

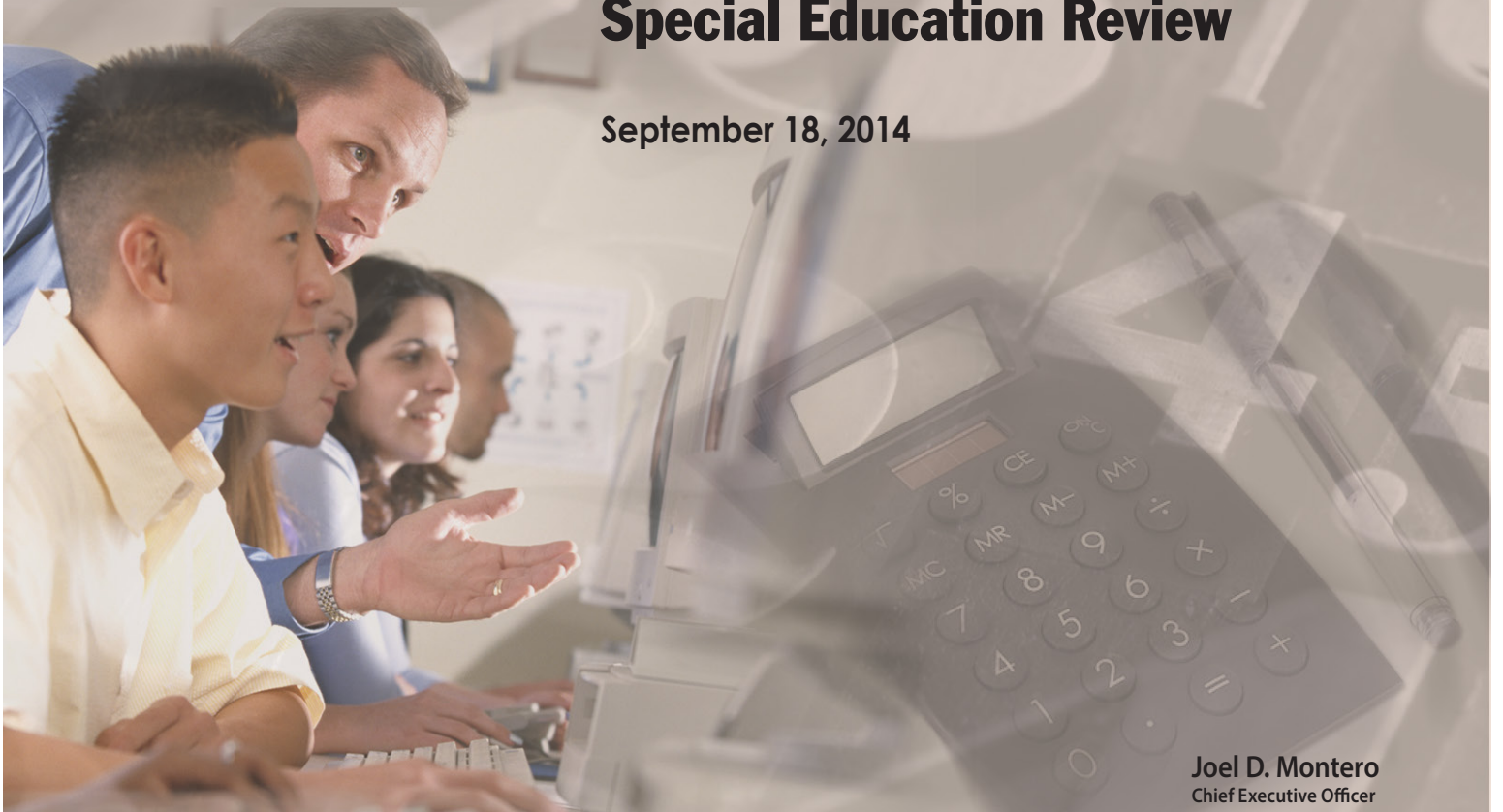


CSIS California School Information Services

# Fremont Union High School District

## Special Education Review

September 18, 2014



Joel D. Montero  
Chief Executive Officer







September 18, 2014

Polly Bove, Superintendent  
Fremont Union High School District  
589 W. Fremont Avenue  
Sunnyvale, CA 94087

Dear Superintendent Bove,

In December 2013, the Fremont 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 special education 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.
4. Review the special education transportation delivery system, including but not limited to the role of the individualized education program (IEP), routing, scheduling, operations and staffing.
5. Review the use of resources allocated for nonpublic schools and agencies, mental health services and alternative programs and make recommendations for greater efficiency.
6. Review the efficiency of instructional aide staffing in special education programs. Analyze the procedures for identifying the need for 1-to-1 instructional aides, the process for monitoring and allocating instructional aide resources, and the need for continuing support from year to year.
7. Compare the special education administrative structure and support staff with districts of similar size and make recommendations for greater efficiency.

**FCMAT**

Joel D. Montero, Chief Executive Officer

1300 17<sup>th</sup> Street - CITY CENTRE, Bakersfield, CA 93301-4533 • Telephone 661-636-4611 • Fax 661-636-4647  
755 Baywood Drive, 2<sup>nd</sup> Floor, Petaluma, CA 94954 • Telephone: 707-775-2850 • Fax: 707-636-4647 • [www.fcmat.org](http://www.fcmat.org)  
Administrative Agent: Christine L. Frazier - Office of Kern County Superintendent of Schools

This final report contains the study team's findings and recommendations in the above areas of review. FCMAT appreciates the opportunity to serve the Fremont 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 fluid and cursive, with a large initial "J" and "M".

