

CSIS California School Information Services

Napa Valley Unified School District

Special Education Review

April 12, 2017



Joel D. Montero
Chief Executive Officer





April 12, 2017

Patrick Sweeney, Ed.D., Superintendent
Napa Valley Unified School District
2425 Jefferson Street
Napa, CA 94558

Dear Superintendent Sweeney:

In May 2016, the Napa Valley Unified School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for management assistance. Specifically, the agreement stated that FCMAT would perform the following:

1. Review the effectiveness of the district's inclusion model as the least restrictive environment. Include a review of the inclusion model's effect on the general education environment, the costs of the inclusion model as compared to a traditional service delivery, and both the general education and special education teacher workload that results from the inclusion model. Review the description, process and procedures, and professional development of the inclusion model, and make recommendations for improvement, if any.
2. Analyze special education teacher staffing ratios, class and caseload size using the statutory requirements for mandated services and statewide guidelines.
3. Review the efficiency of special education paraeducator staffing throughout the district. Review the procedures used to identify the need for paraeducators, and the processes for monitoring costs related to paraeducators and determining the need for continued support from year to year.
4. 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.
5. 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 align with those of districts of comparable size and structure. Include responsibilities of IEP administrative designee and functions of the position as it relates to the special education department staff roles and responsibilities. Compare the district's special education staffing and organization with that of three to six similar sized K-12 districts

FCMAT

Joel D. Montero, Chief Executive Officer

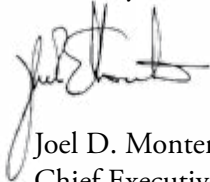
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using the Ed Data website, or six districts selected by the district. Include recommendations to improve staffing and organizational efficiency and effectiveness, if any.

6. Review COE, NPS and NPA costs and placements, and make recommendations for improving the process for placement and cost efficiencies, if necessary.
7. Review the costs of due process, mediations, and settlements for the past three years and make recommendations for decreasing costs and improving alternative processes, if any.
8. Determine the district's unrestricted general fund contribution to special education and make recommendations for greater efficiency, if needed.

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

Sincerely,



Joel D. Montero
Chief Executive Officer

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About FCMAT

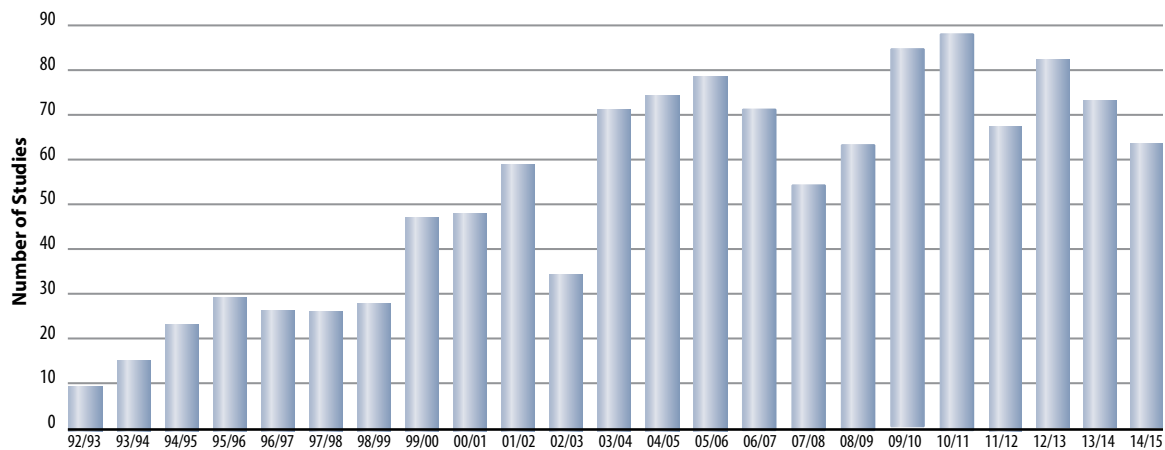
FCMAT’s primary mission is to assist California’s local K-14 educational agencies to identify, prevent, and resolve financial, human resources and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related 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

Background

Located in Napa County, the Napa Valley Unified School District has a seven-member governing board and serves approximately 17,960 students at 19 elementary, five middle, three comprehensive high, one continuation high, and two alternative high schools. The district also offers an independent study program and has authorized one direct-funded charter school.

The district is part of the Napa County Special Education Local Plan Area (SELPA), and according to 2015-16 data from the California Department of Education, 2,245 students ages 0 to 22 who reside in the district are identified with special needs.

In May 2016, the Napa Valley Unified School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for management assistance to review the district's special education program.

Study and Report Guidelines

FCMAT visited the district on October 18-20, 2016 to conduct interviews, collect data, and begin reviewing documents. This report is the result of those activities and is divided into the following sections:

- Executive Summary
- Inclusive Model and Least Restrictive Environment
- Special Education Teacher Staffing
- Instructional Assistant Staffing
- Related Service Provider Staffing
- Organizational Structure
- Contracted Services
- Due Process and Mediation
- Fiscal Contribution
- 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 employer but was working solely as an independent contractor for FCMAT. Each team member reviewed the draft report to confirm its accuracy and to achieve consensus on the final recommendations.

Executive Summary

Inclusive Model and Least Restrictive Environment

In 2011-12 the district determined that students with special needs should be included more in the general education classrooms than they had been prior to that time. The district also determined that it would reduce the self-contained special day classes (SDCs) for students with mild to moderate disabilities from the continuum of service delivery options. The inclusion service model reassigned most elementary students in SDCs for the learning handicapped (LH) to general education classes. The elementary LH SDC certificated and classified instructional staff members were reassigned to support these students as well as resource specialist students and to implement individualized education programs (IEPs) in general education classrooms.

Because of the change in service delivery, there are no continuum of service options for all learners because there are no elementary SDCs for students with mild to moderate disabilities, except for the five discussed in the special education teacher staffing section of this report. The district should develop a collaborative committee to discuss what is missing in the service delivery model and plan how to alter it. The district should also consider adding strategically placed SDCs for students with mild to moderate disabilities who require more specialized academic instruction in a pull-out or blended service delivery model.

Special Education Staffing

The district does not maintain a staffing and student list by program, service and caseload, and lacks an accurate process for aligning position control with Special Education Department staffing. FCMAT requested documents to determine special education staffing, full-time staff equivalents, and the number of students served. Several documents were provided in various forms; however, the staffing information and student caseload numbers were inconsistent. FCMAT made a thorough effort to resolve inconsistencies using the available data, but it was not possible to achieve absolute accuracy regarding total caseloads by type of service provider or grade level. The district should develop and maintain an effective and consistent tracking system for special education staffing, assignments and caseloads that is updated routinely. It would benefit the district to have the Special Education, Business Services and Human Resources departments rigorously analyze staffing and caseload data and routinely review and update it to ensure accuracy.

FCMAT's analysis indicated that maximizing resource specialist, LH SDC and severely handicapped (SH) SDC teacher caseloads at Education Code, industry standard and/or collective bargaining agreement limits would enable the district to reduce staffing in each of these areas. The district should routinely review all special education teacher caseloads to ensure that it is maintaining maximum staffing efficiency while fully implementing IEPs and meeting students' needs.

The district does not consistently maintain instructional assistant (IA) classification, FTE and site/classroom/student assignment in an accessible electronic or paper format. To effectively monitor the status of special education IAs and project future staffing needs, this information must be consistently updated for accuracy and shared with applicable management staff and departments.

FCMAT's analysis indicates that the district is not overstaffed in basic IA support; however, the district should evaluate the provision of 1-to-1 IAs more closely because it has more 1-to-1 IAs than non 1-to-1 special education IAs, and the costs for all of these positions is significant. The

district should ensure that the process used to determine if a student requires 1-to-1 support is implemented consistently and that an individual fading plan (that is, a plan to phase out IA services) with specific goals is developed and included in the IEP. It would also benefit the district to ensure that management staff thoroughly review and discuss with elementary instructional staff and principals the effect of the inclusion service model on behavior issues.

Based on industry standards, psychologists are understaffed by 2.0 FTE, adapted physical education teachers (APE) are overstaffed 1.0 FTE, and occupational therapists (OTs) are overstaffed 0.7 FTE. However, the APE teachers support whole classes in the moderate to severe programs to release some teachers for their preparation periods, and the district's inclusive model has made it challenging for students to receive in-class OT services. The district should review the caseloads of psychologists and determine if staffing is adequate for its needs, and further review the APE and OT assignments and caseloads to determine if staffing can be reduced.

