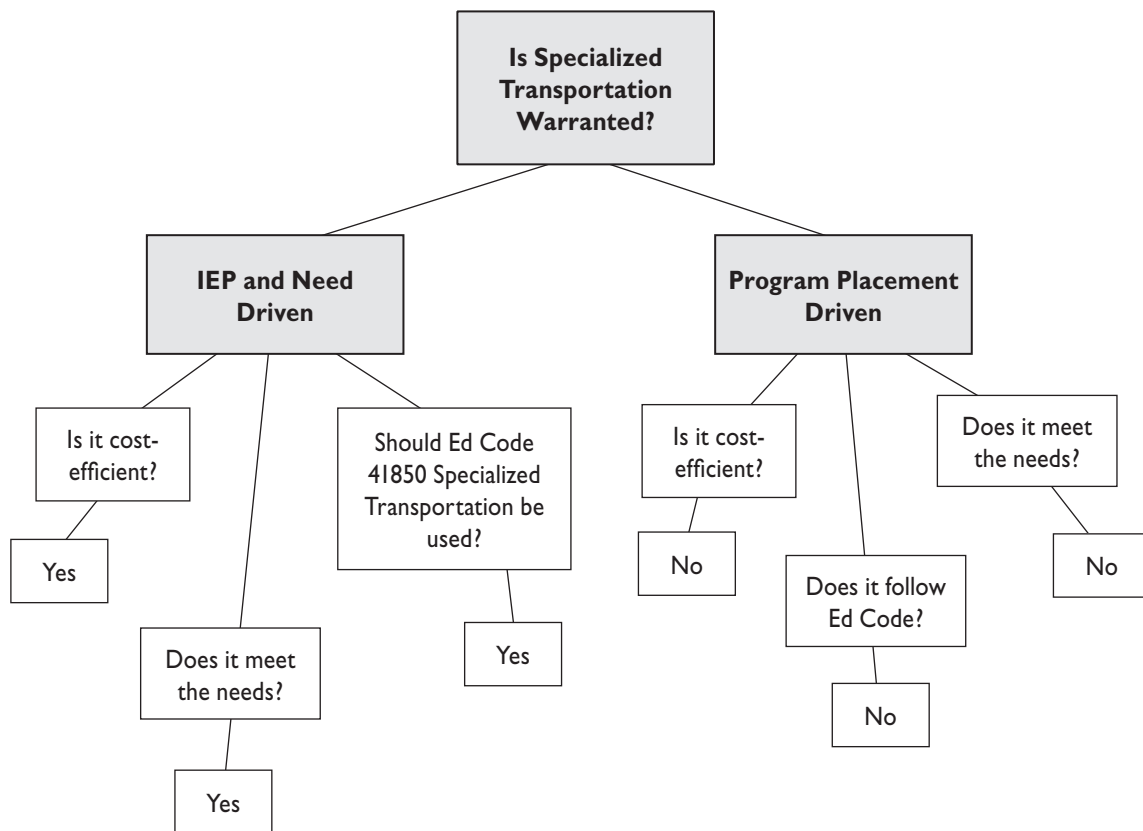
Coordination between departments is not as effective as it could be, procedures used do not always ensure consistency, and special education staff and school site administrators appear to lack training in transportation guidelines. Transportation decisions should be based on students' needs rather than on the special education program in which they participate. Not all students who are eligible for special education are eligible for transportation. Transportation needs to be discussed at IEP meetings in accordance with Education Code Section 41850, but this is not currently the district's practice.

Interviews indicated that transportation staff members are provided with no training regarding low-incidence disabilities, orthopedic disabilities, medically fragile students, seizure disorders, and emergency procedures.

Special education bus drivers do not appear to be receiving specialized training in understanding the disabilities of their riders or specialized strategies to ensure success and safety. Professionals from the SELPA/special services department could train drivers in these and other important topics.

The district does not use powerful tools such as decision trees to identify strategies to reach its goals. A decision tree is a visual graph that depicts various decisions and their consequences, and which can be used to identify issues from the simple to the complex. The following is a simple example of a transportation decision tree:

Sample Transportation Decision Tree



Recommendations

The district should:

1. Improve communication between the SELPA/special services and transportation departments.
2. Ensure that transportation decisions are based on student needs rather than program placement.
3. Provide the transportation staff with training in the following areas:
 - Low-incidence disabilities
 - Orthopedic disabilities

- Medically fragile students
- Seizure disorders
- Emergency procedures

Consider having the SELPA/special services department provide this training.

4. Develop a decision tree to assist with transportation issues.

Computerized IEP Program

In 2006-07, the SELPA began implementing the Faucette Web-based individualized educational program (IEP) system. This is not the most sophisticated system available; however, it is reasonably priced and satisfied both state and federal reporting requirements. The first year of implementation was primarily a pilot year, with full implementation scheduled to begin in 2007-08. Full implementation has not yet occurred because a number of case carriers lack either a computer, internet access or sufficient memory to run the program. Because of this, the special education department has not made use of the program mandatory, and IEP information continues to be submitted in two ways: online, and on paper to a management information system (MIS) clerk in the department. In addition, case carriers who are using the Faucette system are still required to submit their paper IEP to the MIS clerk.

The MIS clerk checks each IEP for possible errors and returns those with errors to the case carrier for correction and resubmission. If errors are still found, the IEP is again returned to the case carrier for further correction. The Web-based IEP cannot be locked until the MIS clerk has approved the IEP, and information in an unlocked IEP is not automatically uploaded to the California Special Education Management Information System (CASEMIS). The MIS clerk also enters all of the data for the IEPs that are not completed on the Web-based system. This is a costly and inefficient process with regard to clerical time and the use of teachers' time, which should be devoted instead to instructional planning. The result is a very large backlog of IEPs waiting to be checked and entered.

According to the December 2007 CASEMIS report, the number of overdue annual and three-year evaluations was 367, or 16.5% of the district's 2,225 special education pupils. The number of overdue annual and three-year evaluations for a district this size should be no more than 45, or 2% of the special education pupil count. The number of overdue IEPs for the June 2008 count was anticipated to be even higher than for the December count.

Some case carriers are not submitting their IEPs for checking and therefore are not able to lock their IEPs in the online system. These IEPs would be considered overdue by the California Special Education Management Information System (CASEMIS). This was the only item on the CASEMIS report that was checked for errors; however, because this data is the basis of all CASEMIS data, it indicates that the other CASEMIS fields would be equally problematic.

The special education division at the California Department of Education uses CASEMIS for many purposes, and it is one of the key factors in determining if a SELPA requires a verification review. It is also used by the state in funding, determining disproportionality, developing the Annual Performance Report, verifying testing data, and reviewing state-level complaints. CASEMIS can also be used in due process cases. Thus accuracy and completeness in the CASEMIS data is essential.

Recommendations:

The district should:

1. Purchase or otherwise provide access to the required computer hardware so that every case carrier is able to complete all IEPs using the Faucette system.
2. Require every case carrier to complete all of their IEPs on the Faucette system as soon as possible.
3. Confirm with the Faucette Company that all required CASEMIS data must be completed on the IEP before the IEP can be locked. If this is not the case, make any necessary changes.
4. Mandate that all IEPs be locked within a specified amount of time after completion of the IEP, unless there are special circumstances that have been approved by appropriate special education administrative staff.
5. Confirm which administrators and special education district office staff currently have access to overdue IEP reports. Add administrators or special education staff to this group if needed, and assign specific staff and/or administrators responsibility for monitoring overdue IEPs by site or program. This review could be completed by site principals, special education program specialists or program managers.
6. Consider including accurate and on time completion of IEPs in the special education certificated staff evaluation process.
7. Once all IEPs are being completed on the Faucette online system, discontinue the practice of having the MIS clerk check each IEP. The staff members who are currently responsible for monitoring the IEPs will need to continue working with the Web-based program and CASEMIS, but would have time for additional duties.

Due Process

There is a perception in the district that the special education department never denies services or programs that may be extremely costly, particularly if a parent or advocate is involved.

Of the seven district cases that required an attorney to represent the district in the 2006-07 school year, one was filed by the district, one was a compliance complaint and five were filed by a parent. The issues revolved around requests for eligibility (two cases), placement (one case), assessment (one case), and following the previous district's IEP (one case). Three of the seven cases were continued into the 2007-08 school year, and in two cases the parents withdrew their requests for due process. The remaining two cases were resolved, one by a negotiated settlement and one by a district loss at the hearing level.

