



CSIS *California School Information Services*

Red Bluff Union Elementary School District

Special Education Review

September 10, 2013

Joel D. Montero
Chief Executive Officer





CSIS California School Information Services

September 10, 2013

William McCoy, Superintendent
Red Bluff Union Elementary School District
1755 Airport Blvd.
Red Bluff, CA 96080

Dear Superintendent McCoy:

In April 2013, the Red Bluff Union Elementary School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for a review of the district's special education programs and services. Specifically, the agreement states that FCMAT will perform the following:

1. Analyze the district's special education encroachment on the general fund for the 2011-12 and 2012-13 fiscal years and make recommendations for greater efficiency.
2. Review the overall transportation system for general and special education to ensure efficiency and identify potential cost savings.
3. Review the transportation delivery system, including but not limited to the role of the IEP, routing, scheduling, operations and staffing.
4. Compare the administrative structure and support staff for special education with districts of comparable size to ensure that the department is sufficiently staffed to support the workload and responsibilities.
5. Provide an analysis of staffing ratios, class and caseload size using statutory requirements for mandated services and statewide guidelines.
6. Determine if the district overidentifies students for special education and assess the impact on identification rates of preschool students transitioning into the district at age five.
7. Examine the use of 1:1 instructional aides and the procedures for identification, placement and fading and make recommendations to improve efficiency.

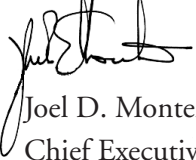
FCMAT

Joel D. Montero, Chief Executive Officer

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This final report contains the study team's findings and recommendations in the above areas of review. FCMAT appreciates the opportunity to serve the Red Bluff Union Elementary School District, and extends thanks to all the staff for their assistance during fieldwork.

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

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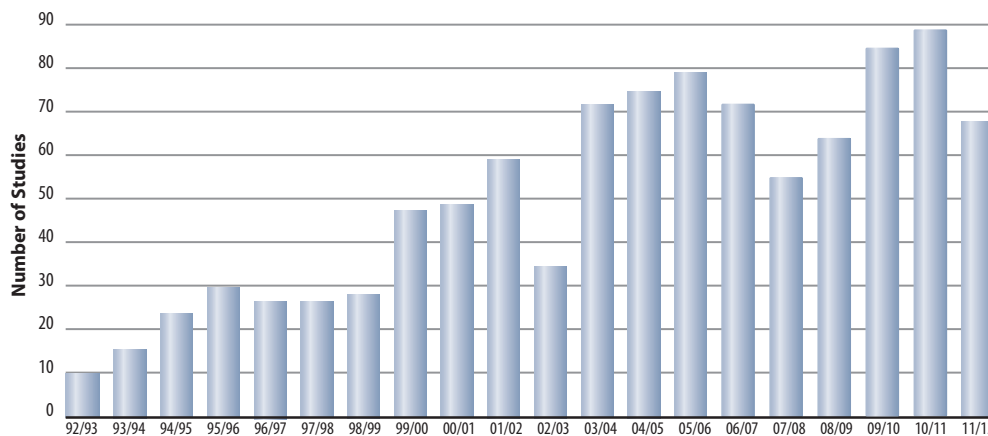
About FCMAT

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

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

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

Studies by Fiscal Year



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

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

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

Since 1992, FCMAT has been engaged to perform nearly 850 reviews for LEAs, including school districts, county offices of education, charter schools and community colleges. The Kern County Superintendent of Schools is the administrative agent for FCMAT. The team is led by Joel D. Montero, Chief Executive Officer, with funding derived through appropriations in the state budget and a modest fee schedule for charges to requesting agencies.

Introduction

Background

Red Bluff Union Elementary School District is located in Tehama County and serves 2,181 students. Approximately 11% of its students are eligible for special education programs and services. The district's unrestricted general fund contribution to special education (including transportation) was \$790,000, or 37.9% of the special education budget, in fiscal year 2011-12 and is estimated to be the same for fiscal year 2012-13. The district is concerned about its special education administrative structure, the high number of students transported to special education programs in the county and the district, and the total costs of special education.

Study Guidelines

FCMAT visited the district on May 14-17, 2013 to conduct interviews, collect data and review documents. This report is the result of those activities and is divided into the following sections:

- I. Fiscal Issues
- II. Identification of Students with Disabilities
- III. Transportation
- IV. Staffing and Caseloads
- V. Administrative Structure
- VI. 1-to-1 Instructional Aides
- VII. Appendices

Study Team

The study team was composed of the following members:

William Gillaspie, Ed.D.
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Poway Unified School District
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Technical Writer
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*As members of this study team, these consultants were not representing their respective employers but were working solely as independent contractors for FCMAT.

Executive Summary

Fiscal Issues

The district's unrestricted general fund contribution to special education (including transportation) was \$790,000, or 37.9% of the special education budget, in fiscal year 2011-12 and is estimated to be the same for the 2012-13 fiscal year; however, nonpublic school costs may increase in the district's 2012-13 budget. The special education department is not involved in budget development or monitoring. Because of time constraints, the special education director and chief business official have not regularly attended scheduled meetings or other opportunities at the SELPA level to discuss potential budget adjustments.

Transportation

The district transports 47 of its special education students, or 18.54%, which is higher than the average of 10% for most districts reviewed by FCMAT. The district should increase its nontransportation zones to 1 and 1.5 miles to increase savings on mandated home-to-school transportation.

The cooperative transportation contract between the district and the Red Bluff Union High School District benefits the district; however, there is a lack of clear communication between the two districts regarding billing and annual planning. Both districts share the responsibility for replacing four school buses because of emission control requirements and should begin exploring funding, grants or financing options.

The district does not have a formal process for transportation requests when transportation is required as a related service of special education. The appendices to this report include sample forms to help the district in this area.

Staffing and Caseloads

Although the Education Code has no specific requirements regarding special day class (SDC) sizes, School Services of California (SSC) has gathered survey data from California school districts that provide guidelines. The number of students in the district's SDCs is within SSC's recommended guidelines of 12-14 students per SDC for students with mild to moderate disabilities. One of the district's four resource specialist program (RSP) teachers has a caseload that is far below the Education Code maximum of one teacher to 28 students, and two of the RSP teachers have caseloads that exceed this maximum. The speech and language specialists' caseloads are within the maximums specified in the Education Code.

The district has 1.5 full-time equivalent (FTE) psychologist positions, giving it a ratio of 1.0 FTE psychologist per 1,454 students, which falls within California Education Facts (CalEdFacts) 2010-11 ratio guidelines. The district also contracts with an outside school psychologist to conduct assessments; however, at the time of fieldwork there was a backlog of 30 evaluations that were not expected to be completed before the end of the school year.

Administrative Structure

The special education department is understaffed based on the workload and responsibilities required to meet the district's needs. The special education director's position has split duties that include a 0.5 FTE psychologist assignment and 0.5 FTE director of special education. However, because of increased referrals, evaluations and other needs for psychologist services, limited time is available to support special education program staff and services. The district has fewer full-time equivalent administrator positions for special education than the average of four comparison

districts of similar size. In addition, there is no clerical support for special education administration.

Principals and special education staff are not provided with sufficient training and support. Because of workload responsibilities, the special education director has been unable to attend important SELPA meetings regularly, and as a result lacks clear articulation of and support for procedural and program issues.

The district's special education program lacks a universal curriculum and sufficient linkage with curriculum and instruction for special education programs to successfully implement the core curriculum. There are no formal meetings of staff with similar jobs (known as job-alike meetings) or special education meetings for teachers to receive training regarding procedures, updates, curriculum or instruction.

The district should restructure its special education administration as outlined in this report to achieve greater efficiency, program support and interdepartmental communication.

Identification of Students with Disabilities

The percentage of students the district identifies as needing special education programs and services has increased by approximately 1% each year for the past three years and is now at 249 students, or 11% of the district's total enrollment of 2,138 students, which exceeds the statewide average of 10%. The largest increase has been in the identification of preschool students entering the district at age five.

Approximately 14% of the district's special education students are preschoolers; the statewide average is 7%. The preschool special education increase also increases the district's total number and percentage of special education students. Countywide, the number of preschoolers identified for special education is 16% of the total number of students identified with disabilities, indicating that the district could benefit from a review of the eligibility criteria for identifying students ages 3-4 for special education services.

The district has not implemented a Response to Intervention model. The lack of interventions could cause overidentification of students for special education.

1-to-1 Instructional Aides

The district has developed guidelines to help individualized education program (IEP) teams determine the need for 1-to-1 instructional aide support; however, the guidelines do not include instructions for developing a plan to gradually reduce and/or ultimately eliminate this support (known as fading plans) in order to increase independence. The district also lacks a system for monitoring the use of 1-to-1 aides when their support is no longer needed.

Instructional aides have not received training in behavior techniques and disabilities. This type of training would help reduce the need for additional aide support.

Findings and Recommendations

Fiscal Issues

Unrestricted General Fund Contribution

The district requested that FCMAT review its unrestricted general fund contribution to special education. Most school districts need to make contributions from their unrestricted general fund to special education to sustain these programs as required, but when the amount of the contribution is excessive it becomes a concern.

