

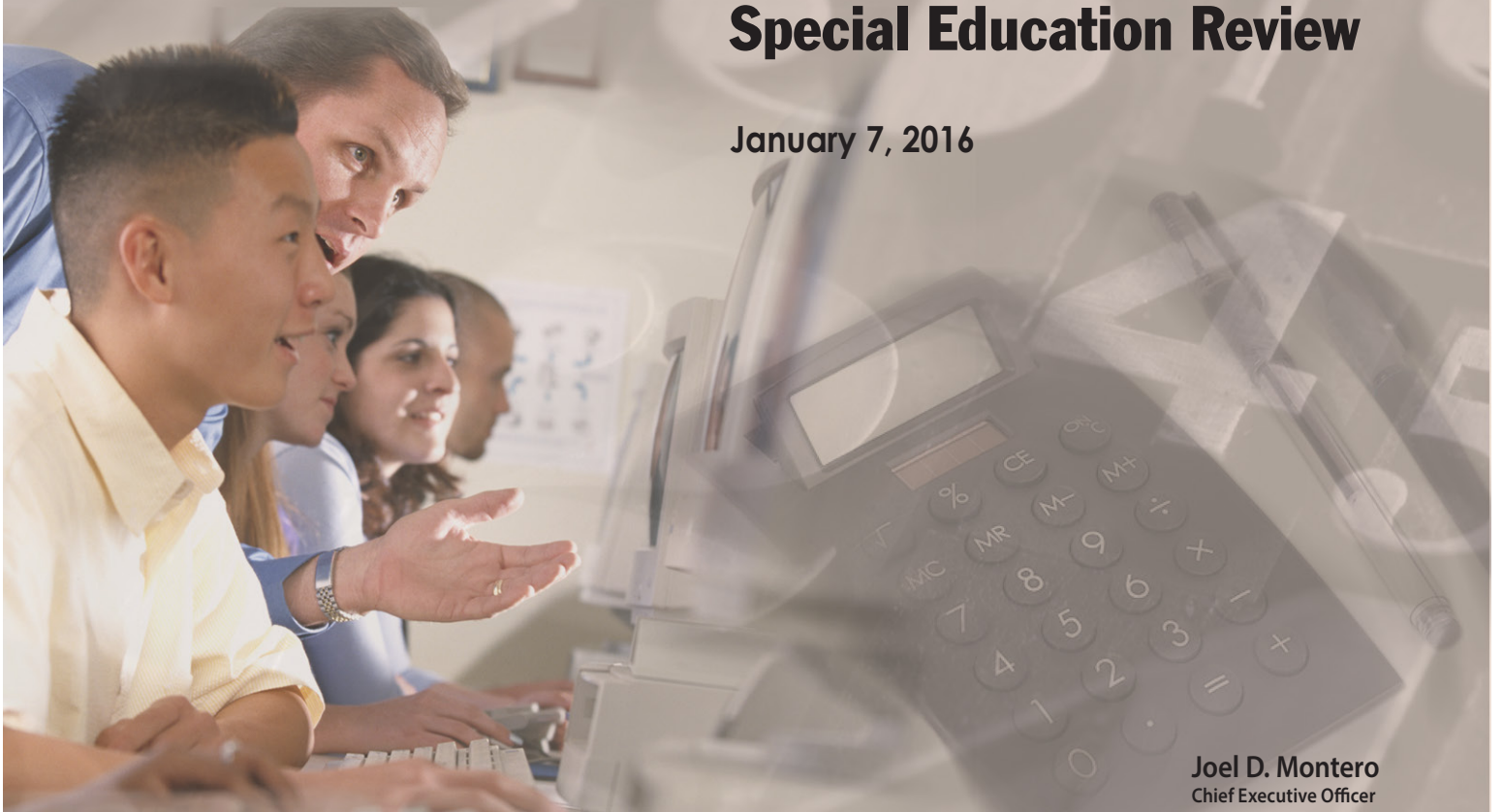


CSIS California School Information Services

Adelanto Elementary School District

Special Education Review

January 7, 2016



Joel D. Montero
Chief Executive Officer





January 7, 2016

Edwin Gomez, Ed.D., Superintendent
Adelanto Elementary School District
11824 Air Expressway
Adelanto, California 92301

Dear Superintendent Gomez:

In June 2015, the Adelanto Elementary School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for a review of the district's special education programs and services. Specifically, the agreement states that FCMAT will perform the following:

1. Analyze special education teacher staffing ratios and class and caseload sizes using the statutory requirements for mandated services and statewide guidelines.
2. Review the efficiency of special education paraeducator staffing throughout the district. Analyze the procedures used to identify the need for paraeducators and the process used to monitor the resources for allocating paraeducators, and determine the ongoing need for continued support from year to year (include 1:1 paraeducators).
3. Analyze all staffing and caseloads for related service providers: speech therapists, psychologists, occupational/physical therapists, behavior specialists, adaptive physical education teachers, credentialed nurses and others.
4. Review the use of resource allocations for nonpublic schools and agencies, mental health services and alternative programs, and make recommendations for greater efficiency.
5. Review the revenues and allocations for Medi-Cal LEA and determine areas for greater efficiencies.
6. Determine whether the district over identifies students for special education services as compared to the statewide average, and make recommendations that will reduce over identification, if needed.

FCMAT

Joel D. Montero, Chief Executive Officer

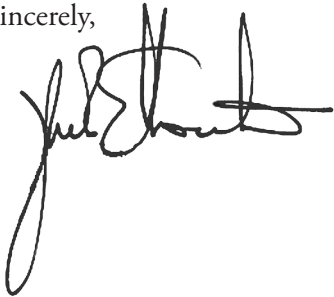
1300 17th Street - CITY CENTRE, Bakersfield, CA 93301-4533 • Telephone 661-636-4611 • Fax 661-636-4647
755 Baywood Drive, 2nd Floor, Petaluma, CA 94954 • Telephone: 707-775-2850 • Fax: 707-636-4647 • www.fcmat.org
Administrative Agent: Christine L. Frazier - Office of Kern County Superintendent of Schools

7. Evaluate transportation services for special education students to ensure efficiency and identify potential cost savings.
8. Review the special education transportation delivery system, including but not limited to the role of the IEP, routing, scheduling, operations, and staffing.
9. Analyze the use of contracted LVN services.

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

We appreciate the opportunity to serve you and we extend thanks to all the staff of the Adelanto Elementary School District for their cooperation and assistance during fieldwork.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joel D. Montero', with a large, stylized initial 'J'.

Joel D. Montero

Chief Executive Officer

Table of Contents

About FCMAT	iii
Introduction	1
Executive Summary	3
Findings and Recommendations.....	7
Staffing and Caseloads	7
Instructional Assistants.....	11
Related Service Provider Caseloads	17
Licensed Vocational Nurse.....	23
Nonpublic School or Agency, Mental Health and Alternative Programs	25
Medi-Cal LEA	29
Identification	31
Transportation	35
Appendix.....	45

About FCMAT

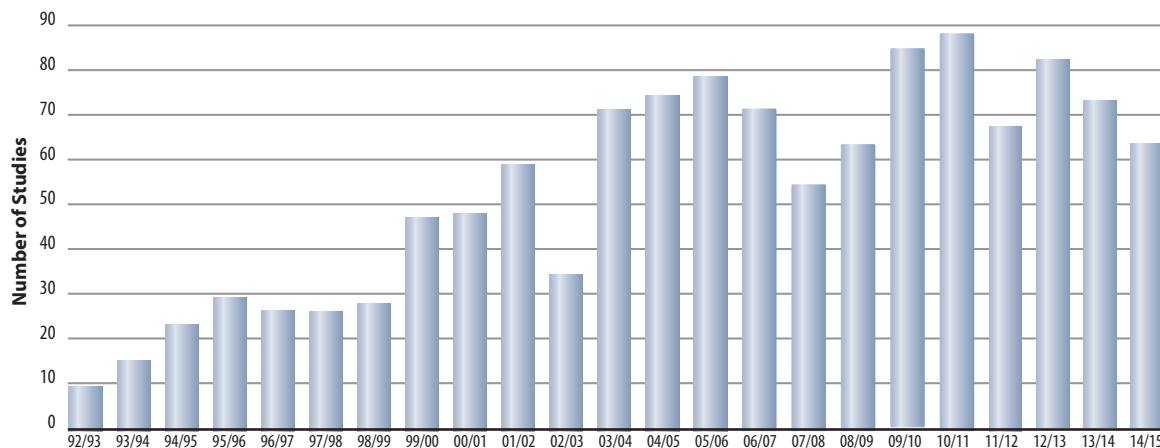
FCMAT's primary mission is to assist California's local K-14 educational agencies to identify, prevent, and resolve financial, human resources and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related 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, support the training and development of chief business officials and help to create efficient organizational operations. FCMAT's data management services are used to help local educational agencies (LEAs) meet state reporting responsibilities, improve data quality, and inform instructional program decisions.

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 LEA 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.

FCMAT has continued to make adjustments in the types of support provided based on the changing dynamics of K-14 LEAs and the implementation of major educational reforms.

Studies by Fiscal Year



FCMAT also develops and provides numerous publications, software tools, workshops and professional development opportunities to help LEAs operate more effectively and fulfill their fiscal oversight and data management responsibilities. The California School Information Services (CSIS) division 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 (AB) 1200 in 1992 to assist LEAs to meet and sustain their financial obligations. AB 107 in 1997 charged FCMAT with responsibility for CSIS and its statewide data management work. AB 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. AB 2756 (2004) provides specific responsibilities to FCMAT with regard to districts that have received emergency state loans.

In January 2006, Senate Bill 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

The Adelanto Elementary School District encompasses approximately 335 square miles in the high desert of San Bernardino County. The district also includes the city of Adelanto, parts of the city of Victorville, and unincorporated parts of San Bernardino County. Like other high desert communities, Adelanto Elementary experienced steady growth in the past, and although growth slowed during the Great Recession, it is now resuming. The potential for significant student enrollment growth is a large factor for the district. The district has 13 schools, including eight K-6 schools, one K-7 school, two K-8 schools and two middle schools serving students in grades 7 and 8. The district serves approximately 8,410 students, 1,446 of whom are identified as requiring special education services.

The district is located in the Desert/Mountain Special Education Local Planning Area (SELPA), which is composed of 21 local educational agencies and the San Bernardino County Superintendent of Schools. The SELPA covers a 20,627 square mile region in San Bernardino County that extends from the mountains to the Arizona border. The SELPA is a public agency and part of a joint powers authority (JPA), separate from the member public agencies, known as the California Association of Health and Education Linked Professions (CAHELP JPA). This SELPA JPA provides the mental health services to students in accordance with Assembly Bill 114.

The district's student population is 10.8% white, 59.5% Hispanic/Latino, 22.9% black/African American and 6.8% other. 87.6% of the district's students receive free or reduced-price meals.

Over the past four years, the district has had high turnover of administrators. The average tenure of school administrators is less than three years, and at the district office the superintendent, chief academic officer, chief business officer, chief human resources officer, director of finance, and coordinators of curriculum came to the district within the past two and a half years.

