



**CSIS** California School Information Services

# San Bernardino County Superintendent of Schools

## Juvenile Court School Review

January 12, 2018

**Michael H. Fine**  
Chief Executive Officer







CSIS California School Information Services

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January 12, 2018

Ted Alejandre, Superintendent  
San Bernardino County Superintendent of Schools  
601 North E Street  
San Bernardino, CA 92415

Dear Superintendent Alejandre:

On July 24, 2017, the San Bernardino County Superintendent of Education and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for management assistance. Specifically, the agreement states that FCMAT will perform the following:

1. Conduct a review of the organizational structure and staffing of the county's juvenile hall program, focusing on clerical support personnel, and make recommendations for staffing improvements or reductions, if any.
2. Review operational processes and procedures for the functions assigned to the juvenile hall program clerical support personnel and make recommendations for improved efficiency, if any.

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

FCMAT appreciates the opportunity to serve the San Bernardino County Juvenile Court School staff and extends thanks to its staff for their cooperation and assistance during this review.

Sincerely,

Michael H. Fine  
Chief Executive Officer

FCMAT

Michael H. Fine, Chief Executive Officer

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# About FCMAT

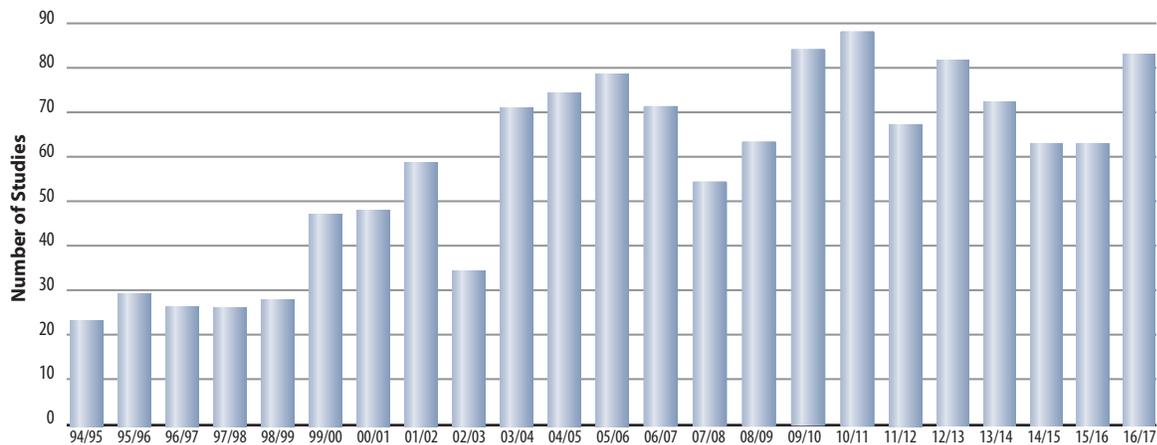
FCMAT’s primary mission is to assist California’s local K-14 educational agencies to identify, prevent, and resolve financial, human resources and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related 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](http://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 Michael H. Fine, Chief Executive Officer, with funding derived through appropriations in the state budget and a modest fee schedule for charges to requesting agencies.

# Introduction

## Background

San Bernardino County Superintendent of Schools (SBCSS) serves 33 school districts and operates multiple alternative educational programs.

In July 2017, SBCSS and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for FCMAT to provide management assistance to study the organizational structure, staffing, processes and procedures of the two detention center (juvenile court school) programs following concerns about declining enrollment in the juvenile court schools, and seeking assistance from FCMAT to review clerical staffing allocations and options to maximize organizational efficiency.

## Study and Report Guidelines

FCMAT visited staff at the county juvenile hall facility on October 12-13, 2017 to conduct interviews, collect data and review documents. This report is the result of those activities and is divided into the following sections:

- Executive Summary
- Findings and Recommendations
  - Overview of Juvenile Court Schools
  - Changes to Sentencing Laws
  - Juvenile Court School
  - Office of Civil Rights Review
  - Staffing
  - Clerical Work Assignments and Workflow
  - Data and Document Management
  - Recommendations
- 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. FCMAT's reports focus on systems and processes that may need improvement. Those that may function well are generally not commented on in FCMAT's reports.