The Code of Federal Regulations defines excess costs as follows:

Excess costs means those costs that are in excess of the average annual per student expenditure in an LEA [local educational agency] during the preceding school year for an elementary school or secondary school student, as may be appropriate.
(34 CFR 300.16)

In 2011-12, the district's unrestricted general fund contribution to special education was equal to 37.9% of the special education budget. For fiscal year 2012-13 the special education budget was 2,083,000. Total special education revenue was expected to increase by approximately \$186,000, and special education expenditures were expected to increase by approximately \$100,000 for 2012-13. As a result, the district's unrestricted general fund contribution for 2012-13 will remain at the same percentage as the previous year.

In November 2011, The State Board of Education Work Group reported to the state board that the statewide average total unrestricted general fund contribution to special education was 28.95% in 2010-11, 30.49% in 2011-12 and was projected to be 32.08% in 2012-13. Special education transportation was included in this calculation, but this is not always the case in individual districts statewide, which is a factor the district would need to take into account when comparing its unrestricted general fund contribution to those of other districts.

Communication and Budgeting

The special education director has not been involved in budget development or monitoring; the special education budget has been under the direction of the business department. Staff indicated that in the past the special education budget was often rolled over from one year to the next year based on the prior fiscal year's income and expenditures.

It is normal for a special education budget to fluctuate during the year, so it is important for the business department to be aware of these fluctuations. The district's special education and business departments do not meet or communicate regularly regarding budget changes. As a result, the business department often does not know about budget increases until an invoice is received.

Nonpublic Schools

The Education Code defines a nonpublic school (NPS) as follows:

[a] private, nonsectarian school that enrolls individuals with exceptional needs pursuant to an individualized education program and is certified by the department. It does not include an organization or agency that operates as a public agency or offers public service, including, but not limited to, a state or local agency, an affiliate of a state or

local agency, including a private, nonprofit corporation established or operated by a state or local agency, or a public university or college. A nonpublic, nonsectarian school also shall meet standards as prescribed by the Superintendent and board.

(Education Code Section 56034)

The Education also states the following regarding nonpublic agency services:

These services shall be provided pursuant to Section 56366, and in accordance with Section 300.146 of Title 34 of the Code of Federal Regulations, under contract with the local educational agency to provide the appropriate special educational facilities, special education, or designated instruction and services required by the individual with exceptional needs if no appropriate public education program is available.

(Education Code Section 56365(a))

The Tehama County Special Education Local Plan Area (SELPA) provides the contracts for the NPS services and the individual service agreements (ISAs) for the students served in the NPSs. Invoices for the NPS students come to the SELPA for review and payment. The percentage the district owes for the NPS payment is then forwarded to the district. The district's business office does not have copies of the NPS contracts or the students' ISAs and is not regularly apprised of the starting or ending dates of NPS services for students.

The SELPA will pay for a percentage of an NPS placement when the district meets certain requirements. For students who reside in a licensed children's institution (LCI), the reimbursement can be 100%, and for all other students the reimbursement can be as low as 50%. When a district determines that a student requires an NPS setting and wishes to access the SELPA funds, the district presents supporting documents to a regionalized placement committee, which grants the reimbursement if it agrees that the district has met the requirements.

The district had three students in an NPS during the 2012-13 school year. One student started the year in the NPS and was transferred to a district program in December. The district received a 50% reimbursement for that student. One student was placed in the NPS in February, and the placement committee only approved 50% funding for that student for one month. The committee members reported that sufficient documentation was not provided to enable them to support funding the placement, and suggested that the district reapply for funding when the necessary documentation was collected. This has not yet been done. The third student moved into the district in April with an NPS placement on their Individualized Education Program (IEP), but at the time of FCMAT's fieldwork the placement committee had not been provided with the documentation needed to approve funding.

The district costs for the two students currently in the NPS will be approximately \$25,000, not including the cost of the extended school year (ESY) program. If the placement committee had agreed to provide 50% of the NPS costs, the district's obligation may have been only \$12,500.

Nonpublic Agencies

The Education Code's requirements for nonpublic agencies (NPAs) are now the same as those for NPSs. Specifically the education code requires that an NPS meet the following requirement:

... be under contract with the local educational agency to provide the appropriate special educational facilities, special education, or designated instruction and services required by the individual with exceptional needs if no appropriate public education program is available.

Education Code 56365(a)

The district's invoices for assistive technology assessments and services indicate that the annual cost for these services will be no greater than \$10,000. The district is not contracting with any other NPAs at this time.

Litigation

Legal fees are usually incurred when a district is involved in a due process hearing, which is a hearing to resolve disagreements between a parent and a public agency regarding the proposal or refusal of a public agency to initiate or change the identification, assessment, educational placement, or the provision of special education and related services to the pupil. (CCR 60550(a)).

Legal fees can also be incurred when a district is involved in a complaint filed with the California Department of Education (CDE). Such a complaint may be filed when there is an allegation that a district has violated federal and state law and regulations pertaining to the education of a disabled student. In addition, through compliance monitoring, the state may determine that a district has noncompliant items that must be resolved. (34 CFR 300.151-153)

In 2010-11, the district was involved in one case that did not result in a due process hearing but did incur significant legal costs. No complaints have been filed with the CDE recently, and as of FCMAT's fieldwork, the district's total special education legal costs for 2012-13 were approximately \$9,100.

Extended School Year

Extended school year (ESY) is a program provided to students with IEPs when school is not in session, such as during summer break. ESY differs from general education summer school because its intent is to address regression and recoupment of students with special needs.

The summer of 2013 is the first year that the Tehama County Office of Education has not provided the ESY program for the district's students. The district has an ESY program scheduled for 20 days for 10 students who have ESY on their IEPs. This is 3% of the total district special education students. The proposed staffing for this program is one teacher, one classroom aide and three 1-to-1 aides, for a ratio of one adult to two students. The special education director will be the administrator for the program.

The district is not using a decision tree to determine if a student requires ESY. Because of the small number of students who have ESY on their IEPs, using a decision tree may not be necessary. However, having one available may help an IEP team when there is a difference of opinion regarding ESY. An example of an ESY decision tree is included in the appendices.

County Office of Education

SELPA funds are allocated to county office-operated special education programs based on each district's average daily attendance (ADA). The excess cost of providing these services is then charged to each district at defined rates, multiplied by the number of district students served.

The district's second interim financial report reduced the district's potential bill-back from \$109,997 to \$90,498. The final financial report will be adjusted based on the cost of the

programs and the total number of district students in those programs. As of the second interim, the base amount calculated using the district's ADA was \$55,432. In addition, the district will be billed \$35,066 for specific student services, as shown in the following table.

District students in County Office of Education Programs

| Program | Students | Excess Costs |
|-------------------|----------|--------------|
| COE Preschool | 25 | \$9,562 |
| Severely Disabled | 16 | \$18,816 |
| Speech/Language | 42 | \$6,688 |
| Total | 83 | \$35,066 |

The number of students indicated in the above table was provided by the county office but the district has not verified this information. It is important to verify these numbers because some students' do not reside within the district's boundaries and are therefore incorrectly included in the district's calculation. For example, the program for disabled students has three more students than were listed in the district's May report. For these reasons, the county office's count needs to be verified.

Based on the current funding model, it would not be fiscally beneficial for the district to provide the services currently provided by the county office. Doing so would cost the district a minimum of \$70,000 annually (including benefits) to employ a speech therapist for the 42 students in the table above.

Medi-Cal

In January 2013 the district began billing under Medi-Cal for services provided by district personnel, using the same Medi-Cal billing provider as the county office. Staff members indicated that the district is billing for the following:

- Nursing assessments
- IEP counseling
- Psychologist assessments
- Speech assessments and therapy

It was not clear from the information the district provided whether parental consent has been obtained to access Medi-Cal, or if there is an endorsing physician to allow billing for speech therapy. Other services such as 1-to-1 health aides, occupational therapy, or audiology are not provided by district staff and are therefore not billable.

Recommendations

The district should:

1. Ensure that the special education director is involved in budget development and monitoring.
2. Schedule regular monthly meetings, or other monthly methods of communication, between the special education director and the business department to monitor the general fund contribution and all budget adjustments.

3. Ensure that the business department has a copy of all individual service agreements for NPSs and NPAs and is aware of the starting and ending dates of service for all students with NPS placements.
4. Provide the SELPA committee with the information it needs to approve 50% funding of the two NPS students.
5. Ensure that the necessary data is provided to the SELPA committee before a student is placed in an NPS.
6. Continue monitoring the use of NPAs and their costs.
7. Continue to monitor special education legal costs and potential litigation.
8. Consider using an ESY decision tree when there is a difference of opinion at an IEP meeting regarding ESY.
9. Review staffing for the ESY class to ensure that all of the proposed staff are required.
10. If the funding model for county office-operated special education programs changes, consider providing those programs using district staff.
11. Review with the Medi-Cal billing agent the requirements for billing Medi-Cal to ensure that the district is billing for all allowable services.