Joel D. Montero  
Chief Executive Officer

# Table of Contents

Foreword .....	iii
Introduction .....	I
<i>Background</i> .....	I
<i>Study Guidelines</i> .....	I
<i>Study Team</i> .....	I
Executive Summary .....	3
Findings and Recommendations	
<i>Staffing, Caseloads and Efficiency</i> .....	5
<i>Special Education Transportation</i> .....	11
<i>Nonpublic Schools and Agencies</i> .....	17
<i>Paraeducator Staffing</i> .....	21
<i>Administrative Structure</i> .....	23
Appendices .....	25



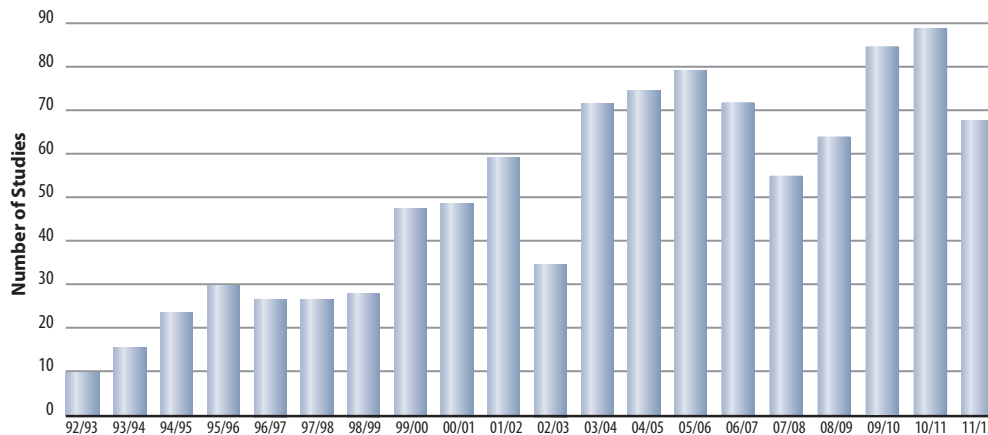
# About FCMAT

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 more than 1,000 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

Fremont Union High School District is located in Santa Clara County and serves 10,710 students in general education, including 982 students with disabilities. The special education identification rate is 9%, which is below the statewide average of 10%.

## Study Guidelines

FCMAT visited the district from May 20-23, 2014 to conduct interviews, collect data and review documents. This report is the result of those activities and is divided into the following sections:

- Staffing, Caseloads and Efficiency
- Special Education Transportation
- Nonpublic Schools and Agencies
- Paraeducator Staffing
- Administrative Structure

In writing its reports, FCMAT uses the Associated Press Stylebook, a comprehensive guide to usage and accepted style that emphasizes conciseness and clarity. In addition, this guide emphasizes plain language, discourages the use of jargon and capitalizes relatively few terms.

## Study Team

The study team was composed of the following members:

William P. Gillaspie, Ed.D.  
FCMAT Deputy Administrative Officer  
Bakersfield, California

JoAnn Murphy  
FCMAT Consultant  
Santee, California

Timothy W. Purvis\*  
Director, Transportation  
Poway Unified School District  
Poway, California

Larry C. Laxson  
FCMAT Consultant  
El Cajon, California

Anne Stone  
FCMAT Consultant  
Mission Viejo, California

Jackie Kirk-Martinez, Ed.D.  
FCMAT Consultant  
Pismo Beach, California

Laura Haywood  
FCMAT Technical Writer  
Bakersfield, California

\*As a member of this study team, this consultant was not representing his employer but was working solely as an independent contractor for FCMAT. Each team member reviewed the draft report to confirm its accuracy and to achieve consensus on the final recommendations.

# Executive Summary

Using industry standards developed by School Services of California, Inc. and the staffing requirements of Education Code Section 56362(c), the district is overstaffed in certificated special education positions such as resource specialist, adaptive physical education, school psychologist and speech pathologist, at an excess cost of \$1,664,000. The district is understaffed in school nurse positions by 2.8 FTE.

The district is overstaffed by 5.25 FTE in instructional assistants for the resource specialist support outlined in EC 56362(6)(f) at an excess cost of \$304,500. It is overstaffed by 8.5 FTE instructional aides in SDC classes at an excess cost of \$493,000 including statutory health and welfare benefits.

The district reviews the need for each position and uses the SELPA special circumstances instructional aide process when appropriate. The district provides a higher level of classroom support with instructional aides when more classroom support is needed.

The district utilizes a joint powers authority (JPA) for transportation that is loosely managed, resulting in high excess cost for all members. The JPA does not routinely seek competitive bids on contracts. The number of students served does not match recent invoices and billing, and routing is controlled by the JPA rather than the districts.

During the 2013-14 school year the district's payment percentage for special education transportation increased from 19.2% to 30%. The transportation cost per student for both the JPA and the district appears to be higher than the average cost per pupil being transported statewide. The JPA should be monitored and supervised by each participating district and formal meetings held at least two to three times annually, with approval of an annual budget. The director of transportation for the administering agent should actively administer the JPA.

The number of district students enrolled in a nonpublic school (NPS) has decreased over the last four years. The projected cost for the students has also decreased, but not commensurate with the decrease in the number.

Residential room/board and mental health costs are included in the NPS budget, not in the Educationally Related Mental Health Services (ERMHS) budget. Not all staff assigned to mental health activities are coded under ERMHS. The district combines NPS and nonpublic agency (NPA) costs in the budget, which can make it difficult to monitor the resources.

The mental health services provided to district students, including some general education students, are extensive and expensive. The revenue received under ERMHS does not cover all costs, and NPS room and board costs are not charged to this budget.

The district does no medical billing. Other districts in the SELPA bill Medi-Cal for mental health services.



# Findings and Recommendations

## Staffing, Caseloads and Efficiency

FCMAT was asked to analyze all special education certificated and classified staff positions using requirements for mandated services and statewide guidelines.

The district provided FCMAT with various staffing reports that were generated manually and through computer programs that were not reconciled. Review of these reports revealed discrepancies related to staffing levels for special education services districtwide. FCMAT utilized the staffing report containing staff lists aligned to budget codes and interviewed the director of special education. Manually maintained data is often inaccurate, outdated, and more susceptible to human error. It is also more labor-intensive. Human Resources and Business Services should strengthen communications with Special Services to improve the accuracy of the existing position control system.

It is best practice for special education administrators and business department to establish objective staffing criteria and to monitor the following data monthly:

- Caseloads and class sizes of all service providers and teachers using a carefully maintained database. This should include lists by school, service delivery option and teacher, to be shared with special education staff and school site principals.
- The number of instructional assistants, especially when new staff is added.
- All related services caseloads including psychologists (counseling), speech language pathologists, adaptive physical education, etc.

## Resource Specialist Program (RSP)

The resource specialist position provides specialized academic instruction to disabled students in general education and as a pullout program. The district has a 1.0 FTE lead resource specialist (LRS) at each of its five high schools. In addition to carrying a caseload, the LRS coordinates special education for the school site. These duties are in addition to department chair responsibilities. Additional duties include but are not limited to class scheduling, testing coordination, assessment planning, new teacher support, curriculum development, administrator designee for IEP meetings, and transition coordination. The LRS teachers instruct two periods out of a seven period day, except for Fremont High School where the LRS instructs one period per day. The LRS teachers may receive up to 10 additional days of extra duty pay through submission of a timesheet. The LRS receives clerical support at the site that is charged to special education. Clerical support districtwide for special education is approximately 3.0 FTE. Eliminating these positions would require other administrative and clerical employees to absorb the site responsibilities.