Three cases in 2006-07 did not require an attorney. One of those involved one-to-one aide services, one involved a compliance complaint regarding services, and one involved a district request for mediation. In one case the parent withdrew and in two the district settled.

In 2007-08, six of nine cases required an attorney to represent the district. Five of these cases were still active at the time of FCMAT's review. Of the settled cases that required the use of an attorney, one was a compliance issue and was resolved by providing an independent educational assessment, one was dismissed, and one was settled at hearing.

The district spent \$207,323 in 2006-07 and \$219,111 in 2007-08 on attorney fees for special education. This figure appears to be on the high end of what would typically be spent for the number of cases in these years. It is important to note that nearly half of the total attorney fees for 2007-08 were related to one case which was not settled but went to hearing at which the district prevailed on all issues. This is often considered money well spent.

Certainly settlements are reached before the family or district files for a due process or a state level complaint. However, FCMAT's review of the due process and complaint cases did not support the perception that special education is quick to give in to parent demands.

Special education administrators, psychologists or other staff members who are responsible for attending and representing the district at difficult and potentially litigious IEPs have had minimal or no training in facilitated IEPs, alternative dispute resolution (ADR) or other techniques to resolve disagreements by reaching mutually agreeable solutions.

Although site administrators report that they attend IEP meetings when they are problematic, they do not attend all IEP meetings and are rarely involved in resolution meetings, mediations, or due process. As a result, they are often unaware of the reasons behind decisions that are costly to the district. This situation perpetuates the perception that the district is giving in to parents.

During the interim SELPA director's tenure, information regarding potential due process or complaint issues, as well as cases that might incur significant cost, was reported

monthly to the deputy superintendent. However, it is unclear whether the business department has been given this information and how they were involved in decisions regarding settling cases, if at all. However, it appears that this communication is improving.

Recommendations

The district should:

1. Identify special education administrators, psychologists and other staff members responsible for representing the district at potentially litigious IEPs, and provide them with training in techniques such as Facilitated IEPs or alternative dispute resolution (ADR).
2. Involve site administration whenever there is a potential or actual due process or complaint filing regarding a student at their site. Discussions should include the accuracy and completeness of the IEP, appropriateness of services that meet the student's needs, alternatives that could be implemented at the site or within the district to resolve the dispute, the cost of any additional services, the cost of the services being requested in the due process, and the costs of potential litigation.
3. Hold meetings monthly, or more frequently as needed, to discuss all current and potential cases that may involve additional cost to the district. Ensure that the meetings are attended by special education, business department administrators and other district office administrators as appropriate.

Nonpublic schools and nonpublic agencies

Nonpublic school and nonpublic agency (NPS/NPA) placements were also reviewed to determine if there is evidence to support the perception that special education yields to parent demands in this area.

Nonpublic school placements did not appear to be the result of due process cases, but rather the result of a lack of appropriate district-operated programs. In 2007-08, autism was the major factor in NPS/NPA placements (10 students), followed by emotional disturbances (three students) and severe handicaps (one student).

Nonpublic school placements cost the district \$1,023,193 in 2006-07 and \$1,148,913 in 2007-08. The increase in cost is primarily because of additional students and additional costs per student at the Bay School, though there was also an increase in the cost per student at the Achieve Kids School. Special education reduced total costs by not placing students at four other nonpublic schools, but the savings did not make up for the increases.

A comparison of NPS costs and the cost of developing an appropriate autism program that would allow six of the 11 students currently attending private school to return to the district is as follows:

Savings from returning six students to a district-operated program:	+ \$660,000
Average cost of a teacher, two aides and additional support service:	- <u>\$250,000</u>
Net savings:	+ \$310,000

Nonpublic agency costs were \$816,284 in 2006-07 and \$911,266 in 2007-08. As with nonpublic schools, the special education department attempted to reduce costs by not contracting with some agencies. The continued high cost for NPA services was primarily caused by the district's inability to hire appropriately trained and credentialed staff, including speech therapists, psychologist, interpreters, autism specialists and behaviorists. Hiring for these positions would reduce the general fund contribution to special education and provide more consistency and program integrity.

There is a need to recruit and retain qualified staff. Efforts beyond traditional recruiting may be required and may include attending job fairs out of state; a stipend for new employees in a specific category; increasing the length of the contract period for employees in a specific category to reduce the need for supplemental hours; and paying for current staff to earn the necessary certification or credentials for qualification.

Other costs that cannot be attributed to NPS or NPA placements (because the service was not performed by a NPS/NPA or because of litigation) must also be considered. The total cost of these services for 2007-08 was \$249,574. This includes a variety of costs such as reimbursement to parents for travel as required by the IEP; payment to Santa Cruz Parks and Recreation; reimbursements to parents for speech services or physical therapy that the district did not provide; payment to Cabrillo College; shredding of records; and

translation services. Payment for these services reportedly came from several different accounts.

Recommendations

The district should:

1. Review the NPS and NPA services currently provided to students with autism and determine which could be feasibly provided by current or newly hired district personnel, with or without additional training. This would include developing new programs and/or adding support and services to current programs.
2. Determine the costs and benefits of providing district-operated programs and services rather than contacting for services.
3. Ensure that any IEP meeting which includes planning for a student's return to the district is attended by a representative of the district's special education department and a representative from the nonpublic school student's home school or site where a similar program is housed.
4. Increase recruiting efforts with the goal of filling every support staff position with district personnel rather than contracted employees. The only exception should be for unusual and short-term positions.
5. Review every agreement that includes payment for a special education student outside of the NPS or NPA contracts to determine the feasibility and potential savings of providing these services using current or newly hired and trained district personnel.

Aides

FCMAT reviewed the special education staff list for the 2007-08 school year to determine the number of aides assigned to the department and the number of hours the aides worked. The staff list for 2008-09 was not available because the department was still determining positions at the time of FCMAT's review. The special services department anticipates that it will leave unfilled some positions that were open in the 2007-08 school year. All aides are department aides and are assigned by the department; however each aide is assigned to a specific certificated employee. The individual school sites have little or no say in the hiring or assignment of aides to their sites, but are responsible for evaluating the aides at their site.

The education code does not refer to aides in SDC classes; therefore, the typical ratio of aides in SDC was used in this review. Although most aides are not full time positions, all but two of the 205 aides assigned to a class receive full benefits. Many districts have determined that having the majority of their aides as part time positions is both cost effective and efficient. The advantages include significant cost reductions. However, there are disadvantages to part time positions, including more turnover, more movement of aides when positions with benefits open, and less consistency in the educational program. The advantages and disadvantages need to be considered in light of the current data.

For this review, FCMAT divided aide positions into various categories based on the program to which there were assigned and on the specific aide classification.

Resource Specialists

In 2007-08 the district employed 48 resource specialist aides. Forty-five of these were full time, one was half time (0.5 FTE), one was 0.7 FTE, and one was 0.75 FTE.

Table 5: Resource Specialist Aide Staffing

Instructional Aide I	Number of Hours
45	6
1	4.5
1	5
1	3

Mild/Moderate Special Day Classes

In 2007-08, there were 23 mild/moderate SDC classes. Although there are no regulations regarding the number of aides or percentage of time aides are to be assigned to a mild/moderate SDC class, the typical staffing for mild/moderate classes with 12-15 students is one teacher and one aide. Of course, the specific needs of the students in the class must be considered.

Table 6: Mild/Moderate SDC aides and behavioral technician staffing

Aide 1	Aide 2	Behavioral Tech.	Total Staff
25	4	2	31
2	1	0	3
0	1	0	1
0	1	0	1
0	0	1	1

A total of 37 aide positions were assigned to 23 mild/moderate classes in 2007-08. Fourteen of the mild/moderate SDC classes had one teacher and one aide; the remaining nine SDC classes had two or more aides. All of the aide positions except one receive full benefits.

Rather than assigning a one-to-one aide to a student in mild/moderate special day classes, the district will often place an aide in the classroom as an additional classroom support, with the objective of moving that aide to support another classroom as soon as reasonably possible. This can reduce the number of aides while continuing to provide the support that some students require.

Moderate/Severe Special Day Classes

The district operated 31 moderate/severe SDC classes in 2007-08. There are no regulations regarding the number of aides or the percentage of time aides are assigned to a moderate/severe class. The typical staffing level for moderate/severe classes with 10-14 students is one teacher and two aides, though the specific needs of the students in the class must be considered.

