



CSIS California School Information Services

San Juan Unified School District

Special Education Review

November 9, 2016



Joel D. Montero
Chief Executive Officer





November 9, 2016

Kent Kern, Superintendent
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 935608

Dear Superintendent Kern:

In January 2016, the San Juan Unified School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement to review the San Juan Unified School District's special education programs and services. Specifically, the agreement states that FCMAT will perform the following:

1. Review the district's implementation of Student Success Teams (SST), Response to Intervention (RtI), and Multi-Tiered System of Supports (MTSS) and provide recommendations as needed.
2. Determine whether the district is over identifying students for special education services compared to statewide average, and make recommendations that will reduce over identification, if needed.
3. Analyze whether the district provides a continuum of special education and related services from preschool through 22 years of age, and include an analysis of the least restrictive environments.
4. Analyze special education teacher staffing ratios, class and caseload size using the statutory requirements for mandated services and statewide guidelines.
5. Review the efficiency of staffing allocation of special education paraeducators throughout the school district. Review the procedures for identifying the need for paraeducators, the process for monitoring the resources for allocating paraeducators and determining the ongoing need for continued support from year to year. (Include classroom and 1:1 paraeducators)
6. Provide an analysis of all staffing and caseloads for related service providers: speech therapists, psychologists, occupational/physical therapists, behavior specialists, adaptive physical education teachers, credentialed nurses and others.

FCMAT

Joel D. Montero, Chief Executive Officer

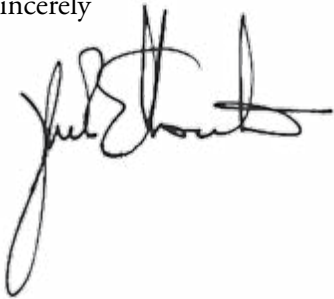
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7. Review special education department staffing and organization in the district's central office, including staffing comparisons, to ensure that clerical and administrative support, programs, and overall functionality are aligned with those of districts of comparable size and structure. The team will compare the district's special education staffing and organization with that of three to six similar sized districts using the Ed Data website, or six districts selected by the district. The report will include recommendations to improve staffing and organizational efficiency and effectiveness.
8. Review COE, NPS and NPA placements and make recommendations for improving the process for placement and cost efficiencies.
9. Review the costs of due process, mediations, and settlements for the past three years.
10. Review the revenues and allocations for Medi-Cal LEA and determine areas for greater efficiencies.
11. Determine the district's general education fund contribution to special education and make recommendations for greater efficiency.

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 San Juan Unified School District for their cooperation and assistance during fieldwork.

Sincerely

A handwritten signature in black ink, appearing to read "Joel D. Montero". The signature is fluid and cursive, with a large initial "J" and "M".

Joel D. Montero

Chief Executive Officer

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About FCMAT

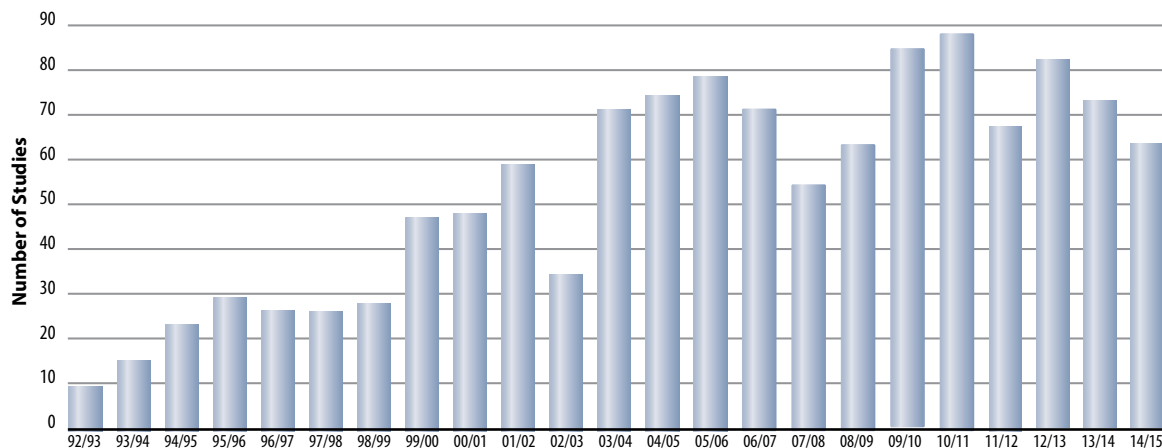
FCMAT's primary mission is to assist California's local K-14 educational agencies to identify, prevent, and resolve financial, human resources and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related 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). CSIS also hosts and maintains the Ed-Data website (www.ed-data.org) and provides technical expertise to the Ed-Data partnership: the California Department of Education, EdSource and FCMAT.

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 state-wide 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

The San Juan Unified School District serves a 75-square mile area covering the communities of Arden-Arcade, Carmichael, Citrus Heights, Fair Oaks, Gold River and Orangevale. The district includes 41 elementary schools, eight middle schools, 11 high schools, and four other alternative schools, which includes adult education, separate schools for moderate to severe special needs and adult transition special education programs for 18- to 22-year olds, as well as hosting 11 charter schools.

The district is the 11th largest in California, with an expenditure budget of more than \$387 million used to employ more than 5,000 individuals and educate more than 45,530 students in its early learning, TK-12 and adult programs. San Juan Unified is a single-district special education local plan area (SELPA) and is therefore responsible for writing and implementing its own local plan, policies, procedures and programs. The district employs more than 280 special education teachers and specialists and over 290 instructional assistants and classified staff. Special education programs and services are provided at each of its schools.

Study and Report Guidelines

FCMAT visited the district on May 24-26, 2016 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
- SST/RtI//MTSS
- Identification Rate
- Special Education Programs and Services
- Staffing and Caseloads
- Instructional Assistants
- Related Service Provider Caseloads
- Organizational Structure
- COE/NPS/NPA
- Due Process
- Medi-Cal LEA
- Fiscal Efficiencies
- 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:

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

Executive Summary

FCMAT reviewed the San Juan Unified School District's implementation of student success teams (SSTs), Response to Intervention (RtI), and Multi-Tiered System of Supports (MTSSs). The district is inconsistent in applying and using SST procedures. It has worked over the last year to establish an approach to MTSS in the elementary grades. Implementing a well-designed approach to MTSS is essential to improve student acquisition of skills and provide critically needed support to staff in addressing the needs of students with delays in acquiring skills.

The district overidentifies students for special education at a rate of 12.1%. The statewide average rate of special education identification is 10.1% based on the 2015 California Task Force Report on Special Education.

The district provides a variety of service options and programs that include full inclusion, a learning center, partial integration, self-contained classrooms, center schools, nonpublic schools and related services. Many district staff expressed concern that students who require an increase in services are placed in a self-contained program, and the students who are served more than half of the time in special education cannot access the general education program and integrate with typical peers.

The district average resource specialist caseload falls within the statutory requirement of 28. Staff report that 1-to-1 paraeducator staffing rolls over from year to year without an in-depth analysis of the need or the fiscal impact of continued support. Staff also report that the district has no transition or "fade" plan to ultimately attempt to reduce the number of 1-to-1 paraeducators.

The district was compared to the following similarly-sized unified districts that are also single-district SELPAs: Corona-Norco, Garden Grove, Poway, and Sacramento City. San Juan Unified is overstaffed with three principals for segregated sites compared to an average of .5; however, most of the other districts do not operate segregated special education sites. The average number of program specialists with administrative responsibilities/coordinators is six, while the district has 10.

The district has increased its Medi-Cal LEA billing by \$272,612 over the last three years, but FCMAT estimates that an additional reimbursement of \$500,000 to \$700,000 per year is available.

The total revenue increase maintenance-of-effort (MOE) documents indicate the district's general fund contribution was \$24,947,167 or 33% in 2013-14 and \$28,019,860 or 35% in 2014-15. The district's 2015-16 second interim expenditure budget for special education is \$86,704,517 based on the MOE document. The district's general fund contribution is projected to be \$33,686,938, which is 39% of the special education budget. According to the March 2015 Special Education Task Force Report on the general fund contribution percentage to special education, the statewide average is 43%.