Identification of Students with Disabilities

The percentage of its students that the district identifies as eligible for special education services has increased by approximately 1% each year for the past three years and is now 11%, or 249 of the district's 2,138 students, which is higher than the statewide average of 10%. Most of the increase is from preschool students transitioning into the district at age five.

Approximately 14% of the district's special education students are in preschool, which exceeds the statewide average of 7% for students at this age level. The preschool special education increase also increases the district's total percentage of special education students. Countywide, 16% of students identified for special education are preschoolers.

The county office conducts special education eligibility evaluations for all preschoolers. It would benefit the district to review the special education eligibility criteria for children ages 3 and 4.

Recommendations

The district should:

1. Review the referral process for preschool and the criteria for determining eligibility for special education at ages 3 and 4.
2. Explore options to develop interventions to serve preschool age students who have developmental needs.
3. Review the number of students referred compared to the number of students who qualify for special education and determine if referrals to special education are appropriate.
4. Review and analyze the referral rates for all schools in the district and determine if there are schools with higher referral rates than others. If so, provide staff with training and support to help avoid overidentification.
5. Examine the extent to which RtI is implemented in the district.

Transportation

FCMAT's review of district documents, documents from the Red Bluff Joint Union High School District including routing sheets and invoices, and transportation provided by the county office indicated that the district is providing regular home-to-school transportation for approximately 513 students, which is approximately 23.52% of its total student enrollment. These services are provided through a cooperative transportation contract with the Red Bluff Joint Union High School District by commingling both districts' students on 11 school bus routes.

In addition, the district provides special education transportation support for approximately 51 (or approximately 18.54%) of its 239 special education students, whose IEPs include transportation as a related service. This is higher than the average of 10% found in most districts reviewed by FCMAT. This total does not include approximately 36 preschoolers. This special education transportation is composed of the following specific services:

- Ten special education students are transported on a dedicated school bus operated by the high school district.
- Eleven special education students are transported on a district-supplied nine-passenger van operated by one of the district's instructional aides.
- Twenty-eight special education students, thirteen of whom are preschool students, are transported by the county office of education on a school bus
- Two students are transported under contract with their nonpublic school service provider.

The district does not use a transportation decision tree or a transportation request form when identifying students as eligible for special education transportation. This may not seem necessary given the small number of special education students transported; however, using a decision tree can help IEP teams when there is a difference of opinion regarding transportation. A decision tree and transportation request form would help both the district and the high school district ensure that transportation services are provided in the least restrictive manner. An example of a decision tree is included in the appendices.

Communication regarding special education transportation services is informal, usually consisting of telephone calls and/or emails. Important information about a student's disability as it relates to transportation, personal address information, and other needed information is not systematically tracked. The district would benefit from implementing the special education decision tree and transportation request form mentioned above during a student's IEP meeting.

The district provides a high level of non-mandated home-to-school transportation for its general education students. The district's Board Policy 3540, adopted March 8, 2005, establishes nontransportation zones as follows:

- Kindergarten through Grade 3: 3/4 mile
- Grades 4 through 8: 1 mile
- Grades 9 through 12: 2 miles (high school district)

Documents from Red Bluff Union High School District indicate that approximately 17 school bus stops that serve approximately 113 students are within these board-established nontransportation zones. In addition, these nontransportation zones are smaller than those of many districts

of similar size and structure. The district could consider expanding these to one mile for kindergarten through grade 3 and 1.5 miles for grades 4-8 to further reduce costs.

School transportation is severely underfunded in California. Until 1977, California fully reimbursed school districts for their reported operating costs (though not capital costs) in the subsequent fiscal year. From 1977 to 1982 the state began reducing the percentage of the reimbursement, and in the 1982-83 school year it limited the funding to the amount school entities received that year, which was 80% of costs. In the years since, the state has only occasionally granted a cost of living adjustment (COLA) to the funding. Prior to the 2008-09 school year, the state was funding approximately 45% of the reported transportation expense. The state further reduced the apportionment by 19.84% in 2009-10, by 19.81% in 2010-11, and by 19.8352% in 2011-12. Funding for 2012-13 remained the same as in 2011-12. The state now funds only approximately 35% of school transportation costs.

The Annual Report of Pupil Transportation (form TRAN, also known as the TRAN report) is the report local educational agencies (LEAs) submit to the California Department of Education's (CDE's) finance division to show approved transportation expenses. The report is divided into two sections to allow home-to-school transportation data and data on transportation of severely disabled or orthopedically impaired students to be accurately reported.

The TRAN report is the only document that provides objective criteria to accurately identify an LEA's transportation history and expenses for state-approved revenue reimbursement. Therefore, it is vital that this report accurately indicate the resources used, number of students transported and miles driven so that reimbursement can be obtained. Regardless of whether full funding is available, the report should indicate transportation services provided to students.

According to the district's most recent State TRAN report, the district has an approved home-to-school transportation expense of \$699,630.92 and will receive \$259,404 in revenue. The district does not receive special education funding under resource 7240; the county office is receiving all county and district special education funding for the transportation it provides for special education students.

Recommendations

The district should:

1. Establish a special education decision tree and transportation request form, and use these during IEP meetings.
2. Adhere to its established board policy regarding nontransportation zones for non-mandated home-to-school transportation to reduce costs.
3. Review its nontransportation zones for non-mandated home-to-school transportation and consider expanding them to achieve further cost savings.

Cooperative Transportation Contract

The district's cooperative contract with the Red Bluff Joint Union High School District has gone without major alteration since its inception in 1986. With the exception of annual renewals, the contract provides that the elementary school district will be charged based on the percentage of total miles driven and total students transported for the elementary district. This mixed rate approach benefits both the high school and elementary school districts by commingling both districts' students, many of whom reside within the same geographic areas.

The formula being used to develop the cost for the elementary district applies an annual driver expense that includes health and welfare benefits and a \$2.00 per mile fee for the miles the percentage calculation identifies for the elementary district. If a dedicated bus is operated for the elementary district, the full or actual cost is charged. The high school district operates a total of 14 bus routes, 11 of which are charged based on the mixed use formula and one of which is dedicated for transporting the elementary district's special education students.

The high school district operates 21 buses in the combined fleet; the elementary district owns 10 of these buses. The elementary district is charged for vehicle maintenance based on the mechanic's time, including health and welfare benefits, and is charged for parts at actual cost plus a 10% markup. The high school district does not apply an external labor rate, which is beneficial to the elementary district.

An indirect service fee is applied, but the exact breakdown of this fee was not readily apparent. The elementary district pays for its own insurance coverage on its 10 buses; however, the high school district's annual invoice reconciliation appears to show a charge for insurance coverage. The district should further investigate their annual billing to ensure that the high school district is not inadvertently charging an insurance expense.

Documents for the 2011-12 school year indicate that the district was charged for 33.27% of the total miles and 50.16% of the total driver time. The district's students made up approximately 54.99% of the total students transported. Invoices for fiscal year 2011-12 indicate a driver rate of \$25.51 per hour, with an overtime rate of \$38.27 per hour. A cost of \$2.00 per mile was applied, as was a cost of \$55.00 per hour for vehicle maintenance.

The district's staff do not have a clear and accurate understanding of the cooperative transportation contract, and this is amplified by the lack of clear communication between the district and the high school district. Some of the invoices the high school district submits lack detail, which has caused some confusion and misunderstanding.

The two districts do not meet annually to discuss service issues of interest, plan levels of service for the upcoming year, and seek to understand the challenges each district faces because of conflicting starting and ending times for the school day. The elementary and high school district need to meet once or twice a year to discuss their cooperative transportation agreement and to plan.

During fieldwork, FCMAT observed a meeting of the two districts to update their cooperative transportation agreement, and discuss the suggested formula for services and the challenges the high school district faces in providing service support. The formula for the suggested contract update remains the same, with only moderate increases suggested in the labor rates for drivers and in vehicle maintenance support. An increase from \$2.00 to \$3.00 per mile was recommended, along with an annually assessed administrative oversight support charge. The mixed formula approach is being maintained when the high school district can commingle services. Any buses dedicated solely for transporting elementary students will result in the actual expense being

charged to the elementary district. This draft updated cooperative transportation agreement is beneficial to the elementary school district.

The high school district identified approximately 17 school bus stops that are within the nontransportation zones set by the elementary school district in its Board Policy 3540. These stops serve approximately 113 students. The high school district is recommending that these bus stops be eliminated, which would likely eliminate one school bus route.

The district benefits from its cooperative transportation contract with the high school district for home-to-school, special education and field trip transportation, and vehicle maintenance support services. The high school district also benefits from the sharing of operational expense for bus routes that serve students from both districts. The cooperative venture is an excellent example of cost containment for both school districts.

