



CSIS California School Information Services

Rialto Unified School District

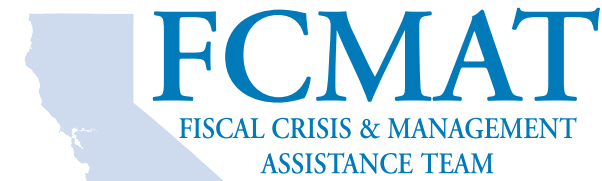
Special Education Review

January 21, 2014



Joel D. Montero
Chief Executive Officer





CSIS California School Information Services

January 21, 2014

Mohammad Z. Islam, Acting Superintendent
Rialto Unified School District
182 East Walnut Avenue
Rialto, CA 92376

Dear Superintendent Islam,

In June 2013, the Rialto Unified School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for a review of special education. Specifically, the agreement stated that FCMAT would perform the following:

Fiscal

1. Determine the district's encroachment on the general fund and make recommendations for greater efficiency.
2. Examine the costs for Nonpublic Schools and Agencies and make recommendations for greater efficiency.
3. Review the costs for all special education programs and services for students placed outside the district, and explore the cost effectiveness of developing program options within the district.
4. Review the due process requests and costs over the past three years and provide strategies for reduction in overall costs and requests.
5. Review the SELPA's plan for the provision of mental health services pursuant to statutory requirements to transfer mental health services from county mental health to the district and review both the fiscal and programmatic impact.
6. Review the process and procedures for LEA Medi-Cal reimbursements and expenditures and make recommendations for greater efficiency.

Special Education Transportation

1. Review the overall transportation special education delivery system, including but not limited to the role of the Individual Education Plan (IEP), routing, scheduling, operations, staffing and cost containment.

FCMAT

Joel D. Montero, Chief Executive Officer

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Program Efficiency

1. Examine district infrastructure supporting special education programs and determine readiness to expand program capacity if needed.
2. Review the current organizational structure of the special education department and compare with comparable size districts. Make recommendations to ensure effective clerical and administrative efficiency.
3. Review the staffing assignment process for certificated and classified staff including tracking of resources, monitoring caseloads, position control and make recommendations for improvement if needed.
4. Review the district's philosophy, programs and procedures in special education to determine whether they are consistently aligned with the district's mission and beliefs and compliance with statutory regulations.
5. Provide an analysis of all staffing ratios, class and caseload using statutory requirements for the provision of mandated special education programs and make recommendations for greater efficiency, if needed.
6. Provide an analysis of all staffing and caseload for the following related services: speech therapy, occupational and physical therapy, psychologists, behavior specialists, adaptive physical education required by federal and state law and make recommendations for greater efficiency, if needed.
7. Examine the use of 1:1 instructional aides and the procedures for identification, placement and fading and make recommendations to improve efficiency.

Program Effectiveness

1. Examine the district's identification and exit rates for students with disabilities to determine if the district exceeds the statewide, county or SELPA average.
2. Review the district's compliance history; identify trends requiring training, monitoring and support.
3. Determine the extent to which students are educated in the Least Restrictive Environment in compliance with statutory requirements and make recommendations if needed.
4. Examine the extent to which students with disabilities are accessing the core curriculum and make recommendations for improvement if needed.
5. Analyze the overall achievement of special education students as a subgroup in relation to Adequate Yearly Progress and targeted proficiency area in English/ Language Arts and Math and make recommendations, if needed.

Communication

Parent Communication

1. Review the communication and problem solving models for parents to build solid trusting relationships with the special education department.
2. Provide an analysis of parent input regarding the opportunities for parent input into program and service development, district outreach and parent communication that currently exist and make recommendations for improvement, if needed.
3. Review the current options for training available in the district for parents of students with disabilities.
4. Review the district website link for special education and make recommendations for improvement if needed to provide strength to the parent district relationship in special education.

Interdepartmental Communication

1. Review the communications system in place between special education and Human Resources, Business, Transportation, Education Services, etc. and make recommendations to increase efficiency, if needed.
2. Review the communication systems between special education and the principals and staff at the school sites and make recommendations as needed.
3. Define the systems in place for communication and approval between business and special education regarding budget increases required during the course of the school year.

This report contains the study team's findings and recommendations.

FCMAT appreciates the opportunity to serve the Rialto Unified School District and extends thanks to all the staff for their assistance during fieldwork.

Sincerely,



Joel D. Montero
Chief Executive Officer

Table of contents

Foreword	iii
Introduction	1
Executive Summary	5
Findings and Recommendations.....	7
Fiscal Issues	7
Program Efficiency.....	21
Organizational Structure and Assignments	25
Staffing Ratios and Caseloads.....	31
Program Effectiveness.....	43
Communication.....	53
Programs, Procedures, Mission, and Beliefs	57
Special Education Transportation.....	59
Appendices.....	69

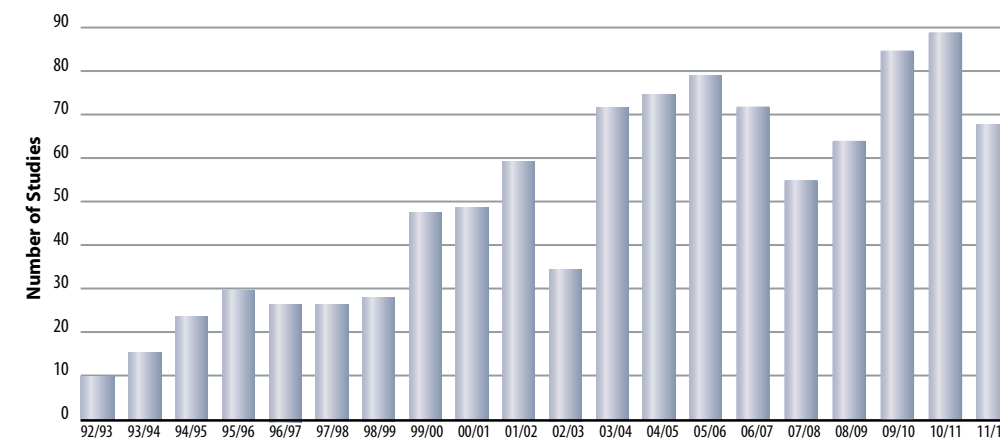
About FCMAT

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

Located in San Bernardino County, the Rialto Unified School District has a general education enrollment of 26,485 students with approximately 3,083 identified for special education. As a member of the East Valley Special Education Local Plan Area (SELPA), the district participates in regionalized programs and services. The district also enrolls approximately 133 of its severely disabled students in the special education programs of the San Bernardino County Office of Education.

With rising costs of special education and the impact on the unrestricted general fund, the district has requested a comprehensive review of special education efficiency and effectiveness in all program areas including transportation.

In July 2013, the district entered into an agreement with the Fiscal Crisis and Management Assistance Team (FCMAT) for a review of special education. The study agreement specifies that FCMAT will perform the following:

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Study Team

The study team was composed of the following members:

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

Study Guidelines

FCMAT visited the district on October 14-18 and 28-31, 2013 to conduct interviews, collect data and review documents. This report is the result of those activities and is divided into the following sections:

- I. Executive Summary
- II. Fiscal Issues
- III. Program Efficiency
- IV. Organizational Structure and Assignments
- V. Staffing Ratios and Caseloads
- VI. Program Effectiveness
- VII. Communication
- VIII. Programs, Procedures, Mission, and Beliefs
- IX. Special Education Transportation
- X. Appendices

Executive Summary

Procedural inconsistencies, ineffective communication systems, and poor data management have resulted in numerous inefficiencies throughout the Rialto Unified School District. There is also a systemic lack of focus on instruction and lack of guidance from the highest level of leadership.

The district's projected 2013-14 unrestricted general fund contribution for special education has increased by \$1,932,642 from the 2012-13 school year. The projected increase is due to salary and benefit increases, nonpublic school costs, and other increased operating costs.

Nonpublic school costs are \$1,493,996 annually and continue to rise. In addition to referrals to the special education local plan area (SELPA), the district has developed an internal referral for nonpublic school (NPS) placements. However, the number of students in nonpublic schools has not decreased. Therefore, the only option in reducing nonpublic school costs is to provide appropriate programs to meet these student needs. FCMAT estimates that the district could realize an estimated cost savings of \$172,110 by creating at least two district-operated alternative programs to serve 20 students instead of placing them in NPSs.

Invoices received by the district indicate that the San Bernardino County Office of Education serves 133 district students with moderate to severe disabilities. The district does not have the capacity to meet the needs of these students. However, with proper planning, staffing and access to appropriate facilities, the district could save approximately \$34,198 per class if some county office programs were returned to the district.

District administration and clerical support in special education are below comparable size districts, which has affected efficiency, responsiveness and compliance with state and federal laws for disabled students. District staff at all levels expressed concerns about programmatic issues in special education and systemic issues related to trust, accountability and decision-making in other central office departments. Staff indicated that there is a systemic lack of focus on instruction, which has affected the overall achievement of special education students. The overall academic achievement of the district's disabled students subgroup is below state and county averages in the percentage of those proficient in English/language arts and math.

Special education is treated as a separate entity and as a result, has been disconnected from the Education Services Department, which has affected overall efficiency and effectiveness in student achievement. Special education should return to the supervision of education services to ensure it is aligned to standards-based curriculum, assessments and necessary staff training.

The district is overstaffed in certificated and classified staffing positions in most areas of special education. In this report, FCMAT recommends a number of staffing reductions that could yield an estimated cost savings of \$1,001,127.

The district transports more than 20% of its special education students, which is double the average transport rate of 10% found in other districts studied by FCMAT. The district should consider the criteria established by individualized education program (IEP) teams to determine the need for transportation as a related service of special education and which students can ride a regular bus. Since 2010-11, the special education transportation contribution from the unrestricted general fund has grown steadily, increasing to more than \$2 million in 2013-14. In this report, FCMAT provides a detailed analysis of the transportation fleet, maintenance and operating procedures and makes several recommendations to improve overall efficiency.

Findings and Recommendations

Fiscal Issues

The Rialto Unified School District tracks its unrestricted general fund contribution based on the actual revenue received and expended. Excess costs are defined as those that are in excess of the average annual per student expenditure in a local educational agency (LEA) during the preceding school year for an elementary school or a secondary school student, as may be appropriate. (34 CFR 300.16)

A review of the district's unrestricted general fund contribution including transportation and students enrolled in the San Bernardino County Office of Education programs indicates that an increase of \$1,932,642 is projected in the general fund contribution for the 2013-14 school year. This projected increase is primarily because of increases in salaries, benefits, operating expenses, transportation, and nonpublic school costs. Changes in the general fund contribution over the last three years as reported by the district are detailed in the table below.

Changes in the District General Fund Contribution over Three Years

Year	Percentage of General Fund Contribution	Amount of General Fund Contribution
2011-12	24.6%	\$5,707,576
2012-13	21.4%	\$5,120,571
2013-14 (projected)	29%	\$7,053,213

Source: District Document Titled Contribution from Unrestricted General Fund to Restricted Programs

Nonpublic Schools

Education Code 56034 defines a nonpublic school (NPS) as follows:

- (a) private, nonsectarian school that enrolls individuals with exceptional needs pursuant to an individual education program and is certified by the department. It does not include an organization or agency that operates as a public 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.

The East Valley SELPA negotiates NPS contracts and develops individual service agreements for SELPA students served in an NPS. The SELPA receives invoices for these students, reviews them for accuracy, and dispenses funds to the NPS. Funding for the NPS placements comes from the following three sources:

- Each member district is allocated a percentage of out-of-home funds received from the state based on the district's average daily attendance (ADA).
- Expenditures for the educational portion of the NPS placement over the district's out-of-home allocation become the responsibility of the district.

- The SELPA expends educationally related mental health services funds to cover the district's room and board fees for students in a residential program and for any mental health costs for residential and day NPS programs.

Special education does not notify the Business Department about potential changes in the district's responsibility for NPS placements. There is a lack of communication between the Special Education and Business departments in developing the budget. Business first learns of additional costs when notified by the SELPA. Staff indicated that the district's financial responsibility for these programs has increased significantly, and the district received this information from the SELPA at the end of the quarter.

The table below compares the cost of the district's educational portion of NPS placements. The mental health costs of these placements are reviewed later in this report. In the past three years, the SELPA has included revenue limit funds in this calculation, but this was not included in the 2013-14 projections.

Comparing the Cost of the NPS Placements

	Annual Daily Attendance (ADA)	Total Cost of Placement	Revenue Limit	Out-of-Home Revenue	+/- District Additional Expenditure
2010-11	38.38	\$1,196,017	\$191,470	\$599,756	+ \$404,791
2011-12	38.31	\$1,202,151	\$189,137	\$536,819	+ \$476,195
2012-13	41.85	\$1,400,518	\$208,869	\$642,956	+\$548,693
2013-14 to date	43.69	\$1,493,996	0	\$642,956	+\$851,040

Source: *East Valley SELPA Documents Titled East Valley SELPA NPS Costs*

In 2013-14, the district will receive local control funding formula (LCFF) funds (the state's new funding model for K-12 school districts, which replaces the prior revenue limit funding model) for students in nonpublic school placements. An additional calculation using the 2012-13 revenue limit rate of \$4,990 and the 2013-14 projected ADA found that the district could receive an additional \$218,013 in LCFF funds to support these placements. This would reduce the district's additional expenditure from \$851,040 to \$633,027. This is \$84,334 more than the district's responsibility in 2012-13.

The SELPA has a process and procedure for referring a student for NPS placement, and staff indicated that in the past year, the district has developed its own procedure in this area. In prior years, students were referred for an NPS without a behavior support plan or consideration of all district resources. Staff also perceive that since the district began using the referral procedure, the number of district students in NPS placements has decreased; however, this is not the case.

Some staff members stated that the district's special education programs would not be appropriate for current NPS students. With the SELPA's assistance, the district is in the process of developing a pilot program for emotionally disturbed students, but this program would not take the place of an NPS, according to staff.

When developing alternative programs, it is important to ensure that students will receive a comparable program that would enable them to remain in or return to the district. A review of the more than 40 students in an NPS found that at least eight to 10 each in middle school and high school could be appropriately served in an intensive district program. These classes could also provide an appropriate placement for some students who enroll in the district with NPS on their IEPs or would be referred by the district for an NPS placement.

The highest cost of developing an alternative program is staffing. The district indicated that facilities, materials, and supplies are available for additional classes. District staff estimated that each class would require a teacher, two 6.5 hour aides, and a portion of a behavior specialist and counselor, but additional psychologists, speech therapists or adaptive physical education staff would not be needed.

Since these are new district programs, the district could also determine whether Medi-Cal and/or educationally related mental health services funds could be allocated to support these classes. Possible changes in the cost of transporting these students were not included in this estimate, and salaries were based on average salaries by title, including benefits, as provided by the district. Instructional assistants were calculated at 6.5 hours, rather than the district's current practice of 3.5 hours, to more closely align the program to an NPS program.

The average cost of a nonresidential NPS placement in 2012-13 was used for comparison purposes. Based on the data provided to FCMAT, this average was \$31,375. The NPS cost for 20 students would therefore be \$627,500.

Potential Cost and Savings of District Classes for Students in an NPS

Staff	Percentage FTE	Average salary with benefits
Teacher	2	\$187,303
Instructional Assistants	4 at 6.5 hours	\$99,064
Behavior Specialist	0.5	\$48,601
Counselor	0.8	\$95,422
District level support (may include a new position)	0.25	\$25,000
Total		\$455,390
Projected NPS Cost 20 students at \$31,375		\$627,500
Projected Savings for two classes of ten students each		\$172,110

Source for District Costs: *District Documents of Staff Salaries with Benefits*

Recommendations

The district should:

- Continue to include all revenues and expenditures when developing and monitoring the special education budget.
- Involve the Special Education Department in initial budget development. At least monthly meetings should be scheduled with the Business Department and Special Education to monitor all special education revenues and expenditures. At these meetings, Special Education should provide the Business Department with documentation that supports budget changes.

3. Continue the procedures of having the SELPA negotiate NPS contracts and monitor individual service agreements.
4. Monitor and adjust the budget accordingly when students enter or exit from an NPS placement.
5. Develop a process for tracking students who are referred to an NPS to determine the specific reasons for the referral and develop district programs and services to appropriately support those students in the district.
6. Develop classes for students who are in an NPS to return to the district and students who would be sent to an NPS to stay in the district.
7. Ensure that newly developed classes for students in NPS placements are sufficiently staffed for the level of students being served.

Nonpublic Agency (NPA)

Education Code requirements for nonpublic agencies (NPAs) are the same as for NPSs. Education Code 56365(a) requires an NPA to do following:

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

The district and SELPA provided FCMAT with NPA, independent contractor, and out-of-SELPA costs. In 2012-13, the total cost for these categories of services was \$398,553.