Findings and Recommendations

SST/RTI/MTSS

Student Study Team – The San Juan Unified School District has a longstanding student study team (SST) process; however, interviews with staff clearly indicate that SST procedures are not consistently used throughout the district. Interviews across all segments of staff uniformly indicated that general education teachers who refer a student to SST frequently expect that the student will be assessed for special education services. Based on school site leadership and staff participation, only a few individual sites practice a viable SST process, and those sites appear to rely strongly on the involvement of special education in staffing the process. Virtually all staff interviewed stated the SST process clearly needs improvement. Interviews and a review of documents indicate that a lack of viable general education interventions for struggling students seriously compromise the effectiveness of the SST process. This ties the SST process to the absence of an effective Response to Intervention (RTI) or Multi-Tiered System of Support (MTSS) in the district. As discussed below, an effort to design and implement a viable MTSS in the elementary programs is under way. However, a review of the MTSS proposal that will be submitted to the governing board does not include plans for a revision of the SST process.

Response to Intervention and Multi-Tiered System of Support – A recent issue of “The Special EDge”, Winter 2015, Volume 29, No. 1, describes MTSS as “standards based instruction, interventions, mental health, and academic and behavioral supports aligned with accessible instruction and curriculum...” The Special EDge issue highlights that a MTSS approach can, “be used to develop and align resources, programs, supports, and services at all organizational levels to increase positive student outcomes.” The Report of California’s Statewide Task Force of Special Education, “One System: Reforming Education to Serve All Students”, March 2015, states, “A multitiered system of supports (MTSS) is a whole-school, data driven, prevention-based framework for improving learning outcomes for every student through a layered continuum (typically three tiers) of evidence-based practices that increases in intensity, focus, and target to a degree that is commensurate with the needs of the student.” The publication also states, “Operating at the student level, RTI is a part of MTSS and echoes the tenets of the MTSS structure.”

Interviews with staff indicate that the district previously began an effort to establish an RtI approach and procedures, but that effort was discontinued because of changes in senior administration and policy. The district has worked over the last year to establish an approach to MTSS in the elementary grades. The implementation of a well-designed approach to MTSS is essential to improve student acquisition of skills and provide critically needed support to staff in addressing the needs of students with delays in acquiring skills. As pointed out above, RtI and MTSS is consistent with the recommendations of the State Task Force on Special Education. The proposed MTSS model in this district is noteworthy for its design to address student need for support in both academic areas as well as social emotional areas.

Recommendations

The district should:

1. Ensure that a commitment to redesign the districtwide SST policy and procedures is a coordinated component of the MTSS plan to be implemented in the district. The redesign should include those affected in both general and special education at all levels of district operation.
2. Continue to work towards complete implementation of the proposed district plan for elementary MTSS/RtI2 procedures that includes the essential core structure of an effective MTSS/RtI2 as composed of fortifying the core, universal screening, research-based intervention, progress monitoring and data-based decision-making (“Special EDge”: Summer 2013).
3. Ensure implementation of the district’s proposed MTSS design including components that address student behavior as found in PBIS.
4. Develop a process to allow SST members and psychologists to use RtI as part of the decision-making process for referral to special education.

Identification Rate

The identification rate for the district's disabled students is 12.1%, which exceeds the statewide average of 10.1% based on the 2015 California Task Force Report on Special Education. Neither the district or task force report rates include infant and preschool students. If these areas were included, the rate of identification would increase to 13.04% for the district with a statewide average of 11.31%. For the purposes of annual tracking of special education identification rate and comparison to the state average, the calculation should exclude infant and preschool students. Interviews with district staff indicate the district has a significant concern about overidentification of special education students. The rate of identification reported in this study is not as high as the rate previously calculated by the district. FCMAT could not identify through staff interviews how the district's self-calculated rate was established. FCMAT consistently relies on the California Special Education Management Information System (CASEMIS) Data Report for its special education student summary data. The California Department of Education relies on CASEMIS to calculate a wide variety of critical student data. To accurately reflect the district's status as a single-district SELPA, the district-of-service CASEMIS data from December 1, 2015 was used, which shows all students receiving special education services provided by the district. FCMAT usually applies district-of-residence data in this calculation; however, in this instance, the lack of reliability in district-of-residence data and the aforementioned single-district SELPA status led to the application of CASEMIS district-of-service data. Since the district is a single-district SELPA, there is no significant difference between district-of-residence and district-of-service data. The total district population of 45,530 students was taken from California Longitudinal Pupil Achievement Data System (CALPADS) February 19, 2016 that includes all students in the district including those in charter schools. FCMAT recommends that these data sources be consistently used to calculate special education identification rate in the future.

FCMAT compared the district percentage of special education students by disability to the statewide average which is reflected in the chart below. The data indicates the areas of highest rate of identification are emotional disturbance and other health impairments. Those areas have strong connections with behavior disorders. This comparison reinforces the importance of the social emotional components contained in the district's proposed MTSS design. Through interviews, the district staff indicated that the lack of a comprehensive PBIS and the corresponding supports common to RtI and MTSS contribute to district overidentification of students.

Disability	District	County	State
Intellectually Disabled	6.3	6.4	6.1
Hard of Hearing	0.87	0.8	1.4
Deaf	0.78	0.4	0.5
Speech and Language Impaired	20.5	22.6	22.3
Vision Impaired	0.65	0.6	0.5
Emotionally disturbed	6.55	5.0	3.4
Orthopedically Impaired	1.47	1.2	1.7
Other Health Impaired	11.9	8.4	10.6
Specifically Learning Disabled	39.98	41.2	39.6
Deaf/Blind	0.0	0.0	0.0
Multiply Disabled	0.53	1.6	0.9
Autistic	11.4	11.4	12.6
Traumatic Brain Injured	0.27	0.2	0.2

Source: CASEMIS 12-1-2015 (District K-22), Kidsdata.org 2015 (County K-22 and State K-22)

Relevant to special identification rate, interviews with staff indicated that special education assessment staff are frequently under pressure from multiple levels of district staff to determine that students are eligible for special education support because of the absence of other viable academic and behavior interventions. Several special education service providers also indicated that they had difficulty convincing parents during IEP meetings that their students were ready to discontinue or “exit” services. Therefore, students were allowed to continue with limited services or on “consult” instead of being appropriately transferred. Some service providers felt that they did not receive sufficient administrative support when discussing the appropriateness of transfer during annual or triennial IEP meetings.

Recommendations

The district should:

1. Conduct an in-depth analysis of student identification starting from the initial consultation with parents to the SST process to the IEP referral process.
2. Ensure that legal eligibility criteria is consistently and appropriately applied in all eligibility decisions.
3. Ensure that students are transferred or “exited” when they no longer qualify for or would benefit from special education services utilizing the criteria in the handbook.
4. Provide staff with training on appropriately and efficiently using the exit criteria, guidelines and fading plan.
5. Evaluate the assessment and identification procedures for emotional disturbance and other health impairments to ensure it aligns closely to the statewide average identification rate in these areas and decreases identification.

Special Education Programs and Services

The district asked FCMAT to analyze whether it provides a continuum of special education and related services for students from preschool through age 22 and include an analysis of the least restrictive environments. The district does not provide the service delivery models at all sites, but it provides a continuum and describes its service delivery models as follows:

1. Fully Integrated Model – students with special needs receive instruction in the regular program where they receive special education support through collaboration between the classroom teachers and the service providers. This may include team-teaching or the support of an instructional assistant.
2. Learning Center/Tutorial Model – students receive instruction in the core curriculum, similar to the fully integrated model, with study skills practice in a learning center or a special education classroom staffed by special education teachers, support staff and instructional assistants.
3. Partial Integration Model – students receive most instruction in the special education class with integration into general education classes as appropriate for each individual student and they tend to be less extensive than in the full-integration models described above.
4. Contained Classes – students with significant delays and impairments, receive all instruction in the special education class and usually earn a Certificate of Completion at the end of their high school education. Depending upon the student's IEP, mainstreaming opportunities may be provided.
5. Center School – students receive instruction at Laurel Ruff, Ralph Richardson or La Vista Centers and are mainstreamed into nearby school/programs whenever possible.
6. State Special Schools and Non-Public Schools – a student may be enrolled outside the San Juan District, to receive services that they cannot be offered within the district.

Many district staff expressed concern that students who are requiring an increase in services, which results in a self-contained program serving more than 50% of the day in special education, are unable to access the general education program and integrate with typical peers. Staff reported that schools have high levels of segregation, and special education programs often operate in isolation. This occurs because students counted as SDC students cannot be counted in general education class, according to staff. As a result, other general education students take their place as an enrollment number in the general education classroom. This is of great concern, will contribute to future CDE findings, and does not allow equal access to special-needs students. Some staff reported they want to blend the resource program with the mild-moderate special day class program, which would allow for students to integrate more freely as well as including teachers in the day-to-day interactions with students and other staff.

