



CSIS California School Information Services

Escondido Union High School District

Special Education Review

December 10, 2014



Joel D. Montero
Chief Executive Officer





December 10, 2014

Steve Boyle, Superintendent
Escondido Union High School District
302 North Midway Drive
Escondido, CA 92027

Dear Superintendent Boyle,

In February 2014, the Escondido 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. Determine the district's special education encroachment on the general fund and make recommendations for greater efficiency.
2. Evaluate special education transportation services.
3. Analyze staffing ratios and class and caseload size using the statutory requirements for mandated services and statewide guidelines.
4. Analyze all staffing and caseloads for designated instruction providers, including psychologists, occupational and physical therapists, behavior specialists, and others.
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 costs of due process and mediations for the past three years.
7. Review the efficiency of para-educator staffing. Analyze the procedures for identifying the need for instructional aides, and the process for monitoring the resources for allocating para-educators and determining the need for continuing support from year to year.
8. Review the process used to transition students from elementary schools to the district while ensuring that the least restrictive environment is provided and determining if services will be decreased or reduced.

FCMAT

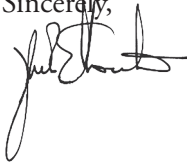
Joel D. Montero, Chief Executive Officer

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9. Review the process used to move a student from traditional special day classes to learning centers. Make recommendations for cost effectiveness, efficiency and improved learning opportunities for students.
10. Determine how the district can reduce deficit spending in special education and remain in compliance with the requirement to meet students' needs.

This final report contains the study team's findings and recommendations in the above areas of review. FCMAT appreciates the opportunity to serve the Escondido 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', with a stylized flourish at the end.

Joel D. Montero
Chief Executive Officer

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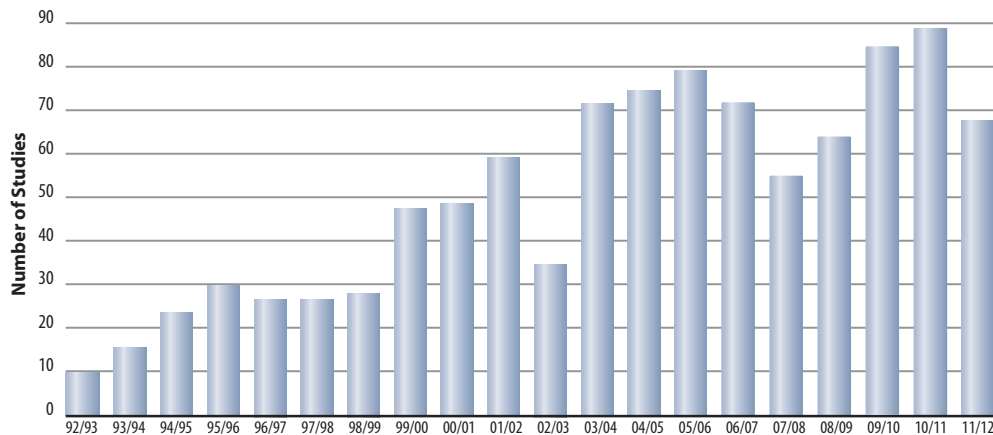
About FCMAT

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

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

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

Studies by Fiscal Year



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

AB 1200 is also a statewide plan for county 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

Escondido Union High School District is in the north inland area of San Diego County. The district essentially encompasses the geographic boundary for the city of Escondido and small portions of the unincorporated areas of San Diego County immediately adjacent to the city. The district covers approximately 107 square miles. Interstate 15 runs north-south through the district, with Lake Hodges at the southern border. The district is predominantly urban with some rural areas.

Study Guidelines

FCMAT visited the district on August 26-29, 2014 to conduct interviews, collect data and review documents. This report is the result of those activities and is divided into the following sections:

- Fiscal
- Transportation
- Staffing and Caseloads
- Nonpublic Schools and Agencies
- Due Process
- Instructional Assistants
- Transition from Feeder Schools
- Least Restrictive Environment

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:

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*As members of this study team, these consultants were not representing their respective employers but were working solely as independent contractors for FCMAT. Each team member reviewed the draft report to confirm accuracy and achieve consensus on the final recommendations.

Executive Summary

The district had an approximate enrollment of 9,303 students in grades 9-12 in the 2013-14 school year. The special education student population is approximately 800 in grade 9 through age 22 (transition program). There are three comprehensive high schools, one school for the arts and sciences (Del Lago Academy), and Valley Alternative Learning High School. The district has an in-house pupil transportation program mainly for its special education students requiring transportation as a necessary related service.

For 2014-15 and beyond, the North Inland Special Education Region (NISER) Special Education Local Plan Area (SELPA) has changed the allocation model related to distribution of the Out of Home Care (OOHC) apportionment. The 2014-15 allocation model provided by the NISER SELPA indicates that the district receives 63.5% of the OOHC funding versus 18.98% of SELPA average daily attendance (ADA) related funding. Thus any reduced allocations to the districts based on OOHC ratios has a greater impact on Escondido UHSD.

The district received approximately \$50,000 less in 2013-14 than in 2012-13 in Medi-Cal revenues. However, the number of special education students increased in 2013-14 from 2012-13. Staff stated this reduction occurred because not all staff submitted the required documentation for Medi-Cal reimbursement.

Approximately 800 district students have Individualized Education Programs (IEPs). Of these students, 147 have transportation identified as a necessary related service in their IEP. This is approximately 18.3%, which is a relatively high percentage compared to other districts FCMAT has studied. Except for one private transportation provider transporting one student to an out-of-district program site, all special education transportation is provided on district buses.

The district will receive \$103,031 in transportation funds for the 2014-15 fiscal year, which is similar to the prior few years. The district's unaudited actuals report identified approximately \$1,902,147 for all transportation expenditures for 2013-14. According to the 2013-14 unaudited actuals report, expenditures for special education transportation services were \$1,561,733. The district's state transportation revenue only covers approximately 5.4% of the district's total transportation costs, far under the state average of 35%. The district's special education transportation encroachment accounts for nearly 50% of the district's total special education encroachment.

FCMAT's review of various staffing reports that were generated manually and through computer programs 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 to complete its staffing analysis. Manually maintained data is often inaccurate, outdated, and more susceptible to human error. It is also more labor-intensive. The district does not use a position control system to monitor assignment of certificated and classified positions.

FCMAT reviewed district expenditures for nonpublic school (NPS) tuition, room and board for students in residential placements and for mental health counseling. The NPS costs decreased from \$813,334 in 2012-13 to \$442,882 in 2013-14. The room and board and mental health counseling costs also decreased from \$1,049,275 in 2012-13 to \$494,111 in 2013-14. This was because the district returned students to district programs, therefore reducing the number of students in NPS placements. The total one-year savings for these contracts is \$925,616.

The district reported that it lacks account codes that would enable staff to track either the legal costs paid to an attorney for parent representation or for specific settlement agreements. Therefore, the information available to FCMAT was limited.