## Study Team

The study team was composed of the following members:

Debi Deal, CICA, CFE  
Intervention Specialist  
Los Angeles, CA

Dominico Johnston  
FCMAT Consultant  
Merced, CA

Leonel Martínez  
FCMAT Technical Writer  
Bakersfield, CA

Each team member reviewed the draft report to confirm its accuracy and to achieve consensus on the final recommendations.

# Executive Summary

The San Bernardino County Office of Education (SBCSS) operates several alternative student programs in California's largest county geographically, covering 20,105 square miles. San Bernardino County borders Nevada and Arizona, and is contiguous with five counties as far north as Inyo County and south as Riverside County.

Juvenile court schools work in conjunction with county probation departments throughout the state; county office schools provide public education in detention facilities run by county probation departments for incarcerated students. The SBCSS juvenile court school operates in two separate detention and assessment facilities, one in Apple Valley (high desert) and one in San Bernardino.

According to Ed-Data.org, California had 67 juvenile court schools in 2016-17, a reduction of 13 since 2012-13. SBCSS has experienced significant reductions in program funding as an increasing number of incarcerated youth offenders have been placed in alternative settings because of justice reforms intended to reduce jail and prison populations through initiatives that focus on treatment and prevention. A reform movement starting in 2011 under pressure from the federal government shifted public policy, resulting in initiatives and referendums that reclassified nonviolent and nonserious felony convictions to misdemeanors, lowering incarceration rates and reprioritized state funding.

Like other county offices throughout the state, SBCSS struggles with revenue reductions due to declining enrollment and average daily attendance (ADA). The reaction to a decline in revenues to support the program is to reduce program expenditures or provide contributions from the general fund.

Management eliminated two full-time staff in response to a decline in revenue and made changes that reduced existing workload; however, an investigation by the Office of Civil Rights (OCR) found that SBCSS violated Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990. In response to the OCR findings, SBCSS agreed to implement the several organizational changes that subsequently increased the workload for case managers and clerical staff members.

This report will focus on the organizational structure and staffing for the SBCSS juvenile court programs and make recommendations for improved efficiency in operational processes and procedures. Key highlights include the following:

- How justice reform propositions passed by voters caused a decline in incarceration rates that ultimately affected county-operated juvenile court programs.
- The transient nature of juvenile court school populations and the impact on clerical staff.
- Results of the OCR review with agreed-upon mandates for program improvement.
- Duties and responsibilities of SBCSS clerical staff.
- Process and procedures using multiple operating systems that are not integrated with the core student data system.
- How a digital document management system will enhance efficiency and reduce clerical errors.



# Findings and Recommendations

## Overview of Juvenile Court Schools

Juvenile court schools are established to provide an instructional setting for incarcerated youth. Juvenile court schools in the state of California are operated by each county office of education. County offices work in partnership with county probation departments to ensure incarcerated youth receive instruction while detained. The schools serve students from age 14 through 18 who have been expelled from their school or entered the criminal justice system and are under the purview of the juvenile court system. The schools operate year-round and are required to provide a minimum of 240 minutes of instruction daily.

The juvenile court population is highly transient, primarily because of the variability in sentence length applied to students convicted of crimes. In the 2015-16 school year, the California Department of Education (CDE) reported a total statewide enrollment of 5,159 students in juvenile court schools, while *total students served* during the entire fiscal year was 25,987. This variance equates to approximately five times the number of students served statewide compared to the number enrolled on any given day as students rotate in and out of juvenile court schools.

