



CSIS *California School Information Services*

Vista Unified School District

Special Education Review

July 23, 2012

Joel D. Montero
Chief Executive Officer





CSIS California School Information Services

July 23, 2012

Devin Vodicka, Ed.D., Superintendent
Vista Unified School District
1234 Arcadia Avenue
Vista, CA 92084

Dear Superintendent Vodicka,

In March 2012, the Vista Unified School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for a special education review. Specifically, the agreement stated that FCMAT would perform the following:

Fiscal:

1. Conduct a comparison of the district's special education encroachment on the general fund with districts of comparable size.
2. Review all staffing levels for certified and classified special education employees. Include management level and caseloads per full time equivalent.
3. Compare the percentage of students in nonpublic school to other districts in the SELPA and region and make recommendations for alternative programs.
4. Analyze the allocation model for the NCCSE SELPA and determine if Vista should become its own SELPA.
5. Analyze the infrastructure within the district to support single district status and make recommendations for support ratios to make this transition.
6. Examine the costs of nonpublic agencies and the services provided and make recommendations to reduce costs.
7. Examine high-cost programs such as California Avenue and Sierra Vista and determine if efficiency can be implemented.

Transportation:

1. Review the special education transportation system for efficiency and effectiveness and determine any cost savings.

FCMAT

Joel D. Montero, Chief Executive Officer

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2. Review the overall transportation delivery system, including but not limited to reviewing the role of the IEP, routing, scheduling, operations and staffing.

Program:

1. Determine if the students are over identified for special education and make recommendations for remediation if necessary.
2. Examine the exit rates and referral rates for special education and determine the impact on over identification.
3. Review the special education delivery system and provide recommendations to the district on additional classes or programs that would be necessary if the district's status changes to a single district SELPA.
4. Review state assessment results for special education subgroups and make recommendations on how to improve results.
5. Through classroom and school visitations and interviews review the programs and services available in the district for special education students and determine efficiencies.

This final report contains the study team's findings and recommendations in the above areas of review. We appreciate the opportunity to serve the Vista Unified School District, and extend our thanks to all the staff for their assistance during fieldwork.

Sincerely,

A handwritten signature in black ink, appearing to read "Joel D. Montero". The signature is stylized with a large initial "J" and a long horizontal stroke at the end.

Joel D. Montero
Chief Executive Officer

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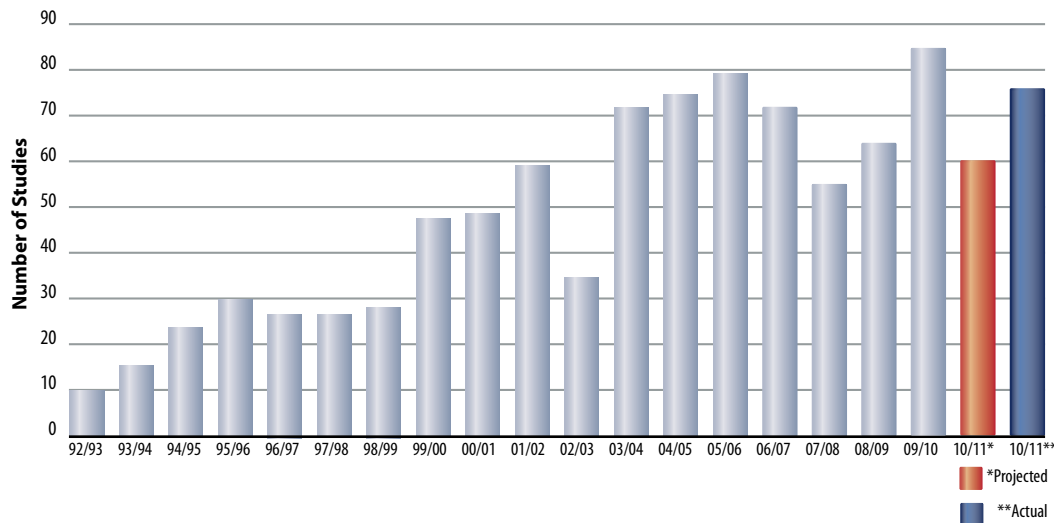
About FCMAT

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

With an enrollment of 22,500, the Vista Unified School District is one of the largest districts in the North Coastal Consortium for Special Education in north San Diego County.

The district projects that a contribution of more than \$14.5 million from the unrestricted general fund to the special education budget will be necessary for the 2011-12 fiscal year. The SELPA operates more than 100 special education programs and services for its 14 member districts, with Vista USD as one of the largest providers of regional programs. The fiscal crisis in California has prompted the district to review options to minimize the effect on its unrestricted general fund.

In March 2012 the district requested FCMAT to review its special education programs and services. The study agreement specifies that FCMAT will perform the following:

Fiscal:

1. Conduct a comparison of the district's special education encroachment on the general fund with districts of comparable size.
2. Review all staffing levels for certified and classified special education employees. Include management level and caseloads per full time equivalent.
3. Compare the percentage of students in nonpublic school to other districts in the SELPA and region and make recommendations for alternative programs.
4. Analyze the allocation model for the NCCSE SELPA and determine if Vista should become its own SELPA.
5. Analyze the infrastructure within the district to support single district status and make recommendations for support ratios to make this transition.
6. Examine the costs of nonpublic agencies and the services provided and make recommendations to reduce costs.
7. Examine high-cost programs such as California Avenue and Sierra Vista and determine if efficiency can be implemented.

Transportation:

1. Review the special education transportation system for efficiency and effectiveness and determine any cost savings.
2. Review the overall transportation delivery system, including but not limited to reviewing the role of the IEP, routing, scheduling, operations and staffing.

Program:

1. Determine if the students are over identified for special education and make recommendations for remediation if necessary.
2. Examine the exit rates and referral rates for special education and determine the impact on over identification.
3. Review the special education delivery system and provide recommendations to the district on additional classes or programs that would be necessary if the district's status changes to a single district SELPA.
4. Review state assessment results for special education subgroups and make recommendations on how to improve results.
5. Through classroom and school visitations and interviews review the programs and services available in the district for special education students and determine efficiencies.

Study Team

The study team was composed of the following members:

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

Study Guidelines

FCMAT visited the district on April 16 – 20, 2012, to conduct interviews, collect data and review documents. This report is the result of those activities and is divided into the following sections:

- Executive Summary
- Fiscal Analysis
- Staffing and Caseloads
- Nonpublic Schools and Agencies (NPS/NPA)
- Single-District SELPA
- Infrastructure
- Program Efficiency
- Transportation

Executive Summary

Vista USD contributes a greater portion of its unrestricted general funds to special education than two districts of comparable size elsewhere in California and three of its neighboring districts in the North Coastal Consortium of Special Education (NCCSE), of those FCMAT used for comparison purposes.

Two separate factors control the level of unrestricted funds that must be expended for special education programs and services. The first factor is the identification rate of disabled students and the extent of the services they receive outside the general education classroom. The second factor is the difference between federal, state and local funding and the excess costs for special education services. Unrestricted funds must be used to pay for the funding shortfall and balance the special education budget.

The district operates its programs and services on a traditional model with resource specialist programs and special day classes. Caseloads for certificated staff are within statewide guidelines and Education Code requirements. However, the nonseverely handicapped classes are overstaffed with instructional aides compared to other districts, resulting in an excess cost of \$480,000.

The district overidentifies students for special education. Its identification rate for disabled students (K-12) is 11.79% compared to a statewide average of 10%.

The district lacks a comprehensive level of intervention for students at risk prior to referral for special education. Attempts have been made to establish a Response to Intervention model, but it is not applied consistently across the school sites. The district has limited options for non-English speaking students, which results in referrals to special education.

A redesign of program offerings, such as a learning center model, would increase opportunities for students to be educated in their home schools. In addition, it could eliminate approximately 10 bus routes and decrease transportation costs as much as \$540,000.

The district rate of nonpublic school enrollment is .24%, which is slightly higher than other districts in the SELPA but not significant. Greater efficiency can be achieved by reducing both program and transportation costs by developing alternative program and service options in lieu of nonpublic school enrollment.

The district's current cost for nonpublic agency (NPA) services is \$2,193,712. There are valid reasons to use NPA services; however, the district should always monitor these expenditures and ensure that whenever possible, district staff is utilized.

NCCSE has finalized a new allocation model to be implemented in the 2012-13 fiscal year. If Vista USD became a single-district SELPA, it would receive the same average daily attendance base rate and supplement that it would receive as a SELPA member. The district will need to review this carefully when the new allocation model is implemented for factors such as growth or decline in district enrollment, the effect of charter schools on funding and the provision of low incidence programs that will require additional funds to be sent to NCCSE and will increase the demands on the district's SELPA infrastructure.

The district lacks the infrastructure to successfully operate as a single-district SELPA. The superintendent and other administrators have little confidence in the special education management system, which impacts the department's credibility. The staff lack confidence in district administration to give accurate and consistent information. This is further impeded by a lack of defined procedures in all levels of special education operation.

A three-tiered bell schedule could achieve greater efficiency in transporting disabled students. The current schedule is not sufficiently staggered to best utilize the district's transport fleet. An outline is included in this report that would efficiently stagger times and provide a savings of approximately \$120,000 to \$240,000.

Findings and Recommendations

Fiscal Analysis

At the district's request, FCMAT determined that the total amount budgeted by the district for the direct costs of special education in fiscal year 2011-12 was \$41,438,559. Of this amount:

- \$5,015,886 was budgeted for general and other unspecified services such as program administration and supervision, school psychologists and nurses, and facilities and maintenance.
- \$1,408,735 was budgeted to provide services to children of preschool age.
- \$13,302,861 was budgeted to provide special education services to school-age students with severe disabilities (autism, severe intellectual disabilities, emotional disturbance, visual and hearing losses or severe impairments, and severe orthopedic impairments).
- \$21,711,077 was budgeted to provide services to school-age students with nonsevere disabilities (specific learning disabilities, speech, voice, and language development problems, and health impairments).

Additionally, \$798,021 was indirectly charged to special education services for general district support (district administration, business office, human resources, and landscape and building maintenance).

The total expense budget for special education services for fiscal year 2011-12 is \$42,236,580.

The district also asked FCMAT to determine the dollar amount needed from the unrestricted general fund to balance the special education budget. Revenue to fund the excess costs of special education comes from federal IDEA funds, state general funds and local property taxes, along with the local unrestricted general funds necessary to balance the revenue and the total expenditures.

By federal definition, excess costs for special education only begin to accrue after the costs of educating disabled children exceed the district's proportionate share of the average per pupil expenditure calculated for all students. For example, a speech-impaired student spends very little time receiving special education services, so 90% of his/her average per pupil expenditure will be used in general education. On the other hand, the student who spends all of his/her time receiving special education services will use all or nearly all of his/her average per pupil expenditure for the special education he/she receives. Consequently, it is required that a school district's local general fund pay its share of the costs of special education first.

This is the first year that California districts have had to compute the average per pupil expenditure (APPE) cost of special education. Based on the district's total number of school-age students with disabilities (approximately 3,048), previous percent of time receiving special education services (36%), and the prior year's APPE (\$5,416), the threshold for arriving at excess costs is approximately \$5.9 million. The more students identified as having a disability plus the amount of time they spend receiving special education services, the greater the amount the local unrestricted general fund will be required to provide before excess costs begin to accrue.

No provision is made in the state's accounting system to enable a district to specifically budget for this required use of general fund monies.

California's contribution toward the excess costs is based on AB 602 (1997-98), which sets forth the state's mechanism for allocating state aid for special education among the SELPAs. Since then, that mechanism has been adjusted and has eroded the level of funding for SELPAs throughout the state. The amount each district receives is determined by the SELPA, and allocation plans for these funds vary widely throughout the state. Vista USD has budgeted state revenues of \$15,131,522 for fiscal year 2011-12.

Federal assistance primarily comes from IDEA Part B funding. At the outset, IDEA committed to funding 40% of the national excess costs of special education. However, it has never reached 20% in the last 32 years, except 2009-10 when one-time funds brought the level up to 27%. This has resulted in the local general fund having to support a much greater share of the excess costs. The district budgeted \$5,579,694 in federal revenue to assist with the excess costs of special education.

The district has budgeted \$20,711,216 for special education revenue. Subtracting the \$6.4 million calculated above from the \$20,711,216 leaves approximately \$14.5 million required from the local budget to pay the district's share of the excess costs of special education and to balance the special education budget.

Until recently, California has viewed the excess costs of special education as those costs that exceed the state aid and federal local assistance provided for special education. The term given to these excess costs was "encroachment." It was as though the state aid and the federal local assistance were intended to pay for the full costs of special education and if they didn't, then the district had to pay the balance from its unrestricted funds.

Fiscal comparisons among districts largely focused on the total expenditures from local sources. However, current methods focus on the two factors (state and federal revenues) that affect the levels of contribution that each district must make from their unrestricted funds.

The Individuals with Disabilities Education Act (IDEA) is essentially a civil rights act. As such, it assumes that disabled children are entitled to their fair share of the district's resources as students of the district. Therefore, federal IDEA Part B funds can only be used to pay the excess costs of special education. Recently the Office of Special Education Programs of the U.S. Department of Education clarified the term "excess costs" and provided a format for computing them.

CFR §300.16 Excess costs.

Excess costs means those costs that are in excess of the average annual per-student expenditure in an LEA during the preceding school year for an elementary school or secondary school student, as may be appropriate, and that must be computed after deducting:

- (a) Amounts received--
 - (1) Under Part B of the Act;
 - (2) Under Part A of title I of the ESEA; and
 - (3) Under Parts A and B of title III of the ESEA and;
- (b) Any State or local funds expended for programs that would qualify for assistance under any of the parts described in paragraph (a) of this section, but excluding any amounts for capital outlay or debt service.

(Authority: 20 USC 1401(8))

CFR §300.202 Use of amounts.

(a) General. Amounts provided to the LEA under Part B of the Act--

- (1) Must be expended in accordance with the applicable provisions of this part;
- (2) Must be used only to pay the excess costs of providing special education and related services to children with disabilities, consistent with paragraph (b) of this section; and
- (3) Must be used to supplement State, local, and other Federal funds and not to supplant those funds.

(b) Excess cost requirement. (1) General.

(i) The excess cost requirement prevents an LEA from using funds provided under Part B of the Act to pay for all of the costs directly attributable to the education of a child with a disability, subject to paragraph (b)(1)(ii) of this section.

(ii) The excess cost requirement does not prevent an LEA from using Part B funds to pay for all of the costs directly attributable to the education of a child with a disability in any of the ages 3, 4, 5, 18, 19, 20, or 21, if no local or State funds are available for nondisabled children of these ages. However, the LEA must comply with the nonsupplanting and other requirements of this part in providing the education and services for these children.

(2)(i) An LEA meets the excess cost requirement if it has spent at least a minimum average amount for the education of its children with disabilities before funds under Part B of the Act are used.

(ii) The amount described in paragraph (b)(2)(i) of this section is determined in accordance with the definition of excess costs in §300.16. That amount may not include capital outlay or debt service.

(Authority: 20 USC 1413(a)(2)(A))

The district must total all expenditures made for elementary and/or secondary students (including those with disabilities) and then adjust that total by deducting specific expenditures. The adjusted total is then divided by the total K-12 enrollment to arrive at an APPE.

The district must then determine a special education full-time student equivalency (FTSE) based on the time each disabled student spends outside the general education setting receiving special education services. For example, a student in a special class or nonpublic school would be 1.0 special education FTSE under this calculation. A student only receiving speech services twice a week would be about a .05 special education FTSE. A student fully integrated in a general education classroom with a full-time aide would be zero FTSE (he would be 1 FTSE in general education and his full-time aide would be excess cost).

The district then totals the special education FTSE and multiplies that amount by the prior year's APPE to determine the level of unrestricted funds that must be expended. Once that amount is expended, excess costs begin to accrue and IDEA Part B funds can be spent.