Table 7: Moderate/Severe SDC aide, behavioral technician and interpreter staffing

Aide 1	Aide 2	Behavioral Tech.	Interpreter	Total Staff
0	8	6	0	14
2	75	19	3	99
0	5	0	0	5
0	1	0	0	1
0	1	0	0	1

A total of 120 aides are assigned to the moderate/severe program. Four classes have one teacher and two aides, one class has one teacher and one aide, five classes have three aides, eight classes have four aides, seven classes have seven aides, and four classes have six aides.

Classes with physically challenged students, medically fragile students or students with autism often have higher staff-to-student ratios than the typical moderate/severe class. As with the mild/moderate classes, the district will often not assign a one-to-one aide to a student but will instead place an aide in the classroom as additional classroom support with the objective of moving that aide to support another classroom as soon as reasonably possible.

Recommendations

The district should:

1. Review the composition of all resource specialist classes to determine the appropriate staffing level. Factors should include whether the program is primarily pull-out or push-in and whether the resource specialist is actively working with any at-risk students.
2. Review the composition of all mild/moderate and moderate/severe special day classes to determine the number of aides assigned, the hours they are assigned and, if the positions are six hours per day or more, whether the positions are warranted. Factors should include the severity of student disabilities, the amount of time students are in the class, how students are mainstreamed and the way additional aides over the typical ratio are used.

Keep in mind the fact that the training required for aides in some of the more severe classes may limit the ability of other aides to support this type of program.

3. Consider hiring part time employees to replace open positions or for new positions. Also consider sharing aides at a site to support push-in programs when there is more than one special education program at a site, and/or having aides belong to a department at a site rather than assigning them to a specific teacher.

Budget Development and Monitoring

Like districts statewide, the Pajaro Valley Unified School District is concerned about the rising costs of special education. FCMAT's review of information and interviews with staff brought to light several areas of concern in the budget development and monitoring process.

The SELPA has developed and presented the annual budget plan yearly as required by the state of California. The document is prepared by the special education department, while the business department provides total costs by SACS codes. There is no other involvement on the part of the business department. The accuracy of the annual budget plan document is questionable. Although an annual budget plan does not include all expenses and is not intended to have the same level of detail as the district's budget, it is presented to the governing board, is a public document, and is a required part of the Local Plan. Therefore, it needs to be carefully prepared. The district indicated that, like other departments and school sites, the special education department is required to give the business department the account numbers. The special education department has an accountant, monitors its spending, and confers with the business office accountant at least quarterly to perform budget and expense transfers and make coding corrections as needed.

The development of the district's budget is primarily the responsibility of the business department. The district indicated that all departments, including special education, are given budget worksheets and asked to develop and submit their budgets to the business department, as well as worksheets for each type of funding. Revenues are determined for the departments using appropriate cost of living adjustment (COLA) amounts. The cost of staffing is provided to the sites with their budget worksheets. If the sites will not be supporting a position or want to change the accounting for staffing, they meet with the staff accountant and the budget analyst to revise the staffing. They are provided with new staffing cost worksheets and, if the cost has changed, new discretionary amounts to budget on the worksheet.

Using the previous year's budget and actuals, the budget is developed to cover all expected costs. For the 2008-09 fiscal year, the special education department was asked to submit possible reductions to the budget in the area of staffing. However, at the time of FCMAT's review the interim SELPA director did not know if the items she had included were in the budget for 2008-09 or if other areas of reduction were included. The upcoming budget information for special education supplied by the business department for 2008-09 contains reductions only in personnel. This information was shared with the SELPA director. It did include the reductions in the Medi-Cal Administrative Activities (MAA) coordinator and the instructional assistants proposed by the special education department. However, several areas were not accurate because the full time equivalent position (FTE) count included open positions as new positions. This document is being revised by the business department to show the actual FTEs.

In the budget information submitted for each category, not all of the actual expenses for that category are included. For example, budget category 2000, Special Education Severe

5-22, does not include supplies, mileage, conferences and testing supplies. Staffing is often the only area reflected in a specific budget category. Special Education staff did not accept the requirement to categorize all expenditures properly, thus the business division is forced to submit what has been submitted to them because they do not know to which category each expense pertains. Proper California accounting practices require that all expenditures be categorized with the appropriate account code structure. Special education staff need to include all expenditures broken out by this structure to ensure proper reporting to the state on the part of the business division. Personnel are the most costly area of a program budget, but all costs for that program should be included so that the true cost of the program can be understood. Currently, costs such as mileage and supplies may be included in category 2009, Regionalized Services, or category 2103, Unspecified. In addition, category 2103 included a general category 5800, Professional Services, which had a total budget of \$225,000.

Maintenance of Effort (MOE)

Although the district indicated that the business office has shared documents with special education department, the special education department does not have a clear understanding of what MOE is or how the general fund contribution can be reduced while sustaining the required MOE. Maintenance of effort is new to the interim director. It is important for the SELPA director to have a clear understanding of MOE so that the special education and business departments can work collaboratively on long-term budgeting.

Health Services and Home/Hospital

The special education documentation for the 2007-08 fiscal year contains separate budgets for health services, and home/hospital nurses are also included in other budgets such as infants, low-incidence, and some grants. The special education department believes that these areas are included in their overall budget and therefore affect the general fund contribution to special education. In fact, health services and home/hospital are not included in special education costs when developing the general fund contribution. However, including these categories in the special education budget documentation and including nurses, health clerks and home/hospital teachers in the projected special education department staffing for 2008-09 make this very confusing for special education.

Medi-Cal and Medi-Cal Administrative Activities (MAA)

Medi-Cal Administrative Activities income is included in the special education budget and is used to fund nursing and health clerk services as well as some supplies. However, Medi-Cal income was not included in the special education budget for 2007-08. Medi-Cal income is generated by the staff members who provide specific services and hold specific licenses, including nurses, speech therapists, transportation staff, and some physical therapists and occupational therapists. In most districts, Medi-Cal money is distributed in two ways: a portion is given to the departments that generate the money to improve their

services and increase the amount billed; and another portion is used to hire staff who will generate Medi-Cal billing. The district's Medi-Cal money, which is LEA money, is used solely for the Healthy Start program.

Medical Therapy Unit (MTU)

California Children's Services (CCS) operates a MTU in the district. The agreement with CCS is that the district is responsible for a variety of items, including supplies. This is based on state regulations, which require district support in operating a MTU. In the past, the district has not had a separate budget item for the MTU. However, there is a budget for the MTU in the special education department's planning for 2008-09. It is unclear, however, whether the budget amount is adequate or accurate because this was not carefully tracked in previous years.

Extended School Year (ESY)

Although the district has maintained a budget for ESY, the special education department does not always recognize that this is a budgeting process. The cost attributed to the ESY in 2007-08 was \$540,987 and included only payroll.

Supplemental Hours

Supplemental hours are assigned when a certificated staff member cannot complete their required duties or a classified staff member is used to fill an open position. For example, if a substitute teacher was unable to complete the required IEPs, another teacher would be given supplemental hours to complete them. This is a common practice in many school districts. However, problems arise when supplemental hours are not realistically assigned and/or monitored. In the district's case, more than the approved number of supplemental hours were used, billed and paid for without the awareness of the special education or business departments. The special education department is now tracking the hours and is not approving payment of hours in excess of the contracted amount.

The district has also assigned supplemental hours to support staff such as psychologists, occupational therapists and/or speech therapists in order to complete assignments that were not performed by other staff or to complete required assessments during the summer. The total number of hours approved have not been based on data and have not been monitored. In a few cases the use of a flexible calendar in lieu of supplemental hours has been successful.

The district needs to use an objective method to determine the number of supplemental hours needed. For example, an impartial and knowledgeable committee could determine how many hours would be needed to complete an infant assessment.

The most difficult issue with regard to supplemental hours is that special education staff have been paid a per diem rate rather than the district's supplemental pay rate. Special education providers believe that they should be paid at the higher rate because of the legal

requirements of their duties. Attempts to change this practice have met with minimal success. In addition, supplemental hours are not tracked separately and therefore the total cost of these hours is difficult to determine.