The district should also further analyze the efficiencies of its health care services and supports and determine if all the health care staff are required.

Organizational Structure

Although comparative information is useful, it should not be the only measure of appropriate staffing levels. School districts are complex and vary widely in demographics and resources. Careful evaluation is recommended because generalizations can be misleading if unique district circumstances are not taken into account. FCMAT compared the Special Education Department's administrative and clerical support staffing with that of three unified school districts of comparable size and demographics. Based on this comparison, special education management is overstaffed by four positions.

In interviews, staff indicated that the department is perceived as reactive rather than proactive, and that communication from the administration is inconsistent, with mixed directives. Interviewees consistently reported a lack of responsiveness from the special education administration to emails and phone calls. The district should set standards for effective communication with the Special Education Department and ensure that they are implemented and monitored.

The clerical support staff need to be cross trained on department duties, be trained and given access to the Special Education Information System (SEIS), and ensure that student data is reported correctly and aligned in the district's student information system and the SEIS. One of the current clerical positions in the special education office should also be responsible for the office workflow. Clerical staff should be given the opportunity to meet regularly with administrators for direction and support and to solve problems critical to their workload.

The district's coordinators, program specialists and other school site special education staff are assigned to serve as administrative designees in IEP meetings; however, the assignment process is unclear, and the department does not maintain a formal list of authorized administrative designees. Staff reported that when issues arise in an IEP meeting that involve expenditures, they are not authorized to allocate additional resources; rather, the meeting is suspended so the administrative designee can check with an administrator who has the authority to spend district resources. It would benefit the district to rectify this issue because it may be found out of compliance if meetings are suspended for this purpose.

Contracted Services

The district has no written process to guide IEP teams in making decisions about placing students in nonpublic schools (NPSs), nonpublic agencies (NPAs) or with the Napa County Office of Education. Having a written process would improve efficiencies and help guide IEP teams and training for all applicable staff on the use and access of these services.

The county office provides intensive services for preschool students with severe disabilities and for those with autism, and non-intensive preschool services. The district may be able to design programs to meet students' needs in a more cost efficient manner. However, the district must first examine the total costs associated with each program and ensure that the Special Education Department is sufficiently organized to accommodate new programs and services. The district should also examine NPA costs for independence facilitators and explore options to hire district staff in lieu of using NPA services.

The district is deficit spending in its mental health budget, and there is no evidence of a comprehensive day treatment or residential component in the current mental health plan. It is unclear whether all the funds are being used for students whose IEPs include mental health services. The district should eliminate deficit spending in the mental health budget and create a reserve for day treatment and residential services.

Fiscal Contribution

School districts throughout the state face a continuing challenge in funding the costs to serve special education students. Districts are faced with continuing increases in the difference between the federal and state government funding received and the mandated costs for these vital student services. The district's unrestricted general fund contribution to special education was 47% of total special education expenditures in 2014-15, 52% in 2015-16, and is projected at 54% in the 2016-17 approved budget. Information provided by the California Legislative Analyst's Office in February 2017 indicates that the unrestricted general fund contribution has increased to approximately 60% statewide. The district should monitor its unrestricted general fund contribution, determine if expenditures can be reduced using any of the exemptions allowed in the special education maintenance of effort (MOE), and ensure that staff are charged appropriately to the special education program.

The district reports the expenditures for the county office-operated special education preschool program on its MOE but does not include the December 1 preschool pupil count. The county office is considered the district of service for the students on the December 1 pupil count. However, it does not report these students on its MOE because the preschool program expenditures are not included on its report. The district needs to review the expenditure coding for the special education preschool program and work with the county office and the SELPA to correct the MOE report.

Staff reported concerns about a lack of timely communication regarding the special education budget. It would benefit the district for the Special Education and Business Services department administrators to meet monthly and discuss topics that affect the budget.

Findings and Recommendations

Inclusive Model and Least Restrictive Environment

The definition of an inclusive model varies among California school districts. The intent of an inclusive model is that all students may attend the school located within their home boundaries in the grade level that matches their chronological age in general education classes and can access the general education curriculum. It is further the intent that students who require specialized academic instruction (SAI) receive this service either in the general education classroom or through a pull-out service for specific skill building instruction depending on the student's need.

In 2011-12 Napa Valley Unified School District determined that students with special needs should be included in the general education classrooms more so than what they were prior to that time, for the reasons mentioned above. It was further determined that the district would reduce the self-contained mild to moderate special day classes from the continuum of service delivery options that consists of inclusion, a resource specialist program, mild to moderate special day classes and moderate to severe special day classes. A special day class (SDC) is a special education service supporting students with SAI on a school campus in a separate classroom and mainstreaming the students into the general education classroom as the student is able to be successful.

During FCMAT's fieldwork, it was the perception of multiple staff interviewed that the inclusion model was implemented without a strategic plan. However, central office special education staff indicated there was a plan and the model was phased in over a few years. Some staff members indicated that no professional development was provided, but central office special education staff reported professional development was provided at the time the inclusion model was implemented. Due to staff changes, it would benefit the district to provide additional professional development to general education teachers so they are able to modify or scaffold student learning and to special education staff including teachers, instructional assistants and related services providers, so they are able to adjust their teaching techniques as needed and support the general education teachers. Interviews also indicated that some staff continue to have concerns about the impact of the service delivery model on students.

Documents reviewed and staff interviewed consistently indicated the inclusive model has multiple definitions in the district. Staff could not describe the district's various service delivery options. They indicated there were a few special day classes, but could not explain the criteria for students to be referred to those classes or what the differences were among them. Staff reported inclusion was for all students unless a district office staff member referred the student to a Kinder Academy class, a class for social/emotional challenges, a class for students with autism, or a class for students with significant intellectual disabilities. Some staff reported that the district operates learning centers; however, there is no center in place for students to be provided SAI through a pull-out service.

In the current inclusive model, students are in the general education classroom the entire day, and if they cannot access the general education curriculum, they are provided a 1-to-1 instructional assistant (IA) or an independence facilitator (IF). Many of the students who were formerly in a mild to moderate SDC where there was a teacher and one or two IAs now are in a general education class with an IF or an IA and receive inconsistent specialized academic instruction. Students with special needs can progress in a general education classroom with supports and

learn independence; however, specialized training for staff and planning is required for successful implementation. At the time of FCMAT's fieldwork, there was limited to no collaboration time provided to general education and special education teachers to support students effectively.

Although research shows there can be rapid and successful progress for closing the achievement gap through an inclusive setting, there is also research that shows a 1-to-1 student to staff ratio is not the least restrictive environment for students unless intensive professional development is provided to the general education and special education staff with ongoing collaboration and progress monitoring.

District documents show there are three Kinder Academy classrooms, one class for other health impaired and one class for emotional disturbance. There are no other classroom settings or options for elementary students with other mild to moderate disabilities, such as specific learning disabled, who may need more of a blended pull-out service paired with general education mainstreaming. Due to the change in service delivery, there is no continuum of service options for all learners, other than those in the Kinder Academy, because there are no elementary mild to moderate SDC classes to access.

Staff reported that there are more options at the secondary level because they can cluster students into specific core subject areas taught by an education specialist; however, many students continue to receive 1-to-1 IA or IF supports. Secondary special education staff are not provided structured collaboration time with general education teachers to discuss student needs, but they are provided two daily preparation periods that could allow for periodic collaboration.

Inclusion was not intended to be a "one size fits all" model or a model that provides districts a wide continuum of services. Napa Valley's current model consists of a restrictive environment that does not support independence. As described above, an SDC typically includes one teacher and one or two instructional assistants to support many students, whereas the district's inclusion model provides numerous students with a 1-to-1 IA or IF, which is less cost efficient than an SDC setting. Because the staffing data provided by the district is inconsistent and lacks a description of inclusion supports for the general education program, FCMAT is unable to compare the district's inclusion model cost to that of a traditional inclusion service delivery model.

Inclusion models can work effectively and efficiently if strategic plans are developed. It is the California Department of Education's (CDE's) goal to bring one system of education to all districts and break down special education isolation. The CDE recognizes this cannot be implemented quickly and is working on plans to develop ways to support the goal. Until then Napa Valley should analyze its delivery model and continuum of services and look at additional options. To develop a comprehensive inclusive delivery system a district needs to consider:

- The benefits and challenges of including students with special needs.
- How to include all students.
- How to plan for inclusion.
- How to adapt the general education curriculum to meet the special needs of each included student.
- How to evaluate student performance.
- How to train and support teachers and other service providers.
- Where to find or reallocate the financial resources to provide the aids and supports students with disabilities may need.

