



CSIS California School Information Services

Sweetwater Union High School District

Special Education Review
March 13, 2014

Joel D. Montero
Chief Executive Officer







CSIS California School Information Services

March 13, 2014

Edward Brand, Ed.D., Superintendent
Sweetwater Union High School District
1130 Fifth Avenue
Chula Vista, CA 91011-2896

Dear Superintendent Brand,

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

1. Provide an analysis of staffing ratios, class and caseload size using statutory requirements for mandated services and statewide guidelines.
2. Provide an analysis of all staffing and caseloads for related service providers including psychologists, occupational and physical therapists, speech therapists, behavior specialists, nurses and others.
3. Conduct an evaluation of transportation services for special education students to ensure efficiency and identify potential cost savings. Review these services with regard to the role of the IEP, routing, scheduling, operations and staffing.
4. Review the resources allocated for nonpublic schools and agencies, mental health services and alternative programs and make recommendations for greater efficiency.
5. Review the efficiency of instructional aide staffing in special education programs. Analyze procedures for identifying the need for 1-to-1 instructional aides, and the process for monitoring the allocation and the need for continuing instructional aide support from year to year.
6. Compare the administrative structure and support staff for special education with districts of comparable size and make recommendations for greater efficiency.
7. Determine whether the district provides programs and services in special education above the level mandated by federal and state law.

FCMAT

Joel D. Montero, Chief Executive Officer

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

Sincerely,

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

Joel D. Montero
Chief Executive Officer

Table of Contents

Foreword	iii
Introduction	1
Background.....	1
Study Guidelines	1
Study Team.....	2
Executive Summary	3
Findings and Recommendations	
Staffing and Caseloads.....	5
Special Education Transportation.....	13
Nonpublic Schools and Agencies.....	25
Instructional Aides.....	31
Administrative Support Structure	37
Programs and Services.....	39
Appendices.....	41

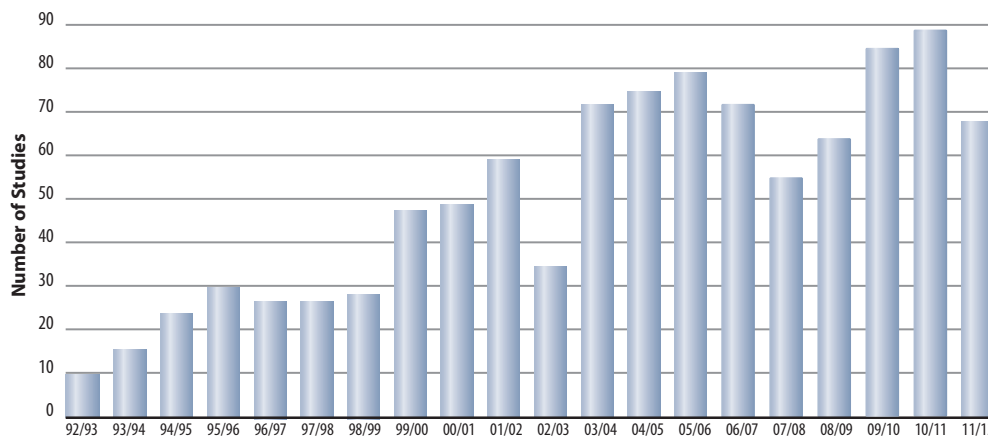
About FCMAT

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 offices 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

The Sweetwater Union High School District is a grades 7-12 district located in the Chula Vista area of San Diego County, and has grown rapidly over the past few decades. The district's enrollment is approximately 40,916. Approximately 4,850 students are identified for Special Education.

The district operates 11 middle schools, 12 comprehensive high schools, one continuation high school and two Special Education academies. Except for Olympian High, every high school has a learning center on campus. The district's geographical area is approximately 100 square miles. The feeder elementary school districts are: South Bay, San Ysidro, Chula Vista, and National.

Because of ongoing state budget reductions and increased operating costs, Special Education encroachment on the district's unrestricted general fund has increased each year.

The district's goal is to decrease encroachment on the unrestricted general fund while continuing to meet maintenance-of-effort requirements and delivering high quality educational services to its students.

Study Guidelines

FCMAT visited the district on September 9-12, 2013 to conduct interviews, collect data and review documents. This report is the result of those activities and is divided into the following sections:

- Staffing and Caseloads
- Special Education Transportation
- Nonpublic Schools and Agencies
- Instructional Aides
- Administrative Support Structure
- Programs and Services

Study Team

The study team was composed of the following members:

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Mission Viejo, California

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

Executive Summary

Special education encroachment on the district's unrestricted general fund increases each fiscal year. The second interim financial report (2012-13) shows that encroachment on the unrestricted general fund is 39.4%, excluding transportation costs, but does include the 10% required contribution from the general education budget, while the average in most districts with comparable programs is approximately 25% to 35% including transportation.

The district identification rate for disabled students is 12%, which exceeds the statewide average of 10%. The district should review each disability area for overidentification and make appropriate adjustments to operate within the statewide average.

In this report, FCMAT has made recommendations that could decrease Special Education encroachment on the unrestricted general fund by \$3,897,972, while continuing to meet maintenance-of-effort (MOE) requirements and federal and state requirements for disabled students. MOE requirements are found in Part B of the Individuals with Disabilities Education Act (IDEA) (20 USC 1413 (a) (2) (A) and implementing regulations (34 CFR 300.230-300.232). Briefly, the MOE requires Part B IDEA funds to be used as follows:

- To pay the excess costs of providing Special Education and related services to children with disabilities,
- To supplement state, local or other federal funds and not to supplant such funds, and
- Shall not be used, except in specified cases, to reduce the level of state and local Special Education requirements below that of the prior year.

FCMAT found that Sweetwater has a similar total number of administrative positions as districts of comparable size; however, the district's placement of school psychologists in an assessment and administrative role is unique. The programmatic/efficiency effects of this administrative model are discussed in this report.

A reduction of some Special Education certificated staffing positions is recommended and could yield a projected annual cost savings of \$1,218,373. Each recommended reduction is based on staffing requirements in the Education Code or guidelines developed by School Services of California, Inc. (SSC), which are used as the industry standard for Special Education staffing.

FCMAT has highlighted several areas where the salary practices established in the certificated collective bargaining agreement have increased the overall costs of Special Education and its encroachment on the unrestricted general fund. The agreement for an additional nine days per year per teacher to complete individualized education program (IEP) paperwork and attend IEP meetings costs the district \$250,000. Teachers/specialists teaching on preparation period or carrying an additional caseload beyond the statutory requirement costs \$775,928. The classification of 71 instructional 1-to-1 aides as instructional health care assistants at 7.5 hours increases the district's staffing costs by \$1,151,737, without a documented need.

The district has 4,850 students with IEPs, with a general education population of 40,916 students. The district transports 16% of its disabled students, which exceeds the average of 10% in districts studied by FCMAT.

California provides approximately 35% of the revenue necessary to provide student transportation statewide. The district's revenue of 25% is less than the statewide average because of its enrollment growth over the past 30 years. The low revenue is not related to the relative efficiency

of the district's transportation program but rather to the way the state funds transportation services.

Transportation staffing does not adequately support dispatching or driver training. FCMAT has identified a number of concerns regarding vehicle maintenance and safety compliance. The district received an unsatisfactory rating in 2011 and 2013 in the annual Safety Compliance and Terminal Record Update conducted by the California Highway Patrol. Numerous issues need to be corrected to ensure student and employee safety.

The transportation facility is located at the district office, but the Special Education buses are located at another site with no supervision. This impacts effective communication and supervision of staff. The shop does not have enough work bays for the number of mechanics on staff. The district should consider a unified site, with sufficient space to conduct the necessary work.

Findings and Recommendations

Staffing and Caseloads

Class sizes and compensation for exceeding class sizes or number of periods taught per day are established in Article 7.1, 7.2 and 7.5 of the district's California Teachers Association (CTA) and National Educational Association (NEA) contract. The articles state the following:

7.1 - The allocation of full-time 7-12 school classroom teachers for staffing purposes only, shall not exceed twenty-eight to one (28-1). This allocation shall be based on a six (6) period workday, and shall be calculated pursuant to administrative estimates of expected enrollments during the third school month of each semester.

The parties also agree that the special needs of pupils may require the reduction of the average class size for certain classes. Pupils in special classes, alternative classes, opportunity classes, special day classes for work experience, physically handicapped classes, and study hall are excluded from the enrollment estimates for purposes of determining the aforementioned allocation. The District is not required to fund additional teachers above the twenty-eight to one (28-1) staffing ratio in order to comply with Sections 7.3 and 7.5.

7.2 - Staffing adjustments needed to meet this ratio in Section 7.1 at any 7-12 school shall be made necessary dependent upon student enrollment. When 7-12 staffing indicates a change of .20 or more, staffing will be adjusted accordingly.

7.5 – SDC classes will be staffed at a district average of fifteen (15). The district will provide data on SDC classes for each site no later than the 15th instructional day of each semester.

Staff reported that when resource specialist program (RSP) and special day class (SDC) teachers teach during their prep period or exceed their caseload maximum, they are given a .20 FTE increase in salary. Each fiscal year the district determines which staff members are entitled to the .20 FTE increase. This is monitored by the special services director and program managers throughout the school year. This is expanded upon in a separate section of the report. The Special Services Department uses a formula to assign teacher allocations to each site.

All Special Education teachers are provided with nine days of substitute teacher time so they may work on IEP paperwork and attend IEP meetings, at a program cost of \$250,000. Most of the time a roving substitute teacher is hired to accommodate this release time. A portion of the Special Education teachers' caseloads consists of students that are not in the classes they teach each day. In these situations, the teachers find other ways to monitor and consult with their students. This is a common practice in high school districts.

Special Services Department staff reported that they are not always aware of the employee position vacancies in the department. This may be due, in part, to a lack of compatibility between the Human Resources' and Finance Department's software systems. A system needs to be established for the Special Services Department to monitor vacancies weekly, with verification by Human Resources and Finance.

Several teachers have split positions described as RSP/SDC or SDC/RSP. To calculate class size ratios and caseloads, these teachers' FTE and class size/caseload information was grouped by the primary position title with the respective data set. For example, RSP/SDC teachers were grouped with RSP caseload calculations. Caseloads are not calculated by teacher but by the total number of students (RSP at 28:1 and SDC at 18:1). Once the site administrator receives his/her total special education FTEs, he/she may split assignments as needed.

The district provided data showing sites with Special Education teacher vacancies. These vacant positions included FTEs and caseload numbers and were included in the caseload and class size ratio calculations because they are anticipated to be filled in the near future and are considered part of the Special Education staffing for the 2013-14 school year.

In addition to the staff described in the following sections, the district has four teachers (1 FTE each) on special assignment who provide coaching, professional development and collaboration to support Special Education classroom teachers. Two technology assistants provide help with assistive technology. There is one resource teacher for autism programs and an employment development specialist who provides transition support.

Resource Specialist Programs (RSP)

The district adjusted data showing 24.2 FTE of RSP teachers at the middle school level. These RSP teachers maintain average caseloads of 24 students, slightly below the statutory maximum caseload of 28 (EC 56362(c)). If RSP caseloads were increased to the Education Code maximum, the district could potentially reduce the teacher FTEs from 24.2 to 20.7 for a projected savings of \$278,666 including statutory and health/welfare benefits. Logistics, student needs, and unique programming structure at the middle school level may not make it feasible to reduce staff while maintaining appropriate course offerings and class sizes.

The district has 56.6 FTE of RSP teachers at the high school level. The RSP caseload across all high schools is 1,324. The average caseload ratio is one RSP teacher to 23 students, which is slightly below the Education Code 56362(c) maximum ratio. Although the overall average ratio is below the maximum, seven high school RSP teachers carry caseloads that exceed the 28 student maximum and do not receive the .20 FTE salary increase.

If high school RSP teacher caseloads were increased to the Education Code maximum, the district could potentially reduce the teacher FTEs from 56.6 to 47.0 for a projected savings of \$746,342 including statutory and health/welfare benefits. However, like middle school RSP programs, logistics, student needs, and the unique scheduling needs of high schools and middle schools may not make it feasible to reduce the number of RSP teachers.

Comparison of Resource Specialist Caseloads to Education Code Caseload Maximum

Resource Specialist Program (RSP)					
Level	Total Teacher FTE	Total Students	Total Ratio	Education Code Maximum Ratio (FTE to Student Caseload)	Teachers w/ additional .2 FTE salary
Middle School	24.2	580	1:24	1:28	0
High School	56.6	1,324	1:23	1:28	7

The Portal is a small school setting and has a full six-year WASC accreditation. This site provides A-G courses required for colleges and universities. The school offers courses in advanced placement, academic support, independent studies, tutoring and educational technology. A

credentialed Special Education teacher provides direct services for RSP students with IEPs as well as consultation and collaboration with general education teachers. The table below shows the caseload ratio for the Portal program.

Comparison of Resource Specialist Caseloads to Education Code Caseload Maximum

Portal					
Level	Total Teacher FTE	Total Students	Total Ratio	EC 56362(c)	Teachers w/ additional .2 FTE salary
Middle School	.80*	14	1:18	1:22	0

*Note: The Portal teacher position was vacant at the time of the FCMAT study.

A .80 FTE RSP teacher position at the Portal program was vacant when FCMAT's fieldwork was conducted. The caseload at this site is 14 students, which equates to a caseload ratio of one full-time teacher to 18 students and is lower than the Education Code maximum of 1-to-28. There was a discrepancy between two documents in the district provided data. One document indicated .60 FTE and the other document indicated a .80 FTE position. The .80 FTE was used to calculate the caseload ratio.

Mild to Moderate and Moderate to Severe Special Day Class Programs (SDC)

The district has a range of SDC programs including mild-moderate, moderate-severe, transition and PVA. Pacific View Academy (PVA) is a special day class for students with moderate to severe disabilities with significant behavior challenges. It includes a behavior component that focuses on positive behavior supports and strategies. The district's three PVA classes are housed at San Ysidro and Bonita Vista high schools and Bonita Vista Middle School. The classroom cap is seven students.

The Student Transition Educational Program (STEP) serves adult students ages 19-22 who are non-diploma bound and have at least one year of experience in a moderate to severe transition program. The focus of the STEP program is to teach students how to gain direct hire employment skills and become independent. WorkAbility funding supports this program. STEP is located off campus to maximize the development of independence and facilitate the transition process. The program operates five days a week for six hours per day.

The district provided FCMAT with data to analyze class and caseload size using statutory requirements for mandated services and statewide guidelines established by SSC. The two tables below provide a summary of SDC ratios for the middle school and high school levels. They are organized by type of SDC and indicate the average student to teacher ratio and the average number of students per caseload. The number of students on a teacher's caseload is typically higher than the average number of students per class that they teach. Many teachers case manage students who are not in their classes during the instructional day.

Special Day Class Caseload Ratios

Middle School Special Day Classes						
Program	Total Teacher FTE	Total Students	Total Ratio	SSC Recommended Guideline	Average Caseload	Teachers w/ additional .2 FTE salary
Mild-Moderate SDC	22	319	1:15	1:12	22	0
Moderate-Severe SDC	14	158	1:11	1:10-12	NA	0
Emotionally Disturbed (ED)	2	16	1:8	1:8-10	NA	0
PVA	1	7	1:7	1:8-10**	8	0

**Note: District policy requires the ratio in the PVA/PVAT classes to be 1:7.

The mild to moderate SDC teacher to student ratio is 1-to-15, which is above the SSC-recommended guideline for middle school classes. The moderate to severe SDC ratio is 1-to-11, within the SSC guideline. There are two classes for students with emotional disturbance (ED) at the middle school level; the average class ratio is 1-to-8 and falls within the recommended guideline. The PVA class has a lower ratio than recommended by SSC; however, district policy requires the class size ratio in this program to be no higher than 1-to-7. The PVA class size ratio is, in fact, 1-to-7.

The district has established policy regarding caseload guidelines for SDC teachers who serve mild to moderately disabled students, which is calculated separately from average class size ratio. Mild to moderate SDC teachers may provide case management for up to 28 students. The average caseload for mild to moderate SDC teachers is 22.

District policy indicates that teachers who have caseloads that exceed the district policy maximum caseload of 28 are entitled to an additional .20 FTE of salary. There are currently no SDC teachers whose caseloads exceed the maximum of 28 students at the middle school level. For every 18 students, a site is assigned another teacher.

The table below indicates that the mild to moderate high school SDC teacher to student ratio is 1-to-11 and is slightly lower than the SSC recommended guideline. Moderate to severe SDC ratios are 1-to-10, within the recommended guideline. Emotionally disturbed (ED) class ratios are 1-to-8 and within the recommended guideline.

Transition program ratios are 1-to-21 and above the recommended guideline of one teacher to 12-14 students. The district-provided data indicated one transition teacher and a caseload of 21 students. It is fairly common across the state for transition programs caseloads to be higher than recommended. The transition program teacher currently has a 21-student caseload and is compensated with an additional .20 FTE salary for exceeding caseload per district policy. STEP program ratios were not provided to FCMAT.

The PVA/PVAT program has a ratio of 1-to-6, and although this ratio is lower than the recommended SSC guideline, it is within the district established policy.