The average number of instructional assistants assigned to classrooms is .5 per class higher than School Services of California (SSC) recommends. However, the SSC calculation does not consider specific needs such as wheelchairs or medical needs. The class sizes are the average size recommended by SSC. This level of staffing costs the district an additional \$288,648 per year based on the SSC recommendations.

The district coordinates with each feeder school to transition 8th grade students to the appropriate high school site for 9th grade, but lacks a consistent and clearly articulated transition process and procedures. Each high school utilizes a transition process, but inconsistencies have led to a lack of appropriate transition IEPs.

Findings and Recommendations

Fiscal

Contributions from the district's unrestricted general fund to its special education program include:

	2011-12	2012-13	2013-14
Special Education--Resource 6500	\$ 1,150,779	\$ 1,831,469	\$ 1,581,917
Special Education Transportation Resource 7240 (2011-12 and 2012-13, Fund 06. 2013-14 Fund 03, Resource 0983-000)	\$ 1,280,644	\$ 1,381,327	\$ 1,455,604
Total Contribution	\$ 2,431,423	\$ 3,212,796	\$ 3,037,521
Total Special Education Expenses	\$ 14,106,459	\$ 15,101,878	\$ 15,048,846
Contribution Percentage	17.2%	21.3%	20.2%

Sources: District SACS Form SEMA reports

Contribution percentages for other districts in the NISER SELPA, based on 2012-13 SACS Form SEMA Actual Expenditure reports provided by the NISER SELPA are:

Borrego Springs	11.2%
Escondido Elementary	18.8%
Escondido High	21.3%
Julian Elementary	0.0%
Julian High	0.0%
Ramona	29.2%
San Pasqual	0.0%
Spencer Valley	0.0%
Valley Center	27.2%
Warner	5.3%

For the 2014-15 fiscal year and beyond, the NISER SELPA has changed the allocation model related to distribution of the OOHHC apportionment. The 2014-15 allocation model provided by the NISER SELPA indicates that the district receives 63.5% of OOHHC funding, versus 18.98% of SELPA average daily attendance (ADA) related funding; thus, any reduced allocation of OOHHC funding has a greater impact on Escondido UHSD.

The percentage of OOHHC funding provided from the NISER SELPA apportionment, split between Escondido UHSD and the San Pasqual Union School District, was reduced from 89% of the total in 2013-14 to approximately 80% in 2014-15. This results in an annual loss of approximately \$100,000 in revenue to Escondido UHSD in 2014-15 and beyond.

Starting in 2014-15, the small district high cost pool and SELPA coordinator adjustment are funded based on the total OOHHC allocation rather than on Assembly Bill (AB) 602 funding (ADA allocation) as was done in previous years. This results in an additional annual loss to the district of approximately \$75,000 in 2014-15 and beyond.

For the 2014-15 fiscal year forward, the NISER SELPA has changed the allocation model related to distribution of Individuals with Disabilities Education Act (IDEA) Local Assistance, Resource

3310. The previous model distributed these funds to member districts based on their percentage of the total SELPA ADA, but now the distribution is based on each district's count from the California Special Education Management Information System (CASEMIS) as a percentage of the total SELPA CASEMIS count. The financial impact of this change in allocations will be phased in over two years. Per figures provided by the SELPA, the Escondido UHSD will lose revenue of \$129,986 in 2014-15, \$259,971 in 2015-16, and then the larger amount each year thereafter.

Beginning in 2014-15, the Classical Academy High School, a district-authorized charter school, is moving its special education services from the NISER SELPA to another SELPA. The annual financial impact to the district of this action is:

- a. Loss of approximately \$300,000 in special education revenue. Given that expenditures total approximately \$270,000 for Classical Academy High School, this will result in a net loss of \$30,000.
- b. Approximately \$100,000 of the \$270,000 in services provided to Classical Academy High School will continue, for which the district will be reimbursed.
- c. The remaining expenses of approximately \$170,000 are for certificated salaries and related benefits that will continue in 2014-15, again at a loss to the district. If those services are laid off for the 2015-16 year, the district can eliminate that portion of the loss.

The total losses in revenue to the district as listed above are estimated to be \$504,986 in 2014-15 and \$464,971 in 2015-16 and beyond, as long as unnecessary services previously provided to Classical Academy High School are discontinued.

Staff state the district lacks a position control system. The San Diego County Office of Education is implementing a comprehensive new financial and human resources software system (PeopleSoft) that will incorporate position control. Implementation for the Escondido UHSD is expected by July 1, 2015.

Special education certificated salaries increased by 6.7% from 2011-12 to 2012-13, and an additional 6.0% from 2012-13 to 2013-14, outpacing cost of living and step and column increases. The increase in certificated salaries over these two years totals \$328,379. Staff state this is because programs were added, such as for autistic and emotionally disturbed students, to reduce placements outside of district programs.

The increase in district programs and a reduction in the number of students needing such services have reduced expenditures for mental health room and board sub-agreements and services from \$1,049,275 in 2012-13 to \$494,111 in 2013-14. Nonpublic school contract costs have decreased from \$813,334 to \$442,882 during the same period. The total one-year savings in room and board and nonpublic school contracts is \$925,616.

The district has changed its account coding to separately track expenditures for San Diego COE joint court and community schools excess costs (\$182,986 in 2013-14) and reimbursement to the county office for San Pasqual Academy services (\$190,000 in 2014-15).

Medi-Cal

Medi-Cal revenue dropped to \$54,042 in 2013-14 from \$109,640 in 2012-13. However, the number of special education students increased in 2013-14 from 2012-13. Staff reported that this revenue reduction occurred because not all staff submitted the required documentation for Medi-Cal reimbursement.

The person responsible for monitoring Medi-Cal billing is not a district employee. Each district is required to have a consortium that meets regularly to review the Medi-Cal billing and provide the district with recommendations for expenditures. The district has documentation for the required consortium; however, staff reported that it does not meet.

The special education staff who have completed or could complete the documentation for Medi-Cal reimbursement have not been involved in determining expenditures and report that they do not know how the monies they generate are expended. District staff reported that not all staff that could generate reimbursements are doing so, and those who are completing Medi-Cal documentation do not have a clear understanding of the importance of maximizing these reimbursements.

Recommendations

The district should:

1. Continue to monitor and compare its unrestricted general fund contribution percentage to other districts both in the SELPA and statewide.
2. Work with the Superintendent's Council for the SELPA to prevent any further erosion of funding.
3. Closely monitor services provided to, and reimbursement received from, Classical Academy High School to ensure full reimbursement. Closely monitor the school's certificated positions and initiate layoff procedures, if appropriate.
4. Review Medi-Cal coding and billing to ensure reimbursement is received for all appropriate expenditures, such as school psychologists, social workers, severely handicapped/medically fragile classes and related nurses, and Educationally Related Mental Health Services.
5. Combine efforts of the Business Services, Human Resources and Special Education departments to begin a position control system in the current year. Hold meetings at least quarterly to review all new, replacement and discontinued positions to ensure proper staffing levels.
6. Monitor the new programs that have resulted in decreased expenditures to ensure ongoing efficiency. Continue to seek further efficiencies in this area. Examine the efficiency of the services provided by the county office joint court and community schools, as well as the San Pasqual Academy, to ensure that sufficient value is received from these programs.