Recommendations

The district should:

1. Review the high school district's transportation invoicing to ensure that pass-through expense for insurance coverage is not being applied.
2. Annually review its cooperative transportation contract with the high school district and establish an appendix page with the annual reassessment of hourly driver cost, mileage rate and vehicle maintenance cost hourly rate.
3. Institute an annual or biannual transportation planning session with the high school district to discuss items of mutual interest and benefit.
4. Identify and use a detailed billing format that both districts are comfortable with that includes desired information such as passenger counts, mileage and driver percentages assessed to the elementary district, and vehicle maintenance attributed to the district's buses.
5. Renew its cooperative transportation contract with the high school district.

Bus Fleet

The district owns ten school buses that are operated and maintained by the high school district. An underlying principle of the cooperative transportation contract with the high school district is the benefit of a shared school bus fleet. Both the elementary and high school district share equitably in supporting the bus fleet, which is used to transport both high school and elementary school students.

The fleet is aging and includes four buses that need to be replaced or taken out of service by January 1, 2014, in part because of the Truck and Bus Regulation Compliance Requirements approved by the California Environmental Protection Agency's (CEPA's) Air Resources Board in December 2010.

At the time of fieldwork, the San Joaquin Valley Air Pollution Control District (SJVAPCD) was accepting grant applications for school bus replacement, but the application was scheduled to close on June 1, 2013. Because the elementary district and high school district independently hold title to their individual vehicles, each district is eligible to participate in the grant process. The district needs to immediately apply for any funding or match funding available through the SJVAPCD for school bus purchases.

The average age of the district's buses is 16 years and the average mileage is 183,615. The average age of the high school district's buses is 17 years and the average mileage is 216,967. The combined fleet has an average age of 17 years and an average mileage of 200,290. The age of the fleet presents a significant financial challenge for both school districts.

A list of the combined fleet is located in the appendices. To mitigate the cost of meeting the CEPA's Air Resources Board's requirements for bus replacement while still meeting both districts' transportation needs, five buses could be placed out of service, which would reduce to four or five the total buses that need immediate replacement. This would require the elementary school district to immediately plan for the replacement of 2.5 buses.

Recommendations

The district should:

1. Immediately research and apply for school bus matching or replacement funding through the SJVAPCD grant.
2. Collaborate with the high school district to determine how many buses could be placed out of service to mitigate the cost of meeting the CEPA's Air Resources Board's requirements.
3. Plan to replace two to three buses in fiscal year 2013-14.

Staffing and Caseloads

The district's collective bargaining agreement with certificated staff addresses class size in both the general education classrooms and special day classes (SDCs). The contract specifies a maximum of 12 students in an SDC, and addresses situations in which SDCs exceed the 12-student maximum. The contract states the following:

Whenever a situation exists that makes it impractical or financially undesirable to relieve oversized classes, the Board commits itself to search for a means of alleviating the situation including the possible employment of Instructional Assistants on a temporary basis.

The district employs two different types of instructional aides and has separate job descriptions for each. The first type has the title Paraprofessional – Special Education and has typical instructional aide responsibilities including assisting with instruction; providing academic and behavior support; assisting with test administration; and providing supervision of students. The second type has the title Paraprofessional – Special Needs and has job duties similar to those of the Paraprofessional-Special Education as well as additional duties related to supporting students' physical needs. These additional duties include providing assistance with eating; physically moving students who are unable to do so independently; and performing hygiene procedures such as toileting and changing diapers. In addition, this job description requires the employee to have a valid California driver's license and undergo a physical examination given by the employer.

The job descriptions for both positions are similar except for the paraprofessional – special needs position's additional duties related to students' physical needs and driver's license and physical examination requirements. Both positions receive the same rate of pay.

Staff indicated that regardless of the above job descriptions and classifications, the majority of instructional aides perform the same duties daily. Some instructional aides in both job classifications are given split assignments that divide their daily duties between resource specialist program (RSP) support and SDC support. In addition, although an instructional aide may be assigned to a classroom in which students do not require assistance with their physical needs, when one of these aides is required to cover in an SDC, they are required to perform these additional duties to meet students' needs. Staff reported that having two different position titles creates confusion by implying a false sense of role differentiation when in practice most instructional aides are performing all the duties listed in both job descriptions.

Resource Specialist Teachers (RSP)

The district provided caseload and staffing data from the Special Education Student Information System (SEIS), district-created lists, and via verbal reports. There are discrepancies among these data sources. The district-provided lists and verbal reports indicated that there are four full-time equivalent (FTE) RSP teachers, but SEIS data showed a fifth RSP teacher who is case manager for 11 students. The district-provided lists were used to determine teacher FTEs, and SEIS caseload lists were used to determine the number of students RSP teachers are managing.

The table below indicates that the district has 4.0 FTE RSP teachers. Education Code section 56362 permits a maximum caseload of 28 students per RSP teacher. The district maintains an average RSP caseloads of 27 students per teacher, which is within the Education Code maximum. The caseload average decreases to 24 if the fifth RSP teacher and caseload are included. One of the four RSP teachers listed in the table below has a caseload that is far below the Education Code maximum, and two of the four have caseloads that exceed the maximum. The fifth RSP

teacher has a caseload of 11 students, which is far below the maximum caseload for a full-time teacher.

Resource Specialist Caseload Comparison

| Program | Teacher FTEs | Caseload | District Caseload Average | Education Code Maximum Caseload (EC 56362) |
|-----------------------------|--------------|----------|---------------------------|--|
| Resource Specialist Program | 4* | 109 | 27 | 28 |

*This includes one teacher at six hours per day at Bidwell; two teachers at three hours per day at Jackson; one teacher at three hours per day at Meteer; and one teacher at three hours per day at Vista.

The district indicated that it plans to hire one additional RSP teacher for the 2013-14 school year. Based on the number of teachers currently employed, including the fifth RSP teacher, an additional teacher is not needed to comply with the Education Code's caseload requirements. It would be prudent for the district to consider redistributing the caseloads of its existing teachers so that all four teachers have caseloads that are within the Education Code maximum.

According to SEIS caseload data, one RSP teacher serves students at five separate school sites. This can be inefficient and requires travel time for teachers. It is important for the district to assign caseloads that are both within the Education Code maximums and that minimize the number of sites at which teachers must work.

Five instructional aides are assigned to the RSP program; three of these are classified as Paraprofessional – Special Education, and two as Paraprofessional – Special Needs. One instructional aide works a six-hour day and the remaining four provide three hours of RSP support per day. Two of these four split their day between RSP and SDC, and thus work an additional three hours in the SDC program.

Education Code 56262(6) (f) states, "At least 80 percent of the resource specialists within a local plan shall be provided with an instructional aide." The district has five instructional aides assigned to RSP programs, four of whom work three hours per day in these programs and one of whom works six hours per day. Thus the district's level of instructional aide staffing for RSP is meets the Education Code requirement.

Special Day Class Programs for Students with Mild to Moderate Disabilities

The number of students in the district's SDCs for students with mild to moderate disabilities is within School Services of California's (SSC's) recommended guideline of 12 students per Mild to Moderate SDC for students in grades K-8.

The district provided FCMAT with data to analyze class and caseload size using statutory requirements for mandated services and statewide guidelines. The table below is organized by grade level and by school site. It provides a comparison of the district's average staffing ratios with those established by SSC. These caseload comparisons show total classroom staffing, including instructional aide and teacher-to-student ratios.

Comparison of Mild to Moderate Classified and Certificated Staffing and Caseloads with SSC Caseload Guidelines

| School | Teacher FTEs | No. of Students | District Caseload Averages | SSC Recommended Caseload | I-to-I Aides' Work Hours |
|----------------------------|--------------|-----------------|----------------------------|--------------------------|--------------------------|
| Metteer Elementary | 2 | 24 | 12 Students 3 Aides | 12 Students 1 Aide | 1 6.0-1 |
| Jackson Heights Elementary | 2 | 25 | 12 Students 3 Aides | 12 Students 1 Aide | 2 6.0-2 |
| Bidwell Elementary | 1 | 11 | 11 Students 3 Aides | 12 Students 1 Aide | 1 6.25-1 |
| Vista Middle School | 1 | 14 | 14 Students 2 Aides | 12 Students 1 Aide | 1 3.25-1 |

Source: School Services of California, Inc., 2008

SSC recommends a caseload ratio of one teacher and one instructional aide to 12 students in SDCs for elementary and middle school students with mild to moderate disabilities. The district's average elementary school caseloads for teachers are within the SSC guidelines, with the exception of Bidwell Elementary, which has a lower caseload than the guidelines. All three elementary SDCs have an average of three instructional aides per classroom, which is higher than the SSC guidelines recommend.

The middle school caseload of 14 students is higher than recommended by SSC. The middle school has two paraprofessionals per classroom, which is slightly higher staffing than SSC recommends. However, this may not be excessive because of the larger-than-recommended class size. In addition, the district's bargaining agreement provides for additional instructional aides for SDCs with more than 12 students.

The district uses a written, structured process, including a personnel request form, to determine when additional instructional aide support is warranted; however, this form and process is not used consistently when additional staff are needed or when staffing is changed. This may be contributing to the high number of paraprofessionals assigned to elementary SDCs. It is important to use these forms so that the business department can determine if there are adequate funds for additional staffing in the appropriate budget line.