The caseload average for district resource specialists was calculated using a divisor of 28, which is the Education Code (EC 56362(c)) maximum number of special education students these teachers can serve. District data in the following table indicates that the district has 29 RSP teachers (excluding .5 FTE certificated teacher from Homestead), with an average caseload of 17.24 students. This is 10.76 students less per caseload than the maximum allowed by Education Code. If the district staffed RSP positions per the statutory requirement of 1-to-28, it could decrease staffing by 11 FTE. FCMAT also analyzed the allocation of instructional assistants to

RSP and found a similar pattern of overstaffing. Education Code 56362(6)(f) states that, “At least 80% of the resource specialists within a local plan shall be provided with an instructional aide.” A total of 19.65 instructional assistants are assigned to this program. If the district followed the Education Code staffing guidelines, it would need 14.4 instructional assistants districtwide. Therefore, 5.25 eight-hour corresponding assistant positions could be eliminated. This would yield a savings of \$1.1 million for certificated staff and \$304,500 for classified staff, including salary, statutory benefits and health/welfare benefits.

### *Resource Specialist Caseload Comparison*

Program	No. of Teachers	No. of Students	Ed Code Maximum Caseload (EC 56362)	Average Caseload	Aides	I-to-I Aides
Lynbrook	3	49	28	16.3	2.625	
Homestead	6	109	28	18.1	3.9	
Fremont	11	204	28	18.5	5.875	
Cupertino	5	82	28	16.4	4	.75
Monta Vista	4	56	28	14	3.25	

Does not include Homestead .5 certificated FTE without a caseload

Source: California Education Code 56362 and district data

## Mild to Moderate Special Day Class Caseloads

The district operates 16.9 support service classes for students requiring a special day class setting. The average class size is 13.25, which is within the statewide guidelines from School Services of California, Inc. (SSC). The Education Code does not include maximum caseloads for mild to moderate SDCs; however, SSC has developed caseload guidelines. The following table shows the mild to moderate class sizes and compares them to the SSC guidelines.

FCMAT also analyzed the allocation of instructional assistants in the mild to moderate classrooms. The results show slight overstaffing compared to the SSC guidelines. These guidelines recommend one instructional assistant to 12-15 students. The allocation of instructional aide support in classes exceeds the SSC guidelines by 1.35 instructional assistants, which could be reduced for a cost savings of \$78,300 (286 students divided by 16.9 classes = 16.9; 18.25 aides [excluding 1-to-1] minus 16.9 = 1.35).

### *Mild/Moderate SDC Caseloads*

Program	No. of Teachers	No. of Students	SSC Guideline for Students per Class	Average No. of Students in Class	Aides	I-to-I Aides
Lynbrook	1.9	29	12-15	15.2	2.6853	
Homestead	4	55	12-15	13.75	3.5	.875
Fremont	2	32	12-15	16	2	
Cupertino	6	62	12-15	10.3	6	
Monta Vista	3	46	12-15	15.3	4.0625	

Source: School Services of California and district data

## Moderate to Severe Special Day Class Caseloads

The district operates 15.5 moderate to severe classrooms (SDC) excluding Horizon alternative transitional programs. The average class size for the moderate to severe SDC program is one teacher to 9.748 students, which is within the SSC guidelines.

FCMAT analyzed the instructional assistant staffing in moderate to severe classrooms, excluding Horizon, and found it exceeded SSC guidelines. These guidelines suggest two instructional assistants to each moderate to severe class. The district has 39.5375 instructional assistants assigned to the 15.5 moderate to severe programs, an overall staffing ratio of 2.55 instructional assistants for every program. A reduction of 8.5 instructional assistant positions would yield a savings of \$493,000.

### *Moderate/Severe SDC Caseloads*

Program	No. of Teachers	No. of Students	SSC Guideline for Students per Class	Average No. of Students in Class	Aides	I-to-I Aides
Lynbrook	3	32	8-10	10.6	6.875	
Fremont	2	15	8-10	7.5	5.515	.88
Cupertino	2	20	8-10	10	5	
Voyager	2.5	31	8-10	12.4	4.9375	
Monta Vista	1	10	8-10	10	2.2	
Bridges	2	19	8-10	9.5	6.125	
De Anza/Lyncs	1	9	8-10	9	3	
Homestead-Wings	2	15	8-10	7.5	5.875	

Calculations exclude Horizon

Source: School Services of California and district data

## Related Services (formerly Designated Instructional Services)

Related services include those involving speech therapy, psychologists, and adapted physical education.

### Speech and Language Pathologist Caseloads

The district employs 4.2 FTE speech pathologists with an average caseload for direct speech therapy of 38. Many of the speech pathologists provide additional consultation services to students with or without direct services, with an average caseload of 58. Education Code 56363.3 establishes a maximum caseload of 55 for students ages 5 to 22. Education Code does not include nor exclude consultation service delivery models. Using the Education Code statutory requirement, the district should consider reducing the speech pathologist FTE by 1.3 for a cost savings of \$130,000.

### *Speech and Language Pathologist Caseloads*

Provider	District Total FTE-to-Caseload Ratio	District Average Caseload Ratio	Ed Code Maximum FTE-to-Caseload Ratio
Speech-Language Pathologist-Overall Ratio w/o consults	4.2-to-161	38	1-to-55
Speech-Language including consults	4.2-to-246	58	1-to-55
SLP with consults may include duplicated students for direct and consultation services.			

Source: California Education Code 56363.3 and district data

### **Adapted Physical Education (APE)**

The district employs one adapted physical education teacher with a caseload of seven students. This caseload falls significantly below the industry standard practice outlined by SSC (1-to-45-55). A reduction of .75 of this position would save \$75,000.

### *Adapted Physical Education Caseload Comparison*

Program	No. of FTE	Caseload	SSC Guideline for Students per Class	Average No. of Students	Aides	I:I Aides
APE	1	7	1-to-45-55	1-to-7		

Source: School Services of California and district data

### **Psychologist**

The district has 9.2 FTE psychologists charged to special education and serving all district students, for a ratio of 1-to-1163. The following table shows the district school psychologist staffing ratio compared to the statewide average established by the California Association of School Psychologists (CASP). This is a compilation of statewide staffing data. It shows the district is overstaffed by 2 FTE psychologists. Reducing the psychologist positions by two would save at least \$200,000.