Special Day Class Caseload Ratios

High School Special Day Classes						
Program	Total Teacher FTE	Total Students	Total Ratio	SSC Recommended Guideline	Average Caseload	Teachers w/ additional .2 FTE salary
Mild-Moderate SDC	42.8	476	1:11	1:12-15	22	4
Moderate-Severe SDC	43.8	449	1:10	1:10-12	10	2
Emotionally Disturbed (ED)	4.6	39	1:8	1:8-10	9	0
Transition	1	21	1:21	1:12-14 (varies)	21	1
STEP	2	22	NA	1:12-14	11	2
PVA/PVAT	3	18	1:6	1:8-10**	NA	0
Total						9

**Note: District policy requires the ratio in the PVA/PVAT classes to be 1-to-7.

Nine high school teachers receive an additional .20 FTE of salary at a cost of \$173,107 including statutory and health/welfare benefits. It would be prudent for the district to examine these caseloads as part of its ongoing monitoring process and determine if the additional salary is warranted.

Alta Vista Academy, East Hills Academy and Life School Day Rehabilitation

The district provides three alternative programs for students with unique mental health and behavioral needs: Alta Vista Academy, East Hills Academy, and Life School. The table below summarizes the staff to student ratios at these school sites.

Alternative Special Education Programs

Program	Teacher FTE	No. of Students	Student to Staff Ratio	Teachers w/ additional .20 FTE salary
Alta Vista Academy	9	Not Available	Not Available	0
East Hills Academy	9	Avg. 8	1:9	9
Life School	2	16	1:8	0

Alta Vista Academy is a community day school located on the grounds of a licensed level 12 and level 14 children's residential treatment center operated by New Alternatives. The residential facility provides care and treatment for 80 students between the ages of 12 and 18 years old who are at high risk for assaultive behaviors, self-injury and running away from adult supervision. Alta Vista works with New Alternatives, the Department of Social Services, Foster Youth Services, Voices for Children and the courts. The classrooms are separated into four groups based on the level of service the student receives in his/her residential placement. Each classroom consists of a credentialed Special Education teacher and two behavioral specialists. The district contracts the behavioral specialists from New Alternatives.

East Hills Academy is the district's most restrictive placement. It serves students with IEPs exclusively, most of whom have been unable to have their needs met on a comprehensive campus. East Hills is considered an alternative placement to a nonpublic school (NPS) placement. Set on the grounds of a comprehensive high school, East Hills provides mainstreaming opportunities to meet IEP team recommendations. East Hills consists of two main programs: the Robison Center serves students with mild to moderate disabilities, and the Hawkins Center is designed

for students with moderate to severe disabilities. At East Hills, related services are provided along with support services such as assistive technology, speech therapy, behavioral support, social communication and counseling. These services are integrated into students' daily schedules. In both the Robison and Hawkins Centers, many students have autistic features and/or communication related deficits. Nine teachers at East Hills receive additional salary of .20 FTE at a projected cost of \$164,107.

Life School is a school-based day rehabilitation program that provides therapeutic services to Special Education students in grades seven through 12. The school provides individual, group and family therapy. It also provides educational rehabilitation groups to provide intervention and support for issues that impact students and their families. Staff members provide intervention in the day treatment setting. The primary goal of Life School is the successful transition back to a regular school environment.

Designated Instructional Services (DIS)

District staff provide school psychologist, speech and language pathologist (SLP), orientation and mobility specialist, adaptive physical education (APE) teacher and assistive technology services to students. Staff reported that when DIS staff exceed their caseload maximum or teach during their prep period, they receive an additional .20 FTE in salary.

Eight deaf and hard of hearing (DHH) students are served by San Diego USD through an agreement between the six Special Education Local Plan Areas (SELPAs) in San Diego County using a fee for service model. The school nurses are funded from the unrestricted general fund, with the exception of 1.2 FTE of nurse time that is funded by Special Services. The district does not employ a behavior specialist and there is no job description for this position. The district has one counselor and one assistive technology consultant that are funded by the Special Services Department.

School Psychologists

School psychologists have dual responsibilities at each of the two to three school sites to which they are assigned. Each psychologist fulfills all the requirements of a traditional school psychologist such as evaluation, counseling, and crisis intervention. In addition, they are responsible for Special Education program oversight at their assigned campuses. Staff reported that principals and assistant principals rely on the school psychologists for total oversight of Special Education students and service delivery at their sites.

The rationale given for this dual role is that school psychologists are on the management pay scale. However, throughout California, many psychologists work a longer day and work year and are placed on the management pay scale. Psychologists in these districts serve a traditional role and are not responsible for administrative oversight of Special Education at school sites.

Additional school psychologists' duties in Sweetwater include but are not limited to the following: hiring (including paperwork) and evaluating staff, monitoring absences of instructional assistants, authorizing the use of 1-to-1 instructional aides, serving as administrative designee at all IEP meetings on their sites, participating on interview panels for teacher vacancies, assisting with development of the master schedule, coordinating the crisis response team, attending management meetings, handling discipline issues related to Special Education students and overseeing alternative education placements.

The table below shows the district school psychologist staffing ratio compared to the statewide average established by California Education Facts, a compilation of school district staffing and other data (CalEdFacts). According to district data, school psychologist caseloads are 1-to-2,097. CalEdFacts indicates the average school psychologist to student ratio in California is 1-to-1,466.

The district's psychologists have average caseloads of approximately 600 students more than other California districts in addition to their administrative duties.

In addition to carrying heavy caseloads and performing management duties, the school psychologists had five days cut from their salary/duty calendar in 2013-14 and were the only management staff to have duty days cut. Two school psychologist positions also were cut last year.

Sweetwater UHSD School Psychologist Caseload Comparison

Provider	FTEs by Category	District Enrollment	District Ratio	CalEdFacts Staffing Ratio	Duty Days per Year
School Psychologists	19.6 FTEs	40,916	1: 2,087	1:1,466	187

The district should examine the ratio of school psychologists to students and the numerous management duties. Furthermore, the school psychologists are funded 100% through Special Education, yet many of the duties they perform are for general education. Many districts in California split school psychologist funding between Special Education and general education.

Speech and Language Pathologists

District caseloads for SLPs were compared to the recommended Education Code maximums (EC 56363.3) and are outlined in the table below.

Speech Language Pathologist Caseload Comparison

Provider	District Total Caseload Ratio (Total FTE to Total Student Caseload)	District Average Caseload Ratio	Ed. Code Maximum Ratio (FTE to Student Caseload)	SLPs w/ additional .2 FTE salary
Speech Language Pathologist	21.5:1,350	1:56.9	1:55	11

Source: EC 56363.3

The district employs 21.5 FTE of speech language pathologists who serve as case managers for 1,350 students. The district ratio of SLPs to students is 1-to-63. This exceeds the Education Code maximum ratio of 1:55 (EC 56363.3). Eleven of the SLPs receive a .20 FTE salary increase for carrying caseloads in excess of 55 or for having other assigned duties besides speech services, at an additional cost of \$175,162, which includes statutory and health/welfare benefits. Of the 11 SLPs receiving a salary increase, some carry caseloads of over 55 students and some do not. The SLPs whose caseloads are below 55 have other assigned duties that the district believes warrants the .20 FTE salary increase such as assisting with augmentative devices for student support, services to students with autism, and assistance with monitoring district speech caseloads for administration.

Other DIS Providers

Caseloads for DIS providers in the table below indicate that the adaptive physical education (APE) teachers carry caseloads that are slightly below the SSC guidelines. Some of the APE teachers teach general and physical education classes. Teachers of the visually impaired and orientation and mobility teachers carry caseloads that are within the SSC guideline. District data listed an additional .40 FTE teacher of visually impaired; however, no caseload information was provided and this FTE was not calculated as part of the overall caseload ratios. There is one Braille transcriber and four instructional assistants assigned specifically to provide support to the teachers of visually impaired students.

Designated Instructional Service (DIS) Provider Caseload Comparison

Provider	District Total Caseload Ratio (Total FTE to Total Student Caseload)	District Average Caseload Ratio	School Services Guideline Ratio (FTE to Student Caseload)
Adaptive Physical Education (APE)	15:657	1:44	1:45-55
Visually Impaired and Orientation & Mobility	4:71	1:18	1:10-30

The South County Special Education Local Plan Area (SELPA) provides occupational therapy (OT) services and does not bill the district for these services, but takes the funds off the top, prior to distribution of funds to member districts. There are 3.5 occupational therapists and a .50 certified occupational therapist assistant (COTA) assigned to Sweetwater UHSD. Staff reported that each OT caseload is approximately 100 students.

Recommendations

The district should:

1. Have the Special Services Department monitor Special Education employee position vacancies weekly and consistently coordinate position control with Human Resources and Finance.
2. Analyze the number of middle school and high school RSP teacher FTEs to determine if it would be programmatically sound to reduce positions.
3. Review the staff that receive the .20 FTE salary increase to ensure that the appropriate staff consistently receive compensation according to district policy.
4. Review the psychologist job responsibilities and determine if compliance timelines for evaluations and other duties are met in a timely manner.
5. Consider options for administrative oversight of Special Education programs and services that reduce the impact on necessary school psychologist services and meet the department's operational needs for supervision. Options could include the assignment of credentialed administrators such as assistant principals at the school sites.
6. Review the curriculum, instructional and walk-through components of the school psychologist responsibilities and determine if they would be more appropriately fulfilled by general education staff.
7. Consider reinstating five days into the school psychologist work year.
8. Consider whether it would benefit the district to hire a behavior specialist to serve districtwide.
9. Determine the cause of overidentification of disabled students and make necessary adjustments to align with the statewide average.
10. Consider split funding the psychologist positions between general education and special education. This will not decrease expenses overall but will decrease the unrestricted general fund contribution to special education.

Special Education Transportation

As reported on the 2011-12 Transportation Report (TRAN), the district transported 793 of its Special Education students, or approximately 16%. The district currently transports 915 students on 52 routes.

School Transportation Fiscal Information

California has only partially funded school district transportation costs for the past 30 years. Up to 1977, California fully reimbursed school districts for their reported transportation operational costs. After the passage of Proposition 13, the state slowly reduced the percentage of reimbursement. The funding was capped in the 1982-83 school year at 80% of the costs, and has only occasionally received a cost of living adjustment (COLA). Statewide, California currently provides approximately 35% of the revenue necessary to fully reimburse approved costs for pupil transportation.

The district does receive revenue to reimburse some of the severely disabled/orthopedically impaired (SD/OI) transportation costs. Its revenue is less than the statewide average mostly because the district has grown so much over the past 30 years. The low revenue does not reflect the relative efficiency of the district's pupil transportation program.

No statewide data is available that details the funding history of each district. Prior to the early 1990s, there was only one revenue source. At that time, districts were allowed to separate and self-identify revenue they wished to assign to SD/OI. It is likely that the district assigned all of its pupil transportation revenue to SD/OI at that time.

For the 2011-12 fiscal year, the district received \$1,325,001 in state revenue for SD/OI transportation. This is the most recent year that state statistics are available. In that same fiscal year, the district reported approved costs for SD/OI transportation of \$5,219,739. The district contribution from the unrestricted general fund to Special Education transportation covered approximately 75% of the cost that year.

Below is a data table that summarizes the key financial data as reported on the TRAN for the district's pupil transportation.

TRAN DATA TABLE				
SWEETWATER UNION HIGH SCHOOL DISTRICT				
	2010-11	2010-11	2011-12	2011-12
	HTS	SD/OI	HTS	SD/OI
# BUSES	34	53	34	53
# PUPILS	3,873	831	3,434	793
W/IEP	0	831	0	793
MILES	496,469	770,001	731,416	984,803
APPROVED COST	\$ 4,118,827.87	\$ 5,389,545.72	\$ 5,276,797.50	\$ 5,219,739.00
REVENUE	\$ -	\$ 1,312,336.00	\$ -	\$ 1,325,001.00
DIST. CONTRIBUTION	\$ 4,118,827.87	\$ 4,077,209.72	\$ 5,276,797.50	\$ 3,894,738.00
COST/MILE	\$ 8.25	\$ 7.00	\$ 5.72	\$ 5.28
COST/PUPIL	\$ 1,058.00	\$ 6,482.65	\$ 1,217.40	\$ 6,551.52

The district should consider the following with regard to SD/OI:

- For the 2010-11 and 2011-12 fiscal years the district operated 53 routes.
- The number of students slightly declined.
- The miles increased significantly, which reduced the cost per mile. This indicates the mileage may have been incorrectly reported.
- The cost per pupil increased slightly because fewer students were transported.

In the 2013-14 school year, the district has budgeted \$35,000 to pay parents' mileage in lieu of transporting students on buses. This practice is authorized in Administrative Regulation 3540 as allowed by Education Code Section 39806. School districts that pay parents in lieu of transporting their students do so because it costs less than the district providing the service. In some cases, the IEP contains an overriding concern, and it is determined that parent transport would be the most appropriate mode. The district has a contract and rules for this and sets a standard rate for the reimbursement. Parents are required to file a claim for reimbursement. The district should always reevaluate this option with each student IEP.

For the 2013-14 school year \$36,000 is already allotted to parent transportation contracts. In 2012-13, \$34,596.07 was spent to pay parents for providing transportation, and \$26,298 was spent in 2011-12. The decision to pay a parent to transport the student is made at the IEP meeting. The Transportation Department is often asked for its input regarding this. The expense is a line item in the transportation budget, Resource 7240 (SD/OI). The amount that the district contracts to pay each parent varies based on the distance and mileage. For the 2013-14 school year, six students are under contract. Two are estimated at \$4,500 for the annual cost, one at \$5,500, and three at \$7,000. The most current reported average cost per student on the district's TRAN report is \$6,551.52.

Drivers are guaranteed a minimum of 6.5 hours per day per the collective bargaining agreement. A review of the Special Education routes indicates that drivers are paid for a relatively significant amount of time in excess of their bus route time. Comparing the actual route time to the 6.5 hour guarantee, the 52 Special Education drivers are collectively paid approximately 48 hours per day in excess of route time (including bus checkout, sweep and fuel time). At step 1 on the salary schedule for drivers this amounts to \$888.48 per day or \$159,926 per year. This calculation was done only utilizing step 1 and does not include salary-driven benefits or health and welfare benefits. The actual savings would be more.

In addition to the driving time of each route, drivers are paid 15 minutes to check out a small bus, 20 minutes to check out a large bus, and 15 minutes for sweep or clean time. Drivers fuel their own bus, and that time is also built into the guaranteed route time. An economical outside service washes the buses, so drivers are not paid to wash the exterior of their own bus.

Bus attendants or aides are assigned by two different processes. The IEP team may assign a 1-to-1 aide to the student. In that case the aide is assigned by the Special Services Department, and may be the classroom aide that is assigned to the student. The cost of these aides is assigned to the Special Services Department, but the Transportation Department directs them relative to where they get on the bus. The Transportation Department also has 13 bus attendants for the 2013-14 school year. These attendants are not assigned according to the IEP process. Their need is determined by the Transportation Department, and historically they are assigned to routes that serve students at nonpublic schools or to bus routes with students that exhibit more severe

behaviors. These employees are paid from the Transportation Department budget and supervised and evaluated by the department. There is a general lack of understanding of these aides, the process of their assignment and who evaluates them. The Special Services Department and the Transportation Department should conduct a joint review of bus aide assignments and responsibilities.

Community based instruction field trips for Special Education classes occur at a rate of one trip per month. These trips are scheduled and invoiced to the Special Services Department. Transportation for student therapy appointments is booked and invoiced much like a field trip.

The department abandoned its two-way radio system a few years ago. Two-way radios operate by means of a base station and radios installed in each bus. The designated frequency allows only one conversation at a time, and all employees hear the conversation. The department now uses Nextel cellular telephones. These are typically disabled on buses so only the direct-connect feature is available for bus driver communication, functioning much like a two-way radio. The supervisory team has units that operate as telephones. This system allows private conversation between the dispatch office and the driver. The district operates 121 of these communication units. The operational cost is tracked by bus or individual to which the telephone is assigned. The cost ranges from \$12.08 per month during summer months or times of little communication to much higher amounts, depending on the minutes logged on each unit during the month. This system costs more than \$40,000 per year. The operational cost of a two-way radio system would be much less, although the capital cost of the Nextel system is less than the start-up capital cost of a two-way radio system. Operational staff expressed some frustration over the Nextel system and their difficulty connecting with drivers. A cost-benefit study would help determine whether the current system or a conventional two-way radio system would be more beneficial and economical for the district.

Fuel is dispensed at the bus yard, and drivers are responsible for fueling their own vehicles. The fuel use is tracked by an older electronic fuel management system that the district is in the process of replacing. The current system does not integrate with the vehicle maintenance system to track vehicle mileage. Newer systems have this capability, and alert staff when vehicle maintenance is needed. Another benefit of newer systems is that the district can monitor fuel use, and reduce the possibility of theft or inappropriate use.

The department is unsure of the value of its parts and tire inventory. The district has begun using a specialized inventory program, True Course, to track inventory and its value. This program is designed to track warehouse inventory and is not integrated at this time into the district's vehicle maintenance software program, Service Finder. This creates additional work for the staff to document the parts used on each vehicle work order and their cost.

The collective bargaining agreement includes specific work rules for the Transportation Department. One such rule pays drivers for any break that is less than an hour in length. This could be within a route or between a route and a field trip. This can be an expensive work rule, although FCMAT could not quantify the potential cost impact of this practice. Such a calculation would require a great level of detail regarding field trips, pay levels and other cost factors.