Study and Report Guidelines

FCMAT visited the district on October 20-22, 2015 to conduct interviews, collect data and review documents. This report is the result of those activities and is divided into the following sections:

- Executive Summary
- Staffing and Caseloads
- Instructional Assistants
- Related Service Provider Caseloads
- Licensed Vocational Nurse
- Nonpublic School or Agency, Mental Health and Alternative Programs
- Medi-Cal LEA
- Identification
- Transportation
- Appendix

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
Sacramento, CA

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

Phillip Williams*
Associate Superintendent
Placer County Office of Education
Auburn, CA

Don Dennison
FCMAT Consultant
Arroyo Grande, CA

Mike Rea*
Executive Director
West County Transportation Agency
Santa Rosa, CA

John Lotze
FCMAT Technical Writer
Bakersfield, CA

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

*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

FCMAT was asked to review and analyze nine areas related to special education, which are included in the study agreement for this report. During fieldwork, FCMAT found one additional area of significant need and recommends additional analysis:

- The district should review the organizational structure of the district office, specifically in the Special Education Department.

Staffing and Caseloads

FCMAT analyzed all special education certificated positions using the requirements for mandated services and statewide guidelines. If resource specialists program (RSP) caseloads were raised to the maximum allowed by the Education Code (EC 56362(c)), the district could reduce full-time equivalent (FTE) teaching positions from 23.5 to 19.7 for a projected approximate annual savings of \$336,452 including statutory and health/welfare benefits.

- The district should assess its staffing ratios for special day classes (SDCs) for students with mild to moderate disabilities and increase teaching position FTEs at its K-6 schools and middle schools. This increase would cost approximately \$230,204 annually.
- The district should assess its staffing ratios for SDCs for students with moderate to severe disabilities at K-6 and K-7 schools and increase teaching positions by 0.4 FTE teaching positions.
- The district should decrease 1.7 FTE teaching positions at its K-8 schools. This decrease would save approximately \$115,102 annually.
- The district should assess staffing ratios and classroom supports in its SDCs for students with severe to profound disabilities and increase staffing and supports as needed to meet students' needs. Increasing the teacher FTE to meet the industry standard would cost the district approximately \$17,708 annually.

Instructional Assistants

District documents indicate that it has 125 1-to-1 paraprofessional positions, which range from two to six hours per day. The Desert/Mountain SELPA Policy/Handbook provided by the district states that the recommendation for a 1-to-1 paraprofessional is a significant program decision and should only be made after a comprehensive discussion of other options and clear documentation of why those options are not appropriate. The district does not regularly review or analyze staffing ratios in its various settings and schools.

Related Service Provider Caseloads

The district's speech caseload average of 57.45 students per FTE exceeds the state mandate of 55 students per FTE. Assuming that a minimum of 0.80 FTE of school psychologist staffing is assigned to other duties, the district is understaffed by 0.53 FTE school psychologists. At the average salary for a school psychologist provided by the district, this represents a cost of \$65,593 annually. The industry standard for an occupational therapist's caseload is 45-55 students. The district's average occupational therapist caseload is 74 students per 1.0 FTE occupational therapist position; however, the district compensates for this by using a full-time certified occupational therapy assistant. The district's caseload for adaptive physical education exceeds industry stan-

dards by 12 students. Based on industry standards, the district is understaffed by 1.4 FTE school nurse positions.

Nonpublic School or Agency, Mental Health, and Alternative Programs

Most of the district's nonpublic agency (NPA) costs are for LVN services, which cost \$235,827.21 annually. Based on this information, the district has increased nonpublic school (NPS) and NPA costs to \$284,286.89 over the last three years. The district contracts with the San Bernardino County Office of Education and other LEAs for services to approximately 230 of its students, at a total annual cost of approximately \$3,297,425.57, or \$14,336.63 per student.

Medi-Cal LEA

The district does not make full use of all options for LEA Medi-Cal billing. Based on an analysis of information provided for this review, over the last four years the district has averaged \$239,250 in net LEA Medi-Cal income. A conservative estimate indicates that the district should be able to increase annual LEA billing net income to \$400,000-\$425,000, an annual increase of \$160,750-\$185,750.

Identification

The district has identified 17.9% of its students as eligible for special education services. This is significantly higher than the statewide average of 10.1%. The estimated cost of this over identification is \$4.9 million for the 2015-16 school year. District staff indicated that the overidentification is due to a lack of Response to Intervention (RtI) or multitiered system of supports (MTSS).

Transportation

The district does not track and charge all vehicle maintenance repairs, service and fuel to the department assigned the vehicle. Not charging these items to the appropriate department results in the transportation program absorbing these nonbus-related expenses, inflating its costs.

District documents dated June 2015 identified 282 students with IEPs that require transportation as a related service. However, a manual count by FCMAT found that approximately 314 students receive transportation as a related service and use district special education routes. FCMAT's review indicated that 21.7% of the district's special education students receive transportation as a necessary related service, which is more than twice the average of districts recently assessed by FCMAT.

The district's transportation program operates 20 special education bus routes, 12 regular education home-to-school bus routes, and one overflow bus route, for a total of 33 regularly scheduled routes. The district should consider separating the transportation program from the maintenance, operations and transportation (MOT) department and making transportation its own department within the Business Services Division.

Licensed Vocational Nurse

The district contracts with a private agency for licensed vocational nurse (LVN) services. During the 2014-15 school year, the district developed a job description with the intent of hiring its own LVNs. The district appears to be increasing its reliance on LVN services without considering an increase in school nurse services. The district's average annual cost for a school nurse employee is \$86,452. The cost of 10 LVNs equals the cost of 5.45 FTE school nurse positions. Continued reliance on LVN services rather than school nurse services may weaken the district's ability to meet its responsibilities for students' health.

Findings and Recommendations

Staffing and Caseloads

FCMAT analyzed all special education certificated positions using the requirements for mandated services and statewide guidelines. The district provided FCMAT with various staffing reports by program, location, staffing, and type of program. The district provides resource specialist programs (RSPs) at all school sites, and a specialized academic instruction (SAI) program at both middle schools. The SAI program at Mesa Linda Middle School has three classes serving students with mild disabilities and three classes serving students with mild to moderate disabilities. The district's eight K-6 elementary schools serve students in RSP, students with mild to moderate disabilities, and those with moderate to severe disabilities. The district's K-7 elementary school serves students in RSP, students with mild to moderate disabilities, students with moderate to severe disabilities, and students with severe to profound disabilities. The district's two K-8 elementary schools serve students in RSP, students with mild to moderate disabilities, and students with moderate to severe disabilities. The class for students with moderate to severe disabilities supports students with emotional disturbances in the Steps to Success Program.

FCMAT found that there is little communication between Business Services, Human Resources and Special Education in the development of staffing allocations, position control and budget development.

Resource Specialist Programs

The districtwide total RSP caseload is 551 students, and the district has a total of 11.5 FTE resource specialist teachers at all elementary schools. These RSP teachers maintain average caseloads of 20.3 students, which is below the statutory maximum caseload of 28 (EC 56362(c)). The district has 1.5 FTE resource specialist teachers at the K-7 school; these RSP teachers have a caseload of 27.3. There are 4.5 FTE resource specialist teachers at the K-8 schools, with a caseload of 32.4 students each, which is above the statutory maximum. The district has 6.0 FTE resource specialist teachers at its middle schools, with a caseload 21.7 students each. If the district had the maximum statutory caseload for all RSP teachers, it could reduce its teacher FTEs from 23.5 to 19.7 for a projected average annual savings of \$336,452.

The chart below shows RSP caseloads by grade level, the statutory maximum, and potential cost savings or costs of maximizing caseloads.

Level	Total Teacher FTE	Total Students	Total Ratio	Education Code Maximum Ratio (FTE to Student Caseload)	Potential Reduction/Increase	Potential (Savings)/Cost
K-6	11.5	234	1:20.3	1:28	-3.1	(\$274,474)
K-7	1.5	41	1:27.3	1:28	0	0
K-8	4.5	146	1:32.4	1:28	+0.7	\$61,978
7-8	6.0	130	1:21.7	1:28	-1.4	(\$123,956)
Totals	23.5	551	1:23.4	1:28	-3.8	(\$336,452)

Source: District data, Education Code 56362(c)

Special Day Classes for Students with Mild to Moderate Disabilities

The district operates special day classes (SDCs) for students with mild to moderate disabilities from kindergarten through grade eight with a total of 17 teachers.

- At its eight K-six elementary schools, the district operates a total of four K-3 SDCs, one grades 3-4 SDC, four grades 4-6 SDCs, and one grades 5-6 SDC.
- At its one K-7 elementary school, the district operates one K-7 SDC. At its two K-8 schools, the district operates one K-3 SDC, one grades 5-7 SDC, and one grade eight SDC.
- At its two middle schools, the district operates one grades 7-8 SDC and two grade eight SDCs.

The Education Code does not indicate maximum class sizes for SDCs for students with mild to moderate disabilities; however, the industry standard is one teacher for every 12-15 students. The district's average class size for these classes is 18.4 students per teacher in its K-6 elementary schools, 17 students per teacher in its K-7 elementary schools, and 19.6 students per teacher in its grades 7-8 middle schools. All these ratios are higher than the industry standard.

The district's average class size for students with mild to moderate disabilities at its K-8 schools is 11.3 students per teacher, which is lower than the industry standard.

Districtwide, the average SDC caseload ratio is 17.3 students per teacher, which is higher than the industry standard.

The district needs to assess SDC ratios and consider increasing teacher staffing across its K-6 elementary schools and the grades 7-8 middle schools. This increase would cost approximately \$230,204.

For each school grade level range, the following table shows the district's SDC caseloads and staffing ratios for students with mild to moderate disabilities, potential increases or decreases in staffing to match industry standards, and the potential cost increase or savings for each.

Level	Total Teacher FTE	Total Students	Total Ratio	Industry Standard I:12-15	Potential Reduction/Increase	Potential (Savings)/Cost
K-6	10	184	1:18.4	1:12-15	+2.3	\$203,642
K-7	1.0	17	1:17	1:12-15	+0.1	\$8,854
K-8	3.0	34	1:11.3	1:12-15	-.7	(\$61,978)
7-8	3.0	59	1:19.7	1:12-15	+0.9	\$79,686
Totals	17	294	1:17.3	1:12:15	+2.6	\$230,204

Source: District data, Industry standards

Special Day Classes for Students with Moderate to Severe Disabilities

The district operates special day classes for students with moderate to severe disabilities from kindergarten through grade eight with a total of six teachers. One K-6 moderate to severe SDC is located on a K-6 elementary site and one K-7 moderate to severe SDC is located on a K-7 elementary site. On the two K-8 elementary sites, the district operates four moderate to severe SDCs. Two of the four were developed to support the transition of students with emotional disturbance from county operated programs and are divided into a K-6 SDC and a 7-8 SDC. These classes are staffed with additional paraprofessionals in the classroom and on the bus. The district does not operate moderate to severe classes on the 7-8 middle school sites.