- What types of accommodations can and should be made.
- Where successful inclusive programs are located.
- What effective practices exist.
- Where materials can be found for various teaching strategies, accommodations and modifications.
- What the elements of collaboration are.

Recommendations

The district should:

1. Develop a collaborative committee to discuss what is missing in the service delivery model and plan how to alter it.
2. Add to the existing service delivery model with strategically placed special day classes for students with mild to moderate disabilities who require more specialized academic instruction in a pull-out or blended service delivery model.
3. Develop program service delivery descriptions that include general criteria and differences between models.
4. Develop a consistent evaluation tool to determine IA and/or IF needs for students with special needs who are included in the general education setting, and train staff to implement it.
5. Develop independence plans for students with special needs who are in the general education setting, and train staff to implement them.
6. Develop methods to evaluate student performance as it relates to student learning in the general education setting, and train staff to use them.
7. Determine districtwide consistent collaboration times for general education and special education staff to plan and develop curriculum for various learning abilities and styles.
8. Provide professional development to general education teachers and special education staff as needed to support the inclusion model.

Special Education Teacher Staffing

As previously discussed, the district redesigned the delivery of special education service to elementary mild to moderate students in the 2011-12 school year. The district initiated an inclusion service model by reassigning most elementary students in learning handicapped (LH) SDCs to a general education class at their grade level. The elementary LH SDC certificated and classified instructional staff members were reassigned to support these students and implement individualized education programs (IEPs) in the general education classroom along with resource specialist students. Most elementary LH SDC teachers became resource specialists for the purposes of tracking in the district's position control system, and Special Education Department staff indicated that co-teaching began at the secondary level. Five LH SDCs remain in operation at the elementary level and are designated as: one class for other health impaired, three for Kinder Academy that each operate as a one-year service for mild to moderate kindergarten students similar to a transitional kindergarten program, and one for emotionally disturbed. Although classes for emotionally disturbed students are normally included with the severely handicapped SDCs, district documents list the elementary emotionally disturbed class as an LH SDC. Therefore, this report treats the class as an LH SDC in all references and calculations of full-time equivalent (FTE) and caseload. The special education preschool population is served entirely by the Napa County Office of Education.

FCMAT requested documents to determine special education staffing, full-time staff equivalency, and the number of students served. Several documents were provided in various forms; however, staffing assignments, staffing FTE, and student caseload numbers were inconsistent. For this study four sources were used in an attempt to establish consistency and reliability in certificated staffing and student caseload data: position control, Special Education Information System (SEIS), Aeries student information system, and Special Education Department generated documentation. Significant inconsistencies existed among all four of the sources, and no one source of information could be considered reliably accurate. For example, teacher names appear on one list but not on another, and teachers are identified on one list as SDC but as resource specialist on another. The study team made a thorough effort to resolve inconsistencies using the available data, but absolute accuracy in establishing total caseloads by type of service provider or grade level was not possible. It would benefit the district to have the Special Education, Business Services and Human Resources departments rigorously analyze teacher staffing and student caseload data and routinely review and update it to ensure accuracy.

Resource Specialist Services

Some special education caseloads have been established through the district's certificated collective bargaining agreement. Based on the agreement, the elementary resource specialist caseload is not to exceed 25 in 2016-17 and 24 in 2017-18. These caseloads are lower than those in California Education Code Section 56362, which establishes a maximum resource specialist caseload of 28.

The district employs 22.4 FTE elementary resource specialists with an average caseload of 22.59 students per FTE. In addition, the district provides one resource specialist and instructional assistant support to a direct-funded charter school, which is billed for these services. The resource specialist and the student caseload in that assignment are not included in the following calculations. Maximizing elementary resource specialist caseloads at 28 students per teacher FTE could reduce staffing by 4.33 FTE; staffing caseloads at 25 students per FTE could reduce staffing by 2.16 FTE.

The district employs 11.6 middle school resource specialists with an average caseload of 24.40 students per FTE. Maximizing middle school resource specialist caseloads at 28 students per teacher could reduce staffing by 1.49 FTE. The district employs 16.8 FTE high school resource specialists with an average caseload of 20.06 students per FTE. Maximizing high school resource specialist caseloads at 28 students per teacher could reduce staffing by 4.76 FTE.

Overall, maximizing resource specialist caseloads at the Education Code level of 28 students could reduce staffing by 10.58 FTE. If all resource specialist caseloads were at 25 students per FTE, the district could reduce staffing by 5.76 FTE.

Resource Specialist Caseloads

Grade Span	No. of FTE	Total Caseload	District Caseload Average	Collective Bargaining Agreement	Education Code
Elementary	22.4	506	1:22.59	1:25	1:28
Middle	11.6	283	1:24.40	N/A	1:28
High	16.8	337	1:20.06	N/A	1:28

Source: District data and Education Code Section 56362

At the secondary level, resource specialists teach multiple sections of general education content classes as part of a Response to Intervention (RtI) approach. Special education funds the resource specialists who provide this service. The district should charge the portion of resource specialist salary and benefit costs that is used for RtI support to the general education budget.

Learning Handicapped Special Day Class

A school district may establish special day classes to serve distinct special need student populations. Therefore, averaging SDC teacher staffing and student caseloads ultimately must be weighed against areas of need in the local student population. However, a global analysis of SDCs serves as a point of reference for more in-depth analysis as needed.

The certificated collective bargaining agreement established a caseload limit for learning handicapped (LH) teachers of 20 students. The Education Code does not establish maximum caseloads for these classes, but the industry standard for mild to moderate LH SDCs is 12-15 students per teacher FTE.

The district employs 5.0 FTE elementary LH SDC teachers with an average caseload of 9.0 students per FTE. Maximizing elementary LH SDC caseloads at the industry standard of 15 students could reduce staffing by 2.0 FTE. Raising caseloads to the bargaining agreement maximum of 20 students could reduce staffing by 2.75 FTE.

The district employs 3.0 FTE middle school LH SDC teachers with an average caseload of 17.33 students per FTE. Compared to the industry standard maximum caseload of 15 students, the district is understaffed by 0.47 FTE. Compared to the bargaining agreement maximum of 20 students, the district is overstaffed by 0.40 FTE.

At the high school level, the district employs 6.0 FTE with an average caseload of 14.0 students per FTE. If high school LH SDC caseloads were maximized to the industry standard of 15 students, the high school is overstaffed by 0.40 FTE. If raised to the bargaining agreement maximum of 20 students, staffing could be reduced by 1.80 FTE.

Overall, maximizing LH SDC caseloads at the industry standard of 15 students could reduce staffing by 1.93 FTE. Staffing caseloads at the bargaining agreement maximum of 20 students could reduce staffing by 4.95 FTE.

Learning Handicapped Special Day Class Caseloads

Grade Span	No. of FTE	Total Caseload	District Caseload Average	Collective Bargaining Agreement	Industry Standard
Elementary	5.0	45	1:9.00	1:20	1:12-15
Middle	3.0	52	1:17.33	1:20	1:12-15
High	6.0	84	1:14.00	1:20	1:12-15

Source: District data and industry standards

Severely Handicapped Special Day Class

The district has not altered the severely handicapped (SH) SDC design by implementing the elementary inclusion service model. As with LH SDCs, the SH SDCs may be established to serve specific high needs populations. This analysis serves as a basic review of moderate to severe SDC services across the district, including three classes for the emotionally disturbed. Medically fragile students are also included within the context of SH SDCs.

The certificated collective bargaining agreement established a caseload limit of 15 students for SH SDC teachers. The Education Code does not establish maximum caseloads for these classes, but the industry standard for moderate to severe SH SDCs is 10-12 students per teacher FTE, and the standard for autism spectrum disorder and emotionally disturbed is 8-10 students per teacher FTE. Based on the documents provided, FCMAT was unable to differentiate the SH classes by category for its analysis.

The district employs 16.0 FTE elementary SH SDC teachers with an average caseload of 7.56 students per FTE. Maximizing elementary SH SDC caseloads at the industry standard of 12 students could reduce staffing by 5.92 FTE. If raised to the bargaining agreement maximum of 15 students, staffing could be reduced by 7.93 FTE.

The middle schools have 6.0 FTE of SH SDC teachers with an average caseload of 7.5 students per FTE. Maximizing middle school SH SDC caseloads at the industry standard of 12 students could reduce staffing by 2.25 FTE. If raised to the bargaining agreement maximum of 15 students, staffing could be reduced by 3.0 FTE.

At the high school level, the district employs 8.0 FTE with an average caseload of 9.5 students per FTE. Maximizing high school SH SDC caseloads at the industry standard of 12 students could reduce staffing by 1.67 FTE. If raised to the bargaining agreement maximum of 15 students, staffing could be reduced by 2.93 FTE.