Recommendations

The district should:

1. Continue to ensure that the SELPA director and the business department work closely together in preparing the annual budget plan. Codes should be checked carefully so that the plan is as accurate as possible.
2. Continue to ensure that the special education director and the business department work closely together in preparing and monitoring the special education budget. This should include regular meetings to review current budget information and reconcile differences. Planning for an upcoming year's budget should be a collaborative process in which the special education is kept apprised of their budget status. All parties should seek to clarify the understanding of how nurses, health clerks, home/hospital teachers and others are included in the special education budget but may not be included in the general fund contribution to special education.
3. Code costs for supplies, mileage and other items by program for more accuracy in determining each program's costs. This is particularly important as the district develops programs to reduce the level of reliance on nonpublic schools and agencies.

When a classified position is moved from one site to another, the position listed at the first site should be closed so that it does not show additional expenditures. Data should be verified regularly so that all departments are working with the same information.

4. Ensure that the SELPA director carefully reviews the documents from the state regarding maintenance of effort and how the general fund contribution can be reduced. This will assist special education in developing new programs and in the budget development process.
5. Review Medi-Cal income to determine how that money should best be spent to ensure that the maximum amount of Medi-Cal income is generated.
6. Ensure that the special education and business departments carefully monitor the MTU and ESY budgets. Both budgets should reflect all expenses.
7. Ensure that supplemental hours are determined using an objective method, such as by an impartial and knowledgeable committee. Once a baseline of hours is established, supplemental hours should be assigned according to that baseline and carefully monitored. If it is determined that the assigned number of hours is not sufficient, additional hours should be authorized.

8. Consider using flexible schedules whenever possible for positions that frequently require supplemental hours. For example, this might include developing a calendar for the psychologist assigned to the infant program that would enable assessments to take place during summer vacation.
9. Review all supplemental hours and ensure that those hours which should be reimbursed at the district's rate are adjusted to that rate from this time forward.
10. Track supplemental hours by staff and by program to help best plan for reducing these hours.

Interdepartmental Personnel Processes

There is evidence of a collaborative effort between the human resources, business and special services departments. However, accurate and efficient staffing information is not available because of a lack of consistent processes and procedures to ensure effective communication. The special services department staff perform many of the staffing functions that are more commonly performed by a district's human resources department. These include monitoring EDJOIN for applications for posted vacancies, contacting applicants to arrange interviews, interviewing applicants, conducting reference checks and making the offer of employment. Relinquishing human resources responsibilities to the special services department is generally not consistent with best practices used by California school districts. There are several areas of concern with regard to this arrangement:

- The special services department reported that the human resources department did not place a high priority on special services staffing needs, particularly during periods when district-wide staffing activities were highest.
- The special services department perceives that it carries an undue burden for staffing within its department.
- The human resources department reported that an accommodation was reached two years ago that allowed the special services department to perform staffing functions more common to a human resources department so that the timeliness of staffing would be more satisfactory to the special services department.
- The human resources department indicated that it does not have enough staff to fulfill the special services department's staffing needs within the time frame that is expected by the special services department in order to recruit and hire the best available candidates.

A review of the interdepartmental processes involving personnel requisitions and position control reveals a substantial effort toward effective communication but also a need for greater efficiency. The budget analyst and a human resources analyst work cooperatively to attempt to ensure that employee demographics, position control and budget data are consistent in the district's HR database (CECC PC 2000 - formerly MAGIC) and in the software used to maintain budget records and produce budget reports (Analytic).

The special services department maintains a third set of records with data on special education employees/positions. Periodic efforts to reconcile the three sets of records have not been successful and there is therefore a lack of confidence in the accuracy of many listings, reports and analyses based upon them.

The certificated and classified HR directors, the director of special services and the special education program director who coordinates special services staffing communicate regularly regarding staffing issues.

The existing position requisition (PR) forms are well designed and seem to be used effectively. There are separate forms for various types of positions and there is a detailed, written position control procedure for the special services department. When filling a new or

vacant position, the site or department initiates a PR, which, before being acted upon, is reviewed for approval by the appropriate assistant superintendent; audited independently by the human resources and finance departments; and finally reviewed by a standing Freeze committee comprised of cabinet level officers, human resources and finance staff.

Position requisitions are completed when an aide is moved from one site to another, from one program to another, or from one pay level to another. However, the business, human resources and special education departments do not have the same information on a daily basis regarding aide positions. The special education department reviews position control information three or four times per year to reconcile the differences. This is done manually on paper, making the process tedious and subject to errors. The business and human resources departments' data differ from each other and from that of the special education department. The staff members in the special education department who are responsible for aide requisitions do not access the computer programs in the human resources or business departments and therefore do not have the same position control numbers. This causes confusion in all three departments. Confidentiality is an issue in allowing special education staff to access the other departments' programs. Access to these programs would allow verification of positions daily or weekly, ensuring consistency between departments and eliminating the need for manual, paper reconciliations.

Although requisitions are completed and sent to the Freeze committee for review, it is not always clear to the committee that this is a change for a current employee, and they often believe that a new position is being funded. In addition, because of confidentiality, the Freeze committee does not have enough information to understand why a move is being made or why a new position is being requested. The information that they have is "per IEP," which leaves them without a full understanding, with the impression that they have to approve the position and with the sense that hiring is out of control. Having a representative from the special education department sit on the Freeze committee would enable the committee to hear directly from the department regarding the reasons a position is being requested or the reasons an aide is being moved from one site to another.

In addition, the special education department staff members who are responsible for the aide requisitions are not involved in the meetings at which aide positions are discussed. At these meetings, which are attended only by special education administrators, aides may be moved, open positions may be changed, or new positions may be added. Requisitions are completed afterwards by other staff; however, interviews indicate that this does not always happen immediately and the completed requisitions may not always be accurate. Having the staff members who are responsible for the aide requisitions attend the administrative meetings would enable them to produce requisitions accurately and on time, and it would increase the special education administrators' understanding of the impact of the aide budget and the need for careful monitoring of all aide positions.

When a PR authorizing supplemental hours, temporary or short-term positions contains the specific number of hours of employment that are authorized, the payroll time sheets related to such a position are matched with the corresponding requisition. However, there

is no standard process for monitoring new workers to ensure that the hours worked do not exceed the hours authorized. As a result, budgeted funds are frequently overspent.

Special education teachers in supplemental pay assignments are compensated on a per diem basis. All other district teachers are compensated based on an hourly rate for similar types of assignments.

Personnel requisitions for special services staffing sometimes contain the notation that the requested position is required “per IEP.” This indicates that approval of requisition is mandatory to ensure compliance with the provisions of a particular IEP plan. Adequate background information concerning the justification for the position may be confidential and thus unavailable to the Freeze committee members.

To create a new one-to-one aide position, the special education department requires the case carrier or IEP team to submit forms that support the need for the one-to-one aide. Procedures for the use of one-to-one aides are defined in the procedural handbook. This information is used by the special education department to support or deny the request; however, the forms do not include information regarding the student’s daily schedule or specific information about when additional support is needed. There is also no information regarding the number of adults currently available at any specific time, and if there are other aides at the site that can provide the support requested for the student.

When a position such as a one-to-one aide is filled “per IEP” and the student served by the aide graduates or transfers, the aide position is often retained. Frequently, the aide is reassigned to serve another student; however, there is no standard audit process for this, such as closing the former position and opening a new position. As a result, the number of special services positions and the corresponding salary expenses can increase without proper authorization. The goal of most one-to-one aide positions should be to decrease the need for the aide and develop independence. If this progress is not reviewed regularly using appropriate goals on the IEP, the aide becomes permanent.

Personnel action (PA) forms are used. This form is initiated in the human resources department to convey information to the payroll finance departments regarding an employee’s assignment and compensation.

Special services certificated and classified staff members are considered employees of the special services department, not employees of school sites. The analogy provided was that special services staff member are employed by the special services “site” and the various schools they work in are like classrooms at the site. Consistent with this analogy, special services staff are assigned and reassigned periodically as needs dictate, including reassignment to a different school site.

The reassignment of special services staff is not subject to the same procedures that apply to the transfer of other staff because the movement of special services staff is considered to be within the same unit or department and therefore not a transfer. Further, the ability to reassign special services staff in this way is critical to the efficient operation of the special services department.

There is a lack of effective communication with and involvement of some school site administrators when special services staff are hired or reassigned. Some site administrators also experience a lack of satisfactory involvement in the performance evaluations of special services employees assigned to their respective sites.

The special services department generates a PR when reassigning special services staff so that the human resources and finance departments records can be maintained. However, the human resources and finance departments indicated that information regarding staff reassignments is not provided in a timely manner.

Recommendations

The district should:

1. Work to improve the level of effective communication and cooperation among the human resources, finance and special services departments.