Students attending programs in another SELPA through an inter-SELPA agreement accounted for \$97,517 of this total. These placements reportedly occurred because the district did not have an appropriate program for these students.

A specialized service, auditory verbal therapy, accounted for \$21,095 of this total. The district recently hired staff with the skills necessary to assess and provide this type of therapy, potentially reducing the reliance on NPAs.

The remaining \$279,941 provided assessments or services required through mediations or resolution meetings.

Although the district processes contracts for some NPAs and independent contractors, the Business Department does not receive timely information about additional NPA or out-of-SELPA costs that need to be monitored. The SELPA processes some of these agreements, but the Business Department becomes aware of them only when notified by the SELPA.

Recommendations

The district should:

1. Compare the cost and program effectiveness of district speech therapists with contracted positions to determine whether the district should hire its own therapists or continue contracting.

2. Determine whether it is cost effective to develop programs and hire staff to provide the other services being received through an NPA or independent contractor.
3. Monitor the cost of NPAs, independent contractors, and out-of-SELPA students monthly to ensure that the district budget reflects changes in these services.

County Office of Education

The SELPA has a procedure for referring students to county office programs and, with the member districts and the county office, developed rates for these programs. According to staff, students are not referred to a county office program unless the services cannot be provided by the district.

Once a student is referred to and accepted by the county office, contact between the staff members of the two agencies is limited. One psychologist was recently assigned to attend the county office's triennial IEP meetings, but district staff do not generally attend annual IEP meetings.

Some district staff members perceive that the county office staff determines acceptance of a student in a county office program. When the county office staff determines that a student is not appropriately placed in its program, the student is returned to the district through the IEP process. District staff members believe they have no alternative to accepting a student who is returned from the county office program.

Some severely disabled students served by the county office integrate with the students on the regular education campus where the program is located. However, this is inconsistent and is most often prompted by the individual principal and the county office teacher(s).

A district must notify the local SELPA of its intent to begin operating classes for students in the county program by December 1, with an implementation date of July 1. A district can notify the SELPA that it will operate one class, several classes or all classes.

Before deciding whether to operate programs now run by the county office, districts should consider the many and varied services and items involved in operating special education programs for severely disabled students. They should also consider the fact that the fiscal impact of operating their own special education programs and services extends beyond salary and benefit costs. Program considerations are an integral part of any decision.

A district should first determine if the number of students is sufficient to warrant the district operating programs. In 2012-13, the district was billed for 133 students in county office special day classes (SDCs) at \$19,999 per student, according to SELPA data. This rate included the related services of speech, adaptive physical education and health. The following table separates the 2012-13 county program students by disability and grade levels so that the district can consider which groups, if any, it may consider when developing district classes. For example, the small number of hard-of-hearing/deaf students may not be sufficient, while the higher number of students with intellectual disabilities may be.

Rialto Unified students in County Office Classes by 2012-13 Grade Level and Disability

	Preschool	Grades K-5	Grades 6-8	Grades 9-12	Transition
Autism	8	15	9	12	1
Deaf/Hard of Hearing	4	4	0	1	0
Intellectual Disability	5	8	8	26	5
Multiply Disabled	5	7	5	4	0
Orthopedically Impaired	5	0	0	3	0
Other Health Impaired	0	1	0	1	0
Speech/Language	0	1	0	0	0
Visually Impaired	1	0	1	0	1
Totals	28	36	23	47	7

Source: SELPA Document Titled East Valley SELPA 2012/13 Fee for Service P-2 Final

*There were a total of 141 students during the school year, however, billing was based on 133 students.

A district should also consider other factors, including facilities, supervision, curriculum and assessments. Since the classes housed in the district include students from outside the district, it would need to consider whether to serve those students or have them transported elsewhere to continue receiving services from the county office. Because Rialto Unified students are served in county office classes housed in other districts, another factor is the impact on the county office of education of returning these students to the district.

The district also lacks a sufficient number of appropriately qualified staff to meet the needs of these students. In addition to qualified teachers of students with severe disabilities such as autism, intellectual disability, and emotional disturbance, staff for related services would be necessary. The district's speech therapy staff could not absorb the level of service required by this population without additional personnel. Other related service personnel would be needed such as physical and occupational therapists, adaptive physical education therapists, nursing and specialized services personnel. While the county office staff would have some transfer rights, current teachers may not wish to transfer. In some of the related service areas, county office staff would experience reduced caseloads, and the service could continue to be provided by those staff for a fee.

If the district considers operating these programs, it should ensure the process includes a high level of openness for all concerned, including the parents of district students in county office programs, the SELPA, the county office and its staff, and the district.

The district may need to consider hiring one additional part-time or full-time program specialist or coordinator depending on the number of students/classes the district will operate. That individual would need to have expertise in moderate to severe disabilities, including autism, multiple disabilities, behavior management, developmental delays, and medical fragility. Also needed would be knowledge in curriculum and program planning for these students.

The responsibilities of this staff member would include but not be limited to the following:

- Planning for program transition, organizing and/or providing training for district staff, conducting transfer IEP meetings for all students.
- Monitoring and implementing programs for the students transferred.
- Assisting with classroom behavioral issues and serving as liaison for any county office services.

The district will also need to increase the capacity of its general education teaching staff to work with these students. The better prepared all parties are, the more successful the program transfers will be.

In the following table, FCMAT completed a calculation for one class of 10 students. An individual calculation should be made for each class that the district will consider operating. Each level and type of class is unique, and therefore, the staff listed below may be greater than some classes would require, but insufficient for others. Staff costs are an average. This calculation used the Schools Services of California, Inc. recommended ratio of 10 students with one teacher and two aides. Additional support services were included, and instructional assistants were calculated for 6.5 hour positions. Changes in the cost of transporting these students were not included nor was the cost of any additional staff such as occupational therapists or administrative support since that depends on the specific classes that would be operated.

The cost of one class operated by the county office was based on the 2012-13 rate of \$19,999 per student or \$199,990 for a class of 10 students. The district would receive revenue limit (now LCFF) funding for those students. For purposes of this calculation, the 2012-13 revenue limit rate of \$4,990 per student was used for a total of \$49,900. The district could therefore realize an estimated savings of \$34,198 per class; however, this amount does not include transportation, occupational therapists or any additional district level staff.

District Staffing Costs in Comparison with the 2012-13 County SDC Billing Rate of \$19,999 per Student

Staff	Percentage FTE	Average Salary with Benefits
Teacher	1	\$93,651
Psychologist	0.1	\$12,335
Speech Therapist	0.2	\$29,616
Nurse	0.2	\$21,193
Adaptive Physical Education	0.1	\$9,365
Instructional Assistants	2 @6.5 hours	\$49,532
Staffing cost for district program		\$215,692
Additional Revenue Limit for 10 students at \$4,990/student		\$49,900
Balance for district program		\$165,792
Cost for 10 students in COE program at \$19,999 per student		\$199,990
Difference		-\$34,198

Source for District Costs: District Documents of Staff Salaries with Benefits (The total cost does not include transportation, occupational therapists, district level support, materials or assessment services.

Recommendations

The district should:

1. Continue using the referral process for county office programs.
2. Monitor the county IEPs and attend annual and triennial IEP meetings to increase the district's knowledge of the services required for these students.
3. Ensure that decisions for students in county office programs are made collaboratively with the district and county office.
4. Meet with the site principals who have county office classes on their sites to establish a process and expectations for those students to be integrated into the school.
5. Begin discussions with parents and staff if the transfer of programs is considered. If the district decides to establish programs for students in county office SDC classes, the following list will help with a successful transition.
 - a. Develop a listserv, which is a list of e-mail recipients who can share questions and answers regarding special education issues, to keep parents informed.
 - b. Schedule meetings with parents to keep them informed of the transfer and address their concerns. The first meeting should occur before the district submits the letter of request to the SELPA to prevent any perception that the district is proceeding without parent knowledge.
 - c. Work with the county office and SELPA, to determine exactly which students attend classes that are requested for transfer and the specific staff (teachers and aides) assigned to each program.
 - d. For each of these students, develop a matrix that includes his or her IEP goals, the amount of time for each student's related services, the service setting, any additional aide time, and whether transportation is required.
 - e. Determine which are not district students and decide whether the district will form a regionalized program, which could require a memorandum of understanding (MOU) with the sending districts, or the students will transfer to another county office class. In either case, include the parents of those students in the parent meetings and the listserv.
 - f. Finalize which facilities will be used for each class.
 - g. Review the cost of transporting the identified students to determine how they will be transported.
 - h. Complete an audit of all materials and equipment in each class.
 - i. Determine whether the district would want the materials and equipment to remain with the class.
 - j. Develop an agreement with the county office to maintain the materials and equipment, as appropriate.

- k. Review the SELPA staffing policy and state regulations for credentialed and classified staff. The district will need to determine the following:
 - Whether staff will retain their seniority date and classification.
 - Whether the position will be offered to the person currently assigned to the program, provided he or she is appropriately credentialed.
 - Whether the district will follow normal hiring procedures if that person does not apply for the position.
 - When the district will begin providing health benefits to transferred employees at the district rate.
- l. Meet with staff and affected county office employees and representatives to keep them informed of the transfer's progress and include them in planning.
- m. Determine the actual cost for each class based on all staffing information including psychologists and nurses, facilities, materials, equipment, maintenance, etc.
- n. Train site administrators and site staff in disability awareness.
- o. Train administrators in any areas of additional responsibility regarding transferred programs.
- p. Include the county office staff in these trainings as appropriate.
- q. Hold IEP meetings 30 to 45 days before transfer for each affected student to prevent any misunderstandings regarding the continuation of the student's IEP.

Due Process

Education Code 56501(a) states the following:

The parent or guardian and the public agency involved may initiate the due process hearing procedures prescribed by this chapter under any of the following circumstances:

- (1) There is a proposal to initiate or change the identification, assessment, or educational placement of the child or the provision of a free appropriate public education to the child.
- (2) There is a refusal to initiate or change the identification, assessment, or educational placement of the child or the provision of a free appropriate public education to the child.
- (3) The parent or guardian refuses to consent to an assessment of the child.
- (4) There is a disagreement between a parent or guardian and a local educational agency regarding the availability of a program appropriate for the child, including the question of financial responsibility, as specified in Section 300.148 of Title 34 of the Code of Federal Regulations.

In calculating the cost of due process, the district should consider the amount the district contributes to the SELPA for support with due process and the additional costs that may occur in settlement agreements.

In 2012-13, each SELPA member district contributed \$56.18 per student based on the 2011-12 December California Special Education Management Information System (CASEMIS) count. This fee provided the district with support in preventing and preparing for due process as well as the attorney fees incurred from a filing. Any student’s services that were agreed upon as a result of a filing were the responsibility of the district. In 2012-13, Rialto Unified contributed \$127,472.42 for SELPA support and \$70,597 for additional services.

The district had eight due process cases in 2011-12, 10 in 2012-13, and eight so far this year, including two initiated by the district. This number represents less than 1% of the total number of special education students in the district. Although the actual number of due process filings is low, staff indicated that the Special Education Department is frequently called on to attend IEP meetings that have advocates or attorneys present. The costs listed in the following table as reported by the district do not include staff time in preparing for and attending meetings.

Three-Year Comparison of Due Process Costs

Date	# Filings	Parent Attorney	SELPA Attorney	Services	Total
2011-12	8	\$5,000	\$54,988	\$5,060	\$65,048
2012-13	10	\$31,800	\$44,721	\$70,597	\$147,118
2013-14	8	0	0	\$35,100	\$35,100

Source: SELPA Documents Titled East Valley SELPA Claim Experience Reports

Although the documentation provided to FCMAT indicates the primary reason for requesting a due process hearing is placement, other underlying issues may be the actual reasons. These include the following:

- Parents do not trust that the district will agree to provide a student with the required services or the services on an IEP.
- The district special education staff is unable to monitor IEPs for compliance and ensure services are provided as written.
- Although the district has access to alternative dispute resolution through the SELPA, many parents do not know about it or trust it. The district’s special education staff have not had training in alternative dispute resolution or facilitated IEPs.
- Site administrators and special education teachers are rarely involved in mediations or settlement agreements and therefore have little understanding of why a settlement was necessary and how they could prevent procedural errors that can affect the outcome of a due process hearing.
- Special education teachers have not had sufficient training in writing compliant IEPs although this is available through the SELPA.
- Special education students are integrated to varying levels at the school sites. Some general education teachers are not given sufficient information regarding the special education students in their classes, and some site administrators may not be aware of or do not follow a student behavior plan.
- The district does not track due process filings or complaints. Developing systems to address problems is difficult without specific data regarding issues, sites, staff, etc.

- The Business Department is not provided with timely information on the potential cost of due process settlements so that the budget can be appropriately adjusted.

Recommendations

The district should:

1. Continue using the SELPA services for alternative dispute resolution and due process.
2. Develop a process to monitor IEPs for compliance and to ensure the services listed on them are provided to the student.
3. Encourage parents and staff to participate in alternative dispute resolution to develop trust and reduce the need for filing due process requests. Parents and staff should be trained in alternative dispute resolution so that they better understand the process.
4. Include site staff, as appropriate, in mediations and resolution meetings to ensure that sites understand how their role affects the process outcome.
5. Ensure that all special education staff have been trained in writing compliant IEPs.
6. Ensure that every general education teacher has information regarding special education students in his or her class, including the student’s goals, accommodations/modifications, disability strategies, and behavioral issues including behavior plans.
7. Ensure that every site administrator has information on all special education students at his or her site and in particular, information on behavior plans.
8. Develop a spreadsheet to include all pertinent areas of potential and actual due process filings, as well as any complaints that may be filed, so that costs can be tracked and issues determined and remedied.
9. Provide this spreadsheet to the Business Department at the proposed monthly meetings recommended in this report so the special education budget can be adjusted as needed.

Mental Health

The additional costs of mental health and residential services have transferred to school districts through Assembly Bill (AB) 114. On June 30, 2011, Assembly Bill 114, Chapter 43, Statutes of 2011 was signed into law. Under AB 114, several sections of chapter 26.5 of the California Government Code were amended or rendered inoperative, ending the state mandate on county mental health agencies to provide mental health services to disabled students. With the passage of AB 114, school districts are now solely responsible for ensuring that disabled students receive special education and related services, including some services previously arranged for or provided by county mental health.

The SELPA has a comprehensive plan to provide mental health services according to the statutory requirements. The SELPA hired staff to provide a therapeutic level of support, and the district staff indicated they were satisfied with these services. The plan includes a clear referral process to access SELPA support, which includes documentation of the services provided by the district before the referral.

The total amount of the mental health funds received by the SELPA are allocated to each district based on the formula agreed upon in the SELPA allocation plan. Nonpublic school costs for outpatient counseling, case management, day treatment, residential room and board, residential counseling, and visits/transportation are deducted from the district's total allocation. Regional program costs are also deducted. The remaining funds are distributed to the district to provide the required district-level support.

The district does not monitor the cost of the mental health portion of the residential placements, but receives this information from the SELPA. If there are additional costs from placements during the school year, the Business Department lacks the information necessary to make any budget adjustments until the end of each quarter.

Three-Year Comparison of Mental Health NPS and Regional Program Costs

Year	Outpatient	Case Management	Day Treatment	Room & Board	Residential counseling	Residential monitoring	Visits/travel	Regional Program	Total
2011-12	\$28,182	\$205	\$41,895	\$278,191	\$78,292	\$14,693	\$6,085	\$94,171	\$541,714
2012-13	\$6,842	\$137	\$26,494	\$54,593	\$54,589	0	0	\$181,189	\$323,844
2013-14	\$13,364	0	\$26,665	\$103,447	\$6,075	0	\$7,000	\$217,060	\$373,611

Source: SELPA Documents Titled East Valley SELPA NPS and Mental Health Cost Summaries Data for 2013-14 is projected

The district has determined that its portion of educationally related mental health services funds will support the behavior specialist, behavior analyst, behavior support aide, and counselor positions as well as a portion of the school psychologists and the psychologist intern. The following table compares the amount of educationally related mental health services funds the district has received and is projected to receive for the district mental health program to the NPS/regional program costs.

Disbursement of Mental Health Funds from 2011-12 with 2013-14 Projections

Year	Total Mental Health Revenue	Total NPS/Regional Program Costs	Balance for district programs
2011-12	\$1,623,829	\$541,714	\$1,082,115
2012-13	\$1,834,392	\$323,844	\$1,510,548
2013-14	\$1,833,764	\$373,611	\$1,460,153

Source: SELPA Documents Titled East Valley SELPA NPS and Mental Health Cost Summaries

Recommendation

The district should:

1. At the monthly meetings mentioned above, closely monitor the residential placements and mental health costs of all students in nonpublic schools and make budget adjustments to the amount the district will receive as changes occur.