The district lacks a process for determining the need for continuing additional instructional aide support for a student who moves, is absent for long periods of time, or reaches the age at which they exit the special education program. The district also lacks a process for reducing or phasing out such services, or for tracking and monitoring the use of aides. Staff indicated that aides sometimes move to another location on campus or to another program to support general education students who are not yet identified for special education. This can be costly.

Staff also indicated that instructional aides do not receive adequate training or time to collaborate with teachers. This decreases efficiency and effectiveness.

A high number of students in the district's SDCs have significant behavioral challenges, which may be contributing to the high number of instructional aides assigned to these classes. A more efficient means of addressing behavioral challenges may be to provide behavior intervention services and additional training to instructional aides. These measures provide support to the classroom, increase staff members' abilities and knowledge, and teach students more appropriate behavior.

The instructional aides receive prorated benefits based on the number of hours they work each day. The district also incurs additional costs for instructional aides beyond their contracted time when they provide extra supervision of students who arrive early to school or leave school later, exceeding the contractual requirements. .

The district operates six SDCs in its elementary schools and one SDC at its middle school. Each SDC serves students with a range of disability types. These classes also serve several students with moderate disabilities and some who are considered severely disabled. These students have more intense needs and require additional support. Instructional aide assignments are an area in which the district could reduce costs by more closely aligning this staffing with the SSC guidelines.

It is important to consider the intensity of students' needs before determining if a decrease in SDC paraprofessional staffing is warranted. If the district chooses to reduce instructional aide staffing, it could realize a potential cost savings of approximately \$30,000 per full time paraprofessional. The efficiency of instructional aide support could also be increased by providing training and support that gives instructional aides the knowledge and skills to efficiently and effectively carry out their duties.

Comparison of Mild to Moderate SDC Class Sizes with Class Size Maximums from the District's Collective Bargaining Agreement

| School | Teacher FTEs | No of Students | District Class Size Averages | District Collective Bargaining Agreement Maximum Class Size |
|----------------------------|--------------|----------------|------------------------------|---|
| Metteer Elementary | 2 | 24 | 12 | 12 |
| Jackson Heights Elementary | 2 | 25 | 12 | 12 |
| Bidwell Elementary | 1 | 11 | 11 | 12 |
| Vista Middle School | 1 | 14 | 14 | 12 |

The collective bargaining agreement with certificated staff establishes a maximum of 12 students per SDC. The three elementary schools are at or below this maximum, and the middle school class size exceeds this maximum by two students; however, this is addressed by providing this class with two instructional aides, in accordance with the bargaining agreement.

SDC Students' Disabilities by Category

| Disability Category | Total # in District | Bidwell SDC | Jackson Heights SDC | Metteer SDC | Vista Middle SDC |
|------------------------------|----------------------------|--------------------|----------------------------|--------------------|-------------------------|
| Intellectual Disability | 31 | 2 | 12 | 14 | 3 |
| Autistic-like | 12 | 1 | 7 | 3 | 1 |
| Other Health Impaired | 9 | 1 | 3 | 2 | 3 |
| Specific Learning Disability | 9 | 5 | 1 | 1 | 2 |
| Speech/Language Impaired | 5 | 0 | 1 | 3 | 1 |
| Orthopedically Impaired | 3 | 1 | 0 | 1 | 1 |
| Emotional Disturbance | 1 | 0 | 1 | 0 | 0 |
| Multiple Disabilities | 2 | 0 | 0 | 0 | 2 |
| Traumatic Brain Injury | 1 | 0 | 0 | 0 | 1 |
| Visual Impairment | 1 | 1 | 0 | 0 | 0 |
| TOTAL | 74 | 11 | 25 | 24 | 14 |

Although some students in the district's SDCs have moderate or severe disabilities, these classes also have a high number of students with disabilities that are typically considered mild. These students may be able to benefit from a less restrictive placement. For example, approximately nine students in SDC classes are identified in the Specific Learning Disability (SLD) category, and five are identified as speech and language impaired (SLI). Students these disability categories are typically served in resource specialist programs (RSPs) and do not require the restrictiveness of an SDC. Although placement is always an IEP team's decision, the least restrictive environment should always be considered before a student is placed in an SDC.

As the district begins to address overidentification and decrease the number of students in special education, it may be able to reduce the number of its special education teachers.

Staff indicated that at least three of the district's special education students do not reside within the district's boundaries, and although the district receives the average daily attendance (ADA) funding for these students, serving them increases the need for SDCs. The district is reportedly not billing these students' districts of residence for the excess costs it incurs to serve them; this further increases the district's costs. The Tehama County SELPA has a policy that allows a district to bill students' districts of residence for such costs in cases such as these.

Designated Instructional Services

The district has school psychologist and speech and language pathologists on staff to provide these services. The Tehama County SELPA provides additional services to the district and does not bill for them; these services include occupational therapy (OT), orthopedic impairment (OI) specialist, orientation and mobility (O&M) specialist, and adaptive physical education (APE) teacher.

Speech and Language Pathologists

The district provided data from the SEIS and via verbal reports regarding its caseloads for speech and language pathologists (SLPs); however, there were discrepancies between the two data sources. FCMAT used the SEIS data to calculate caseload ratios and compare them to the maximums permitted by Education Code sections 56363.3 and 3051.1(4)(b). The following table shows this data.

Speech and Language Pathologist Caseload Comparison

| Provider | District Total FTE-to-Caseload Ratio | District Average Caseload Ratio | Ed. Code Maximum FTE-to-Caseload Ratio |
|---|--------------------------------------|---------------------------------|--|
| Speech-Language Pathologist-Overall Ratio | 3-to-183 | 1-to-61 | |
| Speech-Language Pathologist-Preschool | 3-to-39 | 1-to-13 | 1-to-40 |
| Speech-Language Pathologist K-8 | 3-to-144 | 1-to-48 | 1-to-55 |

District SLPs have combined caseloads, providing services to students in preschool and grades K-8. As the table above indicates, the district's caseload for students in grades K-8 is 48 students per SLP and for preschool students is 13 students per SLP, both of which are within the Education Code maximums of 55 students and 40 students, respectively. However, each SLP has a combined caseload that includes both preschool and K-12 students, which increases the overall caseload to 61 students per SLP. This ratio exceeds the Education Code maximum.

School Psychologists

The district employs one full-time school psychologist and one school psychologist whose assignment is 0.5 FTE director of special education and 0.5 FTE school psychologist.

School Psychologist Caseload Comparison

| Provider | FTEs | District Average Staffing Ratio | Statewide Staffing Ratio* | Total Ratio |
|--|------|---------------------------------|---------------------------|--------------|
| School Psychologists | 1.5 | 1-to-1,460 | 1-to-1,466 | 1.5-to-2,191 |
| Projected School Psychologists 2013-14 | 2.0 | 1-to-1,096 | 1-to-1,466 | 2-to-2,191 |

*Source: California Education Facts (CalEdFacts), 2010-11

Statewide, the ratio of school psychologists to general education students is 1-to-1,466, as reported by California Department of Education's CalEdFacts (2010-11). The district's ratio is 1-to-1,460, which is comparable to the statewide ratio. However, staff indicated that there have not been sufficient school psychologist services to meet the district's special education assessment and student support needs because the administrative duties of the special education director position require more than the 0.5 FTE allotted for them and consequently psychologist services to schools are lacking. Although the ratios appear adequate, it may not be efficient in practice to have the director providing 0.5 FTE school psychologist services.

The district has hired an additional school psychologist for the 2013-14 school year. If the special education director's administrative duties are increased to full time, this would change the ratio to 1-to-1,096, which is a significantly higher level of staffing than the CalEdFacts ratio guideline of 1-to-1,466.

The district conducts a high number of initial assessments for special education eligibility, but the majority of the students assessed do not meet the eligibility requirements. The table below shows the number of initial assessments conducted in 2011-12 and 2012-13, the number of students who were eligible, and number of students who did not meet the eligibility requirements.

Special Education Initial Evaluations

| School Year | 2011-12 | | 2012-13 | |
|-------------------------|-----------|-----------------|-----------|-----------------|
| Eligibility | Qualified | Did Not Qualify | Qualified | Did Not Qualify |
| No. of Students | 18 | 30 | 17 | 24 |
| Total Students Assessed | 48 | | 41 | |

Of the 48 students assessed in 2011-12, 63% were not eligible for special education services, and of the 41 assessments conducted in 2012-13, 59% of the students were not eligible. These are unusually high percentages; it is likely that many of these referrals for assessment were not appropriate. This is one of the consequences of the district's lack of a tiered system of interventions and supports for students. Without a system of general education interventions and supports, students are more likely to be referred to special education unnecessarily.