The Education Code does not indicate maximum caseloads for SDCs for students with moderate to severe disabilities; however, the industry standard is 10-12 students per teacher.

The district's average class size for SDCs for students with moderate to severe disabilities at its K-6 and K-7 elementary schools is 14 students per teacher, which is higher than the industry standard. At the district's K-8 elementary schools, the average class size is seven students per teacher, which is lower than the industry standard. Districtwide, the average class size of SDCs for students with moderate to severe disabilities is 9.3 students per teacher, which is lower than the industry standard.

The district needs to assess staffing and caseloads in its SDCs for students with moderate to severe disabilities, consider increasing teacher positions by 0.4 FTE in the K-6 and K-7 SDCs, and consider decreasing teacher positions by 1.7 FTE across the K-8 schools. The net decrease would save approximately \$115,102 annually.

Level	Total Teacher FTE	Total Students	Total Ratio	Industry Standard I:10-12	Potential Reduction/ Increase	Potential (Savings)/ Cost
K-6	1.0	14	1:14	1:10-12	+0.2	\$17,708
K-7	1.0	14	1:14	1:10-12	+0.2	\$17,708
K-8	4.0	28	1:7	1:10-12	-1.7	(\$150,518)
Totals	6.0	56	1:9.3	1:10-12	-1.3	(\$115,102)

Source: District data and Industry Standard

Special Day Class for Students with Severe to Profound Disabilities

The district operates one SDC for students in grades K-7 with severe to profound disabilities.

The Education Code does not indicate maximum caseloads for this type of SDC; however, the industry standard is 8-10 students per teacher. The district's SDC for students with severe to profound disabilities has 12 students, which is higher than the industry standard. The district needs to assess this SDC ratio and classroom supports and consider increasing staffing to meet students' needs. Increasing the teacher FTE to meet the industry standard would cost the district approximately \$17,708 annually, as indicated in the table below.

Level	Total Teacher FTE	Total Students	Total Ratio	Industry Standard 1:8-10	Potential Reduction/ Increase	Potential (Savings)/Cost
K-7	1.0	12	1:12	1:8-10	+0.2	\$17,708

Source: District data and Industry Standard

Recommendations

The district should:

1. Conduct regular joint meetings of the Business Services, Human Resources and Special Education departments on staffing, position control, and budget.
2. Develop an automated system to monitor and track special education staffing and caseloads for certificated and classified staff.
3. Develop program descriptions and caseload guidelines and ensure they are communicated districtwide.
4. Consider reducing RSP teaching positions by 3.8 FTE for a savings of \$336,452 annually.
5. Consider adding SDCs for students with mild to moderate disabilities, or serving these students in the RSP setting, to bring the average SDC caseload down to the industry standard.
6. Conduct a comprehensive special education program staffing review annually; ensure that it includes all programs and sites.
7. Consider reducing teaching positions in SDCs for students with moderate to severe disabilities by 1.3 FTE for an annual savings of \$115,102.
8. Evaluate staffing in the SDCs for students with severe to profound disabilities and reducing 1-to-1 aide support in favor of more environmental support.

Instructional Assistants

FCMAT reviewed and analyzed the district's 2015-16 1-to-1 paraprofessional list and special education services 2015-16 staffing list.

Paraprofessionals

District documents indicate it has 125 paraprofessional positions. These positions range from two to six hours per day and serve students in SDCs and RSPs, those who are included in general education but need 1-to-1 assistance, and those who require medical supports. The average annual cost of a paraprofessional, based on a six-hour day, is \$24,908.

In interviews, staff indicated that specialized settings are understaffed, which often results in parents requesting additional staffing in the form of a 1-to-1 paraprofessional. The district provided documents that show a comprehensive process for determining the need for special circumstance instructional assistants (SCIA), but staff reported it is used inconsistently and almost always results in a 1-to-1 paraprofessional assigned to the student. The district provided documentation stating that all RSP classes and classes for students with mild to moderate disabilities are staffed with one six-hour or two three-hour paraprofessionals, and all classes for students with moderate to severe disabilities are staffed with two to three paraprofessionals. The district did not provide any information or procedure for how the levels of classroom support are determined or how additional or environmental supports are determined before determining the need for more individualized support in the form of a 1-to-1 paraprofessional.

FCMAT completed an analysis focusing on the allocation of paraprofessionals throughout the district, based on Education Code and industry standards. Education Code 56362 (6) (f) states, "At least 80% of the resource specialists within a local plan shall be provided with an instructional assistant."

The district has a total of 12.5 FTE paraprofessional assigned to 11.5 FTE K-6 elementary RSP teachers; 1.5 FTE paraprofessionals assigned to 1.5 FTE K-7 elementary school RSP teachers; 6.0 FTE assigned to 4.5 FTE K-8 elementary school RSP teachers; and 5.0 FTE assigned to 6.0 FTE grades 7-8 middle school RSP teachers.

Based on Education Code 56362 (6) (f) the district is appropriately staffed at the middle school level but is overstaffed at all other levels. Reducing RSP paraprofessional staffing by 3.3 FTE across the K-6 elementary schools, by 0.3 FTE at the K-7 elementary school, and by 2.4 FTE across the K-8 elementary schools would bring staffing to an appropriate level and save the district \$154,429 annually.

Level	Total RSP FTE	Total RSP Paraprofessional FTE	District Paraprofessional Assignment %	Education Code Required Paraprofessional Assignment %	Potential FTE Reduction/ Increase	Potential (Savings)/ Cost
K-6	11.5	12.5	109%	80%	-3.3	(\$82,196)
K-7	1.5	1.5	100%	80%	-0.3	(\$7,472)
K-8	4.5	6.0	133%	80%	-2.4	(\$59,779)
7-8	6.0	5.0	83%	80%	-0.2	(\$4,982)
Totals	23.5	25	106%	80%	-6.2	(\$154,430)

Source: District data and Education Code 56362 (6) (f)

Special Day Classes for Students with Mild to Moderate Disabilities

The Education Code does not indicate the percentage of SDCs that should be assigned instructional assistants; however, the industry standard for SDCs for elementary through high school students with mild to moderate disabilities is one six-hour paraprofessional for 12-15 students (for a total of one adult to seven children). District-provided information shows a slight understaffing of instructional assistants across the K-6 elementary schools and K-7 elementary school, and overstaffing at the K-8 elementary schools and the middle schools. If the district were to evaluate, adjust and reduce these instructional assistant assignments in accord with its collective bargaining agreement, it could potentially save approximately \$4,152 annually.

Mild Moderate	Total SDC FTE	Program Paraprofessional in Hours	Industry Standard in Hours	Potential Reduction/ Increase	Potential (Savings)/ Cost
K-6	10	54	60	+4 Hours	\$16,605
K-7	1.0	6	6	+4 Hours	\$16,605
K-8	3.0	21	18	-3 Hours	(\$12,454)
7-8	3.0	24	18	-6 Hours	(\$24,908)
Totals	17	105	102	-1 hours	(\$4,152)

Source: District data and Industry Standard

Special Day Classes for Students with Moderate to Severe Disabilities

The Education Code does not indicate the percentage of SDCs for students with moderate to severe disabilities that should be assigned a paraprofessional; however, the industry standard for these classes is two six-hour paraprofessional for 10-12 students (for a total of one adult to four children) for elementary through high school students. District-provided information shows a slight overstaffing across all elementary schools. Reducing staffing by 0.5 FTE at the K-6 schools, by 1.0 FTE at the K-7 elementary school, and by 6.0 FTE at the K-8 elementary schools would save the district approximately \$77,214 per year.

Moderate to Severe	Total SDC FTE	Total Students	Total Ratio	Total SDC Paraprofessional Hours	Industry Standard in Hours	Potential Reduction/ Increase	Potential (Savings)/ Cost
K-6	1.0	14	1:14	15	12	-1.8 Hours	(\$7,472)
K-7	1.0	14	1:14	18	12	-4.8 Hours	(\$19,926)
K-8	4.0	28	1:7	60	48	-12 Hours	(\$49,816)
Totals	6.0	56	1:9.3	93	72	-18.6 Hours	(\$77,214)

Source: District data, Industry Standard

Special Day Class for Students with Severe to Profound Disabilities

The Education Code does not indicate the percentage of SDCs that should have an instructional assistant; however, the industry standard for SDCs for students in elementary through high school with severe to profound disabilities is two six-hour paraprofessionals for 8-10 students (for

a total of one adult to three children). District-provided information shows a slight overstaffing at the K-7 elementary school. Reducing instructional assistant staffing by 1.0 FTE at the K-7 school would save the district approximately \$24,908 annually.

Severe to Profound	Total SDC FTE	Total Students	Total Ratio	Total SDC Paraprofessional Hours	Industry Standard	Potential Reduction/ Increase	Potential (Savings)/ Cost
K-7	1.0	12	1:12	18	12 Hours	-6 Hours	(\$24,908)

Source: District data, Industry Standard

1-to-1 Paraprofessionals

The Desert/Mountain SELPA Policy/Handbook states that the recommendation for a 1-to-1 paraprofessional (also known as a special circumstances instructional aide) is a significant program decision that should be made only after a comprehensive discussion of other options and clear documentation regarding why those options are not appropriate. Some students may need an SCIA temporarily to receive a free appropriate public education (FAPE); for the other students, the assignment of an SCIA may be unnecessary and inappropriately restrictive. The assignment of an SCIA should always be for a limited time with specific goals, monitoring strategies, fading strategies, and review dates. The Desert/Mountain SELPA document also states that all aspects of the student's program must be considered, including using natural supports and existing staff with the intent of maximizing student independence in the least restrictive environment. Whenever possible, additional assistance is assigned to a school environment, class, or case manager.

The district does not regularly review or analyze special education staffing ratios across different settings and school sites. Interviews with employees indicated a reactive approach to staffing specialized programs and classrooms rather than a systematic and proactive method for this staffing. The percentages in the following paragraphs bear this out. This reactive approach to staffing creates unnecessary staffing and more restrictive settings for students.

District-provided information indicates that the percentage of paraprofessional support hours assigned to specific students is 44% at the K-6 elementary schools, 51% at the K-7 elementary school, 40% at the K-8 elementary schools, and 18% at the grades 7-8 middle schools. Districtwide, 41 of all paraprofessional support hours are assigned to specific students.

In addition to the high 1-to-1 paraprofessional staffing rates across the district, in multiple interviews district staff indicated that 1-to-1 paraprofessional assignments are not assessed or reviewed after the initial assignment. The only planned reassessment for 1-to-1 paraprofessionals is at the student's triennial review. This practice ensures the student and staff become attached or enabled by the additional support.

The Desert/Mountain SELPA Policy/Handbook states that the IEP team shall address the means of reviewing and evaluating the necessity of the SCIA, and should periodically review the effectiveness and continued need for the additional support. The district's 1-to-1 staffing rates indicate a lack of planning, programmatic review, and cross-department collaboration.

The high number of 1-to-1 paraprofessional assignments also creates potential legal challenges since the district must initiate an IEP meeting every time it wants to reduce the related service on the IEP (EC 56363).