Medi-Cal

Through the Medi-Cal local education agency (LEA) billing option, a district may submit claims to California Medi-Cal for covered services provided to eligible children enrolled in special education programs. This program is a way for school districts and/or county offices of education to receive federal funds to help pay for health-related special education and related services.

The district indicated that several changes were recently implemented regarding the district's participation in the program. The Medi-Cal billing agent was changed to Practi-Cal, and another district staff member was assigned to monitor revenue and expenditures. The district also recently included transportation, wheelchair buses, and behavior specialists in Medi-Cal billing.

Speech therapists, nurses, psychologists, health aides and other related service staff are authorized to provide data for Medi-Cal eligible students. The district is working closely with the billing agent to ensure that all appropriate staff are included in this process.

Speech therapists reportedly had difficulty accessing online billing this year. Because training in online submission has not been successful, the documentation to date is not complete; however, additional training is scheduled to correct the problem.

The district has a collaborative as required under the Medi-Cal local education agency billing option, and FCMAT reviewed documentation confirming the collaborative and its members. The documentation further confirmed that expenditures were for supplemental staff and material/supplies and therefore within Medi-Cal guidelines.

The budget documentation provided to FCMAT includes Medi-Cal carryover funds of approximately \$450,000. Staff stated that the district estimates revenue of approximately \$350,000 per year if all billing is completed as planned, and the budget provided indicated expenditures of \$459,000. A portion of the carryover would therefore be expended unless estimated revenue is increased. The collaborative is determining how much should be reserved in carryover and how much could still be expended.

Recommendations

The district should:

1. Ensure Medi-Cal revenue is maximized by having all appropriate staff submit billing information completely and timely.
2. Continue to ensure the revenue expended is for supplemental staff and materials that support the staff generating the Medi-Cal revenue.
3. Ensure carryover is reduced, but a sufficient amount remains to provide the current level of staffing and support.

Program Efficiency

District Infrastructure

Staff and administration interviewed by FCMAT expressed significant concerns regarding programmatic issues in special education and systemic issues throughout the district.

Special education staff indicated there is an absence of trust in the central office because of its significant lack of decision-making, accountability and guidance. Staff perceive that the central office is unwilling to put anything in writing and commit to a decision.

School site administrators lack the training and support necessary for successful special education programs. Administrators are not provided with any training in special education, and changes in program delivery are made with no preparation or training for administrators to support the change.

The district has a systemic lack of support for acquiring the expertise necessary for the Special Education Department to operate efficiently and effectively. The Special Education administration spends much of its time attending IEP meetings and dealing with compliance issues, leaving little time to focus on curriculum and instruction in special education classrooms. This is partially because of the limited number of special education administrative staff.

The district has an overall lack of capacity to provide adequate training/professional development for special education and site administrators, certificated and classified staff. This is a systemic issue that was mentioned by all representative staff interviewed. The district does not provide the support necessary for staff to effectively carry out its responsibilities. Because of the shortage in the number of special education administrators, classrooms receive few visits and little district support. The district recently began holding articulation meetings, but not all the staff attend; some arrive late, others leave early, and there are no consequences for nonattendance.

Designated instructional services (DIS) staff participate in little training. Continuing training is crucial to maintaining current best practices and enabling staff to practice in a legally defensible manner. Because the field of special education continually changes, providers such as speech language pathologists (SLP) and school psychologists should participate in continuous training. This improves their practice and helps the district be proactive and avoid unnecessary litigation.

The special education staff and school site staff are not trained in supporting special needs students with behavior problems. All staff needs training in this area. Students are frequently sent to the office because personnel do not know how to effectively deal with their behavior. None of the staff has been trained to de-escalate and deal with behavior problems and create safer classrooms. The Special Education Department is frequently reactive instead of proactive; however, all the departments and sites overwhelmingly stated that this is a systemic issue and not specific to special education.

Many districts and school sites across the United States address schoolwide behavior by adopting the Positive Behavioral Interventions and Supports (PBIS) framework. This is an evidence-based framework that provides schools with a three-tiered system of support that mirrors the three tiered Response to Intervention (RtI) model. The district has begun to implement this framework.

Staff indicated that instructional assistants are not appropriately trained to work with special needs students nor are they given time to meet with their assigned teachers and teams to debrief, solve problems, and receive feedback and support. Teachers need training on effectively using

their instructional assistants and providing constructive feedback and redirection when necessary. They also need assistance in developing their role as classroom instructional leaders.

The district has no master plan for training instructional assistants. The Special Education Department should assess the instructional assistants' performance and determine the training needed by staff. Coverage issues can make it difficult to release instructional assistants from the classroom, so online courses may be a viable option.

The SELPA offers training; however, staff is not always given the opportunity to attend, and requests are sometimes denied. The SELPA staff development calendar includes training that could benefit the Rialto Unified staff.

The Special Education Department is developing a procedural manual. This manual should outline the roles and responsibilities of the district and site administrators, teachers and designated instruction providers. It should include policies and procedures for referral, assessment, IEPs, placements, annual, and triennial reviews. This document should also be available online for all staff to access, including principals. It should be updated when laws change, and all staff should be directed to the online changes. Periodic advisories should be sent to all staff when issues arise that require additional explanation. Formal training should be provided on procedures when there are issues related to systemic compliance.

The Special Education Department does not send a representative to all the IEP meetings of students who are placed in county-office-operated regionalized programs. Annual IEPs are especially difficult for district representation to attend. One factor affecting attendance is that the district sometimes does not receive adequate notice of the IEPs from the county office. The school psychologist assigned to the nonpublic schools is responsible for attending county office IEPs; but cannot attend all of them because of his schedule. The district should consider dividing these IEPs between the administrative staff to ensure appropriate coverage.

Because the two systems used by the district to track student data are incompatible, they must be maintained manually, which can lead to increased human error and inefficiency. The districtwide system used is Synergy and the Special Education Department uses District Administration, which is the IEP software system implemented SELPA-wide. The district should develop a means to upload the information to allow compatibility between the two systems.

The district is partially implementing an RtI model and professional learning communities; however, they are implemented inconsistently districtwide and lack a master plan for guidance. Staff's knowledge of these models varies greatly throughout the district; some school sites are partially implementing both programs, while others are not implementing them at all. The district does not ensure that the sites have access to and are implementing state-approved supplemental intervention programs, which are a major component of a tiered model. The district also does not consistently use universal screening to accurately identify students and provide appropriate instruction. Universal screening and progress monitoring are essential for accessing academic and behavioral performance levels and evaluating the effectiveness of instruction and intervention.

The district should clearly define the research-based interventions it will support and provide staff with a means to implement, measure academic growth, and make educational decisions. Extensive training, data collection, monitoring, access to resources and materials, and consistency are necessary at the district level for all school sites to succeed.

General education should take the lead in implementing interventions. To ensure success, the district should join in a collective effort by all staff members, general and special education, to address students' academic and behavioral needs.

Many staff computers lack the capacity to support some of the programs needed to function efficiently. Staff access to technology is limited, and some technology is antiquated. This should be evaluated to improve the district's overall infrastructure.

Recommendations

The district should:

1. Continue to include the Special Education Department in the overall structure of the district, including representation on the cabinet.
2. Schedule monthly standing meetings between the Special Education, Human Resources and Business departments to discuss budgets, vacancies and staffing needs.
3. Develop a strategic plan for special education programs that can be used to improve instruction.
4. Provide staff with Pro-ACT training, which is specialized training for positive behavioral interventions, in dealing with student behavior and creating safer classrooms.
5. Continue implementation of the Positive Behavioral Interventions and Supports framework to address student behavior school/districtwide.
6. Provide training opportunities for designated instructional staff.
7. Provide regularly scheduled training and support for instructional assistants.
8. Consider offering online training to instructional assistants to decrease the amount of time they are away from the classroom.
9. Consider making time for classroom staff to meet (including instructional assistants) to debrief, plan, strategize and provide feedback on classroom functioning.
10. Train teachers to utilize instructional aides and provide them with direction/supervision.
11. Complete the procedural manual and make it available online for all staff.
12. Regularly update the manual on and notify staff when updates are made.
13. Train staff in the procedures to follow when systemic issues arise.
14. Ensure attendance at IEP meetings for students placed in county office programs by dividing the responsibility of attending meetings among administrative staff.

15. Consider developing a means to upload the information from the two student information systems (Synergy and the Web IEP program/DA) to allow compatibility between the two systems.
16. Develop a master plan for the implementation of RtI and professional learning communities.
17. Ensure all staff members are extensively trained in assessments, data analysis, programs, and research-based instructional practices and strategies.
18. Ensure all staff members can access scientifically researched-based instruction and interventions.
19. Ensure the staff has appropriate state-approved supplemental intervention programs for tiers II and III.
20. Ensure that universal screening tools are utilized.
21. Ensure a progress monitoring system is regularly implemented.
22. Evaluate technology and computer capacity throughout the district. A master plan should be developed to identify the greatest technological needs.
23. Develop a clearly defined collaboration/meeting schedule for Educational Services and Special Education staff that includes topics such as staffing, core instructional program implementation, training, and parent communication and involvement.
24. Consider transferring the special education program to the Educational Services Department to ensure greater alignment to core instructional programs and training.
25. Review the communication systems between special education and the principals. One way to accomplish this would be to send periodic advisories to all general and special education staff via e-mail quarterly regarding special education issues and interventions.

Organizational Structure and Assignments

The following table compares the district’s administrative and clerical staff with that of similarly sized districts. FCMAT found that Rialto Unified has fewer administrative and clerical staff in special education than comparable districts and is inadequately staffed. Efficiency has been compromised in a number of areas by a lack of staff in these areas. These include ineffective interdepartmental and school site communication, lack of support, increased expenditures, lack of goals and objectives, and a lack of appropriate training for special education and school site staff. Although it is a difficult fiscal time for the state’s public schools, the district should consider increasing the number of administrative and clerical staff. Otherwise, efficiency and program effectiveness will continue to be compromised.

The department’s administrative structure previously included program specialists, but these positions were eliminated. At least two coordinator positions should be added to provide the appropriate support and infrastructure and increase efficiency. The senior coordinator position should be reclassified as a director position, become a member of the cabinet, and report to the assistant superintendent of educational services.

An additional secretary III will be necessary to provide the needed infrastructure. At present, two secretaries are assigned to the school psychologists. Reassigning these two secretaries to the coordinators and redefining their duties would be more efficient.

Administrative Staff Comparison to Comparable Districts

Administrative Staff	Rialto Unified 26,485 ADA	Redlands Unified 21,379 ADA	Vista Unified 25,642 ADA	San Ramon Valley 30,738 ADA	Colton Joint 23,172 ADA
Student Services Sr. Director	.30				
Special Education Director		1.0	1.0	2.0	1.0
Program Specialist					2.0
Special Ed. Program Supervisors			5.0	5.5	
Special Ed. Principal		1.0			
Special Education Sr. Coordinator	1.0				
Special Education Coordinator	2.0	5.0			1.0
Teacher on Special Assignment		2.0			
Budget Analyst				1.0	
Office Supervisor					1.0
Administrative Assistant			1.0		1.0
Secretary III	1.0	1.0		2.0	
Secretary II				2.0	
Secretary I	2.0		3.0		
Office Secretary					7.0
Compliance Support Secretary		1.0			
CASEMIS Clerk		2.0			
Clerk III	2.0			1.0	
Clerk II	2.0	1.0			
Receptionist					1.0

Note: San Ramon Valley is a single-district SELPA

Job descriptions need to be updated. A review of these documents found that they do not reflect the roles and responsibilities of the Special Education Department staff. The department should work with the Human Resources Department to revise job descriptions so that they reflect current roles, responsibilities and duties.

If the district decides to take back severe programs from the county office, it would need additional administrative support.

Recommendations

The district should:

1. Reclassify the senior coordinator position to a director reporting to the assistant superintendent of educational services.
2. Add at least two coordinator positions to provide the appropriate support and infrastructure and increase efficiency
3. Increase clerical staff by adding a secretary III position.
4. Work with Human Resources to revise the job descriptions of special education clerical staff and administration.
5. Reassign the two secretaries from the school psychologists to the coordinators and redefine their duties.
6. Consider adding additional administrative support if the district decides to take back programs for severe students from the county office.

Staffing Assignment

The inconsistency between data from the Special Education and Human Resources departments is evident in a number of staff categories. These include mild to moderate teachers and instructional assistants, resource specialist program (RSP) teachers and instructional assistants and speech and language pathologists. However, some staff members are included on the Special Education caseload lists, but not on the list for the Human Resources Department. Some instructional assistants on the Special Education assignment chart are assigned to teachers that do not appear on the lists of Special Education caseloads or the Human Resources Department. Therefore, the number and names of special education staff are inaccurate, instructional assistant assignments cannot be tracked, and caseload data is erroneous. This also indicates that staff are not efficiently monitored.

The inconsistency between department staff lists and assignments indicates significant inefficiency. A system should be established to ensure that the lists are consistent in staff names and FTEs. This discrepancy recurs throughout special education programs except in moderate to severe program staffing, where the departments' data sources are more closely aligned.

The California Special Education Management Information System can generate reports on the identification and exit rates of special education students, trends in disability areas, high-incidence areas and data by grade, disability, and ethnicity. The administrative staff may lack the time to continuously monitor this data, but not doing so is an inefficient way to operate programs.

Although reports should be regularly disseminated and discussed with the special education and general education staffs, these documents are not frequently run, and special education data is not easily available through the district system. Some caseload information requested by FCMAT was manually gathered during the interview period because it did not exist beforehand. Reports run for some caseloads did not match the information provided during the study, and the class size data generated was inaccurate. None of the three different documents provided matched. Manually compiled data is often inaccurate or outdated, which leads to making decisions subjectively rather than objectively through the use of data. Gathering data manually is also time-consuming and inefficient.

Special education administration should create and monitor the following data monthly:

1. Caseloads and class sizes for all service providers and teachers using a database. Lists by school and providers should be developed, and this information provided to special education staff and school site principals at least monthly.
2. The number of instructional assistants and 1-to-1 instructional assistants, especially any new staff and their specific assignments.
3. All DIS caseloads.

This data should be provided monthly to the cabinet, special education staff and principals.

The district has established three levels of instructional assistants to support special education programs and students. Instructional assistant Is help classroom teachers with instructional activities, instructional assistant IIs work with students in special education RSP or SDC programs, and instructional assistant IIIs work with those who are in programs for the severely disabled or multiply handicapped.

Instructional assistants are part-time, most for three hours per day, and it is difficult to retain employees in these positions. Staff stated that as many as 50 positions can be vacant at any given time, sometimes remaining unfilled for extended periods, which creates a burden on programs and staff. Existing staff frequently fill the vacant positions, but the district must pay Public Employees' Retirement System (PERS) benefits if they remain for a certain number of days. A high number of vacancies also leads to frequent "bumping" and moving. This lack of consistency and turnover is inefficient for all the departments involved in the process and does not benefit students and programs. Further, the district lacks strong recruiting for vacant instructional assistant positions.

The Special Education Department does not monitor position control. A formal written proposal is not mandatory when requests are made for additional staff, including instructional assistants. The district should have a formal request process that includes justification from special education and clearance from the Finance and Business Department and the cabinet when a new position is requested or an existing position needs to be filled. An efficient and timely process is especially important for part-time positions because of the difficulty in filling them. The Human Resources Department does not work with local community colleges and universities to recruit instructional assistants. This is often an excellent way to solicit candidates.

Staff indicated that special education vacancies are not posted or filled in a timely manner, preventing the district from acquiring the best candidates. All districts recruit for positions in spring, and Rialto Unified misses this crucial window because of inefficiencies. When positions are not posted in a timely manner, vacancies exist for longer periods of time, making it necessary

to hire substitutes. These employees are typically not as effective as regular, trained classroom staff, nor are they usually familiar with the students, their goals, the curriculum, or class routines. It is not unusual for a substitute instructional assistant to have no previous experience with disabled students. As a result, the district must invest time to hire and train new staff in following classroom/school routines and dealing with individual students. Hiring full-time assistants may be more efficient and effective in classes for the autistic and emotionally disturbed because of the severity of student needs. Having numerous vacancies in these classes can be difficult for students and staff.