Overall, maximizing SH SDC caseloads at the industry standard of 12 students could reduce staffing by 9.84 FTE. Staffing caseloads at the bargaining agreement maximum of 15 students could reduce staffing by 13.86 FTE.

Severely Handicapped Special Day Class Caseloads

Grade Span	No. of FTE	Total Caseload	District Caseload Average	Collective Bargaining Agreement	Industry Standard
Elementary	16.0	121	1:7.56	1:15	1:10-12
Middle	6.0	45	1:7.50	1:15	1:10-12
High	8.0	76	1:9.50	1:15	1:10-12

Source: District data and industry standards

Recommendations

The district should:

1. Develop an effective and consistent tracking system for special education teacher assignments and caseloads that is updated routinely.
2. Assign the Special Education, Business Services and Human Resources departments to rigorously analyze teacher staffing and student caseload data and routinely review and update it to ensure accuracy.
3. Analyze secondary special education teacher assignments to determine whether some portion of the assignment dedicated to RtI and the general education student population should be charged to the unrestricted general fund.
4. Conduct a thorough and comprehensive internal analysis of all special education teacher caseloads to establish an accurate benchmark that is routinely reviewed to ensure maximum staffing efficiency while fully implementing IEPs and taking into account unique district circumstances.

Instructional Assistant Staffing

Based on documents provided to the study team, the district maintains 12 job titles/categories of instructional assistants (IAs). Basic special education IAs are placed on the classified salary schedule at range 20; independence facilitators (IFs) are placed at range 27. Other instructional assistants, including personal care 1-to-1 attendants, are placed at range 22. There are no specific California Education Code requirements for IA staffing other than in Section 56362(6)(f), which states, "At least 80 percent of the resource specialists within a local plan shall be provided with an instructional aide."

There are established industry standards for IA support to special education teachers and students based primarily on the intensity of service. Industry standards indicate a full-time resource specialist may receive one six-hour (0.75 FTE) IA. Full-time LH (mild to moderate) SDC teachers with a caseload of 12-15 students may receive one six-hour IA. Full-time SH (moderate to severe) SDC teachers with a caseload of 10-12 SH or 8-10 emotionally disturbed, autism spectrum disorder or deaf/hard of hearing students may receive two six-hour IAs. No industry standard is established for 1-to-1 IA staffing regardless of job title. All 1-to-1 IA staffing is considered extra, beyond the standard support levels described above for the basic provision of special education service. Napa Valley's IFs and personal care 1-to-1 attendants provide individual support to students. In some cases a 1-to-1 IA may provide support to two or more students if circumstances and the IEP requirements allow. For the purpose of this study, all IFs and personal care 1-to-1 attendants are treated as 1-to-1 IAs. The service provided by the district to the direct-funded charter school includes 2.20 FTE of IA support, which is not included in this analysis because the charter school is billed for these positions.

The Special Education Department tracks aide assignments in real time on a wall mounted magnetic board in the department office; however, IA classification, FTE and site/classroom/student assignment is not consistently maintained in an accessible electronic or paper format. To effectively monitor the status of special education IAs and project future staffing needs, this comprehensive information must be consistently updated for accuracy and shared with applicable management staff and departments. The responsibility for gathering information on the status of IA assignments is assigned to various management staff in the Special Education Department. Changes in status are ultimately reflected on the department's magnetic board. The management staff involved use a variety of tracking documents. One version of a tracking document, titled Mild-Moderate Staffing Projection for 2016-17 – Total FTE, was identified by the study team as a promising standard for future use throughout the department.

The study team's analysis of IA data is based primarily on information from position control reflected by site and by job classification. The analysis indicates that the district is not over-staffed in basic IA support compared to current special education teacher FTE. There are 50.8 FTE K-12 resource specialists. Using the standard of one six-hour (0.75 FTE) IA per resource specialist FTE, there should be 38.1 IA FTE for resource support. There are 14.0 FTE K-12 LH SDC teachers. Using the standard of one six-hour IA per LH teacher FTE, there should be 10.5 IA FTE for LH SDC support. There are 30.0 FTE K-12 SH SDC teachers. Using the standard of two six-hour IAs per SH teacher FTE, there should be 45.0 IA FTE for SH SDC support. If staffed at industry standard, this represents a total IA staff of 93.6 FTE needed. Excluding all 1-to-1 IA staffing, the district has a total of 79.91 FTE special education IA staff.

Instructional Assistants (excluding 1-to-1 support)

Program	Total Teacher FTE (K-12)	Total District IA FTE	Industry Standard Total IA FTE	IA FTE (+) Over/(-) Under Industry Standard
Resource Specialist	50.8	46.61	38.1	(+) 8.51
LH SDC	14.0	14.58	10.5	(+) 4.08
SH SDC	30.0	18.72	45.0	(-) 26.28
Total IA FTE		79.91	93.6	(-) 13.69

Source: District data and industry standards

The district's significant area of IA support that needs closer evaluation is the provision of 1-to-1 IAs, both IFs and personal care 1-to-1 attendants. As indicated above, there is no industry standard for 1-to-1 IA staffing. While virtually all districts have some 1-to-1 assistants, the numbers vary so widely from district to district there is little basis for establishing an average or standard. Napa Valley employs 55.89 FTE IFs and 26.19 FTE personal care 1-to-1 attendants. The district has more 1-to-1 IAs (82.08 FTE) than non 1-to-1 special education IAs (79.91 FTE), and as shown in the following table, the costs for all of these positions are significant.

Instructional Assistant Salary and Benefit Costs

IA Category	Total FTE	Total Cost
Independence Facilitators	55.89	\$2,419,518
Personal Care 1-to-1 Attendants	26.19	\$ 927,814
All Other IAs	79.91	\$2,855,664
Total Cost		\$6,202,996

Source: District data

The primary role of the IF is to support students with significant behavior management challenges. Review of documentation and interviews with staff indicated that the district has established a well-defined process to determine if a student requires an IF, which includes data collection and formal assessment. The established procedures for assigning an IF includes the development of goals toward student independence that will lead to the eventual elimination of the need for support based on student improvement. However, some staff members indicated that this assessment process is not consistent districtwide, and neither is the annual development of independence goals and reviews of progress on those goals.

At the time of FCMAT's fieldwork, the Special Education Department was also considering the development and implementation of a special circumstances instructional assistant (SCIA) procedure. Implementation of an SCIA procedure would help regulate the need for 1-to-1 IAs that are not IFs. Staff indicated that the ability to effectively respond to special education student behavior in the general education setting has become more challenging since the implementation of the inclusion model that eliminated the elementary LH SDCs. The district has a Positive Behavioral Interventions and Supports (PBIS) system and continues to provide PBIS training to general education staff.

An analysis of IFs by site indicates that approximately 68% of all IF positions are assigned in the elementary setting and 32% are assigned in the secondary setting. It would benefit the district

for the special education and other applicable management staff to thoroughly review and discuss with elementary instructional staff and principals the impact of the inclusion service model on behavior issues in the elementary general education setting.

Interviews with staff indicated that there appears to be a pattern in the district to solve issues of student management by adding 1-to-1 IA support. A review of special education studies conducted in the district in 2006 and 2010 also indicates there is a history of reliance on 1-to-1 IA support. For example, the 2010 report indicates there were 37 IFs; as shown above, that number has increased to 55.89 FTE in the last six years. In addition to the use of its own IFs, the district contracts with a nonpublic agency for additional assistants to provide similar services. This is discussed further in the contracted services section of this report.

The IA personal care 1-to-1 attendant position is assigned based on health needs of a student that require frequent monitoring and assistance. The district also employs licensed vocational nurses (LVNs) and licensed school nurses, and interviews with staff indicated there is some overlap between the duties performed by the personal care 1-to-1 attendants and the LVNs. It would benefit the district for management staff to work with the school nurses to review the roles of personal care 1-to-1 attendants and LVNs and determine if some assignment consolidation is possible.

Recommendations

The district should:

1. Review all instructional assistant titles and assignments to determine if some titles can be consolidated.
2. Ensure that the Special Education Department develops an efficient and accurate documentation system to track all IAs in relation to their classification, FTE and site/classroom/student assignment.
3. Determine which Special Education Department administrative position(s) will assume responsibility for acquiring and monitoring the IA status information, and ensure that it is provided to the director of special education monthly and reviewed at special education administrative meetings.
4. Ensure that the IA status information is reviewed and confirmed routinely with the Special Education, Human Resources and Business Services departments.
5. Develop a procedure for new IA staffing requests that incorporates a thorough review of the monthly status report to determine whether existing staff can be reassigned before processing the request. Ensure that the director of special education routinely presents IA staffing information at district cabinet meetings.
6. Examine the number of special education IAs districtwide and determine if staffing is adequate for its needs and/or if 1-to-1 IAs can be reduced.
7. Ensure that the process used to determine if a student requires an IF is consistently implemented.