It would benefit the district to ensure that its chief of personnel, chief business officer and director of special education meet monthly to review paraprofessional assignments and 1-to-1 assignments. These meetings should focus on analyzing ongoing permanent program staffing based on student enrollment and the review of timelines for gradually reducing (known as fading) 1-to-1 paraprofessionals (the Desert/Mountain SELPA policies and procedures are available at <http://dmselpa.org/pnp-dms.php>).

The following table shows the district's total and 1-to-1 paraprofessional hours, by grade levels.

RSP to Severe	Total Program Paraprofessional in Hours	Total 1:1 Paraprofessional Hours	Total Paraprofessional Hours	% of Total Paraprofessional Hours 1:1
K-6	144	114	258	44%
K-7	51	54	105	51%
K-8	117	78	195	40%
7-8	54	12	66	18%
Totals	366	258	624	41

Source: District data

District-provided data indicates paraprofessional overstaffing in RSPs, SDCs for students with mild to moderate disabilities, SDCs for students with moderate to severe disabilities, and SDCs for students with severe to profound disabilities. The same data shows 41 of the paraprofessional support hours are assigned to specific students. The district should implement a plan to reduce paraprofessional support staffing to industry standard levels districtwide. Every IEP indicating additional 1-to-1 paraprofessional support should be critically evaluated using the Desert Mountain Special Circumstance Instructional Assistance process. The district has a culture of reacting with more restrictive placements and additional staffing instead of proactively assessing current need and responding with appropriate training and targeted short term supports. Even though this is not following industry standard, the district may consider the following during the transition.

The district would still recognize a \$572,884 annual savings if it staffed all SDCs for students with mild to moderate disabilities with 2.0 FTE paraprofessionals (six hours program and 6 hours environmental support), all SDCs for students with moderate to severe disabilities with 3.0 FTE paraprofessionals (12 hours program and six hours environmental), and all SDCs for students with profound to severe disabilities with 4.0 FTE paraprofessionals (18 hours program and six environmental). This savings, combined with the \$154,429 savings from staffing 80% of RSPs with paraprofessional support in accordance with the Education Code could result in a total annual savings of approximately \$727,313.

In interviews, staff indicated that many requests for 1-to-1 assistance came from staff and parents concerned about student behavior. It would benefit the district to provide comprehensive professional development focusing on universal positive behavioral supports. One system for accomplishing this is provided in the 2015 report of California's Statewide Task Force on Special Education, "Reforming Education to Serve ALL Students," which is available at <http://www.smcoe.org/about-smcoe/statewide-special-education-task-force/>

The report states that a multitier system of supports (MTSS) is a proven vehicle for providing appropriate degrees of social-emotional learning, all of which are geared toward the specific needs of the child, with universal positive behavioral supports (such as positive behavior intervention and supports (PBIS), restorative practices, and other programs identified through the

Collaboration for Academic, Social and Emotional Learning (CASEL). It would benefit the district to consider adding schoolwide supports and services to the professional development plan.

At schools where the SCIA process is followed, there is no district-level special education representation at IEP meetings. School principals are the administrative designee and are responsible for offering and agreeing to the additional paraprofessional support. School principals are not appropriately trained, nor do they have the necessary experience in IEPs to navigate the legal compliance and financial implications associated with such an offer. FCMAT interviewed nine of the district's 13 principals and found that the average tenure of principals interviewed was 2.6 years in their current position. One principal had eight years of experience; excluding that position, the remaining seven principals had an average tenure of 1.9 years. In light of this information, it would benefit the district to ensure that its director of special education is present to facilitate any IEP meeting at which any additional support is requested and evaluated. If the district continues to have school principals administer IEPs where additional supports and services are discussed and offered, principals will need to receive extensive training in facilitating and administering legally compliant IEPs.

Recommendations

The district should:

1. Ensure the special education director attends all IEPs involving SCIA requests or assessments, and develop a professional development plan focused on writing and implementing effective and legally defensible IEPs.
2. Ensure the special education director meets regularly with the Human Resources and Business departments to review position control, salaries and benefits.
3. Evaluate all 1-to-1 paraprofessional assignments to determine when and why the additional staffing was assigned. Create a database to monitor and manage assignments and fading timelines, and report to the Business Department and Human Resources during regularly scheduled meetings.
4. Train all staff (principals, teachers, and designated instructional service (DIS) providers) in the process of determining the need for SCIA's.
5. Train all site principals in writing legally compliant and defensible IEPs.
6. Train all staff to strictly adhere to the process for determining the need for SCIA's developed by the Desert/Mountain SELPA.
7. When an IEP team determines the need for a 1-to-1 paraprofessional, ensure that the IEP clearly defines goals, monitoring plan, and a fading plan.
8. Develop a districtwide policy to implement an MTSS, and provide professional development for all staff on school wide behavioral supports such as Positive Behavior Interventions and Supports (PBIS).

Related Service Provider Caseloads

Speech and Language Pathologist

Like most other school districts, Adelanto Elementary has had difficulty hiring fully credentialed speech and language pathologists (SLPs). The district has addressed this need by hiring speech and language pathology interns who are in the process of completing their college requirements for the SLP license and credential. The district has 11 full-time SLP intern positions (excluding one vacancy). As interns, these employees require supervision from a licensed and credentialed SLP. The district employs one full-time and one part-time licensed and credentialed SLP to provide intern supervision, but the supervising SLPs do not carry a student caseload and are not calculated in the average caseload table below. The interns have five years to complete their requirements to become credentialed and licensed SLPs, and if this requirement is not completed, they must discontinue their internship. This intern time frame is subject to revision at any time at the state level and was recently reduced from seven years to five. Hiring SLP interns instead of speech and language pathologists reduces costs. The full-time supervising SLP is making approximately \$34,000 more than the average cost of an SLP intern based on data provided by the district. The Education Codes sets the maximum speech caseload at 55 students for the K-12 population and 40 students at the preschool level. Adelanto Elementary K-12 SLPs carry an average caseload of 57.45 students. An additional .50 FTE speech pathologist would be required to bring the caseload average to 55.

District speech caseloads are negatively affected by the identification of mild to moderate articulation disorder students who are served with active IEPs. Many districts in the state are developing Response to Intervention procedures to serve students with mild articulation disorder rather than relying solely on special education identification and service.

The county office provides preschool special education services to the district including preschool speech assessment and service. Preschool special education assessment represents the first doorway into special education services. Fifty-nine students receive speech and language services in the county-operated preschool program, and 35 have a primary disability of speech and language impairment. Staff interviewed indicated there is a potential advantage to the district taking responsibility for preschool speech assessment and service. This would place the district at the critical point of early special education identification for its youngest population.

Staff interviews found that speech pathologist time is negatively affected by the centralized IEP scheduling performed by the district office.

Speech and Language Pathologist Caseload Comparison

Provider	District Total FTE-to-Caseload Ratio	District Average Caseload Ratio	Ed Code Maximum FTE-to-Caseload Ratio
Speech-Language Pathologist-Ratio K-8 (See narrative Re: Interns)	11.0-to-632	57.45	1-to-55

Source: Education Code 56441.7 and 56363.3 and District Data

Speech caseload averages exceed state mandates of 55 students per FTE. They reflect an average caseload of 57.45 per FTE.

Recommendations

The district should:

1. Develop speech and language practices utilizing the principles of Response to Intervention that would allow students with mild articulation disorders to be served in the least restrictive environment before they are considered for special education services.
2. Consider the efficacy of district provided speech and language assessment and services to preschool age students to have more local control over identification for services.
3. Consider the necessity of adding a .50 FTE speech pathology position to comply with the district certificated contract language and state guidelines for speech pathology caseloads.
4. Consider reducing its reliance on SLP interns, allowing the supervising full- and part-time credential SLPs to be reassigned to direct service.

School Psychologist

The district employs six FTE school psychologists. The standard role and responsibilities for school psychologists in the district generally complies with state and professional standards. However, one school psychologist supports special education services by spending approximately 80 percent of her time performing management duties that are typically assigned to a program specialist or a coordinator of special education. A second school psychologist is assigned to the program for the emotionally disturbed daily for behavior support. Therefore, instead of 6.0 FTE serving students, the district has at most 5.2 FTE actively providing school psychologist duties, causing it to be understaffed for school psychologists. The majority of school psychologist time is spent in initial assessment of students for special education eligibility, attempting to meet state and federal guidelines for timelines on initial assessment and triennial assessment and participation in IEP meetings. The absence of a viable districtwide Response to Intervention program increases the rate of student referral to special education. Staff interviews indicated that the process of scheduling all IEPs through the district office negatively impacts the efficient use of school psychologist time.

Assuming that a minimum of .80 FTE of school psychologist assignment is redirected to other duties, the district is understaffed in school psychology services by .53 FTE. At the average salary of a school psychologist provided by the district, this represents a cost of \$65,593 annually. This cost can be avoided by returning all school psychology staff to their regular duties.

School Psychologist Caseload Comparison

Program	No. of FTE	Caseload	Industry Standards Data for Students per FTE	District Caseload Average
Psychologist	5.2	8,410	1-to-1466	1-to-1617

Source: Industry standards and district data

Recommendations

The district should:

1. Develop an effective Response to Intervention program across all levels of instruction in the district.
2. Consider adding designated administrative support in the Special Education Department that would allow existing school psychology staff to return to their assigned duties.
3. Consider the behavioral and therapeutic counseling needs of the program for the emotionally disturbed to allow the existing school psychology staff to return to their primary duties.

Occupational Therapists

In the last two school years, the district made the decision to hire its own occupational therapists (OTs) and a certified occupational therapist assistant (COTAs) rather than rely on the SELPA to provide that service. It now has two full-time OTs hired by the district and a full-time COTA. Based on interviews with staff, the district lacks a standard procedure for screening prior to referral for OT services. Most school site staff have a minimal understanding of the purpose and nature of school-based OT services. A significant portion of OT referrals are made to address a wide variety of behavior issues that extend well beyond the role of occupational therapists. OT caseloads are also affected by the maintenance of consult-only students. Staff interviews indicated that the process of scheduling all IEPs through the district office negatively impacts the efficient use of OT time. The industry standard for an OT caseload is 1 FTE to 45-55 students, and the district's average OT caseload is 1 FTE to 74 students. This is compensated by the addition of the full-time COTA.

Occupational Therapists Caseload Comparison

Provider	FTE	Caseload	Occupational Therapist FTE-Student Ratio	Aide	Industry Standard Ratio (OT FTE-to Student Caseload)
Occupational Therapist	2	147	1-to-74	1 FTE COTA	1-to-45-55

Source: Industry Standards and District Data

The caseloads for occupational therapy exceed industry standards by an average of 19 students per FTE.

Recommendations

The district should:

1. Continue the employment of a full-time COTA.
2. Develop and consistently implement a districtwide referral screening process for OT services.

3. Provide professional development for appropriate staff on the role and scope of occupational therapy services in the public school setting.