Program	No. of FTE	Caseload	CASP Data for Students per Class	District Caseload Average	Aides	I-to-I Aides
Psychologist	9.2	10,700	1-to-1469	1-to-1163	0	0

Source: CASP and district data

### **Nurses**

The district has 1 FTE districtwide nurse for approximately 10,700 students. This position is funded 100% through special education. District staff interviews and data indicate the district nurse provides support to students with IEPs, 504s and to the general population for mandated



health screenings and medical needs. The district provides a stipend to two staff at each of the five school sites. One position is considered a first responder and is paid a \$900 stipend, and the other position enters health and medical data and is paid a \$1,800 stipend. Although there is no mandated requirement, CASP reports the state's average nurse-to-student ratio as 1-to-2815. This places the district approximately 2.8 positions below the average.

### *School Nurse Caseload Comparison*

Provider	FTE	Caseload	School Nurse FTE-Student Ratio	Clerical responder	Clerical data entry	CASP Ratio (FTE-to- Student Caseload)
School Nurse	1	10,700	1-to-10,700	5	5	1-to-2815

Source: CASP and district data

## Print Technicians

Through interviews and documents provided by the district, FCMAT found that two 0.5 FTE printing technicians located at Lynbrook and Monta Vista high schools, respectively, are allocated to the special education budget. These positions are not specific to special education programs. However, it was indicated that these positions do support students through vocational training.

## Recommendations

*The district should:*

1. Conduct regular meetings between the business department and Special Services department regarding position control and budget coding and resources.
2. Develop and implement caseload criteria for RSP teachers and instructional assistants based on Education Code.
3. Develop and implement consistent criteria for a standard workday for instructional assistants supporting RSP.
4. Develop an automated system to monitor and track special education staffing and caseloads for both certificated and classified staff.
5. Align the automated staffing and caseload system with information maintained in multiple databases across departments (Special Services, Human Resources, Business Services).
6. Consider reducing the number of RSP positions for a total savings of \$1.1 million.
7. Consider eliminating 3.0 FTE clerical support for special education paperwork provided for the five LRS positions.
8. Consider following the statutory requirements for instructional aide support in resource specialist programs to reduce 5.25 FTE.

9. Consider reducing 1.35 instructional aide positions in the mild to moderate programs.
10. Consider reducing 8.5 instructional aide positions in the moderate to severe programs.
11. Consider reallocating nursing resource account coding to align with responsibilities while evaluating health and safety needs districtwide.
12. Consider reducing the adapted physical education position. Because APE is a unique position, consider contracting this service to other districts and retain the current FTE, thus providing revenue.
13. Consider reducing school psychologist positions by 2 FTE to align with the CASP statewide average.
14. Consider reducing speech therapy positions by 1.3.
15. Consider funding the two 0.5 FTE print technicians through general education.

# Special Education Transportation

## Overview

The district has five comprehensive high schools, grades 9-12. It does not operate an in-house pupil transportation program but does offer minimal home-to-school and general education transportation service through issued public transit bus passes.

The district is located in the heart of the Silicon Valley in Santa Clara County and serves high school students living in the city of Cupertino, most of the city of Sunnyvale and portions of the cities of San Jose, Los Altos, Saratoga and Santa Clara.

California Special Education Management Information System (CASEMIS) data shows approximately 940 district students with individualized education programs (IEPs). Approximately 128 of these students have transportation listed on the IEP as a necessary related service. This is approximately 13.6%, which is a slightly higher percentage compared to school districts throughout the state that FCMAT has studied. Transportation for the district's special education population is provided through a joint powers authority (JPA), the Silicon Valley Joint Powers Transportation Agency. The six-member JPA was created May 1, 2001; the same six originating districts remain partners in the JPA today. The member districts are Santa Clara Unified School District, the Fremont and Mountain View/Los Altos union high school districts, and the Los Altos, Mountain View Whisman, and Sunnyvale elementary school districts. Santa Clara USD comprises approximately 50% and Fremont UHSD comprises approximately 30% of the JPA students, with the other four districts comprising approximately 20% collectively. The JPA is administered by the Santa Clara USD, with fiscal oversight provided by the Fremont UHSD. Outside contractors provide all transportation services for the JPA.

## School Transportation Finance

School transportation is arguably one of the most poorly funded areas of the education budget in California. Prior to 1977, school transportation was fully funded. School districts would report their operational costs and were fully reimbursed in the subsequent school year. With the passage of Proposition 13, the state began reducing the percentage of reimbursement. By the 1982-83 school year, districts were reimbursed at 80% of their reported costs. The state capped the reimbursement at the level of costs the school districts reported in that year, only occasionally granting a cost of living adjustment. Over the past 31 years, costs have risen significantly, demographics have changed and the need for special education transportation has increased dramatically. Since 2008, the amount each school district receives has been reduced by approximately 20%.

In the 2013-14 school year California adopted a new school funding formula, the Local Control Funding Formula (LCFF). School transportation is funded at the same level as the prior year appropriation. The funding is an add-on to the base grant received by each district. It can only be spent on school transportation, and districts need to spend at least as much as they receive to maintain the same level of funding. Statewide, California provides approximately 38% of the funding necessary for school transportation, based on school districts' reported approved costs.

The Fremont UHSD has budgeted approximately \$2,262,161 for special education transportation for the 2013-14 school year, of which approximately \$1.9 million is the district's shared expense for its students transported in the JPA. Based on student data collected from JPA contractor invoices for April 2014, the JPA transports approximately 128 district students.

Therefore, the district's per-student cost will be approximately \$14,843. This far exceeds the average found in FCMAT's most recent analyses of per student special education cost of approximately \$9,000 to \$11,000. The contractor invoices for April 2014 show that the JPA transports approximately 578 students for all six partner districts. Using the projected 2013-14 JPA budget of \$7,890,000 collected from source data provided by both the JPA and the district, the JPA per-student cost is approximately \$13,650, also substantially higher than costs recently reviewed by FCMAT throughout the state. Total JPA students transported was collected from sample JPA route sheets and sample billing invoices, although the documentation suggests a greater number of students may be transported. This cannot be validated without a more thorough examination of the JPA's routing practices.