The district reportedly has no substitute pool for teachers and instructional assistants, which is inefficient. Substitutes should be trained in the skills and knowledge necessary to support the unique needs of students and classrooms. The following steps may help the district build a pool of skilled and well trained substitutes:

1. Determine the number of substitutes needed and recruit the appropriate amount to cover the average daily use of substitutes. Determining the average daily use can be accomplished by analyzing the annual substitute history.
2. Strengthen substitute screening, interviewing and selection.
3. Conduct thorough reference checks.
4. Maximize preparedness by developing strong and structured orientation and training. The orientation should include more than paperwork. It should teach substitutes about the different types of disabilities they will encounter in the special education classroom. Substitutes should be trained in classroom management, instructional skills, positive interactions, and expectations. They should be offered access to training in the district and SELPA.
5. Designate a site staff member to check on the substitutes during the day.
6. Develop a substitute teacher and instructional assistant guide.
7. Develop a substitute teacher folder and checklist.
8. Develop a substitute feedback form.

The district's recently established personnel services request process needs improvement. The process is utilized when new staff or replacements are requested to fill vacancies. The school sites responsible for generating these requests do not always use the appropriate budget coding. They also use the code of another department's (Special Education) budget, which can create problems.

Recommendations

The district should:

1. Ensure that special education administrators continually monitor caseloads, class sizes, data and trends.
2. Use data to drive staffing decisions, especially when any growth is needed or requested.

3. Provide this data monthly to the cabinet, special education staff, and principals.
4. Ensure the staff entering the data is trained to perform this task accurately and efficiently.
5. Create a database that aligns with the Human Resources Department system to track placement and movement instead of relying on manual entry.
6. Conduct a needs assessment with the special education staff to determine the reason for the high turnover among instructional assistants, and implement a system to reduce the amount of time necessary to fill vacant positions.
7. Establish a pool of substitute instructional assistants that can be used when staff is absent or vacancies exist and are in the process of being filled.
8. Follow the steps outlined in this report to create and maintain a pool of qualified substitutes. The district should improve its recruiting timeline and take the steps mentioned above to fill vacancies.

Staffing Ratios and Caseloads

FCMAT has significant concerns about the conflicting data that was provided to the team regarding staffing ratios and caseloads. This creates major efficiency issues.

The district operates special education programs and provides services for students with severe and nonsevere disabilities. One hundred and thirty-three of the district's special education students are served by county office regionalized programs.

The Rialto Unified Special Education Department has established district caseload ratios for its programs and has a memorandum of understanding (MOU) with its certificated bargaining unit for SDC class special education, which states the following:

Whereas the Rialto Education Association and Rialto Unified School District have engaged in discussions relative to the class sizes in Special Day Classes, the following has been agreed to for the 2013-2014 school year.

- A. Every effort shall be made to keep preschool and grades K-5 self-contained Special Education classes students at fifteen (15) students or below. In the event the number of students exceeds the number above, the parties (including the affected teacher) agree to discuss options and apply resolutions, including but not limited to, the following:
 1. Transferring students to another class or school site.
 2. Granting overtime hours instructional aides assigned in the classroom.
 3. Providing an additional instructional aide in the classroom.
 4. Opening another class at the site or another site when appropriate.

- B. Every effort shall be made to keep single special education periods at the Middle School at eighteen (18) or below and special education periods at the High School at twenty (20) or below and evenly distributed among SDC special education teachers. In the event the number of students exceeds the numbers above, the parties, (including the affected teacher) agree to discuss options and apply resolutions, including, but not limited to, the following:
 1. Mainstreaming students when appropriate.
 2. Revising the master schedule if possible.
 3. Opening another class at the site.
 4. Providing an additional instructional aide during the affected period.
 5. The parties agree to revisit the issue of special education class sizes after this MOU expires.

The district operates special day class (SDC) programs for students with mild to moderate disabilities and those with moderate to severe disabilities. Moderate to severe SDCs serve students who are developmentally delayed, multiply handicapped, emotionally disturbed, and autistic. The district also operates mild to moderate SDCs and RSPs.

Rialto Unified also provides itinerant services to district students. These services include adaptive physical education (APE), teachers for the visually impaired (VI) and teachers for the deaf and hard of hearing (DHH). Other providers, including two autism specialists, are provided by the SELPA for district use as needed.

The district employs a total of 328 instructional assistants, according to the data provided by the Special Education Department. Of the 328 instructional assistants listed in the special education documents, 50 are assigned 1-to-1. These will be covered in a separate section of this report. Most instructional assistants work three hours a day, and most SDC and RSP coverage consists of two to four, 3-hour instructional assistants working in the classroom throughout the school day depending on the specific classroom staffing. Creating some full-time positions for the intense classes such as autistic and emotionally disturbed programs may be more cost-effective and efficient.

Moderate to Severe Special Day Class Caseloads

The district MOU for the 2013-14 school year indicates maximum class sizes of 15 students per elementary school (K-5) SDC, 18 students per middle school, and 20 per high school SDC. The Education Code does not indicate maximum caseloads for special day classes; however, School Services of California, Inc. (SSC) has developed recommended caseload guidelines using data collected throughout the state. These guidelines are used across the state as the standard of practice for efficient special education staffing.

FCMAT used district data to analyze class and caseload size using statutory requirements for mandated services and statewide guidelines and to compare with district MOU maximums. The following table is organized by SDC type and shows a class size comparison with district MOU maximums and SSC guidelines. These caseload comparisons are divided by program, grade level clusters, number of students, and total classroom staffing, including instructional assistants and staff to student ratios.

Comparison of Moderate to Severe Classified and Certificated Staffing & Caseloads

Program	Teacher FTE	No. of Students	No. of Instructional Assistants*	RUSD Ratio	SSC Recommended Caseload	RUSD MOU Maximum	# 1:1 Teacher Assistants
Developmentally Delayed (Pre-K)	1	20	4	20 Students 4 Assistants	10-12 Students 2 Aides	NA-applies to K-12 only	1
Severe Multiple Disabilities Multi-Handicapped (K-5)	5	58	20	12 Students 4 Assistants	8-10 Students 2 Aides	15	5
Severe Multiple Disabilities Multihandicapped (Middle School)	3	44	12	15 Students 4 Assistants	8-10 Students 2 Aides	18	6
Severe Multiple Disabilities Multi-Handicapped (High School)	7	90	27	13 Students 4 Assistants	8-10 Students 2 Aides	20	7
Emotionally Disturbed (ED) (K-5)	2	18	8	9 Students 4 Assistants	8-10 Students 2 Aides	15	2
Emotionally Disturbed (ED) (Middle School)	2	19	8	10 Students 4 Assistants	8-10 Students 2 Aides	18	2
Emotionally Disturbed (ED) (High School)	3	31	12	10 Students 4 Assistants	8-10 Students 2 Aides	20	6
Autism Spectrum Disorders (K-5)	2	12	7	6 Students 4 Assistants	8 Students 2 Aides	15	0

Source: School Services of California, 2011, district documents

*SSC recommendations based on full-time equivalents of instructional assistants, district represents .5 part-time instructional assistants

FCMAT found that district programs are loaded at lower levels than the district MOU maximum in several instances. All moderate to severe SDCs have an average of four instructional assistants per classroom, and an additional 29 1-to-1 instructional assistants are assigned to students in moderate to severe classrooms. This increases the adult to student ratio per classroom. Most instructional assistants who work in moderate to severe district SDCs do so part-time for three hours per day. This means an average of four different instructional assistants work in a classroom each day. The School Services recommendation for two instructional aides is based on two full-time aides.

Although most of these assistants works three hours per day, approximately 20 of the 98 work more than three hours. Of these, most work 3.5 hours, and approximately six work four to six hours.

Functional Skills (Developmentally Delayed)-Preschool

The district MOU has no class size maximums for preschool. School Services recommends a caseload ratio of one teacher and two instructional assistants to a class of 10 to 12 students with moderate to severe developmental delay. The district's average caseload for teachers is higher than these guidelines, with an average of 20 students per teacher. The average number of instructional assistants is four per class, and one 1-to-1 position is assigned to students in these classes.

Severe Multiple Disabilities (Multihandicapped)

The elementary multihandicapped average class size is 12 students, which is lower than the district MOU maximum of 15 and more than the School Services recommended guideline. The middle school average class size is 15 students, which is less than the district MOU maximum of 18 students per class and more than the School Services guideline. The high school average class size is 13 students, which is significantly less than the district MOU maximum of 20 students per class and more than the School Services guideline.

Each elementary, middle and high school class has an average of four instructional assistants. The instructional aide staffing is aligned with the School Services recommendation.

Emotionally Disturbed

Elementary classes for the emotionally disturbed (ED) have an average of nine students, much lower than the district MOU maximum of 15 students and within the School Services guidelines. The middle school average number of students per class is 10, which is much lower than the district MOU maximum and within the guideline. The high school average number of students per class is 10, which is much lower than the district MOU maximum and within the SSC guideline.

Elementary, middle and high schools have an average of four instructional assistants per ED class. The four positions provide the equivalent of two full-time instructional assistant staff in the classroom throughout the school day. This may be an appropriate level of support depending on the intensity of student needs in the ED program. However, ED class also have additional 10 1-to-1 instructional assistants. If the district reduced the number of 1-to-1 positions by half, it would capture a cost savings of \$69,977.

Autism Spectrum Disorders

Elementary autism classes have an average of six students per class, much lower than the district MOU maximum of 15 students and below the School Services guideline of eight students. Autism classes have an average of four instructional assistants. According to the data provided to FCMAT, no 1-to-1 positions are assigned to autism program students, which is unusual.

Overall, moderate to severe average class sizes are below the district MOU maximum in all programs; however, most are within the School Services guidelines. The equivalent of two instructional assistants per classroom is also within these guidelines.

Creating some full-time instructional assistant positions for intense classes such as programs for the autistic and emotionally disturbed may be more efficient and effective. These classes cannot operate efficiently with frequent vacancies and a high number of substitutes.

Recommendations

The district should:

1. Consider reducing the number of 1-to-1 instructional assistants in multi-handicapped classes by at least half.
2. Consider reducing the number of 1-to-1 instructional assistants in ED classes by at least half.
3. Consider providing two full-time 1-to-1 instructional assistants in ED and autism SDCs instead of four part-time positions.

Mild to Moderate Special Day Class Caseloads

The district operates self-contained SDCs at the elementary, middle and high school level for students with mild to moderate disabilities. The district MOU maximum SDC sizes apply to these classes. The Education Code does not indicate maximum caseloads for mild to moderate SDCs; however, School Services has developed guidelines. The following table shows a summary of mild to moderate class sizes and compares them to MOU maximums and the School Services guidelines.

Mild to Moderate Special Day Class Size Ratios

Level	Total Teacher FTE	Total Students	Total Ratio	School Services Recommended Guideline	RUSD MOU Maximum
Pre-K	1	17 (two sessions)	1:9	NA	Applies to K-12 only
K-5	13	189	1:15	1:12	15
Middle School	11	175	1:16	1:12-15	18
High School	13	225	1:17	1:12-15	20

Source: School Services of California, 2011, district documents

The district mild to moderate SDC average class sizes for preschool is 17 students to one teacher. No district MOU maximums apply to preschool SDCs, but the preschool class size is higher than recommended by School Services.

Average size for mild to moderate elementary school classes (K-5) is 15, which is within the district MOU maximum and above the School Services guideline. The district has an average of 16 students per middle school mild to moderate SDC, which is within the district MOU maximum and slightly higher than the School Services guideline. High school mild to moderate SDCs have an average of 17 students, which is less than the district MOU maximum and higher than the School Services guideline.

These guidelines indicate one or two instructional assistants for each preschool mild to moderate SDC with 10 to 12 students. School Services also recommends one instructional assistant per elementary class with 12 students or middle/high school class with 12 to 15 students. The following summarizes the instructional assistants for mild to moderate SDCs.

Mild to Moderate Special Day Class Instructional Assistant (IA) Ratios

Level	# Mild to Moderate Classes	Number of IAs	Average IAs per class	I:I IAs
Preschool	1	3	3	2
K-12	37	79	2	16

Source: School Services of California, 2011, district documents

Preschool classes have an average of three instructional assistants, with an average of two per mild to moderate elementary, middle, and high school SDC. In addition 18 1-to-1 positions are assigned to individual students in mild to moderate SDCs, a high number that costs the district approximately \$251,919 a year. The district could save approximately \$125,959 by reducing that number by half.

The instructional assistant assignment list provided to FCMAT indicates the program and teacher to which each position is assigned. Instructional assistants are assigned to eight teachers who are not on the special education caseload list or the Human Resources Department's staff list. Because of this, it was not possible to accurately divide instructional assistant ratios by grade level clusters, so they were calculated as an overall K-12 ratio. Not knowing instructional assistant assignments is inefficient and can be costly to the district.

The Special Education Department does not maintain up-to-date and accurate class loadings and instructional assistant assignments, nor does it regularly communicate with Human Resources. The Human Resources list includes vacancies, and the special education lists do not; the district should have consistency in the data that is gathered and used for staffing decisions. Because the data provided to FCMAT for the mild to moderate SDC assignments is unreliable, this analysis provides only an estimate of instructional assistant staffing in this area. This is an area of inefficiency that the district should closely examine and develop systems and processes for monitoring staff assignments and caseloads.

Recommendations

The district should:

1. Develop a system for monitoring and tracking mild to moderate SDC caseloads including teachers, number of students per class, and instructional assistants.

2. Regularly monitor teacher assignments, class sizes and instructional assistants and align with the Human Resources Department data.
3. Evaluate the need for 18 1-to-1 instructional assistants and consider reducing the number by half if appropriate.

Resource Specialist Programs (RSP)

Education Code 56362 indicates that the maximum caseload for resource specialist teachers is 28 students. District data, summarized in the following table, indicates that a total of 19 FTE RSP teachers work at the elementary school level, with an average of 19 students per teacher. This caseload ratio is significantly lower than the maximum amount allowed by Education Code. District middle and high school RSP teachers maintain average caseloads of 26 students, which is slightly less than the statutory maximum caseload of 28. The overall district caseload ratio is one teacher to 23 students and falls below the Education Code maximum.

Comparison of Resource Specialist Caseloads to Education Code Caseload Guidelines. (E.C. 56362)

Level	Total Teacher FTE	Total Students	Total Ratio	Education Code Guideline Ratio (FTE to Student Caseload)	Total Instructional Assistants
Elementary	19	370	1:19	1:28	
Middle/High	26	678	1:26	1:28	
Total	45	1,048	1:23	1:28	102

Source: California Education Code 56362, district documents

If the district increased RSP caseloads to the Education Code maximum, it could reduce the number of teacher FTEs from to 45 to 37, for a total savings of eight FTE. Because the average cost of RSP teacher salary and benefits is \$93,651 this would save the district \$749,208. Because of logistics, student needs, and the unique programming structure at the middle and high schools, it may not be feasible to make a reduction of this size while maintaining appropriate course offerings and class sizes. However, the district should make a reduction at the elementary school level, where caseloads are significantly below the Education Code maximum. One teacher should be assigned to two sites to reduce the number needed.

FCMAT compared the resource specialist program teacher caseload data with the list of resource teachers provided by the Human Resources Department and found it did not match. Three teachers on the Special Education caseload data did not appear on the Human Resources teacher list, and approximately four teachers on the latter list were not on the former list and have unknown caseload amounts. As a result, these four teachers were not included in the caseload ratio calculation. This suggests that the caseload ratios are inaccurate and could be lower or higher than indicated in the above table. The Special Education and Human Resources departments should regularly communicate all data sources to ensure that staffing lists can be aligned. These discrepancies indicate a significant area of inefficiency in the special education program that needs to be closely examined and addressed.

A total of 102 instructional assistants are assigned to the resource program, according to data provided to FCMAT. Two are assigned as 1-to-1 aides. Almost all the resource teachers are assigned two instructional aides per day, and most work part-time. A review of instructional aide

assignments found that 24 are listed as assigned to teachers who are not on the Special Education resource specialist caseload list, and 16 are assigned to teachers who are not on the Human Resources Department's list.

The inconsistency between the data sources provided by the district indicates that instructional assistant assignments, teacher assignments, and caseloads are monitored inefficiently. In addition, the number of instructional assistants assigned to the resource program is significantly higher than recommended by School Services guidelines.

The district spends approximately \$946,248 per year in salaries and benefits for 102 part-time instructional assistants assigned to the resource specialist program. The Education Code requires only 80% of the resource specialists to have an instructional aide. The district provides 100% of the RSP teachers with aides. By implementing this requirement, the district could reduce the instructional aide support for RSP programs by 18 positions, which would yield an approximate savings of \$251,919.

Recommendations

The district should:

1. Develop a system for monitoring and tracking RSP teachers, caseloads and instructional assistant assignments in the resource program and regularly monitor this data.
2. Consider reducing the number of RSP teacher FTEs so it more closely aligns with the Education Code, particularly at the elementary level.
3. Consider reducing the number of instructional assistants assigned to RSP teachers by 18 positions.