Recommendations

The district should:

1. Conduct a cost-benefit analysis of the Nextel communication system.
2. Initiate discussions between the Special Services and Transportation departments to set protocol and procedures relative to the duties, assignment, supervision, evaluation and budget responsibility for bus aides.
3. Initiate discussions with the California School Employees Association (CSEA) bargaining unit relative to reducing the 6.5 hour guarantee for school bus drivers, and to eliminate pay for non-work wait time.
4. Utilize the parts inventory component of the vehicle maintenance software system rather than the warehouse inventory system.

Routing Efficiency

The district transports approximately 915 Special Education students on 52 routes, a ratio of approximately 17.6 students per route. This is a remarkably high number of students per route compared to any other district transportation program that FCMAT has studied. Some of this is due to approximately three tiers of bell time separation at the schools. This means that one bus route can pick up students and bring them to school and have enough time to pick up another group, and then a third, in some cases. The district's Special Education bus routing is extremely efficient.

There is no written Special Services Department procedure relative to requesting transportation service, nor is there a single individual who has the responsibility of forwarding the request to the Transportation Department. Nevertheless, students are scheduled on buses quickly and there appear to be few service concerns from the schools or parents. Sometimes the transportation request form is faxed; sometimes it is e-mailed as an attachment. This disjointed system could result in students being missed and service not initiating when expected. There should be a simple, common procedure for this process. Ideally, the process should flow through a single individual in the Special Services Department who routes the information to the Transportation Department and inputs the information in the student information system.

The Special Services Department handbook includes only one paragraph intended to guide psychologists and staff regarding the need for transportation in the IEP. The direction indicates that a student is only eligible for transportation if they attend a school other than their home school or if the student's disability is such that the student needs transportation to access the program at their school. It states that a student is not eligible for transportation if the parent requests an intradistrict transfer to another school. The direction indicates that the psychologist will complete the Transportation Request Form.

Appendix A is an example of an excellent model transportation request form that includes more information than the form used by the district. The additional information could help the Transportation Department provide better and more specific service. Appendix B is a decision checklist that psychologists could use in the IEP to determine the need for transportation as a related service in the least restrictive environment.

The district routes its Special Education students in a powerful software system called Transfinder. This is a respected school bus routing program. Typically routing systems have various modules that include student databases, mapping programs and logical protocols to link those students on a route that transports them to their school. Although these types of software programs can make the task of routing easier, it is still important to have a good technician who can link these routes together or discover and correct issues prior to a bus driver following the route and making the mistake on the road.

Special Education staff indicated that transportation service is good, and that new students are generally routed within a few days. There were some complaints, however, regarding bus routes that are consistently or systematically late at some schools. The department routes all bus routes to arrive at school prior to bell time. It could be that late buses are not brought to the Transportation Department's attention to correct systemic problems. With Special Education transportation, particularly in a busy urban area, there are often traffic delays, and student or parent needs may affect the timeliness of service.

Fourteen Special Education students have a transportation request to ride a regular home-to-school bus route. This occurs when it is determined that the student does not qualify for a Special Education bus but cannot afford the fees charged to ride a regular education bus. The transportation request is sent primarily to inform the Transportation Department that the student qualifies for a free bus pass. Many other Special Education students may ride regular education buses but the department is not informed that they have an IEP. Since the IEP does not require transportation as a related service, these students would pay the regular fee for home-to-school transportation.

Few district students attend nonpublic schools, and FCMAT found none that include NPS-provided transportation as a part of the NPS contract.

Recommendations

The district should:

1. Clearly articulate the process to request transportation.
2. Enhance the information available on the transportation request form similar to Appendix A.
3. Develop a more thorough decision-making process for the IEP team to utilize to determine if students require special transportation, such as a document similar to that in Appendix B.
4. Ensure that Special Education administrators adhere to a consistent process for requesting transportation.
5. Implement a process to alert the Transportation Department regarding consistently late buses.
6. Consider establishing quarterly meetings between Special Education administration and the Transportation Department to ensure procedural consistency and problem solve any transportation related issues.

Staffing

The department is staffed as follows:

Position Title	FTE
Director of Transportation	1
Regular Education Supervisor	1
Special Education Supervisor	1
Training Supervisor	1
Fleet Maintenance Supervisor	1
Senior Administrative Assistant	1 (assists the director)
Senior Office Assistant	1 (bus passes)
Office Assistant II	1 (shop)
Transportation Operations Technician	1 (field trips)
Fleet/Heavy Equipment Technicians	6
Tool and Parts Handler	1
Bus Drivers	79
Substitute Bus Drivers	13
Bus Aides	13

In the operations area, the regular education supervisor begins work at 5 a.m. and is the only one on duty during this very busy time. The transportation operations technician works from 6 a.m. to 2:30 p.m. That position books over 8,000 field trips for the district per year, and assists in dispatch when necessary. Booking and scheduling this large number of trips is a significant responsibility, and leaves little time for anything else. The special education supervisor works from 10 a.m. to 6:30 p.m. and is the only dispatcher during the very busy afternoon route time. During busy route times it is essential to have a dispatcher in the office to answer phones, communicate with drivers and ensure that all routes are covered. Supervisors who act as dispatchers do not have the opportunity to supervise. When there is an emergency out on the road, the supervisor often must abandon the dispatch office to respond to the event. This should never occur, as it can potentially endanger the safety of students.

A full-time office assistant II inputs work orders and information in the fleet maintenance program, and documents and invoices the vehicle maintenance and fuel for other department vehicles. A full-time tool and parts handler schedules the bus preventive maintenance inspections, orders parts and manages the inventory. The district is just initiating the parts inventory program, as noted above. Most school district shops that handle this type of volume usually have one employee who handles all these duties.

All of the supervisors and mechanics possess commercial driver licenses and valid special certificates to drive a school bus. They drive bus routes when necessary. Although this was not reported to occur frequently, the district should evaluate whether or not it is a productive use of mechanics' time to drive routes rather than perform mechanical work on buses. This might require the district to retain more substitute bus drivers to assist when necessary.

Staff and administrators reported a concern in the Transportation Department regarding excessive absenteeism, particularly on Mondays and Fridays. The chief facilities executive is the cabinet level administrator who oversees the Transportation Department. He has determined that the department has a morale problem and has initiated an effort to work toward stronger teamwork and investment in the department. The program began this year, and several pages of goals have

been developed. The chief facilities executive, along with the transportation director and key department staff, plan to meet regularly to work on these goals.

Department supervisors communicated that the department's management team doesn't seem to work as a team. No regular staff meetings are held to discuss or work on issues. Regular staff meetings could integrate the efforts of the morale initiative.

The Special Education buses are parked at a yard that is several blocks from the transportation facility. Special education bus route drivers report to this yard, but there is no supervision. Supervisors rarely have the time to visit this yard because of their dispatching duties.

Recommendations

The district should:

1. Consider adding a dispatcher position to work a split shift from 5 a.m. to 9 a.m. and from 1 p.m. to 5 p.m.
2. Consider combining the office assistant II and the tool and parts handler duties into one position.
3. Consider the effect of mechanics driving bus routes on shop productivity.
4. Conduct regular department staff meetings and prioritize the initiative to improve department morale.

Driver Training and Safety

School bus driver training and safety is highly regulated in California. Education Code Sections 40080-40089 detail the requirements. The California Department of Education (CDE) has developed a rigorous course of training and certification for school bus driver instructors, as well as the curriculum for school bus drivers. Drivers are required to successfully complete a minimum of 20 hours of classroom instruction and 20 hours of behind the wheel instruction in the type of bus they will drive. Most classroom training programs require approximately 35 hours to properly cover all units in the instruction manual, and behind the wheel training consumes at least as much time. Drivers must receive a minimum of 10 hours of in-service, classroom or behind the wheel training annually. In their last year of special certificate validity, they must receive a minimum of 10 hours of classroom training in specified curriculum units. The training requirements for school bus drivers are the most stringent of any licensed driver in California.

In addition to state-certified school bus driver instructors, the Education Code allows for delegated behind the wheel trainers, who are also certified by the CDE and are trained by a state-certified instructor. They are authorized only to conduct behind the wheel training.

There is only one state-certified school bus driver instructor on staff, and no delegated behind the wheel instructors. The district reports it has not had to provide training for new drivers for many years.

The training supervisor offers a monthly in-service class of approximately 1.5 hours. He reports that few drivers attend this training. The department has not conducted many driver ride-alongs. This is an optimal method to evaluate a driver's abilities and skills and determine if additional

training is necessary. In addition, it would be an important element in the annual employee evaluation.

The transportation director reported and the driver instructor confirmed that few drivers receive any additional training after an accident. From a risk management perspective, post-accident training is a necessity. Although staff reported that a department safety committee evaluates every vehicle accident, no regular procedure exists to ensure that drivers receive remedial training after an accident. Training should occur after every preventable accident and any accident where the school bus driver is at fault.

Many district drivers receive required in-service and renewal training at the Chula Vista Adult School. The district's training supervisor is the instructor for this program and is paid separately for this work. The adult school training occurs after hours and may be more convenient for some drivers. For renewal training, drivers receive a flat stipend of \$150. The drivers pay individually for registration in the adult school classes. Although the training for this program follows the curriculum developed by CDE, drivers may attend the program from a number of other school districts. In-house training is an opportunity to articulate specific work rules and expectations for the district, and build teamwork and morale. Those elements can't be shared when the class is open to drivers from other school districts or contractors. Regular driver training should be provided at the district for its drivers rather than at the adult school.

As a part of the California Highway Patrol's (CHP's) annual inspection of the carrier's terminal, it was determined that driver records were not adequately maintained. At that time, the district did not have a dedicated school bus driver instructor or training supervisor. This highlights the importance of adequate driver training and record-keeping. The training supervisor has revised the district's record-keeping methods. This included current Department of Motor Vehicles (DMV) pull notices. The DMV pull notice is a requirement for motor carriers to register to receive driver record information and activity. Once drivers are enrolled, the district receives current activity records relative to its drivers' moving violations and accidents. In addition, the department previously maintained the DMV pull notice for several drivers in the district who drive trucks that are under the same requirement. The training supervisor reported that these records were moved to the maintenance department. The district also previously enrolled and received DMV pull notices for any staff member that drove students in district vehicles; however, this no longer occurs.

Maintenance of the DMV pull notice records is an important risk management practice for any employee who drives students in district vehicles. In addition, the pull notice requirements fall under the carrier requirements and should be maintained at one location, preferably the Transportation Department.

The Special Services Department has occasionally provided specific bus driver training over the years relative to student disabilities and strategies to mitigate negative, inappropriate behaviors on the school bus. This has not been done consistently. It would be beneficial if such training was provided regularly and the topics were jointly developed by the Transportation and Special Services departments.

Education Code Section 39831.3 requires districts to have a transportation safety plan that covers specific topics. The plan must be located at every school site and be available for inspection by any member of the California Highway Patrol. The district has a comprehensive plan and is in compliance with this regulation.

Education Code Section 39831.5 requires that school bus safety information is distributed and evacuation drills are performed annually for students in grades K-8, and that detailed records are kept for a specified period of time. The district is in compliance with this regulation.

Recommendations

The district should:

1. Consider adding one school bus driver instructor position and having an as-needed delegated behind the wheel instructor on staff.
2. Ensure that a training program is provided consistently throughout each school year to all drivers.
3. Conduct all driver training in-house rather than having drivers attend programs they must pay for at the Chula Vista Adult School.
4. Conduct at least one ride-along evaluation annually of each school bus driver.
5. Ensure that all driver's licenses, special certificates, medical examinations and DMV pull notices are valid and current.
6. Conduct behind the wheel refresher training for any driver involved in a preventable or at-fault traffic collision.
7. Coordinate specific Special Education bus driver training with the Special Services Department.
8. Provide consistent staff development regarding the mitigation of negative behaviors on the school bus transporting Special Education students.

Vehicle Maintenance and Fleet

The district owns 59 Special Education buses and 38 regular education buses. It owns an additional 177 wheeled vehicles (trucks, vans, mowers, trailers, etc.) that the Transportation Department maintains. There are 52 Special Education routes and 27 regular education routes. Eleven spare buses for regular education are available for use when a bus is in the shop or assigned for field trips. There are seven Special Education spare buses. However, very recently, three Special Education buses caught fire in the bus yard. One is a total loss. Two have significant damage. The chief facilities executive indicated that the district has given permission to purchase three replacement buses.

The maintenance department utilizes the Service Finder component of its Transfinder routing software to document vehicle maintenance. Bus inspections and required repairs are completed by mechanics on paper work order forms. Those forms are then input into the software program. This program is only marginally utilized, as the daily mileage component and the vehicle parts inventory are not integrated into it. The mileage could be input either by integrating fueling data, or from daily electronic vehicle inspections completed by the drivers. The software has an integrated parts inventory system.

The district has started to track inventory in a separate warehousing program called True Course. This is unnecessary, and inventory should be input in Service Finder. The transportation main-

tenance department does not generate any reports or useful management information from this powerful software system. The software can track fuel mileage, parts failure and replacement intervals, vehicle maintenance history and costs, tire wear and cost, technician productivity, and related items specific to a vehicle repair. The department should determine what useful management information (reports) should be produced regularly, and use that information to generate data-driven decisions.

The California Highway Patrol Motor Carrier Division inspects every school bus annually. The division also performs an annual terminal inspection and issues a report called the Safety Compliance Report/Terminal Record Update, more commonly known as the terminal grade. This inspection also includes driver records and compliance with federal drug and alcohol testing requirements for commercial drivers. In October 2010, the district received a satisfactory terminal grade. Satisfactory is the highest grade and indicates compliance with laws and regulations.

At that time, however, the CHP issued very clearly worded warnings to the district (see Appendix C). The warnings related to vehicle maintenance records, driver inspection requirements, documentation of those inspections, and driver timekeeping records. The report lists violations of laws or regulations with regard to the district's maintenance program, driver record-keeping and vehicle safety violations pertaining to brakes, steering and suspension and required equipment. In addition, the CHP gave the district a very carefully worded directive to ensure compliance. The district has not sufficiently addressed these serious violations.

On November 3, 2011 the district received an unsatisfactory terminal rating (see Appendix D). It indicated a failure to fully participate in the DMV pull notice program, utilizing unqualified drivers and a failure to maintain drivers' timekeeping records. The report details all of the violations discovered and further emphasizes the need to follow all laws and regulations.

On March 22, 2012 the CHP conducted a terminal reinspection of the driver records only (see Appendix E). The district was issued a satisfactory rating.

The next terminal inspection and report was on May 14, 2013 (Appendix F). Again, the district received an unsatisfactory rating based on a continued failure to fully participate in the DMV pull notice program, and vehicle maintenance violations that placed vehicles out of service.

The areas of concern include the failure to keep required inspection and maintenance records, the failure of drivers to inspect buses daily or to properly document their daily inspection, the failure of the district to maintain proper time records for drivers, noncompliance with the DMV pull notice program, and the failure to inspect buses as required every 45 days or 3,000 miles. Various safety and code violations were detected on buses that were inspected. These issues need to be corrected to ensure student, employee, and public safety.

The district has instituted a new filing system for driver records, and a practice to write a work order for repairing every violation that the CHP discovers. The violations that are noted indicate a systemic issue that requires a systemic response. For example, Title 13 of the California Code of Regulations, Section 1232 requires that school buses are inspected every 45 days or 3,000 miles, whichever comes first. The CHP has indicated that the district does not always maintain this inspection interval. The compliance issue relates to the district's failure to track mileage when fueling or with daily vehicle inspections to determine required inspection dates. A sticker is affixed near the vehicle's odometer that indicates the maximum mileage the vehicle can travel prior to its next inspection. This is not a reliable or accurate method of ensuring that a required

inspection is performed. This issue could be easily addressed by integrating fueling mileage or daily driver inspection mileage into the Transfinder system.

If the issues noted in the CHP terminal grade reports are not addressed, the district could face sanctions. Many school districts in San Diego County have excellent records with the CHP relative to school bus maintenance requirements and these inspections, such as Cajon Valley Union School District. It would be advisable to meet with these districts to evaluate their processes and procedures and adopt their best practices.

It is also essential to build a good relationship with the California Highway Patrol motor carrier inspectors. Open communication regarding their expectations will assist the district with compliance. Further, the CHP offers training through its Commercial Industry Education Program (CIEP). This free, customized training is available to commercial motor carriers on any topic related to Title 13, California Code of Regulations requirements.

Although the district has some buses that are 25 years old, the average fleet age is 10.9 years, which is relatively good compared to many school districts in the state. Most school districts struggle to find the capital resources to fund bus replacements. For a fleet of this size, the district should plan to purchase approximately five replacement buses per year, on average. If the population of students requiring transportation grows, the district should plan to purchase additional buses for fleet augmentation.

Recommendations

The district should:

1. Integrate mileage and parts data into the vehicle maintenance software program to track mileage for inspection intervals, accurately track costs and generate necessary management information.
2. Address every issue raised by CHP Motor Carrier inspectors.
3. Seek training, support and best practices relative to vehicle maintenance by visiting other, local successful school districts, communicating with the CHP and utilizing its CIEP training program.
4. Plan to purchase approximately five replacement buses per year, on average.