8. Develop an SCIA procedure to determine the need for 1-to-1 IA support that is similar to the procedure for IFs and ensure that it is implemented consistently.
9. Ensure that an individual fade plan with specific goals is developed in each IEP that provides for either an IF or an SCIA. Ensure that this procedure is implemented consistently districtwide.
10. Analyze the relationship between the elementary inclusion service delivery model and the increase in elementary IF positions and determine whether the addition of some elementary mild to moderate SDCs could decrease the overreliance on IFs.
11. Examine the duties of the personal care 1-to-1 attendants as compared to the duties of LVNs to determine if greater efficiency and economy can be achieved.

Related Service Provider Staffing

Related services are the developmental, corrective and other supportive services required to assist a child with a disability to benefit from special education (34 CFR 300.34). These services are written in the IEP and include but are not limited to speech pathology, psychological services, physical and occupational therapy, counseling, school health and nursing services.

The district does not maintain a staffing and student list by program, service and caseloads. The district also lacks an accurate process to align position control with Special Education Department staffing, and discrepancies occur within the department's own data. It would benefit the district to maintain one clear and consistent document that includes this information and ensure that it is reviewed and confirmed biweekly with the Special Education, Business Services and Human Resources departments.

FCMAT requested documents to determine special education staffing, full-time staff equivalency, and the number of students served. Several documents were provided in various forms; however, the full-time equivalent (FTE) staffing information and student numbers were inconsistent. Therefore, the study team could not confirm accuracy of the information provided. The study team used three Special Education Department documents, which did not indicate a title or position control number, and the SEIS caseload query to complete its analysis of related service provider staffing. The following narrative and charts are based on the documents provided.

During fieldwork, the study team explained and demonstrated to some Special Education Department staff members how to query the SEIS to gather one source of documentation to determine caseloads consistent with staff positions. However, staff interviews indicated the SEIS may not be accurate because some information may not have been correctly reported in the system.

Psychologists

The Special Education Department provided the study team with several sets of data for psychologist staffing. Most of the district's psychologists are assigned to school sites and perform duties common to this position such as completing initial assessments for special education eligibility, writing reports, participating in IEP team meetings and completing triennial evaluations. Documents indicate one psychologist is on special assignment. This psychologist assesses students and is also assigned to additional specific duties for the behavioral and emotionally disturbed populations and works with behavior specialists and the other health impaired SDC.

One of the program specialists provides psychological assessment as a 0.5 FTE psychologist, and 0.2 FTE of one psychologist is contracted to a direct-funded charter school. There are 3.2 FTE psychologists assigned to provide mental health services; however, inconsistent data between the Special Education, Business Services and Human Resources departments show that 4.7 FTE may provide mental health services. For this report, the study team used 3.2 FTE for mental health services. Given the various duties and numbers of FTE staff, the study team determined 11.6 FTE of the psychologists' time is dedicated to serving the total student population, including the two locally funded charter schools.

Kidsdata.org provides a statewide caseload average of 1,321 for K-12 school psychologists. Based on the district's enrollment of 17,960, psychologists are understaffed by 2.0 FTE.

Psychologist Caseloads

Program	No. of FTE	Enrollment	District Caseload Average	Industry Standard
Psychologist	11.6	17,960	1:1,548	1:1,321

Source: District data and kidsdata.org

Speech and Language Pathologists

The district employs 20.8 FTE speech and language pathologists (SLPs), 0.4 FTE of which is dedicated to a direct-funded charter school, which is billed for services. The charter school portion of the FTE and the number of students served are included in this calculation. The district also contracts with a nonpublic agency for 1.0 FTE SLP.

Recently the SLPs' employee bargaining unit negotiated with the district to increase their salary and to work eight hours per day for 193.5 days per year. In the study team's experience, SLPs usually work a contracted teacher workday and work year. The contract also provides for new hires to receive up to 24 years of service credit for placement on the salary schedule. In the study team's experience, 10-15 years of service credit is more typical. Staff reported the hours, days and service credit were increased for several reasons, with the primary reason to attract SLPs to the district because there is a statewide shortage. Additional reasons included that the psychologists are in the same bargaining unit and have the same number of work hours and days as the change negotiated with the SLPs and that the SLPs have multiple IEP meetings, student assessments, and Medi-Cal billing duties.

Staff reported few of the SLPs provide pre-intervention, also known as Response to Intervention, to students in advance of assessing them. SLPs are hesitant to provide pre-identification supports because those students are not considered part of their caseload.

Based on 21.8 FTE SLPs, the district's average caseload is 54.6. This is within the requirements of Education Code Section 56363.3, which specifies an average caseload of 55 for students in kindergarten through age 22.

Speech and Language Pathologist Caseloads

Program	No. of FTE	Caseload	District Caseload Average	Education Code
Speech and Language Pathologist	21.8	1,191	1:54.6	1:55

Source: District data and Education Code Section 56363.3

Adapted Physical Education

The district employs 3.0 FTE adapted physical education (APE) teachers. Staff reported that APE teachers are expected to support whole classes in the moderate to severe programs to release some teachers for their preparation periods. Staff were concerned this level of service hinders the APE teachers' ability to serve other students. According to the SEIS, 97 students receive APE services. The industry standard for APE student caseload is 45-55; therefore, FCMAT used a caseload of 50. Based on this information, the district is overstaffed 1.0 FTE.

Adapted Physical Education Teacher Caseloads

Program	No. of FTE	Caseload	District Caseload Average	Industry Standard
Adapted Physical Education	3.0	97	1:32.3	1:45-55

Source: District data and industry standards

Occupational Therapists

Occupational therapists (OTs) provide many general education supports to students. OTs collaborate and consult with general education and special education teachers, observe students, provide strategies to teachers and follow up prior to referral for assessment. The OTs primarily provide services in the general and special education classrooms. However, the district's inclusive model has made it challenging for students to receive in-class OT services because the class sizes are larger and there are more distractions.

The district employs 5.1 FTE OTs who serve a total caseload of 219 students. The industry standard for OT student caseload is 45-55; therefore, FCMAT used a caseload of 50. Based on this information, the district needs 4.4 FTE and exceeds the industry standard by 0.7 FTE.

Occupational Therapist Caseloads

Program	No. of FTE	Caseload	District Caseload Average	Industry Standard
Occupational Therapist	5.1	219	1:42.9	1:45-55

Source: District data and industry standards

Behavior Specialists

Districts are increasingly using behavior specialists to support students with behavioral challenges that are usually eligible under autism spectrum disorder or emotional disturbance. Napa Valley has a behavioral subdivision in the Special Education Department. The subdivision consists of a part-time program specialist, a behavior supervisor, 3.4 FTE behavior specialists and 55.89 FTE independence facilitators (IFs). These services are implemented at the top tier of PBIS, which is used districtwide.

The district's initial intent for employing behavior specialists was to work with students who returned from nonpublic schools and exhibited high levels of behavioral escalations. With the implementation of the inclusive model, and according to the IEPs, some students require a level of behavioral supports that dictate an IF. Staff reported that the IFs are trained by the behavior specialists and perform more intensive duties than an instructional assistant (IA). However, the training provided should be offered to all IAs to allow them to better serve students throughout the district. There does not need to be a difference between an IA and an IF, and these positions could be combined. Staff also indicated that the behavior specialists evaluate all of the IFs in collaboration with the behavior supervisor. Staffing lists indicate that the IFs are in general education and SDC classrooms and function primarily as 1-to-1 support. All students receiving this level of support should have a fade plan in the IEP to assess progress toward independence. Staff reported that although there may be fade language on the IEP, it is not reviewed consistently and students continue to receive the high level of support.

The behavior specialists reportedly perform functional behavioral assessments, develop behavior programs, collect data, attend IEP meetings and supervise the IFs. The district's behavior subdivision is unique, and there is no comparable industry standard.

Teachers of the Visually Impaired

Vision and orientation-mobility teachers provide services to students with vision impairments to total blindness. The district employs 2.0 FTE teachers and one brailist. Forty-two students receive itinerant services from the two teachers. Based on this information, 2.0 FTE teachers are within industry standards.