Adaptive Physical Education Teacher

The district employs 1 FTE APE teacher who carries a caseload of 67 students. The industry standard for APE caseload is 45-55 students. The APE teacher provides direct service to all his students, and none of them receive consult support only. Interviews with staff indicate a lack of understanding regarding the role and scope of APE service.

Adaptive Physical Education Caseload Comparison

Provider	No. of FTE	Caseload	Industry Standards for Students per FTE	Average No. of Students
APE	1.0	67	1-to-45-55	1-to-67

Source: Industry Standards and district data

The caseload for adaptive physical education exceeds industry standards by 12 students.

Recommendations

The district should:

1. Develop and consistently implement a district screening referral process for APE.
2. Provide professional development for appropriate staff on the role and scope of APE service.

School Nurse

The district employs a full-time school nurse assigned to serve special education students, and she performs her duties under the Special Education Department. A .60 FTE school nurse is employed to serve the general student population through the Child Welfare Office. The two nurses work together for greater efficiency when possible for purposes such as providing mandated health screenings. They both develop and oversee implementation of health care plans for their respective populations. The district also employs eight three-hour health clerks to serve the general population at each school site. The district contracts with an outside agency for 10 licensed vocational nurses (LVNs), and the use of these positions will be discussed later in this report. When an LVN is needed to support a general education student or students at a school site, the position is assigned to the health office and replaces the health clerk at that site. Therefore, five schools have a six-hour LVN stationed in the school site health office rather than a three-hour health clerk, and eight schools have the three-hour health clerk only. The health clerks and the five general education LVNs provide basic first aide and health-related clerical duties. When appropriate, they support implementation of student health care plans for the general education population under the supervision of the school nurse. LVNs can perform specialized procedures health care under the supervision of the school nurse. The .60 FTE general education school nurse therefore is required to train and supervise eight health clerks and five LVNs. The

full-time school nurse assigned to special education provides oversight and implementation of 51 active health care plans. She is responsible for all other health care functions for special education such as conducting health histories for all initial and triennial assessments and supervises five LVNs who serve special education students. The industry standard for school nurse caseloads is 1-to-2,815. The district would need 1.4more FTEs to meet that standard. The use of health clerks and LVNs partially addresses the school nurse caseload issue.

Recommendations

The district should:

1. Consider allocating LEA Medi-Cal funds to supplement existing school nurse staffing. See Medi-Cal LEA section of this report.
2. Analyze the range of services provided by school nurses, LVNs and health clerks to determine the most effective and cost-efficient staffing level to ensure the health and safety of all students.
3. Determine an equitable distribution of health services in relation to credentialed school nurses and support staff across all schools and all student populations. An inequality has been established by assigning one full-time school nurse to serve the special education population, .60 FTE school nurse to serve the general student population, three-hour health clerks to serve the general student population at eight schools and five six-hour LVNs to serve the remaining five schools.

Licensed Vocational Nurse

The district contracts with a private agency for licensed vocational nurse (LVN) services. During the 2014-15 school year, the district developed a job description to hire its own LVNs. Upon further consideration and cost analysis, it concluded continuing to contract with an outside agency was more cost-effective and provided more flexibility. In accordance with health guidelines and regulation, LVNs and health clerks work under the direction of the district's school nurse. LVNs require a significant amount of training and supervision from the school nurse. The LVN position can assist the school nurse, provide specialized procedures and health care, provide basic health assessments, administer medications and injections, and provide basic nursing care (The Green Book: Guidelines for Provision of Specialized Physical Healthcare Services in California Schools). Based on information gathered through the interview process, the LVNs perform duties in keeping with those guidelines. However, the 1.60 FTE school nurses can no longer complete the duties only they can perform and train and supervise the growing number of LVNs. The district has a contract for 10 total LVNs, five are contracted through the Special Education Department to serve students with IEPs, and five are contracted by the Child Welfare Department to serve general education students. The need for LVN services is based on the complexity of the individual student health care plans developed by the school nurse. Accordingly, the cost for each LVN contract varies. An average cost of \$47,115 was calculated from the existing contract amounts provided to FCMAT. Therefore, the average cost for the 10 LVNs is \$471,150. The district appears to be increasing its reliance on LVN services and not considering an increase in school nurse services. The district-provided average cost of a school nurse is \$86,452. The current cost of 10 LVNs would cover the cost of 5.44 FTE school nurse positions.

In addition to the duties directly assigned to the LVN, state guidelines permit the LVN to conduct the duties of the health clerk. The five general education assigned LVNs have replaced health clerks. Those five schools therefore receive six hours daily of health support rather than the standard three hours at the remaining eight schools.

The district hires LVNs to supplement the work of school nurses. The school nurses must train and supervise the growing number of LVNs in addition to their mandated duties. The continued reliance on LVN services rather than school nurse services may weaken the district's ability to meet its overall health responsibilities to students.

An inequality in service has been created by the replacement of three-hour health clerks at some school with six-hour contracted LVNs.

Recommendations

The district should:

1. Determine whether it can replace some LVN positions with a school nurse position(s) to maintain the district's ability to comply with the legal guidelines for public school health and safety.
2. Consider redistributing health service resources to ensure the health, safety and mandated requirements of all students are equitably addressed.

Nonpublic School or Agency, Mental Health and Alternative Programs

Nonpublic Schools (NPS)/Nonpublic Agency (NPA)

Education Code Section 56034 states the following:

Nonpublic, nonsectarian school (NPS) 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.

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

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

A district may contract with an NPA or NPS when it 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 students.

The district provided a description of the process taken directly from the SELPA procedural handbook. This process included the referral process, forms used, and assessment for placement decisions in addition to the IEP process. The district's special education director, along with an assigned school psychologist, case manages the NPS/NPA placements and services. The initial placement and services contracts are processed through the Business Department and approved through the board of education. In addition to students requiring NPS placements, the district has additional NPA contracts for nursing services and behavior intervention services.

The district's primary NPA costs are for LVN services totaling \$235,827.21 annually. Staff reported the private LVNs were willing to apply for local public school positions at a cost less than NPA costs, and the district had originally agreed to open these positions but did not follow through. The positions are all IEP-driven and could be increased or decreased according to IEP needs.

The Human Resource Department is not notified of the services contracted outside the district so it can seek potential internal positions and determine cost efficiency. The special education director makes changes to original contract amounts without prior approval or specific processes in place.

The Special Education Department provided documents on site of the individual student contracts of NPS and NPA placements for the 2015-16 school year. The SELPA provided a simple chart based on the past three years budget accountability of the student contracts.

NPS/A

2012-13	2013-14	2014-15	2015-16
\$367,180.00	\$403,589.84	\$671,745.00	\$687,876.73

Based on this information, the district has increased NPS and NPA costs by \$284,286.89 since 2013-14. The district has also decreased the number of NPS placements by four students over the last three years with a total of nine students placed in an NPS. The district office cabinet members were unaware of how the Special Education Department made placement decisions including how a student is returned to a less restrictive environment that may involve a return to the district.

County Office of Education and Other Alternative Placements

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

The district contracts with the county office and other LEAs for services delivered to approximately 230 district students at the average cost of \$14,336.63 per student and approximately \$3,297,425.57 annually. The county office bill-back cost of a paraeducator is \$48,000 per year, and district paraeducators are only \$24,908.20 per year including statutory and health/welfare benefits. The district is concerned about the number of students placed in county-office-operated programs beginning at the preschool level. The district does not assess preschool students. They are referred to the county through the birth to five-year-old program, which is the regional center. When determining eligibility, students who are not transitioning from the regional center are assessed using county office staff.

Mental Health

The costs of mental health and residential services have transferred to school districts through Assembly Bill (AB) 114 Statutes of 2011, which was signed into law on June 30, 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. With the passage of this law, school districts are now solely responsible for ensuring that disabled students receive special education and related services, including some services previously arranged for or provided by county mental health.

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

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

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

Recommendations

The district should:

1. Closely monitor the placement and services provided through the NPS and NPA monthly and determine how to decrease them.
2. Hold collaborative meetings with director of special education, chief business official and chief academic official regularly to discuss how to decrease and increase placements and services if needed. If the NPS/A budget requires an increase, the director of special education should formally communicate the potential need to the chief officials before a decision is made at the IEP meeting to allocate appropriate funds. A process should be established to determine needs and potential costs.
3. Consider hiring its own LVN staff in lieu of contracting with an NPA.
4. At the monthly meetings mentioned above, closely monitor the residential placements and mental health costs of all students in nonpublic schools and make budget adjustments to the amount the district will receive as changes occur.
5. Provide its own assessments at the preschool level, and refer to the county office if needed.
6. Utilize a consistent tracking process to inform the business office of projected placements, services and costs of students.
7. Consider expanding district programs at a later date. Although it may be less expensive to serve students directly, the district does not have the infrastructure nor the expertise to begin expanding programs at present.
8. Track the cost of all students requiring special education, especially those receiving services separately from the district.
9. Communicate all expenses and change of placements to the business office monthly.

Medi-Cal LEA

A review of records shows the district underutilizes options for LEA Medi-Cal billing. An analysis of the general student population suggests that approximately eight of 10 students would be eligible to participate in this type of billing if they received a billable service. The free and reduced meal count from Ed Data indicates that 86.2% of the total population is eligible for free and reduced meals. Of every 100 active IEPs that provide a LEA billable service, 86 should receive reimbursement, and the average LEA reimbursement for a psycho-educational assessment is approximately \$160. The average payment for an occupational therapist (OT) assessment is \$100. Targeted case management should result in reimbursement of \$8.21 per 15 minutes. The district does not bill for transportation. Each day an eligible student is transported to and from school to receive a billable service, the district can be reimbursed \$18. SLP interns are unable to bill for LEA Medi-Cal, and licensed and credentialed SLPs do not carry an active caseload so there is no billing for speech services. In most districts, speech and language billing is a significant portion of LEA Medi-Cal income. Adelanto Elementary billing has also been negatively affected by the fact that the billing submission by district providers is treated as voluntary and optional.

The district should maximize LEA Medi-Cal funding. Based on an analysis of information provided for this review, the district has averaged \$239,250 in net LEA Medi-Cal income over the last four years. A conservative estimate indicates the district should be able to increase annual LEA billing net income to \$400,000-\$425,000, an increase of \$160,750 - \$185,750 annually. The district's Medi-Cal billing agent can provide support in this effort. Among other types of support, the billing agent should be able to help make the actual billing process significantly simpler for the district's LEA providers. In conjunction with other enhancements and incentives for providers, the district should be able to increase active billing submissions by all providers.

Recommendations

The district should:

1. Enlist the support of the district's billing agent to research and develop all avenues of reimbursement for LEA Medi-Cal Services.
2. Initiate billing through transportation for eligible services.
3. Simplify procedures for provider tracking and submission of billable services.
4. Increase provider accountability for compliance with billing expectations through incentives and other measures.
5. Consider using a portion of a clerical position to monitor billing submission and communicate with providers on effective billing tips, incentives, etc. to stimulate billing activities.