The special education staff reportedly received professional development in the past, but it was discontinued, so some staff does not know the district's special education procedures and processes. Although the district has a procedure manual, staff do not receive regular updates. Regardless of student placement and services, all special education and general education teachers

should have the training, resources and knowledge to support the diverse population. General education staff indicated they would like professional development on differentiated learning and various strategies to use in the classroom with all learners. Staff additionally expressed that they need additional training and supports in behavior management.

Staff were inconsistent about whether students and teachers in the Special Education Department have equal access to districtwide technology, curriculum, assemblies and field-trip opportunities. Staff also indicated that students do not have equal access to student breakfasts because special-needs students use the district transportation system, which arrives at school too late for the students to access the breakfast program in the morning.

The CDE Special Education Annual Performance Report Measure of 2014-15 indicates that the percentage of all disabled students, by race or ethnicity who were suspended for more than 10 days in a school year should meet the statewide rate of 2.43%. The district did not meet that measure for African Americans with 5.19% and multiethnic students at 2.79%. In fact, all of the suspension rates increased from 2013-14 to 2014-15 except for those involving Asian and white students. Site administration reportedly received training in this area, but did not implement the recommendations to support student alternatives to suspension.

The district did not meet its special education target graduation rate of 69.25%, with only 62.31% of its students graduating. Staff reported that the district offers students a fifth year in high school to complete any courses they may need to graduate. Students frequently enroll for a fifth year and earn their diploma during that time, but the California Department of Education does not capture this data. The district should continue to offer a fifth year when appropriate.

The same report also indicates the average amount of time students age six through 22 receive special education or services apart from nondisabled peers in separate schools is less than 4.4%, yet San Juan is over the requirement at 7%. Three district campuses separate from comprehensive campuses. Ralph Richardson campus serves the more intensive medically fragile population and includes supports with a full-time administrator. This campus is located on the same property as a comprehensive K-8 campus Starr King; however, it is considered as separate. Students who attend Ralph Richardson can mainstream into Starr King classes. The district should consider merging the two campuses to assist with the least restrictive environment (LRE) reporting. Staff reported the Ralph Richardson Center is a “namesake” and it could remain, but the center can operate within the Starr King campus. This will also promote a culture of unity for students and parents.

The district supports students ages 18 to 22 through a transition community-based program, the Laurel Ruff Center. The students are supported through the local community college, American River, as well as within the community for community-based instruction. The students who are 18 to 22 years old are served in their LRE through these college experiences and community programs; however, the district does not report the students as receiving their services through LRE. The district should review its reporting procedures and document student’s services on the IEP. The third separate program is La Vista Center and serves emotionally-disturbed students. Although students are on a separate campus, the population is served through a less restrictive environment than a nonpublic school, where many of the students were served or could have been placed. Additionally, students are integrated into their local school campus when the IEP team determines this is appropriate. Restructuring and developing consistent data input within the IEP process and the information system should allow the district to meet the LRE for the annual indicators under separate school.

Recommendations

The district should:

1. Review the option to blend resource and special day class mild/moderate programs.
2. Determine how to keep seat space in the general education classrooms so students with IEPs can have equal access to the least restrictive environment.
3. Provide the procedural handbook and its updates to all staff.
4. Develop a professional development plan to support staff in the following areas:
 - a. Procedures and processes in special education
 - b. Accommodations and modifications in the classroom
 - c. Differentiated instruction
 - d. Behavior modifications and supports
 - e. Supporting the unique learner
5. Provide equal access to curriculum, technology and extracurricular activities including assemblies and field trips.
6. Implement comprehensive positive behavior systems districtwide as an alternative to suspensions.
7. Review students who do not have school breakfasts and determine an alternative to allow equal access.
8. Provide training to special education teachers on how they could document students who are age 18 to 22 receiving LRE in their community and at the community college.

Staffing and Caseloads

The district maintains caseloads and class sizes of all teachers, including lists by school site, teacher type, teacher name, and the number of students each teacher is responsible for case managing. The position control document lists instructional assistants by name, job title, and number of hours worked, but does not include the name of the teacher or the classroom by disability to which the aide is assigned. Consequently, calculations of ratios must be done manually comparing the two separate documents.

Statutory requirements on caseload size cover only resource specialist (RSP) services, and Education Code 56362c establishes that caseload maximum at 28. The statute includes nothing on special day classes (SDCs); however, the district collective bargaining contract has provisions for SDC size, and statewide industry standards can be used for comparison.

For RSP, the district average caseload falls within the 28 statutory requirement, but a problem arises when individual caseloads are reviewed. According to district-provided data, approximately 20% of the individual caseloads are more than 28, which should necessitate a CDE waiver. However, more than half of those are more than 32, which is the maximum number for which a waiver could be granted. Although some staff report that the caseloads are closely monitored, the data provided on the sheets is sometimes inaccurate. Moreover, when caseloads surpass the cap of 28, students are moved to another staff member's caseload; therefore, no waivers have been submitted to CDE.

In addition to resource specialists, the district operates inclusion specialist programs. The inclusion specialists work with students who are fully included in the general education mainstream. The district tries to maintain inclusion caseloads at 17; however, data indicates an average caseload of 19.9. The caseloads for both programs are depicted in the table below.

Caseloads of RSP/Inclusion Specialists

RSP/Inclusion Caseloads	Total Teacher FTE	Total Students	Ratio	Education Code and Industry Standards Ratios
Resource Specialists	82.3	2259	1:27.4	Caseloads not to exceed 1:28 (Ed Code 56362c)
Inclusion Specialists	6.8	135	1:19.9	Caseloads not to exceed 1:28 (Industry Standards)

Source: District provided data

The district contract also provides caseload sizes that cannot be exceeded in both caseload average and some individual disabilities. The average class size for mild moderate SDC programs should not exceed 12 students, and the size for any individual class is not to be more than 17. While the district contract average falls within the industry standard, the specific class size does not. The average of all mild moderate classes in the district surpasses both the contract provision and the industry standard.

Caseloads of Mild to Moderate Classes

Mild Moderate Caseloads	Total Teacher FTE	Total Students	Ratio	Industry Standards
Elem	25	369	1:14.8	Caseloads not to exceed 12-15
Intermediate	10	227	1:22.7	Caseloads not to exceed 12-15
Secondary	12.5	302	1:24.2	Caseloads not to exceed 12-15
Total/Average	47.5	898	1:18.9	Caseloads not to exceed 12-15

Source: District provided data

The contract also has provisions on the caseloads of moderate to severe SDCs. The average class size in the district SDC program should not exceed 12 students, and the size of individual classes should not be more than 17. Classes for the hearing impaired, preschool students, the emotionally disturbed (ED), and center classes are exceptions and cannot exceed an average of 10. Individual class size should not exceed 14.

Average caseloads exceed industry standards in every category. In some categories, such as deaf/hard of hearing, preschool, and ED, the average class size exceeds the contract language of 10 as well as the industry standard. Moreover, preschool and ED individual class sizes sometimes were more than 14. The tables below depict class ratios for all moderate to severe classes.

Caseloads of Moderate to Severe Classes

Moderate to Severe Pre-K Caseloads	Total Teacher FTE	Total Students	Total Ratio	Industry Standards(FTE to Student Caseload)
	13	191	1:14.7	1-to-10-12

Source: District provided data

Moderate to Severe Caseloads—Elementary-Transition	Total Teacher FTE	Total Students	Ratio	Industry Standards (FTE to Student Caseload)
Elem	4	46	1:11.5	Caseloads not to exceed 10-12
Middle	8	116	1:14.5	Caseloads not to exceed 10-12
Secondary	10	170	1:17.0	Caseloads not to exceed 10-12
Transition	9	116	1: 12.9	Caseloads not to exceed 10-12
Center	6	60	1:10.0	Caseloads not to exceed 10-12
Total	37	508	1:13.7	Caseloads not to exceed 10-12

Source: District provided data

ED Caseloads	Total Teacher FTE	Total Students	Ratio	Industry Standards (FTE to Student Caseload)
Elementary	8	101	1:12.6	Caseloads not to exceed 8-10
Intermediate	5	72	1:14.4	Caseloads not to exceed 8-10
Secondary	17	192	1:11.3	Caseloads not to exceed 8-10
Center	1	9	1:9.0	Caseloads not to exceed 8-10
Total	31	374	1: 12:1	Caseloads not to exceed 8-10

Source: District provided data

Deaf Hard/Hearing Caseloads	Total Teacher FTE	Total Students	Total Ratio	Industry Standards(FTE to Student Caseload)
Infant & Pre-School	2	22	1:11.0	Caseloads not to exceed 8-10
Elementary	2	27	1:13.5	Caseloads not to exceed 8-10
Middle	1	7	1:7.0	Caseloads not to exceed 8-10
Secondary	1	10	1:10.0	Caseloads not to exceed 8-10
Total	6	66	1:11.0	Caseloads not to exceed 8-10

Source: District provided data

Autism Caseloads—Elementary-High School	Total Teacher FTE	Total Students	Ratio	Industry Standards (FTE to Student Caseload)
Elem	9	104	1:11.6	Caseloads not to exceed 8-10
Middle	1	14	1:14.0	Caseloads not to exceed 8-10
Secondary	0	0	0	Caseloads not to exceed 8-10
Center	4	35	1: 8.8	Caseloads not to exceed 8-10
Total	14	153	1:10.9	Caseloads not to exceed 8-10

Source: District provided data

Staff report that when class sizes are exceeded, students are moved to another service provider's caseload, where a paraeducator may provide instruction. However, a paraeducator's purpose is only to provide follow-up instruction, not initial instruction of concepts. These personnel should not assume primary instructional responsibility for the students who have been moved from one case manager to another.