7. Assign a district employee, such as a special education budget analyst, to develop procedures and monitor special education staff to maximize Medi-Cal reimbursement.
8. Discuss with the district's Medi-Cal billing agent how to maximize Medi-Cal reimbursement.
9. Develop the required consortium to review Medi-Cal billing, and set a consortium meeting schedule.
10. Ensure that all staff who can generate Medi-Cal reimbursement are doing so.

Transportation

School Transportation Finance

School transportation is one of most underfunded areas of California's education budget. Prior to 1977, school transportation was fully funded. School districts would report their operational costs and were fully reimbursed in the subsequent school year. After the adoption 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. In that year the state capped the reimbursement at the level of costs the school districts reported, only occasionally granting a cost of living adjustment since that time.

Over the past 31 years, costs have risen significantly, demographics have changed and the need for special education transportation has increased significantly. From 2008 through the 2012-13 school year, the amount each school district has received for transportation has been reduced by approximately 20%.

In the 2013-14 school year California adopted the Local Control Funding Formula (LCFF). School transportation has been funded at the same level as the prior year appropriation. In addition, the funding was structured as an add-on to the base grant received by each district. It can only be utilized 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 35% of the funding necessary for school transportation, based on school districts' reported approved costs.

For the 2014-15 fiscal year and beyond, expenses for student transportation will not be tracked under the prior SACS resource codes of 7230 for home-to-school and 7240 for severely disabled/orthopedically impaired (SD/OI). It will no longer be required to specifically report transportation data or populate and submit the prior state TRAN report. However, most county offices of education (COEs) are suggesting that transportation expense continue to be separated for home-to-school and SD/OI utilizing the COE's generated resource codes. The San Diego COE has identified resource account codes of 0982-000 for home-to-school and 0983-000 for SD/OI expenses to be tracked.

The district will receive \$103,031 for the 2014-15 fiscal year, which is similar to the prior few years. The district's unaudited actuals report identified expenditures of approximately \$1,902,147 for all transportation service for the 2013-14 school year. District source documentation shows 2013-14 unaudited actuals expenditures for special education transportation of \$1,561,733.

The state transportation revenue covers approximately 5.4% of the district's total transportation costs, far under the state average of 35%. The district's special education transportation encroachment accounts for nearly 50% of the total special education encroachment.

At the time of FCMAT's on-site visit, student transportation data supplied from the district's transportation routing software, TransTraks, indicated that approximately 147 special education students are transported on 10 district buses. This is a bus loading factor of approximately 14.7 students per bus route, which is relatively good. A discrepancy in student data was found between the district's electronic routing data and a fiscal audit performed using the school bus routing sheets for each of the 10 dedicated special education bus routes. The route sheets showed approximately 74 students transported on a.m. bus routes and 79 transported on p.m. bus routes.

Approximately 800 district students have Individualized Education Programs (IEPs). Of these students, 147 have transportation identified as a necessary related service in their IEP. This is

approximately 18.3%, which is a relatively high percentage compared to other districts FCMAT has studied. The district's routing sheets revealed that approximately 119 special education students are transported. The difference of 28 students reduces the above-mentioned per-bus load factor of 14.7 students down to 11.9 students per route, still slightly above most operations that FCMAT has recently reviewed. The lower number of special education students receiving transportation as a related service reduces the IEP identification for transportation to approximately 14.8%, slightly higher than most organizations recently examined by FCMAT.

The 2012-13 district-filed state TRAN report shows a cost of approximately \$15,735 per student, per year to transport students on district buses. SOL, a local private vendor that offers ambulatory and wheelchair transportation, has transported some special education students. This transportation cost is approximately \$30,000 per student, per year.

The district reports that at this time only one parent transports their student and is paid to do so in lieu of district-provided transportation service. The district rarely contracts with parents to transport their student. However, an in-lieu transportation contract is utilized when this occurs.

Using the district's 2013-14 transportation unaudited actual expense and adjusting the number of students transported from 147 to 119, a more realistic cost per student for the 2014-15 fiscal year is \$13,387.59. The most recent California Department of Education statewide average available was for the 2010-11 school year, and it shows a statewide average for SD/OI cost of \$6,426.36.

The district's projected expense for 2014-15 is more than double the statewide average and is one of the highest costs per student recently reviewed by FCMAT. The district should critically examine all related special education costs in the transportation program to determine if actual related expenses are appropriately applied.

District transportation expenses are not separated between home-to-school, SD/OI and other related transportation service such as extracurricular and co-curricular activity trips. As a high school district with three comprehensive high schools, the district has a significant amount of athletic transportation support and related expenses. If a district special education driver works a field trip, the associated salary for the field trip is coded as a special education expense.

This gives the impression that special education transportation costs are greater than they actually are. The field trip revenue or internal budget transfers from the school sites are returned to the district's regular education transportation budget expenses from the accounting related to extracurricular and co-curricular activity trips.

Recommendations

The district should:

1. Examine all special education costs in the transportation budget to ensure they are properly applied.
2. Ensure that students receiving transportation support as a related service are accurately reflected in the district's routing software system and routing sheets.
3. Consider separating the accounting for home-to-school, SD/OI special education and other related expenses from the accounting related to extracurricular and co-curricular activity trips.

Routing Efficiency

For the 2014-15 school year, the district operates 10 special education bus routes and one general education bus route. Two of the district's special education routes also provide transportation for the Del Lago Academy. This is an efficient use of district fleet resources, with only moderate additional operational expense and driver labor time.

District-supplied routing sheets showed 79 special education students scheduled on 10 special education bus routes, as follows:

Route No.	AM Students	PM Students
1	10	12
2	12	5
3	9	12
4	11	11
5	4	7
6	8	7
7	7	8
8	General education	
9	1	1
10	6	8
11	6	8
Total	74	79

District bus routing appears to be generally efficient. There is some evidence on the district's routing sheet of paid stand-by time; however, this is a common practice in most transportation operations because special education student routing often requires students to be picked up at individual stops (often the student's home) and delivered to one or more program sites. Removing a single student from the route sequence alters the route timing, resulting in stand-by time for the driver.

Often, it is not practical to adjust the entire route for individual student pick-up times because it will not significantly increase routing efficiency and disrupts student and parent schedules. Often, increases in special education students will naturally backfill these openings. However, depending on collective bargaining agreement language or other district routing practices, the district may achieve some labor savings through routing optimization.

Drivers are provided 30 minutes (some route sheets indicate slightly more) to perform their daily pre-trip bus inspection.

A discrepancy of 28 students exists between the electronic routing software and individual routing sheets compared to the districtwide routing sheets. The reduced number of students transported, however, only resulted in a special education busload difference of approximately three students per bus. An audit of student data in the routing software and the actual number of students shown on published route sheets could determine the source of the discrepancy.