Identification

The current identification rate for K-8 district of residence students with disabilities is 17.9%, which exceeds the statewide average of 10.1%. The estimated cost of this overidentification is \$4.9 million for the 2015-16 school year.

FCMAT compared the district percentage of special education students by disability to the statewide average and found that the district exceeds the state in speech or language impairment by 3.7% and exceeds the countywide average by 5.7%. The district also exceeds the specific learning disability statewide average by 5.7% although it is within the countywide average. The chart below reflects the comparison.

Disability	District	County	State
Intellectually Disabled	5.2	6.3	6.0
Hard of Hearing	0.8	1.0	1.4
Deaf	0	0.2	0.4
Speech and Language Impaired	25.9	20.5	22.2
Vision Impaired	0.3	0.4	0.5
Emotionally disturbed	3.3	3.1	3.3
Orthopedically Impaired	0.6	1.1	1.7
Other Health Impaired	10.5	9.5	10.6
Specifically Learning Disabled	45.2	45.8	39.5
Deaf/Blind	0	0.0	0.01
Multiply Disabled	1.1	1.7	0.8
Autistic	6.1	9.6	12.6
Traumatic Brain Injured	0.4	0.2	0.2

Source: CASEMIS 12-1-2014

The staff indicated that the district overidentifies because it lacks Response to Intervention (RtI) or Multi-Tiered System of Supports (MTSS). Although documentation demonstrates attempts to utilize consistent student study team (SST) forms and processes, the district does not communicate this process regularly, and many employees are unaware of it due to the high rate of staff turnover. Almost all staff interviewed indicated the district does not have alternative general education interventions or districtwide support for differentiating curriculum for all learners. As a result, school sites determine their own priorities about whether to utilize site funds for specific alternative curriculum and support personnel, and staff indicated special education is the only avenue for struggling learners to receive additional interventions. As indicated earlier in this report, the district does not have a formalized MTSS or a RtI designed to respond to academic and behavioral issues students may face during the school year. Additionally, staff reported students remain in special education instead of transferring (“exiting”) and utilizing a formalized MTSS since minimal general education interventions are available for those who do not qualify for special education. This approach violates state and federal regulations (IDEA 2004 and Education Code 56000-56001) on maintaining placement in least restrictive environment and significantly delays students’ access to the initial levels of intervention before consideration for special education services.

In 2004, the reauthorization of the Individuals with Disabilities Education Act (IDEA 2004) provided support for models that include response to scientific, researched-based interventions. The law stated that these methods may be used as an alternative to the discrepancy model when

identifying students as learning disabled. IDEA 2004 also shifted researched-based interventions from special education to general education, stressing that this method would no longer be limited to special education students, but would apply to all students. The law left it up to each individual state to develop its own guidelines and regulations. RtI, which is now referred to as Response to Instruction and Intervention (RtI2), provides districts with a method to drive educational decisions and measure academic growth.

The California Department of Education (CDE) information states the following:

California has expanded the notion of Response to Intervention to RtI2. RtI2 is meant to communicate the full spectrum of instruction, from general core, to supplemental or intensive, to meet the academic and behavioral needs of students. RtI2 integrates resources from general education, categorical programs, and special education through a comprehensive system of core instruction and interventions to benefit every student.

The CDE further states that RtI2 is used in the following three ways:

1. Prevention:

All students are screened to determine their level of performance in relation to grade-level benchmarks, standards, and potential indicators of academic and behavioral difficulties. Rather than wait for students to fail, schools provide research-based instruction within general education.

2. Intervention:

Based on frequent progress monitoring, interventions are provided for general education students not progressing at a rate or level of achievement commensurate with their peers. These students are then selected to receive more intense interventions.

3. Component of specific learning disability (SLD) determination:

The RtI2 approach can be one component of SLD determination as addressed in the Individuals with Disabilities Education Act (IDEA) 2004 statute and regulations. The data from the RtI2 process may be used to demonstrate that a student has received research-based instruction and interventions as part of the eligibility determination process. The CDE is in the process of further defining how RtI2 could be used in the eligibility process.

Source: <http://www.cde.ca.gov/sp/se/sr/documents/sldeligibiltyrti2.doc> Determining Specific Learning Disability Eligibility Using Response to Instruction and Intervention

Recommendations

The district should:

1. Evaluate the identification procedures for speech and language issues and specific learning disabilities to ensure it aligns closely to the statewide average identification rate in these areas and decreases identification.
2. Focus on the development of speech and language interventions.

3. Develop exit criteria for speech and language.
4. Clearly define and communicate a districtwide SST process to help students at the sites succeed without special education interventions.
5. Consider universal screening to identify at-risk students.
6. Develop a districtwide system of data collection and progress monitoring.
7. Develop clear criteria for a prereferral system.
8. Plan regular collaboration time with Curriculum and Instruction, site administrators and special education administrators to develop research-based interventions and materials districtwide. Use the same approach to develop a districtwide data collection and progress monitoring system.
9. With all site principals, develop and document a plan to begin implementing a comprehensive RtI2 model.
10. Establish a district-level leadership team to guide the implementation of RtI2.
11. Develop a process to allow SST members and psychologists to use RtI2 as part of the decision-making process for referral to special education.

Transportation

Transportation Funding & Finance

School transportation is the most poorly funded element of California's education budget. Until 1977, school districts reported their operational costs and were fully reimbursed in the subsequent year. However, California gradually reduced the percentage of reimbursement after the passage of Proposition 13. In the 1982-83 school year, the state capped the funding for each district based on 80% of the reported costs at that time. Occasional cost-of-living adjustments (COLAs) were made over the years, but as costs increased, the static funding covered smaller percentages of need. In the 2007-08 school year, the funding covered approximately 45% of the statewide approved costs. The data for individual districts varied greatly depending on demographics and need. During the Great Recession, California reduced all categorical program funding by approximately 20%, and the decrease to pupil transportation funding was never restored. The 2013-14 school year was the first year of the Local Control Funding Formula (LCFF). Most categorical programs were folded into this formula; however, pupil transportation funding was not. Instead, funding was frozen at the 2012-13 level and maintenance of effort (MOE) was required, meaning districts needed to spend at least as much as they received.

In the 2012-13 fiscal year, the district received \$327,201 for general education home-to-school transportation and \$15,142 for serving students who were severely disabled/orthopedically impaired (SD/OI). Beginning with the 2013-14 fiscal year under the LCFF, the state revenue apportionment was combined and received by the district within the LCFF identified for pupil transportation. The district's pupil transportation apportionment is static remaining the same as the 2013-14 amount for this purpose. The low state average apportionment does not reflect poor management or inefficient program oversight, but originated from pupil transportation program costs in the 1982-83 budget year. The district's enrollment was much smaller 33 years ago. At one time, the California Department of Education (CDE) collected pupil transportation data (Form TRAN), which was published annually and used to compare revenue to expenses. However, with the LCFF, CDE no longer collects that data. Below is a table identifying the last two year's data reported by the district on Form TRAN.

TRAN Data

	2010-11 HTS	2010-11 SD/OI	2011-12 HTS	2011-12 SD/OI
# Buses	12	14	11	16
# Students	2,500	300	2,450	250
w/ IEP	25	300	5	250
Miles	250,000	250,000	156,363	122,759
Revenue	\$327,201.00	\$15,142.00	\$327,201.00	\$15,142.00
Approved Cost	\$1,215,860.00	\$1,039,690.00	\$2,246,561.00	\$834,573.00
Cost/Mile	\$4.823	\$3.823	\$10.665	\$5.429
Cost/Pupil	\$482.340	\$3,185.448	\$680.638	\$2,665.846
Bus Acq. Cost	\$9,989.00	\$84,056.00	\$587,997.00	\$168,112.00

Notes:

1. HTS refers to regular education students and non-severe special ed students.
2. SD/OI refers to severely disabled, orthopedically impaired students.
3. 2010-11 student and miles data does not appear accurate.
4. Cost per mile and cost per pupil numbers are relatively low compared to state averages indicating efficient routing and cost controls.

The district's 2014-15 actual expenses were \$1,634,120 for home-to-school transportation and \$1,748,690 for SD/OI. The 2015-16 budget for home-to-school transportation is \$1,576,342 and SD/OI is \$1,638,937. The current budget includes a reduction of approximately \$167,531, which is the result of reduced expenditures from last year. That year, the district had an external contract with the Hemet Unified School District for school buses and drivers for a large portion of the school year because of bus and staffing shortages. State revenue covers approximately 10.6% of the district's pupil transportation expenses, significantly less than the statewide average and is also a reflection of the district's rapid growth and expansion and the static nature of state funding for pupil transportation.

In addition to pupil transportation support for district students, the transportation program falls within the district's Maintenance, Operations & Transportation Department and performs vehicle maintenance on other district support vehicles. The district departments that operate those vehicles such as Grounds, Maintenance, Food Service and general district pool vehicles are not charged for the cost of vehicle repair parts, fluids, supplies, fuel and labor repair time. Interprogram fund transfers are also not identified for these purposes. The district should appropriately track and charge all vehicle maintenance repairs, service and fuel to the appropriate department assigned the vehicle. By not appropriately separating transportation vehicle maintenance expense and fuel usage, the district's pupil transportation program absorbs those nonbus expenses.

Recommendation

The district should:

1. Appropriately track and charge all vehicle maintenance repairs, service and fuel to the program assigned the vehicle.

Special Education Student Identification & Routing

The district has an approximate student enrollment of 8,410, with approximately 1,446 students having individualized education programs (IEPs). This represents 17.9%, a high percentage of students receiving special services. District-provided documentation dated June 2015 identified 282 students with IEPs that require transportation support as a necessary related service to their handicapping condition or program location. However, an actual hand count by FCMAT found that approximately 314 students receive transportation and are assigned to district special education routes. The percentage of special education students identified as eligible and receiving transportation support is 21.7, more than twice the average of districts recently assessed by FCMAT. The district overidentifies special education students requiring transportation. It should assess its IEP team identification process for evaluating a pupil's need for transportation support as it relates to their handicapping condition. The district should develop and implement the use of a chart called a "decision tree" to help the IEP team identify transportation as a necessary related service and ensure consistency in offering the service. The Desert/Mountain SELPA has created special education transportation guidelines for IEP team leaders that could be fully implemented by the district's IEP teams. The guidelines are very detailed and discuss the need for transportation and other options that can be explored. The district does not appear to actively utilize the Desert/Mountain SELPA guidelines. District IEP teams should be trained on the decision options available, either those identified in the Desert/Mountain SELPA document or through the creation of a district set of criteria identified in a decision tree.

The district operates 20 dedicated special education school bus routes. Based on the 314 special education students receiving transportation support, the district has achieved an average student load factor of 15.7 students per route, which suggests efficient routing. School start and end times are also sufficiently separated, allowing for buses to serve multiple district schools and program sites. At the beginning of the school year, the district had 130 special education students to place on routes but increased by 184 students during the first few months. The high increase of students creates a huge burden on transportation staff. The district should evaluate its annual timeline and reporting time for special education student transportation to ensure sufficient time for transportation staff to route and communicate with parents in a timely fashion.