The district does not have a formalized and/or consistent process to add or reduce classes. Staff report that proposals simply are submitted to cabinet without consistently providing the budgetary ramifications to Human Resources or Business. In addition, joint staff meetings between fiscal, personnel, and Special Education Department staff are not consistently held throughout the year. When proposals for additional staff are submitted to the cabinet, they do not include specifics such as an analysis of overfunding or underfunding of total staff as a result of such an addition. Instead, the proposals include only the purpose and justification of the requested additional staff member(s).

Staff expressed concerns about large teacher caseloads and lack of support from administrative personnel. The contract stipulates that teachers are to receive extra compensation when their class size surpasses the contract cap. Staff reported that this contract provision is not always followed.

Recommendations

The district should:

1. Obtain an electronic system that allows for easy tracking of class sizes and caseloads by disability category.
2. Continue a quarterly evaluation schedule in which caseloads and class size ratios are reviewed and provided to the supervisors of the Human Resources and Business departments.
3. Continue to monitor caseloads to ensure they remain within contract language provisions and industry standards.
4. Provide follow-up to make sure that teachers receive additional compensation for class sizes surpassing contract language to prevent grievances.
5. Schedule periodic staff meetings with certificated representatives of various disability groups to discuss staff concerns and brainstorm solutions to current and potential problems.

Instructional Assistants

The district lacks a process to easily determine the staffing allocation of paraeducators. The position control sheet lists the paraeducators by name and job title, with the number of hours worked per day as well as the site where they are assigned. However, the teacher to which they are assigned is not listed; therefore, attempting to calculate the actual staffing allocation of paraprofessionals throughout the district by disability involves a great deal of manual calculation using documents that are inconsistent. The data system does not allow the sorting of the number of aides assigned to each category (SH vs non-SH) or subcategories such as autism, preschool, or ED. Staff provided the information by indicating for each staff member the disability category of the class where the paraeducator was assigned.

The district does not have a formalized process and/or procedures for identifying the need for paraeducators or monitoring the resources for allocating them. It had a special circumstance instructional aide (SCIA) process at one time, but it was discontinued because staff believed that the form was too time consuming to complete. The Special Education Department management staff determines the need for additional paraeducators or 1-to-1 paraeducators without ongoing coordination and communication with the Business and/or Human Relations staff. Requests for these positions are simply submitted to the director's supervisor for approval.

Staff report that 1-to-1 paraeducators continue their assignments from year to year without an in-depth analysis of the need for continued support or its fiscal impact. Staff also report that the district lacks a transition or "fade plan," based on collected classroom data, to reduce the number of 1-to-1 paraeducators. The number of 1-to-1 paraeducators reflects approximately 253.5 hours per day (42.3 FTEs) of unfunded aide time amounting to an approximate expenditure of \$1,931,683 as shown in the chart below.

1:1 Unfunded Aide Hours

I:I Aides	Hours Worked Per Day	FTE's	Unfunded Expenditures
Non-SH I:I Aides	85	14.2	\$654,847
SH I:I Aides	168.50	28.1	\$1,276,836
Total	253.5	42.3	\$1,931,683

Source: District provided data

The district has developed a guideline titled, Special Education Practices for Staffing Instructional Assistants. The document lists the number of suggested hours per week for the classrooms based on the grade level and type of classroom, e.g., resource, mild-moderate, moderate to severe, ED, inclusion, and autism. Data provided by staff indicates that the district operates a large number of unfunded aide hours beyond the industry standards of six hours for each non-SH class and 12 hours for each SH classroom. The table below depicts the assignment of aide time to specific classes, a comparison to industry standards for both non-SH and SH programs, and the number of FTEs operated above and below industry standards. The amount of expenditures for excess aide time (\$5,457,363) is also provided broken down into categories. When combined with the unfunded 1-to-1 aide time of \$1,931,683, the district spends a total of \$7,389,046 on aide hours above and beyond industry standards.

Industry Standards for Caseloads and Allocated Aide Hours

	FTE	Caseload	District Caseload Average/FTE	Industry Standards Average:students/ FTE	Industry Standards Average: aide hours/FTE
Mild-Moderate Resource Specialists	82.3	2259	27.5	28	6
Inclusion Specialists	6.8	135	19.9	28	6
Mild-Moderate SDCs	47.5	898	18.9	12-15	6
Moderate-Severe SDCs Including Transition	37	508	13.7	10-12	12
Moderate-Severe—ED	31	374	12.1	8-10	12
Moderate-Severe—Deaf/ Hard of Hearing	6	66	11	8-10	12
Moderate-Severe—Autism Not Incl Pre-K	14	153	10.9	8-10	12
Moderate-Severe—Pre-K	13	191	14.7	10-12	12

Allocated vs Operated Aide Hours

	Industry Standards hours total allowed	Aide Hours Operated	Total hours over/under guidelines	Total FTE (6 hours) Over/under	
Mild- Moderate Resource Specialists	493.8	349.0	-144.8	-24.1	
Inclusion Specialists	40.8	172.3	+131.5	+21.9	\$1,009,940
Mild-Moderate SDCs	285	476.8	+ 191.8	+32	\$1,475,712
Moderate-Severe Including Transition	444	564.8	+120.8	+20.1	\$ 913,324
Moderate-Severe ED	372	388.75	+16.75	+2.8	\$127,229
Moderate-Severe Deaf/Hard of Hearing	72	36.9	-35.1	-5.9	
Moderate-Severe Autism Not Incl Pre-School Or Inclusion	168	410	+242	+40.3	\$1,831,192
Moderate-Severe Pre-K	156	169	+13	+2.2	\$99,966
Total					\$5,457,363

Source: District provided data

Staff report that paraeducators often volunteer time, arriving earlier or staying later than their contract stipulates. This puts the district at risk of having to pay them extra salary if the overage is documented for more than 20 consecutive days. Staff also report that certificated staff and their instructional assistants need additional in-service training. Workshops are often repeated from year to year, and staff are interested in a greater variety of staff development training. Staff members are also told that if they choose not to attend the workshop, they must utilize a vacation day.

Instructional assistants are sometimes left alone in the classroom when a certificated staff member is absent either because of illness or attending an IEP meeting. Substitutes are often not available to provide necessary coverage for absent classified and/or certificated instructional personnel.

Recommendations

The district should:

1. Develop a coordinated tracking system that contains on one sheet all the information necessary to track certificated teacher, assigned classroom paraeducators and 1-to-1 aides by disability categories, hours worked and FTEs assigned to each class.
2. Schedule ongoing meetings to facilitate communication between Special Education, Human Resources, and Business so that the departments have a clear understanding of the fiscal impact of adding additional staff members to the special education operation.
3. Develop a SCIA process and fade plan in an attempt to bring the amount of allocated vs. operated aide hours closer together and develop more independence for the students assigned 1-to-1 paraeducators.
4. When the IEP team determines the need for 1-1 instructional assistance or full-time instructional support, ensure IEP also contains an individual annual fade plan for the student to decrease and eventually eliminate the need for these services.
5. Conduct further staff development training in the use of the SCIA process, procedures, and forms and monitor its utilization.
6. Annually analyze whether each of the 1-to-1 aides should be continued the following year by completing the SCIA process to avoid overstaffing.
7. Make certificated and classified staff aware of the importance of classified staff working only assigned hours.
8. Conduct an annual staff development survey to determine interests and develop a variety of in-service opportunities.
9. Analyze the district guidelines for staffing instructional assistants to determine how they compare to actual staffing patterns and industry standards.