Teachers of the Visually Impaired Caseloads

Program	No. of FTE	Caseload	District Caseload Average	Industry Standard
Teachers of the Visually Impaired	2.0	42	1:21	1:10-30

Source: District data and industry standards

Teachers of the Deaf/Hard of Hearing

The district employs one itinerant teacher for the deaf/hard of hearing. This teacher has a caseload of 61 students according to the SEIS and case manages 16 students. However, staff reported this teacher provides direct support to 16 students and the other students are on consultation, which may include monitoring hearing devices or annual consultation with a general education teacher. Due to the unique nature of the consultation model, there is no comparable industry standard. The district should determine whether students who do not require direct services need an IEP or if they can be exited from special education and provided an accommodation plan.

Nurses

A variety of health care services are provided throughout the district to general education and special education students. The district employs 6.975 FTE LVNs, 5.5 FTE health services assistants, and 5.9 FTE credentialed school nurses. Interviews indicated this team supports all levels of health needs in the district from simple applications of Band-Aids to diabetic monitoring and provisions of insulin. Due to the increase in students with allergies and diabetes, more districts are using LVNs either in lieu of or in addition to school nurses. According to kidsdata.org, the industry standard caseload for school nurses is 2,784. The district's average caseload is 3,044, which is slightly above the industry standard. However, these industry standards do not include health services assistants or LVNs. Therefore, it may benefit the district to further analyze the efficiencies of its health care services and supports and determine if all the health care staff are required.

Nurse Caseloads

Program	No. of FTE	Enrollment	District Caseload Average	Industry Standard
Credentialed School Nurses	5.9	17,960	1:3,044	1:2,784

Source: District data and kidsdata.org

Recommendations

The district should:

1. Maintain a Special Education Department staffing and student list by program, service and caseloads that is clear, consistent and aligned with position control. Ensure that the list is reviewed and confirmed at least monthly with the Special Education, Business Services and Human Resources departments.
2. Ensure that information is correctly reported in the SEIS.
3. Review the psychologist caseloads and determine if staffing is adequate for its needs.
4. Consider implementing a consistent Response to Intervention support process provided by SLPs.
5. Review the APE caseloads and determine if staffing can be reduced by 1.0 FTE.
6. Review the OT caseloads and determine if staffing can be reduced.
7. Provide professional development for IAs at the same level as IFs.
8. Implement fade plans for 1-to-1 supports and review needs as indicated on IEPs.
9. Determine whether students who do not require direct services from a teacher for the deaf/hard of hearing can be exited from special education and provided an accommodation plan.
10. Review its health care staffing and determine if staffing can be reduced.

Organizational Structure

FCMAT compared the Special Education Department's administrative and clerical support staffing with three unified school districts: Antioch, Pasadena and Ventura. These districts were chosen based on comparable size in total enrollment and total special education population, and comparable demographics in the percentage of students eligible for free and reduced-price meals and number of English learners. Comparison data was taken from CDE's DataQuest and from district websites. The total number of students with disabilities from birth to age 22 was reported by district of residence.

Although comparative information is useful, it should not be considered the only measure of appropriate staffing levels. School districts are complex and vary widely in demographics and resources. Careful evaluation is recommended because generalizations can be misleading if unique district circumstances are not taken into account.

Administrative and Clerical Support

District	Special Education Administration		Clerical Support Positions	Total Enrollment	Students with Disabilities
	Title	Total			
Antioch	1 director, 2 coordinators, 3 program specialists	6	3	17,874	2,523
Pasadena	1 asst supt./SELPA director, 2 coordinators, 4 teachers on special assignment	7	7	18,492	2,523
Ventura	2 directors, 5 program specialists	7	5	17,125	1,803
Napa Valley	1 exec director, 4 coordinators, 5 program specialists, 1 supervisor	11	5	18,479	2,245

Source: CDE DataQuest 2015-16 and district websites

The district has 11 special education management positions: one director, four coordinators, one supervisor of behavior services and five program specialists. The average number in the comparison districts is approximately seven.

Each district identifies special education clerical support positions by different titles. Therefore, the study team reviewed the district's administrative and clerical position job descriptions and those posted online for the comparison districts for compatibility. The district has five clerical support positions, and the average number in the comparison districts is five.

The study team has found that the incidence of students with autism in a district affects staffing at all levels in the department, including special education administration. Frequently, the rationale for more administrators is to provide support and oversight to students with autism in district programs or placements outside the district such as nonpublic schools and/or county office of education programs.

FCMAT compared the district's incidence of autism with the three comparison districts. The total number of students with autism reported as the primary disability was reported by district of residence. These comparisons indicate that Napa Valley has the lowest number of students with autism and the highest number of special education administrators.

Incidence of Autism

District	2013-14	2014-15	2015-16
Antioch	206	209	229
Pasadena	300	292	309
Ventura	223	240	253
Napa Valley	151	175	174

Source: CDE DataQuest

Functionality of the Department

Interviews with staff indicated that the department is perceived to be reactive rather than proactive. School site staff reported that communication from the administration is inconsistent with mixed directives. Interviewees consistently reported a lack of responsiveness from the special education administration to emails and phone calls.

The clerical support staff have clearly defined assignments; however, staff interviews indicated there is no cross training on department duties. Not all special education clerical staff have access to the SEIS, which holds critical student information. No dedicated position in the special education office manages the office workflow nor is there an opportunity for staff to routinely meet with administrators for direction and support and to solve problems critical to their workload. FCMAT found that the three comparison districts have a director's administrative secretary who, in addition to other duties, is directly responsible for the office workflow.

Efficient management of student information is impacted by direct linkage between the Aeries student information system and the SEIS. However, the information for students with disabilities is not aligned in both systems. This is a common problem in many districts; however, new software is available that provides the necessary bridge between the student data in both systems.

Several meetings are calendared for coordinators, program specialists and the director of special education; however, the structure lacks a task-oriented process to ensure that the agenda and meeting is focused and that all participants come away with a consistent message.

Functions of the Administrative Designee

California Education Code Section 56341(b)(4) defines the role and requirements of the administrative designee in the IEP process. The district's coordinators, program specialists and other school site special education staff are assigned to serve as administrative designees in IEP meetings. Staff indicated there is ongoing training for administrative designees, but the assignment process is unclear. The Special Education Department does not maintain a formal list of authorized administrative designees.

Staff reported that when issues arise in an IEP meeting that involve expenditures, they are not authorized to add resources such as 1-to-1 aides, equipment and nonpublic agency services. The meeting is suspended so that the administrative designee can check with an administrator who has the authority to spend district resources. It would benefit the district to rectify this issue because it may face lack of compliance issues if meetings are suspended for this purpose.

Recommendations

The district should:

1. Review the administrative staffing needs in the Special Education Department and consider staffing reductions to align with comparably sized districts.
2. Set standards of practice for effective communication with the Special Education Department that are implemented and monitored to ensure that the administration speaks with one voice and is consistent with directives.
3. Establish operating guidelines that require all calls and email be responded to within one business day. If an answer is not immediately available, ensure that the Special Education Department staff makes contact to let the person know when he or she will receive a response and provides ongoing updates until the issue is resolved.
4. Ensure that all Special Education Department clerical support staff are trained in all aspects of the SEIS to manage student information and effectively support administrators and staff.
5. Identify a current clerical support position to be responsible for the special education office workflow.
6. Support necessary cross training of Special Education Department clerical staff to ensure balanced workflow and overall efficiency.
7. Provide opportunities for Special Education Department clerical staff to meet with department administrators to problem solve and troubleshoot areas where administrative support is needed to accomplish assigned tasks.
8. Ensure that information for students with disabilities is aligned in the student information system and SEIS, and consider purchasing appropriate software for this purpose.
9. Ensure that Special Education Department meetings are task oriented and focused and that all participants receive a consistent message.
10. Maintain a list of authorized administrative designees for IEP meetings, and ensure that the administrative designee has the necessary authority to make IEP decisions.

Contracted Services

The district uses three types of placement options/services to meet the unique needs of students with disabilities when district programs and services are not available: nonpublic schools (NPS), nonpublic agencies (NPA) and the Napa County Office of Education. The district has no written process to guide IEP teams in making placement decisions involving the use of these entities. The practice is to contact a program specialist or coordinator for assistance. The district would realize greater efficiencies with a written process to guide IEP teams and training for all applicable staff on the use and access of these services.