All Special Education Department staff are cross-trained to generate special education student transportation requests. The individual generating the special education transportation request will email the request to the district's Transportation Department for scheduling. At the beginning of each school year, the Special Education Department generates a list of students requiring transportation support as a related service. After the initial school start list is developed, individual student transportation request forms are generated.

The district does not provide transportation support by private taxi cab or parent "in-lieu" transportation contracts. Nine students are transported by their assigned nonpublic school, with the expense included in the NPS contract. The NPS contracts identify service for 180 regular school days and 20 Extended School Year (ESY) days. The average cost for the NPS contract transportation is \$3,640 per pupil, per year. The current cost for the district to provide special education student transportation is \$1,638,937 based on 314 students receiving service, or \$5,219 per student. The NPS cost is less expensive than the district cost to transport. The district should maintain transportation arrangements within the contracts for NPS students.

The transportation staff manually generates school bus route sheets, and manually routes all students at the beginning of the school year. Afterward, district drivers are responsible for adding or deleting students as necessary, revising their route directions and making personal contact with the parents of students affected by routing changes. The district driving staff has a high level of responsibility in making the necessary routing changes, ensuring routing efficiency, maintaining appropriate student ride times, and there is a high level of communication with parents. The district should exercise more control in generating special education school bus routes and communicating with parents about route changes. The district previously owned an industry standard electronic routing system, TransTraks, and owns another industry standard electronic routing system, Edulog, but apparently utilizes neither system. It should explore the possibility of implementing either of these systems.

Another section of this report addresses transportation program staff absenteeism. This is a serious issue that causes district bus routes to run late, often resulting in students being late to their class. Staff indicated that high absenteeism is historical; parents and district staff appear to accept that buses and students will be late.

The district appears to comply with Board Policy 3541.2 on special education transportation. The district does not have extensive board policy or administrative regulations specific to student transportation, but it complies with the policies reviewed.

The district operates 20 dedicated special education bus routes. A review of routes (district source document) found that most drivers appear to be assigned a route totaling either less than or greater than their individual contract assignment time (see chart below).

Route Times vs. Contract Times for Special Education Bus Drivers

Route	Daily Route Time	Daily Contract Time
201	10.5	8
202	6.25	6
203	6.25	5.75
204	7.25	6.25
205	6.75	6.75
206	6.75	6.75
207	7.5	8
208	6.25	7
209	7.75	7.75
210	5.75	6.5
211	6	5
212	6.25	6.5
213	6.5	6.25
214	6.75	7.25
215	6.5	6.25
216	7.75	6.25
217	7.5	7.75
219	7.5	6.5
220	8.25	7.25
221	6.25	6.5
Total	140.25	134.25
Notes:		
1. No Route 218		
2. 20 total special ed routes		

Two routes exceed eight hours daily, one as high as 10.5 hours daily, and transportation staff did not appear to be aware of this. This may occur partly because district drivers have the responsibility of routing themselves. Permitting routes to be in excess of their contracted time makes the district vulnerable to collective bargaining unit issues and complaints from staff. The district appears to be routing in any manner possible because of the high volume of students added immediately prior to and following the start of the school year (after initial planned routing is complete). The district cannot prevent last-minute identification of students requiring transportation support for those moving into the district as the school year starts. However, a more methodical approach would provide more planning time for routing. Additionally, the district appears to be adding too many students to some routes, causing them to exceed contract time or eight hours daily. The district should align driver contracts appropriately to reflect the assigned work, ensuring contracts are distributed according to district personnel procedures and collective bargaining agreements. The district should also ensure that additional routes are added to prevent drivers from exceeding eight hours daily. All existing driver contract times should be fully utilized by route assignment or related transportation work. All district routes exceeding five hours qualify staff for the highest level of district health and welfare benefits.

Recommendations

The district should:

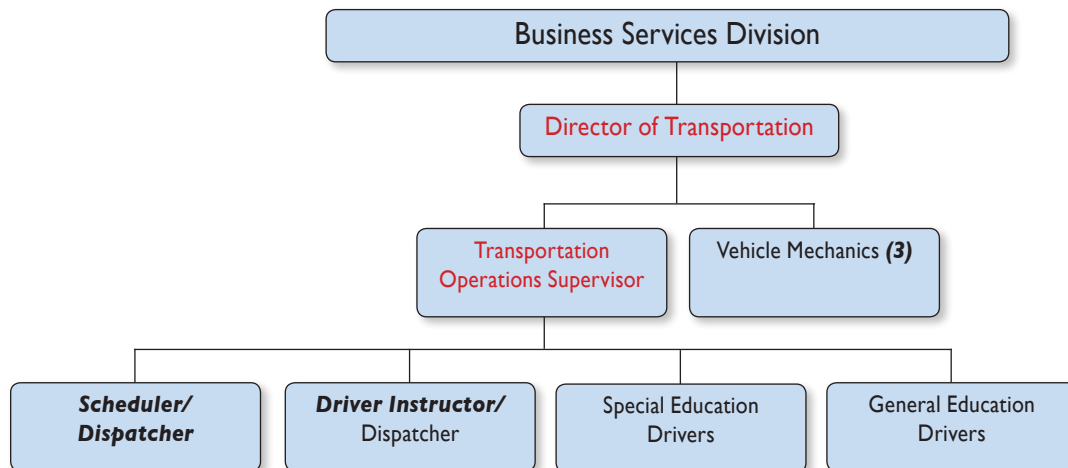
1. Evaluate its IEP team identification process for evaluating a pupil's need for transportation support as it relates to their handicapping condition.
2. Develop and implement a decision tree to help the IEP team identify transportation as a necessary related service and to ensure consistency in offering the related service.
3. Train IEP teams on the options available, either those identified in the Desert/Mountain SELPA document or through the creation of a district set of criteria included in a decision tree.
4. Examine its annual timeline and reporting time for special education student transportation to ensure there is sufficient time for transportation staff to route and communicate with parents in a timely fashion.
5. Maintain transportation arrangements in the contracts for NPS students.
6. Exercise more control in generating special education school bus routes and communicating with parents on route changes.
7. Explore the benefits of implementing either of its two electronic routing systems.
8. Align driver contracts appropriately to reflect assigned work, ensuring the documents are distributed according to district personnel procedures and collective bargaining agreements. The district should also ensure that additional routes are added to prevent drivers from exceeding eight hours daily.
9. Ensure that all existing driver contract times are fully utilized by route assignment or related transportation work.

Staffing

The district's transportation program is in the Maintenance, Operations & Transportation (MOT) Department. This model is common for smaller programs typically consisting of 20 or fewer bus routes. Transportation responsibilities, including vehicle maintenance, are supervised by a district coordinator of transportation and supported by one secretary, two vehicle mechanics, 33 full-time or part-time school bus drivers, and four part-time school bus aides. The department also has shared supervisory responsibility for five licensed vocational nurses (LVNs) contracted by the Special Education Department.

The district's transportation program operates 20 special education bus routes, 12 home-to-school routes and one overflow route, totaling 33 regularly scheduled bus routes. The district has 45 school buses in its fleet and approximately 24 additional district support vehicles. The transportation program is moderate in size and has grown steadily over the past two decades as a result of the district's rapid expansion. The program has the potential to grow tremendously in the future as the district expands, with the rapid suburban growth expected in the high desert region of San Bernardino County. The district should consider creating an individual Transportation Department in the district's Business Services Division.

The organizational chart below shows a suggested staffing structure to meet the demands of the Transportation Department.



Reclassification of existing positions

Recommended new position

The district should consider the organizational benefits of reclassifying the coordinator of transportation and secretary to district director and operations supervisor classifications, respectively. With 33 routes and the expectation of continued growth, the district should also develop a classification of driver instructor/dispatcher. The district has 33 permanent driving positions and substitute staff, a relatively large driving workforce to provide initial and renewal training for as well as regularly scheduled in-service safety training. The transportation coordinator struggles to maintain these functions. Two delegated behind-the-wheel (BTW) trainers can augment that portion of training to assist the driver instructor as needed.

Under the suggested Transportation Department model, the district's vehicle mechanics could fully absorb all support fleet preventive maintenance and repairs. However, a third mechanic is needed to meet both demands, assist in absorbing all support fleet vehicle maintenance and future fleet growth. The district should explore the cost savings of fully integrating the vehicle maintenance program to absorb all district vehicle maintenance requirements.

The district has a competitive health and welfare benefit package. Staff working 50% receive 75% of benefits, and those contracted to work five or more hours receive full benefits with a contribution amount. A district employee plus one dependent pays \$189.78, and the full family contribution is \$273.55. The district's step one starting salary is \$16.46 per hour, which is competitively close enough to the two surrounding school districts to retain its staff.

During the site visit, staff reported an average of 4-5 absences daily, which is more than 15% of drivers. Absences are significantly higher on some days, routinely causing late buses and students. The district's Human Resource staff should assist transportation program staff in investigating and managing absenteeism.

Recommendations

The district should:

1. Consider the organizational benefits of reclassifying the coordinator of transportation and secretary to director and operations supervisor, respectively.
2. Develop the classification of driver instructor/dispatcher.
3. Explore the cost savings of fully integrating the vehicle maintenance program to absorb all district vehicle maintenance requirements and of adding a third vehicle maintenance mechanic.
4. Assist the transportation program staff in investigating and managing absenteeism.

Vehicle Maintenance & Fleet

The district's last and most current California Highway Patrol (CHP) Motor Carrier Terminal grade was satisfactory, the highest grade that can be achieved. The district has a recent history of receiving satisfactory grades on its annual terminal, vehicle and records inspections.

The district has a total school fleet of 45 large and small buses and recently purchased a large number of units, resulting in an average age of 7.91 years. At the time of FCMAT's visit, eight units were out of service for short and long-term repair, and staff reported a significant number of buses are regularly out of service. The vehicle maintenance team has been with the district a relatively short period of time. Previously, the district had one mechanic, and contracted a high percentage of the vehicle maintenance work for repairs. The current vehicle maintenance staff is working to bring the fleet up to a higher standard and organizing service and repair work to be completed internally. However, due to the significant number of buses back logged for repairs and the overall size of the fleet, the district should assess the potential vehicle maintenance savings of increasing by one mechanic in the near future.

Although the district fleet has 45 buses, only 18 of them are special education units. The district operates 20 special education bus routes, with two routes performed in large transit-style buses. The district should develop a long-range plan assessing its growth in home-to-school and special education transportation to determine future fleet purchases. This would address the shortage of special education units and the annual growth in special education transportation.

FCMAT visually assessed a sample of the district's school bus fleet. The interior and exterior of all vehicles inspected were extremely dirty. Keys were routinely left in the bus ignition without doors locked in the late afternoon, when the vehicles would presumably not be utilized again until the next morning. Numerous bus seats were ripped and many poorly repaired. The district should create a regular wash schedule or wash contract ensuring all vehicles are washed appropriately and regularly. Additionally, the district should invest time and labor as needed by driving staff to ensure buses are swept and dusted daily, with deeper-cleaning regularly performed as needed.