The effects of this factor are:

- a higher proportion of disabled students results in a higher level of unrestricted funds that must be used before the district begins to accrue excess costs, and

- the amount of time disabled students spend receiving services outside the general education setting determines the amount of unrestricted funds that must be used before the district begins to accrue excess costs.

FCMAT identified 10 comparable unified school districts in California, but only two responded to the study team's request for information. FCMAT compared the district's special education identification rate and special education FTSE with those of the two responding districts. The information in these tables is derived from data used to calculate the excess costs of special education, the maintenance of effort report known as SEMA, and relevant state data. The form used by the district to calculate its excess cost can be found in Appendix A to this report.

	Vista USD	Comparison District A	Comparison District B
Adjusted total expenditures using IDEA computation	\$139,975,764	\$168,752,300	\$184,595,103
Total K-12 enrollment (all students including disabled)	25,843	26,822	26,574
Average per pupil expenditure (APPE)	\$5,416	\$6,292	\$6,946
Total unduplicated count of disabled students (K-12)	3,048	2,021	2,434
Percentage of K-12 identified as disabled	11.79%	7.53%	9.16%

While the enrollments of the three districts are within 1,000 of each other, there are considerable differences in their adjusted total expenditures (\$30-\$45 million) and less than \$1,600 difference among the average per pupil rates. The identification rate for Vista USD is much higher than the two comparable districts. This will increase the level of APPE that will need to be expended before excess costs begin to accrue.

	Vista USD	Comparison District A	Comparison District B
Full-time student equivalent of disabled students receiving services outside general education settings	1,094.61	666.08	870.05
FTSE as percentage of UDC	35.91%	32.96%	35.75%
Required expenditure of APPE funds before excess cost accrues and IDEA funds can be expended	\$5,928,835	\$4,190,975	\$6,043,367

Vista USD's disabled students spend considerably more time in special education settings than students in the other two districts. As a result, although Vista USD has the lowest APPE rate, it must spend almost \$1 million more than Comparable District A and only \$1.2 million less than Comparable District B to meet the excess cost threshold.

As noted in the following chart, Vista USD must spend 4.24% of its total adjusted expenditures to reach the excess cost standard, while the other two districts only need to expend 2.88% and 3.8% respectively to achieve that goal. This leaves a greater share of their unrestricted funds available for other uses.

The total amount of excess cost that each district expends is determined by subtracting the excess cost threshold amount from each district's total combined state and local expenditures for special education programs and services.

	Vista USD	Comparison District A	Comparison District B
Required expenditure of APPE funds before excess cost accrues and IDEA funds can be expended	\$5,928,835	\$4,190,975	\$6,043,367
Required expenditures as a percentage of total adjusted expenditures	4.24%	2.88%	3.87%
Total combined state and local expenditures for special education	\$34,302,977	\$33,432,632	\$32,507,407
Excess costs of special education	\$28,374,143	\$28,565,247	\$25,371,696
Excess cost per K-12 pupil	\$1,098	\$1,065	\$955
Excess cost as a percentage of APPE	20.27%	16.93%	13.74%
Excess cost per UDC	\$9,309	\$14,134	\$10,424

Although the excess cost per UDC gives the impression that Vista USD has lower costs than its two counterparts, its number of students identified as disabled is much higher than the other two districts.

Vista USD has identified 11.79% of its K-12 enrollment as disabled, while Comparison District A has identified only 7.53% and Comparison District B has identified 9.16%. Vista USD is well above the statewide identification rate of 10% of the school-age population and above districts of comparable size, which significantly affects its special education costs.

While Vista USD's disabled students spend about the same proportion of time receiving education services as those in the comparison districts, the higher identification rate means that a proportionately larger share of Vista USD's APPE, 20.27%, is spent providing special education services. The comparison districts expend much smaller percentages of their APPE, 16.93% and 13.74%, to provide special education services.

FCMAT also compared two of the other three large unified school districts in the northern area of the SELPA, Oceanside USD and Carlsbad USD. The data submitted by San Marcos USD, the third large district in northern NCCSE SELPA, was not complete and couldn't be used for this comparison.

This comparison further shows the demand that is placed on a district's unrestricted funds when it overidentifies students as having a disability. This demand is exacerbated when the district does not sufficiently emphasize placement in the least restrictive environment.

	Vista USD	Oceanside USD	Carlsbad USD
Total expenditures (EDP 365)	\$169,647,138	\$147,540,632	\$82,383,713
Current ADA	21,414	18,707	10,588
Current expense per ADA	\$7,922	\$7,887	\$7,781
Adjusted total expenditures using IDEA computation	\$139,975,764	\$130,597,889	\$70,429,883
Total K-12 enrollment (all students including disabled)	25,843	21,081	11,046
Average per pupil expenditure	\$5,416	\$6,195	\$6,376
Total unduplicated count of disabled students (K-12)	3,048	2,122	989
Percent of K-12 identified as disabled	11.79%	10.07%	8.95%

As noted above, both districts have lower identification rates than Vista USD.

As shown in the table below, Oceanside USD has a much higher exit rate than Vista USD. As a result, although it has a lower identification rate, the resulting effect on the use of APPE funds for special education is greater than in Vista. Carlsbad USD's lower identification and rate of removal results in the least impact on its APPE funds.

	Vista USD	Oceanside USD	Carlsbad USD
FTSE of disabled students receiving services outside general education settings	1,095	1,389	241
FTSE as a percentage of UDC	35.91%	65.48%	24.36%
Required expenditure of APPE funds before excess cost accrues and IDEA funds can be expended	\$5,928,835	\$8,608,025	\$1,535,864

Carlsbad USD requires less of its APPE funds (which are unrestricted) to begin to accrue before excess costs than the other two districts. For that reason, its excess costs per K-12 pupil, per APPE, and per UDC are much higher. However, state aid and federal local assistance are provided to assist the district with those excess costs.

	Vista USD	Oceanside USD	Carlsbad USD
Required expenditure of APPE funds before excess cost accrues and IDEA funds can be expended	\$5,928,835	\$8,608,025	\$1,535,864
Required expenditures as a percentage of total adjusted expenditures	4.24%	6.59%	2.18%
Total combined state and local expenditures for special education	\$34,302,977	\$23,366,935	\$15,741,012
Excess costs of special education	\$28,374,143	\$14,758,911	\$14,205,148
Excess cost per K-12 pupil	\$1,098	\$700	\$1,286
Excess cost as a percentage of APPE	20.27%	11.30%	20.17%
Excess cost per UDC	\$9,309	\$6,955	\$14,363

The following table shows how the excess costs are funded and the source of those funds.

	Vista USD	Oceanside USD	Carlsbad USD
Actual total cost of special education	\$41,268,595	\$28,353,713	\$17,381,381
Required expenditure of APPE funds before excess cost accrues and IDEA funds can be expended	\$5,928,835	\$8,608,025	\$1,535,864
Excess costs of special education	\$35,339,760	\$19,745,688	\$15,845,517
Federal share of excess costs	\$6,965,618	\$4,986,777	\$1,640,369
Remaining excess costs	\$28,374,143	\$14,758,911	\$14,205,148
State share of local costs	\$15,368,000	\$11,207,572	\$4,427,642
Local share of excess costs	\$13,006,143	\$3,551,339	\$9,777,506
Total local only expenditures reported	\$18,934,977	\$12,159,363	\$11,313,370
Total actual local support	\$(5,928,835)	\$(8,608,025)	\$(1,535,864)
Adjust for PCRA	\$5,812,645	\$6,990,113	\$2,584,982
Adjust for required APPE expenditure	\$5,928,835	\$8,608,025	\$1,535,864
Total local only expenditures	\$5,812,645	\$6,990,113	\$2,584,982

The data strongly suggest that, if districts closely monitor their identification rate of disabled students and increase the use of least restrictive settings, they can reduce the need for unrestricted funds for special education purposes without making any other operational changes.

Recommendations

The district should:

1. Review and monitor identification processes to appropriately reduce the identification rate of disabled students.
2. Develop and implement placement criteria that will ensure increased placements in the least restrictive settings.
3. Implement changes to decrease costs and increase program efficiencies (see the Program Efficiency section of this report).
4. Educate all stakeholders regarding the excess costs of special education and its impact on the unrestricted general fund.

Staffing and Caseloads

Resource Specialist Program

The district maintains average caseloads of 23 students in the resource specialist program, which is within the statutory maximum caseload of 28 (Education Code Section 56362).

Education Code 56362 (6) (f) states that “at least 80 percent of the resource specialists within a local plan shall be provided with an instructional aide.” The district exceeds the statutory instructional staffing level by 14 six-hour positions, or \$448,000. In an effort to avoid layoffs the district is reducing instructional aide hours from six to five per day through attrition. This has decreased hours by the equivalent of 2.6 six-hour positions (\$83,000), reducing the excess staffing costs to \$365,000. Currently, 45.6 full-time instructional aides and 16 five-hour aides support resource specialist programs. If the district continues to reduce hours each year, the excess costs will eventually be eliminated.

Special Day Classes

The district operates both severely handicapped and learning handicapped classes for K-12. The average class size for severely handicapped is 11 students and the average class size for learning handicapped is 12.5. These averages are consistent with guidelines established by School Services of California (SSC). The preschool special day classes at California Avenue School will be analyzed in another section of this report.

Instructional aide staffing for severely handicapped classes is consistent with the statewide average reported by SSC; however, the staffing for learning handicapped classes at the elementary exceeds statewide levels. Each class has two six-hour aides, while average staffing is one six-hour aide per class. The additional staffing costs approximately \$480,000. The learning handicapped classes at the middle school and high schools are staffed consistent with SSC guidelines. Additional staffing provided for students requiring 1:1 aides is not included in these calculations.

Average SDC and Instructional Aide Support vs. 2008 SSC Guidelines

SDC Classes/No. of Aides Assigned	SSC Average Students Per Class	Vista Average Students Per Class	SSC Aides Per Class	Vista Aides Per Class
LH/48.8	12-15	13	1 aide (6 hr.)	2 aides (6 hr.)
SH/21	8-10	11	2 aides (6 hr.)	2 aides (6 hr.)

School Psychologists

The ratio of psychologists to general education enrollment in California is 1:1466 as reported by the California Department of Education's (CDE's) CalEdFacts (2010-11). The district ratio is 1:1454. While the district's psychologist staffing is in line with recent practice in California, the staff indicated concern over the lack of pre-referral interventions, potentially increasing the identification rate.

FCMAT found that over a three-year period the number of referrals remained consistent, yet the number of referrals that led to eligibility decreased. As the district engages in strategic planning for special education, the referral and identification rates should be addressed in the context of developing an effective Response to Intervention model.

Referral Rate vs. Eligibility for Special Education (districtwide)

School Year	No. of Referrals	Eligible
2009-10	280	221
2010-11	298	232
2011-12	274	188

The administrative and teaching staff reported that students who are English language learners are often found eligible for special education because of limited resources. At some sites special education is the only option to support these students. Staff also reported that these students are not exited from special education and do not make significant progress while in the program. Initial assessments are not routinely conducted in the student's native language, and until recently triennials were not completed for any secondary-level student. These two factors have contributed to English language learner students being inappropriately placed and kept in special education.

Some students are found eligible for special education when behavior is the primary reason for their lack of success in regular education. Although the assessment teams try to differentiate between behavioral and special education eligibility, pressure from school sites, families and advocates as well as lack of other services have resulted in these students being inappropriately placed in special education.

The district has a student study team (SST) process at each school, but it is inconsistent among schools. Staff reported that in some cases the SST is still considered the gatekeeper for special education assessment. In other cases it is a problem-solving group that only considers special education after specific intensive interventions have been implemented and found to be unsuccessful.

The level of Response to Intervention (RtI) also varies among schools. Schools that are in Program Improvement tend to have funds to support some RtI while other schools do not. All schools have been given curriculum to support students prior to a special education referral, such as the program Language!, but curriculum implementation varies by site.

In some cases the special education teacher provides the RtI intervention. This may mean that only some general education students or only some special education students receive this intervention. If the intervention is designed to move students from just below basic to basic and improve AYP scores, then many special education students who would benefit from the intervention do not have access to it.

Designated Instruction Services

District caseloads for staff providing designated instruction services (DIS) were compared to SSC's recommended guidelines, Education Codes 56441.7(a) and 56363.3 and CBEDS data and outlined in the following table.

Average DIS Caseloads vs. SSC Guidelines and Education Code

DIS Position	SSC Guidelines/ Education Code	District
Speech Therapist	Average 55	50
Occupational Therapist	Average 55	55
Adaptive Physical Education	Average 55	55

The district's caseload numbers fall within the Education Code and SSC guidelines.

Recommendations

The district should:

1. Continue to reduce six-hour instructional aide positions in the Resource Specialist program to five hours per day through attrition to staff instructional support at the mandated level outlined in Education Code Section 56362.
2. Reevaluate the current practice of staffing elementary SDC/LH classes with instructional aides at a level that exceeds statewide averages.
3. Monitor student study teams at each site and ensure that consistent processes, forms and data are used to determine RtI interventions and assessment for special education.
4. Review the RtI plans at each site to ensure more consistency among sites as to the interventions provided and the level of special education staff support to provide them.
5. Train administrators in the use of effective RtI interventions.
6. Identify appropriate interventions for all sites to use.
7. Continue to maintain DIS caseloads with statewide guidelines.

Nonpublic Schools and Agencies (NPS/NPA)

Nonpublic Schools

A nonpublic school (NPS) is defined in the California Education Code as 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 56034). In addition, “... 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 56345 (a)).

FCMAT reviewed the percentage of students attending an NPS in each of the SELPA member districts. The June data includes all students enrolled in an NPS during the school year. Vista USD’s rate of 0.24% is slightly higher than the other unified districts in the SELPA. Elementary districts tend to have fewer NPS placements, while the high school districts tend to have more NPS placements than unified districts. Therefore, it is most accurate to compare Vista USD with the other SELPA unified districts.

Nonpublic School Placements by SELPA Member Districts

District	Nonpublic School Students 2010-11	District enrollment 2010-11	Percentage of students in a nonpublic school
Bonsall Elementary	1	1,967	0.05%
Cardiff Elementary	0	769	0.00%
Carlsbad Unified	20	11,063	0.18%
Del Mar Elementary	12	4,387	0.27%
Encinitas Elementary	1	5,475	0.02%
Fallbrook Elementary	0	5,816	0.00%
Fallbrook HSD	3	2,867	0.10%
Oceanside Unified	27	20,987	0.13%
Rancho Santa Fe Elementary	0	674	0.00%
San Dieguito HSD	64	12,485	0.51%
San Marcos Unified	41	19,117	0.21%
Solana Beach Elementary	2	2,879	0.07%
Vallecitos Elementary	0	661	0.00%
Vista USD	62	25,739	0.24%

Source: June 2010 California Special Education Management Information System (CASEMIS) data with each district’s 2010-11 enrollment data from Data Quest.

The NCCSE SELPA member districts use the same NPS contracts and negotiated rates. Unlike most county offices of education in California, the San Diego County Office of Education does not operate special day programs for disabled students. Therefore, this county has a higher NPS usage.

The district contracts with 14 nonpublic schools, four of which have a residential component. Fifty-three Vista USD students attend these schools, nine in residential placement and 44 in day programs.

Residential NPS programs are indicated by a star in the table below. In the past, the Department of Mental Health had been the determining agency for the residential placements and funded that portion of the placement. Changes in legislation (Assembly Bill 114, Chapter 43) now require school districts to assume responsibility for both the educational and residential costs. With changes in funding and in the agency that the district contracts with to provide therapeutic services, the number of students in residential placement may decrease. Providing the appropriate educational program and therapeutic support will be the key to bringing those students into a district program.