The district contracted with an additional school psychologist part time to conduct special education assessments, but this was not indicated in any of the documents provided by the special education department. Special education evaluations, particularly initial evaluations, are time-consuming and costly for both the school psychologist and for the student being assessed. They require the school psychologist to spend hours assessing, writing reports, and attending IEP meetings. The need to hire additional staff to assist with assessments can be particularly costly. The high number of assessments affects not only the school psychologists' workloads and the district's finances, but also students because it requires them to be out of class and miss valuable instruction.

Recommendations

The district should:

1. Consider combining the two classifications of instructional aides under one job title and description.
2. Redistribute RSP teachers' caseloads to bring the caseloads for all teachers into compliance with the Education Code maximum of 28 students, and to minimize the number of sites each teacher serves.
3. Reduce the number of instructional aides assigned to elementary SDCs.
4. Ensure that employees follow the district's process for determining when additional instructional aide support is warranted.
5. Use its personnel request form consistently, and developing a tracking system to monitor when staffing changes occur, including adding staff and reducing staff when students move or exit special education.
6. Provide instructional aides with training to increase their skills and competencies in working with students with disabilities.
7. Provide collaboration time for instructional aides, teachers and support providers.
8. Review the IEPs of students with SLDs to determine if they would be more appropriately served in a less restrictive environment.

9. Use the SELPA's bill-back policy and procedure to bill the districts of residence of students whom it serves but who reside within another district's boundaries.
10. Review its school psychologist-to-student ratio to increase the efficiency of these services.
11. Change the special education referral process to reduce the number of inappropriate referrals.
12. Establish and implement tiered system of interventions and supports for students in general education districtwide to reduce the number of inappropriate referrals for special education services.

Administrative Structure

FCMAT compared the district's special education administrative structure with that of four other districts of comparable size: Corning Union, Soquel Union, Taft City and Kingsburg Charter. The average administrative staffing in the comparison districts is 0.8 FTE, and two of the four have a full-time director of special education. The district's special education director is 0.5 FTE, with an additional 0.5 FTE school psychologist assignment; however, as discussed above, increases in referrals, evaluations and the need for psychologist services limits the time the director has available to fulfill the 0.5 FTE allocated time for administration, and no clerical support is provided for this function.

Administrative Staffing Comparison

| 2011-12 ADA | District | Special Education Administrative Structure |
|-------------|---|--|
| 1933 | Corning Union Elementary (Tehama County) | .50 FTE School Psychologist |
| 1879 | Soquel Union Elementary (Santa Cruz County) | 1.0 Director |
| 2191 | Red Bluff Union Elementary (Tehama County) | 0.5 Director |
| 2091 | Taft City (Kern County) | 1.0 Program Specialist |
| 2347 | Kingsburg Elementary Charter (Fresno County) | .50 Director |

The district's principals and staff reported that there is insufficient training and support for both administrators and special education instructional staff. Because of workload responsibilities, the director is unable to attend important SELPA meetings regularly, and as a result the district lacks clear articulation of and support for procedural and program issues. There are no formal meetings of employees with similar jobs (known as job-alike meetings) or special education meetings for teachers to receive training and information regarding procedures, updates, curriculum or instruction. The special education department lacks a universal curriculum and at the time of fieldwork had a backlog of more than 30 evaluations could not be completed within legal deadlines before the end of the 2012-13 school year.

The district lacks effective communication systems to ensure ongoing coordination among the human resources, transportation and business departments, and this affects program efficiency. In addition, the lack of a process for identifying necessary resources and monitoring their use, in particular the use of instructional and 1-to-1 aides as discussed previously in this report, has created a lack of position control in special education. This increases the district's special education costs over time.

The district has no ongoing process for coordination between the business and special education departments regarding the budget, including development of a projected annual budget and ongoing budget increases for student and program needs.

Recommendations

The district should:

1. To create an alternate administrative structure that better supports special education and increases program efficiency, consider doing the following:

- Adding a 1.0 FTE director of special education position that reports directly to and is evaluated by the assistant superintendent. Ensure that this position has the authority to oversee and make decisions regarding special education program operations, including supervisory responsibility over the counselor, psychologists, nurse and speech therapists. This position should also be the primary contact for all special education matters. This position could be created using existing resources.
 - Providing 0.5 FTE confidential clerical support for special education and 0.5 FTE for human resources
 - Adding a teacher on special assignment (TOSA) position to assist with training, statewide testing, Medi-Cal, transportation and other special education needs.
2. Provide principals with training and support to help them better understand the special education evaluation process.

1-to-1 Instructional Aides

The district does not have a procedural manual for any of its instructional aides, including the 1-to-1 aides. Establishing policies and procedures is important to help staff know expectations, how to carry out job duties, and work efficiently and effectively. A lack of standard procedures can result in a lack of consistency across special education programs.

The district has developed forms and guidelines to determine the need for a 1-to-1 aide. They include a student needs rubric. The Tehama County SELPA is also developing procedures for requesting additional aide support. These procedures include observations, data collection, an independence plan, a flow chart, and a school day analysis. The school day analysis enables an IEP team to determine if and when during a school day a student needs additional support, and if there are natural supports available that may mitigate the need to add support.

The best practice for ensuring that these types of guidelines are followed is to provide mandatory training for administrators and general and special education staff.

Guidelines can help staff determine the following:

- The need for additional aides
- Dependence factors
- Measurable outcomes
- Descriptors of success
- Alternatives to aides
- Whether existing resources are being used optimally
- The need to continue services
- The need to increase or decrease aide hours

Whenever either a 1-to-1 aide or an additional classroom support aide is included in a student's IEP, it is important to have a plan and goals for reducing and/or eventually eliminating the additional support (known as fading plans) in order to increase a student's independence. This helps ensure that all staff, the family, and the student are working toward the same goal of independence and student success.

The district does not have a policy including written goals or a fading plan in the IEP. Fading of 1-to-1 aides is discussed during IEP meetings, but it is documented only in the notes page of the IEP.

The district has eight 1-to-1 aides, six of whom are in a special day class that already has several aides assigned. Two of these six aides are assigned to students whose residences are outside of the district's boundaries; therefore, these students' respective districts of residence are responsible for the cost of these positions.

One of the remaining two 1-to-1 aides is assigned to a student in the general education program, and the other is a county office employee who works as an intensive behavior aide. The district is responsible for a percentage of the cost of the latter position based on county office rates.

Although the district has implemented procedures regarding assigning 1-to-1 aides, these assignments are not revisited during the annual review or when the student transfers to the next

grade level. Because students' needs change, it is important to review the need for the additional support regularly.

The district has an unwritten guideline that a 1-to-1 aide is not to work exclusively with the same assigned student. A student is always to have the required aide support, but not always provided by the same person. This promotes more student independence.

The district's aides do not have a handbook to assist them in working with special needs students, and the aides assigned as 1-to-1 aides have not received any specialized training in how to work with their student. In addition, instructional aides have not received training in behavioral techniques or other techniques that would increase their skills. Providing training for all aides may help reduce the number of additional classroom support aides or 1-to-1 aides. The Tehama County SELPA's document library includes aide handbooks and training modules that the SELPA can make available to the district.

The district has weekly minimum days, during which the aides are on school campuses without students. Staff indicated that during this time aides complete tasks assigned by their teachers. Training could be scheduled during this time without incurring additional costs.

Recommendations

The district should:

1. Continue to use its guidelines to determine the need for a 1-to-1 or additional classroom support aide until the SELPA procedures are completed and approved.
2. Once the SELPA guidelines are approved, use those forms to determine the need for 1-to-1 or additional classroom support aide.
3. Develop fading plans and goals for independence whenever a 1-to-1 or additional classroom support aide is included in a student's IEP.
4. Review the need for each 1-to-1 or additional classroom support aide annually based on the guidelines.
5. Ensure that all staff are trained in the guidelines so that there is consistency and accuracy in completing IEPs.
6. Provide all aides with training in behavior and other identified areas of need monthly to improve their skills and reduce the need for 1-to-1 and additional classroom support aides.