Appropriate staff from the three departments should meet to determine the best approach to ensure that each unit has the data it needs and to develop a strategy to ensure that the records are accurate and can be reconciled.

2. Work to centralize human resources functions related to the recruitment, screening, interview and selection of special services department staff while maintaining appropriate involvement on the part of special services staff.

Consider various options to ensure that the human resources department has sufficient staffing to provide these services in a timely and effective manner, including the option of establishing a human resources specialist position dedicated to special services staffing.

3. Evaluate whether it is possible to reduce the human resources, finance and special services departments' use of different software or whether databases can be shared among the three departments.

Explore again the confidentiality issue that prohibits special education staff responsible for aide requisitions from having access to the computer programs and position control numbers in business and human resources. This should include exploring any method that would enable special education staff to have limited access to these programs.

4. Carefully monitor all open positions and ensure a clear separation between new positions and replacement positions.

Ensure that the special education department reviews the need for one-to-one aide positions, behavior technician positions and the number of aides in each class at least annually. Forms for one-to-one aides could be resubmitted either at the student's annual review or in the spring to prepare for the following year.

5. Ensure that the Freeze committee reviews the process of initiating, reviewing and approving personnel requisitions (PRs). The committee should do the following:

- Develop a procedure to ensure that the Freeze committee has access to all the information needed to properly consider PRs submitted to them. This should include identifying which supporting material can be provided from the IEP process to justify the requisition without violating confidentiality.
 - Develop a procedure for monitoring authorized supplemental hours. This should include assigning specific responsibility for this process.
 - Develop a procedure for ending assignments created “per IEP” when the position is no longer needed.
 - Review the procedure for initiating a PR when special services staff members are reassigned or an assignment is changed. Take steps to ensure that information flows from the special services department to the human resources and finance departments in a timely manner.
6. Ensure that a representative of the special education department, preferably the SELPA director, sits on the Freeze committee.
 7. Share with the Freeze committee the form packet that is submitted by a site when requesting a one-to-one aide. The student’s name’s can be removed to ensure confidentiality.
 8. Ensure that the special education staff members responsible for aide requisitions are present at special education administration meetings at which aide positions are discussed.
 9. Develop an additional form that includes what the student is doing each period of the day, the number of students and adults in the class at that time, what other supports may be available at that site, and what type of support the student needs during that period. This will enable the team to determine whether any support is needed, whether there are other staff members on site to support the student during specific periods, and whether a part time or a 6-hour per day aide is needed.

Transportation

Overview

The district encompasses an area of 156 square miles. The district owns 105 school buses, and transported regular education students on 43 home-to-school bus routes and special education students on 27 bus routes in 2007-08. Twenty-eight after-school bus routes transport students home after extended learning programs. The district also provided transportation for 616 field trips during the 2007-08 school year.

Transportation department employees and other employees were cordial and helpful throughout the fieldwork portion of this study. All requested documents were provided upon FCMAT's arrival and other necessary documents were received promptly as requested.

The district universally believes that the transportation department is serving students in a safe, supportive, cooperative and helpful manner.

Cost Analysis

The 2006-07 TRAN report is the district's most current transportation report. The district reported that 3,940 regular education students were transported on 45 routes and 257 special education students were transported on 27 special education routes. Four hundred special education students were reported to have a transportation requirement in their IEP, indicating that 143 special education students were transported on regular education buses.

For home-to-school transportation, the district received \$2,692,983 from the state and had reported expenses of \$4,864,465, resulting in a cost per mile of \$6.051 and a cost per student of \$1,234. For special education transportation, the district received \$556,954 and reported expenses of \$1,080,690, resulting in a cost per mile of \$2.766 and a cost per student of \$4,205.

The cost per student and cost per mile are ratios. Districts with a small geographic area typically have a smaller number of miles and a higher cost per mile. Special education transportation usually has more miles per route, resulting in a lower cost per mile. The cost per student also reflects the level of student loading on school bus routes. The Pajaro Unified School District's cost per mile and cost per student are both comparable to those of other districts of similar geography and size. The California Department of Education (CDE) used to publish a statewide comparative table of these figures but no longer provides this information.

Prior to the 1982-83 school year, the state reimbursed school districts for their reported home-to-school and special education transportation operating costs. In the 1982-83 school year the state capped the reimbursement to school districts. Since that time, the

state has occasionally provided a cost of living adjustment (COLA) to this amount. Because of increasing operational costs and a relatively static level of support from the state, the state funding now pays for an average of approximately 45% of school transportation costs statewide. School districts have to contribute the remaining 55% from their general funds.

This affects some school districts disproportionately. School districts that experience declining enrollment will see their school transportation allocation cover a higher percentage of their costs; school districts that are growing have to use more of their general fund to support school transportation. The Pajaro Unified School District receives 55.3% of its home-to-school transportation revenue and 51.5% of its special education transportation revenue from the state, which are higher percentages than the statewide averages.

The district has allocated some fixed costs to the special education object code 7240 in the budget, but it appears that not all fixed costs are allocated in this fashion. The district needs to determine a rational protocol for allocating costs to each program and assign those costs appropriately. Many school districts will determine the percentage of home-to-school bus routes and special education bus routes and use those percentages to assign costs.

Recommendation

The district should:

1. Continue current efforts to assign home-to-school and special education costs appropriately.

Special Education Transportation

The number of special education students who receive school transportation service varies depending on the reports reviewed. The number of special education students served on school buses will naturally vary daily. The district's 2006-07 TRAN reported that 257 students were transported on special education buses and 400 students had transportation listed as a related service on their IEP, indicating that 143 special education students were transported on regular home-to-school bus routes. District staff verified the accuracy of these numbers

Determination of need

The IEP process does not appear to have a clear procedure for assigning school transportation. The transportation staff is rarely consulted regarding the decisions that are made at IEP meetings. This could have costly consequences. The special education portion of this report recommends creating and using a decision tree as part of the process for determining special education students' need for transportation service. The transportation staff should be consulted regarding transportation service for some students, and procedures should be adopted to determine if students require service and, if so, whether they require curb-to-curb service or could ride the regular home-to-school bus route. The decision to transport certain students using taxi cabs is made at the IEP level and the transportation department is not consulted. This can involve significant costs. It may be possible to place some of these students on district buses.

When a student requires specialized transportation service, the request is routed to a clerk in the special education department who communicates the need to the transportation department using a written transportation request. The transportation department is usually given five days to route the student, though it may take longer for some students. The transportation department then schedules the morning and afternoon bus service and communicates the route number, morning pick-up time and afternoon drop-off time to the special education department clerk. The clerk then calls the family to convey this information.

Family Contacts and Student Information

Because the clerk makes contact with the family, the clerk becomes the primary contact for the families whenever issues or changes arise with their school transportation service. The clerk also retains and stores all of the student emergency, contact and medical information. It appears that the transportation department does receive information regarding students' specialized medical needs, such as for students who are prone to seizures. Whenever the bus drivers experience problems on the route or when parents are not home to receive their child, the dispatchers call the special education department clerk, who contacts the family to arrange a resolution.

In most school transportation departments, all of the students' emergency, contact and medical information is stored at the transportation department and the dispatchers typi-

cally call students' families if needed. The district's existing arrangement works well primarily because the current special education clerk is bilingual as well as efficient and responsible. However, the existing arrangement adds a needless and time-consuming step to the process of resolving issues, and precious minutes could be lost in the case of a serious medical emergency. The district needs to make student information accessible and available to the transportation department so that dispatchers are able to make and receive telephone calls to resolve issues for students. Much of the student information is confidential, so transportation department staff would need to receive training regarding this confidentiality.

Driver Training

Although the driver training department provides regular in-service training for drivers, the special education drivers do not seem to be receiving specialized training related to understanding the disabilities of their riders or specialized strategies to ensure success and safety. The driver instructors reported that they create training programs for all drivers and do not have specialized courses for special education drivers, so it is likely that the focus is on defensive driving, mirror use, backing exercises and other driving skills rather than on the significant needs of special education students. Professionals from the special education department could provide this training for drivers.

Routing, Scheduling and Communication

The transportation department appears to be routing special education students efficiently. Most of the district's special education routes serve more than one school in the morning and afternoon. There is a loading factor of approximately 11 students per route. This compares favorably with other special education transportation departments statewide and is further supported by the cost per student number, which is slightly lower than that of many California school districts.