Facility

The transportation facility is located at the district office site in a residential area. Administrative offices are upstairs above the shop next to a very small drivers' room. The director, training supervisor and senior administrative assistant work in this area. The senior office assistant who processes bus passes has an office downstairs from the administrative offices. The dispatch area is separated from the administrative offices and is in a small trailer near the bus parking lot. The regular education and Special Education supervisors and the transportation operations technician work in this area. The maintenance shop does not have enough work bays for the number of mechanics on staff. Special education buses are located at a different site with no supervision.

The facility is disjointed and does not allow for regular communication with the employees nor supervision of their work. A very small driver lounge above the shop can only accommodate a

few employees. The district had purchased property on L Street with a general plan to relocate district offices and maintenance, operations and transportation (MOT) functions on this site. The chief facilities executive reported that over time, the perspective of the city has changed due to the economy and the lack of redevelopment dollars, and it appears that this site will no longer be developed. The district is in the process of planning, with an interest in developing a separate district office site, and a separate operations facility that would include a single, adequately sized transportation facility.

Recommendations

The district should:

1. Endeavor to integrate transportation management and operations on the current site until a new, adequately sized facility is constructed.
2. Develop regular communication with employees and provide appropriate supervision of their work.

Nonpublic Schools and Agencies

The district provided FCMAT with its written procedure for determining the need for a student to attend or continue in a nonpublic school (NPS). Staff reported that the procedure is followed, and that the consideration of an NPS is only made after every accommodation and/or modification of the student's program has been attempted and has not been successful. The exception to this is when a student has been placed in an NPS by a feeder district or moves into the district with an NPS placement on the IEP. For the 2013-14 school year the district received 13 new NPS placements through the transition from feeder elementary schools.

The South County Special Education Local Plan Area (SELPA), in conjunction with the other San Diego SELPAs, provides the contracts for the NPS and agency services and the individual service agreements (ISAs) for the students served in an NPS. The contract specifies when the NPS is paid for absences, but does not specify the number of days an NPS can operate an extended school year (ESY) program. Each individual district negotiates with the NPS regarding the number of ESY days.

The invoices for NPS students are usually sent directly to the Special Services Department for review and approval. Staff reported there have been delays in payment when the invoices were sent to the Business Department instead of Special Education. The district's process requires attendance and services to be checked by Special Education for accuracy, the invoices signed by the Special Education director and then forwarded to the Business Department for payment.

The 2012-13 Special Education NPS budget was \$2,590,000, with actual expenditures of \$2,357,370.75. A total of 88 students were enrolled in an NPS during the year, some for as little as a week and some for the full year. Incoming 7th graders accounted for 13 of the 88 students.

The 2013-14 Special Education NPS budget is \$2,705,000. This is an increase of \$347,630 over the 2012-13 actual expenditures and \$115,000 over last year's initial budget. This is because of increases in 2013-14 NPS rates and 13 additional student placements of 7th grade students transitioning into the district with an NPS placement on their IEP. This increase was made in conjunction with the Business Department. However, Special Services and the Business Department do not regularly schedule budget meetings to review the NPS expenditures. Budget meetings could also include the nonpublic agency, independent contractor and educationally related mental health services budgets as well as the nonpublic schools.

The number of ESY days is inconsistent among the nonpublic schools, ranging from 24-50 days. District staff reported they attempted to reduce the number but were unsuccessful. The district operates an ESY program for 20 days, which is within the standard required by California Code of Regulations Section 3043 and 34 Code of Federal Regulations (CFR) 300.346.

Some NPS students will require more than the minimum number of ESY days. Staff reported that the NPSs do not assess students to determine if they qualify for ESY. Every NPS student has the total number of days that the NPS operates an ESY program on their IEP regardless of their individual needs.

FCMAT reviewed the cost for ESY days over the 20-day minimum for nonresidential NPS students. The potential savings for 2013-14 is \$202,771.10. Additional savings would be realized with the reduction in transportation and 1-to-1 instructional aide support.

NPS	No. of Days Over 20	Daily Rate	No. of Students	Total Cost
1	30	\$272.42	2	\$16,345.20
2	10	\$174.54	3	\$5,236.20
3	30	\$204.00	2	\$12,240.00
4	10	\$119.66	4	\$4,786.40
5	10	\$166.20	7	\$11,634.40
6	4	\$146.32	1	\$585.28
7	23	\$194.94	26	\$116,574.12
8	10	\$240.05	12	\$28,806.00
9	10	\$131.27	5	\$6,563.50
Total				\$202,771.10

Source: Individual service agreements by student/school 2013-14

Staff reported that the initial IEP for NPS placement does not include clear goals and a transition plan to return the student to a district program. Discussions may be held at future IEP meetings regarding the student's return, and are documented, but not with goals and a defined plan. Staff also reported that although some students have been identified as appropriate for a district program, district limitations prevent this from happening. Additional teaching staff and instructional aides may be required, a behavior specialist or additional time from a school psychologist for developing, monitoring and supporting behavior plans may be needed, and in some cases a more secure environment may be required.

Alternative Programs

The district developed East Hills Academy as an alternative program to an NPS, and reported it has reduced the number of students in NPS. Staff also reported that students who attend the East Hills program can be mainstreamed into other district schools, with the goal of exiting the students to a less restrictive program.

The East Hills Academy staff is in the process of observing every district student enrolled in an NPS placement to determine if the student could be placed in the East Hills program. If appropriate, the NPS and parents are notified that the student may be considered for the district program, a parental visit to the program may be arranged, and an IEP meeting scheduled.

East Hills Academy has nine teachers. The average caseload is eight students. Twenty-six 8 hour and one 7.5 hour instructional assistants are assigned to this program. Using average staff salaries, the cost for the 74 students who attend East Hills is approximately \$2,588,000, including all statutory and health and welfare benefits. The cost of the physical plant operation was not included, nor was transportation to East Hills.

The cost for 74 students to attend an NPS was calculated using the average daily rate for the two NPSs that would most likely serve the students currently at East Hills. Transportation and additional costs such as 1-to-1 aides were not included. Both programs were calculated at the base school year of 180 days. Based on the staffing information below, the East Hills program is \$308,737 less costly to the district than an NPS program annually for the current 74 students.

Three factors could increase the base costs of an NPS program over district program costs:

1. Transportation costs
2. Additional costs for 1:1 aides
3. Extending the number of days for the extended school year

East Hills Academy Staffing Costs

Teacher	9	\$91,171*	\$820,539
Psychologist	1	\$117,971	117,971
Health Aide	27	\$44,266	\$1,195,182
Related Services	1.5	\$91,171	\$136,757
Administrator	1	\$166,759	\$166,759
Admin. Assistant	1	\$100,898	\$100,898
Total			\$2,538,106

*Source: District-provided data - 2013-14 average salary includes 20% contract increase for each teacher.

Cost of 74 Students in an NPS 180-Day Program vs. East Hills Academy

# of Students	Daily Rate	# Days	Cost at an NPS	Cost at East Hills	Difference
74	\$217.50	180	\$2,897,100	\$2,538,106	-\$358,994

Source: Individual student agreements 2013-14

The district asked FCMAT to determine if there would be benefits to developing additional programs to serve students now in NPS placements.

District staff reported that to return 8-10 NPS students to either the East Hills program or to another site, additional staff would be necessary. One teacher and three aides would be needed for each class. Other support staff or additional administration may not be required depending on the site, the current staffing at that site, and the students' level of need. Using average salaries, the district's staffing cost for one teacher and three aides would be \$223,969, including statutory and health/welfare benefits. Using an average daily rate and 180-day year for eight students in an NPS, the cost to the district is \$313,200. There is a potential savings of approximately \$89,231 if eight students were in a district program instead of an NPS.

NPS Daily Rate	NPS program – 8 students	District program - 8 students	Difference
\$217.50	\$313,200	\$223,969	\$89,231

Source: Individual Service Agreements 2013-14

The district also provides the educational program at a level 12-14 residential facility, Alta Vista Academy. If the district did not run this program, most of the 52 students would be in an NPS placement. The district uses a contracted agency, New Alternatives, to provide the behavioral aides for this program. The agency hires and trains the aides in behavioral techniques, which

includes restraints. The agency also is responsible for any workers' compensation issues. The district's annual contract for those services is \$1 million. The contracted staff also provides coverage, outside the district contract, to the facility's residential side.

The educationally related mental health services (ERMHS) budget includes \$920,300 for the New Alternatives contract. Using the ERMHS money for these services significantly reduces the district's cost to provide the Alta Vista Academy program.

The Alta Vista Academy has nine teachers with a total special education caseload of 31. Fifty-two students attend the academy. The entire cost of the educational program is included in the special education budget. Based on average salaries of the Alta Vista Academy's 10.5 certificated staff, administrator, and 1.5 clerical support, the cost of the program to special education is approximately \$1,214,000. However, 40% of the students in the program are not in special education; therefore, the special education portion of the teachers, administrator and clerical staff is closer to \$728,400.

Using the same NPS average fee as for the East Hills Academy calculations, not including transportation or additional fees for 1-to-1 aides or related services, the cost for 31 students in an NPS at \$217.50 would be \$1,213,650.

The cost for the Alta Vista Academy Special Education students is \$485,250 less than it would cost the district to send those students to an NPS for 180 days per year.

Nonpublic Agencies and Independent Contracts: (NPA and IC)

The Education Code requirements for nonpublic agencies (NPAs) are now the same as those for NPSs. Specifically the Education Code requires that an NPA:

... be under contract with the local educational agency to provide the appropriate Special Educational facilities, Special Education, or designated instruction and services required by the individual with exceptional needs if no appropriate public education program is available. (Education Code 56365(a))

The district provided FCMAT with a written procedure for determining the need for an NPA or independent contractor (IC). Staff reported that the procedure is followed and that contracting with an NPS or IC rarely occurs except for translation or interpreter services. The NPA and IC budgets confirm this information. Additional costs may be incurred during the school year such as independent assessments, additional translation services or other agency services as a result of a mediated agreement.

NPA/IC Budgets for 2012-13 and 2013-14

NPA or IC	Contract 2012-13	Contract 2013-14	Fund Source
Calico Software	\$45,000	0	Special Education
Deaf Community Services	\$450,000	\$450,000	Special Education
Diga-Lo	\$5,000	\$5,000	Special Education
G. Green	\$4,000	0	Special Education
New Alternatives	\$1,000,000	\$1,000,000	\$920,300 ERMHS/\$79,700 Special Education
T. Swanson	\$45,000	\$45,000	Special Education
Children's OT Services	NA	TBD	Special Education
Coast Music Therapy	\$987.50	\$1,500	Special Education

NPA or IC	Contract 2012-13	Contract 2013-14	Fund Source
Dependable Nursing	\$30,785.25	\$520	Special Education
EBS Staffing	\$26,308.10	0	Special Education
Employment & Community Options	NA	\$2,580	Grant Award
Family Guidance & Therapy	\$450	0	ERMHS
D. Plotkin	\$10,550	0	Special Education
San Diego Center for Vision	\$7,709	\$4,000	Special Education
South Bay Community Services	\$331,167	\$400,000	ERMHS

Source: Individual Service Agreements 2013-14

The current budget contains three major cost items. The first is the contract with New Alternatives to provide behavioral assistants at the Alta Vista Academy as discussed earlier in this report. That contract is for \$1 million, of which \$920,300 is paid through ERMHS revenue.

The second is \$450,000 for interpreters for the deaf. The district reports it has made several attempts to hire interpreters for the deaf, including increasing the salary scale, without success.

The third area is \$400,000 for therapy services. This expenditure is also included in the ERMHS revenue.

The budget for NPA and IC contracts can fluctuate during a school year because students move into the district, additional services are identified for current students, mediations are held, etc. The budget meetings discussed earlier in this section between Special Education and Business should include NPA and IC budget changes.

Educationally Related Mental Health Services (ERMHS)

Additional costs of mental health and residential services have transferred to school districts through Assembly Bill (AB) 114, which was signed into law on June 30, 2011. Under AB 114, several sections of Chapter 26.5 of the 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 revenue that the district receives under ERMHS is received and distributed by the South County SELPA in two categories, federal and state. For 2013-14, the South County SELPA estimates the district will receive \$2,738,035 in ERMHS revenue. The district has developed a budget for these funds that includes:

Projected Residential Placement Room and Board and Therapeutic Services	\$501,260
Life Schools Therapeutic Services	\$273,000
South Bay Community Services at East Hills and Comprehensive Sites	\$423,717
New Alternative Staff at Alta Vista Academy	\$920,300
Other therapeutic services at comprehensive and sites and NPSs	\$201,400
Total	\$2,319,677
Total Revenue	\$2,738,035
Balance remaining	\$418,358

If additional residential placements occur during a school year, the current budget may not be sufficient.

Recommendations

The district should:

1. Monitor all NPS referrals to ensure that district procedure has been followed.
2. Continue using the SELPA NPS/NPA contract.
3. Review the process for invoicing with all NPS providers so the invoices are sent directly to Special Education for review and signature.
4. Monitor the NPS contracts to ensure they stay within the budgeted amount.
5. Schedule regular meetings with Special Education and Business to review the NPS/NPA/IC and ERMHS budgets.
6. Establish an assessment process with each NPS, similar to that used by the district, to determine if an NPS student qualifies for ESY.
7. Continue discussions with the South County SELPA regarding the number of days that an NPS operates an ESY program. Determine if language can be included in the NPS contract to give the member districts greater ability to limit the number of days to what the student requires.
8. Develop procedures to ensure that the initial NPS IEP, and all future IEPs, include goals and a transition plan to return the student to a district program.
9. Determine how many district students in NPS placements could be returned to a district program either at East Hills Academy or at another site, and what additional supports and staff may be needed.
10. Continue using the contracted agency, or a similar agency, to provide the behavioral assistants at the Alta Vista Academy.
11. Review the actual cost of providing the special education services at Alta Vista and determine if the special education budget should be adjusted to reflect that cost.
12. Monitor all NPA and IC referrals to ensure that district procedure has been followed.
13. Continue recruiting for district employed interpreters to reduce the reliance on IC services.
14. Continue the current distribution of the ERMHS revenue and monitor increases in residential costs that would affect the budget.

Instructional Aides

Staff reported that 1-to-1 aides are only requested when absolutely necessary. The district has a general guideline regarding adding 1-to-1 aides but has not developed forms to determine the need and substantiate the request. The SELPA has several examples of forms that are available to the district. They include observations, data collection, an independence plan, a flow chart, and a school day analysis. The school day analysis enables an IEP team to determine if and when during a school day a student needs additional support, and if there are natural supports or other staff available that may mitigate the need to add support either for the student or for the classroom. Natural supports occur when students receive assistance from other students or staff who are already assigned to or in the classroom.

Mandatory training for administrators and general and Special Education staff is the best practice to ensure these types of guidelines are followed.

Guidelines can help staff determine the following:

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

Whenever a 1-to-1 or additional classroom support aide is included in a student's IEP, it is important to have goals for reducing and/or eventually eliminating the additional support and a fading plan to increase a student's independence. Staff reported this is not occurring, although the continued need for additional support is discussed at the annual IEP team meeting. Having goals and a fading plan in the IEP ensures that all staff, the family, and the student work toward the same goal of independence and student success.

The district psychologists determine the need for a 1-to-1 aide, make the request through the Personnel Action Request (PAR) form, hire and evaluate the aides. They are required to notify Special Education and Human Resources when a 1-to-1 aide is no longer needed.

The district has no guidelines or procedure manual for any of the instructional aides. Staff reported that in some cases the 1-to-1 aide does not assist other students even when their student is absent. Staff also reported that many of the 1-to-1 aides are not trained, have attendance issues and are texting or making phone calls during work time.

A procedural manual could provide specific expectations of all aides, including that aides are not to work exclusively with one assigned student or how aide support could be provided by various staff. A lack of standard procedures causes inconsistencies between Special Education programs.

All instructional aide staffing was reviewed. Special Education has formulas for assigning aides to nonsevere and severe programs. The psychologists at the high schools hire, assign and evaluate all aides. At the middle schools, the psychologist collaborates with the site administration in aide hiring and evaluation, and is responsible for assigning the aides.

Staff reported that aides are assigned to schools in two ways. The resource specialist allocation of 80% is used to determine the number of aides assigned to the resource and mild/moderate programs at each site. Education Code 56362 (f) states that, “At least 80 percent of the resource specialists within a local plan shall be provided with an instructional aide.” The understanding is that aides are not necessarily assigned to one teacher, but to the department.

The assignment formula for moderate and moderate/severe classes is based on caseload and class designation. Moderate classes may have either instructional aides (IA) or instructional health care assistants (IHCA) assigned. Moderate/severe classes have IHCAs. Classes with up to 15 students have two IHCAs with an additional IHCA if the class load is higher. Classes for students with emotional disturbance are assigned one to two IAs. The various designations add complexity to the review of aide assignments.

Each school was reviewed to determine if the formulas are adhered to as reported. The calculation was done based on classroom assignments. The data for this calculation was provided on August 29, 2013 by Special Education and is a snapshot of the staffing at that time.

Most of the IAs are 6 hour aides, but some are 6.5, 7, 7.5 and 8. Most of the IHCAs are 7.5 hours, but some are 8 hours. Additional hours affect the formula, but for this calculation it was assumed that all IAs are 6 hours and all IHCAs are 7.5 hours.