Designated Instructional Services (DIS)

The Special Education Department does not maintain separate caseload lists for monitoring all designated instructional services (DIS) caseloads weekly to monthly. The department can process these lists through a computerized system; however, up-to-date individual lists should be maintained and updated weekly. There are discrepancies between the computerized reports and the caseload lists.

The district has one behavior analyst and a behavior aide, but no behavior team. The teachers struggle with the behavioral needs of the students, and the suspension rate is reportedly high. A behavior team can support crisis intervention and ensure that behavior support plans are developed and monitored. The district needs two additional behavior specialists and two instructional assistants who are highly trained in behavior management to provide support districtwide. Mental health funds may be used to fund these positions.

District caseloads for speech language pathologists (SLPs) were compared to the recommended Education Code maximums (EC 56363.3[K-12] and 56441.7 [ages three to five]) and are outlined in the following table). Comparisons to Education Code maximums were made for kindergarten through 12th grade and preschool since there are different maximums for these two grade level groups.

Speech Language Pathologist Caseload Comparison

Provider	Total Caseload Ratio (Total FTE to Total Student Caseload)	District Average Caseload Ratio	Ed. Code Guideline Ratio (FTE to Student Caseload)
Speech-Language Pathologist (SLP) K-12	14.75:777	1:53	1:55
SLP Preschool	2:82	1:41	1:40

Source: Ed Code 56563.3 for ages five to 22 and 56441.7 for ages three to five, district documents.

The Education Code maximum for SLPs serving K-12 students is 55. District data indicates that it has 14.75 FTE SLPs serving K-12, and two are contracted through an NPA. The district caseload average for SLPs is 53 and falls within the Education Code maximum. The Education Code maximum caseload for SLPs serving preschool students is 40, and the average district caseload is 41, consistent with the Education Code maximum.

Speech and language assignments are unevenly distributed. Caseloads should be regularly monitored and leveled so that the distribution of responsibilities is spread evenly across SLPs.

The staff reported that caseloads are sometimes not leveled. Leveling is a method that uses a chart to assign each student receiving speech and language services with a factor of 1, 2, or 3, depending on the level of services provided, type of disability, and grade level. The factors are totaled to determine caseload sizes. Each speech and language therapist is assigned a proportionate share of the total services provided.

The average salary and benefits for an SLP is \$90,157, which is not higher than any other district in the area. The district does not pay less to contract with an NPA for SLP services. The district pays \$85 per hour for NPA SLP services, however, it pays on average \$70 per hour to its district speech therapists. Therefore, it would not be cost-efficient to use contracted services instead of hiring to fill positions.

The following table indicates the district school psychologist staffing ratio compared to the statewide average established by California Education Facts (CalEdFacts). The Education Code has no guideline for determining school psychologist staffing ratios. The standard of one school psychologist to 1,466 K-12 students was published in California Education Facts (CalEdFacts) for 2010-11. According to district data, school psychologist caseloads average one school psychologist to 1,765 students.

School Psychologist Caseload Comparison

Provider	FTEs by Category	District Enrollment	District Ratio	CalEdFacts Staffing Ratio
School Psychologists	15	26,485	1: 1,765	1:1,466

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

The 15 district school psychologists are on a separate management salary schedule from other special education providers. All school psychologists work 1 FTE. Half their salary is paid from special education and the other half from educationally related mental health services and the general fund.

Each psychologist is assigned to various school sites, where they maintain a worksite office. In addition, all school psychologists are provided with a desk and workspace at a central office. Providing each school psychologists with another office/work space in a district centralized location is inefficient since the school sites are not spread across an unusually large geographic area. Instead, one workstation could be set up at the central office and shared by the psychologists on an as-needed basis. Test scoring programs and other needed materials could be located at a shared workstation.

Two secretaries are assigned to the school psychologists. The psychologists' work and role typically do not require the support of a secretary except when ordering testing materials and supplies, and this would not require two full-time secretaries. Utilizing the secretaries to support the special education coordinators would be a more appropriate use of their time.

The following indicates the district's caseload ratios of DIS providers. The district provides APE, VI teachers, and DHH teachers, and the SELPA provides occupational therapists, physical therapists and two autism specialists.

Designated Instructional Service (DIS) Provider Caseload Comparison

Provider	District Total Caseload Ratio (Total FTE to Total Student Caseload)	District Average Caseload Ratio	SSC Guideline Ratio (FTE to Student Caseload)
Adaptive Physical Education (APE)	5:165	1:33	1:45-55
Visually Impaired Itinerant (VI)	1:7	1:7	1:10-30
Deaf & Hard of Hearing Itinerant	1:14	1:14	1:20-30
Deaf & Hard of Hearing Itinerant-NPA	.30:4	1:13	1:20-30

Source: School Services of California, 2011, district documents

The Education Code does not include maximum caseloads for the DIS providers listed in the above table; however, School Services guidelines are used as the standard of practice for efficient special education staffing.

School Services' recommended number of APE teachers to students is 45-55, and district APE teachers have a caseload ratio of one teacher to 33 students, much lower than the recommended number. The district could reduce the number of APE teachers to 3 FTEs instead of 5 by aligning with the School Services recommended caseload of 55. Based on the district average salary of \$86,931 for APE teachers, this would result in a cost savings of approximately \$173,862.

APE teachers have from 30 minutes to three hours each day for office/assessment. One teacher has three hours of office/assessment time built into his schedule three days of the week, and another teacher has a one-hour prep period daily in addition to office/assessment time. Two APE teachers have site time with no caseload students scheduled each day. Some APE teacher schedules also indicate that their workday starts at 6:30 a.m. and 7 a.m. on school sites where school does not begin until 7:25 a.m. or later. Their day is scheduled to end at 1:30 p.m. or 2 p.m., and students at most sites do not finish their school day until 1:45 p.m. at the earliest and later for middle and high schools.

It is unclear how these teachers can attend after-school IEP meetings when staff workdays are scheduled to end as early as 1:30 p.m. or 2 p.m. Some IEP meetings can take place during the school day; however, it is often necessary to hold them after school. This is an inefficient and ineffective use of time and creates fiscal inefficiencies. The district should evaluate this area and take steps to increase efficiency in staffing and provision of services and scheduling.

One VI teacher has a caseload of seven students, and the School Services guideline is 10-30 students per teacher.

One DHH teacher has a caseload of 14 students compared to the School Services guideline of 20-30 students. Four district students require auditory verbal therapy (AVT), but the closest location to obtain this service is Long Beach, which would require a long travel time for one and half days a week and be costly for the district. Instead, the district contracts with a qualified NPA SLP for .30 FTEs at a cost of \$95 per hour. This is more cost effective and eliminates travel time for district staff and students.

Recommendations

The district should:

1. Regularly maintain and monitor current and accurate caseload lists.
2. Consider creating a behavior team.
3. Consider hiring NPA SLPs as attrition occurs with the SLP staff.
4. Ensure SLP caseloads are leveled.
5. Consider utilizing one shared school psychologist workstation at the central office instead of providing each psychologist with a second workspace.
6. Consider reducing the number of APE teachers to align with the School Services caseload ratio guidelines.
7. Consider evaluating APE teachers' schedules so that they more closely align with school site schedules. The district should ensure these teachers spend adequate time at school sites where they have students on their caseloads.
8. Consider reorganizing the APE teachers' schedules to omit the school sites where they have no students on their caseloads.
9. Consider decreasing the amount of time each day that some APE teachers spend in the office, and increasing their time with students.

1-to-1 Instructional Assistants

FCMAT was unable to determine the exact number of district 1-to-1 instructional assistants, but the cost for these employees was approximately \$699,775 this fiscal year based on the provided information.

Throughout California the number of districts utilizing instructional assistants, 1-to-1 and special circumstance instructional assistants has significantly increased over the past few years. This has affected special education budgets and contributions from the unrestricted general fund; especially in situations where the services aren't warranted or monitored and create a sense of dependence. One strategy in determining whether these services are appropriate is to implement a policy, procedures, and guidelines while strictly monitoring these services to prevent them from being provided unnecessarily.

Many districts use the term special circumstance instructional aides instead of 1-to-1 assistants to indicate that an assignment is temporary. Transitioning or "fading" these services encourages student independence.

The district has an informal procedure of requesting additional instructional assistants; however, some staff indicated that these guidelines are not always followed, and a few staff were unaware of them. The Special Education Department does not evaluate the ongoing need for instructional aides assigned to the classrooms or to specific students. When an IEP team determines that additional support is warranted, the team does not include a fading plan for these services. Lack of effective departmental and district communication plays a large role in these inconsistencies.

The district has not implemented an articulated system of assigning and fading 1-to-1 instructional assistants. The lack of fully implemented policy and procedures increases the potential for adversarial IEPs because no structure exists to guide decisions when a 1-to-1 instructional assistant is requested or recommended. The IEP team does not include a fading or exit plan for services when it determines that placement of a 1-to-1 instructional assistant is appropriate. Because policy and procedures are followed inconsistently, teachers are unclear on when they can decline a request. Once a 1-to-1 aide is assigned, the Special Education Department does not re-evaluate to determine if the position is still necessary for the student to benefit from education.

The Special Education Department provides no training or routine guidance for 1-to-1 assistants. The department should determine the 1-to-1 assistants' performance and the training needed by the staff. The district also does not have a master plan for training 1-to-1 assistants.

The department has not assigned a specific staff member to review aide use, analyze student needs, and monitor 1-to-1 assignments. Policies and procedures should clearly define who is responsible for these tasks. The Special Education Department has no database that aligns with the Human Resources Department to track the placement and movement of instructional assistants. Instead, this is accomplished manually, which impedes efficiency. When a 1-to-1 position becomes vacant or a new position is created, it frequently is filled with a part-time instructional assistant. This creates major vacancy issues for instructional assistants and hinders the instructional program.

Strictly following policies and procedures provides an opportunity to clearly define the role of the special education director, special education staff, and school site administrators. Guidelines can assist district staff when they are challenged by parents and advocates who request these services and promote a focus on students at IEP meetings. The development and implementation of guidelines should be followed by extensive training. Administrators, general and special education staff should attend mandatory training on using the guidelines.

Once policy and procedures are implemented, a review of all instructional assistant placements should be conducted to utilize these resources more effectively.

Guidelines assist staff with the following decisions:

1. Determining the need for additional 1-to-1 assistants.
2. Determining alternatives to 1-to-1 instructional assistants.
3. Evaluating the continuing need for these services.
4. Determining when it is appropriate to add additional hours to an existing instructional assistant's contract.

Policy and procedure should include the following components:

1. A determination of the appropriateness of assigning a 1-to-1 instructional assistant to a classroom/student.

2. Determination of the need for 1-to-1 instructional assistant assignments within a step-by-step structured process.
3. Alternatives to using 1-to-1 instructional assistants.
4. A determination of whether existing resources are being utilized.
5. Incorporation of a fading plan.
6. Evaluation of the continuing need for 1-to-1 instructional assistants.
7. Determination of when it is appropriate to add hours to an existing instructional assistants' schedule.

Recommendations

The district should:

1. Develop and strictly follow policy and procedures for the use of special circumstance instructional assistants rather than 1-to-1 positions along with general instructional assistant guidelines.
2. Develop and strictly follow policy and procedures to assist with assigning, supporting, fading, and dismissing 1-to-1 instructional assistant services.
3. Develop policy and procedures to include the establishment of monitoring and fading plans at IEP meetings. This is important to promote independence of the students and to reduce dependence. It is also necessary for efficiency purposes.
4. Provide mandatory training to special education staff and school site administrators on the policy and procedure for determining the need for 1-to-1 instructional assistants (special circumstance instructional assistants).
5. Closely monitor the assignment of 1-to-1 instructional assistants and the placement of the student to which they are assigned.
6. Evaluate the continuing need for 1-to-1 instructional assistants, and identify the specific administrator to analyze 1-to-1 use and student needs. The roles of the special education director, special education staff, and school site staff should be clearly defined.
7. Develop a master plan to address districtwide 1-to-1 assistant training needs.
8. Provide extensive training and routine guidance to the 1-to-1 assistants.
9. Determine whether online courses are an efficient way to train 1-to-1 assistants.
10. Ensure that the placement of 1-to-1 instructional assistants is appropriate for the student and staff.
11. Ensure that the Special Ed and Human Resources staffing databases for 1-to-1 instructional assistants match.

Program Effectiveness

State Assessments

FCMAT reviewed the overall student academic achievement for the special education subgroup at Rialto Unified based on state achievement data from the California Department of Education Standardized Testing and Reporting (STAR) system. These data include results from students in grades two through 11 on the following subtests:

- California Standards Test (CST)
- California Modified Assessment (CMA)
- California Alternate Performance Assessment (CAPA)
- California High School Exit Exam (CAHSEE)
- California English Language Development Test

An overview of these subtests can be found at the following Web address on the California Department of Education website:

<http://www.cde.ca.gov/ta/tg/sr/cefstar.asp>

California Standards Test and California Modified Assessment

The overall academic achievement for the district's disabled students from 2011 to 2013 is significantly below county and state averages in the percentage who were proficient in the English language arts (ELA) and mathematics subtests. Based on the Title I adequately yearly progress proficiency targets in ELA and mathematics, the disabled students subgroup had growth of approximately 2%, missing the federal targets by 25% (2011), 40% (2012), and 60% (2013). Student achievement was slightly higher on the California Modified Exam than the California Standards Test. A significant gap (greater than 15%) exists between general education students and the special education student subgroup in English language arts and math. While this type of gap is common in districts throughout the state, there is also a significant difference between the state and district average for the special education subgroup in English language arts and math.

Student Achievement Results in Grades 2-11 (CST & CMA) % Proficient or Above

Year	% All District		% Sp. Ed. Dist.		% Sp. Ed. State	
	ELA	Math	ELA	Math	ELA	Math
2011	45.6	47.8	25.1	25.6	34.6	36.6
2012	47.2	48.8	27.6	27.6	35.7	37.2
2013	45.9	49.6	27.4	27.4	35.1	37.3

Source: California Department of Education DataQuest - <http://data1.cde.ca.gov/dataquest/>

California Alternate Performance Assessment

From 2011 to 2013, the overall academic achievement of the district's disabled students on the California Alternate Performance Assessment varied as compared to the state averages in the percentage of those students who were proficient in English language arts. Specifically, the district level II (grade 2-3) student scores ranged from 15% below and 15% above the state average. The district Level III (grade 4-5) students scored between 5% and 10% below the state average over three years. The district Level IV (grade 6-8) students scores ranged from 18% below and 2% above the state average. The district Level V (grade 9-11) students scored between 8% below and 14% above the state average in the percentage of those students who were proficient over three years.

The overall academic achievement in mathematics over a three-year period also varied as compared to the state average. Specifically, district level II students scored between 14% below and 2% above the state average over three years, and level III scored between 20% below and equal to the state average over the same time period. Level IV showed improved achievement, scoring 18% above or within 3% of the state average. Level V was similar to level IV, showing between 5% below and 15% above the state average in the percentage of those who were proficient over three years.

Student Achievement Results in Grades 2-11 (CAPA) % Proficient or Above, English Language Arts

Year	Level II Grade 2-3		Level III Grade 4-5		Level VI Grade 6-8		Level V Grade 9-11	
	Dist.	State	Dist.	State	Dist.	State	Dist.	State
2011	70	85	74	84	80	78	70	78
2012	95	80	77	82	52	70	84	79
2013	83	84	79	86	63	75	95	81

Student Achievement Results in Grades 2-11 (CAPA) % Proficient or Above, Mathematics

Year	Level II		Level III		Level IV		Level V	
2011	52	63	52	72	83	65	63	68
2012	50	64	70	70	63	66	71	69
2013	67	65	55	65	69	64	86	71

Source: California Department of Education DataQuest - <http://data1.cde.ca.gov/dataquest/>

Academic Performance Index

The district overall Academic Performance Index (API) over a three-year period had minimal growth, showing a five-point increase, 746 (2011) to 751 (2013). The API for the special education subgroup increased by 11 points (547 to 558) in the same period. The discrepancy in API scores between the overall district API and special education subgroup API is 193 points (751 vs. 558). When compared to the state API for the special education subgroup, the district is on average 51.3 points below (48 points in 2011, 49 points in 2012, and 57 points in 2013).