The district's special education program staff has worked aggressively to bring back some students in nonpublic school settings to district programs. Retaining the highest number of students in district programs is among one of the greatest efficiencies that can be achieved in controlling special education transportation expense.

The transportation staff appears to be universally respected for their student-oriented support, quick turnaround of student scheduling and rapport with staff and parents.

During the 2013-14 school year, two students were transported by SOL Transportation, a local ambulatory and wheelchair transportation vendor. According to district invoices reviewed for May 2014, this cost approximately \$30,000 per student for the regular school year (not including service provided for the summer extended school year). Currently, only one student is contracted for private transportation.

Although private transportation is quite expensive, the number of students transported was low, and the decision by the IEP and transportation teams to choose this mode of alternative transportation support may be most cost effective over hiring an additional school bus driver and implementing an additional route because the duration of time for the alternative transportation is not known. Special education student program assignments can change, and students can move or transfer schools with little notice.

The district lacks a formal service contract for external transportation vendors. A formal transportation contract can help ensure safe conditions for student transportation, including that appropriate and safe drivers are employed, that Department of Motor Vehicles (DMV) driver record pull notices are monitored, fingerprinting and a thorough background investigation are completed, and that the operator is registered and performs both pre-employment and random drug and alcohol testing.

The district currently pays one parent to transport their student using a standard parent in-lieu transportation contract. The district pays the standard IRS per-mile reimbursement, and payment is based only on the take and return mileage, not round-trip mileage each morning and afternoon. This is a standard practice. The district appears to utilize parent in-lieu transportation contacts infrequently.

District Board Policy 3541 states that all students residing more than three miles from their school of assigned attendance can receive district transportation. However, in practice, the district has nearly eliminated all home-to-school general education transportation. Although not specific to the scope of this study, it is suggested that the district revise its general education transportation support policy to better reflect the current practice.

Recommendations

The district should:

1. Perform a routing optimization to potentially achieve some labor savings.
2. Audit the student data in the routing software versus the number of students identified on published route sheets to determine the source of the discrepancy.
3. Continue to assess each out-of-district transportation need separately and determine the most cost effective manner to transport based on available resources.
4. Generate formal service contracts for all private transportation vendors.

Vehicle Maintenance and District Fleet

The California Highway Patrol Motor Carrier Inspector division must inspect every school bus in the state annually. Additional inspections are performed and summarized in a report titled, “Safety Compliance Report/Terminal Record Update,” more commonly referred to as the terminal grade. As a part of this inspection they randomly inspect buses, vehicle maintenance records, driver time records, driver DMV pull notice records and federal drug and alcohol testing records. The district transportation program consistently receives CHP’s highest grade, which is “satisfactory.” The district’s bus fleet appears clean and newly painted.

The district identifies 19 school buses on its fleet list. Approximately 11 of these units are designated for special education transportation use, and all have wheelchair access.

In addition, the district has eight larger size buses for home-to-school and extracurricular and co-curricular activity trip support and backup spare units. This is an adequate number of spare large buses; however, the district should review options for purchasing one to two additional used or new special education school buses.

Over the years, the district has reduced the number of regular education bus routes. The district has aggressively sought and secured grants from the San Diego Air Pollution Control District and the California Energy Commission for fleet modernization and fueling infrastructure. The district retains some older large buses that may be eligible for replacement through grant funding.

The average bus age is 10.63 years; this is a relatively new fleet.

In addition to the fleet of 19 school buses, the transportation program provides vehicle maintenance for an additional 14 district vehicles. However, the program does not maintain about 15 other Maintenance & Operations (M&O) vehicles. Current practice and immediate past history is that the M&O vehicle general repairs are performed under contract with an external vendor.

The transportation program employs two vehicle mechanics and could easily maintain an additional 15 district vehicles. This would reduce the outside repair expenses for these vehicles.

The two district mechanics work similar shifts; one mechanic arrives at 4:30 a.m. and the second at 6 a.m. The mechanic reporting to work at 4:30 a.m. completes his shift by 1 p.m., and the other mechanic completes his shift by 2:30 p.m. As a result, the shop is unstaffed from 2:30 p.m. through the general office closing at 5:30 p.m. The district’s last daily special education school bus route returns at approximately 5:20 p.m., leaving the program without an assigned mechanic on duty for almost three hours.

The district also performs a high level of extracurricular and co-curricular activity trips. As a high school district, many of these trips are early afternoon and evening trips for athletic events.

The hours of coverage in the vehicle maintenance program could be expanded by having the second mechanic report for assignment around 8:30 a.m. or 9:00 a.m., allowing coverage through the general office closing time of 5:30 p.m. Staff reported that the mechanics are “on-call” for service; nonetheless, this practice exposes the district to unnecessary overtime costs in the mid to late afternoon time frame. Additionally, both mechanics reported working for other commercial carriers or for themselves performing other commercial vehicle maintenance.

Staff reported that the district has a past practice of supplying tools for mechanics in the vehicle maintenance program and that, at some time in the past, the district had more tools in its inventory than it does today.

Currently, both district mechanics supply most or all of their tools. Staff reported that some large tools and some hand tools, approximately 10%, are district supplied. In addition, one mechanic utilizes his commercial mobile maintenance truck. FCMAT observed that this truck is parked outside the district's vehicle maintenance bays on district property, with compartments open for regular and easy access to the mechanic's personal tools. Both practices of supplying tools are common in pupil transportation maintenance; however, district-supplied tools are more common. Either way, regularly scheduled tool inventories will help accurately reflect personal or district owned and supplied tools.

Parking and accessing a personal mobile repair vehicle immediately adjacent to the shop bays and on district property lends itself to questions regarding the commingling of district and personal property. Personal vehicles should be parked in staff parking areas.

The district secured local grant funding to purchase and install an above-ground 2,000-gallon diesel storage tank and pump. However, access to diesel fuel is relatively unmonitored. Pump access is provided to all drivers who are assigned a key; however, the lock is removed during general operating hours and presumably locked after hours.

The district does not formally record fuel usage by vehicle, and lacks an electronic fuel management system. All diesel fuel purchases are invoiced to the transportation program although the district has at least two non-transportation diesel vehicles in its fleet.

The district lacks an approved engine steam cleaning or vehicle wash and recovery area. Mechanics drive buses to a local commercial wash site that has an engine steam-cleaning bay with a pressure washer to accomplish this necessary preventative maintenance function. An outside vehicle wash vendor is contracted to wash the district's buses. Staff reported that the vendor follows best practices in meeting county storm water runoff requirements by creating a berm around vehicles being washed and recapturing residual water. For the size of the district's fleet, both practices are cost effective; however, the practice of steam cleaning vehicles off site is time consuming.

The vehicle maintenance staff could benefit from regular ongoing training specific to district fleet engines and ever-changing electronic engine diagnostics. In addition, there are many component-specific trainings and in-services that are recommended under best practices for items such as air conditioning certification, air and hydraulic braking system certification, wheelchair certification, etc.