The two academies, East Hills and Alta Vista, the learning center aides, and aides assigned to visually impaired students were not included in this table due to the unique nature of those programs.

It should not be inferred from the following table that all classes listed as over the formula could have aide reductions, nor that the 1-to-1 aides are not needed. Specific criteria and documentation would be needed for each class and each site to make this determination. This data is provided for discussion and to determine if the district should conduct a more detailed analysis of all aide classifications and hours. Contractual and program issues will need to be included in these discussions.

Number of Aides Assigned Compared to the Assignment Formula

School	Staffing (Cert. Teacher FTE)	Aides	At, over or under formula	Number 1-to-1 aides
Bonita Vista High	6.8 -NS*	7	Over	4
	1 - MOD*	3	Over	0
	7- MS*	18	Over	6
Bonita Vista Middle	3.6 -NS	3	At	4
	1 -MOD	2	At	0
	2- MS	6	Over	1
Castle Park High	6.8 - NS	6	At	3
	1-Mod	2	At	0
	3 - MS	6	At	4

Castle Park Middle	4.8 -NS	5	Over	0
	1 -MOD	2	At	1
Chula Vista High	10.8 -NS	9	At	1
	1-Mod	2	At	0
Chula Vista Middle	5 - NS	4	At	0
Eastlake High	7-NS	7	Over	7
	4 - MOD	7	Under	6
	2- MS	6	Over	0
Eastlake Middle	5-NS	4	At	2
	1 -MOD	1	Under	2
Granger Jr. High	4.4 -NS	5	Over	0
	1-MS	2	At	1
Hilltop High	6.2 - NS	7	Over	2
	1 -ED	1	Under	0
	4-MS	7	Under	5
Hilltop Middle	4.8 -NS	4	At	1
	1-ED	2	At	0
	1-MOD	1	Under	1
	1-MS	1	Under	2
Montgomery High	6.8-NS	6	At	1
	1.8-MOD	4	At	0
	3 - MS	5	Under	4
Montgomery Middle	3.8-NS	2.5	Under	2
	1-MOD	1.5	Under	1
	1-MS	2	At	2
Mar Vista High	6-NS	6	Over	1
	1-ED	1	Under	0
	2-MS	4	At	4
Mar Vista Middle	3.8- NS	4	Over	2

	I-ED	1	Under	0
	I-MOD	3	Over	0
	I-MS	2	At	0
National City Middle	3.2-NS	3	At	0
	I-Mod	2	At	0
Olympian High	6.8-NS	5	Under	4
	2-MS	2	Under	5
Otay Ranch High	9.8-NS	7	Under	2
	I-ED	1	Under	0
	I-MOD	2	At	1
	3-MS	7	Over	7
Palomar High	5-NS	4	Under	0
Rancho Del Rey Middle	5-NS	5	Over	3
	2-MS	4	At	2
SAILS	.8-NS	2	Over	0
Southwest High	5.4-NS	6	Over	1
	I-MOD	3	Over	1
	2- MS	4	At	1
Southwest Middle	3-NS	3	Over	0
Special Services (STEP)	2-MS	4	At	0
Sweetwater High	10.9-NS	10	Under	2
	.5-MOD	1	Over	1
	2-ED	4	At	0
	4-MS	9	Over	3
San Ysidro High	8.6-NS	8	At	2
	I-MOD	2	At	1
	4-MS	10	Over	4
Total number		280		110

*NS - Nonsevere

*MOD - Moderate

*MS - Moderate/Severe

Twenty-six of the 110 1-to-1 aides are assigned to two or more students. Seventy-one of the aides are IHCAs, and 14 of the 71 are assigned to nonsevere programs.

IHCAs are 7.5 hours per day by contract. The job description for an IHCA aide states, “The job of IHCA is done for the purpose/s of assisting in the supervision and instruction of severely special needs students ... by providing for special health care needs.”

Assigning 1-to-1 aides as IHCAs increases the district cost, and at this time there may not be sufficient documentation to justify that classification or number of hours. When a 1-to-1 aide is assigned to a moderate/severe class, it is automatically a 7.5 IHCA aide. If the IHCA 1-to-1 aides were assigned at 6 hours, the district could save approximately \$628,479, including statutory and health and welfare benefits.

Of the 280 aides assigned to classrooms, 130 are IHCAs. This classification has a greater impact on the Special Education aide budget than 1-to-1 aides. If there were no reductions in the total number of aides, but all IHCA classroom aides were assigned at 6 hours, the potential additional savings would be \$1,151,737, including statutory and health/welfare benefits.

Ten of the learning center aides were not included in the above data. The learning center teachers are Special Education teachers who can have a maximum Special Education caseload of 28. Learning center teachers can see up to 50 students. Just over 50% of the students seen in the learning centers are in Special Education. Seven of the 10 aides are funded through Special Education.

District staff reported that the PAR form for all instructional assistants is usually completed and signed by the school psychologist. The PAR is sent to Special Education for review and signature. However, it was reported that PARs are sometimes sent directly to Human Resources. Further, it was reported that aides have been assigned additional hours without either Special Education or Human Resources knowledge or agreement.

While the request for the PAR is in process, the school psychologist can request a substitute aide for up to two weeks. Special Education is not required to approve this temporary position, although it affects the Special Education budget. This short term assignment can be extended if the PAR is still being processed or the position has not been filled, again without Special Education’s approval.

Staff reported that Human Resources, Business and Special Services are not always in agreement as to where aides are assigned, their hours, additional hours assigned, and which positions are vacant. The three departments do not meet regularly to reconcile staffing. Staffing has a significant effect on the Special Education budget, and inconsistencies between the departments can result in inefficiencies and duplications.

Instructional aides have received training in autism. At some schools, the school psychologist provides staff development to the instructional aides, who are also invited to attend the school’s general education curriculum trainings. Staff reported that during minimum days most aides are in a Special Education classroom and leave early at some sites. The responsibility for aide activities on minimum days is not consistent throughout the district.

Staff reported that many of the aides do not have the skills required for their position, particularly substitute aides. A potential substitute is not given specific student information until they have accepted the position. Staff reported that aides have been assigned to visually impaired, deaf or medically fragile students without the understanding or training to work with those students. How the individual school site assigns substitute aides varies. Some sites adjust other aides’ assignments to cover the vacant position while others leave the substitute aide in the assigned position regardless of the aide’s skills.

Guidelines and a procedural manual, as discussed earlier, will help all aides to be more effective in their assignments. Additional training in behavioral techniques, disability awareness and curriculum may help reduce the number of additional classroom support aides or 1-to-1 aides required. The minimum days offer an opportunity for aide training without incurring additional cost to the district. Substitute aides could attend minimum day trainings at their assigned site without additional cost to the district.

Recommendations

The district should:

1. Obtain forms and procedures from the South County SELPA for determining the initial and continued need for 1-to-1 or additional classroom support aides, and adapt those forms to meet the needs of the district. Train administrators and general and Special Education staff in usage of the aide staffing guidelines.
2. Ensure that every IEP that provides a student with a 1-to-1 aide or additional classroom support has goals for independence and a fading plan.
3. Review documentation that was provided to Human Resources when a 1-to-1 aide was no longer required at a site to validate or invalidate the perception that they continue at sites when no longer required.
4. Develop guidelines and/or a procedure manual to ensure that all 1-to-1 aides have the same information regarding expectations of their assignment, district policies, and practices regarding student and aide absences.
5. Determine if the current aide assignments, including base hours, additional hours, and classification are within the Special Education formula, and why they are not, if applicable.
6. Begin discussions regarding any contractual issues if it is decided to review aide classification, hours and assignments.
7. Review the funding streams for the Learning Center aides, and ensure the aides are charged to the correct funding source.
8. Ensure that all sites have written procedures regarding the PAR process and that all PAR requests are sent to Special Education for processing.
9. Review the impact on the Special Education budget regarding the practice and procedures of adding temporary extra hours to aides' assignments and providing short-term substitutes while a PAR is being processed.
10. Schedule quarterly meetings with Special Education district staff and psychologists to review aide assignments including extra hours.
11. Schedule monthly or quarterly meetings with Human Resources, Business and Special Education to ensure that staffing information aligns among all three departments.
12. Develop a systematic staff development plan for all aides at each site during the minimum day.

Administrative Support Structure

FCMAT was asked to compare the Special Education administrative structure and support staff with districts of comparable size and make recommendations for greater efficiency.

The table below indicates the administrative structure and support staff assigned to the Special Services Department. Eight administrative assistants or secretaries are assigned to the school psychologists. Their duties include but are not limited to assisting with the scheduling of IEP meetings, generating and sending meeting notices, sending reports and providing support to multiple sites. Some administrative support staff are located at the sites and some at the district office. School psychologists provide input for their evaluations.

Special Education Administrative Staff

Administrator Support	FTEs
Special Services Director	1.0
Program Manager	2.0
Support Staff	
Sr. Administrative Assistant	1.0
Administrative Assistant	2.0
Registrar	1.0
Sr. Office Assistant	1.0
Office Assistant	1.0

Note: All school psychologists also provide administrative support to Special Education programs and are supported with nine of the administrative staff support positions.

The district’s organizational structures were compared to one high school and two K-12 school districts of comparable size. Information was gathered from the districts’ websites and from Ed-Data, a partnership of educational agencies. Ed-Data compiles its reports from fiscal, demographic and student performance data collected by the California Department of Education. Other similar-size districts did not include Special Education staffing information on their website and so were not used for comparison.

Comparison of Program Administrators, Program Specialists and Clerical Staff

District	Enrollment	Director/Manager	Supervisors/Program Specialists	Clerical Staff
Kern High SD	37,505	1 Manager 1 Director	6 Program Supervisors 3.2 Program Specialists	7
Moreno Valley	35,690	1 Executive Director	5 Program Specialists	8
Sacramento City	47,939	1 Director	2 Supervisors 3 Program Specialists	11
Sweetwater	40,916	1 Director	2 Program Managers 19 School Psychologists	8

Source: Ed-Data and district websites

Essentially, the district is comparably staffed to other districts of its size. It has a similar designation of 1 FTE for program director and the average of 2 FTE in program managers (also called supervisors or principals in other districts) to comparable districts. The district has 19 FTE psychologists assigned to support the Special Education programs and services for roughly 50% of their time; they function as school site psychologists the other 50% of their time. The average

clerical support level for districts of comparable size is 9 FTE; the district's clerical support is 8 FTE.

Recommendation

The district should:

1. Re-evaluate the dual role of the school psychologist and ensure that the area of assessment and school/program support is served efficiently.

Programs and Services

The district provides students with a comprehensive range of programs and services that meets the requirements of the Individuals with Disabilities Education Act (IDEA). These services are available through the district, South County SELPA and nonpublic schools and agencies.

The district requested FCMAT to analyze the costs and services offered to disabled students to determine whether they meet or exceed the levels mandated by federal law. FCMAT found instances in which the district's staffing exceeds the level of service or support required by federal or state law. Its contract with certificated staff provides a salary increase equal to .20 FTE when teachers exceed the caseload maximum under certain circumstances or teach on prep period. This costs the district approximately \$775,928 per year.

Teachers are not required to schedule their own IEP meetings as part of their case manager responsibilities. In most districts, the classroom teacher is the case manager and is required to schedule the IEP meetings. Sweetwater UHSD assigns this responsibility to the school psychologist.

Each Special Education teacher has nine release days to complete paperwork and conduct annual and triennial IEPs for their students. This is not required by the Education Code or federal law and costs the district approximately \$250,000 per year.

Many districts design staffing structures around their unique needs. While the district exceeds the staffing mandates required by law, no statutory requirements are violated.

Program Costs That Exceed the Mandated Level of Service

Staffing Area	Annual Excess Cost
Each teacher/specialist teaching on prep period and/or exceeding caseload receives an additional 20% salary increase	\$447,714
Each teacher/specialist receives 9 days release time for IEP preparations and meetings	\$250,000
RSP caseloads at middle school below statutory requirements	\$261,166
RSP caseloads at the high school level below statutory requirements	\$716,342
District class size below established state guidelines	\$164,107
District increases teacher salaries at East Hills Academy by 20%	\$164,107
Seventy-one positions assigned 7.5 hours per day to 1-to-1 student support as instructional health care assistants without sufficient documentation of need	\$1,151,737
Total	\$3,155,173

Recommendation

The district should:

1. Examine its excess staffing costs and continue to provide programs and services at the mandated level.

Appendices

Appendix A - Model Transportation Request

Appendix B - Decision Checklist

Appendix C - October 2010 CHP Terminal Report

Appendix D - November 2011 CHP Terminal Report

Appendix E - March 2012 CHP Terminal Report

Appendix F - May 2013 CHP Terminal Report

Appendix G - Study Agreement

Appendix A

- Special Education
- 504
- No Child Left Behind

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

- Start _____
- Change _____
- Continue _____

TRANSPORTATION REQUEST

PLEASE PRINT CLEARLY

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

REASON OR TRANSPORTATION

- Placement away from Home School
- Student Disability

Signature (Special Education/Health Services) _____ Date _____

PARENTAL RELEASE SIGNATURE

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

Parent Signature _____ Date _____

EMERGENCY POINTS OF CONTACT AND RESPONSIBLE PARTIES

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

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

Appendix B

Special Education Transportation Chart/Checklist

Student's Name:

<p>STEP 1: Unique Needs that May Require Special Education Transportation: ___ Does disability make it problematic for student to get to school in same manner as non-disabled peers? Explain.</p>	<p>If it is problematic to get to school in same manner as non-disabled peers, this is a factor in favor of special education transportation.</p>
<p>___ Are same age peers expected to walk by themselves or take public transportation? Explain.</p>	<p>If same age peers are expected to walk by themselves or take public transportation, can this student also be expected to do this? Explain.</p>
<p>___ Does student have significant limitations in strength, vitality or alertness that prevent him/her from riding the regular bus? Explain:</p>	
<p>___ Does student's medically fragile condition prevent him/her from riding the regular school bus? Explain</p>	
<p>___ Does student need special medical equipment that must be transported on a specialized school bus? Explain</p>	
<p>___ Is there physical access for student to the curbs, sidewalks, streets and public transportation? Explain.</p>	
<p>___ Is distance from student's home to school so far or remote that it requires specialized transportation arrangements? Explain.</p>	
<p>___ Does student have a wheelchair requiring special securement system on school bus? Explain.</p>	
<p>___ Visual impairment prevent him/her from riding regular school bus? Explain.</p>	
<p>___ Hearing impairment prevent him/her from riding regular school bus? Explain.</p>	
<p>___ Does student's disability or level of functioning prevent him/her from being able to travel to school independently? Explain.</p>	
<p>___ Does student's disability or level of functioning prevent him from being able to travel to and wait independently at a regular school bus stop? Explain</p>	
<p>___ Does pupil have the capacity to arrive at school on time, avoid getting lost, avoid dangerous traffic and avoid other potentially dangerous or exploitive situations on way to and from school? How does this capacity compare to same aged non-disabled peers? Explain.</p>	

<p>___ Does student have behavior plan that requires certain transportation services so severe that he/she cannot ride the regular school bus? Explain.</p>	<p>Can Behavior plan be implemented while being transported on regular school bus?</p>
<p>___ Is student serviced at home school?</p>	
<p>___ Does student's unique needs require him to attend a special education program outside of district's geographical boundaries?</p>	
<p>___ Does student's unique ESY needs require specialized transportation?</p>	
<p><u>STEP 2: IEP Team decides whether Student is able to ride the regular bus and/or walk/bike to school without the need for accommodations.</u></p>	
<p>[Walk/Bike Analysis] ___ Is student in walking/biking distance to school? (Follow District policy of regular ed bus for students who live further than 1 ¼ miles from school [K-5], 3 miles [6-8 grade] and 7 miles [high school].) ___ Is student's same aged non-disabled peer able to walk self to school? [Note: If five year old lives one mile to school, he/she cannot walk him/herself to school but no regular ed transportation is provided. So, if there is not a unique need for this special education student to get transportation as a related service, the special education student would need to be walked/driven/biked by an adult just as a non-disabled peer.] [Regular Bus Analysis] ___ Can student ride regular school bus without behavioral interventions? ___ Can student get to/from bus stop in a similar manner and as safely as same age nondisabled peers?</p>	
<p><u>STEP 3: If student lives within 1 ¼ miles from school [K-5], 3 miles [6-8th grade] or 7 miles [high school] and has unique needs that prevent him from walking self or taking public transportation to school (same as like age non-disabled peers), then IEP team should discuss whether student is capable of taking regular education transportation without accommodations?</u> ___ yes or no If yes, then student's IEP should reflect that he/she will be provided with regular education bus</p>	

<p>transportation without accommodations, if available (despite living a closer to school).</p> <p>If no, go to STEP 4.</p>	
<p><u>STEP 4: If student cannot ride the regular bus without accommodations, the IEP team needs to determine if the student can ride the regular school bus to school with accommodations.</u></p> <p>___ Possible accommodations [to be indicated on IEP] on bus include special seating arrangements, behavior interventions, special reinforcers, encourage replacement behaviors, additional adult supervision (aide on bus), restraint, or regular bus picks student up at street address or door in lieu of regularly designated bus stop.</p>	
<p><u>STEP 5:</u> If student is unable to ride the regular bus with accommodations, the IEP team shall include specialized transportation on the IEP. Specialized transportation should be described in sufficient detail to inform parties how and where transportation will be provided and details of reimbursement to parent, if applicable.</p> <p>___ Consult representation of District’s Transportation Department, if needed.</p> <p>___ Identify type of transportation to be provided [see below “terms” and “definitions” for uniform system]</p> <p>___ Determine whether student has any unique needs that necessitate an approximate time limit for length of time on bus.</p> <p>___ Identify any special arrangements or instructions on the IEP and communicate those needs to the District’s Transportation department.</p>	
<p><u>Term</u></p>	<p><u>Definition</u></p>
<p>1. Point to point</p>	<p>Home to school and school to home. “Home” is identified by parent and can be a child care location if within the district boundaries. Must be a consistent location unless other arrangements are approved by the District. Point of pickup is safest location in proximity to “home”.</p>
<p>2. Point to Point, unsupervised</p>	<p>See #1 but no supervision required at point of pickup or point of delivery. Student can wait for pickup, unattended. Student can travel from bus to classroom or school based location unattended.</p>
<p>3. Point to Point, supervised</p>	<p>See #1 but child is under parent supervision at</p>

	time of pickup. Child can walk to bus while parent is watching from home. At school delivery, school staff maintain observation of child but do not need to provide physical attendance.
4. Hand to hand	See #1 but parent responsible for supervision at pick up. Delivers child to bus door. School staff responsible for meeting child at bus. Driver releases child to school staff who then accompany child to class or other school based location.
5. Bus attendant (Rider)	Per IEP team, for student safety and/or health, a school employee accompanies student on bus to monitor and/or implement a health protocol or behavior plan.
6. Safety support (specify)	Use of lap belt, harness, safety vest, lap belt lock, or other specialized equipment to ensure student stays in seat and travels safely. Driver can secure child in the needed support equipment.
7. General transportation	Not specialized transportation. This transportation is that form provided to any child living in District boundaries in accordance with BP/AR transportation standards.
8. School to school transportation	Due to special education placement at a school other than school of residence, student is transported from school of residence to school of service. (Student must be able to safely travel from home to school of residence or other designated pick up location identified by Transportation.)