The county office provides intensive services for preschool students with severe disabilities and autism. The annual costs of intensive services for 45 students with intensive program needs and 25 students with autism was \$2,625,795 as reported in the district's 2015-16 budget. The average cost of these programs is estimated at \$430,463 per class as reported in the 2015-16 county office fee for service budget. A district program may be designed to meet student needs in a more cost efficient manner. However, the district must first examine the total costs to operate such a program, including salaries, statutory and health and welfare benefits for a teacher, support staff and related services providers and the availability and cost of facilities. Currently the Special Education Department is not sufficiently organized to accommodate the addition of new programs and services.

The county office also provides non-intensive preschool services for 198 students and, based on district documents, the total expenditures for these services in 2015-16 was \$1,056,514. In most districts the study team has reviewed, these preschool services are provided by the district; however, staffing shortages in the areas of speech and language pathology and/or occupational therapy often require additional alternative options such as the county office. It would benefit the district to create a work group to analyze the non-intensive related service needs for preschool students and explore options to provide these services at a lower cost.

On June 30, 2011 Assembly Bill 114, Chapter 43, Statutes of 2011 was signed into law. Under AB 114, several sections of Chapter 26.5 of the California Government Code were amended or rendered inoperative, ending the state mandate on county mental health agencies to provide mental health services to disabled students. The law indicates that local education agencies are now solely responsible for ensuring disabled students receive mental health and related services.

The district has developed a comprehensive three tiered system of mental health services defined in its educationally related mental health services documents as "embedded within the universal services that are provided to all students and, on a more targeted level, in alignment with the assessed areas of need in each student's IEP." However, the district is deficit spending in its mental health budget, and there is no evidence of a comprehensive day treatment or residential component to the current plan. It is unclear if all the funds are being used for students whose IEPs designate the need for mental health services.

Funding for intensive day treatment and residential placements should be held in reserve in the mental health budget for possible future placements. The CDE has advised SELPA directors that an audit of mental health funds is imminent to ensure that adequate funding is set aside to meet intense needs for students with disabilities.

High cost NPA services can negatively impact a district's special education budget. One of Napa Valley's primary high cost areas is with McGrew Behavior Intervention Services for independence facilitators at an average cost of \$49,755 per student per year. Documents provided by the district indicate that it may be able to hire its own employees to provide the same level of service at a reduced cost.

Recommendations

The district should:

1. Define the process for all alternate student placements through the use of written procedures and corresponding training for IEP teams.
2. Continue to explore options for creating district programs to reduce overall costs for programs and services.
3. Create a work group to study the service delivery options for the non-intensive preschool program. Identify the specific program needs, and explore the costs of delivering those options in the district.
4. Eliminate deficit spending in the mental health budget for special education services.
5. Establish a reserve in the mental health budget for students with disabilities that includes both day treatment and residential services.
6. Examine high cost NPA usage and explore options to hire district staff in lieu of using NPA services.

Due Process and Mediation

The Individuals with Disabilities Education Act (20 U.S. Code Section 1400) requires school districts to implement all procedural safeguards for all children with exceptional needs. When disputes arise over identification, assessment, educational placement or the provision of a free appropriate public education (FAPE), processes are outlined in the procedural safeguards regarding efforts to resolve disagreements at the lowest level (Education Code Section 56500.3).

The study team reviewed the number of formal filings for due process in the district since 2014-15 and found that the issues related to due process included eligibility, assessment and FAPE. Most of the issues were at the secondary level, and the number of formal filings was low for the district's size. There were no formal due process filings in 2014-15, there were three in 2015-16, and at the time of FCMAT's fieldwork there were three in 2016-17.

The district participates in alternative dispute resolution in an attempt to resolve issues at the lowest level. The director of special education spends significant time with families in the early resolution process with the assistance of district legal counsel. Interviews with staff indicated that the special education administrative staff is continually engaged in due process settlement issues and is unavailable to support school site and staff needs.

Although issues are often resolved outside of due process, these cases generate a variety of costs. For example, in 2015-16 the district paid a settlement for assessment costs of \$17,900 plus parent attorney fees of \$18,000. The district also has its own attorney fees. At the time of FCMAT's fieldwork, the district had no tracking system to monitor and report these costs.

Documents provided by the district indicate that since 2014-15 it has had two formal compliance complaints filed with the CDE. The investigations found that the district was in compliance and/or completed corrective actions in both cases.

Recommendations

The district should:

1. Develop an ongoing system to track due process cases by year, student, grade and school site with all settlement costs, including those to parents and attorneys. Track trends and determine where additional support and training may be needed for each school site. Routinely submit this tracking report to cabinet for review.
2. Ensure that special education administration is sufficiently organized to provide timely response to department and school site needs during mediations and due process.
3. Provide proactive training and support to parents regarding how to resolve issues prior to filing for a due process hearing.
4. Provide proactive training and support to school site administrators and applicable staff to decrease parent requests for due process.

Fiscal Contribution

Districts have little control over special education revenues. California distributes funds to SELPAs based on their member districts' total average daily attendance (ADA), not on identified special education students.

The special education reporting methods of districts, county offices, and SELPAs can 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 unrestricted general fund contribution to that of other districts. However, a district may need to address an unrestricted 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 or more of state and local money on special education each year, with limited exceptions. In considering how to reduce the overall unrestricted general fund contribution, the district is required to follow the guidelines in the MOE document (20 U.S. Code Section 1413 (a)(2)(A)). The MOE document from the CDE lists the following as exemptions that allow the district to reduce the amount of state and local funds spent on special education:

1. Voluntary departure, by retirement or otherwise, or departure for just cause, of special education or related services personnel.
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 free appropriate public education (FAPE) 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 unrestricted general fund contribution to special education was \$13,758,487, or 47% of total special education expenditures in 2014-15 and \$17,714,797, or 52% in 2015-16. Based on the MOE documents, the district's 2016-17 approved budget for special education is \$34,207,597, and the unrestricted general fund contribution is projected to be \$18,556,332, or 54%. According to the March 2015 Special Education Task Force Report on the general fund contribution percentage to special education, the statewide average was 43%. The California Legislative Analyst's Office 2017-18 Budget: Proposition 98 Education Analysis dated February 9, 2017, states that in 2014-15 "state and federal categorical funding covers about 40 percent of special education costs in California. Schools cover remaining special education costs with unrestricted funding (mostly from LCFF)." This information indicates that the unrestricted general fund contribution has increased to approximately 60%.

Several factors affect a district's unrestricted 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 unrestricted general fund contribution.

The Local Control Funding Formula (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 formula for school districts and charter schools is composed of uniform base grants by grade spans (K-3, 4-6, 7-8, and 9-12) and includes additional funding for targeted students. Under the previous K-12 finance system there was a transfer of revenue limit ADA funding, generated from the attendance in SDCs, from the unrestricted general fund to the special education program. Special day class ADA is no longer reported separately, and the CDE determined that this transfer will no longer take place. Therefore, the implementation of the LCFF has automatically increased the amount of many districts' unrestricted 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. It is no longer restricted special education revenue.

The district's special education contribution has increased by \$4,797,844 since 2014-15, or 35%.

The table below shows the special education revenue the district receives from both state and federal resources. The revenue data is based on district financial system reports provided to FCMAT. Since 2014-15 the district's revenue received to operate special education programs is projected to decrease by \$297,495, or 2.0%.

Special Education Revenues from 2014-15 to Projected 2016-17

Description	2014-15	2015-16	Projected 2016-17	Difference from 2014-15 to Projected 2016-17
IDEA Entitlement	\$3,087,574	\$3,106,460	\$3,110,550	+\$22,976
IDEA Mental Health	\$183,299	\$182,234	\$182,234	-\$1,065
State Mental Health	\$946,038	\$955,589	\$955,589	+\$9,551
Federal WorkAbility	\$170,676	\$184,537	\$187,976	+\$17,300
State WorkAbility	\$167,323	\$169,026	\$169,026	+\$1,703
Medi-Cal LEA Program	\$200,301	\$427,256	\$0	-\$200,301
Special Education Property Taxes	\$9,645,060	\$9,631,958	\$9,775,371	+\$130,311
AB 602 State Apportionment	\$233,068	\$209,832	\$219,213	-\$13,855
Special Education Transportation Apportionment	\$275,250	\$275,250	\$0	-\$275,250
LCI Hold Harmless	\$0	\$0	\$5,966	+\$5,966
Interagency Services	\$47,925	\$39,904	\$47,925	\$0
Work Incentive Training	\$3,559	\$4,199	\$13,758	+\$10,199
Other Local	\$5,630	\$7,394	\$600	-\$5,030
Total Revenues	\$14,965,702	\$15,193,637	\$14,668,207	-\$297,495

Source: District financial system data

Rounding used in calculations

School districts throughout the state face a continuing challenge in funding the costs to serve special education students. Districts are faced with mounting increases in the differences between

the federal and state government funding received and the mandated costs for these vital student services.