Title 13 of the California Code of Regulations, Section 1232 requires inspection of school buses every 45 days or 3,000 miles, whichever comes first. The district inspects its buses both through the electronic vehicle maintenance software and manually. The district monitors its school bus safety inspections and preventative maintenance schedules adequately. The electronic tracking is performed by the program director, who provides inspection schedules to the mechanics.

Shop staff report that they do manual tracking as well, although the shop has the necessary computer software available for tracking. It may increase efficiency to train shop staff to operate the vehicle maintenance software. This could also increase the efficiency of generating vehicle work orders and of inventory control, because parts that are purchased for inventory are not electronically tracked.

Recommendations

The district should:

1. Review options for purchasing one to two additional used or new special education school buses.
2. Incorporate the 15 M&O vehicles into the district's transportation vehicle maintenance program.
3. Consider expanding the hours of vehicle maintenance coverage by having the second mechanic report later in the morning, thus allowing coverage through the general office closing time of 5:30 p.m.
4. Regularly schedule and complete tool inventories to accurately reflect personal or district owned and supplied tools.
5. Direct all transportation program staff to park their personal vehicles in staff parking areas.
6. Purchase an electronic fuel management system or institute manual record keeping of all district diesel fuel usage, tracked by vehicle and staff member.
7. Further explore ongoing training and engine diagnostic in-service and trainings for the vehicle maintenance staff.
8. Provide training to the shop mechanics on the vehicle maintenance software and transition to a fully electronic work order and maintenance system for preventative maintenance schedules and inventory tracking.

Staffing Structure

The district's transportation program is small compared to many other high school districts. The reporting structure is minimal, but sufficient to meet the responsibilities of the program. A full-time director of transportation is supported by a full-time dispatcher who works a split shift. This allows the dispatcher to be on duty during the morning hours when routes are on the road and again in the afternoon when routes are returning students home from school.

Also, the dispatcher's split shift allows the position to be on duty when most of the district's mid- and late-afternoon activity trips are in progress. The program's 6-hour/12-month bilingual clerk assists greatly with the district's large Spanish-speaking population. As stated earlier, the district has two vehicle maintenance mechanics.

The transportation program has four bus aides; three are assigned to a single bus route as 1-to-1 aides for specific students attending the Terri Incorporated program outside the district boundaries. A second bus route has a single bus aide. Two additional aides are assigned on bus routes for medically fragile students. It appears they are classroom aides who have had their work assignments increased to include staying with their assigned student on the bus.

In total, the district's 10 special education bus routes have six bus aides; this is a very high ratio compared to recent special education program reviews performed by FCMAT.

If a special education student requires an aide to assist in transportation, many programs will specify on the IEP plan that the student will be transported on a bus that has one aide. This

eliminates multiple aides riding a single bus to assist only the one student assigned to them. An exception to this may be if a student requires medical assistance.

Recommendation

The district should:

1. Review the assignment of individual aides to students for transportation.

Driver Training

The district's director of transportation is a state-certified driver instructor, which is appropriate for a program of this size. Training a school bus driver as a delegated behind-the-wheel or state-certified instructor would free the director from the required record keeping and classroom in-service for school bus drivers and other district commercial drivers. This position could be utilized as needed.

The transportation program has been able to successfully recruit and hire certified school bus drivers. The director has not had to train original candidate drivers for school bus operation since arriving at the district. Additionally, the director does not facilitate renewal classes for the district school bus drivers because neighboring districts have large safety and training programs.

Hiring already certified school bus drivers and arranging for renewal training through other agencies is working well for the district and is commonly done in programs of this size. Staff reported there are very few driver ride check performance reviews and very little behind-the-wheel renewal training. If the district sponsored one of its drivers for certification as an instructor, initial certification and renewal training could be done in-house if desired, along with managing the drivers' training records, medical certificates, behind-the-wheel ride checks and ongoing behind-the-wheel training as needed.

Specific special education in-service training is provided to the district's school bus drivers through the special education program staff. This is excellent specialized training and the drivers have found it very pertinent and helpful.

Recommendation

The district should:

1. Consider having a school bus driver undergo training as a delegated behind-the-wheel or state-certified instructor.

Staffing and Caseloads

Overview

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 to complete its staffing analysis. Manually maintained data is often inaccurate, outdated, and more susceptible to human error. It is also more labor-intensive. The district does not use a position control system to monitor assignment of certificated and classified positions.

Recommendation

The district should:

1. Establish objective staffing criteria and monitor the following data monthly:
 - Caseloads and class sizes of all service providers and teachers using a carefully maintained database. Include lists by school, service delivery option and teacher, to be shared with special education staff and school principals.
 - The number of instructional assistants, especially before new staff is added.
 - All related services caseloads including psychologists, speech language pathologists, adaptive physical education, etc.

Special Day Classes – Moderate/Severe (M/S)

The district operates 12 moderate/severe classes for students requiring a special day class setting. School Services of California (SSC) recommends staffing for M/S classes at 10-12 students with one teacher and two aides. This recommendation does not take into account specific student needs that can require a lower ratio such as the number of wheelchair students or students needing tube feeding. Based on the 2013-14 data provided by the district, there were eight M/S classes with a higher adult/student ratio, one class that had a lower adult/student ratio and three classes with the recommended adult/student ratio. The average class size was 9.8, which is slightly below the recommended levels.

The district also operates four transition classes, for students ages 18-22. This program supports vocational, community and job development. Based on 2013-14 district data, the transition program included four teachers with 54 students. The average class size was 13.5. There are no specific recommended ratios for transition programs. This program also includes two job coaches. The program utilizes two job developers employed by the district.

Mild/Moderate Services

The district utilizes a service delivery model that allows students to receive specialized academic instruction from a minimum of one period per day to six periods per day, depending on the needs of each individual student with an IEP. Students are not served in a mild/moderate special day class, but are served according to IEP and class schedule.

Mild/moderate programs have no statutory or recommended caseloads. Therefore, the district may determine how to maximize teacher caseloads. According to district documents, 595 students were served through this model during 2013-14. There were 23 mild/moderate teachers with an average caseload of 25.87 students.

Recommendations

The district should:

1. Continue to carefully monitor the caseloads of the moderate/severe classes.
2. Continue to carefully monitor the caseloads of the mild/moderate program.

Designated Instruction Providers

Psychologists

The district employs 3.0 full-time equivalent (FTE) psychologists providing services to special education and general education students. One additional psychologist is assigned to nonpublic schools and programs for students with emotional disturbance. This position is funded through Educationally Related Mental Health Services. SSC does not make a recommendation for psychologist staffing.

The May 2014 KidsData.org report recommended a ratio of 1,469 students per psychologist. The Special Education Opportunity Report of May 2011 recommended a ratio of 1,892 students per psychologist. Based on the information in Data Quest, the district had 9,303 students in the 2013-14 school year for a psychologist to student ratio of 1-to-3,101. To meet the Kids Data ratio, the district would need an additional 3.3 psychologists at a cost of approximately \$380,000. To meet the Special Education Opportunity Report ratio, the district would need an additional two psychologists at an approximate cost of \$230,000.