Vista Students in Nonpublic School Placements, April 2012

Nonpublic School	No. of Vista USD Students Attending	Grade Range and Types of Disabilities Served
Arch Academy	1	Grade 11 - Autism, emotional disturbance
Balboa	1	Grade 11 - Autism, intellectual disability
Banyan Tree	1	Grade 11 - intellectual disability
Institute for Effective Education	1	Transition - post high school
New Bridges	1	Grade 5 - Learning disability
New Haven **	15	Grades 7-12 - Behavior
Oak Grove **	3	Grades 4-11 - Behavior
Provo Canyon **	2	Grade 11 - Emotional disturbance
San Diego Center for Children Academy **	3	Grades 7-10 - Emotional disturbance
Sierra	4	Grades 7-12 - Emotional disturbance
Stein	3	Grades 7- post high school - intellectual disability
Summerhill	2	Grades 9-12 - Learning disabilities
Terri	13	Grades 4-post high school - Autism, behavior and intellectual disability
Winston	3	Grades 6-11 - Learning disabilities

According to a School Innovations and Advocacy report dated April 2009, 61 district students were placed in an NPS in 2007-08. The cost for those placements was \$2,085,060. The current cost for the 53 students in NPS placements is projected to be \$1,427,016, or a reduction of \$658,044. Neither amount includes the cost for the residential portion of the student's placement because this was not a factor in 2007-08.

Los Angeles USD has provided SELPAs with its list of nonpublic schools and the fees associated with those contracts. FCMAT compared that list with Vista USD's NPS contracts to determine

if Vista's rates were equitable. Only three sites were on both lists: New Haven, Oak Grove and Provo Canyon. The rate paid by the district for New Haven was the same as for LAUSD, was \$2 more per day for Oak Grove and was \$13 more per day for Provo Canyon. If the district becomes its own SELPA, this type of information will be helpful in negotiations.

District staff consistently expressed several concerns regarding the initial and continued placement of students in an NPS. No clear, written process exists to refer a student to an NPS. This may lead to students being referred to an NPS because of behavioral issues that have not been fully addressed in the district program. Staff reported that when students are placed in an NPS, goals and a transition plan to return the student to a district program are not included in every individualized education program (IEP). The lack of a clear plan for transition and the lack of district support available to address behavioral issues result in few students returning to district programs from nonpublic schools.

Students who move into the district with an NPS placement in their IEP are immediately placed into as similar a facility as possible. For example, students who are placed through probation or other agencies into the New Haven residential facility are usually also placed at the New Haven NPS. A written process is needed that requires consideration of district programs before an interim placement at an NPS.

Students who no longer benefit from the North Coastal Consortium of Special Education (NCCSE) day treatment program (NCCSE SELPA Handbook) have no district option to meet their IEP requirements and are therefore placed into an NPS.

Regional classes for emotionally disturbed students, referred to as Social Emotional Academic Support (SEAS) classes, have a capped number of students in each class based on grade. Students who would be eligible for these classes are placed in an NPS when the SEAS class is at its caseload limit.

The district does not have behavioral specialists to support students in general education or special education. The SEAS programs are structured for emotionally disturbed students, not behaviorally challenged students. Behavior plans and supports for emotionally disturbed students are not appropriate for behaviorally challenged students. Yet, staff reported that students with behavioral issues are often placed in the SEAS classes because no other district options exist for those students.

Some students, due to their very specific and low-incidence disabilities, may always require an NPS placement. However, providing district programs for most students in placements is cost efficient and would enable the district to more closely monitor the students' programs and provide services in the least restrictive environment (LRE). This could include additional counseling for some students, or classes that provide the level of structure needed for students with significant behavioral issues.

The midpoint of the SELPA salary schedule was used to estimate the cost for the district to develop a class for 10-12 students with significant behavioral issues.

One teacher	\$83,000
Three aides	\$120,000
1/2 psychologist/counseling	<u>\$43,000</u>
Total	\$246,000 or \$20,500 to \$24,600/student

The average cost of a Vista USD student in an NPS, based on the 2011-12 contracts, is \$27,000 per student plus the cost of transportation. Providing a district program for these students would save an estimated \$24,000 without including the transportation costs. Educational reasons for developing district programs in lieu of NPS programs include the benefit students receive by being educated in their district of residence and the district's ability to monitor the quality of the educational program. These benefits include access to district curriculum, taking part in all extracurricular activities, and increased opportunities for mainstreaming.

An even less costly way to serve some of the behaviorally challenged students who are now in nonpublic schools, district SDC programs and regional SEAS classes is to form a team of highly skilled behavior specialists and instructional assistants who could develop behavior plans, train teachers and aides to implement behavior plans, model for teachers and aides and provide immediate support in emergency situations. The team could help reduce NPS, district SDC and regional SEAS placements, and the number of suspensions and expulsions.

This type of district support could be developed in the areas that staff stated were the main reasons for the NPS placements: behavior associated with autism, learning disabilities or emotional disturbance. The district has the start of this type of support in its Autism Collaboration Teachers (ACT), which will be discussed later in this report.

The estimated cost for a behavior team using average district salaries is:

School psychologist or behavior specialists	\$86,000
Three trained instructional assistants	<u>\$120,000</u>
Total	\$206,000
Cost per student with 25 students per team	\$8,240/student

Recommendations

The district should:

1. Continue using the same contract as the other SELPA member districts, with the SELPA negotiating the contracts for NPS placements to ensure appropriate contract language and consistent rates. If the district becomes its own SELPA, participate with the other San Diego SELPAs in contract development and rate negotiation.
2. Carefully review each residential placement and determine whether either a current district/regional program or a new district program could meet the student's needs. If so, schedule an IEP to discuss returning the student from the residential NPS.
3. Use information provided by the Los Angeles USD to assist with negotiating contracts.
4. Develop clear procedures for determining when a student should be referred to an NPS program. If the primary reason for placement is behavioral, ensure that a functional analysis is completed and a full behavior intervention plan developed and implemented before the referral.

5. Ensure that goals and a transition plan to return the student to a district program are included in every nonpublic school IEP.
6. When a student enrolls with an IEP for an NPS, consider all district/regional options. Discuss with the special education director whether developing programs or services would enable the student to attend a district/regional program.
7. Determine what additional classes may be needed because current classes are at maximum capacity or because components of classes do not meet the needs of students now in an NPS.
8. Train or hire staff highly skilled in developing and implementing intensive behavioral plans for students with behavioral issues.
9. Continue placing students with unique needs in an NPS, with goals and transition plans in every IEP to return them to a district/regional program.

Nonpublic Agencies

The Education Code for nonpublic schools is now the same as for nonpublic agencies. A nonpublic agency (NPA) must “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 56345 (a)).

Vista USD contracts with 12 NPAs and 10 independent contractors to provide special education related services for students. According to the School Innovations and Advocacy report dated April 2009, the district was spending \$2,386,056 for NPA services. The projected budget for 2011-12 is \$1,968,035, which is \$418,201 less. However, it was not clear from the SI&A report if there were additional costs for independent consultants or if those costs were included in the NPA costs. When the current independent contractor costs are added to the NPA costs, the total amount is \$2,193,712, which is still a reduction of \$192,344.

The district provides these services through NPAs: autism, speech, physical therapy and nursing.

Vista Students Receiving NPA Services in April 2012

Nonpublic Agency	No. of Vista students receiving services	Grade range and type of service provided
ACES	1	Grade 6 - Autism
Autism Experts Empowering Families and Children Together	2	Grades 5-6 - Autism
Autism Spectrum Consultants	2	Grades K-7 - Autism
Banyan Tree	1	Grade 12 - Behavior
EBS	All grade levels	Multiple - Speech
Dependable Nursing	5	Grades 1-12 - Nursing
Functional Therapy	7	Grades preschool - 5 - Physical Therapy

Nonpublic Agency	No. of Vista students receiving services	Grade range and type of service provided
Interim Health Care	1	Nursing
Maxim	5	Nursing
Pathways 2 Speech	All grade levels	Multiple - Speech
Progressus	All grade levels	Multiple - Speech
Summit	All grade levels	Multiple - Speech

The district also contracts for autism, nursing, occupational therapy and speech services. When a district provides these services through an independent contractor, it is usually because the district could not find an NPA to contract with or because of a specific resolution with a family. Services such as transition, escort, interpretation, music therapy and vision therapy are typically provided under independent contract.

Independent Contractors

Independent Contractor	Grade range and type of service provided
BHR Speech	Multiple - Speech
Coast Music Therapy	Multiple - Evaluations/IEPs
Daniel and Daniel Optometry	Multiple - Vision Therapy
Employment and Community Options	18-22 Transition services
Hebner Systems	Occupational Therapy
Karen Lonsway	Multiple - Speech
Network Interpreter	Multiple - Interpreter
Palomar Pomerado Health	Multiple - Nursing
The Autism Group	Multiple - Autism
West Shield Adolescent Services	Escort

The number of Vista USD students receiving services was not identified on these contracts.

For 2011-12 the district has estimated the cost of the independent contracts at \$225,677. This amount includes \$160,000 that could be provided by an NPA. Contracting with an independent contractor may or may not be cost effective for the district.

A significant portion of the NPA and independent contracting costs are for students with autism. The estimated NPA costs based on the projected budget for 2011-12 is \$229,013, plus contracted services of \$13,000, for a total of \$242,013. Alternatives to these costs are discussed in the section of this report regarding district programs.

The district expends \$419,106 in NPA nursing services and \$75,000 in contract nursing services. In some cases, due to the medically fragile nature of a specific student or the agreement through the IEP with a student's family, hiring a nurse through an NPA or independent contract may be necessary. Hiring nursing staff can be very challenging. A close review is warranted to determine whether it would be both programmatically effective and cost efficient to hire more nurses to provide these specific services.

Speech is another high-cost area for the district with regard to NPA and independent contracts. Districts around the state contract with NPAs for speech therapists, who can be difficult to hire because they are in high demand. Vista USD has 17.85 FTE who are contracted speech therapists out of a total 39.45 FTE for a projected cost of \$2,386,056. This is \$677,509 less than the 2009-10 fiscal year. Based on the total cost of the NPA and independent contracts, the average cost of a contracted speech therapist is \$80,649, which is approximately \$6,000 less than the average cost of a district-employed speech therapist.

This is certainly a cost savings, but has significant drawbacks. District employees tend to stay with the district, while contract employees often change yearly. Contract employees tend not to invest in working relationships with district staff; district staff must provide training yearly on how the district provides services; the district does not evaluate the contracted employees, and therefore the quality of therapy may not be at the level of district employees. These factors should be considered in deciding whether to hire more speech therapists as district employees or to continue contracting.

Occupational therapists also are an area of high cost, both through the NCCSE Regional costs and an additional MOU with NCCSE. The district also has a \$75,000 contract with an occupational therapist. As with speech therapists, it can be difficult to hire an occupational therapist. The district does not have certified occupational therapy assistants (COTAs). Districts often hire COTAs to provide some occupational therapy to students, allowing the occupational therapist to provide evaluations, develop treatment plans and attend IEP meetings. Employing COTAs also enables the occupational therapist to carry a larger caseload since they do not deliver all of the daily therapy.

The NCCSE charges for services should be considered in the cost of NPA and independent contractor services. These include two occupational therapists at \$209,644, one speech and language pathology assistant at \$54,011, and six sign language interpreters at \$255,450. The NCCSE also charges \$649,743 for assistive technology support, program specialist and occupational therapist services that are first paid from the NCCSE budget and then charged to the district based on the district's ADA.

Recommendations

The district should:

1. Determine if it is cost efficient to contract with an NPA rather than an independent contractor for each service that an NPA could provide.
2. Review all IEPs that include nursing services to determine if the district could provide those services through newly hired or current district employees at a cost savings.
3. Contract for speech therapists when necessary, and continue to recruit district speech therapists to provide more stability in services.
4. Review all IEPs requiring occupational therapy to determine if these services are still required. Then determine the number of occupational therapists needed to provide the services and whether hiring district staff and COTAs would be more cost efficient than the SELPA contract.

Single-District SELPA

The SELPA has begun to review its funding allocation model to achieve greater funding equity among its members. This is fairly common among California's SELPAs. When the transition was made from the prior J-50 funding model to the AB 602 funding model, most SELPAs, including NCCSE, established allocations that ensured minimal fiscal harm to any member.

Despite significant demographic changes over the last decade, little was done to determine whether or not the funding allocation was equitable. As many SELPAs have discovered, "equal" and "equitable" are not synonymous.

Among the ten guiding principles for the creation of funding models for special education services contained in the Master Plan for Special Education are:

- Provide adequate resources to assure equality of educational opportunity for all individuals with exceptional needs.
- Provide levels of support for special education programs which will promote programs and services of equal quality.
- Ensure equity in support levels among various program components.

(California Master Plan for Special Education, California State Board of Education, Jan. 10, 1974, Pages 36-37).

Because SELPAs are responsible for disabled students residing within their boundaries, the funding model should ensure that all these students receive the same level of service. For example, if a student were to move from Carlsbad or Vista to Vallecitos, the funding model should ensure that Vallecitos is financially able to provide the same services the child previously received.

This concept is also found in guiding principles adopted by a number of SELPAs for use in developing equitable funding models, which include:

- The allocation plan is the means by which the SELPA distributes funds it receives from county property taxes, state, and federal sources to the local educational agencies to assist in paying the excess costs of providing special education services.
- These are communal monies, not the property of the recipient. Each member has a legitimate stake in the equitability of the allocations and in how other members use the resources.
- No member should accrue undue benefit at the expense of other members. Thus, the allocation model must be fair, equitable, and transparent to all members.

A preliminary review of the allocation model of the NCCSE (SELPA) indicates that Vista USD would receive net funding from the SELPA in 2012-13 of \$15,299,617, or \$628 per ADA. This would be \$3,633,427 less than it receives under the current model.

If Vista USD became a single-district SELPA, it would receive the same base rate of \$639.10 and supplement of 72.8 cents that NCCSE receives. Based on enrollment of 24,307, it would receive \$15,592,608. It would also receive the same property taxes as it does now, but that amount would be subtracted from the base funding of \$15.5 million. That's neither a gain nor a loss, because property taxes are a part of the calculated base funding.

Based on information from CDE, the single-district SELPA would receive an additional \$4,532,063 in IDEA funding. The SELPA distributes IDEA funds based on the unduplicated

pupil count, while the state must follow the federal formula. This formula provides the same amount the district would have received in the base year (1999) of \$1,523,730 and prorates any additional funds on an 85% basis based on the relative California Basic Educational Data System enrollment compared to the rest of the state (\$2,570,250), and a 15% basis based on its relative rate of poverty compared to the rest of the state (\$430,083).

If growth occurs between this year and next, it will be based on a comparison of Vista USD's current-year ADA with that of the previous year, and the increase would be computed using the state target rate (\$465.44), a much lower figure than its base rate (\$639.1728).

If enrollment decline continues, it would be calculated using the greater of the prior year or the second prior year and computed using the base funding rate of \$639.1728.

Charter schools can have a very serious effect on the SELPA's funding. Any additional ADA reported by the charter to contribute to growth will be at a lower target rate, and if the school closes, relocates, or joins another SELPA, the ADA loss will be computed at the much higher base rate per ADA rate.

Regionalized services and program specialist funding generates \$15.10 per ADA. Education Code Section 56836.23 requires this funding to be used to provide services such as program specialists, management information systems, curricular coordination, staff development and other activities to support the SELPA statewide.

Many SELPAs, such as the NCCSE, have added services such as low-incidence programs, highly specialized related services and out-of-school placements. This will require additional funding from the district because in the current allocation model, the SELPA funds its own expenses before distributing resources to the districts (sometimes known as off-the-top funding). The district should determine how it would address these issues and services. It may be possible to provide low-incidence programs for the hearing or visually impaired more cost effectively. For example, if low-incidence services are available in Escondido, the district could enter into a contractual agreement with the North Inland SELPA.

Other small federal and state grants would accrue directly to Vista that are now allocated or used by the SELPA.

While there are advantages to becoming a single-district SELPA, Vista USD's declining enrollment tends to erode many of those advantages.

It is far too late in the year to take the steps to become a single-district SELPA beginning July 1, 2012. The required timeline for notification is one year plus one day. While it might be possible to obtain unanimous agreement from the NCCSE governing board, it is too late to notify CDE so that the fiscal office can change the CASEMIS software.