Related Service Provider (also known as Designated Instruction Provider) Caseloads

Speech and Language Pathologists

The district documentation provided to FCMAT for speech and language pathologist (SLP) staffing and identified student caseloads was inconsistent and difficult to verify. Some staffing documents included charter school speech pathologists, and others did not. The totals for speech and language pathologist FTEs ranged from 73.9 to 43. The total number of students identified under speech and language impairment (SLI) ranged from 2,676 to 1,341. Accordingly, the average caseload for a K-12 SLP ranged from 60.2 to 27.6. FCMAT ultimately determined it could only rely on full-time equivalent documentation from the district-provided position control records. Because a CASEMIS-generated student count for duplicated speech and language service was unavailable, FCMAT used the district-provided final figure for total speech services of 2,676. Consolidation and consistency in tracking employee staffing and caseload assignments is essential to effective staffing projections and planning.

Based on district-provided position control, the district employs 45.8 FTE speech and language pathologists. This level of staffing represents a total average cost of \$4,421,624 including salary and benefits. The district also employs speech and language pathology assistants (SLPA) to support the speech pathologists. The American Speech-Language Hearing Association (ASHA) defines an SLPA as follows:

Speech-language pathology assistants are support personnel who, following academic coursework, fieldwork, and on-the-job training, perform tasks prescribed, directed, and supervised by ASHA-certified speech-language pathologists.

A district SLPA receives an average of \$65,864 in salary and benefits, and the district employs 7.35 FTE SLPAs at an average cost of \$484,100 per year.

The assignment of speech pathologists was reviewed from the perspective of differentiating preschool speech caseloads from grades K-12 speech caseloads. The Education Code establishes a maximum caseload of 40 students for preschool (Education Code 56441.7(a)) and 55 students for K-12 (Education Code 56363.3). Establishing accurate caseload averages in speech and language services involves considering a number of factors, including separating preschool and K-12 services and settings. FCMAT consultants used all data made available to calculate caseload averages for speech language pathologists. As represented in the table below, the district has 41 FTE speech pathologists serving the K-12 population and 4.8 FTE serving the preschool population (not including charter school staffing). If the district were to staff preschool speech services at an average of 40 students, it would require 5.2 FTE speech pathologists. That would indicate the district is understaffed at the preschool level by 0.4 FTE, representing a potential cost of \$38,617.

Based on the data provided by the district from position control, 41 FTE speech pathologists serve grades K-12. The K-12 certificated staffing was compared to the district-provided figure of 2,676 total speech and language students. This figure minus the 209 preschool speech students reflects a total K-12 speech and language student service count of 2,467. This data analysis shows that the average SLP caseload for the K-12 population is 60.2. According to the Education Code, the maximum speech and language caseload is 55 students. If caseloads were maximized at an average of 55, the district would require 44.85 FTE in the K-12 grades. The analysis based on

this data suggests that K-12 SLPs are understaffed by 3.85 FTE, representing a potential cost of \$371,687. This caseload data is reported in the table below. Due to the internal inconsistencies of caseload data provided for speech and language services, this study does not include recommendations on specific adjustments in certificated speech and language staffing.

The trend among California districts is using SLPA's to offset the shortage of SLPs. In those circumstances, an SLP will supervise one or more SLPA's who provide service to students within the SLPA scope of practice. This district utilizes SLPA employees and SLPs contracted from nonpublic agencies. The district employs 7.5 FTE SLPA's and uses approximately nine privately contracted SLPs (additional information is included in the nonpublic agency services section of this report). In many districts across the state, an SLP who needs support with his or her caseload receives assistance from a paraprofessional who is trained by the SLP. In "Defining Speech-Language Pathology Assistants," the ASHA indicates that there are typically two levels of support personnel for the SLP: assistants and aides. Aides may be referred to as communication aides, paraprofessionals, or service extenders. (American Speech-Language Hearing Association Website, "Frequently Asked Questions: Speech – Language Pathology Assistants (SLPA's)").

Speech and Language Pathologist Comparison

Provider	District Total SLP FTE to Total Caseload	District Average Caseload Ratio	Ed Code Maximum FTE to Caseload Ratio
Speech Language Pathologist Ratio	41 to 2467	1 to 60.2	1 to 55
Speech Language Pathologist Ratio Preschool	4.8 to 209	1 to 43.5	1 to 40

Education Code 56441.7(a) 56363.3 and district data

Recommendations

The district should:

1. Define and track preschool and K-12 speech services in a clear manner that provides accurate caseload comparisons and a comprehensible decision-making system for monitoring caseloads.
2. Regularly review the caseload distribution for speech pathologists in preschool and K-12 to determine reasonable equity between service providers and make informed decisions on assignments and the allocation of support.
3. Examine the function of the SLPA support to determine if the number of these positions can be reduced or eliminated.
4. Consider using instructional assistants trained for support in speech therapy rather than SLPA's when it is determined that speech pathologists require additional support.

School Psychologists

The district employs 30.1 FTE school psychologists based on position control staffing summaries. Comprehensive Early Intervening Support (CEIS) funds 4.0 FTE school psychologists to address a California Department of Education identified disproportionality issue. The CEIS positions are actually split, with psychologists spending half their time performing traditional psychologist duties and the other half addressing general education student issues that may contribute to the identified area of disproportionality. Approximately 1.9 FTE school psychologist is assigned to preschool support. Most psychologists are assigned to multiple school sites and support the students and programs located at their site(s). They perform the duties common to school psychologists, which consist primarily of initial assessments for special education eligibility, report writing, participation in IEP team meetings and triennial evaluations.

The FCMAT comparison for psychologist staffing is based on the school psychologist FTE in K-12 assignments. Because there is no statewide comparison for school psychology staffing in the infant/preschool setting, both the 1.9 FTE preschool psychologists and the FTE of CEIS psychologists are removed from the K-12 comparison. The average caseload for school psychologist, K-12 is calculated on 24.2 FTE. FCMAT uses two different sources for comparison of school psychology staffing. Both sources are based on California data since national averages or recommendations vary too widely to be of statistical significance because of differences of state funding that is contributed to federal funding for special education. Kidsdata identified a statewide caseload average of 1,321 for K-12 school psychologists and CalEdFacts had an average of 1,235 (see table below). The district is understaffed by 10.3 FTE school psychologists compared to Kidsdata and by 12.7 FTE according to CalEdFacts. The district average cost of school psychologist including salary and benefits is \$130,186. Therefore an addition of 10.3 FTE represents an annual cost of \$1,340,916 and an addition of 12.7 FTE represents a cost of \$1,653,362.

School Psychologist Comparison

Program (K-12)	No. of FTE	Total Caseload	Kidsdata for students per class	District Caseload Average
Psychologist	24.2	45,530	1-to-1321	1-to-1881

Source: Kidsdata and district data

Program (K-12)	No. of FTE	Total Caseload	CalEdFacts for students per class	District Caseload Average
Psychologist	24.2	45,530	1-to-1235	1-to-1881

Source: CalEdFacts and district data

Recommendation

The district should:

1. Consider reducing the average caseload of K-12 school psychologists by adding staff.
2. Consider reducing the school psychologist assessment responsibility by developing an effective RtI-based determination of special education eligibility.

Occupational Therapists

The district employs 8 FTE occupational therapists (OTs) who serve a total caseload of 510 students. This caseload contains 170 students or 33% who are served on a consult basis. The industry standard for OT student caseload is one OT to 45-55 students. The district average including students on consultation is 1-to-63.75. The district also employs 2.8 FTE certified occupational therapists assistants (COTAs) at a total cost of \$242,791. The district caseloads for occupational therapists exceeds the industry standard of 55 and would require an additional 1.27 meet that standard. The additional staffing would represent an average cost of \$163,709. The provision 2.8 FTE of COTA support helps offset the high caseloads. Districts across the state typically employ COTAs to help support high caseloads that exceed the industry standard.

Occupational Therapists Caseload Comparison

Provider	No. of FTE	Total Caseload	District OT FTE-Student Ratio	COTA	Industry Standard (OT FTE – Student Ratio)
Occupational Therapists	8	510	1:63.75	2.8	1:45-55

Recommendations

The district should:

1. Examine the role and support provided by the COTAs to determine if additional OT staffing is warranted and cost effective.
2. Review eligibility standards with OT providers and referring staff to ensure staff are familiar with the scope and purpose of OT services.
3. Provide professional development in OT service generalization for case managers and classroom teachers who support OT services to their students.