The JPA uses three private contract operators to transport students. Collectively, the three operators utilize approximately 140 vehicles (school buses, non-school bus passenger vans and cabs) to provide service. Based on the April 2014 student billings from all contractors, the JPA has an average ridership per vehicle of four students. This is a very low ridership average, much of which can be attributed to the aggressive usage of independent cabs. However, extrapolating the use of approximately 30 cabs from the calculation, the average student ridership is only approximately four to five students per vehicle. As a result, the annual transportation expense per student is very high. Recent FCMAT studies reflect an average ridership of approximately 10 students per vehicle.

Two of the JPA contractors transport students on school buses. However, the greatest number of both district and other JPA district students are transported in passenger vehicles. The JPA districts also utilize a high number of cabs for individual or paired student transportation, which they request for individual students, with the JPA coordinating cab usage. Invoice billing for cab transportation is a pass-through expense to the individual districts. The Fremont UHSD has the highest number of students (12) being transported by cab of all the JPA districts. A total of 30 students in the JPA are transported by cab. The six districts' reasoning for requesting cabs may merit a collective discussion as to why this is viewed as the best, safest and least restrictive manner to transport this many students. Although in some instances 1-to-1 transportation may be in a student's best interest, group transportation to proximate locations should be used where feasible.

Routing shows that for the district's 140 students transported by the JPA, 43 are transported by the school bus contractor, 85 are transported by another contractor using both school buses and nonconforming passenger vehicles, and 12 are transported by cabs. Using both the April billing invoices and JPA transportation route documents as source documentation, there is a discrepancy of approximately 12-15 students being transported for Fremont. The JPA route documentation may not reflect the actual number of students transported for the district because special education transportation requests change regularly. FCMAT's analysis of per student expense was based on the billing invoice document, which shows 128 students. However, the discrepancy between the JPA route information and contractors' bills is cause for concern.

The district budgeted \$25,000 in 2013-14 for eight parent in-lieu transportation contracts. The district pays parents the current IRS rate of .56 per mile, which is common industry practice. The number of parent in-lieu contracts is slightly greater than would be expected, but may represent the number of students attending individual programs well outside the district and JPA boundaries, along with individual students' special needs and requests by parents to provide transportation. Currently, because of the high per-student JPA transportation cost, the parent in-lieu arrangements are beneficial and cost effective for the district. However, with a more competitive per-student cost structure, the district would want to ensure that it does not approve

parent in-lieu transportation contracts to program locations that the JPA serves, which presumably would be less costly.

As of the 2013-14 school year, the district has begun providing fiscal oversight for the JPA at an annual charge of \$10,000, which is reasonable and equates to approximately \$17.30 per student. Additionally, the district has budgeted \$475,000 for annual school bus passes on the local municipal bus service for their special education students involved in community life skills or transition programs.

## Recommendations

*The district should:*

1. Examine the costs of JPA special education transportation to ascertain why it is substantially greater than other comparable transportation programs.
2. Examine the JPA's routing practices to determine reasons for the low ridership per vehicle.
3. Review the practice and reasoning for requesting student transportation by cab.
4. Determine why a discrepancy exists between the route information and the per-student billing by the JPA.

## JPA Transportation Contracts

The JPA has contracts with three transportation providers. Formal contracts are in place with Student Transportation of America (STA) and Safe Trans; however, neither contract has been recently competitively bid to ensure that the districts receive the best and most competitive pricing structure and service. Review of JPA source documents provided to the study team indicates that the last most recent contract competitive bid for STA was in July 2002. Likewise, the most recent contract competitive bid for Safe Trans was in March 2004. There have been several contract extensions with both providers, although in some cases the extensions are not for consecutive years or some years may not be documented. The contracts follow standard industry practice, and annual costs appear reasonable.

A third transportation provider, Yellow Checker Cab, has no contract with the JPA. The district should require the JPA to have formal transportation contracts with any provider that transports its students. Generally, it is common practice to bid a transportation contract for one to three years, allowing for one to three possible contract extensions and agreed upon cost increases based on a local price index.

Contracts for school bus transportation and non-school bus passenger vehicle or cab transportation should be specific for the type of student transportation provided. Contracts should specify all regulatory requirements for each type of transportation, and require appropriate operator background checks, fingerprinting, and pre-employment and random substance testing. The school bus transportation contracts appear to contain the necessary elements, but the non-school bus passenger vehicle transportation contracts do not.

Although the contracts contain a stipulation for liquidated damages, neither contract is explicit with regard to late bus arrival or delivery. Language only addresses failure to provide transportation for a prescribed student. Sample contractor invoices do not appear to apply discounts for late pick-up or delivery of students.

The JPA schedules member districts' special education students on a Bus Service Request (BSR) form. In addition, the JPA has created a decision tree for suggested use by each member district to determine the transportation needed in the least restrictive manner. However, it appears that few member districts utilize the form. The transportation request form used by the districts is fairly extensive. It may be possible to combine this form with the BSR.

## Recommendations

*The district should:*

1. Work with the JPA to ensure current contracts exist for all transportation providers.
2. Request the JPA to determine and follow best practices for competitively bidding transportation contracts and extension periods.
3. Ensure that JPA contracts are specific for the type of transportation service requested, follow industry best practices for student safety, and include conditions of use for non-school bus passenger vehicles and cabs.
4. Work with the JPA to ensure that all transportation contracts contain liquidated damages clauses for failure to perform that include student pick-up and delivery within reasonable time parameters.
5. Direct the JPA to apply liquidated damages based on the discounts contained in the transportation contracts, passing these discounts on to the participant districts.
6. Require the JPA to rigidly monitor all contractors for timely pick-up and arrival times as stipulated by contract, and aggressively apply liquidated damages when applicable.
7. Review the collective use of the BSR form and decision tree to ensure that districts provide transportation only to special education students who need it to access their educational programs, and do so in the least restrictive manner.

## District JPA Model

The purpose of this analysis is to review the special education student transportation delivery system for the Fremont UHSD. Because this transportation is provided through a JPA, a general review of the JPA's practices was done. Findings and recommendations made in this section are specific as to their effect on the Fremont UHSD.

The district and five other districts are each original members of the Silicon Valley Joint Powers Transportation Agency, created May 1, 2001. The by-laws state that each member district has one

representative and one alternate representative on the JPA board. Each member is allowed one vote. The board elects these officers: president, vice president and secretary.