Appendices

Appendix A

Sample Transportation Request Form and Decision Tree

Appendix B

Combined Bus Fleet List

Appendix C

Sample ESY Decision Tree

Appendix D

Study Agreement

Appendix A

Sample Transportation Request Form and Decision Tree

Sample Transportation Request Form

- ☐ Special Education
☐ 504
☐ No Child Left Behind

Poway Unified School District
 Special Education
 13626 Twin Peaks Road, Poway CA 92064

- ☐ Start _____
☐ Change _____
☐ Continue _____

TRANSPORTATION REQUEST

PLEASE PRINT CLEARLY

| | | | | | | |
|-------------------------|----|---|--------------|-------------------------|------------|---|
| Student Name | | Parents Name | | Home Phone | Work Phone | Cell Phone |
| Address | | Apartment Name and number | | TRANSPORTATION REQUIRED | | |
| City | | Zip | SCHOOL HOURS | | YES | |
| Name of Special Program | | Birthdate | Grade | From | To | |
| School | | Address | | School Phone Number | | |
| YES | NO | FACTORS AFFECTING TRANSPORTATION | | EXPLANATIONS | | |
| | | CAN WALK TO/FROM A DESIGNATED BUS STOP <input type="checkbox"/> Gated Community/Apartment Complex may not be accessible. | | | | ** HOME-SCHOOL-HOME <input type="checkbox"/> |
| | | Wheelchair dependent | | | | HOME-SCHOOL-SITTER <input type="checkbox"/> |
| | | Walker dependent | | | | SITTER-SCHOOL-HOME <input type="checkbox"/> |
| | | Requires assistance loading/unloading | | | | SITTER-SCHOOL-SITTER <input type="checkbox"/> |
| | | Safety Vest | | | | HOME TO SCHOOL <input type="checkbox"/> |
| | | Special Aide/Nurse required | | | | SITTER TO SCHOOL <input type="checkbox"/> |
| | | Must be met at Residence or School | | | | SCHOOL TO HOME <input type="checkbox"/> |
| | | Possible Problem with other children | | | | SCHOOL TO SITTER <input type="checkbox"/> |
| | | Diabetic | | | | |
| | | Subject to Seizures | | | | |
| | | Requires Medication | | | | |
| | | Special Equipment | | | | |
| | | Oxygen | | | | |
| | | Trach/Gast Tube | | | | |
| | | Restraints | | | | |
| | | Suction machine | | | | |
| | | Other | | | | |
| | | Other | | | | |

REASON OR TRANSPORTATION

- ☐ Placement away from Home School ☐ Student Disability

Signature (Special Education/Health Services)

Date

PARENTAL RELEASE SIGNATURE

I AGREE TO HOLD HARMLESS AND INDEMNIFY THE POWAY UNIFIED SCHOOL DISTRICT, ITS EMPLOYEES, AND ITS AGENTS FROM ANY CLAIM OR DEMAND WHICH MAY BE MADE BY REASON OF MY AUTHORIZATION TO ALLOW MY CHILD TO WAIT FOR AND/OR LEAVE THE SCHOOL BUS AT A PREARRANGED LOCATION.

Parent Signature

Date

EMERGENCY POINTS OF CONTACT AND RESPONSIBLE PARTIES

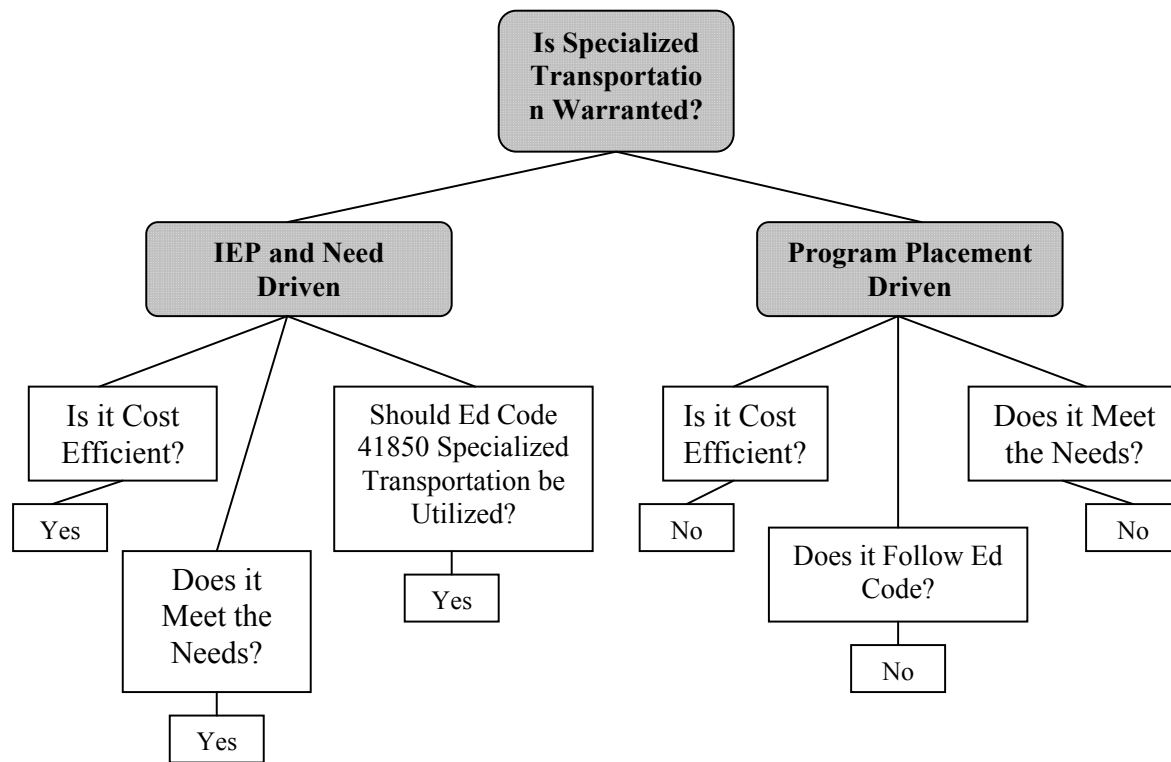
IN CASE OF EMERGENCY, OR IF WE ARE UNABLE TO DELIVER YOUR CHILD TO YOU WE WILL ATTEMPT TO CONTACT THE FOLLOWING PEOPLE YOU DESIGNATE AS EMERGENCY POINTS OF CONTACT. IF WE ARE STILL UNABLE TO DELIVER YOUR CHILD, WE WILL DELIVER YOUR CHILD TO EITHER THE; POWAY SHERIFFS DEPARTMENT OR SAN DIEGO POLICE DEPARTMENT FOR SAFE KEEPING.

| | | | | | |
|-------------------------|--------------|-------------|------|--------------|-----------|
| Name | Relationship | Telephone | Name | Relationship | Telephone |
| TRANSPORTATION USE ONLY | | | | | |
| EDU LOG NO. | | AM STOP NO. | | PM STOP NO. | |

T-7A (rev 9-09)

Distribution: WHITE- Transportation YELLOW- Speced Cum File PINK- Parent

Transportation Decision Tree



Appendix B

Combined Bus Fleet List

Combined RBJUHS & RBUESD Bus Fleets May 2013 (arranged from district provided source data)

Bus#6 1995 International Bluebird 27 pass or 13 pass 5 wheel chairs
196,232 mi.
Tehama County Dept. of Education

CARB Compliant . Retrofitted with Cleaire Horizon DPF Unit.

Bus#7 1991 Thomas, 87 pass
314,184 mi.
RBJUHS Transportation

CARB Non-Compliant. Must be retrofitted with DPF Unit or replaced by January 1, 2014.

Bus#8 1993 Thomas, 78 pass
318,098 mi.
RBJUHS Transportation

CARB Non-Compliant. Must be retrofitted with DPF Unit or replaced by January 1, 2014.

Bus#9 1993 Thomas, 87 pass
366,192 mi.
RBJUHS Transportation

CARB Non-Compliant. Must be retrofitted with DPF Unit or replaced by January 1, 2014.

Bus#10 1999 Thomas, 87 pass
242,762 mi.
RBJUHS Transportation

CARB Compliant. Retrofitted with a Engine Control Systems DPF Unit.

Bus#11 2004 Thomas, 87 pass
166,318 mi.
RBJUHS Transportation

CARB Compliant. Retrofitted with a Engine Control Systems DPF Unit.

Bus #12 2010 Thomas, 80 pass
45,200 mi.
RBJUHS Transportation

CARB Compliant. Meets 2010 CARB Regulations.

Bus #40 1999 Thomas, 87 pass
152,537 mi.
Red Bluff Union School District

CARB Compliant. Retrofitted with Engine Control Systems, DPF Unit.

Bus #41 2013 Thomas, 82 pass
25,587 mi.
Red Bluff Union School District

CARB Compliant. Meets 2010 CARB Regulations.

Bus #42 2013 Thomas, 33 Pass Wheel Chair
15,596 mi.
Red Bluff Union School District

CARB Compliant. Meets 2010 CARB Regulations.

Bus #44 1987 Gillig, 87 Pass
196,344 mi.
Red Bluff Union School District

No DPF Unit available for engine; must be removed from service by January 1, 2018.

Bus #45 1987 Gillig, 87 pass
342,581 mi.
Red Bluff Union School District

No DPF Unit available for engine; must be removed from service by January 1, 2018.

Bus #46 1987 Gillig, 87 pass
153,124 mi.
Red Bluff Union School District

No DPF Unit available for engine; must be removed from service by January 1, 2018.

Bus #47 1991 Thomas, 87 pass
225,889 mi
Red Bluff Union School District

CARB Non-Compliant. Must be retrofitted with DPF Unit or replaced by January 1, 2014.

Bus #48 1993 Thomas, 78 pass
229,814 mi.
Red Bluff Union School District

CARB Non-Compliant. Must be retrofitted with DPF Unit or replaced by January 1, 2014.

Bus #49 1993 Thomas, 87 pass
291,704 mi.
Red Bluff Union School District

CARB Non-Compliant. Must be retrofitted with DPF Unit or replaced by January 1, 2014.