Academic Performance Index – API Growth

Year	Overall District	Sp. Ed.	
		Dist.	State
2011	746	547	595
2012	750	556	605
2013	751	558	615

Source: California Department of Education DataQuest - <http://data1.cde.ca.gov/dataquest/>

California High School Exit Exam

Another component of the STAR system is tracking the achievement of high school students on the CAHSEE. Similar to the achievement results for adequate yearly progress and the API, the district's student achievement for the special education subgroup is well below state and county averages. District pass rates for the special education subgroup in English language arts and mathematics over a two-year span (2012-13) was below state averages for the special education subgroup by approximately 19% and below county averages by 14% in English language arts and 5% in mathematics. However, Education Code Section 60852.3 allows for disabled students with an IEP or 504 plan to be exempt from meeting the exam requirement to receive a diploma. An overview of the CAHSEE exemption can be found on the following website:

<http://www.cde.ca.gov/ta/tg/hs/cahseefaqexempt.asp>

California High School Exit Exam (CAHSEE) Combined

Sp. Ed. Population Pass Rate

Year	% State		% County		% District	
	ELA	Math	ELA	Math	ELA	Math
2012	39	41	34	35	20	33
2013	40	42	37	38	24	32

Source: California Department of Education DataQuest - <http://data1.cde.ca.gov/dataquest/>

California English Language Development Test

A third component of the STAR assessment system is English language development. The California English Language Development Test is designed to monitor the achievement of English language learners in acquiring English proficiency. District achievement for the special education subgroup over a three-year period was significantly disproportionate to all English learners districtwide. Most special education English learners scored basic or early intermediate, while most English learners who are not identified for special education services scored intermediate or early advanced. This data suggests that English learners who receive special education services are making significantly less progress in acquiring English as a second language than their general education peers. Further analysis is warranted to determine if English learners are appropriately identified for special education services because of their language deficits.

California English Language Development Test (CELDT) Achievement (Initial and Annual) by Level

Year	% Not Sp. Ed. ELs					% Sp. Ed. ELs				
	A	EA	I	EI	B	A	EA	I	EI	B
2010	12	33	33	13	9	3	12	31	31	23
2011	7	29	37	15	11	1	10	31	27	31
2012	7	32	37	15	9	2	12	32	28	25

Source: California Department of Education DataQuest - <http://data1.cde.ca.gov/dataquest/>

Program Improvement Status

As a result of the overall academic performance and that of the special education subgroup, the district is in program improvement status, year 3, based on state and federal accountability requirements for Title I. In addition to district program improvement status, 16 schools are in various levels of program improvement. The special education subgroup contributed to this status at each school.

This data indicates that student achievement for the special education subgroup on state assessments is of significant concern. State targets were missed by a wide margin and also fell significantly below the achievement of special education subgroups in the state's surrounding districts.

Assembly Bill 484, signed into law on October 2, 2013, replaces the STAR assessment system with the California Measurement of Academic Performance and Progress assessment system (information is available at the following website):

<http://www.cde.ca.gov/ta/tg/sa/ab484qa.asp>

This new system, which takes effect on January 1, 2014, proposes a radically new approach to state assessments that includes Computer Adaptive Tests and performance tasks. The introduction of the Usability, Accessibility, and Accommodations Guidelines; developed to accompany the new Smarter Balanced Assessment Consortium state assessments; may be of greatest importance to the special education subgroup. Starting in spring 2014, disabled students (excluding those taking the California Alternate Performance Assessment) will be required to take the same assessments as those in general education. These new assessments will have accessibility and accommodation features. More information is available on the Support for Under-Represented page of the consortium website.

District Assessments

The overall student academic achievement for the special education subgroup was also reviewed based on district benchmark assessments in grades 2 to 5, 6, 8, and 10. While the district uses the Dynamic Indicators of Basic Early Literacy Skills assessment as a benchmark exam for kindergarten and first grade, insufficient data was available for the special education subgroup. As a result, this report will not include an analysis of student achievement for special education students in kindergarten and first grade. Additionally, no data was available for kindergarten and first grade in mathematics, therefore, a comparative analysis could not be developed. The lack of achievement data for these two grade levels creates a significant inequity between general education and special education students. Gathering and analyzing student progress in foundational literacy skills and foundational mathematics is a key aspect of an effective Response to

Instruction and Intervention (RtI²) system that could reduce overidentification for special education by addressing student needs at the lowest level of intervention (Tier 1) in the least restrictive environment. The hallmark of a balanced instructional program is to have an ongoing formative and summative assessment system to monitor student academic growth to make adjustments in core instructional delivery as well as to target intervention based on student need. RtI is cited in the reauthorization of the Individuals with Disabilities Education Act (IDEA) of 2004 related to the determination of a specific learning disability and in 34 Code of Federal Regulations Sections 300.307, 300.309, and 300.311. The guide developed by the California Department of Education entitled "Determining Specific Learning Disability Eligibility Using Response to Instruction and Intervention (RtI²)" is available at the following Web address:

www.cde.ca.gov/sp/se/sr/documents/sldeligibiltyrti2.doc

The district benchmark assessments used for grades 2, 3, 4, and 5 are based on an end-of-year assessment. The district uses the Illuminate Data & Assessment database to manage benchmark assessments and analyze achievement data. This end-of-year assessment assesses the same standards during the fall administration (Blueprint Benchmark Form A) and the spring administration (Blueprint Benchmark 2). The overall student population in each grade level (2, 3, 4, and 5) shows significantly greater improvement than the special education subgroup in the total percentage of students scoring at the mastery level in English language arts (as shown in the following table). The special education subgroup in grades 2, 4, and 5 showed minimal increase in this area. Except for grade 3, the achievement gap between overall and special education student achievement on the English language arts assessments is significant.

District Blueprint Benchmark Assessments – Elementary English Language Arts

Grade	All Students ELA Benchmark 1 (% Mastered)	All Students ELA Benchmark 2 (% Mastered)	% Increase	Sp. Ed. Students ELA Benchmark 1 (% Mastered)	Sp. Ed. Students ELA Benchmark 2 (% Mastered)	% Increase
2 nd	18.55	36.43	17.88	6.29	11.49	5.2
3 rd	19.56	33.53	13.97	6.98	17.55	10.57
4 th	27.79	37.51	9.72	11.69	14.52	2.83
5 th	39.05	52.08	13.03	12.20	16.33	4.13

Source: RUSD Benchmark Assessment Performance Summary Report 2012-13

District benchmarks in mathematics for grades 2, 3, 4, and 5 show a greater increase in student mastery for all students than the special education subgroup. All students more than doubled the percentage gain of those scoring at the mastery level. As a result, there is a significant gap between the all-student subgroup and the special education subgroup in mathematics as a result of these assessments.

District Blueprint Benchmark Assessments – Elementary Mathematics

Grade	All Students Math Benchmark 1 (% Mastered)	All Students Math Benchmark 2 (% Mastered)	% Increase	Sp. Ed Students Math Benchmark 1 (% Mastered)	Sp. Ed. Students Math Benchmark 2 (% Mastered)	% Increase
2 nd	14.97	49.39	34.42	9.30	23.73	14.43
3 rd	18.22	45.23	27.01	6.90	20.71	13.81
4 th	23.55	45.83	22.28	12.61	21.43	8.82
5 th	20.87	42.79	21.92	7.32	18.75	11.43

Source: RUSD Benchmark Assessment Performance Summary Report 2012-13

District benchmark data for secondary schools was reviewed for grades 6, 8 and 10. This achievement data shows similarities with the elementary benchmark achievement data. Specifically, significant achievement gaps exist between the all-student population and special education subgroups. However, only one benchmark data point was available at the time of this analysis. The difference in achievement at the mastery level was between 7% and 24% in English language arts. For mathematics, one benchmark assessment was available for each grade level (sixth grade general math, eighth grade algebra, and 10th grade geometry). Tenth-grade geometry was 1.83% higher for disabled students than all students.

District Blueprint Benchmark Assessments – Secondary English Language Arts & Mathematics

Grade	All Students ELA Benchmark (% Mastered)	Sp. Ed. Students ELA Benchmark (% Mastered)	% Difference	All Students Math Benchmark (% Mastered)	Sp. Ed. Students Math Benchmark (% Mastered)	% Difference
6th Q2	12.74	5.26	7.48	29.36	14.16	15.2
8th Q3	51.01	23.64	27.37	19.87	9.29	10.58
10th Q3	60.86	36.94	23.92	23.02	24.85	-1.83

Source: RUSD Benchmark Assessment Performance Summary Report 2012-13

Graduation Rate

District graduation rates for disabled students fell significantly below typical peers, measuring 22.4%, 27.9%, and 28.9% below in 2011, 2012, and 2013, respectively. These rates are within the state targets (indicator 1 of District Level Special Education Annual Performance report, California Department of Education).

Suspension Rate

One of the core components of an effective RtI² system is the use of positive behavioral supports. The document available at the following Web address includes more information on RtI²:

<http://www.cde.ca.gov/ci/ct/ri/rticorecomponents.asp>, in².

The Individuals with Disabilities Education Act (IDEA) of 2004 promotes the use of academic and behavioral systems to ensure achievement for all students, including those with disabilities.

One measure of an effective behavior system is the suspension expulsion rate. While the district expulsion rate for students with special needs is within state targets, the suspension rate for the same subgroup is disproportionately high compared to all students. One example is the rate of suspension by federal offense. For the all-student subgroup, 8,216 suspensions were recorded for the 2011-12 school year, approximately 15% of the total student population (although some students are suspended several times).

The special education subgroup had 1,532 suspensions in the same period. While 11% of the total student population is identified as having an IEP, students with special needs represent 18% of the suspensions by federal offense. Students with special needs are four to five times more likely to be suspended than a typical district student. A review of the suspension data found that these results hold steady. Suspensions due to defiance show a disproportionate percentage of students with special needs. Of the total number of students suspended for this reason in 2011-12 (4,188), 18.2% had special needs (763). This is significant since many special education students have some type of behavioral goals included in their IEP.

Certificated Staff Interviews

FCMAT interviewed 15 certificated teaching staff members during this study, including general education, resource specialists, and special day class teachers. The interviews consisted of 20 closed- and open-ended questions that related to multiple aspects of the instructional program in kindergarten through grade 12. A few general themes surfaced related to teaching and learning, and they are outlined by topic below.

English Language Arts (ELA)

All resource program teachers and general education teachers were familiar with and consistently used the district-adopted core instructional program in English language arts for their respective grade levels. They also indicated that they received training in using the English language arts program, but this occurred many years ago. SDC teachers were not as familiar with the core English language arts program and did not indicate consistent use in their classrooms. Most teachers indicated they use other supplemental materials in planning and delivering lessons in English language arts, including sight word lists, adaptive readers, fluency readers, vocabulary worksheets, Read Naturally, skill-based computer programs, Reading A-Z, and Language! ELD workbooks.

Mathematics

Teachers had inconsistent knowledge of the district-adopted core instructional program in mathematics. Many teachers were not familiar with the name of the district’s core mathematics program. Many indicated they use other supplemental resources during math instruction such as manipulatives, algebra tiles, black line masters, Singapore math, Basics 2 curriculum, assorted website resources, and ancillary materials that go with the district core instructional program.

Professional Development and Collaboration

All teachers indicated that they received at least some level of professional development in English language arts and mathematics, but most indicated that occurred many years ago. All teachers indicated they have opportunities to collaborate with their general education and special education colleagues either weekly or monthly.

Instructional Planning

Half the teachers interviewed indicated that they develop lesson plans one week before lessons. A few teachers indicated that they use a yearly unit plan to inform their lesson plan development. Slightly less than half the teachers indicated they develop lesson plans on the day of the lesson or sometimes during the lesson itself. There was some indication that secondary special education teachers are confused about the role of the resource specialist in planning lessons that are delivered in general education.

District Benchmark Assessment

Two-thirds of the teachers indicated they administer the district benchmark assessments in English language arts and mathematics; however, less than one-third stated they use the English language arts assessment data to inform their lessons. Slightly less than one-half of the teachers indicated that they used the mathematics assessment data to inform their lessons.

Strength of the Special Education Program

All teachers were asked to identify one or more strength(s) they felt exemplified the Special Education Department. The responses were varied, with no clear theme.

Weakness of the Special Education Department

All teachers were asked to identify one or more weakness of the Special Education Department. Two themes surfaced. Many indicated that overall communication from the district to the schools should be improved and that opportunities are needed for organized collaboration and training among special education staff.

Recommendations

The district should:

1. Ensure that all students with special needs have access to, and use state-approved, district-adopted core instructional materials in English language arts and mathematics daily.
2. Ensure that all special education staff have access to updated training in using supplemental instructional program materials in English language arts and mathematics that are aligned to the Common Core State Standards.
3. Audit the instructional program structure and curriculum guides for all self-contained special day classrooms districtwide to determine the level of coherence and alignment to state expectations for students with significant disabilities.
4. Ensure high expectations are identified and maintained for disabled students to meet grade level standards provided they are given the necessary interventions, accommodations, and/or modifications.
5. Develop and implement a districtwide Response to Intervention plan that focuses on early identification of need through universal screening, and

provides timely academic and behavioral supports starting in tier 1 (general education classrooms), progressing through consistent tier 2 interventions, and culminating with tier 3 interventions only after tier 1 and 2 supports have been exhausted.

6. Ensure all students, including students in special education, participate in all district benchmark assessments (both formative and summative) in English language arts and mathematics, including students in kindergarten and first grade.
7. Develop and implement a districtwide collaboration procedure that uses state and district student achievement data (formative and summative) to drive conversations and inform lesson design and delivery in all grades K-12. The district should ensure that this procedure includes opportunities for special education staff to work in collaboration with general education staff.
8. Audit all instructional program placement for English learners who have been identified for special education to ensure that they receive high quality English language development instruction daily.
9. Audit the assessment process used for initial IEP identification to avoid over-identification of English learners for special education.
10. Analyze the master schedule development procedure in secondary schools to address the ratio of diploma-bound vs. non diploma-bound tracts and to ensure that students are placed in the least restrictive environment as much as possible.
11. Develop and actively promote the use of a positive behavior support program throughout the district to proactively address maladaptive behavior at the lowest level.
12. Form a special education taskforce (composed of representatives from all groups affected) to research exemplary special education programs and make recommendations that will lead to developing a special education strategic plan. This plan will define the service delivery model for supporting students with special needs.

Communication

Interdepartmental Communication

The district has no formalized systems for communication between Special Education, Finance, Human Resources or Education Services.

Special education staff met with the Business Department during initial budget development to review the 2012-13 budget and determine whether increases would be needed in the 2013-14 budget, and if so, where. Because a special education budget normally fluctuates during the year, it is important for the Business Department to be aware of these fluctuations. Special education continued to meet informally with the Business Department in the past year regarding potential increases in the special education budget. Documentation for budget changes was not provided at these meetings, nor were the meetings regularly scheduled.

Staff indicated the Business Department frequently was not aware of changes that significantly affected the Special Education budget until they were notified by the SELPA.

The two departments should meet monthly to review staffing, nonpublic school placements, nonpublic agency services, out-of-district or out-of-SELPA placements, due process or complaints and mental health funding. This will ensure that the district does not rely on the SELPA for this information. These meetings should have agendas that are developed by both departments and are available for review 24 hours before the meeting. Summary notes of discussion and specific outcomes should be documented.

According to staff, the Special Education Department historically has always been treated as a separate entity, and many district departments operate independently. This is further complicated by the fact that Special Education is under the Student Services Department instead of Educational Services. Special Education should be included in the district's overall structure and be connected to the curriculum and instruction department. The Special Education and Curriculum and Instruction departments have little communication, but increasing this would require a cultural shift for the entire district.

Communication between the Business, Human Resources and Special Education departments is inadequate. The three departments do not have monthly scheduled meetings to discuss issues such as vacancies, budgets, staffing needs, proposals for growth and reductions, and more efficient operation. The three departments formally meet once a year to develop the special education budget; however, they do not always coordinate staffing to ensure awareness and consistency. The Special Education Department lacks long-range staff planning, projections, and budget development.

Parent Communication

An extensive review of the district's website to determine its impact on parent communication found that the site's usability is lacking for an average parent who is moderately familiar with Internet navigation. While the district's main Web page is presentable and has basic website links for interactivity, many of the parent links are difficult to find or broken. Furthermore, the links in the "PARENTS/GUARDIANS" drop-down menu do not provide sufficient narrative to enable a parent to fully understand the information provided. Of the 14 subtopics listed in the dropdown menu, three links were broken (Transportation, RUSD Parent Center, and Safety/Security).

Another aspect of the district's website that could be difficult for parents to use is the "DISTRICT ADMIN." drop-down menu. Parents would respond more positively to a menu with an overview of the district's different departments. Of the eight subtopics in the drop-down menu, only one (Ed. Services) has a narrative that parents can read on the purpose of the department. Perhaps the single biggest omission on the district website is the complete lack of information directly related to programs for special needs students. A robust, interactive Web page dedicated to special education programs would help the parents of these students stay informed about programs and services. The district should also consider making computer stations available at each school for parents and community members who lack access to the Internet.

On October 15, 2013 FCMAT conducted three parent input sessions (morning, afternoon and evening) with 19 parents in attendance. In preparation for these sessions, 2,035 phone calls were made to parents of disabled students through Parent Link and 86% were delivered successfully, with 14% that could not be delivered.