District staff stated that the JPA board meets monthly. Generally, member districts select their respective special education directors to serve on the JPA board. Currently, the district's special education director serves as president of the JPA. Historically, member districts' chief business officials (CBOs) do not serve on the JPA board. Each member district has one vote regardless of what percentage of the JPA its students represent. Billing is based on each district's percentage of the total students transported annually. Currently, Fremont UHSD comprises approximately 30% of the total students transported by the JPA and is billed 30% of the actual costs. Bills for students transported by cab are sent directly to the respective districts as a pass-through expense of the JPA.

The JPA formation document states that the agency will create an operating budget that is adopted by each member district. Projected expenses for each member district will be billed and paid in quarterly installments.

The JPA board can select an oversight fiscal agent, which currently is the Fremont UHSD. Historically, both the JPA administrative agent district and the fiscal oversight district has been the Santa Clara USD. The Santa Clara USD continues to provide administrative oversight and houses the transportation facility.

The JPA has one full-time employee, a transportation coordinator. The transportation manager for the Santa Clara USD provides some administrative oversight. Santa Clara USD staff also provide clerical and accounting assistance.

The JPA transportation coordinator handles scheduling and route development. The contractors are given bus routes listing the students needing service. The number of vehicles contracted through three transportation providers for the number of JPA students served appears significantly high, with an average of approximately four students per vehicle. As a result, the JPA member districts, particularly the Fremont UHSD, pay higher than expected costs per student. The statewide average is 10 students per vehicle. Lower averages are expected in rural environments with long ride times, and higher averages are expected in more urban or suburban community settings. The JPA operates in a largely urban/suburban setting.

Although an in-depth JPA program analysis was not performed for this study, the JPA appears significantly understaffed with only one full-time employee coordinating routing and routine duties for the approximately 578 students served. Transportation programs of this size often have administrative oversight of a supervisor along with one to two routing schedulers and clerical support. The administrative agent district provides some of this support, although the daily operation and routing appears to be performed solely by the JPA transportation coordinator.

The JPA could benefit from greater financial oversight by member districts' CBOs, much as the member districts' special education managers provide strong direction regarding program needs. The JPA's operating budget appears ample and the districts' per-student costs are high. Each member district could involve its CBO in oversight of the JPA, or one district's CBO could be selected to be a regular JPA board member. Each district CBO need not attend each regularly scheduled JPA board meeting, but a meeting could be held once or twice annually to include each member district's CBO.

The cooperative six-member JPA is a good transportation model. Having JPA staff schedule and generate the routing for the JPA's transportation contractors should afford the greatest efficiency and competitive cost over what any of the six individual districts could achieve on their own. The



attached map identifies the Fremont UHSD's students transported by the JPA: 85 are transported by Safe Trans, 43 are transported by Student Transportation of America, 12 are transported individually by Yellow Checker Cab Company and another two students are transported by both Safe Trans and Student Transportation of America for a total of 142. The map illustrates the collective benefits gained by merging the six member JPA districts' special education students, allowing for greater efficiency by total number within their geographic boundary. Because special education student transportation delivery models are inherently inefficient when viewed by total students transported per vehicle because of individual student pick-up and delivery points, cooperation with neighboring districts covering the same special education program boundaries can and should yield greater efficiency and reduce expense per student for each district. The cooperative effort under a formal transportation agency managed by district/JPA staff should ensure that the member districts' students are provided the safest and most efficient special education transportation for the least and most reasonable cost.

## Recommendations

*The district should:*

1. Engage in discussion with other member JPA districts to examine the routing methodology and contractor vehicles selected to perform services to ensure system efficiency.
2. Discuss with the JPA board an alternative staffing configuration that may increase routing and scheduling efficiencies and oversight.
3. Encourage each member district to involve its CBO in oversight of the JPA, or consider selecting one district's CBO to be a regular attending JPA board member.
4. Assume a greater influence over the JPA delivery model, budgeting, expenses and routing method along with the other five member districts.



## Nonpublic Schools and Agencies

FCMAT was asked to review the use of resources allocated for nonpublic schools (NPS), nonpublic agencies (NPA), and mental health services, and make recommendations for greater efficiency.

An NPS is defined in the California Education Code as a “private, nonsectarian school that enrolls individuals with exceptional needs pursuant to an individualized education program and is certified by the department. It does not include an organization or agency that operates as a public agency or offers public service, including, but not limited to, a state or local agency, an affiliate of a state or local agency, including a private, nonprofit corporation established or operated by a state or local agency, or a public university or college. A nonpublic, nonsectarian school also shall meet standards as prescribed by the Superintendent and board.” (Education Code 56034).

For district students who receive Educationally Related Mental Health Services (ERMHS), discussed later in this section, the district follows a defined process prior to initiating referral to an NPS. For students who do not receive ERMHS, district staff report that an unwritten process and procedure is followed that includes increased levels of behavior interventions in collaboration with the school psychologist and behavior specialists prior to considering an NPS referral. For both groups of students, additional classroom support and placement in other district programs are considered, and provided as appropriate, prior to the NPS referral.

The district contacts the Santa Clara Special Education Local Plan Area II (SELPA) program specialist for consultation, observation and assistance, if appropriate, in locating potential NPSs. In addition, the SELPA program specialist attends the NPS IEPs and provides the district with other assistance during the placement.

When a student is first placed in an NPS, their initial IEP plan does not include specific language for transitioning the student back into a district program. District staff reported that the NPS IEPs do not include transition language until the IEP team has determined that the student is ready to return to the district. Including this language in every NPS IEP focuses the team on returning the student to a district program as soon as possible.

Several variables affect the cost of an NPS. These include the number of days the NPS operates its base school year and extended year program, if it includes related services in its base fee or charges separately for them, and if it provides transportation. If the same number of students is in NPS placements in different years, the total cost will vary.

The special education department provided FCMAT with the NPS placements for 2009 to April 30, 2014. The data for 2009-10 and 2013-14 included student names, but the 2010-11, 2011-12 and 2012-13 data did not. Student names made it possible to determine if there was more than one billing line for a student, or if a student attended more than one NPS in the school year. Therefore, only 2009-10 and 2013-14 were used to compare the number of NPS students. There was a decrease of 14 district students placed in an NPS from 2009-10 to 2013-14, and the total cost for those students decreased by \$621,673.