Secondly, some members of the State Board of Education reportedly are concerned that prior state boards gave insufficient consideration to the size and scope requirements (see Appendix B to this report). If that is the case Vista USD's declining enrollment is likely to make it an unlikely candidate to be an exception to those criteria because it is already below the size standard.

In 2012-13, the NCCSE will implement a new student data system for special education. This is a costly and time-consuming process, and it will be to Vista USD's advantage to have a system in place before becoming a single-district SELPA.

Recommendations

The district should:

1. Weigh the advantages and disadvantages of becoming a single-district SELPA over the next year.
2. Participate in the new data system installation and work with the SELPA to continue to make the allocation model more equitable.
3. Make the necessary programmatic changes to improve its fiscal situation with regard to special education.

Infrastructure

Management Structure

FCMAT found several issues in the special education department structure with regard to IEP meetings, program specialist roles, and the special education reporting structure. Procedural direction from administration to staff is inconsistent, which has resulted in a lack of confidence and credibility.

Every IEP meeting must have an administrative designee who represents the district (Education Code Section 56341). The district has complied with the requirements of this section; however, (4) (C) of that same section requires that the district representative “is knowledgeable about the availability of resources.”

The program specialists frequently serve as administrative designees at IEP meetings, but any decisions regarding the expenditure of district funds rest with the director of special education, who cannot attend all IEP meetings. As a result, the IEP team suspends the meeting to get authorization to use district resources and then reconvenes to finalize the IEP. This can lead to serious compliance issues.

As a member of the NCCSE, the district is required to adhere to established practice regarding program specialist services. Three program specialists who work full time for the district are employed by the San Diego County Office of Education. This creates issues for the district because they are not district employees, have little knowledge of the availability of district resources and have no authority to allocate them. The SELPA is changing this practice, and by 2013-14 the program specialists will be assigned to the districts and will not be hired by the San Diego COE. A single-district SELPA could choose to hire its own program specialists.

Staff do not clearly understand the job responsibilities of the director of special education, particularly regarding budget oversight and management. Special education interacts with every major district division, and effective communication is essential.

Some staff, such as the Business Services employees, are unfamiliar with the laws/regulations the Special Education Department must follow to provide services, which makes budgeting more difficult and complicates the accounts payable process. Special education staff lack understanding of what Business Services needs from them to be able to track and document expenditures and budget accurately.

No process exists for providing critical staffing information to Business Services to build a projected budget each year. This affects Business Services' ability to budget accurately. For example, in November 2011 the board had to take action on expenditures of \$288,000 for additional instructional aide positions for special education. The written rationale for this request clearly showed that these issues all should have been communicated in budget development for the 2011-12 fiscal year.

Communications between the Special Education Department and other key departments should include at least the following elements:

Business Services

1. Quarter 1: Review the working budget for the current school year; confirm nonpublic school contracts with Sept. enrollment; close contracts for students who no longer reside in the district; confirm total FTE of

all special education staff. Develop an agenda for other issues from both departments.

2. Quarter 2: Begin to discuss information needed for the 2013-14 projected budget; set timelines and due dates; define the process for requesting new resources; share plans for reductions or program changes.
3. Quarter 3: Direct supervisor of special education and the finance department finalize projected budget.
4. Quarter 4: Review expenditures for the current year; review nonpublic school placements and confirm for the fall.

Learning Support Services

1. Quarter 1: Review available statewide assessment data. Set department goals for access to core curriculum; develop training schedules.
2. Quarter 2: Review CASEMIS report from June 30; examine exit rates and identification rates; review status of curriculum implementation.
3. Quarter 3: Discuss plans for statewide testing for disabled students; resolve any issues regarding test administration.
4. Quarter 4: Review progress on yearly goals; determine next steps, identify problem areas.

Human Resources

1. Quarter 1: Align caseload lists with payroll, human resources and finance.
2. Quarter 2: Review alignment of NCLB compliance requirements for special education; identify any potential staff layoffs.
3. Quarter 3: Finalize staffing plan for 2013-14; report progress on staff evaluation; resolve staffing discrepancies between payroll, business and special education; select positions to close, if any.
4. Quarter 4: Review staffing plan for 2013-14; discuss extended school year staffing and plans for next year.

Transportation

1. Quarter 1: Align transportation lists; troubleshoot problem areas.
2. Quarter 2: Discuss training schedules and options for staff development between special education and transportation.
3. Quarter 3: Budget projections for the 2013-14 school year; discuss extended school year plans.
4. Quarter 4: Review transportation needs for fall 2013; provide special education class lists by name and location to transportation.

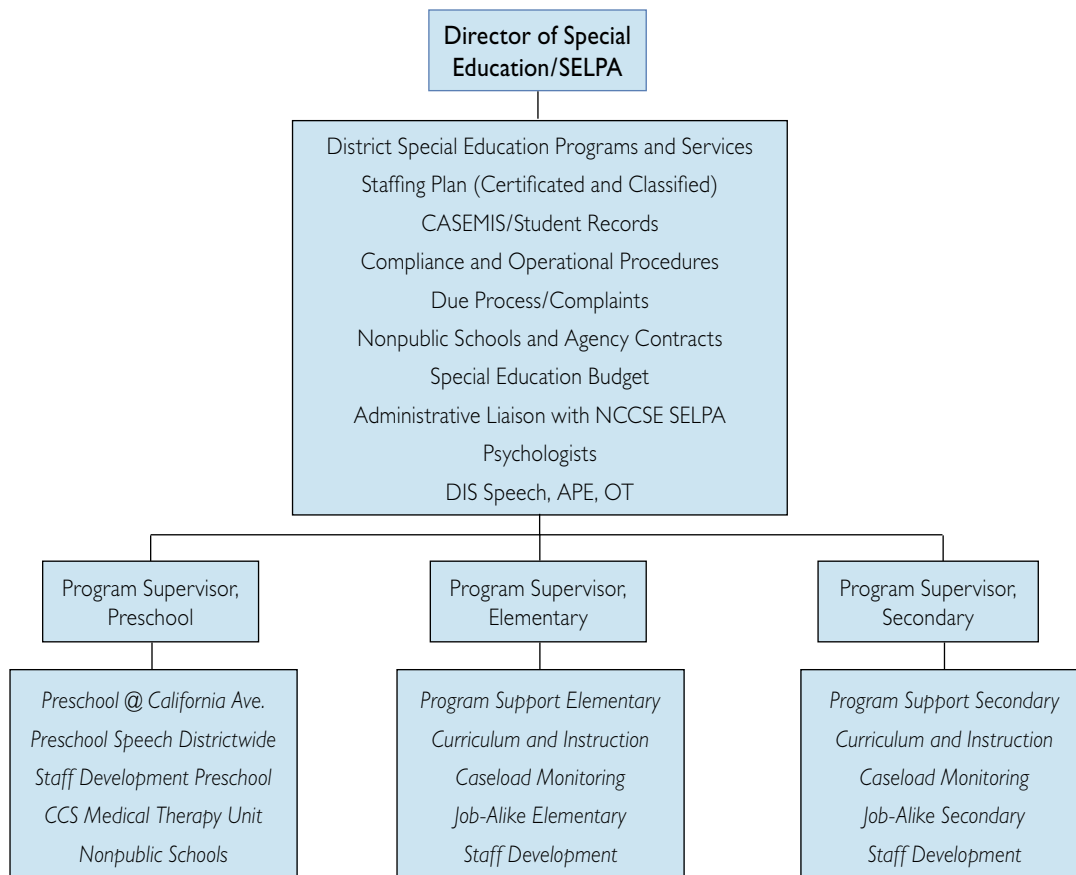
Special education operating procedures are not written or defined, resulting in inconsistent direction to staff. Both district and site staff indicated that the accuracy and consistency of procedural guidance depends on who gives it. Therefore, the site staff avoid contacting the central office staff because they have little confidence in their ability to provide consistent direction. Instead, each school site relies on its own procedural interpretation and implementation, which can lead to compliance issues.

The current management and reporting structure does not provide consistent communication to itinerant staff such as psychologists, speech therapists, adapted PE teachers and occupational therapists. Psychologists and adapted PE specialists are supervised by the administrator of California Avenue School, a preschool for disabled students. An administrator from Sierra Vista supervises the speech therapists. A program specialist employed by NCCSE supervises the occupational therapists. Greater efficiency can be achieved with leadership and support from the director, who should have primary responsibility to oversee all itinerant groups.

Direct supervision and support from the director of special education to psychologists and speech therapists would provide better communications with front-line staff and improve procedural consistency.

A department structure that delineates elementary from secondary would align with Education Services. Using the resources from an open program specialist position would allow the department to have a director and three program supervisors: preschool, elementary and secondary.

Proposed Organizational and Responsibility Chart for Special Education



Recommendations

The district should:

1. Ensure that the director of special education understands the administrative reporting structure and all areas of responsibility including the budget.
2. Determine who will serve as an administrative designee to fulfill all the IEP requirements outlined in statute and authorize the provision of necessary district resources. Provide training and support.
3. Continue to discuss options with NCCSE to return regionalized service funds for program specialists as early as 2012-13.
4. Establish clear reporting structures to which special education staff should be held accountable.
5. Establish communication protocol between special education and the director or assistant superintendent of Business Services, Education Services, Human Resources and Transportation.
6. Finalize written procedures to ensure special education complies with all applicable laws and regulations.
7. Ensure that procedural changes are clearly communicated and that staff on the front line are supported in implementing the procedures.
8. Reinforce procedural consistency through regular job-alike meetings with teachers, psychologists, and DIS staff (speech therapists, occupational therapists and adapted physical education).
9. Structure the Special Education Department to delineate elementary from secondary education and align with Educational Services.

Programming

Three types of programs or services were reviewed to determine if the district would need to provide additional classes or programs as its own SELPA. They were: 1) Out of district students attending regional classes operated by Vista; 2) Vista students attending regional classes operated by other districts; and 3) Classes or services operated by NCCSE.

Starting in 2012-13, NCCSE will implement a new allocation model that affects the amount the district will receive and the cost of operating regional classes. The district of operation will be totally responsible for the classes, which will be staffed at a predetermined level. That district will be able to charge at a predetermined level for out-of-district students who attend these classes, and the students will still need to be referred through a process agreed to by the member districts.

The regional classes are separated into three different types:

Type 1 classes are moderate/severe, transition and preschool. These classes must be capped at eight students for preschool, 10 for K-6, 12 for 7-12 and 12 for transition. Staffing is one teacher and three six-hour aides, with a set amount included for occupational therapy, speech and adapted physical education. One-to-one aides, nursing services, and physical therapy are not

included in the base rate and will be billed for out-of-district students at a cost determined by the SELPA and the district.

Type II classes are for emotionally disturbed students (SEAS). These classes are capped at 10 for K-6 and 12 for 7-12. Staffing is one teacher and two six-hour aides. Services for students who require occupational therapy, speech or adapted physical education will be billed at predetermined rates set by the SELPA and the district. In addition, costs for one-to-one aides, nursing services and physical therapy will be billed for these students.

Type III classes are general special day classes that are capped at 12 for K-12. Staffing is one teacher and one six-hour aide, and any related service incurs additional cost.

The district will operate 23 regional classes plus the preschool classes at California Avenue School under this new model. Two of the current regional classes, the medically fragile and behavior classes at California Avenue, will continue to be operated by NCCSE.

If the district becomes a single-district SELPA, it will need to be determined whether the district will continue to operate these classes as open to the region and if so, whether the capped number of students in the class and the staffing ratios will be retained. If there are no out-of-district students, the district will need to determine whether there are enough district students in the class to warrant operating it. The table below lists each of the Type I and Type II classes that will be operated by Vista USD next year.

A discrepancy was found between two SELPA-generated lists. The first listed all students enrolled in regional classes in February 2012 and the second listed the number of students who were in or out of district in regional classes as of April 2012. The first list included four preschoolers, 18 SEAS students and 40 moderate/severe students for a total of 62 students, while the second list included four preschoolers, 19 moderate/severe students and 18 SEAS for a total of 41 students. The lesser number of students was used for the table below so as not to overestimate projected income. However, accurate numbers of students will be needed.

Classes with asterisks may be appropriate to (1) combine, (2) continue to operate with additional district students who are now in an NPS or receiving NPA services, (3) operate as another type of class or (4) close.

Vista-operated regional classes per data provided by the SELPA - April 18, 2012

Class Description and Grade Level	Current Location	District Students	Out-of-District Students
Autism K-I	California Ave.	7	1
Moderate/severe 3-5	Temple Heights	10	1
Moderate/severe K-I	Temple Heights	11	0
Moderate/severe 3-5	Mission Meadows	9	0
Moderate/severe 6-8	Madison Middle	12	1
Moderate/severe 6-8	Roosevelt Middle	9	1
Moderate/severe 6-8	Washington Middle	8	0
Moderate/severe 9-12	Rancho Buena Vista High	10	0
Moderate/severe 9-12	Vista High	9	0

Class Description and Grade Level	Current Location	District Students	Out-of-District Students
Moderate/severe - behavior 6-12	Sierra Vista **	4	3
Moderate/severe - medical 6-transition	Sierra Vista **	11	3
Moderate/severe - transition 18-22	Sierra Vista **	8	3
Moderate/severe - transition 18-22	Sierra Vista **	9	3
Moderate/severe - transition 18-22	Sierra Vista **	10	3
SEAS 3-3	Grapevine **	7	3
SEAS 3-5	Grapevine	10	0
SEAS 6-8	Washington Middle **	9	2
SEAS 6-8	Sierra Vista **	3	3
SEAS 9-12	Sierra Vista **	7	5
SEAS 9-12	Sierra Vista **	3	2
SEAS 9-12	Sierra Vista	11	1
SEAS 9-12	Rancho Buena Vista High	5	1
SEAS 9-12	Vista High	10	1
Autism	Preschool	93 (3.5 regional, 4.5 local)	4

Changes in the funding stream will prompt all NCCSE member districts to carefully consider whether to continue sending students to classes outside their district. For the first year of the new agreement, the district operating a regional class will be able to bill the sending district for 34% of the predetermined cost/student, increasing to 67% the second year and 100% the third year.

Staffing costs (including salary and benefits) that the SELPA has agreed to reimburse are:

Teacher (1.0 FTE)	\$84,169.42
Aides (0.75 FTE)	\$36,462.17
Speech therapist (1.0 FTE)	\$90,439.84
Occupational therapist (1.0 FTE)	\$84,440.11

Costs were calculated to estimate the average cost per student in a regional class. Since programs vary by cost, sending students to a Type II class and receiving students into a Type II class may not result in equal related services charges.

The average cost for out-of-district students in a Type I class does not include the time of the speech therapist and occupational therapist. The basic rate only was used for this study because the percentages of staff assigned to each class could vary.

Preschool	\$24,194.49
K-6	\$19,355.59
6-12 and transition	\$16,129.66

The average cost for out-of-district students in a Type II class would be:

K-6 \$15,709.38

7-12 \$13,091.15

FCMAT did not find any out-of-district students in a Type III class.

Assuming no changes in the number of students per class, the funding model or the average costs, the estimated income for the out-of-district students in the regional classes would be \$165,826 for year one, \$437,361 for year two and \$603,188 for year three. This is a small offset from the significant decrease in funding under the new SELPA allocation model. However, if the district were its own SELPA, it would determine the charges per student and the staffing ratio. The district could decide to charge out-of-district students using the NCCSE model or an actual fee for service. Staffing could utilize the NCCSE ratio or could decrease or increase based on the students' needs in each class.

FCMAT also reviewed the 16 Vista students who attend a regional program in another district that will continue to be operated by that district. This number was consistent between the February and April lists. These placements were made either because the Vista USD program was at capacity or there was a specific IEP agreement. In the past, cost was not considered when placing a student in a regional class outside the district. However, as stated above, this is no longer the case.