The table below shows the district's special education program expenditures. The expenditure data is based on the MOE documents provided to FCMAT. Since 2014-15 the district's expenditures to operate special education programs are projected to increase by \$4,972,900, or 17.0%.

*Special Education Expenditures from 2014-15 to Projected 2016-17**

Description	2014-15	2015-16	Projected 2016-17	Difference from 2014-15 to Projected 2016-17
Certificated Salaries	\$11,391,416	\$12,901,050	\$13,271,004	+\$1,879,589
Classified Salaries	\$6,340,842	\$7,259,137	\$7,449,649	+\$1,108,806
Benefits	\$3,921,535	\$4,617,073	\$4,921,055	+\$999,519
Materials and Supplies	\$342,688	\$292,461	\$177,899	-\$164,789
Services, Contracts and Operating	\$6,076,451	\$7,250,583	\$6,859,521	+\$783,070
Subtotal, Direct Costs	\$28,072,933	\$32,320,303	\$32,679,128	+\$4,606,195
Indirect Charges	\$1,161,764	\$1,556,527	\$1,528,469	+\$366,705
Total Expenditures	\$29,234,697	\$33,876,830	\$34,207,597	+\$4,972,900

Source: MOE documents

Rounding used in calculations

*Excludes the Program Cost Report Allocation

The table below shows the district's December 1 special education pupil count and the expenditures per identified pupil count. Since 2014-15 the district's special education pupil count is projected to increase by 11 pupils, or 0.6%, and the expenditures per special education pupil are projected to increase by \$2,452, or 16.4%.

Pupil Count and Expenditures per Pupil

Description	2014-15	2015-16	Projected 2016-17	Difference from 2014-15 to Projected 2016-17
December 1 Identified Pupil Count	1,950	1,961	1,961	+11 (+0.6%)
Expenditures per Pupil	\$14,992	\$17,275	\$17,444	+\$2,452 (+16.4%)

Source: DataQuest (district of service) and MOE documents

The table below reflects the district's expenditures for the county operated special education preschool program. Based on the financial documents provided, the district codes these expenditures to object classification 5100 and 5819 (services, contracts and operating costs). However, the district is not considered the district of service for the special education preschool students. The district reports the expenditures on its special education MOE but does not include the December 1 preschool pupil count. The county office is considered the district of service for the students on the December 1 pupil count. However, it does not report these students on its MOE because the preschool program expenditures are not included on its report.

The district needs to change its MOE report to either: 1) include the December 1 preschool pupil count and leave the expenditure coding in object classifications 5100 and 5819, or 2) code these expenditures to object classification 7142 (other tuition, excess costs, and/or deficit payments to county offices) if the December 1 preschool pupil count is not included. Because this reporting change will impact the district and SELPA-wide special education MOE, the district needs to work with the county office and the SELPA prior to making the change.

County Operated Special Education Preschool Program Expenditures

Description	2014-15	2015-16	Projected 2016-17	Difference from 2014-15 to Projected 2016-17
Object Code 5100/5819	\$2,641,701	\$3,073,649	\$2,753,155	+\$111,454 (+4.2%)

Source: District financial system data

The Special Education Department is responsible for developing the budget; however, staff reported concerns about a lack of timely communication regarding the budget process. For example, budget justification data for additional staffing needs is not always submitted timely. It would benefit the district for the Special Education and Business Services department administrators to meet monthly and discuss topics such as: budget development; budget monitoring; MOE requirements; NPS and NPA contracts, invoices and new placements; due process and complaint issues; identified student counts and student needs.

Recommendations

The district should:

1. Monitor its unrestricted general fund contribution through the annual MOE and determine if expenditures can be reduced using any of the exemptions allowed.
2. Establish routine meetings with the Special Education, Business Services and Human Resources departments to review special education staffing and ensure that staff is charged appropriately. For staff members who serve both students who have been identified for special education and those who have not, only the portion of their time spent serving identified students should be charged to the special education program.
3. Monitor attendance rates, including attendance rates in special day classes.
4. Review the expenditure coding for the special education preschool program operated by the county office, and work with the county office and SELPA to correct the MOE report.
5. Establish monthly meetings of the director of special education and the assistant superintendent of business services that include pertinent topics such as those described above.

Appendix

Appendix A

Study Agreement



CSIS California School Information Services

**FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
May 19, 2016**

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

1. BASIS OF AGREEMENT

The team provides a variety of services to local education agencies (LEAs). 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

1. Review the effectiveness of the district's inclusion model as the least restrictive environment. Include a review of the inclusion model's effect on the general education environment, the costs of the inclusion model as compared to a traditional service delivery, and both the general education and special education teacher workload that results from the inclusion model. Review the description, process and procedures, and professional development of the inclusion model, and make recommendations for improvement, if any.
2. Analyze special education teacher staffing ratios, class and caseload size using the statutory requirements for mandated services and statewide guidelines.

3. Review the efficiency of special education paraeducator staffing throughout the district. Review the procedures used to identify the need for paraeducators, and the processes for monitoring costs related to paraeducators and determining the need for continued support from year to year.
4. 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.
5. 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 align with those of districts of comparable size and structure. Include responsibilities of IEP administrative designee and functions of the position as it relates to the special education department staff roles and responsibilities. Compare the district's special education staffing and organization with that of three to six similar sized K-12 districts using the Ed Data website, or six districts selected by the district. Include recommendations to improve staffing and organizational efficiency and effectiveness, if any.
6. Review COE, NPS and NPA costs and placements, and make recommendations for improving the process for placement and cost efficiencies, if necessary.
7. Review the costs of due process, mediations, and settlements for the past three years and make recommendations for decreasing costs and improving alternative processes, if any.
8. Determine the district's unrestricted general fund contribution to special education and make recommendations for greater efficiency, if needed.

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 by the district within six to 12 months after completion of the study, FCMAT will return to the district at no cost 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. FCMAT will work with the district on a mutually convenient time to return for follow-up support that is no sooner than eight months and no longer than 18 months after completion of the study.

3. **PROJECT PERSONNEL**

The study team will be supervised by Michael H. Fine, Chief Administrative Officer, Fiscal Crisis and Management Assistance Team, Kern County Superintendent of Schools Office. The study team may also include:

<i>A. Diane Branham</i>	<i>FCMAT Chief Management Analyst</i>
<i>B. Don Dennison</i>	<i>FCMAT Consultant</i>
<i>C. Jackie Kirk-Martinez, Ed.D.</i>	<i>FCMAT Consultant</i>
<i>D. Jackie Martin</i>	<i>FCMAT Consultant</i>
<i>E. JoAnn Murphy</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, presenting reports and participating in meetings. The cost of independent FCMAT consultants will be billed at their actual daily rate for all work performed.

- 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 not-to-exceed cost of the study will be \$36,000.

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

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

5. RESPONSIBILITIES OF THE DISTRICT

- A. The district will provide office and conference room space during on-site reviews.
- B. The district will provide the following if requested:
 1. Policies, regulations and prior reports that address the study scope.
 2. Current or proposed organizational charts.
 3. Current and two prior years' audit reports.
 4. Any documents requested on a supplemental list. Documents requested on the supplemental list should be provided to FCMAT only in electronic format; if only hard copies are available, they should be scanned by the district and sent to FCMAT in electronic format.
 5. Documents should be provided in advance of field work; any delay in the receipt of the requested documents may affect the start date 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 and will be established upon the receipt of a signed study agreement:

Orientation:	October 18, 2016 at 9 a.m.
Staff Interviews:	October 18-19, 2016, 8:30 a.m. – 4:30 p.m.
Exit Meeting:	October 20, 2016 at 9 a.m.
Draft 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 field work, the district may terminate its request for service and will be responsible for all costs incurred by FCMAT to the date of termination under Section 4 (Project Costs). If the district does not provide written notice of termination prior to completion of 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

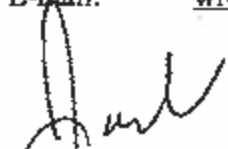
compensation as required under California state law. FCMAT shall provide certificates of insurance, with Napa Valley Unified School District named as additional insured, indicating applicable insurance coverages upon request.

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: J. Wade Roach, Assistant Superintendent, Business Services
Telephone: (707) 253-3533
Fax: (707) 975-6298
E-mail: wroach@nvusd.org



J. Wade Roach
Assistant Superintendent, Business Services
Napa Valley Unified School District

5/19/16

Date



Michael H. Fine
Chief Administrative Officer
Fiscal Crisis and Management Assistance Team

5/19/16

Date