APPENDICES
Appendix C

STATE OF CALIFORNIA DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
SAFETY COMPLIANCE REPORT/TERMINAL RECORD UPDATE
 43 (Rev 6-10) OPI 062

Page 1 of 22 pages

NEW TERMINAL INFORMATION
 CA NUMBER: 49255 FILE CODE NUMBER: 116863 COUNTY CODE: 37 BED: 1/25/2008
 TERMINAL TYPE: Yes No
 CODE: S OTHER PROGRAM(S): 1 LOCATION CODE: 645 SUBAREA: 01
 Truck Bus

TERMINAL NAME: Sweetwater Union High School District
 TELEPHONE NUMBER (W/ AREA CODE): (619) 691-5527
 TERMINAL STREET ADDRESS (NUMBER, STREET, CITY, ZIP CODE): 1130 5th Ave., Chula Vista, CA 91911-2812
 MAILING ADDRESS (NUMBER, STREET, CITY, STATE, ZIP CODE) (IF DIFFERENT FROM ABOVE): Same As Above
 INSPECTION LOCATION (NUMBER, STREET, CITY OR COUNTY):

LICENSE, FLEET AND TERMINAL INFORMATION

HM LIC NO: HWT REG NO: IMS LIC NO: TRUCKS AND TYPES: 2D TRAILERS AND TYPES: 2F BUSES BY TYPE: I- 96 II- 2 DRIVERS: 111 BIT FLEET SIZE: 4
 EXP DATE: EXP DATE: EXP DATE: REG CT: HW VEH: HW CONT: PPB / CSAT: Yes No

CONSOLIDATED TERMINALS: Yes No
 FILE CODE NUMBER OF CONSOLIDATED TERMINALS AND DIVISION LOCATIONS BY NUMBER (Use Remarks for Additional FCNS):

EMERGENCY CONTACTS (In Calling Order of Preference)

EMERGENCY CONTACT (NAME): Chris Olsen DAY TELEPHONE NO. (W/ AREA CODE): (619) 691-5527 NIGHT TELEPHONE NO. (W/ AREA CODE): (619) 691-5527
 EMERGENCY CONTACT (NAME): DAY TELEPHONE NO. (W/ AREA CODE): NIGHT TELEPHONE NO. (W/ AREA CODE):

ESTIMATED CALIFORNIA MILEAGE FOR THIS TERMINAL LAST YEAR [2009]

A	B	C	D	E	F	G	H	I
UNDER 15,000	15,001 - 50,000	50,001 - 100,000	100,001 - 500,000	500,001 - 1,000,000	1,000,001 - 2,000,000	2,000,001 - 5,000,000	5,000,001 - 10,000,000	MORE THAN 10,000,000

OPERATING AUTHORITIES OR PERMITS

PUC: T TCP: PSC: MC: MX:
 US DOT NUMBER: MOTOR CARRIER OF PROPERTY PERMIT ACTIVE: Yes No N/A
 REASON FOR INSPECTION: IMS FITNESS EVALUATION: Yes No

Annual Terminal Rating

INSPECTION FINDINGS	INSPECTION RATINGS: S = Satisfactory U = Unsatisfactory C = Conditional UR = Unrated N/A = Not Applicable
REQUIREMENTS VIOL	HAZARDOUS MATERIALS
HAZARDOUS MATERIALS	HAZARDOUS MATERIALS
DRIVER RECORDS	HAZARDOUS MATERIALS
DRIVER HOURS	HAZARDOUS MATERIALS
BRAKES	HAZARDOUS MATERIALS
LAMPS & SIGNALS	HAZARDOUS MATERIALS
CONNECTING DEVICES	HAZARDOUS MATERIALS
STEERING & SUSPENSION	HAZARDOUS MATERIALS
TIRES & WHEELS	HAZARDOUS MATERIALS
EQUIPMENT REQUIREMENTS	HAZARDOUS MATERIALS
CONTAINERS & TANKS	HAZARDOUS MATERIALS
HAZARDOUS MATERIALS	HAZARDOUS MATERIALS

Annual Terminal Rating
 Carrier's terminal is issued a satisfactory safety compliance rating.

BIT: I R NON-BIT: FEES DUE: Yes No CHP 345: CHP 1000 COL:
 INSPECTION DATE(S): 10-26,27,28,29-2010 TIME IN: TIME OUT:
 INSPECTED BY (NAME(S)): T. Mattison ID NUMBER(S): A10482 SUSPENSE DATE: Auto None

MOTOR CARRIER CERTIFICATION

I hereby certify that all violations described hereon and recorded on the attached pages (2 through 22), will be corrected in accordance with applicable provisions of the California Vehicle Code and the California Code of Regulations. I understand that I may request a review of an unsatisfactory rating by contacting the Motor Carrier Safety Unit Supervisor at (858) 650-3655 within 5 calendar days of the rating.

TERMINAL RATING: **SATISFACTORY** CARRIER REPRESENTATIVE'S SIGNATURE: Chris Olsen DATE: 10/29/2010
 CARRIER REPRESENTATIVE'S PRINTED NAME: Chris Olsen TITLE: Fleet Manager DRIVER LICENSE NUMBER: C1826340 STATE: CA

STATE OF CALIFORNIA
DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
CONTINUATION
CHP 343-1 (REV 10-97) OPI 062

Page 2 of 22

	DATE	THIS IS A CONTINUATION OF
	10/29/10	CHP 343
CARRIER NAME	CA NUMBER	
Sweetwater Union High School District	49255	
ADDRESS	FC NUMBER	
1130 5th Ave., Chula Vista, CA 91911-2812	116863	

REMARKS

13CCR 1234(f) Carrier does not keep required inspection and maintenance records. Motor carrier shall document each systematic inspection, maintenance, lubrication and repair performed for each vehicle under their control. These vehicle records shall be kept at the carrier's maintenance facility or terminal where the vehicle is regularly garaged. Such records shall be retained for a minimum of one year.

Violation Note: Carrier did not produce any records related to the repairs of defects indicated on the Daily Vehicle Inspection Reports (DVIR) for unit # 137 dated 07-23-2010.

13CCR 1215(b) (1) (A) Drivers do not always inspect vehicles prior to operation. Prior to operation drivers shall inspect each vehicle daily to ascertain that it is in safe condition. It is equipped as required by all provisions of law, and all equipment is in good working order.

13 CCR 1215(c) Drivers daily documented vehicle condition reports do not accurately indicate the condition of the vehicle(s). Unreported defects were noted which were within the scope of the driver's inspection. At the completion of the driver's work or tour of duty, each driver shall submit a daily documented report to the employer indicating the condition of the vehicle and recommending any repairs deemed necessary. A negative report shall indicate that no such conditions are present.

13 CCR 1213(k) (2) Carrier fails to obtain the required information from drivers, used intermittently. A motor carrier who uses a driver intermittently shall obtain a signed statement giving the total time on duty during the immediate preceding seven days and the time at which the driver was last relieved from duty prior to working for the motor carrier. No signed statements on file for part time driver S. Sullivan.

Carrier is directed to ensure:

1. Comply with the DMV Pull notice program.
2. Obtain a current DMV driver record or print-out, not older than 30 days before employment, for every new driver.
3. Correct all noted deficiencies in this terminal compliance report.
4. Every School bus shall be inspected ever 3,000 miles or 45 calendar days, whichever occurs first, or more often if necessary to ensure safe operation.
5. Carrier is directed to maintain the vehicles in a safe and proper operating condition.

APPENDICES
Appendix D

STATE OF CALIFORNIA
DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
**SAFETY COMPLIANCE REPORT/
TERMINAL RECORD UPDATE**
HP 343 (Rev 6-10) OPI 062

NEW TERMINAL INFORMATION <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CA NUMBER 49255	FILE CODE NUMBER 116863	COUNTY CODE 37	SEED
TERMINAL TYPE <input type="checkbox"/> Truck <input checked="" type="checkbox"/> Bus	CODE S	OTHER PROGRAM(S) T	LOCATION CODE 645	SUBAREA 01

TERMINAL NAME
Sweetwater Union High School District
TELEPHONE NUMBER (W/ AREA CODE)
(619) 691-5527

TERMINAL STREET ADDRESS (NUMBER, STREET, CITY, ZIP CODE)
1130 5th Ave., Chula Vista, CA 91911-2812

MAILING ADDRESS (NUMBER, STREET, CITY, STATE, ZIP CODE) (IF DIFFERENT FROM ABOVE)
Same As Above
INSPECTION LOCATION (NUMBER, STREET, CITY OR COUNTY)
1130 5th Ave., Chula Vista, CA 91911-2812

LICENSE, FLEET AND TERMINAL INFORMATION

DM LIC. NO.	HWT. REG. NO.	IMS LIC. NO.	TRUCKS AND TYPES	TRAILERS AND TYPES	BUSES BY TYPE I- 95 II- 2	DRIVERS 115	BIT FLEET SIZE
EXP. DATE	EXP. DATE	EXP. DATE	REG. CT	HW VEH.	HW CONT.	PPB / CSAT <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
CONSOLIDATED TERMINALS <input type="checkbox"/> Yes <input type="checkbox"/> No		FILE CODE NUMBER OF CONSOLIDATED TERMINALS AND DIVISION LOCATIONS BY NUMBER (Use Remarks for Additional FCNS)					

EMERGENCY CONTACTS (In Calling Order of Preference)

EMERGENCY CONTACT (NAME) John Lynch	DAY TELEPHONE NO. (W/ AREA CODE) (619) 691-5527	NIGHT TELEPHONE NO. (W/ AREA CODE) (619) 726-8393
EMERGENCY CONTACT (NAME)	DAY TELEPHONE NO. (W/ AREA CODE)	NIGHT TELEPHONE NO. (W/ AREA CODE)

ESTIMATED CALIFORNIA MILEAGE FOR THIS TERMINAL LAST YEAR [2010]

A UNDER 15,000	B 15,001 - 50,000	C 50,001 - 100,000	D 100,001 - 500,000	E 500,001 - 1,000,000	F 1,000,001 - 2,000,000	G 2,000,001 - 5,000,000	H 5,000,001 - 10,000,000	I MORE THAN 10,000,000
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OPERATING AUTHORITIES OR PERMITS

PUC <input type="checkbox"/> T <input type="checkbox"/> TCP <input type="checkbox"/> PSC	MOTOR CARRIER OF PROPERTY PERMIT ACTIVE <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	IMS FITNESS EVALUATION <input type="checkbox"/> Yes <input type="checkbox"/> No
USDOT US DOT NUMBER	MC MC MX	REASON FOR INSPECTION

Annual Terminal Rating

INSPECTION FINDINGS	INSPECTION RATINGS: S = Satisfactory U = Unsatisfactory C = Conditional UR = Unrated N/A = Not Applicable							
REQUIREMENTS	VIOL	MAINTENANCE PROGRAM	DRIVER RECORDS	REG. EQUIPMENT	HAZARDOUS MATERIALS	TERMINAL		
MAINTENANCE PROGRAM	3	1 S 2 S 3 S 4 S	1 S 2 S 3 S 4 U	1 S 2 S 3 S 4 S	1 N/A 2 N/A 3 N/A 4 N/A	1 S 2 S 3 S 4 U		
DRIVER RECORDS	4	No. 10 Time	No. 17 Time	No. 20 Time	TIME	TOTAL TIME		
DRIVER HOURS		HAZARDOUS MATERIALS <input checked="" type="checkbox"/> No H/M Transported <input type="checkbox"/> No H/M violations noted	CONTAINERS/TANKS No. Time	VEHICLES PLACED OUT-OF-SERVICE Vehicles Units				

Annual Terminal Rating

Carrier's terminal is issued a unsatisfactory safety compliance rating.

BIT <input type="checkbox"/> I <input type="checkbox"/> R	NON - BIT <input type="checkbox"/>	FEES DUE <input type="checkbox"/> Yes <input type="checkbox"/> No	CHP 345 <input type="checkbox"/>	CHP 100D COL. <input type="checkbox"/>	INSPECTION DATE(S) 10/19,20,27,28/11 / 11-03-11	TIME IN	TIME OUT
--	---------------------------------------	--	-------------------------------------	---	--	---------	----------

INSPECTED BY (NAME/S)
Tim Mattison
IC NUMBER(S)
A10482
SUSPENSE DATE
 Auto None

MOTOR CARRIER CERTIFICATION

I hereby certify that all violations described hereon and recorded on the attached pages (2 through 25), will be corrected in accordance with applicable provisions of the California Vehicle Code and the California Code of Regulations. I understand that I may request a review of an unsatisfactory rating by contacting the Motor Carrier Safety Unit Supervisor at (858) 650-3655 within 5 calendar days of the rating.

CURRENT TERMINAL RATING UNSATISFACTORY	CARRIER REPRESENTATIVE'S SIGNATURE <i>John Lynch</i>	DATE 11/3/2011
CARRIER REPRESENTATIVE'S PRINTED NAME John Lynch	TITLE Fleet Manager	DRIVER LICENSE NUMBER STATE N4382530 CA

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STATE OF CALIFORNIA
 DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
CONTINUATION
 CHP 343-1 (REV 10-97) OPI 062

Page 2 of 25

DATE	11/03/11	THIS IS A CONTINUATION OF
CARRIER NAME	Sweetwater Union High School District	CHP 343
ADDRESS	1130 5th Ave., Chula Vista, CA 91911-2812	CA NUMBER 49255
REMARKS		FC NUMBER 116863

Unsatisfactory Rated Terminal

As a result of these inspection findings, this terminal is rated unsatisfactory as prescribed by the following criteria: An unsatisfactory-rated terminal or hazardous materials shipper is one showing widespread noncompliance with, or willful disregard of, regulatory requirements. An unsatisfactory rating shall be assigned for the following conditions:

- (a) Failure to participate in the DMV Pull Notice Program, failure to enroll all drivers, failure to obtain periodic (up-to-date) printouts for all drivers.
- (b) Motor carrier utilizing unqualified drivers.
- (c) Failure to maintain and/or retain drivers' timekeeping records when that failure precludes a reasonable determination that the carrier is in compliance with drivers' hours-of-service requirements.

Violations as noted:

13CCR 1232(a) Carrier's preventive maintenance program is not adequate to ensure vehicles are kept in safe and proper operating condition. Vehicle condition indicates more frequent and/or thorough systematic inspection is necessary.

Violation Note: Multiple equipment violations and defects noted during Annual School Bus Terminal Inspection. Violations and defects should have been detected during the Carrier's 45 day / 3,000 mile inspections.

13CCR 1215(c) Drivers daily documented vehicle condition reports do not accurately indicate the condition of the vehicle. Unreported defects were not noted in the driver's daily inspection. At the completion of the driver's work or tour of duty, each driver shall submit a daily documented report to the employer indicating the condition of the vehicle and recommending any repairs deemed necessary. A negative report shall indicate that no such conditions are present.

13CCR 1215(c) Carrier does not require drivers to complete a daily vehicle condition report. Motor carrier shall ensure that all drivers submit a report to the employer indicating the condition of the vehicle and recommending any repairs deemed necessary at the completion of the driver's work or tour of duty. A negative report shall indicate that no such conditions are present.