Vista students in out-of-district programs

Class Description and Grade Level	Current Location	No. of Vista Students
Moderate/severe 7-12	San Marcos	2
Moderate/severe transition	San Marcos	1
Moderate/severe transition	Oceanside	1
Autism K	San Marcos	1
SEAS 7-12	Carlsbad	1
SEAS K-6, and 7-12	Oceanside	8
SEAS K-6	Encinitas	1
SEAS 7-12	Bonsall Union	1

The per-pupil cost for these students was calculated in the same way as the out of district students in a Vista program. A rough estimate of the cost for these students is \$85,778 in year one, \$174,155 in year two and \$259,933 in year three. These costs reduce the level of income generated by the out of district students into Vista programs.

The last area reviewed was the programs and related services that NCCSE will continue to operate under the new model: the day treatment program and two classes housed at California Avenue, the medically fragile class and the autism/behavior class. District staff indicated that these classes provide important services, but they do not currently have enough district students to warrant an independent class. In other districts NCCSE will continue to operate the deaf/hard of hearing classes. It also provides itinerant vision services, deaf/hard of hearing itinerant services, occupational therapy and assistive technology. NCCSE will bill districts 100% of the cost for students in those classes beginning in year one of the new model. It would be difficult for the

district to provide its own deaf/hard of hearing program because of a shortage of appropriately credentialed teachers and the level of interpreter services required in such a program.

With operating funds from the member districts, NCCSE provides staff development, management information through the computerized IEP, CASEMIS reporting, monitoring of the required local plan and all other state reporting. With this funding it will also provide program specialists, occupational therapy, and assistive technology.

If the district becomes its own SELPA, it will be required to develop its own local plan and report directly to the state for the yearly budget plan, staffing plans, and CASEMIS, along with any other state reporting requirements.

NCCSE and the district will need to determine who will operate the NCCSE classes housed in the district. If NCCSE continues to operate them, they may stay in the district or be moved to an NCCSE member district. Vista may or may not continue to have access to those programs. The district and NCCSE will also have to determine whether the itinerant services will be provided through a contract or MOU, or by the district itself.

Specific classes/programs operated by NCCSE that will need to be either replicated by Vista or contracted with NCCSE to provide if Vista USD is its own SELPA are listed below. Program specialists, who are NCCSE staff, are not included in this list because of the agreement already in place to transfer those funds and hiring responsibilities to the district for the 2013-14 school year.

- Deaf/hard of hearing classes
- Deaf/hard of hearing itinerant services
- Vision itinerant services
- Assistive technology assessments and support
- Medically fragile NCCSE class
- Autism/behavior NCCSE class
- Day treatment
- Occupational therapist
- Speech and language assistants

Recommendations

If the district becomes a single district SELPA, it should:

1. Ensure that enrollment data is accurate for out of district students in 2012-13 regional classes to ensure appropriate invoicing for them.
2. Review each of the 2012-13 regional classes by enrollment numbers and student needs to determine which classes may be open to out-of-SELPA students, what the cap and staffing of those classes would be and to determine whether to continue classes as currently structured or restructure them to better meet district needs.

3. Review the funding model for each regional class to determine the percentage of time assigned for speech and occupational therapy, and include that in the total cost of invoicing Type I classes while remaining in the SELPA and if the district becomes its own SELPA.
4. Review the funding model for each regional class the district would continue to operate as a SELPA. Determine whether the district will use the average costs or actual costs for each class and if it will continue to use the current billing percentages or will bill at 100% of actual costs including indirect and all related services.
5. Review each Vista USD student attending a class outside the district, other than the deaf/hard of hearing program, and determine if a district program could fulfill the IEP. If so, convene an IEP to return the student to the district for the 2012-13 school year. Continually monitor these students and return them to district programs as appropriate.
6. Determine whether to continue contracting with the SELPA for deaf/hard of hearing classes, itinerant vision and hearing, occupational therapy and assistive technology, or hire staff for these services. Develop a plan with NCCSE to determine which entity will operate the two NCCSE regional classes at California Avenue School and which districts will have access to those classes.
7. Continue working with NCCSE to ensure the district can hire its own program specialists or supervisors for 2013-14.

Program Efficiency

Identification

The statewide special education identification rate is 10%, and Vista USD identifies students for K-12 at 11.79%. The staff reports that special education is used as the only intervention for students at risk in the absence of an effective Response to Intervention (RtI) model.

Exit Rates

The annual exit report for special education submitted to CASEMIS indicates that the district exited 174 students from special education during the 2010-11 school year. In addition, 155 graduated with a diploma; 14 received a certificate of completion; 82 graduated with a diploma using an exemption; and 25 graduated with a diploma using a waiver. No data was available from the SELPA on the exit rates from its other member districts. The district is encouraged to compare its exit rate with other K-12 districts with regard to the numbers of students returning to general education, graduating with a diploma, and graduating with a certificate of completion. There is a perception in the district among teaching and administrative staff that students do not exit special education, but it cannot be verified unless the district begins to track its exit rate through CASEMIS and compares itself to other districts.

Statewide Assessment

The district API for 2011 increased over 2010 by six points: from 786 to 792. The students with disabilities decreased, from 648 to 641. Two years ago the Special Education Department was told to test with the California Modified Assessment for any students having trouble meeting academic proficiency standards and exceeded 3% of the allowable cap; the next year the test was given correctly and the scores dropped. All subgroups except special education made significant gains in API. The special education subgroup has not reached proficiency in either English-language arts or math.

Program Delivery

FCMAT visited several schools that housed resource, special day mild/moderate and moderate/severe programs to review the special education delivery system and seek efficiencies.

The district uses the model of resource specialist and SDC mild/moderate classes. In some cases, the resource specialist provides a form of learning center where non-identified students receive some instruction, but often the SDC students do not have this access. At the elementary level the SDC students are clustered at three elementary schools and require transportation.

A concern expressed by staff was that the students in the SDC classes do not receive the most effective instruction because one teacher is required to provide instruction to a range of abilities and grade levels. It was also a concern that although the SDC teachers have access to core materials, they are not always used for primary instruction. When students have been in an SDC class for several years, the likelihood of their ability to move into a less restrictive environment decreases significantly.

Staff expressed concern regarding the current SDC model for mild/moderate students because it is difficult to mainstream those students at all grade levels. When general education classes are at their maximum class size, teachers are naturally reluctant to accept mainstreamed students, both mild/moderate and moderate/severe. This means that many students cannot access the general education classes that could be of benefit. In addition, when resource specialists have a maximum

caseload and are taking general education students into their programs, they are naturally reluctant to take SDC students into their classes even when the student could benefit from the instruction. Also, when SDC classes are clustered at the elementary level, opportunities for mainstreaming are further reduced because of the high numbers of SDC students at the site.

Staff stated that the lack of a strong district team to provide behavior plans, modeling and immediate support for intensive behavior issues to special or general education students is a primary cause of student referrals to special education. Once a student is in special education, behavior is often the reason for referral to an SDC, a class for emotionally disturbed students, or to an NPS. Requests for additional classroom aides or one-to-one aides also result from these special education placements.

Ample research supports student placement in general education for instruction whenever possible. This does not mean that all special education students should be fully included, but that access to general education and a range of special education instruction should be available to all students as appropriate. Limited mainstreaming opportunities deny this access.

The district has begun discussing an alternate model for special education that includes learning centers and collaboration. However, what this model would include is unclear. The special education staff is concerned about changing the RS/SDC labels and general education teachers are concerned about having SDC students in their classes full time. Also needing clarification are teachers' caseloads, how to use RtI as a primary condition of determining special education eligibility, who will staff learning centers, and the role of special education teachers and aides in the general education classroom. A task force is scheduled to begin meeting this summer to discuss these issues.

Learning center models work successfully, along with a strong RtI model, in many districts throughout the country. Extensive training and planning are necessary to implement any new special education delivery model.

In other districts that operate learning centers, the titles of resource specialist and special day class teacher are eliminated and replaced with another title such as specialized academic instructor. The Code of Federal Regulations Title 34, Part 300.18, defines specialized academic instruction as follows:

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

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

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

Moderate/severe special education students would continue to be served in an SDC class at specific sites.

Specific classes structured to address the unique needs of behaviorally challenged students along with support staff trained to develop behavior intervention plans and assist staff in implementing these plans would reduce the number of students in SDC behavioral classes, reduce the number of NPS placements, and ensure that classes for the emotionally disturbed are not populated with behaviorally disordered students.

FCMAT also identified an elementary program for autistic students as both a cost savings and as necessary for a full continuum of options. The autism collaboration teaching (ACT) staff attempts to work with as many of the autistic students as they can except for those at California Avenue School. This has resulted in large caseloads and little time for developing and monitoring individual behavior plans, providing training in data collection and implementing the plans. Four staff members with a variety of backgrounds are employed in this role.

The development of two elementary autism classes and possibly an additional middle school class would enable the students most in need of autism behavioral services to receive them more effectively and cost efficiently. In addition, shifting from four credentialed staff to two highly skilled staff in autism with four to six highly trained instructional assistants for autistic students who are not in an autism SDC program would also be cost effective. This would reduce the number of one-to-one aides and more restrictive placements.

Both these additions to the current programs for autistic students could significantly reduce the \$242,013 spent on NPA and independent contractor services and the cost of sending Vista USD students to nonpublic schools or regional programs in other districts.

At the high school, the focus of instruction in the general education program is graduation with a diploma by meeting the district's requirements and passing the California High School Exit Exam. Staff reported that a significant number of special education students are receiving credit for subjects that they have not legitimately earned so they may be granted a diploma. No data was available regarding the actual number. The goal of staff is to keep the students in school so they may graduate with a diploma. This is certainly a reasonable goal. However, if this information is accurate, then students who are not capable of passing a class, even with appropriate modifications, are given credits and a diploma because no other alternatives are available.

A program designed for students who are not on a diploma track is now available only to moderate/severe students. This leaves a significant group of students, according to staff, without the skills needed to prepare them for employment and with a diploma that does not reflect their abilities. Students who are appropriately enrolled in an alternative program gain life skills and graduate with a certificate of completion. They enter the program in the junior and senior years, enabling them to complete their credit requirements for graduation. Developing this type of program is a high priority for the high schools, but it is time intensive and would require board action. Other districts in the state operate alternative programs and NCCSE, through the SELPA organization, should be able to connect Vista USD with these districts.

Staff reported that special education students cannot access the magnet schools or the alternative education schools when they need more than 50% of their day in specialized instruction. Changing the delivery system from resource and special day to a more generic instructional delivery system would enable students to access these programs.

All of these program recommendations are costly. However, these costs can be largely offset by redistributing staff based on the needs of each school, identifying fewer students for special

education, significantly reducing transportation costs, reducing placements in nonpublic schools, providing IEP services through the district rather than contracted personnel, and increasing student scores through more effective delivery of instruction.

California Avenue and Sierra Vista Sites

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

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

Although Education Code Section 56041.1 (b) permits the removal of individuals with exceptional needs from the regular education environment, this may occur "only if the nature or severity of the disability is such that education in the regular classes with the use of supplementary aides and services cannot be achieved satisfactorily."

FCMAT made on-site visits at both California Avenue and Sierra Vista and also interviewed staff.

California Avenue School

California Avenue School offers a comprehensive range of preschool services including autism programs and services, typical integrated preschool programs, and designated instruction services such as speech, adapted physical education and occupational therapy. It operates 15 special day classes for students with qualifying disabilities. Twelve classes for preschool age children and three classes for children ages 6-11 are offered, with a total enrollment of more than 300 students. All of these classes are open to 14 school districts throughout the NCCSE. The operating budget is \$3,067,431.

While technically this is a segregated site, it has many opportunities for integration with age appropriate peers and mainstreaming. This program was developed as an alternative method of providing programs and services for autistic students. As a result, the district has been able to provide appropriate levels of service for these students without the excessive costs of NPS agencies charging more than \$140,000 per student for home services. All services are delivered at the school by qualified staff at a significant savings.

Some costs also are recouped from the MOU with other districts in the SELPA who access this program at a rate of 100% of the cost. There is a tuition fee for the integrated preschool that is also used to offset programming costs.

The special education classes at the California Avenue School, while costly in terms of budget, meet the standards of appropriate service for students with autism and intensive physical needs. These are high cost students and by regionalizing this program, NCCSE provides services for member districts at a reasonable cost. It offers opportunities for mainstreaming and integration and, therefore, meets the intent of the statute for integration with nondisabled peers.

Sierra Vista School

Sierra Vista School is a small segregated school site dedicated to serving students ages 14-22 with severe handicaps. There are four classes for students with emotional disturbance (one for middle school and three for high school students); two classes for severely disabled high school students,

and five transition programs for severely handicapped students ages 18-22. The number of students served is 118 and the budget is \$2,560,616.

The staff expressed concern about the appropriateness of the referral and placement procedures. They do not feel that all of the placements are appropriate, yet they do not have input into the placement decisions that are made by the sending schools.

Sierra Vista School is a segregated site. Students on this campus have no opportunities to integrate with age appropriate peers or mainstream on high school campuses. Students in the emotionally disturbed classes have been on comprehensive high school campuses and require a more restrictive setting; however, they should always have access to the least restrictive environment at an appropriate level.

Students in transition programs do not need to be on a segregated site. The programs are community based and in some instances access college-level programs and services.

When the district begins strategic planning for special education this summer, the planning team should discuss the appropriateness of these students remaining on an isolated site with no access to age appropriate peers. There are certainly issues related to the legal requirements of state and federal law for disabled students, but there should also be discussion about the value of students being removed from their schools of residence. Finally, there are fiscal concerns over the efficiency of serving students on a separate site. This requires a separate facility, maintenance, front office staffing, and administrative supervision, which adds to the costs. At a cost of \$21,700 per student, the district will need to determine whether this type of service delivery is cost effective.

Procedural Efficiency

The district has adopted the NCCSE forms for determining the need for a one-to-one aide or special circumstances instructional assistant (SCIA). These are considered by staff to be thorough but also cumbersome, so they are not always completed before the IEP team makes the determination for the aide. In addition, the forms are rarely used, usually when the student first has the SCIA on their IEP. All future IEPs may discuss the continued use of the aide, but no forms are required. The IEPs that do include a SCIA do not usually list goals for the student to become independent or include a fading plan for the SCIA, which would provide essential guidance. Forms for a more streamlined process are included in Appendix C to this report.

The district also does not have forms to clarify process and procedure for extended year services or transportation. Staff reported that all students in an SDC program are eligible for extended year services and generally also for door-to-door or curb-to-curb special education transportation. Forms and guidelines for special education procedures are readily available. Many SELPAs have these on their websites, and examples of these forms are included in Appendix D to this report.

Communication with Business Services

The business department is responsible for generating the NPS contracts and the individual service agreements for all students placed in an NPS. Business Services is usually informed that a student is being placed in an NPS after the placement IEP meeting, but on some occasions the department has not known about the placement until an invoice arrives from the NPS. On occasion Business Services has not been informed that a student has moved out of the district or receives related services that were not included in the base rate for the NPS. Regular communication with Business Services regarding NPS students is essential for budgeting and for accurate invoice processing.

Business Services also is responsible for generating NPA contracts and independent contractor agreements. The department usually is informed that a student will receive these services. However, on occasion Business Services is not informed that a student has moved out of the district or that services have changed. As stated above, regular communication with Business Services regarding NPA students is essential for budgeting and for accurate invoice processing.