From 2012-13 to 2016-17, statewide enrollment numbers at juvenile court schools declined by 45%, primarily because of the passage of two propositions intended to redirect juvenile offenders who committed nonserious and nonviolent crimes from county-operated facilities to community-based programs. Together, these justice reforms are the direct result of the federal government's demands to reduce prison populations in jails and prisons across California, and the desire to address the root cause of incarceration through treatment and prevention.

## Changes to Sentencing Laws

### Proposition 47

On November 4, 2014, California voters enacted Proposition 47 (Prop 47), the Safe Neighborhood and Schools Act, which affected felony-sentencing laws and convictions prior to its passage (i.e. retroactively). The purpose of Prop 47 was to reduce prison overcrowding and state fiscal expenses by reclassifying certain nonserious and nonviolent crimes from felonies to misdemeanors. This included crimes such as fraud, forgery, grand theft with a value \$950 or less, and most personal use of illegal drugs.

Following *Alejandro N. v. Superior Court of San Diego County* (2015) 238 Cal.App.4th 1209, the court found that the provisions of Prop 47 apply to juvenile offenders; therefore, the passage had a profound impact on juvenile court schools because the majority of crimes committed by juveniles involve property damage, larceny and drug possession. Having many of these crimes charged as misdemeanors rather than felonies provides judges greater flexibility in determining the time that should be served in a juvenile detention facility or through other avenues of rehabilitation.

The intent of the initiative is to redirect funds spent on these nonviolent offenders to K-12 schools, mental health and other community-based services. Although the majority of the funding is directed to adult offenders, in June 2017 the Board of State and Community Corrections allocated funding to 23 recipients throughout California including the San

Bernardino County Training, Education, Alcohol/Drug, Mental Health Treatment (T.E.A.M.) for wraparound services, such as extensive counseling and other support services, targeted at youth with a history of mental health issues or substance abuse.

### **Proposition 57**

On November 8, 2016, California voters passed Proposition 57 (Prop 57), California Parole for Non-Violent Criminals and Juvenile Court Trial Requirements Initiative. In part, this was in response to directives by the federal government to reduce the prison population. Prop 57 repealed Proposition 21 passed in March 2000, which granted sole authority for a prosecutor to decide if a youth offender was tried as a juvenile or an adult, shifting this authority back to a juvenile court judge.

Prop 57 amended the California Constitution to allow felons convicted of nonviolent crimes early release under certain circumstances and further provided that “juvenile court judges shall make determination, upon prosecutor motion, whether juveniles age 14 and older should be prosecuted and sentenced as adults for specified offenses.”

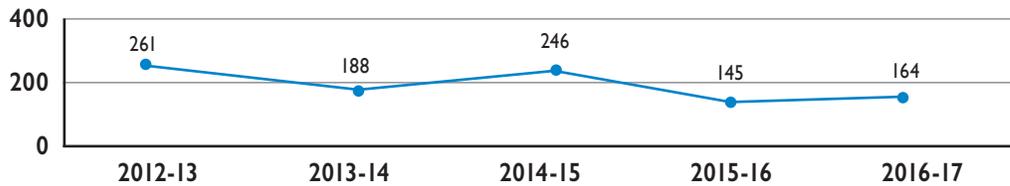
No longer could prosecutors automatically assign juvenile crimes to be tried in the more punitive adult court environment; instead youth offenders who committed nonviolent crimes were provided with opportunities for therapeutic rehabilitation through the juvenile court system. These opportunities included community-based youth engagement initiatives and early intervention programs such as wrap-around, restorative justice and residential placement, substantially reducing youth incarceration rates. These programs and initiatives are used in school districts and county office juvenile programs throughout California.