Adaptive Physical Education Teachers

The district employs 14.10 FTE adaptive physical education (APE) teachers serving a caseload of 793 students districtwide, including preschool. Virtually all APE students receive direct instruction. The APE teachers provide push-in service when possible at the school sites where well-defined physical education programs are operated. The industry standard for APE caseloads is 1-to-45 to 55. The district average is 1-to-56.24.

Adaptive Physical Education Caseload Comparison

Provider	No. of FTE	Total Caseload	District APE FTE-Student Ratio	Industry Standard (APE FTE – Student Ratio)
Adaptive Physical Education Teachers	14.10	793	1:56.24	1:45-55

Source: Industry Standard and district data

Recommendation

The district should:

1. Review eligibility standards with APE providers and referring staff to ensure staff are familiar with the scope and purpose of APE services.

School Nurse

Based on the district provided document titled “2016-17 Average Salaries,” dated March 5, 2016, the district employs 19.55 FTE school nurses. The district also employs 27 licensed vocational nurses (LVNs), representing a total of 19 FTE based on position control data, who carry the job title, “Instructional Assistant, Health.” The district also employs six health clerks. LVNs must be supervised and trained by a school nurse, but they can perform significantly more health-related duties than a health clerks. Based on interviews with staff, each district school has an instructional assistant, health or a health clerk assigned for the school day. School nurses are assigned to schools throughout the district and oversee health-related duties for each school site. They provide supervision and training to the LVNs and health clerks as needed. The industry standard ratio for school nurse caseloads is 1-to-2,784 based on current statistics from Kidsdata. The district is staffed at an average school nurse caseload ratio of 1-to-2,329. If the district nursing services were staffed at the industry standard of 1-to-2,784, it would require 16.35 FTE school nurses. Interviews with staff indicate that communication between health service providers and special education staff is inconsistent regarding notification of the health component for initial and triennial assessments and IEP meeting notification. A cross-section of support service providers expressed similar concerns.

School Nurse Caseload Comparison

Provider	No. of FTE	Total Caseload	District Nurse FTE-Student Ratio	LVN FTE	Industry Standard (Nurse FTE – Student Ratio)
School Nurse	19.55	45,530	1:2329	19	1:2784

Source: Kidsdata and district data

Recommendation

The district should:

1. Review the allocation of school nurses and the assignment of LVNs to determine efficiency in the delivery of health services to students and staff in accordance with federal and state health mandates.
2. Review procedures for notification of all support staff regarding notification of participation in assessments and IEP meetings.

Other Support Staff

The district has four behavior specialists who work directly with special education. These positions help develop functional behavior assessments and assist in developing and implementing behavior support plans as well as providing direct support to special day classes for autistic students.

Two behavior specialists are funded through and provide support for the Comprehensive Early Intervening Support (CEIS) requirement. No industry standard has been established for behavior specialists' caseload ratio. The district also employs a full-time assistive technology specialist and an assistive technology assistant. The assistive technology specialist provides assessment and training, and both positions track and service assistive technology equipment. There is no industry standard for assistive technology specialist caseload ratio. Given the scope of assistive technology equipment assigned to students and classrooms, a more effective system for tracking equipment throughout the district would improve efficiency for all involved. The district employs 11 FTE mental health therapists to provide educationally related mental health service (ERMHS). Interviews with staff indicate that two mental health therapists are assigned full-time to the La Vista Center for students with emotional disturbance, and those remaining are assigned to schools throughout the district based on need. There is no industry standard for mental health therapists' caseload ratio. Interviews with staff indicated the general education staff and special education staff have little understanding of the basis for a student to receive ERMHS specific services through the IEP process. Professional development to clarify the difference between ERMHS provided services and other mental health and behavior support would be warranted.

Recommendations

The district should:

1. Establish a tracking system for allocation of assistive technology equipment.
2. Provide all district staff with professional development in mental health eligibility and services.

Organizational Structure

The district was compared to comparably sized unified districts that are single-district SELPAs. Those districts are Corona-Norco, Garden Grove, Poway and Sacramento City.

District	Enrollment	Special Education	English Language	Free and Reduced
Garden Grove	46177	5361	42.3%	75%
Sacramento City	46868	6283	21%	64%
Corona Norco	53,739	6397	13.5%	45%
Poway*	36,000	3977	11.6%	16%
San Juan	49,564	5882	11.2%	50%

**Requested by the district as Poway is frequently used by San Juan for benchmarking*

The district is staffed at the appropriate level consistent with other districts with a SELPA director and two program managers. The district is overstaffed with three principals for segregated sites with small enrollments compared to an average of .5; however, most of the other districts do not operate segregated special education sites. Districts vary considerably regarding the use of program specialists as administrators. The average number of program specialists with administrative responsibilities/coordinators is 5.75, while the district has 10. The other districts have an average of 5 specialists that are not on the administrative scale and do not have administrative duties.

Organizational Structure	San Juan	Corona Norco	Garden Grove	Poway	Sacramento City	Avg
SELPA Director	1	1	1	1	1	1
Director Program Manager	2	1	2	1	4	2
Principal	3		2			.5
Program Specialist/Coordinator(Admin)	10	0	13	1	9	5.75
Program Specialist/TOSA(Nonadmin)		12	0	10	3	6.25

Staff expressed a number of concerns about communication in the Special Education Department. The teachers indicated that the special education administration's message and guidance are inconsistent and vary between administrators and program specialists. Although time is dedicated to monthly meetings (four hours for managers and two hours for program specialists), the staff stated these meetings are not productive, and closure is not always reached. This can affect the consistency of the district's message coming through program specialists and others.

The staff reported that no one takes notes at meetings, and action plans are not developed with timelines and responsible parties listed. In the following month's meeting, there is no follow up or report on items discussed in the previous meeting. Meeting norms have been developed, but are not always followed by participants and administrators, especially prohibitions against side conversations and texting during the meeting.

Recommendations

The district should:

1. Evaluate the effectiveness of full-time administrative resources at the segregated sites.
2. Maintain two program managers and one SELPA director.
3. Analyze program duties for program specialists and determine if alignment with other districts of comparable size is efficient for the district.
4. Increase productivity in monthly meetings by reestablishing meeting norms and ensure that all participants abide by them.
5. Establish roles in the department meetings that include facilitator, time-keeper, note taker and norms keeper. Rotate duties monthly.
6. Develop a written agenda for the meeting
7. Create a document that lists agenda items, discussion points, conclusions and action items with a designated staff person responsible.
8. Change the format of the meetings to start with a report out on action items from the last meeting; a discussion on problem cases, upcoming projects, a report from the director.

COE/NPS/NPA

The working relationship between the fiscal business management responsibility of the NPS/NPA contracts supervised by the Special Education Department and the Business Department is fragmented. The district has limited its use of county office placements, but processes are missing and should be defined interdepartmentally.

The process for developing individual service agreements for NPAs/NPSs lacks sufficient control for approval. The individual service agreement (ISA) is initiated by the fiscal business staff and approved via an auto signature and moved forward to purchasing without any formal protocol for review by certificated special education administration. This process involves a review of the IEP to capture all of the related services outlined there. The district should develop a system of internal control in which the director reviews and approves all ISAs before the purchase orders are forwarded to the business office.

The NPS/NPA budget does not accurately reflect the costs of services. For example, the budget for Maxim Healthcare was \$80,000 for 2015-16, and expenditures are \$221,543. The Special Education Department does not adjust ISAs in NPAs to include contract changes for individual students.

The district should have a function code in the account structure for services used in nonpublic agencies. For example, nurses should be coded to 3140 and speech therapists to 3150.

The department should develop an annual budget that includes the actual costs projected for the following year rather than simply rolling over the budget. There is no internal process for reviewing the costs for the projected year in both categories. Program transfers are made from this account without clear protocols. There is no internal process for canceling contracts when students move or return to the district. The department must create and implement a protocol to cancel ISAs when they are closed out.

Recommendations

The district should:

1. Develop internal controls over NPA and NPS contracts that include approval by the director of special education and director of business services.
2. Ensure that certificated staff review IEPs, and feedback is provided to the fiscal technician regarding the ISA development.
3. Ensure program managers sign off on the ISA before seeking approval from the director of special education.
4. Review all NPA and NPS contracts, determine accuracy and make adjustments before the start of the school year.
5. Ensure that the director of special education monitors all expenditures in NPAs monthly.
6. Develop a process to notify the NPA when contracts are cancelled because of changes in services provisions through an IEP and/or student relocation to another district.