Recommendations

The district should:

1. Based on staff input, prioritize the areas where the district lacks or needs to revise procedures and criteria. Develop these procedures and criteria, provide them on the district website to all special education and site administrators and train each of these groups. Consider distributing and training on the new procedures after each identified area or group of identified areas is completed so staff can begin to implement key procedures.
2. Convene a district task force this summer to determine a new special education delivery system. Visit key RtI and learning center sites, such as Yucaipa in San Bernardino County.
3. Review the use of resource specialist and special day class titles to determine if changing these to specialized academic instruction teachers would enable more collaboration, mainstreaming and increase student performance by reducing the separation of special education students.
4. Develop a plan to ensure that mild/moderate students who require specialized instruction for more than 50% of their day are taught at their home school through learning centers and collaboration. Information regarding learning centers is included as Appendix E to this report.
5. Ensure that administrators for both regular education and special education are trained in all changes to the delivery system before implementation.
6. Develop clear criteria for determining which types of coursework will lead to a diploma or certificate of achievement. For mild/moderate students who will not receive a diploma, develop a comprehensive course of study to meet their academic and life-skills needs.
7. Ensure that all students receive either a full triennial assessment or a review of records with a written report for their triennial.
8. Develop programs to address the needs of the more behaviorally challenged special education students.
9. Develop program or programs for autistic elementary students that address their unique needs that are not met in a more traditional SDC.
10. Reconfigure the autism collaboration teacher program to increase the level of support to students with autism in the least restrictive setting.

- a. Consider forming a team of two highly qualified autism specialists and 4-6 high trained instructional assistants.
 - b. Establish criteria for accessing these services
 - c. Have this team provide on-site training to staff in developing behavior plans, data collection and implementation of behavior plans and provide parent training and support.
 - d. Assign the instructional aides to specific students to model for staff data collection and plan implementation, and to fill in as needed when unexpected situations arise.
11. Develop a more intensive class for emotionally disturbed students with a strong therapy component to reduce placements in the SELPA day treatment program, nonpublic schools, and residential placements.
12. Develop criteria to determine how special education students can access the programs at the magnet and alternative high schools if they require more than 50% of their day in specialized instruction. Train staff in this process.
13. Schedule quarterly meetings of business and special education leadership to increase communication of budget issues, develop the projected budget for each school year, and provide consistency and accuracy regarding NPS and NPA billings.
14. Continue operating the California Avenue School and monitor staffing closely to contain costs.
15. Request that the strategic planning team evaluate the effectiveness of operating programs and services for the Sierra Vista population on a segregated site.
16. Consider whether options can be developed on comprehensive campuses to foster integration and placement in the school of residence.
17. Consider the costs of operating a segregated site and determine whether there are more efficient yet compliant ways to serve students.

Transportation

Routing Efficiency

The district provides transportation service to approximately 2,679 students daily, more than 10% of the total district student population. District source documentation shows that the district transports approximately 779 special education students, plus another 1,900 students in general education home-to-school transportation. The number of special education students receiving transportation service as an identified related service through their IEP has decreased by almost 10% during the 2011-12 school year. This significant decrease is in marked contrast with the steady increase of students identified for transportation services over the past five years. The Transportation Department's student intake listing and routing shows special education students receiving transportation as follows:

Non-public program placement	62
Public schools outside Vista USD	30
Preschool	109
K through fifth grade	313
Sixth through eighth grade	99
Ninth through twelfth grade	129
Transition	37
Total	779

The Transportation Department operates 67 school bus routes, 51 of which transport the 779 special education students who require transportation. The program lacks sufficient buses to meet the daily demand of special education routes. In an attempt to operate efficiently and address the shortage of operational buses, 46 special education routes utilize the smaller Type II special education buses, two routes utilize larger Type I school buses, two routes utilize district passenger vans and one route utilizes a district truck.

Bus routing is input into Microsoft Word to begin the routing process. The district uses Transfinder, an electronic routing system, to help develop and produce routing sheets and optimize school bus routes. Staff who perform routing tasks have not yet been trained on the software; however, the director is familiar with its operation. The district has owned the software for approximately one to two years, but did not purchase on-site or off-site training. The scheduling staff and the operations supervisor need to become familiar with the software and how to navigate the many modules the system provides to assist in scheduling.

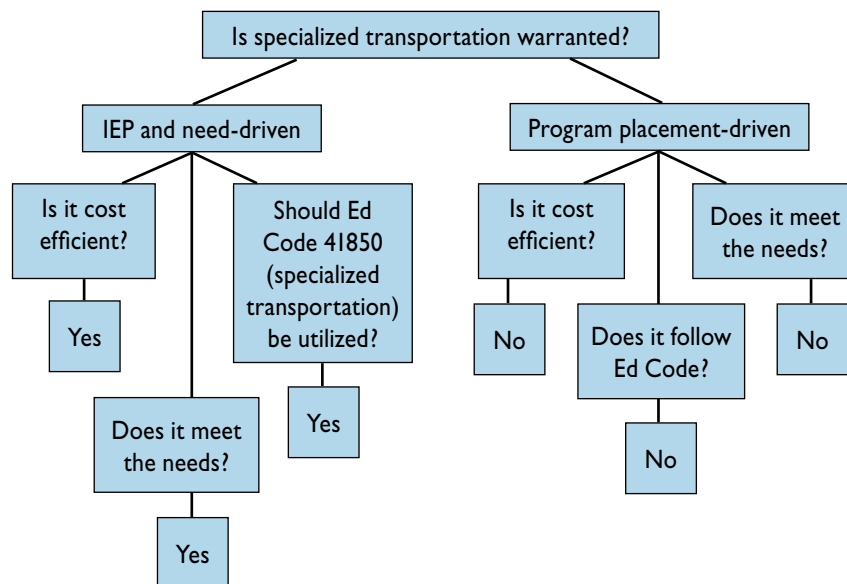
Special education transportation requests are generated by the special education secretary, who generates the request from the student's IEP. A program specialist or the director of special education reviews the request to ensure it is appropriate. The request form is then sent to the Transportation Department, where it is logged into an intake spreadsheet containing specific student data. This process appears appropriate and efficient. However, once transportation

service is identified, no discussion occurs regarding how to accomplish it in the least restrictive manner. A sample review of the requests suggests that the IEP team assumes that transportation is provided curb-to-curb from the student's residence to their school or program site.

A transportation request form generated concurrent with the student's IEP would allow for discussion with the IEP team about how to provide transportation in the least restrictive environment. For example, the student's needs may be met by inclusion on a district home-to-school route, if appropriate, or by walking to a central school bus stop or street corner to develop independence.

Transportation decisions should be based on students' needs rather than on the special education program in which they participate. Not all students need specialized transportation to benefit from education. In complicated cases, someone from the Transportation Department should attend the IEP meeting. Transportation should be discussed at every IEP meeting, but this is not always the district's practice.

The district may benefit from using a decision tree or similar strategy to determine whether transportation is warranted for a student to benefit from education, as in the following example developed by the Fresno County Office of Education.



Bell Schedule

A school district with transportation service to most of its school sites should have a master multi-tiered school start and end time schedule to ensure optimum efficiency and use of its school bus fleet. In addition, a standardized release schedule allows the driver to release the students on arrival at the school or at a designated time, such as 15 to 30 minutes prior to the start of school. Currently, each school site self-determines its acceptance of students on arrival, which in some cases results in the bus waiting for staff until immediately prior to the first bell sounding the start of school.

Vista USD has a three-tiered master bell schedule for its school sites, but the three tiers are not sufficiently staggered to optimize bus usage. Approximately 35 minutes is all that separates the three tiers. Given the travel times throughout the district, at least 45 to 50 minutes should sepa-

rate each tier start and dismissal time. By strategically placing the schools within each start and end time tier and separating each tier by 45 to 50 minutes, the district could reduce bus routing by two to four routes. Data indicates that the salary and health and welfare benefit costs for an average Vista USD school bus driver is \$54,000; a potential savings of between \$108,000 and \$216,000. An additional \$12,000 to \$24,000 in bus operational cost also could be realized for an approximate total savings of between \$120,000 and \$240,000.

The transportation director and transportation operations supervisor reported that the district has a calendar committee and bell schedule committee; but neither the director of transportation nor a designee participates in these planning groups. Both the district calendar and master bell schedule greatly affect transportation service efficiency. Transportation related input could help the district produce a student calendar and bell schedules that are in the best interest of students and parents.

Recommendations

The district should:

1. Provide on-site or off-site hands-on Transfinder routing software training for the transportation operations supervisor and both transportation dispatcher-schedulers.
2. Generate and implement a thorough special education transportation request form that is generated with a student's IEP to ensure service is provided in the least restrictive environment.
3. Include the director of transportation or designee at IEP meetings that include complicated transportation issues.
4. Implement a district-wide protocol for accepting students from a bus route on arrival, such as 15 to 30 minutes prior to the beginning of school, to allow the bus to move on to its next route on time.
5. Consider increasing the separation of time between each of the three master bell schedule tiers from 35 minutes up to 45 to 50 minutes to allow for the possible reduction of two to four school bus routes and a transportation savings of approximately \$120,000 to \$240,000.
6. Add the director of transportation or a designee to the management team that determines the district's master bell schedule and school calendar.

Staffing

The director of transportation conducts the administrative oversight, planning and supervision of the district's comprehensive transportation program. An operations supervisor and a vehicle maintenance supervisor assist the director. In the operations section, two transportation dispatchers/schedulers aid the operations supervisor in creating and maintaining school bus routes transporting approximately 2,679 students daily. The operations supervisor and schedulers open the transportation facility at 5 a.m. and close the offices at 5:30 p.m., address the driver coverage/absenteeism needs, adjust routes to staffing levels for the day, schedule new intakes of special education students, schedule field trips and alter daily routing to support periodic minimum school days.

As a result of fiscal challenges and budget reductions, the transportation program has reduced its non-mandated home-to-school transportation service and some support staff over the last few years. Special education transportation service has increased during the current school year and remains significant. The transportation support staff has been reduced to a minimum level as compared to other similar-size transportation programs FCMAT has reviewed. The district provides transportation service to more than 10% of its total population and approximately 10% of the district's identified special education students. The district operates 67 bus routes transporting over 2,600 students daily along with transportation for more than 2,000 field trips annually.

The district's transportation support staff handles the home-to-school, special education and field trip scheduling. In addition, these staff members handle the parent, school and community telephone calls and the daily routing needs of school bus drivers. In comparable programs of this size, recommended staffing for the operations section of transportation would be two to three full-time transportation schedulers/dispatchers.

The staff struggles to meet their scheduling demands with one full-time transportation dispatcher/scheduler and one transportation dispatcher/scheduler who works 199 days per fiscal year with five weeks off. The assigned five weeks off are from the last week of June through July, which is the busiest time for annual scheduling updates from special education, extended school year transportation scheduling for the summer program, and the annual route planning for home-to-school transportation. The loss of a scheduler during the busiest time period creates a strain on staff and requires the operations supervisor to perform routine scheduling duties instead of planning and overseeing work flows to prepare for the fall school start-up.

The district employs 65 permanent school bus drivers. Four of these drivers are not assigned to a specific route and function as substitute drivers. There are six unassigned school bus routes, four of which are special education routes. The district has nine qualified van drivers, who often are driver candidates. However, this number fluctuates depending on the number of staff in training for their school bus certificate. In addition, the district employs eight transportation assistants, or bus aides. This number will fluctuate because two transportation assistants also are van drivers.

The Transportation Department organizational chart identifies only one bus driver trainer. The California Department of Education School Bus Transportation Section recommends one trainer per 25 certified school bus drivers. However, most school districts do not meet this recommendation; they may augment their certified instructional staff by employing designated behind-the-wheel instructors who work under the direction of a state certified instructor. The district does not utilize behind-the-wheel instructors. The ratio of one bus driver instructor to district certified school bus drivers is very high given the necessary record development, review, retention,

behind-the-wheel training and classroom in-service training. The district's certified school bus instructor utilizes selected school bus drivers to perform driver proficiency evaluations. Although specific instruction may not be occurring, official state training credit is being given on the state Department of Education Training Certificate, form T-01. It is inappropriate for in-service training time to be given without a state certified school bus driver instructor performing the instruction or ride checks.

Recommendations

The district should:

1. Ensure that both schedulers are available for the high volume of scheduling required over the summer.
2. Consider increasing the transportation dispatcher/scheduler positions from two to three.
3. Recruit and train drivers to fill the six unassigned school bus routes.
4. Cease documenting official in-service on state Training T-01 forms when the ride checks or proficiencies are not performed by a state certified instructor.
5. Consider utilizing designated behind-the-wheel instructors.

School Bus and District Vehicles

The district has a significant shortage of vehicles available to meet its transportation needs. Although the district has an inventory of 90 school buses, six buses are nonoperational and beyond economical repair, resulting in 84 units available to operate 67 school bus routes daily. Although the spare ratio is 20%, an analysis of the district's daily school bus repair report for the two weeks prior to fieldwork for this study showed an unusually high number of daily units as out of service for both preventative maintenance and general repairs. Each day, the out of service log lists 15 to 20 buses as non-operational. The high number of non-operational buses often exceeds the 17 spare buses, resulting in the need to utilize other district vehicles to complete the routes. A thorough analysis of the reasons for daily bus nonoperational status needs to be done to determine if this issue relates to the age and needed repairs of the district's school bus fleet or may relate to the workflow in the vehicle maintenance program.

An assessment of the district's annual school bus report and inventory list shows that the average age of a district bus is 16 years based on the 90 units listed in the report. However, extrapolating the four buses that have been nonoperational for the full year shows that the district fleet has accumulated over 17,511,000 miles, with the average unit miles at 203,606.

The California Association of School Business Officials (CASBO) School Transportation Performance Profile recommends criteria for creating a school bus fleet replacement program. School buses are identified in one of four categories based on their chassis weight and design, and replacement is suggested as follows:

- Type II School Buses (Designed for carrying no more than 16 passengers plus the driver, or manufactured on or after April 1, 1977 with a manufacturer's gross vehicle weight rating of 10,000 or less and designed for carrying not more than 20 passengers and the driver): 7 years/100,000 miles
- Type I Conventional School Buses (designed for carrying more than 16 passengers and the driver): 15 years/200,000 miles
- Type I Transit (non-integral construction) (designed for carrying more than 16 passengers and the driver): 15 years/250,000 miles
- Type I Transit (integral construction) (designed for carrying more than 16 passengers and the driver): 20 years/300,000 miles

As a result of the shortage of school buses, the district utilizes other district vehicles to transport students. Transportation programs often use a passenger van or SUV type of vehicle for efficiency when there are fewer than nine students to transport and/or when one or two students attend an isolated program site and the routing makes it more efficient than scheduling the student on a bus route. However, during the course of FCMAT's fieldwork, district staff reported that a district truck was utilized twice to transport a student. General passenger vehicles do not meet the same stringent body design and crash impact standards as a certified school bus. Furthermore, placing a student in the front seat of a passenger vehicle or truck is not a prudent practice because it places the student in close proximity to the driver and reduces the frontal impact shock that can be absorbed by a passenger riding in a rear seat, with the back of the seat in front of them to provide shock absorption in the event of a crash.

Recommendations

The district should:

1. Determine the causes for the excessively high number of nonoperational buses that result in an insufficient number of available buses to meet the district's transportation needs.
2. Explore the replacement of aging school buses.
3. Reconsider the practice of utilizing district trucks to transport students when vehicle shortages exist.

Intra- and Interdepartmental Communication

The administration of Special Education and Transportation do not hold regular meetings that would potentially allow both programs to quickly resolve challenges and concerns and provide an avenue for both effective and ongoing communication.

Formal communication among transportation leadership staff does not occur regularly. The director does not schedule specific times for key staff meetings with an agenda to allow for staff collaboration. Although informal discussions may occur in general work areas, often they are not attended because they are not viewed as mandatory or essential. In some cases, informal discussions may occur when key staff is not present or available. Staff desires devoted time by the director and a more formalized process to address current issues affecting the transportation

program, with research, follow-up and time for open discussion as a team regarding these issues and the department's future plans.

All transportation staff appears to work diligently, and may feel there isn't time for open communication as a leadership team. The transportation operations supervisor, driver instructor, vehicle maintenance supervisor and schedulers need to meet regularly with the director of transportation to share challenges, planning and the impacts each have on the other from the various aspects of transportation work. Additionally, there appears to be a communication challenge between the vehicle maintenance shop and the operations staff that may affect the daily transportation of students because the shop does not understand the number and types of vehicles needed to accomplish the workload.