Limited information about student transportation and policies is provided to parents or users of the service. One page of information is posted to the district's Web site and sent to parents in a letter at the beginning of the school year. There does not appear to be a transportation policy manual for special education parents.

It is difficult to schedule optimal bell times for special education routes. It appears that the district has worked hard to stagger bell times to achieve the most efficient routing for regular education home-to-school bus routes. There is an adequate spread of bell times to allow most special education routes to transport students to more than one school in the morning and in the afternoon.

Special education transportation costs are usually higher because of the students' specialized needs. Most students are picked up at home, and they often travel to schools that are not close to their homes. Program sites are generally spread over a large geographic area. This logistical puzzle results in smaller buses transporting smaller numbers of students who require a higher level of driver attention over many more miles than the regular

home-to-school bus routes. Reducing the number of special education program sites and assigning students to programs closest to their homes can reduce special education transportation costs. Focused attention on placing special education students who are able to ride the regular home-to-school bus routes can also reduce costs.

Recommendations

The district should:

1. Involve the transportation department in the IEP process, particularly for students for whom potentially difficult transportation decisions need to be made.
2. Ensure that special education students' information is known by the drivers on regular home-to-school routes and special education routes.
3. Ensure that the dispatchers have access to students' emergency, medical and contact information and that they make most of the telephone calls to families to resolve issues for students.
4. Provide bus drivers with in-service training regarding special education students' needs and conditions.
5. Develop a comprehensive special education transportation policy manual and distribute it to parents.

Home-to-School Transportation

Although FCMAT did not perform a comprehensive bus routing analysis, bus routes follow a logical and efficient protocol, with three to five runs per route in the morning and afternoon. A run consists of picking up students and delivering them to a school, or picking them up at school and delivering them home. A route consists of one or more runs. The district has worked hard to stagger bell times in geographic zones to maximize bus use. Efficiency could be increased by further spreading bell times. Currently bell times are approximately 7:45, 8, 8:30 and 9 o'clock in the morning in most zones and 2, 2:30 and 3 o'clock in the afternoon. To increase bus route efficiency and add a run, some schools would need to start as early as 7 a.m. and dismiss as late as 4 p.m. This would reduce the total number of bus routes by consolidating runs to existing routes and eliminating one or more routes in each zone.

The district's board policy allows the provision of home-to-school transportation and sets walking distance at one mile for grades K-6, 1.5 miles for grades 6-8 and two miles for grades 9-12. It appears that the walking distances and service areas are adhered to. The board policy allows transportation within the walking zones if there is a potential danger to students. Parents have the responsibility to ensure their child's safe travel to and from bus stops. The walking distances set by the district do not require students to walk, nor are the intended as a recommendation that students walk. Many school districts have revised their terminology and now use the terms, "service area" and "non-service area" instead of "walking distance," and clearly articulate parents' responsibilities in their transportation plan and in their communications with parents and the community. The district could explore extending its non-service areas to further reduce the need for transportation and thus reduce costs.

Minimum days are scheduled to allow for staff planning, training and other activities one day per week at most schools; however, not all schools have the same schedule, which results in additional transportation and overtime costs. The transportation department reported that these costs total \$140,000 per year. Some schools follow the shortened schedule on Tuesdays and some on Wednesdays. Most schools shorten the schedule by dismissing school early, though one school does so by beginning later in the morning. The district could reduce transportation costs by scheduling the minimum day on the same day of the week for all schools and having all schools dismiss school uniformly early. This would eliminate the current impact on the bus routes and the need for drivers to work additional time to accommodate minimum day schedules.

FCMAT could not determine the potential impact that reducing or eliminating home-to-school transportation would have on student attendance. The district would need to gauge public opinion, study demographics and survey the bus riding population to determine how attendance would decrease if transportation were reduced or eliminated. Reduced student attendance can have a dramatic effect on a school district's revenue. For example, if the district's revenue limit was \$5,000 per student, per year, a reduction of 100 students would mean a loss of \$500,000. In some counties with higher population density, safer infrastructure such as sidewalks, and a more comprehensive public transportation system,

school districts have successfully eliminated school transportation service with little effect on average daily attendance (ADA).

Home-to-school transportation is not required by state law; it is provided by district policy. It remains the parents' legal responsibility to ensure that their children are attending school. The district encompasses some areas where transportation may be reduced without significantly affecting student attendance; however, most of the district is rural and lacks infrastructure improvements that could safely support students' independent travel to school.

Reducing or eliminating home-to-school transportation and costs could reduce the state revenue received. Expenses below revenue trigger a reduction in state revenue. Home-to-school transportation revenue cannot be transferred to special education transportation. Without home-to-school transportation, the special education students who currently ride regular home-to-school routes would likely require specialized transportation service, which would further increase special education transportation costs. With 143 special education students riding home-to-school buses at a reported annual cost of \$4,205 per student, the increase would be at least \$601,305 and probably greater because newer and more expensive buses would be needed to serve this population.

Some school districts charge fees for regular home-to-school transportation. Fees have been allowed since 1992 when the California Supreme Court ruled that school transportation is not a part of the free education guaranteed by the state constitution. The maximum fees for transportation are determined by the California Department of Education (CDE). Special education students and students who are considered indigent are exempt from paying any fees.

The district adopted a policy to charge fees for regular home-to-school bus riders approximately two years ago. Although the district reports that 58% of their students qualify for free and reduced price meals, 92% of students who ride buses qualified for free and reduced meals, thus qualifying them for free bus passes. The district indicated that because of this the costs to administer the fee-for-transportation program increased and very little revenue was generated. The district discontinued charging a fee for school transportation after one year, but continued to issue passes and charge a processing fee of \$10 per pass, per year. The pass and the data the transportation department collects are valuable because the district now has accurate information about bus riders and their bus stops. The district issues approximately 7,900 bus passes per year, generating approximately \$79,000 in revenue, which is more than the amount previously generated by fees. It is not unusual for a district to issue more passes than its average daily ridership. Because the pass is so inexpensive, it makes sense many students would buy the pass for occasional or emergency use.

Recommendations

The district should:

1. Explore the feasibility of further spreading bell times to maximize bus use and reduce costs.
2. Explore the feasibility of reducing service zones or eliminating transportation in areas where safe infrastructure exists, if any.
3. Consider following the same minimum days district-wide to reduce transportation costs.
4. Take into account the fact that reducing expenses below revenue will reduce revenue from the state.

Organizational Structure and Staffing

The transportation department is led by a director who is assisted by two additional management employees: a supervisor who directly supervises all dispatchers, instructors and drivers; and a fleet manager who directly supervises all shop employees.

There are four authorized driver instructor positions, though only three have been filled. These positions are eight hours per day, twelve months per year. There are two delegated behind the wheel instructors who each drive a short morning and afternoon route and are guaranteed eight hours per day for 181 work days. The director and supervisor are also state certified driver instructors but do not normally have time to train new drivers.

There are four dispatchers, each of whom is assigned to one of four zones: north, central, south, and special education. Each of the zone dispatchers is responsible for the routes that serve the schools in their zone, and they handle all calls over the telephone and two-way radio. They ensure that all routes and trips are covered. One dispatcher administers the bus pass program and one books the field trips. The special education dispatcher routes and schedules all of the special education students and is the primary contact with the special education department clerk. Two dispatchers work a shift beginning at 5 a.m. and the other two work a shift that ends at 5:30 p.m. As reported earlier, the district has 28 bus routes that serve the extended learning program and are in operation between 5 and 7:30 p.m. The extended learning program pays overtime for one dispatcher to be on duty during this time. This dispatcher is allowed to go home with a two-way radio in case they are needed.

Three dispatchers would be adequate for an operation of this size. The shifts could be split so that dispatchers have a break in the middle of the day to cover the entire time needed, or a staggered schedule of traditional shifts could be used. The district should not be incurring overtime costs daily for evening dispatch coverage, and the evening dispatcher needs to work on site at the transportation facility.

Previously, the transportation department had one clerical position, an administrative secretary. The person in this position was promoted to office manager and the department hired an administrative secretary to fill the open administrative secretary position. At the time of FCMAT's review, the individual in the administrative secretary position had been on leave for some time and interviews indicated that this individual would be retiring soon. This lack of staff has resulted in clerical duties not being maintained to industry standards; two support positions are needed. The administrative secretary position could process all bus passes and enter all department data in the computer programs, rather than the dispatcher doing so.