7. Ensure the Business Department receives copies of the written notification to NPAs.
8. Work closely with the Business Department to provide clear parameters for budget transfers.

Due Process

The average fees for settlement costs in the past three years is \$192,584. Settlement costs include reimbursements for services or projected costs for services, which is a standard practice in due process mediations.

The district does not track attorney fees for district representation in due process. A record of these fees should be included in due process costs for accurate documentation of costs.

The district has received an alternative dispute resolution (ADR) grant for \$20,000 from the California Department of Education to support training for staff in the facilitated IEP process. This process is designed to help all IEP team members focus on student needs and on developing a mutually acceptable IEP. It is designed to reduce conflict and disagreements in the IEP process.

Settlements	2013-14	2014-15	2015-16	3 year average
Parent Legal Fees and Settlement Costs	222,112	144,156	211,484	192,584
District Legal	N/A	N/A	N/A	N/A

Recommendations

The district should:

1. Track attorney fees charged to represent the district in due process and maintain a record of these costs along with legal fees by special education.
2. Consider including some parents as facilitators in conflict resolution.

Medi-Cal LEA

The district is a qualified local educational agency (LEA) and is eligible to participate as a service provider under the state Medicaid program (Medi-Cal) authorized under California's Welfare and Institutions Code §14132.06. The mutual objective of the California Department of Health Care Services (DHCS), the California Department of Education (CDE), and the LEA are to improve access to needed services for children. Eligible LEAs provide many reimbursable services as part of the federal and state mandate of providing special education, and these services are reimbursable under the state Medicaid program. Therefore, all eligible LEAs should submit for reimbursement to supplement district-provided services. San Juan Unified contracts with Paradigm Medical Billing to submit for qualified Medi-Cal-covered service reimbursement. The Paradigm Medical Billing representative annually meets with the district Medi-Cal facilitator and trains qualified service providers on the reimbursement process. The district is eligible to bill for services of students who qualify for medically related therapy under Medi-Cal LEA. Receiving funds through the California Department of Health Care Services includes several requirements. One of the critical requirements is to develop a collaborative partnership consortium with standing members that include a community partner or parent. The district committee does not include this membership. The committee is also required to discuss revenues and expenses in detail. Although discussions occur on revenues and expenditures, they are vague on how the monies will be expended besides the general understanding that special education will receive 70% of revenues. The consortium should be provided more accountability and specificity.

The district has increased its Medi-Cal LEA billing by \$272,612 over the last three years; however, the district still does not claim all the funding to which it is entitled. The chart below demonstrates revenues and the positions contributing to the revenues over a three-year span.

Position	2013-14	2014-15	2015-16
Nurses	166319	229665	254289
OT	30987	30209	37381
PT	0	0	0
Psych	217918	277805	295238
Mental Health	10416	5856	2919
SLP	383026	426764	546033
Trans	112043	92532	60538

Five years ago, the district began hiring OTs instead of contracting for services to serve its students. The district knew for several years that it could implement a contract with a physician to authorize educationally related occupational therapy for staff to bill for services according to a student's IEP. Approximately 510 district students receive OT services. Since OTs can bill for initial and triennial assessments, attendance at IEP meetings, and therapy services, the district could generate a minimum of approximately \$400,000 more annually. Three mental health therapists are authorized to bill Medi-Cal; however, they do not bill for counseling services. Psychologists are also authorized, but do not consistently do so. FCMAT was unable to receive documents to determine the potential revenue for mental health. Psychologists are authorized to bill for all assessments, including manifestation determination reviews, but some were unaware of this and therefore did not bill for the reviews. The physical therapists who provide contracted

services for approximately 67 students do not bill Medi-Cal for revenues that could be at least \$55,650. The total revenue increase is estimated at an additional \$500,000 to \$700,000 per year.

Recommendations

The district should:

1. Include a community member or parent as a standing member of the collaborative partnership consortium.
2. Consider placing the lead coordination and oversight of Medi-Cal LEA under the Special Education Department.
3. Consider contracting with a physician to authorize OT treatments.
4. Track and verify maximum mental health counseling services are billed.
5. Track and verify all assessments are billed to include manifestation determination reviews.
6. Work with the contracted physical therapists to bill for treatments.

Fiscal Efficiencies

Districts have little control over special education revenues. California distributes funds to SELPAs based on their member districts' total ADAs, not on the number of identified special education students.

The reporting methods of districts, county offices, and SELPAs vary. Some districts include transportation, while others do not, and there are variations in how special education funds are allocated through a SELPA's approved allocation plans. Therefore, it is not always possible to accurately compare a district's general fund contribution to that of other districts. However, a district may need to address a general fund contribution that is excessive or increasing.

Maintenance of effort (MOE) is the federal statutory requirement that a district must spend the same amount of state and local money on special education each year, with limited exceptions. In considering how to reduce the overall general fund contribution, the district is required to follow the guidelines in the MOE document (20 U.S.C.1413 (a)(2)(A)). The MOE document from the California Department of Education (CDE) lists the following as exceptions that allow the district to reduce the amount of state and local funds spent on special education:

1. The voluntary departure, by retirement or otherwise, or departure for just cause, of special education or related services, personnel, who are replaced by qualified, lower-salaried staff.
2. A decrease in the enrollment of children with disabilities.
3. The termination of the obligation of the agency to provide a program of special education to a particular child with a disability that is an exceptionally costly program, as determined by the State Educational Agency, because the child:
 - a. Has left the jurisdiction of the agency;
 - b. Has reached the age at which the obligation of the agency to provide FAPE (free and appropriate public education) to the child has terminated; or
 - c. No longer needs the program of special education.
4. The termination of costly expenditures for long-term purchases, such as the acquisition of equipment or the construction of school facilities.

MOE documents provided to FCMAT indicate the district's general fund contribution was \$24,947,167 or 33% in 2013-14 and \$28,019,860 or 35% in 2014-15. The district's 2015-16 second interim expenditure budget for special education is \$86,704,517 based on the MOE document. The district's general fund contribution for 2015-16 is projected to be \$33,686,938, which is 39% of the special education budget. According to the March 2013 Special Education Task Force Report on the general fund contribution percentage to special education, the state-wide average is 43%.

Several factors affect a district's general fund contribution, including revenue received to operate the programs and the expenditures for salaries, benefits, staffing and caseloads, nonpublic school and nonpublic agency costs and transportation. Litigation can also increase a district's general fund contribution.

The LCFF was enacted with the passage of the 2013-14 Budget Act, replacing the previous K-12 finance system with a new funding formula. The new formula for school districts and charter schools is composed of uniform base grants by grade spans (K-3, 4-6, 7-8, 9-12) and includes additional funding for targeted students. The previous K-12 finance system included a revenue limit special education ADA transfer for special day class attendance from the unrestricted general fund to the special education program. However, special day class ADA is no longer reported separately, and the CDE determined that this revenue limit special education ADA transfer will no longer take place due to the LCFF. As a result, the implementation of the LCFF has automatically increased the amount of many districts general fund contribution to special education because of this accounting change.

Effective in 2013-14, special education transportation revenue became an add-on to the LCFF. Now that it is part of the LCFF, it is no longer restricted special education revenue. This change in accounting has changed the amount of many districts general fund contribution to special education. The district provides special education transportation as a related service. There is no statewide data that provides an accurate average for the percentage of students with IEPs transported as a related service. Studies have suggested that districts with well-managed IEP processes transport approximately 10%-15% of their students with IEPs.

The district's special education contribution has increased by \$8,739,771 since 2013-14 or 35.0%.

The table below compares the special education revenue the district receives from state and federal resources. The special education revenue data provided to FCMAT was posted to the district's special education program in the financial system. Since 2013-14, the district's revenue received to operate special education programs has increased by \$2,267,815 or 5.8%.