According to district source documentation, it has 24 support vehicles: 24 trucks, autos or vans and six trailers. Five vehicles appear to be assigned to the district's Food & Nutrition Department, eight assigned to Maintenance & Operations and 11 for general district use as motor pool vehicles. No district students are transported using district nonschool bus vehicles.

The district should increase mechanic staffing by one to better maintain school buses and assume full maintenance responsibility for district support vehicles.

The district has vehicle preventive maintenance schedules and appears to perform maintenance in a timely manner and on a regular schedule based on accumulated mileage and calendar days of operation. The mandated 45-day/3,000 mile school bus safety inspections are monitored and scheduled for inspection as required by CCR Title 13. Manually generated paper work orders are utilized to track vehicle repairs and maintain preventive maintenance schedules and school bus safety checks. Vehicle maintenance schedules, school bus safety checks, inventory parts and supply control and repair orders are not electronically generated using an industry standard vehicle maintenance software system. The district should explore the efficiencies and potential cost savings of implementing a robust electronic vehicle maintenance software system.

Recommendations

The district should:

1. Assess the potential vehicle maintenance savings of increasing by one mechanic in the near future.
2. Develop a long-range plan assessing its growth in home-to-school and special education transportation to determine future fleet purchases. This should address the shortage of special education units as well as the annual growth in special education transportation.
3. Create a regular schedule or contract ensuring all vehicles are washed appropriately and regularly.
4. Invest time and labor, as needed by driving staff, to ensure buses are swept and dusted daily with deeper cleaning regularly performed as needed.
5. Ensure that their driving staff perform complete vehicle post-trip closeout procedures to include daily cleaning and securing by removing keys from the ignition.
6. Explore the efficiencies and potential cost savings of implementing a robust electronic vehicle maintenance software system.

Driver Training

FCMAT performed a sample review of the district's driver training records, which appeared to be well organized, current and compliant with laws and regulations. However, a review of approximately 85% of the driver records found that they received little training in the immediate past six months. One 45-minute in-service was performed on June 4, 2015. No evidence indicated that any behind-the-wheel training or other classroom in-service was recorded. The district's collective bargaining agreement specifically indicates that 12 hours of in-service time will be provided annually and scheduled monthly for all school bus drivers. The district may be out of compliance with the agreement in this area. The district should immediately institute regularly scheduled monthly in-service sessions for all school bus drivers.

The district has a Board Policy (BP 3543) on the mandate for a transportation safety plan and a limited visibility policy; it was unable to provide a sample to validate the plan exists and is on file at the schools as required by EC 39831.3. The district should immediately create this plan and make it available as required. Additionally, EC Section 39831.5 requires annual school bus evacuation and safety instruction; however, the district had not scheduled this as of the date of FCMAT's visit. The district should immediately schedule these events and document them when they occur.

The district has a school bus driver's handbook that is mostly composed of state laws and regulation language. The document does not detail district transportation practices and common items of interest for school bus drivers on the district protocol for transportation of students, field trips and best practices in the work place. The district should update the school bus driver's handbook.

The transportation coordinator maintains DMV pull notices for all appropriate staff. New staff additions and deleted staff are maintained and on file. The DMV driver record printouts are collected by the risk manager and given to the transportation coordinator for review and appropriate filing. The human resources staff coordinates all pre-employment and random drug and alcohol testing.

Recommendations

The district should:

1. Immediately institute regularly scheduled monthly in-service sessions for all school bus drivers.
2. Immediately create a transportation safety plan and make it available as required.
3. Immediately schedule annual school bus evacuation drills, safety instruction and documentation of such.
4. Update the school bus driver's handbook.

Transportation Facility

The district's transportation terminal is located in the central office complex. The property for fleet parking is large, with facilities for office space that are shared with the maintenance and operations staff, but the main transportation functions and housing are divided into three parts that are not conveniently located close to one another. Vehicle maintenance is separated from the transportation supervisory office and the driver's staff lounge, which is problematic for supervision and effective daily workflow. Internal communication is hindered by the separation of the drivers from the shop and the main transportation office. The district should evaluate its facilities and identify an immediate or long-range plan for the transportation main office area, vehicle maintenance garage area and driver's lounge so that they are contiguous with one another.

The district's vehicle maintenance shop area is in disarray, dirty and lacks general housekeeping. Inventory supplies are not securely located in one area or tracked manually or electronically. As a result, inventory stock from the shelf appears not to be routinely used, probably because staff is not fully aware of the existing parts and supplies. The district should improve housekeeping and organization, institute regular cleaning intervals and secure parts and supply inventory in an organized fashion, with all inventory supplies identified manually or electronically.

The transportation facility has on-site unleaded gasoline and diesel storage located in above-ground Convault tanks. This includes a storage capacity for 1,000 gallons of unleaded fuel and 2,000 gallons of diesel, a relatively small fuel capacity for the size of the growing school bus and support vehicle fleet. The fuel systems are monitored electronically with an industry standard fuel security and inventory system. However, the system was nonoperational when FCMAT was on-site as a result of fuel data not being electronically downloaded. The fuel system is made nonoperational after hours for security. The district should enlist the manufacturer to train district staff in the proper electronic maintenance and downloading of fuel data.

Recommendations

The district should:

1. Examine its facilities and identify an immediate or long-range plan to co-locate the transportation main office area, vehicle maintenance garage area and driver's lounge area contiguous with one another.
2. Implement improved housekeeping organization, institute regular cleaning intervals and secure parts and supply inventory in an organized fashion, with all inventory supplies identified manually or electronically.
3. Enlist the manufacturer to train staff in the proper electronic maintenance and downloading of fuel data.

Transportation Technology

All transportation office and shop areas had computers for appropriate staff. Technology appears to be generally restricted to the traditional programs such as district e-mail, Word and Excel programs. The Transportation Department does not use standard industry specific software, including the two routing software systems discussed earlier in this report. The district should explore transportation routing, GPS and vehicle maintenance software for greater work efficiency and a better work product.

Recommendation

The district should:

1. Explore transportation routing, GPS and vehicle maintenance software for greater work efficiency and a better work product.

Appendix

A. Study Agreement



**FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
June 1, 2015**

The Fiscal Crisis and Management Assistance Team (FCMAT), hereinafter referred to as the team, and the Adelanto Elementary 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. Analyze special education teacher staffing ratios and class and caseload sizes using the statutory requirements for mandated services and statewide guidelines.
2. Review the efficiency of special education paraeducator staffing throughout the district. Analyze the procedures used to identify the need for paraeducators and the process used to monitor the resources for allocating paraeducators, and determine the ongoing need for continued support from year to year (include 1:1 paraeducators).

3. Analyze all staffing and caseloads for related service providers: speech therapists, psychologists, occupational/physical therapists, behavior specialists, adaptive physical education teachers, credentialed nurses and others.
4. Review the use of resource allocations for nonpublic schools and agencies, mental health services and alternative programs, and make recommendations for greater efficiency.
5. Review the revenues and allocations for Medi-Cal LEA and determine areas for greater efficiencies.
6. Determine whether the district over identifies students for special education services as compared to the statewide average, and make recommendations that will reduce over identification, if needed.
7. Evaluate transportation services for special education students to ensure efficiency and identify potential cost savings.
8. Review the special education transportation delivery system, including but not limited to the role of the IEP, routing, scheduling, operations, and staffing.
9. Analyze the use of contracted LVN services.

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 William P. Gillaspie, Ed. D., Deputy Administrative Officer, Fiscal Crisis and Management Assistance Team, Kern County Superintendent of Schools Office. The study team may also include:

<i>A. Dr. Jackie Kirk-Martinez</i>	<i>FCMAT Consultant</i>
<i>B. Anne Stone Consultants</i>	<i>FCMAT Consultant</i>
<i>C. Don Dennison</i>	<i>FCMAT Consultant</i>
<i>D. Michael Rea</i>	<i>FCMAT Consultant</i>
<i>E. Tim Purvis</i>	<i>FCMAT Consultant</i>
<i>F. To be determined</i>	<i>FCMAT Consultant</i>

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 field work; any delay in the receipt of the requested documents may affect the start date of the project. Upon approval of the signed study agreement, access will be provided to FCMAT's online SharePoint document repository, 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:	October 20, 2015 at 9 a.m.
Staff Interviews:	October 20-22, 2015
Exit Meeting:	October 23, 2015 by 10 a.m.
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. **COMMENCEMENT, TERMINATION AND COMPLETION OF WORK:**

FCMAT will begin work as soon as it has assembled an available and appropriate study team consisting of FCMAT staff and independent consultants, taking into consideration other jobs FCMAT has previously undertaken and assignments from the state. The team will work expeditiously to complete its work and deliver its report, subject to the cooperation of the district and any other parties from whom, in the team's judgment, it must obtain information. Once the team has completed its field work, it will proceed to

prepare a preliminary draft report and a final report. Prior to completion of field work, the district may terminate its request for service and will be responsible for all costs incurred by FCMAT to the date of termination under Section 4 (Project Costs). If the district does not provide written notice of termination prior to completion of field work, the team will complete its work and deliver its report and the district will be responsible for the full costs. The district understands and agrees that FCMAT is a state agency and all FCMAT reports are published on the FCMAT website and made available to interested parties in state government. In the absence of extraordinary circumstances, FCMAT will not withhold preparation, publication and distribution of a report once field work has been completed, and the district shall not request that it do so.

8. INDEPENDENT CONTRACTOR:

FCMAT is an independent contractor and is not an employee or engaged in any manner with the district. The manner in which FCMAT's services are rendered shall be within its sole control and discretion. FCMAT representatives are not authorized to speak for, represent, or obligate the district in any manner without prior express written authorization from an officer of the district.

9. INSURANCE:

During the term of this agreement, FCMAT shall maintain liability insurance in an amount not less than \$1 million unless otherwise agreed upon in writing by the district, automobile liability insurance in the amount required under California state law, and workers compensation as required under California state law. FCMAT shall provide certificates of insurance, with additional insured endorsements, indicating applicable insurance coverages prior to the commencement of work.

10. HOLD HARMLESS:

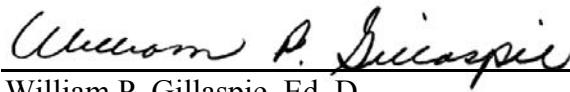
FCMAT shall hold the district, its board, officers, agents and employees harmless from all suits, claims and liabilities resulting from negligent acts or omissions of its board, officers, agents and employees undertaken under this agreement. Conversely, the district shall hold FCMAT, its board, officers, agents and employees harmless from all suits, claims and liabilities resulting from negligent acts or omissions of its board, officers, agents and employees undertaken under this agreement.

11. CONTACT PERSON

Name: Dr. Amy Nguyen-Hernandez
Telephone: (760) 246-8691
E-mail: amy_nguyen-hernandez@aesd.net

Dr. Edwin Gomez, Superintendent
Adelanto Elementary School District

Date



June 1, 2015

William P. Gillaspie, Ed. D.
Deputy Administrative Officer
Fiscal Crisis and Management Assistance Team

Date