Parents in the focus group reported that many families lack computers or e-mail access; however, the district reported that in a 2009 survey, 73% of parents had these. The district should re-evaluate the status of parent access to computers and e-mail.

Parents were unaware of any options at the district or school sites for them to access the district website; the district reported that the public have access to computers and Internet at the public library located on the Carter High School campus.

Parents attending the focus session indicated that they have no opportunities to provide input to the district or participate in program development. Parents have little trust in the district and stated that they include advocates and attorneys in the IEP process because the schools do not seriously consider their opinions.

The Special Education Advisory Committee operates as a district-sponsored advisory for special education parents. However, parents complained that they do not have access to the committee to provide input; attendance is limited to board members. The committee is newly formed and should follow all guidelines for district advisory committees, including finalization of the draft bylaws.

The committee has provided three parent training sessions, but the district has offered none on support strategies for the home, the curriculum in general education classrooms, or the parent role in the IEP process. The district sponsors no support groups for the parents of students with specific disabilities.

In addition to the parent focus groups, FCMAT also offered parents the opportunity to provide confidential written feedback. Parents indicated that they did not trust the district to deliver confidential feedback so the team made arrangements to receive them in person on October 31, 2013. No written feedback was provided.

Recommendations

The district should:

1. Develop a separate Web page as part of the district website dedicated to providing parents with an overview of special education program services, the support structure, and parent involvement/education opportunities.
2. Include on the page a section that directs parents to appropriate staff who can answer questions and/or address concerns.
3. Provide an anonymous survey link for parents to voice their concerns, and provide input on program service and on topics for parent education.
4. Restructure the overall website layout to include clearly defined department buttons (links) that bring parents directly to key information for each department.
5. Establish new benchmarks that define parent access to e-mail and computers in the district through updated information from parents.
6. Ensure that parents are aware of options for public access to the Internet available in the district.
7. Ensure that the Special Education Advisory Committee operates in alignment with other district committees.
8. Complete and implement bylaws in alignment with other district parent committees.
9. Provide a mechanism for parent input into the development of special education programs and services.
10. Provide parents with the opportunity for input into parent training opportunities.
11. Include the parents of special education students in parent education on the Common Core State Standards.
12. Develop options for parent support groups in disability areas.
13. Hold monthly meetings between Business, HR and Special Education departments.
14. Transfer the Special Education Department to the Department of Educational Services.
15. Ensure special education administration is represented on the cabinet.

Programs, Procedures, Mission, and Beliefs

Procedural inconsistencies, ineffective communication systems, and poor data management have resulted in numerous inefficiencies throughout the district. There is also a systemic lack of focus on instruction and lack of guidance from the highest level of leadership.

The district's mission statement, "is to provide high levels of learning for all students and to inspire people to set goals that maximize their potential." However, the mission is not consistently aligned with the programs and procedures in special education or the district as a whole.

The district's program delivery model at the secondary level was converted to what the district calls a collaborative model, but the site staff did not receive training or guidance when the conversion occurred. Staff is unable to explain this model. Middle schools and high schools operate mainly in a traditional framework of RSP or SDC programs. Although the district made some recent changes to its program model, most students are placed in one program or the other and do not have the opportunity to participate in a combination of programs depending on their academic, developmental, adaptive and social-emotional needs. This is not the most effective means of providing special education services.

Throughout the state, middle schools and high schools are expanding their special education continuum to include programs such as learning centers, co-teaching, collaboration and push-in services. Some of these programs include providing special education teacher support inside the general education classroom for a period of time each day/week and pairing special education teachers with general education teachers to provide daily joint instruction. These teachers work with their counterparts in general education to provide assistance with accommodating curriculum, tests, homework and implementing classroom accommodations for special education students. The continuum includes flexibility that allows students to participate in a combination of service options depending on their individual needs rather than being limited to all special day class (SDC) or resource specialist program (RSP) services with mainstreaming. A combination of services may be provided to best meet the unique needs of each individual student.

The certificated collective bargaining agreement includes language that would enable the district to expand its special education program continuum. It reads as follows:

ARTICLE XVII: DISTRICT RIGHTS AND AUTHORITY

It is understood and agreed that the District retains all of its duties, powers and authority to direct, manage, and control to the full extent of the law. Included in, but not limited to, these duties and powers are the exclusive right to: determine its organization; take appropriate legislative action; direct the work of its unit members; determine the times and hours of operation; determine the kinds of levels of services to be provided, and the methods and means of providing them; establish its educational opportunities of students; determine staffing patterns and the kinds of personnel required; maintain the efficiency of District operations; determine the curriculum; build, move or modify facilities; develop a budget; determine allocations; raise revenues; and to contract out services and/or work to be done in accordance with the law; and to take action on any matter in the event of an emergency.

Although district exit rates are comparable to those of the SELPA, staff indicated they do not always transfer or "exit" students when they no longer qualify for special education. The Special Education Department does not use exit criteria guidelines to determine continued eligibility for special education services. The district should develop and implement exit or dismissal criteria

guidelines for efficiency and caseload purposes, and these should also be used to determine continued eligibility. This type of criteria is used for “fading” or dismissing students from services when the disability no longer exists or no longer adversely affects the student’s educational performance. Over time, this can lead to elevated student numbers for certain services. Some SELPAs and school districts use a dismissal criteria checklist to help with this process.

Staff reported that Special Education job descriptions are out of date. Revised job descriptions will facilitate the district’s ability to design more appropriate and efficient models of service delivery. The district should work with the certificated collective bargaining unit to revise these.

Recommendations

The district should:

1. Ensure that the administration, teachers and service providers have the opportunity to work collaboratively to realign programs.
2. Develop exit/dismissal criteria guidelines for all special education services.
3. Dismiss special education when a student no longer qualifies, using an exit/dismissal criteria.
4. Address the staff perception regarding the inability to exit or dismiss students from IEPs when it is appropriate.
5. Evaluate the option of using the learning center model to broaden the continuum of services available to students.
6. Implement exit/dismissal criteria guidelines.
7. Consider using the collective bargaining language to expand the district’s continuum of services as needed.
8. Align the district’s mission with its programs and procedures.
9. Provide site training regarding the collaborative model.
10. Update the job descriptions.

Special Education Transportation

Of the district’s enrollment of 26,485 students, approximately 3,083 have an IEP based on the June 30, 2013 pupil count. Of those, approximately 305 are transported on 16 district-operated routes. The San Bernardino County Superintendent of Schools transports approximately 296 students on a contract with a for-profit school transportation provider, First Student. Beginning with the 2013-14 school year, the district also has a contract with American Logistics to transport approximately 25 students previously transported by the county office.

School Transportation Finance

Before 1977, school transportation operational costs were fully reimbursed in California. After Proposition 13, the state slowly reduced the percentage of reimbursement. In the 1982-83 school year, the state capped the reimbursement at 80% of the reported costs for each school district. Over the years, an occasional cost-of-living adjustment (COLA) has been granted to the fund, but it has been insufficient to keep up with the rising cost of providing pupil transportation in many school districts. On a statewide basis, this funding covers approximately 35% of reported costs. Because Rialto Unified grew significantly in the past 31 years, its funding is far less than the actual need.

Pupil transportation costs are reported in two resource areas in the California school accounting system. Resource 7230 is for regular home-to-school transportation, and resource 7240 is for severely disabled/orthopedically impaired (SD/OI) transportation. Below is a snapshot of Rialto Unified School District’s report.

TRAN Data

	2011-12 HTS	2011-12 SD/OI	2012-13 HTS	2012-13 SD/OI
# Buses	33.8	43.0	30.8	40.9
# Students	3084.5	359.7	3029.5	421.3
# w/IEP	13.0	140.0	18.0	153.0
# Miles	294,881.7	297,250.6	287,227.3	316,841.0
Revenue	\$601,818.00	\$202,571.00	\$604,336.00	\$203,717.00
Approved Cost	\$2,653,729.18	\$2,165,798.24	\$2,277,302.96	\$2,360,517.27
Cost/Mile	\$8.84	\$7.29	\$7.93	\$7.45
Cost/Pupil	\$844.65	\$ 6,021.12	\$751.71	\$5,605.60
District Contribution	\$2,051,911.18	\$1,963,227.24	\$1,672,966.96	\$2,156,800.27

Source: District documents

Home-to-school transportation can include nonsevere special education students. SD/OI data is intended to report students in wheelchairs and those who are more severe. In addition to the data that is specific to the district’s bus fleet, the district’s TRAN data includes data on buses, students, miles and cost for some students transported by the county office.

The county office provides some transportation for the district on its contract with First Student and separates its excess cost projections for districts into two areas. One is based on students who are considered to be from the East Valley SELPA. Approximately 125 students are included on this spreadsheet (referred to as cost spreadsheet 271 and attached as part of Appendix A to this report). The second spreadsheet is for district transportation costs. This spreadsheet includes

approximately 170 students on (and it is referred to as cost spreadsheet 251 and attached to this report as part of Appendix A). The data from the second spreadsheet is included in the above TRAN data table.

The district has not appropriately identified and separated resource 7230 and 7240 costs. This process has begun for the 2013-14 fiscal year, and it is expected that costs for each type of transportation will be more accurately identified for the 2013-14 fiscal year. Through the end of the 2012-13 fiscal year, most district transportation costs were reported in resource 7230, with only the drivers' salaries and benefits included in 7240 along with the student and cost data from county office spreadsheet 251.

Overall, the amount of 7240 contribution from the unrestricted general fund has steadily grown as shown below:

Year	Amount
2010-11	\$711,079
2011-12	1,963,227
2012-13	\$2,156,800
2013-14	\$2,759,076*

*Budgeted amount

This amount includes the costs of the district's program and the county office program.

Recommendation

The district should:

1. Continue to identify and separate resource 7230 and 7240 costs.

IEP and Transportation Requests

Before the beginning of each school year, the Special Education Department develops a spreadsheet with the most current information regarding students who require transportation service. This spreadsheet includes the student name, home address and the program that the student will attend. It also includes all students who require transportation, except those who are "county" students and forwarded to the East Valley SELPA. The Transportation Department determines the students who will be transported by the department and those that will be forwarded to the county office.

The spreadsheet includes all the students who have an IEP and require transportation as a related service. The district transports the students who are less severe, and the county office transports those who are more severe.

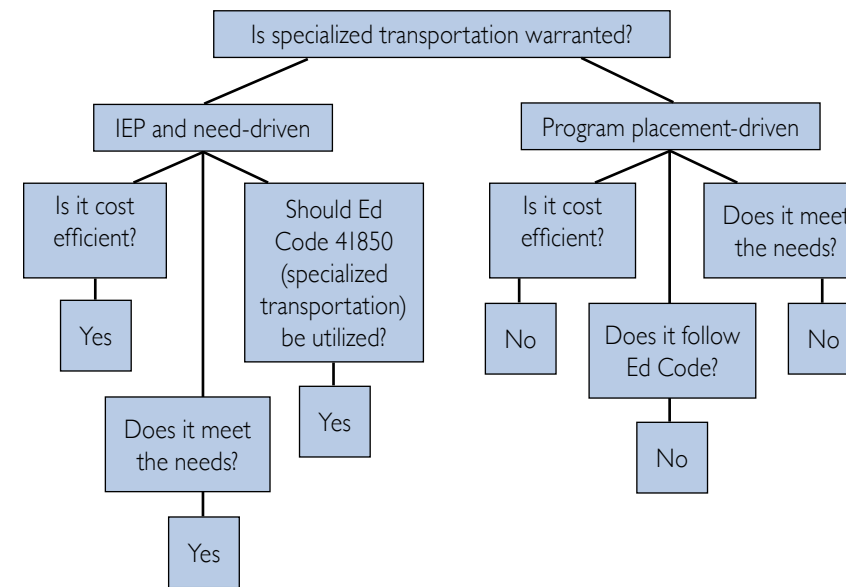
During the school year, additions and deletions are communicated on a bus service request form. These forms have more information that includes emergency contacts, the student's disability and the type of assistive equipment that is necessary. The Transportation Department would benefit from including this information on the spreadsheet at the beginning of the school year.

When the district conducts an IEP, the psychologist is typically the lead district person in the meeting. The psychologist usually enters the IEP information into the data system. All transpor-

tation requests are routed through one clerical person, and this is the person who has direct and constant contact with the Transportation Department. This single point of contact is ideal for both departments.

Approximately 20.3% of students with IEPs are provided with transportation, a rather high percentage of students compared to other districts that FCMAT has studied. In many districts, the average is approximately 10% of students with IEPs. This indicates that psychologists and IEP team members could provide more transportation service than necessary.

The district provided its PowerPoint presentation titled "Special Education Department Articulation IV 2013." Included in that document are guidelines for IEP teams on providing transportation as a related service. A best practice should be to utilize a more detailed decision tree to help guide the IEP team in determining the least restrictive environment for students and the type of transportation service that best suits them. A sample decision tree is shown below:



Recommendation

The district should:

1. Adopt a decision tree to provide transportation as a related service and train psychologists and IEP team leads to use it.

Routing and Scheduling

The district provides SD/OI transportation to 306 students in the morning and 326 students in the afternoon on 16 bus routes, an average bus loading of 19.75 students per route. This is high when compared to other districts that FCMAT has studied. This is primarily because of bell time separation at schools that allows one bus to serve several schools in the morning and in the afternoon, picking up additional students for each grouping. Each bus route consists of several separate runs. In the morning each route has two or three runs, and the same occurs in the afternoon. The 2012-13 TRAN data indicates a cost per SD/OI pupil of \$5,605. That number is incorrect because the district does not separate home-to-school and SD/OI costs appropriately. This data also includes costs for some students transported by the county office.

The Transportation Department utilizes Edulog, a powerful computerized bus routing system, to its full capability.

District staff indicated they receive service complaints, particularly at the beginning of each school year, usually about bus routes that run later than published times. These complaints are generally resolved within the first two to three weeks of school. This is normal for most school district special education transportation operations, and indicates a responsive transportation staff.

Transportation requests that are received throughout the school year are generally scheduled and students are usually served within two or three days. This also indicates a very efficient staff and system.

The district does not have a global positioning system (GPS) installed on its buses. These systems can locate buses, determine travel speed and document the time spent at each bus stop location or school. They also enhance responsiveness to parents and school officials as well as verify the timeliness of route schedules.

Drivers receive 30 minutes to inspect buses and 15 minutes to sweep and clean them for each route. They are also given 15 minutes for a morning break. Drivers may receive additional time (not on their regular contract) for bus washing (up to one hour per week) and fueling time, as necessary. They may also have other drivers wash their buses if approved by the manager. Drivers do not accrue a right to a certain number of guaranteed hours annually. The routes are reset every year, and drivers bid for them based on their seniority position.

The Transportation Department receives a spreadsheet at the beginning of each school year listing all the students who require special transportation. The department determines those who will be transported on district bus routes, and those who will be transported through the county office on First Student routes (the contract provider for the county office). The district serves less-involved students with its routes, and more severe students are transported on county office buses.

County office routes are developed by its employees, who utilize another powerful bus routing program, VersaTrans.

The 271 spreadsheet is based on students who attend county office programs or programs that are not housed in the district. For these students, the district Special Education Department sends the transportation request to the East Valley SELPA, which makes the request to the county office. The spreadsheet is a cost projection for the 2013-14 fiscal year. The estimated student count for the district is 125.25 and is based on the average of the mid-year student count from the prior school year. In this spreadsheet, the cost assigned to the district is \$976,900.23. This is reduced by a share of the county office state school transportation revenue. The remainder of the county office revenue is distributed to the West Valley SELPA. This spreadsheet indicates that the expected cost is \$7,799.60 per student for the year.

The 251 spreadsheet is composed of 170.75 students who attend district programs or noncounty programs at an estimated service cost of \$1,581,742.36. There is no state revenue for these students to reduce that cost. This spreadsheet indicates that the expected cost is \$9,263.49 per student for the year.

The district has begun an effort to take responsibility for more students represented on the 251 spreadsheet. It has contracted with American Logistics, a nationwide transportation company, to transport approximately 25 on smaller, nonschool bus vehicles. At the beginning of the 2013-14

school year, the Transportation Department identified some “district” students (from the 251 spreadsheet) that would be transported on this contract, which stipulates a 3-hour base rate of \$180 per vehicle, or \$230 for a vehicle with a lift gate. The rate is \$30 for each additional half-hour and \$60 for each additional hour. Aides cost an additional \$21 per day, with an additional charge of \$5 for every car seat and \$5 for every safety vest. Twenty-five students are transported in the morning, and 27 in the afternoon. Regardless of the above contract rates, the current amount charged is \$65 per each vehicle for the morning and \$65 each for the afternoon or \$130 per vehicle, per day. The approximate vehicle loading is three students. The cost per student is estimated to be \$7,200 per student for the year, less than the cost charged by the county office on either spreadsheet, but more than the cost of the district providing the service on its own buses (based on the TRAN cost).