*Four-year comparison of NPS schools, students and education costs*

Year	No. of NPS	No. of Students	Total cost
2009-10	17	46	\$2,224,550
2010-11	14		\$1,685,348
2012-13	19		\$1,886,203
2013-14 (estimated)	15	32	\$1,602,877
Difference	-2	-14	\$621,673

Source: Special education lists of schools, students and costs from 2009-10 through 2013-14.

Additional costs of mental health and residential services have transferred to school districts through Assembly Bill (AB) 114, which became law in June 2011. Under AB 114, several sections of Chapter 26.5 of the California Government Code were amended or rendered inoperative, ending the state mandate on county mental health agencies to provide mental health services to disabled students. 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.

In 2013-14, the district incurred room/board and mental health costs that were not included in the previous year's calculations. Therefore, to more accurately compare the NPS costs from 2009-10 to April 30, 2014, the known room/board and mental health fees were deducted from the 2013-14 data provided by special education.

As of April 20, 2014, the room/board and mental health fees for students in NPS was \$353,109. When the final bills are calculated, these fees may increase by as much as \$120,000. These funds are tracked separately by the business office, but are not budgeted to ERMHS. Coding all room/board and mental health costs associated with an NPS under ERMHS rather than special education would allow the district to carefully monitor these two expenditures and compare the two cost centers yearly.

District special education staff briefly reviewed with FCMAT the students in NPS placements to determine if enough students have similar needs to consider developing a district program. The staff could not identify enough students for such a program. Staff did identify specific students being considered for a current district program. In addition, one student is being considered for a change of placement into an NPS.

The Education Code definition for nonpublic agencies states, "Nonpublic, nonsectarian agency means a private nonsectarian establishment or individual that provides related services for an individual with exceptional needs to benefit educationally from the pupil's educational program pursuant to an individualized education program and that is certified by the department." (Education Code 56035)

District staff reported that the district's professional service contract is used for special education NPAs and independent contractors (IC). The business department is aware of the separate costs, and places all NPA and IC contracts in a separate cost center. The 2013-14 purchase order history through May 20, 2014 shows charges for NPAs and ICs of \$125,384.

Further review of each contract may be warranted to more accurately reflect which provide services to groups of students or individual students and whether any are the result of a resolution meeting or mediation. This information would enable the district to track costs for these services and determine if hiring staff rather than contracting would be both cost and programmatically beneficial.

In conjunction with the SELPA, the district receives ERMHS funds through AB 114 to cover the district costs for room/board and mental health services for students in NPSs and to provide mental health services to district special education students.

The district receives \$417,000 in federal mental health funds. The district is also the contractor for the NPA that provides therapy for the SELPA mental health intensive class. The contract for this service is \$519,000. The district receives a reimbursement of \$76,000 from the other districts that have students in the intensive class. The district's portion of the excess cost for this contract is \$26,000.

The district also receives \$805,000 in state mental health funds and expends the full amount. However, the district provides ERMHS that are not included in the mental health budget. The district coordinator and the NPAs that provide therapy to special education students in district programs are in the ERMHS budget. As stated earlier, the room/board and mental health costs for NPS students are not included.

In addition, the district has established mental health teams at each of its high schools and at Educational Options. These teams include the lead resource specialist, school psychologists, and a student advocate. The ERMHS budget does not include this entire staff. The document Educationally Related Mental Health Services Mental Health Teams was compared with the resource 6512 mental health budget. There are 2.17 FTE student advocate positions out of 4.97 FTEs and 3.8 FTE psychologist positions out of 5.2 FTEs that are not listed in the ERMHS budget. The district provided FCMAT with the average salary with benefits for this staff at \$100,000/FTE. Therefore, approximately \$597,000 in ERMHS services and staff is being charged to special education.

Available data cannot determine how effective the district's ERMHS programs are in keeping students in district programs and out of NPS placements. Anecdotal data provided by district staff suggests there may be sufficient savings in NPS costs. The average NPS placement for students with emotional disturbance based on the 2013-14 information provided is approximately \$80,000. The reduction of 14 students in NPS placements since 2009-10 suggests that the programs may be cost effective. However, this reduction could be for other reasons, and additional data must be considered to make this determination.

Through the local education agency (LEA) billing option, a district may submit claims to Medi-Cal for covered services provided to eligible children enrolled in special education programs. This allows school districts and/or county offices of education to receive federal funds to help pay for health-related special education and related services. A district can include psychologists, speech therapists, nurses, health aides, transportation, wheelchair buses, behavior specialists and mental health specialists in Medi-Cal billing.

The district does not contract with a Medi-Cal billing agent to bill for special education approved services. District staff reported this has been considered in past years, but it was felt there were not enough special education students eligible under Medi-Cal for the district to pursue reimbursement. With the additional possibility of reimbursement for mental health services, the district may want to consider Medi-Cal billing.

## Recommendations

*The district should:*

1. Develop written policies and procedures to clarify the process of referring a non-ERMHS student for an NPS placement.
2. Ensure that every IEP for an NPS student includes a transition plan for returning the student to a district program.
3. Ensure that all room/board and mental health costs for NPS students are budgeted to ERMHS rather than the special education budget so these costs can be accurately monitored.
4. Continue reviewing the NPS students at least once per year to determine if establishing a district class for groups of these students would be beneficial.
5. Establish budget codes that will enable monitoring of NPA and IC expenditures separate from NPS or general special education.
6. Review each NPA and IC contract to determine if any of the services could be provided more efficiently by district staff.
7. Determine staff that provide services under ERMHS and ensure that they are coded as such rather than to the special education budget so that the actual cost of providing ERMHS can be accurately calculated.
8. Develop criteria to determine if the current ERMHS are preventing NPS placements.
9. Contact two to three Medi-Cal billing agents to determine the cost of billing Medi-Cal for approved special education services and to estimate the income that may be generated by billing. If there is a cost benefit to the district, contract with a billing agent for the 2014-15 school year.

## Paraeducator Staffing

FCMAT was asked to review the procedures for identifying the need for 1-to-1 paraeducators and the need for continuing support from year to year.

District staff reported that 1-to-1 paraeducators are only requested when absolutely necessary. The district behavior specialists and psychologists do observations, collect data, and determine if other paraeducators or natural supports can provide the student with the required coverage prior to requesting a 1-to-1 paraeducator. Through the SELPA, the district can access the forms and process for determining the initial and continued need for a special circumstance instructional assistant (SCIA). District staff report that they rarely complete the SCIA forms because the process in use prevents unnecessary 1-to-1 paraeducator positions. These paraeducators are included on a student's IEP as an intensive behavioral service, which allows the district to track the individual and total number of students and the total 1-to-1 paraeducator FTE allocated.