Violation Note: Mechanic / Drivers fail to complete daily vehicle condition report when operating regulated commercial motor vehicles.

13 CCR 1213(a) (1) Every motor carrier shall require every driver used by the motor carrier to record his/her duty status for each 24-hour period. Each driver shall maintain a record of his/her duty status.

Violation Note: No Hour of service records on file for mechanic / drivers J. Parker and K. Shilling.

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STATE OF CALIFORNIA
 DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
CONTINUATION
 HP 343-1 (REV 10-97) OPI 062

Page 3 of 25

DATE	11/03/11	THIS IS A CONTINUATION OF
		CHP 343
CARRIER NAME	Sweetwater Union High School District	CA NUMBER
		49255
ADDRESS	1130 5th Ave., Chula Vista, CA 91911-2812	FC NUMBER
		116863

MARKS

1808.1(c) VC Carrier failed to enroll driver M. Ramirez into DMV pull notice program.
 Note: DMV Pull notice program inquiry verifies driver M. Ramirez has not been added to the DMV Pull notice program as of 11-03-2011.

1808.1(c) VC (d) Carrier did not delete drivers upon termination of employment. Upon the termination of a driver's employment, the employer shall notify the department to discontinue the drivers enrollment in the Pull Notice program.

12804.9 (c) VC A driver's license or driver certificate is not valid for operating a commercial motor vehicle, as defined in subdivision (b) of Section 15210, any other motor vehicle defined in paragraph (1) or (2) of subdivision (b), or any other vehicle requiring a driver to hold any driver certificate or any driver's license endorsement under Section 15275, unless a medical certificate approved by the department, the Federal Highway Administration, or the Federal Aviation Administration, that has been issued within two years of the date of the operation of that vehicle, is within the licensee's immediate possession, and a copy of the medical examination report from which the certificate was issued is on file with the department. Otherwise, the license is valid only for operating class C vehicles that are not commercial vehicles, as defined in subdivision (b) of Section 15210, and for operating class M1 or M2 vehicles, if so endorsed, that are not commercial Vehicles, as defined in subdivision (b) of Section 15210.

Violation Note:

Mechanic / driver K. Shilling's Medical certificate on file with DMV is expired as of 09-13-2011. Driver K. Shilling has been observed operating regulated commercial motor vehicles during the month of October, 2011.
 DMV / CLETS inquiry was conducted on 11-03-2011.

13 CCR 1213(k) (2) Carrier fails to obtain the required information from drivers, used by more than one motor carrier. A motor carrier who uses a driver intermittently or engaged in secondary employment shall obtain a signed statement giving the total time on duty during the immediate preceding seven days and the time at which the driver was last relieved from duty prior to working for the motor carrier.

Violation Note:

(1) Driver J. Bazan is presently engaged in secondary employment and is employed as a bus driver by a local motor carrier. Driver Bazan does not maintain any statements of total on duty times while working his second job.
 (2) Carrier failed to obtain signed statements from newly hired drivers M. Ramirez (hire date 08-23-2011) and driver L. Palacios (hire date 09-08-2011) giving total time on duty during the immediate preceding seven days and the time the driver were last relieved from duty.

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STATE OF CALIFORNIA
 DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
CONTINUATION
 CHP 343-1 (REV 10-97) OPI 062

Page 4 of 25

CARRIER NAME		DATE	THIS IS A CONTINUATION OF
Sweetwater Union High School District		11/03/11	CHP 343
ADDRESS		CA NUMBER	
1130 5th Ave., Chula Vista, CA 91911-2812		49255	
		FC NUMBER	
		116863	

REMARKS

CONSEQUENCES

A reinspection will be conducted within 120 days of the date of the inspection. The California Highway Patrol will attempt to contact your company within the 120 day period to schedule the reinspection. It is the motor carrier's responsibility, however, to ensure that the vehicles and all required records are made available for the reinspection, and that the reinspection is conducted within the allotted time frame. Failure to pass a reinspection may result in a recommendation to suspend your Motor Carrier of Property Permit. This may be in addition to any other enforcement action deemed necessary by the California Highway Patrol.

Carrier directed to:

1. Comply with the DMV Pull notice program.
2. Obtain a current DMV driver record or print-out, not older than 30 days before employment, for every new driver.
3. Correct all noted deficiencies in this terminal compliance report.
4. Every School bus shall be inspected ever 3,000 miles or 45 calendar days, whichever occurs first; or more often if necessary to ensure safe operation.
5. Carrier is directed to maintain the vehicles in a safe and proper operating condition.

C 343-1 (REV 10-97) ALD

STATE OF CALIFORNIA
DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
NOTICE TO CARRIER
CHP 345 (REV 10-97) OPI 062

INSPECTION DATE
11/03/11

TERMINAL NAME Sweetwater Union High School District	CARRIER NAME (IF DIFFERENT)
ADDRESS 1130 5th Ave., Chula Vista, CA 91911-2812	PRINCIPAL (OWNERSHIP)

The motor carrier terminal named above was inspected this date and has been rated UNSATISFACTORY. This is the 1st consecutive unsatisfactory rating. As indicated on the accompanying Carrier Inspection/Safety Compliance Report, the principal area of noncompliance are: (Carrier is to initial spaces beside each box checked.)

- Maintenance Program/Records
- Driver Records/Hours of Service
- Pull Notice Program
- Vehicles/Tanks/Containers
- Hazardous Materials
- Drug & Alcohol Test Program
- Other: _____

You are advised that:

- Failure to correct the noted deficiencies and to upgrade compliance to satisfactory before the next inspection (see below) may result in action number(s) 4&5 below by the department.
- As a result of the inspection findings indicated above, this Department will initiate action number(s) _____ below without further notice. You may, within 5 calendar days of this notice, request a review of the inspection findings and the action(s) to be taken. To request a prompt and impartial review by the Division Special Services Commander, contact _____ Division at _____.
- 1. A recommendation to the Department of Motor Vehicles (DMV) to suspend or revoke your motor carrier of property permit _____ Public Utilities Commission (PUC) to deny, suspend, or revoke your operating authority _____ or private carrier of passengers registration _____ Carrier is placed on notice that the DMV/PUC will deny or suspend its permit, operating authority, or private carrier of passengers registration on receipt of a written recommendation from the CHP, without further notice to the carrier. The DMV/PUC may therefore revoke the carrier's permit, operating authority, or private carrier of passengers registration.
- 2. A recommendation to the Department of Toxic Substances Control for administrative action, to include possible suspension, denial, revocation or assessment of significant monetary penalties regarding Hazardous Waste Transporter Registration, Number _____.
- 3. Suspension or revocation of your Hazardous Materials Transportation License, Number _____ Inspection and Maintenance Station License Number _____.
- 4. A complaint being filed with the District Attorney's office for prosecution. (A criminal or civil action may follow.)
- 5. Other: Any other action deemed necessary by the Dept.
- A reinspection is required in 120 days(s) tentatively scheduled in _____ days(s).
- Pursuant to Vehicle Code Section 34501.12(h), a BIT reinspection fee of (_____) must be submitted to the CHP within 60 days of the unsatisfactory rating.
- After a recommendation has been forwarded to the DMV/PUC, no reinspection will be conducted until requested by the DMV/PUC.

If you desire further information concerning this notice, you may telephone the Border Division Motor Carrier Safety Unit at: (858) 650-3655

I acknowledge receipt and understanding of the above notice.

SIGNATURE X	TITLE Fleet Manager
NAME (PRINTED) John Lynch	CALIFORNIA DRIVER LICENSE NUMBER N4382530 / CA
ISSUED BY Tim Mattison	DATE 11/3/2011
	I.D. NUMBER A10482

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Appendix E

STATE OF CALIFORNIA
DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

Page 1 of 2 pages

**SAFETY COMPLIANCE REPORT/
TERMINAL RECORD UPDATE**

CHP 343 (Rev 6-10) OPI 062

NEW TERMINAL INFORMATION <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CA NUMBER 49255	FILE CODE NUMBER 116863	COUNTY CODE 37	BED
TERMINAL TYPE <input type="checkbox"/> Truck <input checked="" type="checkbox"/> Bus	CODE S	OTHER PROGRAM(S) 1	LOCATION CODE 645	SUBAREA 01

TERMINAL NAME Sweetwater Union High School District	TELEPHONE NUMBER (W/ AREA CODE) (619) 691-5527
TERMINAL STREET ADDRESS (NUMBER, STREET, CITY, ZIP CODE) 1130 5th Ave., Chula Vista, CA 91911-2812	
MAILING ADDRESS (NUMBER, STREET, CITY, STATE, ZIP CODE) (IF DIFFERENT FROM ABOVE) Same As Above	INSPECTION LOCATION (NUMBER, STREET, CITY OR COUNTY) 1130 5th Ave., Chula Vista, CA 91911-2812

LICENSE, FLEET AND TERMINAL INFORMATION

HM LIC. NO.	HWT. REG. NO.	IMS LIC. NO.	TRUCKS AND TYPES	TRAILERS AND TYPES	BUSES BY TYPE J- 95 II- 2	DRIVERS 104	BIT FLEET SIZE
EXP. DATE	EXP. DATE	EXP. DATE	REG. CT	HW VEH.	HW CONT.	PPB / CSAT <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
CONSOLIDATED TERMINALS <input type="checkbox"/> Yes <input type="checkbox"/> No		FILE CODE NUMBER OF CONSOLIDATED TERMINALS AND DIVISION LOCATIONS BY NUMBER (Use Remarks for Additional FCNS)					

EMERGENCY CONTACTS (In Calling Order of Preference)

EMERGENCY CONTACT (NAME) John Lynch	DAY TELEPHONE NO. (W/ AREA CODE) (619) 691-5527	NIGHT TELEPHONE NO. (W/ AREA CODE) (619) 726-8393
EMERGENCY CONTACT (NAME)	DAY TELEPHONE NO. (W/ AREA CODE)	NIGHT TELEPHONE NO. (W/ AREA CODE)

ESTIMATED CALIFORNIA MILEAGE FOR THIS TERMINAL LAST YEAR [2011]

A <input type="checkbox"/> UNDER 15,000	B <input type="checkbox"/> 15,001 -- 50,000	C <input type="checkbox"/> 50,001-- 100,000	D <input type="checkbox"/> 100,001-- 500,000	E <input checked="" type="checkbox"/> 500,001-- 1,000,000	F <input type="checkbox"/> 1,000,001-- 2,000,000	G <input type="checkbox"/> 2,000,001-- 5,000,000	H <input type="checkbox"/> 5,000,001-- 10,000,000	I <input type="checkbox"/> MORE THAN 10,000,000
--	--	--	---	--	---	---	--	--

OPERATING AUTHORITIES OR PERMITS

PUC <input type="checkbox"/> T <input type="checkbox"/> TCP <input type="checkbox"/> PSC	MOTOR CARRIER OF PROPERTY PERMIT ACTIVE <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	IMS FITNESS EVALUATION <input type="checkbox"/> Yes <input type="checkbox"/> No
USDOT US DOT NUMBER	REASON FOR INSPECTION School Bus Terminal Reinspection	

INSPECTION FINDINGS		INSPECTION RATINGS: S = Satisfactory U = Unsatisfactory C = Conditional UR = Unrated N/A = Not Applicable								
REQUIREMENTS	VIOL	MAINTENANCE PROGRAM		DRIVER RECORDS		REG EQUIPMENT		HAZARDOUS MATERIALS		TERMINAL
MAINTENANCE PROGRAM		1 S 2 S 3 S 4 N/A	1 S 2 S 3 U 4 S	1 S 2 S 3 S 4 N/A	1 N/A 2 N/A 3 N/A 4 N/A	1 S 2 S 3 U 4 S				
DRIVER RECORDS		No. Time	No. 16 Time	No. Time	TIME		TOTAL TIME			
DRIVER HOURS		HAZARDOUS MATERIALS <input checked="" type="checkbox"/> No H/M Transported <input type="checkbox"/> No H/M violations noted		CONTAINERS/TANKS No. Time		VEHICLES PLACED OUT-OF-SERVICE Vehicles Units				
BRAKES		REMARKS School Bus Terminal Reinspection								
LAMPS & SIGNALS		Carrier's terminal is issued a satisfactory safety compliance rating.								
CONNECTING DEVICES										
STEERING & SUSPENSION										
TIRES & WHEELS										
EQUIPMENT REQUIREMENTS										
CONTAINERS & TANKS										
HAZARDOUS MATERIALS										

BIT <input type="checkbox"/> I <input type="checkbox"/> R	NON - BIT <input type="checkbox"/>	FEES DUE <input type="checkbox"/> Yes <input type="checkbox"/> No	CHP 345 <input type="checkbox"/>	CHP 1000 COL. <input type="checkbox"/>	INSPECTION DATE(S) 3/21/2012	TIME IN	TIME OUT
INSPECTED BY (NAME(S)) Tim Mattison					ID NUMBER(S) A10482	SUSPENSE DATE <input checked="" type="checkbox"/> Auto <input type="checkbox"/> None	

MOTOR CARRIER CERTIFICATION

I hereby certify that all violations described hereon and recorded on the attached pages (2 through 2), will be corrected in accordance with applicable provisions of the California Vehicle Code and the California Code of Regulations. I understand that I may request a review of an unsatisfactory rating by contacting the Motor Carrier Safety Unit Supervisor at (858) 650-3655 within 5 calendar days of the rating.

CURRENT TERMINAL RATING SATISFACTORY	CARRIER REPRESENTATIVE'S SIGNATURE 	DATE 3/22/2012
CARRIER REPRESENTATIVE'S PRINTED NAME John Lynch	TITLE Fleet Manager	DRIVER LICENSE NUMBER STATE N4382530 CA

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STATE OF CALIFORNIA
DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

CONTINUATION

CHP 343-1 (REV 10-97) OPI 062

Page 2 of 2

DATE	03/22/12	THIS IS A CONTINUATION OF	CHP 343
CARRIER NAME	Sweetwater Union High School District		CA NUMBER 49255
ADDRESS	1130 5th Ave., Chula Vista, CA 91911-2812		FC NUMBER 116863

REMARKS

School Bus Terminal Reinspection

Carrier's terminal was rated unsatisfactory during the Annual School Bus Terminal Inspection on November 3, 2011 for failure to participate in the DMV Pull Notice Program, failure to enroll all drivers, failure to obtain periodic (up-to-date) printouts for all drivers. Motor carrier utilizing unqualified drivers and Failure to maintain and/or retain drivers' timekeeping records when that failure precludes a reasonable determination that the carrier is in compliance with drivers' hours-of-service requirements. School Bus Terminal Reinspection conducted on March 22, 2012, Consisted of the inspection of Drivers Records only, Maintenance Programs and Regulated Equipment programs were not inspected during the reinspection process. Upon Terminal reinspect, Carrier's terminal has been issued a Satisfactory safety compliance rating.

Carrier directed to:

1. Comply with the DMV Pull notice program.
2. Obtain a current DMV driver record or print-out, not older than 30 days before employment, for every new driver.
3. Correct all noted deficiencies in this terminal compliance report.
4. Every School bus shall be inspected ever 3,000 miles or 45 calendar days, whichever occurs first; or more often if necessary to ensure safe operation.
5. Carrier is directed to maintain the vehicles in a safe and proper operating condition.