Districts frequently utilize psychologist interns to support the credentialed school psychologists. Site and district staff reported that for the last several years the district has hired paid psychologist interns and, at times, practicum students. Staff reported that this reduced the heavy workload. Neither of these types of positions has been filled for the 2014-15 school year. The approximate cost for three interns is \$39,000.

In addition to providing initial and triennial assessments, the psychologists also often attend the student study team meetings. Staff reported that a psychologist attends so assessment plans are developed only when necessary. The psychologists are also responsible for the primary development of behavior support plans as well as Special Circumstance Instructional Assistance assessments.

Speech and Language Pathologists

The district employs speech pathologists through a certified nonpublic agency (NPA). The NPA speech contract for 2014-15 is \$420,000, or \$84,000 per FTE. Although the district does

not track the FTE of the contracted speech and language pathologists, staff reported the NPA assignment would equate to five district FTEs. Based on district data, the average caseload for the pathologists was 92.4 students. The statutory requirement for speech and language pathologists is a SELPA-wide average of 1-55 students (Education Code 56563.3). Based on the statutory requirements, the district is understaffed by 3.4 FTE. For this report, a district speech therapist salary was based on the average social worker salary (including benefits) of \$104,000. Because the district does not have speech pathologists on staff, the social worker salary schedule is the most comparable. Hiring district speech therapists could cost the district an additional \$20,000 per FTE.

Site and district staff reported that many of the students on the speech caseloads are seen in a consultation model for as little as 30 minutes a year or 10 minutes a month. The district chooses to include these students on the speech pathologists' caseloads when it is not required to do so. This inflates the caseloads. Data is not available at this time to determine how many students receive this limited consultation and therefore could be removed from the caseloads.

Other Specialists/Personnel

The district employs a .6 FTE behavior specialist. This position serves only students on the autism spectrum at specific school sites. There are no statutory caseload requirements for behavior specialists; however, staff reported the district's behavior specialist serves 35 students. Increasing this position to 1.0 FTE would allow it to provide behavior plans and behavioral support to non-autistic students at all of the comprehensive high schools. This would reduce the responsibilities of the school psychologists and therefore reduce the need to increase the psychologist FTEs. Increasing the behavior specialist to 1.0 FTE would cost approximately \$36,000.

The district contracts for occupational therapy services. The contract is considered to equal 1.0 FTE at a cost of \$50,000. There are no statutory caseload requirements for occupational therapists. The Association of Occupational Therapists recommends a caseload of 45. Using the current teacher salary with benefits of \$85,000 as an estimate, hiring a district occupational therapist could cost the district an additional \$35,000.

District data shows that the occupational therapist has a 2014-15 projected caseload of 61. Again, these services are a combination of direct services and consultation. Data was not available to determine how many students received direct service or consultation only. It is not required to include consultation students in caseloads.

The Special Education Department employs one secretary, one director and three program specialists. In addition to supporting this staff, the secretary is responsible for monitoring contracts, personnel charts and lists, transportation, purchase orders, etc.

Recommendations

The district should:

1. Recruit psychologist interns and practicum students for the 2014-15 school year to reduce the need to increase psychologist FTEs.
2. Develop policies and procedures for determining when consultation services are included on a related service provider's caseload and reduce those caseloads before determining the need for any additional staff.

3. Determine if it is cost effective for the district to hire speech therapists as district employees or to continue to contract with an NPA.
4. Determine if the behavior specialist position should be increased to 1.0 FTE to provide additional services.
5. Consider alternative processes and procedures including professional development to train school staff on the development of behavior plans and Special Circumstance Instructional Assistance assessments. This would reduce the psychologists' responsibilities.
6. Determine whether it is cost effective to hire an occupational therapist or continue contracting with an NPA.
7. Consider hiring a special education budget analyst following a comparison of like districts' special education secretarial staffing.

Nonpublic Schools and Agencies

Nonpublic Schools (NPS)

“Nonpublic, nonsectarian school means 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.” (EC 56034)

When a district determines it does not have the appropriate educational placement or related service for a specific student or cannot hire staff to provide related services to district students, it may contract with an NPS or NPA. The NISER SELPA assists with this process by providing the NPS and NPA contracts and negotiating rates for its member districts.

FCMAT reviewed the district’s expenditures for NPS tuition, room and board for students in residential placements and mental health counseling for residential students. NPS costs decreased from \$813,334 in 2012-13 to \$442,882 in 2013-14. The room and board and mental health counseling costs also reduced from \$1,049,275 in 2012-13 to \$494,111 in 2013-14. This was because the district returned students to district programs, thereby reducing the number of students in NPS placements.

District Students in Nonpublic Schools 2012-13 to Date

Year	No. in Residential Placement	No. in Day NPS	Total
2012-13	8	29	37
2013-14	4	21	25
2014-15 to date	1	11	12
Reduction	7	18	25

Staff reported that the students who transitioned from NPS placements have been successful in the district programs. However, the IEPs for the students who are currently in NPS placements do not include a transition plan and specific goals for the student to return to a district program.

The district’s Business Department provided the NPS costs listed above. When the documents provided by special education were calculated they did not align with the Business Department data. Further, the Business Department’s budgeted estimates for nonpublic day and residential programs do not align with the current data provided by the Special Education Department.

Staff reported that the Business Department is not consistently informed about new or additional NPS costs. For example, the Business Department did not know there was a student in a residential NPS for the month of July. Further, since an increase of less than 10% of an NPS total contract is not required to be placed on the board agenda, the Business Department may not be aware of the increase until invoices are received. The district has a process for special education to notify the Business Department of any changes in NPS costs, but staff reported that this does not consistently occur.

Nonpublic Agency (NPA)

The district does not use the SELPA NPA contract for all of the contracted NPAs. Some NPAs are under work agreements, which is not as robust a contract. An agency must be on the state-approved list to be an NPA. This assures the district that the agency has met certain criteria including staffing credentials and insurance. Further, the coding for NPA contracts and work agreements is commingled.

The district provided FCMAT with the following NPA and work agreement contracts. The district reported that this may not be all of the contracts and that the contract amounts are estimates. The last contract listed, support for programs, is paid from a different funding source, Educationally Related Mental Health Services (ERMHS), which restricts how the money can be expended. The contracts provided total \$1,058,000.

Nonpublic Agency Contracts for 2014-15

Type of Service	Cost
Nursing	\$96,000
Music Therapy	\$20,000
Interpreting (Sign Language)	\$140,000
Mental Health Counseling	\$40,000
Autism	\$42,000
Speech and Language	\$420,000
Occupational Therapy	\$50,000
Support for programs serving students with emotional disturbance	\$250,000
Total	\$1,058,000

Without separate coding for NPSs, NPAs and work agreements, it is not possible to accurately track the costs involved in each of these costly services. The ability to track costs enables the district to determine when it is both cost efficient and programmatically beneficial to develop district programs rather than placing students in an NPS and/or hiring district staff.