Although transportation staff works closely with the special education secretary to ensure student transportation requests are communicated, the director and/or operations supervisor do not appear to be included in student IEP meetings where transportation services may be an issue for discussion.

Recommendations

The district should:

1. Schedule routine meetings between key leadership staff in the Special Education Department and the director of transportation and transportation operations supervisor to discuss common goals, challenges and needs.
2. Implement regularly scheduled transportation staff meetings between the director of transportation, supervisors, and other personnel on the department's leadership team. Encourage informal discussions as needed among department work groups.

Appendices

Appendix A - Example of Excess Costs Calculation

Appendix B - Size and Scope Requirements

Appendix C - Forms for Determining One-to-One or Special Circumstances Aide

Appendix D - Forms and Guidelines for Specialized Procedures

Appendix E - Information on Learning Centers

Appendix F - Study Agreement

Appendix A

NCCSE SELPA
Vista Unified School District
Excess Cost Calculation
FY 2011-2012

The excess cost calculation determines what excess costs are; maintenance of effort (MOE) demonstrates that you have not supplanted local funds with IDEA funds to pay those excess costs.

Except as otherwise provided, amounts provided to an LEA under Part B of the Act may be used only to pay the excess costs of providing special education and related services to children with disabilities. Excess costs are those costs for the education of an elementary school or secondary school student with a disability that are in excess of the average annual per student expenditure in an LEA during the **prior school year** for an elementary school or secondary school student, as may be appropriate. An LEA must **spend at least the average annual per student expenditure** on the education of an elementary school or secondary school child with a disability **before funds under Part B of the Act are used** to pay the excess costs of providing special education and related services.

The excess cost test requires that the LEA spend in aggregate at least as much on the non-special education of children with disabilities as they spend on non-disabled children at that educational level, before spending IDEA funds.

Section 602(8) of the Act and § 300.16 require the LEA to compute the minimum average amount separately for children with disabilities in its elementary schools and for children with disabilities in its secondary schools. Calculations must be made separately for elementary schools and secondary schools in an LEA. LEAs may not compute the minimum average amount it must spend on the education of children with disabilities based on a combination of the enrollments in its elementary schools and secondary schools.

The example below shows how to compute the minimum average amount an LEA must spend for the education of each of its elementary and secondary school children with disabilities under section 602(3) of the Act before it may use funds under Part B of the Act.

There are no official rules on how to break out elementary from high school for a unified district. It has been suggested that LEAs can use a variety of approaches. One approach is to split based on certificated full time equivalent (FTE). To do this the LEA should count the number of certificated FTE in Elementary and the number of certificated FTE in Secondary and pro-rate expenditures proportionately. If FTE serve in a district-wide capacity, pro-rate them in a reasonable manner.

For the year ending June 30, 2011, districts must submit this template (see below) to their Special Education Local Plan Area (SELPAs) with the signature of the CBOs or designees on or before September 15, 2011. SELPAs must consolidate their districts excess cost reports, and these reports must be available on request of the Special Education Division.

NOTE: FILL IN YELLOW HIGHLIGHTED CELLS ONLY

TOTAL EXPENDITURES	Local Definition	
	% ELEMENTARY	% SECONDARY

Enter certificated staff FTE %s

51.00%

49.00%

Section a. First the LEA must determine the total amount of its expenditures for students from all OPERATING funds—local, State, and Federal (including Part B)—in the **prior school year**. (Use FUNDS 01-09, 13, and 61-62 ONLY)

Item 1 State and Local Expenditures - FD 01-09, 13, 61, 62; RS 0000-2999 and 6000-9999	\$	161,953,893	\$	82,596,485	\$	79,357,408
Item 2 Federal Expenditures - FD 01-09, 13, 61, 62; RS 3000-5999 (excluding 3355 & state portion of 3385)	\$	23,718,639	\$	12,096,506	\$	11,622,133
Item 3 Total Expenditures	\$	185,672,532	\$	94,692,991	\$	90,979,541

Section b. Next, the LEA must subtract from the total expenditures calculated in section a. above all amounts spent in **prior year** for the following resources (these are considered supplemental expenditures). These are actual expenditures only. (Use FUNDS 01-09, 13, and 61-62 ONLY)^{Printed}

Item 4 Total Expenditures	\$	185,672,532	\$	94,692,991	\$	90,979,541
Item 5 IDEA, Part B allocation - RS 3310, 3311, 3313, 3314, 3319, 3322, 3324, 3329, 3334, 3404, 3386	\$	6,448,508	\$	3,288,739	\$	3,159,769
Item 6 Title I, Part A Allocation - RS 3010, 3011, 3012, 3013, 3175-3178, 3185	\$	6,696,417	\$	3,415,173	\$	3,281,244
Item 7 Title III, Part A & B Allocation - RS 4201-4204	\$	540,363	\$	275,585	\$	264,778
Item 8 State & Local Funds Spent for Children With Disabilities - Goal 5xxx	\$	30,902,362	\$	15,760,205	\$	15,142,157
Item 9 State & Local Funds Spent for Title I, Part A & Title III, Parts A & B (GF contributions)	\$	-	\$	-	\$	-
Item 10 Total Expenditures less supplemental expenditures	\$	141,084,882	\$	71,953,290	\$	69,131,592

NCCSE SELPA
Vista Unified School District
Excess Cost Calculation
FY 2011-2012

Section c. Next, deduct capital outlay and debt service for resources not listed in section b. above. (FUNDS 01-09, 13, 61-62 ONLY)

Item 11 Total Expenditures less supplemental expenditures	\$	141,084,882	\$	71,953,290	\$	69,131,592
Item 12 Capital Outlay and Debt - OBJ 6xxx, &/or OBJ 7438, &/or OBJ 7439, &/or FUNCTION 8500	\$	1,109,118	\$	565,650	\$	543,468
Item 13 Total Expenditures less Capital Outlay & Debt	\$	139,975,764	\$	71,387,639	\$	68,588,124

Section d. Next, the LEA must determine the average annual per student expenditure dividing the average number of students enrolled in the school of the agency during the prior year (including its children with disabilities) into the amount computed under the above paragraph. The amount obtained through this computation is the minimum amount the LEA must spend (on the average) for the education of each of its children with **disabilities "before" Part B funds may be used.**

Item 13 Total amount for average calculation	\$	139,975,764	\$	71,387,639	\$	68,588,124
Item 14 Number of students enrolled in prior school year - CBEDS, ALL students (General Ed and Special Ed)		22,415		15,614		6,801
Item 15 Average annual expenditure per student	\$	6,245	\$	4,572	\$	10,085

Section e. Next, to determine the total minimum amount of funds the LEA must spend for the education of its children with disabilities in the LEA (not including capital outlay and debt service), the LEA must multiply the current fiscal year's number of children with disabilities in the LEA times the average annual per student expenditure obtained in paragraph d above. Funds under Part B of the Act can only be used for excess costs over and above this minimum.

NOTE: Item 17 below requires you to calculate the amount of time each student is actually in special ed classes. CASEMIS data specifies the percentage of time that each student is in General Education. Use this information for each special ed student to get a FTE on each. See attached worksheet for calculation instructions

Item 16 Average annual expenditure per student	\$	6,245	\$	4,572	\$	10,085
Item 17 Number of full-time special ed student equivalents (FTE of time spent in special ed classes)		1,094.61		558.25		536.36
Item 18 TOTAL MINIMUM AMOUNT THAT MUST BE SPENT BEFORE USING PART B FUNDS (Excess Cost)	\$	6,835,551	\$	2,552,339	\$	5,409,183

Section f. Finally, determine how much was spent in current year on district children with disabilities and verify this amount is equal to or exceeds the amount calculated in section e. above (FUNDS 01-09, 13, 61-62 ONLY)

Item 19 TOTAL MINIMUM AMOUNT THAT MUST BE SPENT BEFORE USING PART B FUNDS (Excess Cost)	\$	6,835,551	\$	2,552,339	\$	5,409,183
Item 20* and Goal 5XXX	\$	34,302,877	\$	17,494,467	\$	16,808,410
Item 21** Amount spent on children with disabilities in excess of requirement*	\$	27,467,326	\$	14,942,128	\$	11,399,227

* Note: Item 20 is not the same as line 9 above. This is CURRENT YEAR, line 9 is prior year, Does not include SACS supplemental form (PCRAF). Information from the PCRAF is not included in this worksheet.

** Note: Item 21 should be a positive amount. If it is a negative then the LEA has not met the excess cost requirement and may not use any of **their** federal IDEA Part B funds.

Official Designee Teresa Baker
 Chief Financial Officer Casi Wells
 Vista Unified School District

Appendix B

Size And Scope

Of Special Education Local Plan Areas as approved by the State Board of Education at the November 17-18, 1983 meeting.

The county superintendent of schools shall submit to the Superintendent of Public Instruction a description of how districts within the county intend to develop special education local plans (*Education Code* 56140).

The following standards are to be used by the county and districts to determine if they are of sufficient size and scope to qualify as a Special Education Local Plan Area (SELPA) (*Education Code* 56195.1). ¹

In addition to being of sufficient size and scope to qualify as a SELPA, the SELPA shall cooperate with the Office of the County Superintendent of Schools and other school districts in the geographic area in order to assure that the SELPA is compatible with other SELPAs in the county, as required by *Education Code (EC)* Section 56195.3. ²

A region may not become a SELPA without approval of the SELPA by the county superintendent or a decision of the Superintendent of Public Instruction to overrule the disapproval of the county superintendent of schools, pursuant to *EC* Section 56140.

Metropolitan Areas

A metropolitan area is defined as an area that has a pupil population density of 200 pupils or more per square mile. Population density is computed by dividing total number of K-12 pupils in the SELPA by the square miles to determine number of pupils per square mile. All SELPAs in metropolitan areas shall have comprehensive special education programs. A county superintendent of schools may allow a minimum of contract services for low-incidence programs with justification, in addition to utilizing State Special School programs for low-incidence sensory-handicapped pupils.

Single-District SELPAs

A single district must have kindergarten through 12 grades and 30,000 or more pupils

Multi-District or District-County SELPAs

Method One:

- Kindergarten through 12th grade
- 30,000 or more pupils
- No more than 15 miles from border to border of the SELPA at the longest distance

Method Two:

- Kindergarten through 12th grade
- 25,000 to 30,000 pupils
- No more than 20 miles from border to border of the SELPA at the longest distance

Method Three:

- Kindergarten through 12th grade
- 20,000 to 25,000 pupils
- No more than 30 miles from border to border of the SELPA at the longest distance

Non-Metropolitan Areas

Population density of less than 200 pupils per square mile

Single-District (Non-Metropolitan Area) SELPAs

In a non-metropolitan area, a single-district plan shall have:

- 15,000 or more pupils

- A comprehensive special education program

- Contracting may be allowed, with justification, for low-incidence programs

Multi-District, District-County, Multi-County SELPAs (Non-Metropolitan Areas)

- Must have a comprehensive special education program

- Contracting is allowed, with justification, for low-incidence programs in addition to utilizing State Special School programs for sensory-handicapped pupils

Contracting

All contracts for low-incidence programs shall contain the clause that neither party may cancel the contract without a 12-month notice or upon mutual agreement of all parties to the contract.

Note: While the State Board of Education-adopted standards specifically address kindergarten through twelve grades, it is important to note that SELPAs are responsible for planning and coordinating services for all children with disabilities birth to twenty-two years of age.

¹ EC Section changed pursuant to AB1115, Chapter 78, Statute of 1999

² EC Section changed pursuant to AB602, Chapter 854, Statute of 1997

Appendix C

Summary of Evaluation for Additional Support

STEP THREE
INFORMAL
MEETING

Student: _____ District: _____ DOB: _____

Age: _____ ☐ Male ☐ Female Grade Level: _____ School: _____

Parent/Guardian: _____ Home Phone: _____

Based on documentation and observation the following is recommended:

- ☐ Implementing alternative strategies
- ☐ Structuring the environment
- ☐ Using existing staff members (specify time and activity)
- ☐ Increasing training
- ☐ Special circumstance instructional support in the following areas of intensive need:

Health/Personal Care	Behavior	Instruction	Inclusion/Mainstreaming
<input type="checkbox"/> Implementation of specialized health plan	<input type="checkbox"/> Implementing individualized behavior plan	<input type="checkbox"/> Provide physical prompts	<input type="checkbox"/> Direct adult instruction
<input type="checkbox"/> G-tube	<input type="checkbox"/> Implementing crisis intervention techniques	<input type="checkbox"/> Provide verbal prompts	<input type="checkbox"/> Provide physical support/positioning
<input type="checkbox"/> Suctioning	<input type="checkbox"/> Redirecting/removing from class	<input type="checkbox"/> Structured teaching/assignments	<input type="checkbox"/> Provide safety/close visual supervision
<input type="checkbox"/> Providing physical support/positioning	<input type="checkbox"/> Prohibiting elopement of student	<input type="checkbox"/> Support use of assistive technology	<input type="checkbox"/> Facilitating social interaction with peers
<input type="checkbox"/> Toileting	<input type="checkbox"/> Providing safety supervision	<input type="checkbox"/> Implement individualized methodologies	<input type="checkbox"/> Adapting materials
<input type="checkbox"/> Feeding-full support	<input type="checkbox"/> Supervision during breaks	<input type="checkbox"/> Provide signing	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Other: _____	<input type="checkbox"/> Other: _____	

Describe how assistant will be provided training.

For EACH area of intensive need marked above indicate which IEP goal objective addresses the area of intense need. Use additional paper if needed to describe all the needs.

Describe school day description and assistance needed. Specify time(s) and activity(ies). Use additional paper if needed.

Description and Assistance

Please describe the school day, the assistance now provided, and the comments.

[illegible]

IEP Goals and Objectives Charting

Student: _____

School Year: _____

LEVELS OF ASSISTANCE

5 = INDEPENDENT
 4 = GESTURE/NON VERBAL/VISUAL CUE
 3 = VERBAL CUE
 2 = MODEL
 1 = PHYSICAL PROMPT

GOAL NUMBER	LEVEL OF ASSISTANCE	COMMENTS
	5 4 3 2 1	
	5 4 3 2 1	
	5 4 3 2 1	
	5 4 3 2 1	
	5 4 3 2 1	
	5 4 3 2 1	
	5 4 3 2 1	

SAMPLE

Appendix D

ESY SURVEY FOR IEP TEAM CONSIDERATION

Student Name: _____ Grade: _____ Track: _____ School: _____

YES NO

☐ ☐

A. 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 (four week)?

☐ ☐

B. Degree of progress toward critical life skills

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

☐ ☐

C. 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?

☐ ☐

D. Interfering behavior

Without ESY services, will the interruption of programming which addresses interfering behaviors such as stereotypic, ritualistic, aggressive or self injurious behavior targeted by IEP objectives be likely to prevent the student from receiving benefit from his/her educational program during the subsequent return to school?

☐ ☐

E. Nature and/or severity of disability

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?

☐ ☐

F. 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?

IEP Team recommendation:

If the IEP team answers YES to all the above, ESY services(s) is/are required to provide this student with a free appropriate public education.

DESCRIPTION OF ESY SERVICES: _____

Attach this to the student's IEP.

10/20/06

Transportation Requirements Assessment

(Adapted from Beaumont USD)

IMPORTANT: ALL INFORMATION CONTAINED ON THIS FORM IS STRICTLY CONFIDENTIAL. DISCLOSING THIS INFORMATION TO ANY PARTY NOT DIRECTLY RESPONSIBLE FOR THE SAFETY AND WELFARE OF THE CHILD IS A VIOLATION OF STATE AND FEDERAL LAW.