The bus maintenance facility operates on two overlapping shifts starting at 5 a.m. and ending at 7 p.m. Each shift is staffed with a lead mechanic and two other mechanics. The mechanic positions are either Mechanic I or Mechanic II. When mechanic positions are open, individuals are selected and then assigned to either a Mechanic I or Mechanic II position depending on their skill level. The district is making every effort to train new hires to become qualified mechanics when necessary. Ideally, the district would have a stated number of apprentice and journeyman mechanic positions, but this may not be possible because of the pay scale and the attendant difficulty of attracting highly qualified applicants. There are also three additional mechanic positions. One of these has been authorized but never filled, and the other two are open and the district is recruiting to fill them.

The department has two fuelers who also do light vehicle maintenance such as window, light and seat repair. There is also a parts person. These three positions are classified as "Bus Driver Specialized" because they also drive a school bus when needed. It appears that the shop staffing is adequate, particularly for such an old fleet. As the fleet of buses is replaced, the district may be able to reduce mechanic staffing. The unfilled mechanic position could be filled and used to maintain the district's support vehicles.

The department is also staffed with one school bus driver for each route and eight other floater drivers who are guaranteed eight hours per day for 181 school days. It appears that the district was able to reduce by two the number of regular home-to-school bus routes over this past year. Forty-five routes were reported on the 2006-07 TRAN and the district operated 43 routes during the 2007-08 school year. Staff indicated that they believe they can again reduce the number of routes by two for the 2008-09 school year. This would create an operational savings for the district. Special education routes remained at 27 from 2006-07 to 2007-08. Special education routes can vary depending on the number of students requiring service, their home address and the program location they attend. The staff appear to pay close attention to their routes and consolidate routes when they can to ensure the most cost-effective routing. The floater drivers are guaranteed eight hours per day and may not drive for all of those hours; additional duties include washing buses.

Although it was reported that the director evaluates approximately half of the drivers, there are too many employees for the one supervisor to effectively manage. The director is also often called to off-site district meetings, making it challenging for him to adequately supervise employees. A second supervisor position could help with driver

supervision and evaluation and assist with dispatch and driver training if properly certified. Many districts have one supervisor for home-to-school transportation and one for special education transportation.

Recommendations

The district should:

1. Consider reducing by one the number of dispatcher positions.
2. Split dispatcher shifts or spread out the shifts to eliminate overtime, and require the p.m. dispatcher to remain on site until 7 p.m. to dispatch for the extended learning bus routes.
3. Consider hiring a second transportation supervisor.
4. Ensure that the administrative secretary processes bus passes and enters data.
5. Consider filling the unfilled mechanic position and assigning this position to service district support vehicles.
6. Maintain a stated number of apprentice and journeyman mechanic positions.
7. Consider eliminating the overlap in mechanics' shifts for more efficient shop use.
8. Continue to use floater drivers as mid-day bus washers to fill up their eight guaranteed hours per day.

Transportation Operations

The driver training department seems to be able to train enough drivers, with adequate time to ride along with drivers and meet all of the legal requirements. Driver training records are well organized and in compliance with the law. The district is involved in about eight minor school bus accidents per year, which is not unusual for an operation of this size. The driver instructors appear to have a good knowledge of applicable laws and regulations.

The dispatchers perform routing and scheduling tasks, input data and process bus passes. Route sheets do not provide directional information and could be much more comprehensive, particularly with regard to special education student data. Either one of the existing computer programs mentioned below could be used to accomplish this.

The district owns two school transportation software programs. One is called Versatrans and is primarily a routing and scheduling program, but can also be used for school district boundary planning. This program is used to manage the student bus pass data, but it has never been used for routing and scheduling. This is a very powerful and useful program, though it is expensive to purchase and requires an annual licensing and maintenance fee. The second program the district owns is called Trans Traks. This is a comprehensive school transportation program with modules that support vehicle maintenance, driver

training, bus passes, fuel use, and routing and scheduling. The department is beginning to use Trans Traks to input parts inventory and in a limited fashion to document driver training. This program is also very powerful. It was purchased at a more modest cost, but also has an annual license and maintenance fee. The district should study whether it is necessary to own and operate both programs, particularly since neither program has been fully implemented.

Recommendations

The district should:

1. Develop a more comprehensive bus route sheet format, with directions and more detailed student information.
2. Evaluate the need for two software programs.

Bus Maintenance

The district operates 105 school buses. The transportation department maintains the buses but does not maintain other district vehicles except a few department utility vehicles. The district operates an extremely old bus fleet that requires constant attention. The California Highway Patrol (CHP) inspects all school buses, bus maintenance records, driver training records and employee drug and alcohol testing records at least annually and issues a terminal grade. Recent terminal grades indicate some instances with the potential for serious problems. Recent reports indicate that the 45 day/3,000 mile required inspections have not always been performed at the required intervals. Last year's report indicates that the district was close to receiving an unsatisfactory grade based on the number of vehicles with mechanical problems serious enough to warrant being placed out of service. Three years ago the district received an unsatisfactory terminal grade because of problems with driver records.

Random visual inspections of buses indicated that bus engines and chassis are not cleaned regularly, bus exhaust is smoky and excessive, and most bus exteriors appear in poor condition with dents, scratches and faded lettering and paint.

At the current salary schedule for mechanic positions, the department has difficulty attracting qualified applicants. Because of this, the department's has had to hire unskilled applicants and train them. This strategy could also be contributing to the poor maintenance record.

Bus maintenance records are in good order and are well organized by the parts person. The department has adequate space and the required tools and equipment. Mechanics' hand tools and specialty tools are provided by the district. This is a relatively common practice in school districts.

Recommendation

The district should:

1. Continue to pay special attention to bus maintenance. Ensure that proper service intervals are maintained and that all laws and regulations are followed.

Bus Fleet Replacement

The large buses in the district's fleet are primarily old Crown Coaches. This bus manufacturer went out of business in the early 1990s. Parts for these buses are difficult to find, and the engines do not meet the newer emissions regulations. The district has been pursuing funding to replace the Crown Coach buses and has done so as funding has become available. In addition, to meet air quality standards the district has moved toward the conversion of buses to biodiesel. In order to maintain the 50 Crown Coach buses the district owns until it can fully replace them, the department has created an inventory of parts from other buses. The time spent to strip the parts is minor in relation to the potential cost of not being able to keep the buses on the road in good mechanical repair.

Crown Coach bus parts are stored in two shipping containers on the property. In addition, the department accepts Crown Coach buses that other school districts are disposing of and strips them for parts. As a result, the transportation department has a number of body, engine and specialty parts for Crown Coach buses.

The district has received five new buses as a result of recent replacement grants of approximately \$150,000 per bus for a grant total of \$750,000. District staff also expect to receive as many as 25 new buses from upcoming grants of approximately \$150,000 per bus, for a total grant amount of \$3.75 million. Maintaining the older buses remains a challenge, as reflected by the CHP inspections; however, the district has identified a viable way to maintain the buses in the least expensive manner until replacements can be obtained.

The district has participated in repowering four buses to 2007 standards, and has retrofitted nine Blue Bird bus exhaust systems with diesel particulate filtration (DPF) mufflers. In addition, five Detroit powered Crown Coach buses are equipped with diesel oxidation catalyst (DOC) emission mufflers. As a result, 27 of the district's 105 buses will be in compliance with the minimum 25% requirements by 2010. With the proposed grant funding, the district anticipates being eligible to replace 25 additional buses to achieve compliance for 2011. Under current regulations, the district will not be required to meet additional standards until December 31, 2017 on vehicles that must be replaced because the engines cannot be retrofitted with DPF systems.

Staff reported their aversion to alternative fuels, particularly compressed natural gas (CNG); however, many school districts have successfully operated large fleets on this fuel. In addition to the clean air benefit, natural gas now costs approximately \$0.90 per gallon equivalent, and the federal government has adopted a \$0.50 per gallon equivalent incentive for using the fuel, resulting in a fuel cost to districts of approximately \$0.40 per

gallon equivalent. Compressed natural gas fuel mileage is comparable to that of diesel. In addition, local air boards have for a number of years adopted a fuel-neutral policy that allows old buses to be replaced with either clean diesel or alternative fuel buses.

The California Air Resources Board is currently considering diesel heavy duty bus and truck emission rules that, if adopted in October 2008, will require the district to completely replace all of these its Crown Coach buses by 2013.