Special Education Revenues from 2013-14 to Projected 2015-16

Description	2013-14	2014-15	Projected 2015-16	Difference from 2013-14 to projected 2015-16
IDEA Entitlement	\$7,340,793	\$7,777,591	\$8,824,953	+\$1,484,160
IDEA Preschool	\$1,340,635	\$1,405,557	\$1,425,412	+\$84,777
IDEA Mental Health	\$510,431	\$516,977	\$513,303	+\$2,872
State Improvement Grant	\$546	\$1,196	\$4,000	+\$3,454
Early Intervention Grant	\$162,284	\$162,284	\$162,284	+\$0
Alternative Dispute Resolution Grant	\$0	\$0	\$21,097	+\$21,097
Federal Workability	\$63,668	\$52,503	\$74,033	+\$10,365
AB602 State Apportionment	\$23,236,145	\$24,262,228	\$24,164,384	+\$928,239
AB602 Transfer of Apportionment from COE	\$273,587	\$273,587	\$273,587	+\$0
State Mental Health	\$2,620,294	\$2,681,649	\$2,620,820	+\$526
State Preschool Grant	\$17,256	\$0	\$0	-\$17,256
Infant Discretionary Grant	\$4,510	\$2,389	\$7,315	+\$2,805
State Workability	\$437,480	\$440,604	\$440,604	+\$3,124
Low Incidence	\$3,869	\$0	\$0	-\$3,869
Other Local Revenues	\$492,104	\$397,502	\$377,476	-\$114,628
Sub-Total, District	\$36,503,602	\$37,974,067	\$38,909,268	+\$2,405,666
Charters AB602 State	\$2,403,427	\$2,454,229	\$2,194,061	-\$209,366
Charters Mental Health	\$0	\$0	\$71,515	+\$71,515
Total, Revenues	\$38,907,029	\$40,428,296	\$41,174,844	+\$2,267,815

School districts throughout the state face a continuing challenge in funding costs for serving special education students. Districts are faced with mounting increases in the differences between the federal and state governments' funding and the mandated costs for these vital student services.

The table below compares the district's special education program expenditures. The special education expenditure data is based on the MOE documents provided to FCMAT. Since 2013-14 the district's expenditures to operate special education programs has increased by \$11,890,173 or 15.9%.

Special Education Expenditures from 2013-14 to Projected 2015-16*

Description	2013-14	2014-15	Projected 2015-16	Difference from 2013-14 to projected 2015-16
Certificated Salaries	\$26,025,006	\$27,717,734	\$29,720,490	+\$3,695,484
Classified Salaries	\$17,746,949	\$18,855,163	\$20,265,072	+\$2,518,123
Benefits	\$17,995,781	\$21,547,998	\$23,731,860	+\$5,736,079
Materials and Supplies	\$1,728,420	\$1,679,351	\$2,200,284	+\$471,864
Contracts and Operating	\$5,839,926	\$5,944,324	\$7,094,798	+\$1,254,872
Capital Outlay	\$2,637,370	\$600,000	\$0	-\$2,637,370
State Special Schools	\$16,131	\$47,991	\$74,745	+\$58,614
Debt Service	\$150,390	\$299,766	\$301,993	+\$151,603
Sub-Total, Direct Costs	\$72,139,973	\$76,692,327	\$83,389,242	+\$11,249,269
Indirect Charges	\$2,674,370	\$2,514,694	\$3,315,275	+\$640,905
Total, Expenditures	\$74,814,343	\$79,207,021	\$86,704,517	+\$11,890,174

*Excludes the Program Cost Report Allocation.

The table below compares the district's December 1 identified special education pupil count and the expenditures per identified pupil count. Since 2013-14 the district's identified special education pupil count has increased by 304 pupils or 5.4% and expenditures per identified special education pupils have increased by \$1,322 per pupil or 10.0%.

Description	2013-14	2014-15	Projected 2015-16	Difference from 2013-14 to projected 2015-16
December 1 Identified Pupil Count	5,635	5,843	5,939	+304 (+5.4%)
Expenditures per Pupil	\$13,277	\$13,556	\$14,599	+\$1,322 (+10.0%)

Staff reported that communication between the Business Services and Special Education departments is ineffective. The budget has been simply rolled from one year to the next and adjusted as needed. The Business Services and Special Education departments have not met regularly regarding the special education budget. The Special Education Department is held accountable for the special education budget.

Recommendations

The district should:

1. Monitor the district's general fund contribution through the annual MOE and determine if it can reduce expenditures using any of the exemptions allowed.
2. Establish monthly meetings with the special education director, program managers, and the fiscal support position housed in the Special Education Department and the business services director, budget analyst, and the fiscal support staff responsible for the special education budget that include the following topics:
 - a. Budget development
 - b. Budget monitoring
 - c. Maintenance of effort requirements
 - d. Additional staff requests or change in assignments
 - e. Nonpublic school and/or agency contacts and invoices and new placements
 - f. Due process or complaint issues
 - g. Number of students being transported
 - h. Staff caseload
 - i. Identified student counts
 - j. Identified needs
3. Assign the Business Services Department to implement zero-based budgeting. Each department should build and propose its budget including staffing. The Special Education, Business Services, and Human Resources departments should review all of the staffing and assignments through this process, including contracted positions. Staff should review how positions are being used and charged to the district budget.
4. Assign the Business Services Department to provide additional training for the fiscal support position housed in the Special Education Department.

Appendices

A. Study Agreement

Appendix A: Study Agreement



FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM STUDY AGREEMENT January 25, 2016

The Fiscal Crisis and Management Assistance Team (FCMAT), hereinafter referred to as the team, and the San Juan Unified School District SELPA, 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. Review the district's implementation of student success team (SSTs), Response to Intervention (RtI), and multi-tiered system of supports (MTSSs) and make recommendations as needed.
2. Determine whether the district over-identifies students for special education services compared to the statewide average, and make recommendations that will reduce over-identification, if needed.

3. Analyze whether the district provides a continuum of special education and related services from preschool through 22 years of age, and include an analysis of the least restrictive environments.
4. Analyze special education teacher staffing ratios, class and caseload size using the statutory requirements for mandated services and statewide guidelines.
5. Review the efficiency of staffing allocation of special education paraeducators throughout the school district. Review the procedures for identifying the need for paraeducators, the process for monitoring the resources for allocating paraeducators and determining the ongoing need for continued support from year to year. (Include classroom and 1:1 paraeducators)
6. 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.
7. Review Special Education Department staffing and organization in the district's central office, including staffing comparisons, to ensure that clerical and administrative support, programs, and overall functionality are aligned with those of districts of comparable size and structure. The team will compare the district's special education staffing and organization with that of three to six similar-sized elementary districts using the Ed Data website, or six districts selected by the district. The report will include recommendations to improve staffing and organizational efficiency and effectiveness.
8. Review county office, NPS and NPA placements and make recommendations for improving this process and cost efficiencies.
9. Review the costs of due process, mediations, and settlements for the past three years.
10. Review the revenues and allocations for Medi-Cal LEA and determine areas for greater efficiencies.
11. Determine the district's general education fund contribution to special education and make recommendations for greater efficiency.

B. Services and Products to be Provided

1. Orientation Meeting - The team will conduct an orientation session at the district to brief district management and supervisory personnel on the team's procedures and the purpose and schedule of the study.
2. On-site Review - The team will conduct an on-site review at the district office and at school sites if necessary.
3. Exit Meeting - 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 memorializing the topics discussed in the exit meeting.
5. Draft Report - 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. Jackie Kirk-Martinez, Ed.D.</i>	<i>FCMAT Lead Consultant</i>
<i>B. Don Dennison</i>	<i>FCMAT Consultant</i>
<i>C. Jackie Martin</i>	<i>FCMAT Consultant</i>
<i>D. JoAnn Murphy</i>	<i>FCMAT Consultant</i>
<i>E. Sandee Kludt, Ed.D.</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 Education Code (EC) 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 2A, the total estimated cost of the study will be \$35,000.

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

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

5. RESPONSIBILITIES OF THE DISTRICT

- A. The district will provide office and conference room space during on-site reviews.
- B. The district will provide the following if requested:
 - 1. Policies, regulations and prior reports that address the study scope.
 - 2. Current or proposed organizational charts.
 - 3. Current and two prior years' audit reports.
 - 4. Any documents requested on a supplemental list. Documents requested on the supplemental list should be provided to FCMAT only in electronic format; if only hard copies are available, they should be scanned by the district and sent to FCMAT in electronic format.
 - 5. Documents should be provided in advance of fieldwork; any delay in the receipt of the requested documents may affect the start date and/or completion 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:	May 24, 2016 at 9 a.m.
Staff Interviews:	May 24-25, 2016
Exit Meeting:	May 27, 2016 at 9 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 which, in the team's judgment, it must obtain information. Once the team has completed its fieldwork, it will proceed to prepare a preliminary draft report and a final report. Prior to completion of fieldwork, 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 fieldwork, 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 fieldwork 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 of 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 upon request.


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: Kent Kern, Superintendent
 Telephone: (916) 971-7104
 E-mail: kkern@sanjuan.edu


 Kent Kern, Superintendent
 San Juan Unified School District


 Date


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

January 25, 2016
 Date