Child's Name: _____ Student ID: _____
 School: _____ Grade: _____
 Date: _____ 1. Disability

1. 1a. What is the child's disability? _____

2. 1b. Yes No ☐ Are there specific IEP goals for the child's bus ride?
3. 1c. If yes, what are they? _____

2. Behavior and Supervision on the Bus Ride

1. 2a. Yes No Can the child be safely included on a bus with typical children?
2. 2b. Yes No Does child exhibit behavior aggressive or potentially dangerous to self/others?
3. 2c. Yes No Are there specific "triggers" or situations known to provide the child?
1. 2d. If yes, what are they? _____

2. 2e. Yes No Is there a behavioral intervention plan in place for the child?
(attach copy if yes)
3. 2f. Yes No Does the child require additional adult supervision on the bus
besides the driver?
4. 2g. If an attendant is required, is specialized training needed? (circle any
topics that apply)
Violence prevention training Epi-Pen training CPR certification
Other specialized training (describe):

5. 2h. Yes No Does the child require an individualized, one-on-one attendant
during bus rides?

3. Vehicle and Equipment Needs

1. 3a. Yes No Can the child use the vehicle stairs to enter and exit the bus?
2. 3b. Does child use braces, a walker, manual wheelchair, or power
wheelchair? (If yes, circle which)
3. 3c. If child uses a wheelchair, indicate dimensions and any special
features (e.g., tilt-in-space, etc.):
Width: _____(in inches) Length: _____ (in inches) Special features:

4. 3d. Yes No If child's wheelchair has a lap tray, may it be safely removed
during the bus ride?
5. 3e. Yes No Can the child be safely transported to a school bus seat for the
bus ride?
If yes, are special restraints
required? _____ If yes, what
assistance is
required? _____ How much
does the child weigh?

4. Medical Concerns

1. 4a. Yes No Does the child have a potentially life threatening condition or illness that requires monitoring, evaluation, and possible intervention by a nurse or other medical professional during the bus ride? If yes, what is the condition or illness? _____
2. 4b. Yes No Does the child use assistive devices or medical technology such as tracheotomy or feeding tubes, ventilator, oxygen, suctioning devices, or wear a helmet or other protective gear? If yes, describe the device or technology required:

3. 4c. Yes No Does the child experience uncontrolled seizures, severe hypotonia resulting in constricted airway, or apnea? If yes, circle which and attach medical assessment.
4. 4d. Yes No Will the bus staff be expected to perform any medical procedure or operate any medical equipment during the bus ride? If yes, what procedures or equipment? _____

5. 4e. Yes No Does the child experience severe allergic reactions? If yes, allergic to what?

6. 4f1. Yes No ☐ Does the child carry an "Epi-Pen?"
7. 4f2. Yes No ☐ If yes, is the child trained in how to self-administer the Epi-Pen?
8. 4g1. Yes No ☐ Does the child require medication to be transported on the bus? If yes, specify type(s) of medication and the amount(s) to be transported: _____

9. 4g2. If yes, must the medication be available for the child to use during the bus ride, or is the medication only to be transported between home and school? _____
10. 4g3. If yes, must the medication be available for the child to use during other activities/field trips requiring

transportation? _____

11. 4h. Yes No ☐ In an emergency, could the child safely be lifted and carried off the bus?
12. 4i. Yes No ☐ Is an Out-of-Hospital "Do Not Resuscitate" Order in effect for the child?
13. 4j. Yes No ☐ Does the child's medical condition require any other special adaptations or restrictions to the bus environment? (e.g., temperature, light, noise, duration of ride, etc.) If yes, what adaptations or restrictions?

5. Special Transportation Concerns

1. 5a. Yes No Can the child be safely picked up and dropped off at a group bus stop?
2. 5b. Yes No Must a designated adult be present to accept custody of the child when dropped off at the bus stop and/or home?
3. 5c. Yes No Does the child require any special seating arrangements (e.g., position on the bus ride)? If yes, what are they?

4. 5d. Yes No Does the child need a child safety restraint system (e.g., car seat, safety vest, etc.) on the bus ride? If yes, what?

5. 5e. Yes No Does the child require an assistance animal during the bus ride?
6. 5f. Yes No Does the child require any special communication techniques (e.g., sign language, sign board, facilitative communication board, etc.)? If yes, what are they?

7. 5g. Yes No Are there any other special concerns that the bus driver, attendant or other transportation staff should know to ensure the safety and welfare of the child during the bus ride? If yes, what are they?

6. Emergency Contacts.

List the names, relationship (i.e., parent, neighbor, physician, etc.) and phone numbers of all emergency

contacts for the child.

Information provided by:

Print name: _____ Signature: _____
_____ Date: _____

Information received by:

Print name: _____ Signature: _____
_____ Date: _____

Appendix E

**Los Angeles Unified School District
Division of Special Education**

Learning Center

Description	A shared classroom or classrooms space where varied levels of intervention and support are provided by a diverse group of educators.
Purpose	<p>The purpose of the learning center is to :</p> <ul style="list-style-type: none"> ▪ Provide instructional support to students with disabilities. ▪ Provide layers of intervention to students with disabilities and students at risk. ▪ Provide a central location for instructional and supplemental resources to support student learning. ▪ Provide a coordinated system for the provision of support services.
Instructional Support	<p>Drop in center for immediate intervention. Example: students flow in and out to take tests, receive immediate intervention tied to the classroom, check in with a home base, etc.</p> <p>Specific instruction in educational strategies. Example: students are pretaught a learning strategy that will be used in content instruction, notetaking, organizational skills, etc. this could take place during advisory or homeroom.</p> <p>Social skill instruction. Example: Elective class: <i>Developing Reading Skills Across the Curriculum</i> Example; students participate in this class for an elective. They are taught targeted strategies for learning from content material. These may include the REWARDS program, designed to teach a strategy for decoding multi-syllabic words, <i>Makes Sense Strategies</i>, a program designed to support students learning of content material or Skills for School Success.</p>
Students served	<p>Students participating general education classes</p> <p>Any eligibilities</p> <p>Students served through both RS and SDP</p>
Staff	<p>General and special education teachers</p> <p>Coaches, and cadre leaders</p> <p>Paraprofessionals, special and general education</p> <p>DOTs personnel</p> <p>Counselors</p> <p>DIS providers</p>
Structure	<p>Aligned with small learning community structure</p> <p>Consolidates resources, puts all materials in one or two central places</p> <p>Provides range of services connected to content curriculum, development of accommodations, fluids supports, intensive supports</p>
Curriculum	<p>REWARDS</p> <p>Algebra Ready</p> <p>Skills for School Success</p> <p>Strategies Intervention Models</p> <p>Content Enhancement Strategies</p>

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**LOS ANGELES UNIFIED SCHOOL DISTRICT
DIVISION OF SPECIAL EDUCATION**

**Frequently Asked Questions
January 2007**

DONNALYN JAQUE-ANTÓN
Associate Superintendent

TOPIC: LEARNING CENTER

INTRODUCTION: The purpose of this FAQ is to clarify the purpose and implementation of a learning center as an essential element in institutionalizing a multi-tiered model of service delivery leading to increased access and achievement of students with disabilities in the core curriculum. Outcome 2 of the Targeted Strategy Plan requires that materials and operational guidelines be provided for elementary, middle school, and high school learning centers.

Question 1: *Is the learning center a new concept?*

Answer 1: No. Learning centers have been an important element in service delivery for students with disabilities for over three years evolving from the traditional Resource Specialist Program. BUL-1258.1 *Description of the Resource Specialist Program and the Role of the Resource Specialist Teacher – Revised* issued in November 2004 described how the learning center should be implemented to provide direct instruction at each of the Tier I, Tier II, and Tier III levels of intervention. Additionally the Division of Special Education issued position papers in 2004 that described learning centers. Since the introduction of collaborative models of instruction in 2000, the Division of Special Education has offered extensive professional development and support regarding the multi-tiered model of service delivery and the implementation of learning centers. These professional development opportunities and support are currently available.

Question 2: *What is the purpose of the Learning Center*

Answer 2: The learning center has three purposes characterized as AIM:

1. A: teach access strategies
2. I: provide intensive intervention
3. M: monitor student progress

Question 3: *Does the learning center require the acquisition of additional classroom space at each school?*

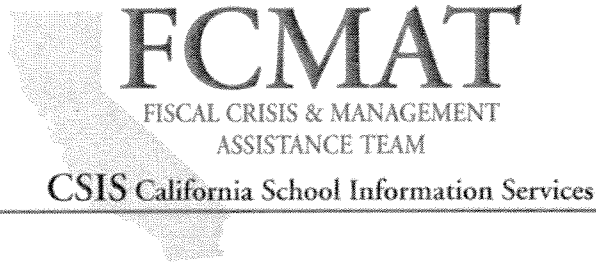
Answer 3: No. In most cases, schools do not require additional rooms beyond what they already have designated for their special education programs to implement a learning center(s). With the implementation of collaborative models of service delivery including co-teaching, resource specialist teachers and special day program teachers were to maintain their designated classroom spaces. The California Education Code § 17047 clearly defines allotted space for the provision of special education services. Schools should look at the utilization of existing space, the number of students to be provided intensive services in the learning center, and the staff who will be providing service in this setting. Existing special education space can be configured to create a learning center for all students while continuing to provide adequate space for teachers to assess students, work individually or in small groups with students, and maintain files and records. There may be rare cases where no separate space currently exists such as at a primary center. Division of Special Education personnel will be available to assist such sites in examining ways to maximize their facilities to provide appropriate programs for students with disabilities in accordance with their Individualized Education Programs.

Special Education Intervention Programs: "Q and A"

- Question 4:** *What equipment and/or furniture are required to implement a learning center?*
- Answer 4: New equipment and/or furniture should not be needed to implement a learning center. However, instructional spaces for students with disabilities including learning centers should be provided with the same basic equipment, furniture and materials as instructional spaces for general education students. Most resource specialist programs and special day programs should already have a computer and a listening center (provided at secondary schools) intended for use with students with disabilities.
- Question 5:** *Who will provide services to students with disabilities in the learning center?*
- Answer 5: The school will analyze data including student assessment results, Individualized Education Program (IEP) goals and designated services, and the number of certificated and support staff in determining the schedule for instruction in the learning center. Generally, special education teachers and paraprofessionals will provide instruction and support for students in the learning center.
- Question 6:** *Will the implementation of the learning center conflict with the provision of collaborative services between general and special educators?*
- Answer 6: No. Students whose IEPs indicate that services will be provided in the general education classroom with collaboration between general and special educators including co-teaching will continue to receive their services in this model. However, some students require more direct instruction related to the core curriculum based on ongoing monitoring. These students are provided opportunities for accelerated learning, intervention, and provision of immediate and corrective feedback in the learning center. The learning center is a dynamic, flexible setting which provides opportunities for students to receive either short or long term intervention(s) based on individual needs. At the secondary level, students may be programmed into the learning center for an elective in the area in which the IEP team has determined that the student needs direct and intensive intervention. General and special educators will continue to collaborate including co-planning for students who receive direct instruction for a period of time in the learning center.
- Question 7:** *What materials are used in the learning center?*
- Answer 7: Materials provided for use in the learning center are supplemental programs to be used with students with disabilities who participate in the core literacy and math program but may require intensive intervention for a period of time. These materials match one of the three purposes of access, intervention, and monitoring. Supplemental materials were identified in *The Los Angeles Unified School District's Position Papers*. Instructional, assessment, and progress monitoring materials being provided address State standards and are used to close the achievement gap and accelerate the rate of achievement for students with disabilities based on assessment of student need. They do not replace the core program nor are they a direct match to the core materials. The learning center materials provided by the Division of Special Education are intended as intervention materials to address specific areas of need for the student. It is assumed that special education teachers are provided with the core literacy and math programs and intervention guides that may be used in the learning center for pre-teaching or re-teaching.
- Question 8:** *Do these intervention programs replace the core program?*
- Answer 8: No. Students with disabilities participating in the core English Language Arts and/or Mathematics curriculum continue to receive instruction in the core programs. Students who receive services in the learning center receive instruction with intervention materials that are intended to accelerate learning for students with disabilities and not to replace core instruction. Instruction in the

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Appendix F

**FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
March 13, 2012**

The FISCAL CRISIS AND MANAGEMENT ASSISTANCE TEAM (FCMAT), hereinafter referred to as the Team, and the Vista 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 Vista 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.

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:

Fiscal:

1. Conduct a comparison of the District's special education encroachment on the general fund with districts of comparable size.
2. Review all staffing levels for certificated and classified employees. Include management level and caseloads per full time equivalent.
3. Compare the percentage of students in nonpublic schools to other districts in the SELPA and region and make recommendations for alternative programs.

4. Analyze the allocation model for the NCCSE SELPA and the determine whether Vista Unified should become its own SELPA.
5. Analyze the infrastructure within the district to support single district status and make recommendations for support ratios to make this transition.
6. Examine the costs of Nonpublic Agencies and the services provided and make recommendations to reduce costs.
7. Examine high cost programs such as California Avenue and Sierra Vista and determine if efficiencies can be implemented.

Transportation:

1. Review the special education transportation system for efficiency and effectiveness and determine any cost savings.
2. Review the overall transportation delivery system, including but not limited to reviewing the role of the IEP, routing, scheduling, operations and staffing.

Program:

1. Determine if the students are over identified for special education and make recommendations for remediation if necessary.
2. Examine the exit rates and referral rates for special education and determine the impact on over identification.
3. Review the special education delivery system and provide recommendations to the district on additional classes or programs that would be necessary if the district's status changes to a single district SELPA.
4. Review state assessment results for special education subgroups and make recommendations on how to improve results.
5. Through classroom and school visitations and interviews review the programs and services available in the district for special education students and determine efficiencies.

B. Services and Products to be Provided

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

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

1. Exit Report - The Team will hold an exit meeting at the conclusion of the on-site review to inform the District of significant findings and recommendations to that point.
2. Exit Letter - The Team will issue an exit letter approximately 10 days after the exit meeting detailing significant findings and recommendations to date and memorializing the topics discussed in the exit meeting.
3. Draft Reports - Electronic copies of a preliminary draft report will be delivered to the District administration for review and comment.
4. Final Report - Electronic copies of the final study report will be delivered to the District administration following completion of the review. Written copies are available by contacting the FCMAT office.
5. Follow-Up Support – Six months after the completion of the study, FCMAT will return to the District, if requested, to confirm the District's progress in implementing the recommendations included in the report, at no cost. Status of the recommendations will be documented to the District in a FCMAT Management Letter.

3. **PROJECT PERSONNEL**

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

A. William Gillaspie	FCMAT Deputy Administrative Officer
B. Trina Frazier	FCMAT Consultant
C. James Kennedy	FCMAT Consultant
D. JoAnn Murphy	FCMAT Consultant
E. Tim Purvis	FCMAT Consultant
F. Mike Rea	FCMAT Consultant
G. Anne Stone	FCMAT Consultant

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

4. **PROJECT COSTS**

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

- A. \$500.00 per day for each Team Member while on site, conducting fieldwork at other locations, preparing and presenting reports, or participating in meetings.

- B. All out-of-pocket expenses, including travel, meals, lodging, etc. The District will be invoiced at actual costs, with 50% of the estimated cost due following the completion of the on-site review and the remaining amount due upon acceptance of the final report by the District.

Based on the elements noted in section 2 A, the total cost of the study is estimated at \$32,700.

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

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

5. **RESPONSIBILITIES OF THE DISTRICT**

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

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

6. PROJECT SCHEDULE

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

Orientation:	<i>April 16, 2012</i>
Staff Interviews:	<i>to be determined</i>
Exit Interviews:	<i>to be determined</i>
Preliminary Report Submitted:	<i>to be determined</i>
Final Report Submitted:	<i>to be determined</i>
Board Presentation:	<i>to be determined</i>
Follow-Up Support:	<i>If requested</i>

7. CONTACT PERSON

Name of contact person: Donna Caperton, Assistant Superintendent, Business

Telephone: (760) 726-2171 x2222 FAX: (760) 631-7029

E-Mail: dcaperton@vusd.k12.ca.us

Joyce L. Bales March 13, 2012
 Joyce Bales, Superintendent Date
 Vista Unified School District

Anthony L. Bridges March 13, 2012
 Anthony L. Bridges, CFE Date
 Deputy Executive Officer
 Fiscal Crisis and Management Assistance Team