Recommendations

The district should:

1. Continue and increase the pursuit of an aggressive bus replacement program, using any and all grant funds available.

Route Changes, Bus Exhaust and Parking

The district's bus drivers' approval is required for any route changes. Although this language is not in the collective bargaining agreement, it is a past and current practice. This is an unmanageable and unacceptable arrangement, particularly with regard to special education transportation, which changes so frequently. To serve the needs of this fragile population in a sensitive and cost-effective manner, the district must be able to change bus routes frequently.

There are many complaints from the public regarding the smoky exhaust from the Crown Coach buses. In addition to the poor public image that this can create for school transportation and the district, the district could be subject to fines from the California Air Resources Board.

Citizens call to complain that district school buses are parked at shopping centers, private homes and other locations during off duty hours. The transportation department confirmed that drivers do use buses for personal errands or needs, that this practice is against their rules, and that they have repeatedly warned drivers about this. It appears that more strident enforcement is needed. Drivers should not be using school buses for their personal errands.

Recommendations

The district should:

1. Negotiate with the California School Employees' Association to clarify the district's right to change bus routes and times as dictated by student needs.
2. Enforce rules prohibiting drivers from using school buses for personal errands.

District Support Vehicles

The district owns and operates 96 vehicles other than buses, and 16 trailers. This includes 45 passenger vans, most of which are minivans. Some of these vehicles are used for student transportation and assigned to schools; the remainder are assigned to the food service, maintenance, grounds or administrative departments. The transportation department is currently not responsible for the upkeep of these vehicles.

An industry best practice that is common in school districts is to place these vehicles under the responsibility of the transportation department, allowing the department to oversee and control the maintenance and fuel purchasing for them, and to specify the types of vehicles that are most useful for the district to purchase.

Special attention needs to be paid to vans or other automobiles that are used to transport students. It is legal to transport nine or fewer students plus the driver in vehicles that are designed to carry that many passengers or fewer, according to section 545 of the California Vehicle Code. The district indicated that all student transportation vehicles are reviewed by the purchasing and risk management departments prior to purchase to ensure that section 545 of the California Vehicle Code is followed. The district indicated that its sites maintain their own vehicle repair records, and required maintenance is performed by qualified vendors. To manage liability and risk, those vehicles need to be subject to strict maintenance, similar to a school bus.

In addition, industry best practices include subjecting drivers of those vehicles to rules similar to bus drivers, including being part of the district's DMV pull notice program (under which DMV driving record activity is reported to the district), becoming part of a drug and alcohol testing program, and receiving training in defensive driving.

Recommendations

The district should:

1. Require the transportation department to specify types of support vehicles for purchase, maintain all support vehicles, and control and administer fueling for those vehicles.
2. Ensure that the non-school bus vehicles used for student transportation are maintained to the same standards as school buses. Drivers of these vehicles should receive defensive driving training and be included in the DMV pull notice program and the drug and alcohol testing program.

Transportation Facility

The district rents its transportation facility from the County of Santa Cruz. The facility is located at a county public works maintenance yard. The front part of the yard is the public works area and the remainder is used by the transportation department. The county is in the process of revising the contract for use of the space, but the existing contract currently remains in place. The district uses the on-site county-owned fuel tanks and pays the county for the fuel it dispenses.

Sanitation and health and safety are of concern at the maintenance yard. Water does not appear to be clean, but the county assured the district that the water is tested regularly and indicated that the water's discoloration is due to high levels of iron. The county has installed new pipes in its part of the yard that have helped eliminate the discoloration. The district as the tenant should have that same action taken in its portion of the yard. Because of heavy use, the bus parking area is dusty and the pavement is uneven, creating a tripping and falling hazard. The district maintained the yard until the County of Santa Cruz notified the district that the county would maintain it. However, county maintenance has not occurred regularly. The district should discuss this with the county and ask that the yard be maintained as specified in the new lease.

Buses are washed in a sloped area that drains to a creek behind the facility. In addition, the steam cleaning area has two sumps that are not functional. Both of these types of waste discharges should be in accordance with permits issued by the local political entity that oversees industrial waste discharges (often the local sewer district). There are strict laws regarding these types of discharges; noncompliance can result in significant fines and litigation. The county has assured the district that the proper permits are in place and testing is performed for compliance.

It appears that storm water may run off into local creeks or waterways rather than being contained, tested and monitored. The state of California requires all industrial entities to adopt and file with the state a storm water pollution and prevention plan. The County of Santa Cruz has indicated that the proper monitoring and testing is being performed, and expressed a desire to work with the district to develop a more efficient and desirable area in which to wash the buses, which are larger than the vehicles the county wash area was designed to serve.

After it signs the contract with the county extending the lease, the district intends to construct a proper sump system for steam cleaning and incorporate it with a mechanical bus washer. The district will need to complete a thorough financial analysis of this project before proceeding. A mechanical bus washer and the related equipment and construction would cost approximately \$350,000 or more. Funds had been set aside for this purpose prior to the last financial crisis in 2007-08 but were used to support the district's recovery. If a mechanical bus washer is constructed, the floater drivers' bus washing workload would decrease and the district could reduce their hours.

Depending on the cost of the renegotiated lease, the district may wish to analyze the financial feasibility of purchasing property and constructing a comprehensive operational facility for use by the transportation, maintenance and grounds departments.

Recommendations

The district should:

1. Verify that it is not paying excise taxes for fuel purchased from the county
2. Consider encouraging the County of Santa Cruz to ensure compliance with industrial wastewater and storm water rules.
3. Continue encouraging the County of Santa Cruz to address safety and health issues at the bus yard.
4. Closely evaluate the costs and benefits of installing a bus wash and a steam cleaning sump system.
5. Evaluate the financial feasibility of constructing a district-owned operations facility on district property.

Appendix A

Study Agreement

FCMAT

FISCAL CRISIS & MANAGEMENT
ASSISTANCE TEAM

CSIS California School Information Services

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM STUDY AGREEMENT

April 30, 2008

The FISCAL CRISIS AND MANAGEMENT ASSISTANCE TEAM (FCMAT), hereinafter referred to as the Team, and the Pajaro Valley 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 Pajaro Valley 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 review the following areas and provide recommendations for improvement:

- 1) Review the efficiency and effectiveness of the district's Special Education fiscal and program delivery system.
- 2) Review the district process for determining the hiring of one on one paraprofessionals and make appropriate recommendations.
- 3) Review Special Education staffing ratios and the allocation of FTE teachers to student class size.
- 4) Review the computerized program the district operates regarding IEPs. Make appropriate recommendations on effectiveness.
- 5) Review interdepartmental processes, including personnel requisitions and

position control.

- 6) Review the organizational structure of the Special Education central office management and clerical support staff.
- 7) Review the effectiveness and efficiency of the Special Education budget development and monitoring process and the interface with the Business Services Department.
- 8) Identify the number of Special Education students being transported by reviewing Individualized Education Programs (IEPs). Confirm the current process of determining criteria for transportation services.
- 9) Review current transportation methods for special education students and determine if they are the most cost efficient methods. Make recommendations that would provide savings to the district, if the most efficient methods are not found to be in place, while maintaining legal compliance in meeting students needs.
- 10) Assist the district in identifying if substantial transportation savings would be realized if the district eliminated home to school regular education transportation and the potential impact on ADA?
- 11) Identify what the effect would be to the Special Education transportation program and expenses should the district eliminate or reduce home to school regular education transportation services?
- 12) Review the organizational structure and staffing efficiency of the Transportation Department.
- 13) Review the current bell schedules and locations of facilities for special education classes.

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 Job Leader
- B. Three FCMAT Special Education Consultants
- C. Two FCMAT Transportation Consultants
- D. One FCMAT Personnel 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 \$30,000*. 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:


Intake meeting	April 3, 2008
Orientation:	(Estimated) week of June 23, 2008
Staff Interviews:	(Estimated) week of June 23, 2008
Exit Interviews:	(Estimated) week of June 23, 2008
Preliminary Report Submitted:	(Estimated) week of June 23, 2008
Final Report Submitted:	(Estimated) August 8, 2008
Board Presentation:	to be determined
Follow-Up Support:	If requested


7. CONTACT PERSON

Please print name of contact person: Mary Hart, Associate Superintendent
Business

Telephone 831 786-2140 FAX 831 728-8160

Internet Address Hart, Mary [Mary_Hart@pvusd.net]


Dr. Mary Anne Mays, Interim Superintendent Date
Pajaro Valley Unified School District


April 30, 2008
Barbara Dean, 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 report.