American Logistics does not own or operate the vehicles utilized to transport district students, but acts as a middleman. It receives the requests for transportation and contracts with a local transportation provider, which may be a cab company, to provide the service on its own equipment (sedans or minivans). The contract stipulates driver and vehicle minimum requirements to safeguard the district. School buses are statistically safer than any other vehicle on the road. If the district can provide this service in a less costly manner on a safer vehicle, it should do so.

The district receives monthly reports from the county office detailing the students that are transported for Rialto Unified, but the Transportation Department could not locate these lists. These documents should be reviewed to determine which students could be transported on existing routes. Assuming that the district decides to take responsibility for more of these students, the department would need to know them and their placements to plan for the necessary resources.

At Rialto Unified, 20 regular education home-to-school routes transport approximately 3,000 students. The district also performs approximately 1,300 field trip moves (some require multiple buses) per year.

Recommendations

The district should:

1. Consider purchasing and utilizing GPS technology on buses.
2. Study and consider taking responsibility for transporting more district students from the 251 spreadsheet.

Staffing

The transportation department is staffed as follows:

- 1 FTE transportation manager
- 1 FTE dispatcher
- 1 FTE bus driver trainer
- 1 FTE transportation support technician
- 1 FTE placement/transportation technician
- 1 FTE transportation/garage support assistant
- 4 FTE mechanic III-heavy duty

1 FTE mechanic II-automotive/small engine

38 bus drivers

7 substitute bus drivers

Generous overlap in job descriptions allows for a great deal of cooperation among the office staff. If the department adds special education bus routes in the future, more staff may be necessary depending on the number of routes. At present; however, it has adequate office and shop staffing to accommodate up to approximately 10 additional routes.

The mechanic III and mechanic II job descriptions include a requirement for possession and maintenance of a Class B driver license. This license is necessary for a mechanic to test-drive buses, drive them to outside shops, if necessary, and respond to accidents or breakdowns on the road. However, the district indicated that only one mechanic possesses this license. It is imperative for all mechanics to have a Class B license.

The office staff does not meet regularly to discuss departmental issues and concerns or plan. These types of meetings should occur regularly. Communication between the shop and office are important to obtain constantly updated information regarding the status of buses. Procedures on communicating this information should be adopted.

Recommendations

The district should:

1. Ensure all mechanics possess a valid Class B driver license.
2. Hold regular department staff meetings, and adopt procedures on communications between the shop and office.

Vehicle Maintenance and Fleet

The California Highway Patrol Motor Carrier Inspector Division must annually inspect every school bus. The division also annually performs other inspections and issues a report entitled, "Safety Compliance Report/Terminal Record Update", more commonly referred to as the "terminal grade." As a part of this inspection, it randomly inspects buses, vehicle maintenance records, driver time records, driver DMV pull notice records, and federal drug and alcohol testing records. FCMAT reviewed the June 11, 2012 and July 9, 2013 terminal grade and found the district consistently receives the CHP's highest grade of "satisfactory." This reflects a vehicle maintenance program that complies with laws and regulations.

The district lists 59 school buses on its fleet list, approximately 23 designated for special education transportation use. This provides for an adequate number of spare buses. Thirty-six buses are designated for regular education home-to-school transportation and field trips. Because the district has reduced the number of regular education bus routes over the years, it has more buses than necessary for the 20 routes now in operation. If the district intends to continue operating approximately this number of routes, it should have approximately 30 buses that can be used for routes, spares and field trips. The department has considered this and was preauthorized to receive replacement grants for a large number of buses in the fleet, pending funding from the South Coast Air Quality Management District. The grants do not provide a total dollar amount, but are authorized to replace one bus with another. On this program, the district can trade in a regular-education bus for one for special education.

The district was recently awarded bus replacement grants from the South Coast Air Quality Management District for 16 older buses, 10 serving special education and the rest regular-education units. This a partial granting of the total number of buses pre-authorized for replacement by the South Coast Air Quality Management District.

The average fleet age of the school buses is 11.47 years, which makes for a relatively young fleet that will further decrease in average age when the other grant buses are awarded and delivered.

The Transportation Department maintains 223 other district vehicles for the maintenance and operations, grounds, food service, security and warehouse departments. These include pickup trucks, utility vans, forklifts, mowers, trailers and tractors. Small engine tools like trimmers and edgers are maintained by the Grounds Department. Each vehicle has a sticker placed near the odometer indicating when the next service mileage is due, and the operator is expected to generate a work order when the vehicle approaches that mileage. The Transportation Department reported that many operators do not complete this task, and the department receives vehicles only when they experience a mechanical problem. When work is accomplished, labor time, parts and fluids are appropriately charged to the proper department.

Because the district does not have electronic vehicle maintenance software, all work orders are on paper, and the vehicle maintenance history is stored in file cabinets. The department does not generate management information reports for school buses or other district vehicles. As a result, the district cannot make informed decisions about proper preventive maintenance or easily determine the cost of maintaining certain vehicles. A large amount of parts are stored at the maintenance facility in several different storage rooms with no inventory of this stock or knowledge of its value. Judging from the dust and grime on many of the boxes, much of the stock has probably been on the shelves for years. Mechanics purchase parts; however, without an organized inventory system, they may buy parts that are already in stock because no one organizes and keeps track of the district inventory. The district's shelves could also store parts for vehicles it no longer operates. The district should consider purchasing a vehicle maintenance software system.

Title 13 of the California Code of Regulations, Section 1232 requires school buses to be inspected every 45 days or 3,000 miles, whichever comes first. The district has a practice of inspecting the buses every 30 days, primarily because it has no way to easily verify daily mileage. This is one way to remain in compliance with the regulation for buses that may travel more than 3,000 miles in 45 days. However, the district can also collect mileage from at least one other source; drivers report their mileage daily, and the bus driver trainer logs those mileages every day. The mileage for many vehicles is also entered into the electronic fueling system (but this is not a requirement for all vehicles).

Each school bus preventive maintenance inspection takes approximately two hours to perform, excluding any needed repairs. The difference between performing inspections every 30 days and every 45 days results in the need for four additional inspections every year for every bus. This amounts to approximately 472 additional work hours or approximately 59 work days per year. This practice is in excess of the regulation and may be expensive. It could be rectified by having more timely mileage information.

The district also owns and operates four passenger vans that teachers or coaches can check out to use for small groups of students; however, they are not maintained any differently than the other white fleet vehicles. They should be maintained the same as school buses.

The fuel system includes dispensing for gasoline and diesel fuel and is managed by an older electronic fuel management system. This software system is antiquated and should be replaced with one that can be integrated into a vehicle maintenance management software system. The fuel system also serves the city of Rialto, and city employees have access at any time. There is discussion of upgrading the system and constructing a new transportation facility on another property nearby.

The district also operates a small, slow-fill compressed natural gas (CNG) fueling system with eight bus fueling locations. Twenty-eight buses in the fleet are powered by CNG. Although the district has worked to rotate buses that are fueled on-site, this is a difficult logistical issue. Some buses are fueled off-site, which can be costly. If the district determines that it will remain at its current facility, it should expand the capacity of the CNG fueling system.

Recommendations

The district should:

1. Determine how many large buses are necessary in the fleet, and apply for some special education buses when the next bus grant opportunity arises.
2. Purchase and implement a vehicle maintenance software system.
3. Develop an inventory of vehicle parts and organize all district vehicle maintenance parts in one secure area.
4. Develop a method of accurately reporting mileage to reduce the frequency of bus inspections.
5. Maintain passenger vans that transport students as if they were school buses.
6. Upgrade the fuel management system and integrate it into the vehicle maintenance system.
7. Consider expanding the CNG fueling capacity.

Facility

The transportation facility is a large site shared by the Maintenance, Operations, Grounds, Food Service and Warehouse departments. The Transportation Department offices and driver's lounge are well maintained. The shop building is older and in need of attention.

The district is in the process of procuring a nearby property for a new fueling system and transportation facility. The current facility is adequate for district needs; however, significant Transportation Department growth may place additional stress on it. If the district develops a new transportation facility, it should consider the potential growth of the department and district needs.

Driver Training and Safety

School bus driver training in California is highly regulated. Education Code Sections 40080-40089 govern the training requirements for bus driver instructors and school bus drivers.

Bus drivers must receive a minimum of 20 hours of classroom training and 20 hours of behind the wheel training to receive their license. They take a specialized written and behind-the-wheel test administered by the California Highway Patrol and annually receive a minimum of 10 hours

of in-service training. In the last year of their special license validity, they must receive 10 hours of specific classroom training. In short, school bus drivers are the most highly trained and regulated drivers in California. The training must be provided by a state certified school bus driver instructor. Behind-the-wheel training may be given by a delegated behind the wheel instructor. The California Department of Education has developed curriculum for instructors and provides a training and certification program.

The district has one bus driver instructor on staff. The transportation manager is also a state certified school bus driver instructor, but the staff includes no delegated behind-the-wheel instructors.

The district has not provided training for new school bus drivers in at least 12 years. The local area reportedly has a number of school bus drivers, and the district's salary level is attractive. Since most school districts have great difficulty recruiting school bus drivers, this is a real benefit for this district.

The bus driver instructor provides approximately two renewal classes per year for drivers who need to renew their license. He also provides one in service meeting per month as well as a large in-service meeting at the beginning of the school year. The bus driver instructor occasionally rides along with drivers to evaluate their driving skills.

The district has few accidents, which is an indicator of an effective bus driver training program. Drivers are provided with refresher training after every accident.

Education Code Section 39831.3 requires every school district to develop a transportation safety plan housed at each school site and ready for inspection by any CHP officer. The district complies with this law.

The district has rarely provided specific, in-depth training for school bus drivers on the disabilities of special education students and strategies to manage them on school buses. The Special Education and Transportation departments should collaborate on regular training programs for school bus drivers.

Recommendation

The district should:

1. Provide relevant training for special education bus drivers.

Appendices

A: Transportation Spreadsheets

B: Study Agreement

Appendix A - Transportation Spreadsheets

San Bernardino County Superintendent of Schools
 East Valley Transportation Cost Projection (271)
 2013/14
 January-Prelim

<u>District</u>	<u>Est Student Count</u>	<u>Cost</u>	<u>Transferred Amt</u>	<u>Balance</u>	<u>Scheduled Oct/March Transfer</u>
Cotton		\$0.00			\$0.00
Redlands		\$0.00			\$0.00
Rialto	125.25	\$978,900.23			\$408,450.11
Rim Of The World	0.00	\$46,797.81			\$23,398.81
Yucaipa		\$0.00			\$0.00
	131.25	\$1,023,697.84			

Expense Information

<u>Budget Object</u>	<u>Amount</u>
Salaries - 2000	\$55,547.00
Benefits - 3000	\$23,702.00
Supplies - 4000	\$1,500.00
Services - 5000	\$1,308,721.00
H/S Transportation - 5818	\$1,296,574.00
Equipment - 6000	\$0.00
Indirect - 7000	\$8,134.00

The line item "H/S Transportation" is included for informational purposes only. The amount is included in the "Services" line item.

Expenses:	\$1,397,604.00
Revenue:	\$373,906.18
Excess Cost:	\$1,023,697.82

- 1. Review the due process requests and costs over the past three years and provide strategies to reduce or lower overall costs and requests.
- 2. Review the SPP PAs part for the provision of mental health services pursuant to statutory requirements to transfer of mental health services to municipalities by PHC or respite and review with the fiscal and programmatic impact.
- 3. Analyze the success and success of the A mental health services and expenses to evaluate effectiveness and efficiency.

Special Education

Review the current transportation special education delivery system to determine if it is aligned to the needs of the Individual Education Plan (IEP) to determine if it is appropriate to the current environment.

Private Services

- 1. Evaluate the current state of the special education program and determine if it is appropriate for the district's needs.
- 2. Review the current state of the special education program and determine if it is appropriate for the district's needs. Make recommendations to improve the current state of the program.
- 3. Review the current state of the special education program and determine if it is appropriate for the district's needs. Make recommendations to improve the current state of the program.
- 4. Review the current state of the special education program and determine if it is appropriate for the district's needs. Make recommendations to improve the current state of the program.
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- 9. Review the current state of the special education program and determine if it is appropriate for the district's needs. Make recommendations to improve the current state of the program.
- 10. Review the current state of the special education program and determine if it is appropriate for the district's needs. Make recommendations to improve the current state of the program.

Program Evaluation

- 1. Evaluate the district's identification and exit rates for students with disabilities to determine if the district exceeds the statewide majority of SPP PA average.
- 2. Review the district's compliance history with state and federal requirements for special education.
- 3. Determine the extent to which students are identified in the district. Review the district's compliance with state and federal requirements for special education.
- 4. Evaluate the extent to which students with disabilities are receiving appropriate curriculum and instructional interventions for improvement if needed.
- 5. Analyze the overall effectiveness of special education programs in the district. Review the district's compliance with state and federal requirements for special education.

Parent Involvement

Parent Involvement

- 1. Review the current state of the parent involvement program and determine if it is appropriate for the district's needs.
- 2. Review the current state of the parent involvement program and determine if it is appropriate for the district's needs. Make recommendations to improve the current state of the program.
- 3. Review the current state of the parent involvement program and determine if it is appropriate for the district's needs. Make recommendations to improve the current state of the program.

Program Evaluation

- 1. Review the current state of the parent involvement program and determine if it is appropriate for the district's needs. Make recommendations to improve the current state of the program.
- 2. Review the current state of the parent involvement program and determine if it is appropriate for the district's needs. Make recommendations to improve the current state of the program.
- 3. Review the current state of the parent involvement program and determine if it is appropriate for the district's needs. Make recommendations to improve the current state of the program.

3. Services and Products to be Provided

1. **Cognitive Mapping** – The team will conduct an orientation session at the central school district management and supervisory personnel on the team's procedures and the purpose and schedule of the study.
2. **On-site Review** – The team will conduct an on-site review at the district office and at school sites if necessary.
3. **Final Report** – The team will deliver a written report at the conclusion of the on-site review to all the district officials and include team recommendations, if appropriate.
4. **Cost Factor** – Approximately 30 days after the estimation of the total cost of the study, either directly or indirectly, substantial findings and recommendations to state management, including the issues discussed in the cost estimate.
5. **Final Report** – The final report, upon completion of the review will be delivered to the district's chief administrator for review and comment.
6. **Final Report** – As soon as possible the final report will be delivered to the district and a copy will be sent to the county superintendent following the completion of the review. The report will include the Form DMMI as a supplement.
7. **Follow-Up Support** – The stated DMMI will be sent to the district and the county superintendent, completion of the study. Consistent with the process of implementation of the recommendations included in the report, the process of implementation of the recommendations will be documented to the district and DMMI team members later.

3. PROJECT PERSONNEL

The following table summarizes how the project will be supported by personnel from the District and Management Assistance Team. The project will be supported by the School Office and the District Office as follows:

School District	Management Assistance Team
1. District Administrator	1. District Administrator
2. District Manager	2. District Manager
3. District Supervisor	3. District Supervisor
4. District Secretary	4. District Secretary
5. District Clerk	5. District Clerk

The following table summarizes how the project will be supported by personnel from the District and Management Assistance Team. The project will be supported by the School Office and the District Office as follows:

School District	Management Assistance Team
1. District Administrator	1. District Administrator
2. District Manager	2. District Manager
3. District Supervisor	3. District Supervisor
4. District Secretary	4. District Secretary
5. District Clerk	5. District Clerk

4. PROJECT COSTS

The cost of studies requested pursuant to FC 42017-8-010 is distributed as follows:

- A. \$500 per day for each staff member while on site conducting fieldwork, whether for training, program, and presenting reports, or participating in meetings. The cost of independent DMMI consultants will be billed at their actual daily rate.
- B. Actual out-of-pocket expenses, including travel, meals and fuel.
- C. The district will be responsible for actual costs with the following assumptions: (a) the study will be completed on the on-site review and the cost of the study is approved and staff's acceptance of the findings.

Based on the elements noted in section 2.A, the total estimated cost of the study will be \$40,000.

- D. Any amount for the report will be added to the total cost.

The project will be supported by the District Office and the District Office as follows:

5. RESPONSIBILITIES OF THE DISTRICT

- A. The district will provide office and interview space and data for site reviews.
- B. The district will provide travel, meals, and lodging.

- A. Management Assistance Team
1. The district will provide office and interview space and data for site reviews.
2. The district will provide travel, meals, and lodging.
3. The district will provide office and interview space and data for site reviews.
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