District staff reported that students entering the 9th grade are more likely to be assigned a 1-to-1 paraeducator than students in grades 10-12. The district's unwritten policy has been to discuss at the 8<sup>th</sup>-to-9<sup>th</sup>-grade transition meeting the need for this service and how the student could be provided the necessary support without a 1-to-1 paraeducator. If it is decided to continue the position in the 9th grade, the district assigns the paraeducator for a short term to assist the student in the transition. In this case, the need for the 1-to-1 paraeducator is reviewed during the school year and at the annual IEP.

District staff also reported that the continued need for a 1-to-1 paraeducator is reviewed at the student's annual IEP, although without the level of observations and data collection required before an initial placement.

FCMAT was provided with the 2013-14 staffing information that included 1-to-1 paraeducator assignments. Seven students receive 6.38 FTE 1-to-1-paraeducator support. This is less than 0.1% of the total number of district paraeducators. Of those seven students, the district reported that three are in the process of reducing the amount of time assigned to the student. In addition, two students have physical disabilities that will continue to require this level of support, one is transitioning to an adult program and one receives this support due to behavioral needs.

## Recommendations

*The district should:*

1. With the exception of 1-to-1 physical paraeducators, ensure that SCIA forms are used to determine the need for 1-to-1 paraeducators.
2. Develop a process that documents when short-term 1-to-1 paraeducators are assigned, the length of the assignment, and where the paraeducators are assigned once the student no longer needs this service.
3. With the exception of physical 1-to-1 paraeducators, ensure that the relevant SCIA forms are completed at each annual IEP for students who have intensive intervention services on their IEP.

4. Develop a form that clarifies why a student receives 1-to-1 paraeducator services, when that position is reduced or eliminated, and the status of the reassigned paraeducator.

# Administrative Structure

## Administrative Functions

The special education department has three primary administrative positions. Information gleaned from staff interviews indicates that 50% of the administrative responsibilities for the director of special education are general education functions:

- Director of Special Education: Special education, home/hospital, nursing services, legal
- Coordinator of Special Services
- Program Administrator

There are also 2.8 FTE program specialists in the SELPA, of which the district is 30%. Their primary duties include site support, teacher training, and curriculum.

The nurse is funded 100% out of special education.

## Clerical Support Functions

The special education office includes the following clerical positions:

- Administrative Assistant: Timesheets and personnel requisitions, NPS and NPA contracts.
- Student Data Technician: Maintains student records, CASEMIS reporting, management information system for special education students. Translates all district IEPs requiring English to Spanish translation.

FCMAT analyzed the administrative structures in comparable size high school districts including Escondido, Sequoia and Acalanes. The level of clerical support in each district also was compared with the Fremont UHSD. Although comparative information is useful, it should not be considered the only measure of appropriate staffing levels. School districts are complex and vary widely in demographics and resources. Careful evaluation is recommended because generalizations can be misleading if significant circumstances are not taken into account.

The district has three administrators in the special education department while the other districts have one administrator. Many of the duties in other districts are also combined with pupil support services responsibilities. The number of program specialists was comparable to the Fremont UHSD in all districts reviewed. The average clerical support FTE in comparable districts was 2.2 FTE.

## Recommendations

*The district should:*

1. Set up monthly meetings with the special education director and nurses and home/hospital staff to discuss assignments, responsibilities, duties and other work related concerns.

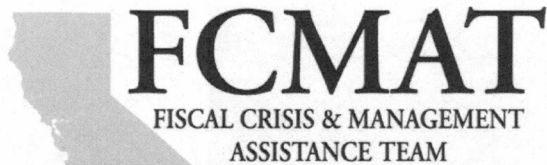
2. Continue to review the administrative staffing structure and make changes as appropriate based on its specific circumstances.



# Appendices

## Appendix A - Study Agreement





CSIS California School Information Services

---

**FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM  
STUDY AGREEMENT  
December 12, 2013**

The Fiscal Crisis and Management Assistance Team (FCMAT), hereinafter referred to as the team, and the Fremont 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 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 special education 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.
4. Review the special education transportation delivery system, including but not limited to, the role of the individualized education program (IEP), routing, scheduling, operations and staffing.

5. Review the use of resources allocated for nonpublic schools and agencies, mental health services and alternative programs and make recommendations for greater efficiency.
6. Review the efficiency of instructional aide staffing in special education programs. Analyze the procedures for identifying the need for 1-to-1 instructional aides, the process for monitoring and allocating instructional aide resources, and the need for continuing support from year to year.
7. Compare the special education administrative structure and support staff with districts of similar size and make recommendations for greater efficiency.

**B. Services and Products to be Provided**

1. Orientation Meeting - The team will conduct an orientation session at the district to brief district management and supervisory personnel on the 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, CICA, 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 Leader |
| B. Matt Doyle            | FCMAT Consultant                                    |
| C. Anne Stone            | FCMAT Consultant                                    |
| D. Trina Frazier         | FCMAT Consultant                                    |
| E. Mike Rea              | FCMAT Consultant                                    |
| F. Tim Purvis            | FCMAT Consultant                                    |

Other equally qualified staff or consultants will be substituted if 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 staff member while on site, conducting fieldwork at other locations, preparing and presenting reports, or participating in meetings. The cost of independent FCMAT consultants will be billed at their actual daily rate.
- 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 \$28,900.**

- 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. Existing policies, regulations and prior reports that address the study scope.
  - 2. Current or proposed organizational charts.
  - 3. Current and two prior years' audit reports.
  - 4. 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.
  - 5. Documents should be provided in advance of fieldwork; 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, where the district will 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).

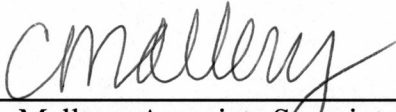
## 6. **PROJECT SCHEDULE**

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

**7. CONTACT PERSON**

Name: Christine Mallery  
Telephone: Associate Superintendent  
Fax: (408) 522-2245  
E-mail: [jeanie\\_mccune@fuhisd.org](mailto:jeanie_mccune@fuhisd.org)



Christine Mallery, Associate Superintendent  
Fremont Union High School District

December 12, 2013  
Date



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

December 12, 2013  
Date