Appendix F

STATE OF CALIFORNIA
DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
**SAFETY COMPLIANCE REPORT/
TERMINAL RECORD UPDATE**
43 (Rev 6-10) OPI 062

Page 1 of 25 pages

NEW TERMINAL INFORMATION <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CA NUMBER 49255 -	FILE CODE NUMBER 116863	COUNTY CODE 37	BEO
TERMINAL TYPE <input type="checkbox"/> Truck <input checked="" type="checkbox"/> Bus	CODE S	OTHER PROGRAM(S) 1	LOCATION CODE 645	SUBAREA 01

TERMINAL NAME Sweetwater Union High School District	TELEPHONE NUMBER (W / AREA CODE) (619) 691-5527
TERMINAL STREET ADDRESS (NUMBER, STREET, CITY, ZIP CODE) 1130 5th Ave., Chula Vista, CA 91911-2812	
MAILING ADDRESS (NUMBER, STREET, CITY, STATE, ZIP CODE) (IF DIFFERENT FROM ABOVE) Same As Above	INSPECTION LOCATION (NUMBER, STREET, CITY OR COUNTY) 1130 5th Ave., Chula Vista, CA 91911-2812

LICENSE, FLEET AND TERMINAL INFORMATION

HM LIC. NO.	HWT. REG. NO.	IMS LIC. NO.	TRUCKS AND TYPES	TRAILERS AND TYPES	BUSES BY TYPE I- 95 II- 2	DRIVERS 104	BIT FLEET SIZE
EXP. DATE	EXP. DATE	EXP. DATE	REG. CT	HW VEH.	HW CONT.	PPB / CSAT <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
CONSOLIDATED TERMINALS <input type="checkbox"/> Yes <input type="checkbox"/> No		FILE CODE NUMBER OF CONSOLIDATED TERMINALS AND DIVISION LOCATIONS BY NUMBER (Use Remarks for Additional FCNS)					

EMERGENCY CONTACTS (in Calling Order of Preference)

EMERGENCY CONTACT (NAME) John Lynch	DAY TELEPHONE NO. (W / AREA CODE) (619) 691-5527	NIGHT TELEPHONE NO. (W / AREA CODE) (619) 726-8393
EMERGENCY CONTACT (NAME)	DAY TELEPHONE NO. (W / AREA CODE)	NIGHT TELEPHONE NO. (W / AREA CODE)

ESTIMATED CALIFORNIA MILEAGE FOR THIS TERMINAL LAST YEAR [2012]

A UNDER 15,000	B 15,001 - 50,000	C 50,001 - 100,000	D 100,001 - 500,000	E 500,001 - 1,000,000	F 1,000,001 - 2,000,000	G 2,000,001 - 5,000,000	H 5,000,001 - 10,000,000	I MORE THAN 10,000,000
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

OPERATING AUTHORITIES OR PERMITS

PUC <input type="checkbox"/> T <input type="checkbox"/> TCP <input type="checkbox"/> PSC	MOTOR CARRIER OF PROPERTY PERMIT ACTIVE <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	IMS FITNESS EVALUATION <input type="checkbox"/> Yes <input type="checkbox"/> No
US DOT US DOT NUMBER	REASON FOR INSPECTION	Annual Terminal Rating

INSPECTION FINDINGS

INSPECTION FINDINGS	INSPECTION RATINGS: S = Satisfactory U = Unsatisfactory C = Conditional UR = Unrated N/A = Not Applicable
REMARKS	MAINTENANCE PROGRAM
VIOL	DRIVER RECORDS
HAZARDOUS MATERIALS	REG. EQUIPMENT
TERMINAL	HAZARDOUS MATERIALS
DRIVER RECORDS	HAZARDOUS MATERIALS
DRIVER HOURS	HAZARDOUS MATERIALS
BRAKES	HAZARDOUS MATERIALS
LAMPS & SIGNALS	HAZARDOUS MATERIALS
CONNECTING DEVICES	HAZARDOUS MATERIALS
STEERING & SUSPENSION	HAZARDOUS MATERIALS
TIRES & WHEELS	HAZARDOUS MATERIALS
EQUIPMENT REQUIREMENTS	HAZARDOUS MATERIALS
CONTAINERS & TANKS	HAZARDOUS MATERIALS
HAZARDOUS MATERIALS	HAZARDOUS MATERIALS

Annual Terminal Rating

- Carrier's terminal is issued an unsatisfactory safety compliance rating.

BIT <input type="checkbox"/> I <input type="checkbox"/> R	NON - BIT <input type="checkbox"/>	FEES DUE <input type="checkbox"/> Yes <input type="checkbox"/> No	CHP 345 <input checked="" type="checkbox"/>	CHP 1000 COL	INSPECTION DATE(S) 3-26, 27, 28-13 04-04-13, 5-14-13	TIME IN	TIME OUT
INSPECTED BY (NAME(S)) Tim Mattison				ID NUMBER(S) A10482	SUSPENSE DATE <input checked="" type="checkbox"/> Auto <input type="checkbox"/> None		

MOTOR CARRIER CERTIFICATION

I hereby certify that all violations described hereon and recorded on the attached pages (2 through 25), will be corrected in accordance with applicable provisions of the California Vehicle Code and the California Code of Regulations. I understand that I may request a review of an unsatisfactory rating by contacting the Motor Carrier Safety Unit Supervisor at (858) 650-3855 within 5 calendar days of the rating.

VT TERMINAL RATING UNSATISFACTORY	CARRIER REPRESENTATIVE'S SIGNATURE <i>Thomas J. Calhoun</i>	DATE 5/14/2013
CARRIER REPRESENTATIVE'S PRINTED NAME Thomas J. Calhoun	TITLE Chief Facilities Executive	DRIVER LICENSE NUMBER STATE A 1757596 CA

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STATE OF CALIFORNIA
DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
CONTINUATION
CHP 343-1 (REV 10-97) OPI 062

Page 2 of 2

DATE	05/14/13	THIS IS A CONTINUATION OF CHP 343
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CARRIER NAME	Sweetwater Union High School District	CA NUMBER	49255
ADDRESS	1130 5th Ave., Chula Vista, CA 91911-2812	FC NUMBER	116863

REMARKS

Unsatisfactory Rated Terminal

As a result of these inspection findings, this terminal is rated unsatisfactory as prescribed by the following criteria: An unsatisfactory-rated terminal or hazardous materials shipper is one showing widespread noncompliance with, or willful disregard of, regulatory requirements. An unsatisfactory rating shall be assigned for the following conditions:

- Failure to participate in the DMV Pull Notice Program, failure to enroll all drivers, failure to obtain periodic (up-to-date) printouts for all drivers.
- Motor carrier utilizing unqualified drivers.
- Violations generally spread over all vehicles and/or maintenance violations which by their nature should have been detected and corrected under an effective inspection / maintenance program.

Violations as noted:

13CCR1230 The below listed vehicles have been placed **Out-of-Service** during this terminal inspection. These vehicles may be returned to highway service only after proper repair of the Out-of-Service conditions.

TYPE	VEHICLE LICENSE	UNIT NO	REASON
Bluebird School Bus	374713	130	Steering gear box mounting fasteners loose, gear box loose at frame rail.
International School Bus	035385	147	Axle housing U-bolts broken / loose axle # 2 right side.
Bluebird School Bus	053016	219	Axle housing U-bolts broken / loose axle # 2 left side.

13CCR 1232(a) Carrier's preventive maintenance program is not adequate to ensure vehicles are kept in safe and proper operating condition. Vehicle condition indicates more frequent and/or thorough systematic inspection is necessary. Multiple equipment violations and defects were noted during the Annual School Bus Terminal Inspection. These violations and defects should have been detected during the Carriers 45 day / 3,000 mile inspections.

STATE OF CALIFORNIA
DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
CONTINUATION
CHP 343-1 (REV 10-97) OPI 062

Page 3 of 25

	DATE 05/14/13	THIS IS A CONTINUATION OF CHP 343
CARRIER NAME Sweetwater Union High School District		CA NUMBER 49255
ADDRESS 1130 5th Ave., Chula Vista, CA 91911-2812		FC NUMBER 116863

REMARKS
Continued:

13CCR 1234(f) Carrier does not keep required inspection and maintenance records. Motor carrier shall document each systematic inspection, maintenance, lubrication and repair performed for each vehicle under their control. These vehicle records shall be kept at the carrier's maintenance facility or terminal where the vehicle is regularly garaged. Such records shall be retained for a minimum of one year.

- Carrier did not produce any records related to the repairs of defects indicated on the Daily Vehicle Inspection Reports (DVIR) for school bus unit # 205 dated 02-11-2013.
- School bus # 130 was inspected on 06-14-2012 for an annual school bus certification, two violations were noted, excessive fluid leaking from the power steering box and sharp edges exposed from a defective bumper cap both violations were noted again during the school bus terminal inspection on 03-27-13 carrier could not provide any documentation of repairs being corrected on the annual school bus certification on 06-14-2012. School bus # 130 was placed out of service on 03-27-13 during the school bus terminal inspection for loose steering gearbox mounting fasteners; contributing factor to this out of service condition was the excessive fluid leaking from the steering gearbox.

13CCR 1215(c) Driver's daily documented vehicle condition reports do not accurately indicate the condition of the vehicles. Each driver shall submit a thorough daily documented report to the employer indicating the condition of the vehicle and recommending any repairs deemed necessary. Defects were noted during the Terminal inspection that should have been reported to the carrier if a proper daily documented vehicle condition report was completed.

1808.1(c) VC Carrier does not obtain periodic Pull Notice System reports. Carrier shall obtain a periodic report from the Department of Motor Vehicles at least every twelve months.

- Carrier could not produce current pull notice reports on the following driver's
 - W. Brant
 - D. Cassard
 - M. Llamas

Note: DMV Pull notice program inquiry verified the above drivers are currently enrolled to DMV Pull notice program. DMV / CLETS inquiry was conducted on 03-26-2013.

1808.1(d) VC Carrier did not delete drivers upon termination of employment. Upon the termination of a driver's employment, the employer shall notify the department to discontinue the drivers enrollment in the Pull Notice program.

STATE OF CALIFORNIA
DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
CONTINUATION
CHP 343-1 (REV 10-97) OPI 062

Page 4 of 25

DATE	05/14/13	THIS IS A CONTINUATION OF
		CHP 343
CARRIER NAME	Sweetwater Union High School District	CA NUMBER
		49255
ADDRESS	1130 5th Ave., Chula Vista, CA 91911-2812	FG NUMBER
		116863

REMARKS

Continued:

14606(a) VC No person shall employ or hire any person to drive a motor vehicle nor shall he knowingly permit or authorize the driving of a motor vehicle, owned by him or her or under his or her control, upon the highways by any person unless the person is then licensed for the appropriate class of vehicle to be driven.

- School bus driver E. Saldana's Medical certificate on file with DMV is expired as of 07-22-2012. Driver pretrip inspections and hour of service records places driver E. Saldana operating regulated vehicles from 07-22-2012 through 04-02-2013. DMV / CLETS inquiry was conducted on 03-29-2013 / 04-02-2013 confirming that driver E. Saldana's Medical Certificate was expired. Carrier is in possession of a current DMV Pull Notice for driver E. Saldana's dated 06-08-12, pull Notice was reviewed by K. Wedemeyer.

CONSEQUENCES

A reinspection will be conducted within 120 days of the date of the inspection. The California Highway Patrol will attempt to contact your company within the 120 day period to schedule the reinspection. It is the motor carrier's responsibility, however, to ensure that the vehicles and all required records are made available for the reinspection, and that the reinspection is conducted within the allotted time frame. Failure to pass a reinspection may result in a recommendation for enforcement action by the California Highway Patrol.

Carrier directed to:

- Comply with the DMV Pull notice program.
- Obtain a current DMV driver record or print-out, not older than 30 days before employment, for every new driver.
- Correct all noted deficiencies in this terminal compliance report.
- Every School bus shall be inspected ever 3,000 miles or 45 calendar days, whichever occurs first; or more often if necessary to ensure safe operation.
- Carrier is directed to maintain the vehicles in a safe and proper operating condition.

STATE OF CALIFORNIA
 DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
NOTICE TO CARRIER
 CHP 345 (REV 10-97) OPI 062

INSPECTION DATE
 05/14/13

LOCAL NAME: Sweetwater Union High School District
 ADDRESS: 1130 5th Ave., Chula Vista, CA 91911-2812
 CARRIER NAME (IF DIFFERENT):
 PRINCIPAL (OWNERSHIP):

The motor carrier terminal named above was inspected this date and has been rated UNSATISFACTORY. This is the 1st consecutive unsatisfactory rating. As indicated on the accompanying Carrier Inspection/Safety Compliance Report, the principal area of noncompliance are: (Carrier is to initial spaces beside each box checked.)

- Maintenance Program/Records
- Pull Notice Program
- Hazardous Materials
- Driver Records/Hours of Service
- Vehicles/Tanks/Containers
- Drug & Alcohol Test Program
- Other: Unqualified Driver

You are advised that:

- Failure to correct the noted deficiencies and to upgrade compliance to satisfactory before the next inspection (see below) may result in action number(s) 4&5 below by the department.
- As a result of the inspection findings indicated above, this Department will initiate action number(s) below without further notice. You may, within 5 calendar days of this notice, request a review of the inspection findings and the action(s) to be taken. To request a prompt and impartial review by the Division Special Services Commander, contact Division at
- 1. A recommendation to the Department of Motor Vehicles (DMV) to suspend or revoke your motor carrier of property permit Public Utilities Commission (PUC) to deny, suspend, or revoke your operating authority or private carrier of passengers registration. Carrier is placed on notice that the DMV/PUC will deny or suspend its permit, operating authority, or private carrier of passengers registration on receipt of a written recommendation from the CHP, without further notice to the carrier. The DMV/PUC may therefore revoke the carrier's permit, operating authority, or private carrier of passengers registration.
- 2. A recommendation to the Department of Toxic Substances Control for administrative action, to include possible suspension, denial, revocation or assessment of significant monetary penalties regarding Hazardous Waste Transporter Registration, Number
- 3. Suspension or revocation of your Hazardous Materials Transportation License, Number Inspection and Maintenance Station License Number
- 4. A complaint being filed with the District Attorney's office for prosecution. (A criminal or civil action may follow.)
- 5. Other: Any other action deemed necessary by the Dept.
- A reinspection is required in 120 days(s) tentatively scheduled in days(s).
- Pursuant to Vehicle Code Section 34501.12(h), a BIT reinspection fee of () must be submitted to the CHP within 60 days of the unsatisfactory rating.
- After a recommendation has been forwarded to the DMV/PUC, no reinspection will be conducted until requested by the DMV/PUC.

If you desire further information concerning this notice, you may telephone the Border Division Motor Carrier Safety Unit at: (858) 650-3655

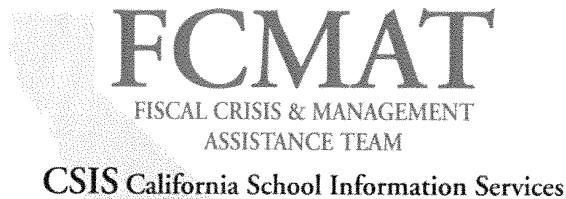
I acknowledge receipt and understanding of the above notice.

SIGNATURE: X Thomas J. Cathoun
 TITLE: Chief Facilities Executive
 CALIFORNIA DRIVER LICENSE NUMBER: A1757596
 DATE: 5/14/2013
 ISSUED BY: Tim Mattison
 I.D. NUMBER: A10482

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SCANNED



**FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
DRAFT STUDY AGREEMENT
March 20, 2013**

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

1. BASIS OF AGREEMENT

The team provides a variety of services to school districts and county offices of education upon request. The district has requested that the team assign professionals to study specific aspects of the Sweetwater Union High School District's operations. These professionals may include staff of the team, county offices of education, the California State Department of Education, school districts, or private contractors. All work shall be performed in accordance with the terms and conditions of this agreement.

In keeping with the provisions of Assembly Bill 1200, the county superintendent will be notified of this agreement between the district and FCMAT and will receive a copy of the final report. The final report will also be published on the FCMAT website.

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

The scope and objectives of this study are to:

1. Provide an analysis of staffing ratios, class and caseload size using statutory requirements for mandated services and statewide guidelines.
2. Provide an analysis of all staffing and caseloads for related service providers including psychologists, occupational and physical therapists, speech therapists, behavior specialists, nurses and others.
3. Conduct an evaluation of transportation services for special education students to ensure efficiency and identify potential cost savings. Review these services with regard to the role of the IEP, routing, scheduling, operations and staffing.
4. Review the resources allocated for nonpublic schools and agencies, mental health services and alternative programs and make recommendations for greater efficiency.

5. Review the efficiency of instructional aide staffing in special education programs. Analyze procedures for identifying the need for 1-1 instructional aides, and the process for monitoring the allocation and the need for continuing instructional aide support from year to year.
6. Compare the administrative structure and support staff for special education with districts of comparable size and make recommendations for greater efficiency.
7. Determine whether the district provides programs and services in special education above the level mandated by federal and state law.

B. Services and Products to be Provided

1. Orientation Meeting - The team will conduct an orientation session at the district to brief district management and supervisory personnel on the 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. Exit Report - The team will hold an exit meeting at the conclusion of the on-site review to inform the district of significant findings and recommendations to that point.
4. Exit Letter – Approximately 10 days after the exit meeting, the team will issue an exit letter briefly summarizing significant findings and recommendations to date and memorializing the topics discussed in the exit meeting.
5. Draft Reports - Electronic copies of a preliminary draft report will be delivered to the district's administration for review and comment.
6. Final Report - Electronic copies of the final report will be delivered to the district's administration and to the county superintendent following completion of the review. Printed copies are available from FCMAT upon request.
7. Follow-Up Support – If requested, FCMAT will return to the district at no cost six months after completion of the study to assess the district's progress in implementing the recommendations included in the report. Progress in implementing the recommendations will be documented to the district in a FCMAT management letter.

3. PROJECT PERSONNEL

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

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

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

4. PROJECT COSTS

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

- A. \$500 per day for each team member while on site, conducting fieldwork at other locations, preparing and presenting reports, or participating in meetings. The cost of independent consultants will be billed at the actual daily rate based on the provisions of Education Code section 84041.
- B. All out-of-pocket expenses, including travel, meals and lodging.
- C. The district will be invoiced at actual costs, with 50% of the estimated cost due following the completion of the on-site review and the remaining amount due upon the district's acceptance of the final report.

Based on the elements noted in section 2 A, the total estimated cost of the study will be \$32,000.

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

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

5. RESPONSIBILITIES OF THE DISTRICT

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

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

6. PROJECT SCHEDULE

The following schedule outlines the planned completion dates for different phases of the study:

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

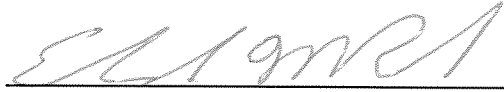
8. CONTACT PERSON

Name of contact person: Maria Castilleja, Executive Director, Curriculum and Instruction

Telephone: (619) 691-5596

Fax: (619) 407-4975

E-mail: maria.castilleja@sweetwaterschools.org



Edward M. Brand, Ed.D., Superintendent
Sweetwater Union High School District



Date



Anthony L. Bridges, CFE
Deputy Executive Officer
Fiscal Crisis and Management Assistance Team

March 20, 2013

Date