The district has developed account codes to track expenditures for the program and services provided to its special education students by the San Diego COE.

Mental Health

As noted earlier, one of the NPA contracts is paid through ERMHS funds. Additional costs of mental health and residential services have transferred to school districts through AB 114, which was signed into law on June 30, 2011. Under AB 114, several sections of the Government Code, Chapter 26.5 were amended or rendered inoperative, ending the state mandate on county mental health agencies to provide mental health services to special education students. AB 114 requires school districts to be solely responsible for ensuring that special education students receive services such as residential placement room and board and counseling both in residential placement and in other special education programs that were previously provided by county mental health. Funding is provided to SELPAs under ERMHS. Each SELPA determines how those funds are distributed to its member districts.

The district has specific account codes to track both revenue and expenditure of these funds. Review of that budget indicates the funds are expended based on the AB 114 requirements. The

budgeted amount for residential room and board and counseling may be higher than will be expended if the trend of the past three years continues.

Recommendations

The district should:

1. Continue having the SELPA negotiate the NPS and NPA rates.
2. Monitor the NPS placements and NPA contracts, and ensure that the Business Department and special education data are aligned.
3. Ensure that each IEP for a student in an NPS has a transition plan and goals to return the student to a district program.
4. Continue to reduce the number of students in NPSs by developing programs and having the required services to meet their needs.
5. Utilize the SELPA NPA contract when the contractor is an NPA.
6. Develop specific account codes for NPS, NPA, and work agreements to more efficiently track expenditures.
7. Schedule monthly meetings of the Special Education and Business departments to ensure that all NPS, NPA, work agreement and San Diego COE expenditures are in agreement.
8. Monitor the projections under ERMHS for residential room and board and counseling. If it is determined that the district will not expend the full budgeted amount, consider using those funds to provide mental health services as required by AB 114 rather than carrying over those funds to 2015-16.

Due Process

A due process hearing procedure can be initiated when under EC 56501(a)(1), “There is a proposal to initiate or change the identification, assessment, or educational placement of the child or the provision of a free appropriate public education to the child. (2) There is a refusal to initiate or change the identification, assessment, or educational placement of the child or the provision of a free appropriate public education to the child. (3) The parent or guardian refuses to consent to an assessment of the child. (4) There is a disagreement between a parent or guardian and a local educational agency regarding the availability of a program appropriate for the child, including the question of financial responsibility, as specified in Section 300.148 of Title 34 of the Code of Federal Regulations.”

The district is able to monitor its own special education legal costs. However, staff reported that at this time the district lacks account codes that would enable tracking the legal costs paid to an attorney for parent representation or for specific settlement agreements. Therefore, the information available to FCMAT was limited.

Year	District Legal Costs	Parent Legal Costs
2011-12	\$19,163	Unknown
2012-13	\$9,532	\$4,000
2013-14	\$11,040	\$5,000

Recommendation

The district should:

1. Develop specific account codes for parent legal costs and settlement agreement costs so that both special education and business can monitor these costs and develop strategies to avoid escalating costs.

Instructional Assistants

The table below summarizes the instructional assistant support assigned to the mild/moderate program. It includes the total number of instructional assistants and the average caseload per teacher. Data is not available to determine the number of 1-to-1 instructional assistants, although staff reported that the district employs 1-to-1 instructional assistants. Although staff indicated there are re-evaluations of the need for 1-to-1 assistance, no evidence was provided that re-evaluations are completed for ongoing support, nor are plans written to decrease the 1-to-1 assistance.

Most of the instructional assistants work six hours per day; however, the data provided was inconsistent among the district office departments. Site and district staff reported that a variety of staff complete personnel requisitions. There was no evidence of procedures used to increase or decrease staffing.

Summary of Instructional Assistant Support

Program	Teacher FTEs	Caseload	District Caseload Average	Ed. Code Maximum Caseloads	Total Instructional Assistants	Average IA per Teacher
Mild Moderate Program	23	595	25.87	None	13	.565

According to Student Services Department data from 2013-14, the average caseload for teachers is 25.87, with an average of .565 FTE instructional assistants. If the district were to use the resource specialist model in lieu of its current model, according to Education Code 56362(6) (f), "At least 80 percent of the resource specialists within a local plan shall be provided with an instructional assistant." Currently, the district has 13 instructional assistants assigned to the 23 classes with an average of .565 instructional assistants per teacher. This would cause the district to be understaffed by 10, using six-hour instructional assistants.

Moderate/Severe Class Instructional Assistant Staffing

Program	No. of Classes	Number of Students	IAs	District Caseload Averages	Recommended Class Loads*	Average IAs to teachers
Moderate Severe Class	12	120	30	10 Students	8-10 Students 2 Aides	2.5

*Source: School Services of California, Inc.

The average number of instructional assistants assigned to classrooms is higher than SSC recommends by .5 per class; however, SSC's recommendation does not consider specific needs such as wheelchair or medical needs. The class sizes are the average recommended by SSC.

This level of support costs the district an additional \$288,648 per year. The 2013-14 data provided by the district cannot be accurately analyzed because it is incomplete, but it appears the instructional assistants in the transition classes are staffed at 1.25 FTE instructional assistant per class (considered moderate/severe), which is within the SSC recommendation.

Recommendations

The district should:

1. Develop and implement a coordinated position control and data tracking system to track instructional assistant positions, locations and hours of employment.
2. Consider reducing instructional assistants in the moderate/severe classes by six six-hour positions for a cost savings of \$288,648.
3. Continue to use the mild/moderate program model to maximize the special education teacher caseload capacity, which maximizes the instructional assistant personnel, for a district savings of \$481,080.
4. Continue to evaluate and appropriately staff the transition classes with instructional assistants.
5. Schedule monthly or quarterly meetings with Human Resources, Business and Special Education to ensure that staffing information aligns among all three departments.
6. Develop a consistent procedure to ensure that instructional assistant assignments are aligned with caseload. Evaluate class size monthly to determine staffing needs or changes.
7. Develop a process to determine required instructional assistant staffing hours.
8. Develop a fade plan for 1:1 support that is re-evaluated and updated periodically.

Transition from Feeder Schools

The district offers special education programs and services for disabled students in 9th to 12th grade, and transition services for students ages 18-22. The district coordinates with each feeder school to transition 8th grade students to the appropriate high school site for 9th grade.

The district lacks a consistent and clearly articulated transition process and procedures. Each high school utilizes a transition process but is inconsistent, which has led to a lack of appropriate transition IEPs.

Teachers do not have information prior to the start of school to guide them in planning and preparing for incoming 9th graders or to help them coordinate with 8th grade school staff. There is a lack of communication between the high schools and feeder schools and no clear articulation of the services and programs available at each high school. Without a clear understanding and knowledge of the available services, feeder schools are not prepared to write transition IEPs that proactively address students' needs as they enter the 9th grade.