Bus #50 2004 Thomas, 87 Pass
202,971 mi.
Red Bluff Union School District

CARB Compliant. Retrofitted with Engine Control Systems, DPF Unit.

Bus #51 2007 Thomas C2 21 pass Wheel Chair
97,431 mi
RBUJHS Transportation

CARB Compliant. Meets 2007 CARB Regulations.

Bus #67 1987 Gillig, 87 pass
250,595 mi.
RBUJHS Transportation

No DPF Unit available for engine; must be removed from service by January 1, 2018.

Bus #68 1987 Gillig, 87 pass
282,368 mi.
RBUJHS Transportation

No DPF Unit available for engine; must be removed from service by January 1, 2018.

Bus #69 1988 ford E350, Bus 20 Pass
86,524 mi.
RBJUHS Transportation

Under 14,000 GVW. No requirements from CARB.

Appendix C

Sample ESY Decision Tree

**RIVERSIDE COUNTY SPECIAL EDUCATION LOCAL PLAN AREA (SELPA)
DETERMINATION OF NEED FOR ESY SERVICES WORKSHEET**

The use and distribution of this form is limited to employees of public school agencies within the Riverside County Special Education Local Plan Area (SELPA)

Student Name: _____ **D. O.B.** __ / __ / ____ **Grade:** _____

School: _____ **District:** _____

Regular School Year Special Education Services: _____

1. MULTIPLE CRITERIA CONSIDERATIONS IN ALL AREAS OF NEED

Teacher Observations:

Running Records:

Benchmark Measures:

Progress Toward Goals/Objectives:

Evidence of Regression Following Break:

Evidence of Difficulty Recouping Information Following Break:

Consideration of Other Options Available:

Other Factors:

RIVERSIDE COUNTY SPECIAL EDUCATION LOCAL PLAN AREA (SELPA) DETERMINATION OF NEED FOR ESY SERVICES WORKSHEET

The use and distribution of this form is limited to employees of public school agencies within the Riverside County Special Education Local Plan Area (SELPA)

Student Name: _____ D. O.B. ____ / ____ / ____ Grade: _____

2. ESY CHECKLIST

YES NO

☐
☐

Nature and/or Severity of Disability

The student demonstrates a severe disability in one or more areas. Without ESY services, will the nature and/or severity of the student's disability prohibit the student from receiving benefit from his/her educational program during the subsequent return to school?

☐
☐

Regression and Recoupment

Is there documentation that without ESY services, the child is likely to lose critical life skills or fail to recover these skills within a reasonable time?

☐
☐

Degree of Progress

Without ESY services, will the student's progress toward IEP goals related to critical life skills be limited in the subsequent return to school?

☐
☐

Emerging Critical Life Skills/Break Through Opportunities

Without ESY services, will the lengthy school break cause significant problems for the student in learning a critical life/school skill?

☐
☐

Interfering Behavior

Without ESY services, will the interruption of programming which addresses interfering behaviors (i.e., stereotypic, ritualistic, aggressive or self injurious behavior) targeted by IEP goal(s) and/or Behavior Support or Intervention Plan be likely to prevent the student from receiving benefit from his/her educational program during the subsequent return to school?

☐
☐

Special Circumstances

Without ESY services, are there any special circumstances that interfere with the student's ability to benefit from his/her educational program during the subsequent return to school?

If yes, explain:

3. IEP TEAM DETERMINATION:

Did the IEP Team answer YES to at least three of the above? ☐ YES ☐ NO

If Yes, ESY services(s) is/are required to provide this student with a free appropriate public education (FAPE). If it determined that the student needs ESY services, complete the ESY services section of the IEP to provide a clear offer of FAPE and services to be provided during ESY.

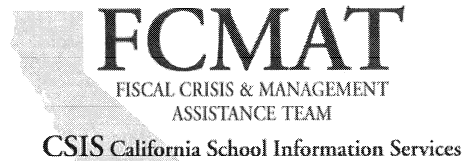
Attach this Determination of Need for ESY Services Worksheet to the student's IEP.

Name of Person Completing Form

Date

Appendix D

Study Agreement



**FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
February 1, 2013**

The Fiscal Crisis and Management Assistance Team (FCMAT), hereinafter referred to as the team, and the Red Bluff Union Elementary School District, hereinafter referred to as the district, mutually agree as follows:

1. BASIS OF AGREEMENT

The team provides a variety of services to school districts and county offices of education upon request. The district has requested that the team assign professionals to study specific aspects of the Red Bluff Union Elementary 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.

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

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

The scope and objectives of this study are to:

1. Analyze the district's special education encroachment on the general fund for the 2011-12 and 2012-13 fiscal years and make recommendations for greater efficiency.
2. Review the overall transportation system for general and special education to ensure efficiency and identify potential cost savings.
3. Review the transportation delivery system, including but not limited to the role of the IEP, routing, scheduling, operations and staffing.

4. Compare the administrative structure and support staff for the special education with districts of comparable size to ensure that the department is sufficiently staffed to support the workload and responsibilities.
5. Provide an analysis of staffing ratios, class and caseload size using statutory requirements for mandated services and statewide guidelines.
6. Determine if the district overidentifies students for special education and assess the impact on identification rates of preschool students transitioning into the district at age five.
7. Examine the use of 1:1 instructional aides and the procedures for identification, placement and fading and make recommendations to improve efficiency.

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 supervisory personnel on the procedures of the team and the purpose and schedule of the study.
2. On-site Review - The team will conduct an on-site review at the district office and at school sites if necessary.
3. Exit Meeting - The team will hold an exit meeting at the conclusion of the on-site review to inform the district of significant findings and recommendations to that point.
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 - Electronic copies of a preliminary draft report will be delivered to the district's administration for review and comment.
6. Final Report - Electronic copies of the final study report will be delivered to the district's administration following completion of the review. Printed copies are available by contacting the FCMAT office.
7. Follow-Up Support – Six months after completion of the study, FCMAT will return to the district, if requested, to assess the district's progress in implementing the recommendations included in the report, at no cost. Status of the recommendations will be documented to the district in a FCMAT management letter.

3. **PROJECT PERSONNEL**

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

- | | |
|--------------------------|---|
| A. Dr. William Gillaspie | FCMAT Deputy Administrative Officer, Project Lead |
| B. JoAnn Murphy | FCMAT Consultant |
| C. Anne Stone | FCMAT Consultant |
| D. Trina Frazier | FCMAT Consultant |
| E. Tim Purvis | FCMAT Consultant |
| F. Mike Rea | FCMAT Consultant |

Other equally qualified staff or 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 per day for each team member while on site, conducting fieldwork at other locations, preparing and presenting reports, or participating in meetings. The cost of independent consultants will be billed at the actual daily rate based on the provisions of Education Code section 84041.
- B. All out-of-pocket expenses, including travel, meals, lodging, etc.
- C. The district will be invoiced at actual costs, with 50% of the estimated cost due following the completion of the on-site review and the remaining amount due upon acceptance of the final report by the district.

Based on the elements noted in section 2 A, the total cost of the study is estimated at \$21,000.

- D. 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**

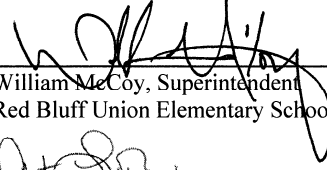
- A. The district will provide office and conference room space while on-site reviews are in progress.
- B. The district will provide the following (if requested):
 - 1. A map of the local area.
 - 2. Existing policies, regulations and prior reports addressing the study scope.
 - 3. Current or proposed organizational charts.
 - 4. Current and two prior years' audit reports.
 - 5. Any documents requested on a supplemental list. Documents requested on the supplemental list should be provided to FCMAT in electronic format. Documents that are only available in hard copy should be scanned by the district and sent to FCMAT in electronic format.
 - 6. All documents should be provided in advance of field work; any delay in the receipt of the requested documentation may affect the start date of the project. Upon approval of the signed study agreement, access will be provided to FCMAT's SharePoint document repository, to which the district shall upload all requested documents.
- C. The district's administration will review a preliminary draft copy of the study. Any comments regarding the accuracy of the data presented in the report or the practicability of the recommendations will be reviewed with the team prior to completion of the final report.


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

6. **PROJECT SCHEDULE**

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

| | |
|-------------------------------|--------------------------------|
| Orientation: | May 14, 2013 |
| Staff Interviews: | May 14-17, 2013 |
| Exit Meeting: | to be determined |
| Preliminary Report Submitted: | to be determined |
| Final Report Submitted: | to be determined |
| Board Presentation: | to be determined, if requested |
| Follow-Up Support: | if requested |

7. **CONTACT PERSON**Name of contact person: William McCoy, SuperintendentTelephone: (530) 527-7200 x111 FAX: _____E-Mail: wmccoy@rbuesd.org

William McCoy, Superintendent
Red Bluff Union Elementary School DistrictApril 15, 2013
Date

Anthony L. Bridges, CFE
Deputy Executive Officer
Fiscal Crisis and Management Assistance TeamFebruary 1, 2013
Date