The district's special education director attends a meeting at the feeder schools with their district director to discuss high profile situations. A district representative (a program specialist) attends approximately 60% of the transition meetings; however, high school teachers are only included when the program specialist cannot attend. Therefore, transition meetings lack an IEP team member who can speak to the specific programs and services available at a particular high school and provide input on how to best meet individual student needs as the high school IEP is developed.

Teacher representation from the receiving high school is crucial to establish a smooth and cohesive transition, particularly when high schools have varying programs and service delivery models. Depending on the type of services at each high school, the services and percentage of time in special education can vary greatly in terms of placing those services on an 8th grade student's IEP.

Lack of appropriate planning and preparation has led to staff needing to amend IEPs once students begin high school. Students are not always in the correct classes and must undergo schedule changes after the start of the school year.

Additionally, students are not always served in the least restrictive environment. Some students receive more services than they need to receive educational benefit and some receive too few services to support their needs as indicated in their IEPs. When students are required to change classes, schedules, and teachers, they lose valuable learning time. This is particularly detrimental to students who have a disability. All students should have the opportunity to make a smooth transition and have the appropriate classes, supports, and services in the least restrictive environment on the first day of school.

An established process and procedures along with early preparation and planning would enable high school teachers and staff to prepare incoming students for the following year. This would allow teachers to review 8th grade IEPs in advance and provide input to 8th grade teachers prior to transition IEPs. It would also allow high school and middle school staff to meet informally prior to an IEP meeting on student cases in which challenges with IEP team members or parents are anticipated.

It would enable high school teachers to calendar 8th grade transition IEPs and attend these meetings. Appropriate planning and preparation at 8th grade IEP meetings would enable the middle school and high school staff to adjust IEPs in advance of the changes that will occur in 9th grade. This will lessen the need to amend IEPs in 9th grade.

The challenge of appropriately placing and serving students at the start of 9th grade is exacerbated by practices and procedures at some of the feeder schools. Some students do not receive enough services and others are provided more services than they need. Staff reported that services

are often added in the 8th grade that were not previously on the IEP prior to the transition to high school. Staff also reported that services are often added at the feeder schools at parent request, with pressure on the IEP team to provide more services than the team recommends.

Student services should not be based on parent request. Providing more services than a student needs does not allow schools to fulfill their legal requirement to provide services in the least restrictive environment. It also places an undue burden on high school staff to work with parents to decrease services to an appropriate level and complete all the necessary accompanying paperwork.

The sending districts are unaware of the continuum of services provided by the receiving high school. The middle school service options, delivery of services, and placements are different from those at the high school. Without clear definitions and clarity from one another, there is a breakdown in communication between educators and also in the parents' understanding of services.

Both site and district staff reported a perception that students receive an increase of services or a more restrictive placement just prior to 9th grade. Recently, the middle school and high school have moved toward a common computerized IEP system. This will assist with transitions and receiving information in advance.

Recommendations

The district should:

1. Establish a consistent transition process and procedure to implement districtwide with all feeder schools.
2. Increase communication between high school teachers and feeder school teachers, with regular communication during the transition process.
3. Provide feeder school staff with a description of the programs and services offered at each of the high schools.
4. Include 9th grade teachers or department chairs in the 8th grade transition meetings.
5. Obtain a list of the incoming 8th grade students at the beginning of the school year to disseminate to the high schools that the students will attend for 9th grade.
6. Increase collaboration with feeder schools to more closely align middle school and high school program and service delivery.
7. Collaborate with 8th grade IEP teams to include the anticipated high school services on 8th grade transition IEPs.
8. Work with feeder schools to establish an agreement to utilize Education Code special education eligibility criteria to determine placement and any increase in special education services.
9. Through data collection and analysis, verify whether services are added to IEPs just prior to the student entering high school. If this is verified, develop guidelines with 8th grade teachers and other special education staff from the feeder schools outlining service delivery and services alignment.

Least Restrictive Environment

The district utilizes a special day class offering for students requiring unique service delivery for most of the school day. The students receiving this placement and services are typically those with autism, emotionally disturbed, medically fragile, etc. District staff reported that students in these classes integrate during the school day according to their IEPs. Other students who receive specialized academic instruction receive their services in a variety of settings and in a fluid manner.

The district does not utilize a learning center model. Instead, teachers with mild/moderate credentials implement a model that incorporates a continuum of service delivery options. The service delivery may be in a class taught 1) by a teacher with a mild to moderate special education credential, or 2) by a teacher with a subject-specific credential with special education push-in services. Students receive specialized academic instruction according to their individual needs and graduation requirements.

Recommendations

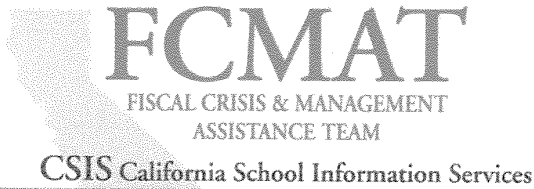
The district should:

1. Continue to utilize the mild/moderate program design to maximize the least restrictive environment and cost effectiveness.
2. Continue to re-evaluate each student's IEP and course schedule to determine least restrictive environment.

Appendices

Appendix A - Study Agreement

EJMSD PURDEPT *14FEB13 PM02:23

*Bd approved
2-11-14
C34171
Reg 702731*

**FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
February 3, 2014**

The Fiscal Crisis and Management Assistance Team (FCMAT), hereinafter referred to as the team, and the Escondido 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. Determine the district's special education encroachment on the general fund and make recommendations for greater efficiency.
2. Evaluate special education transportation services.
3. Analyze staffing ratios and class and caseload size using the statutory requirements for mandated services and statewide guidelines.
4. Analyze all staffing and caseloads for designated instruction providers, including psychologists, occupational and physical therapists, behavior specialists, and others.

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 costs of due process and mediations for the past three years.
7. Review the efficiency of para educator staffing. Analyze the procedures for identifying the need for instructional aides, and the process for monitoring the resources for allocating para educators and determining the need for continuing support from year to year.
8. Review the process used to transition students from elementary schools to the district while ensuring that the least restrictive environment is provided and determining if services will be decreased or reduced.
9. Review the process used to move a student from traditional special day classes to learning centers. Make recommendations for cost effectiveness, efficiency and improved learning opportunities for students.
10. Determine how the district can reduce deficit spending in special education and remain in compliance with the requirement to meet students' needs.

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 Lead
B. JoAnn Murphy	FCMAT Consultant
C. Matt Boyle	FCMAT Consultant
D. Trina Frazier	FCMAT Consultant
E. Keith Butler	FCMAT Consultant
F. Anne Stone	FCMAT Consultant
G. Tim Purvis	FCMAT Consultant
H. Mike Rea	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 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 \$25,000.

- 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. 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:	June or August, 2014
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: Karen Rizzi, Assistant Superintendent
Telephone: (760) 291-3251
Fax: (760) 480-3029
E-mail: krizzi@euhsd.k12.ca.us



Michael Simonson, Assistant Superintendent
Business Services
Escondido Union High School District

2/13/14

Date



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

February 3, 2014

Date