# Juvenile Court School

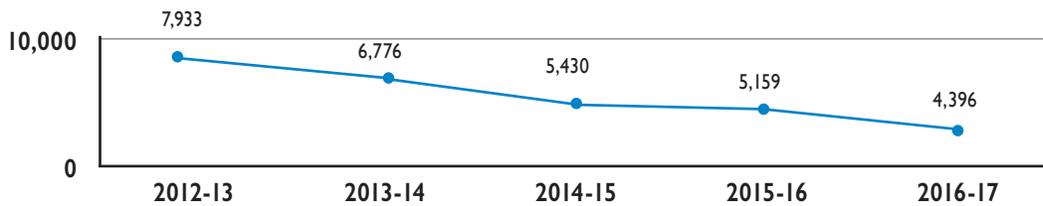
The Center on Juvenile and Criminal Justice report issued in May 2015, *Juvenile Justice in California*, (<https://oag.ca.gov/sites/all/files/agweb/pdfs/cjsc/publications/misc/jj15/jj15.pdf>) compared arrest rates for children under the age of 10 for 14 of California’s largest cities from 1990-2013. The report found that San Bernardino experienced “significant anomalies to both the rates and trends in arrests of younger children compared to other California jurisdictions” second only to Stockton. On average, San Bernardino had arrest rates eight times higher than that of the rest of the state for this population. However, over this period, average felony arrests were five times higher than in the comparison cities for children under 10, but only slightly “higher for all students under 18.” This report provides context for the discrepancy between statewide and SBCSS reductions in enrollment shown in the two charts below.

According to [www.Ed-Data.org](http://www.Ed-Data.org), from 2012-13 through 2016-17 SBCSS juvenile court schools have experienced a 37 % decline in enrollment whereas statewide data shows a 45% decline in enrollment.

***SBCSS Juvenile Court School Enrollment***



***California Statewide Juvenile Court Schools Enrollment***



Unlike traditional schools, the transient nature of juvenile court school populations and the associated recordkeeping requirements are the main factors that must be considered when comparing a decline in enrollment and a potential reduction in staffing.

Students transfer into and out of juvenile court schools daily. Over the course of one year, enrollments and total number of students served average five times the actual enrollment on any given day. Total students served measures the total number of students that transfer in and out of the school during the year as well as those who stay.

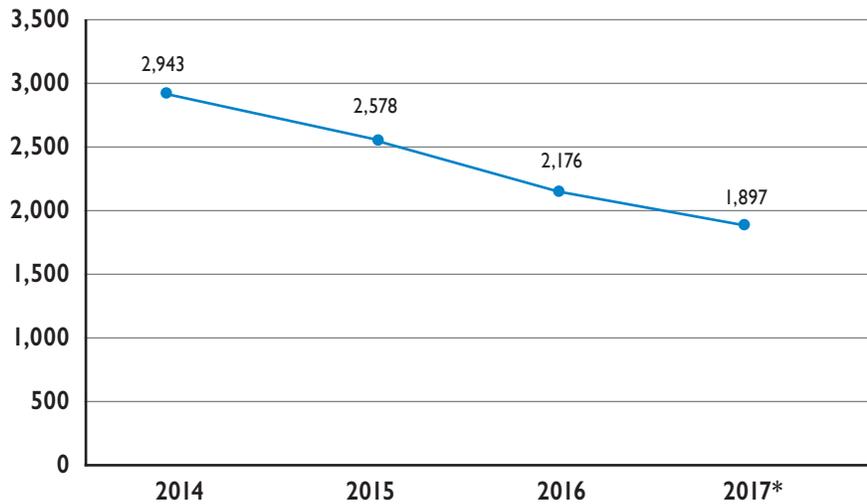
Staff interviews confirm that the average length of a student’s stay in the juvenile court school environment has changed dramatically. While statewide recidivism rates for repeat offenders have declined further than SBCSS, the SBCSS juvenile court school experiences shorter stays and higher recidivism rates for nonserious and nonviolent youth offenders.

The report from the Center on Juvenile and Criminal Justice cites significantly higher rates and trends in arrests of younger children in Stockton and San Bernardino compared to other California communities. These anomalies may be in part because, unlike in other jurisdictions, school district's officers in these cities have the authority to arrest students.

On a typical day during October 2017 sampled by FCMAT, the SBCSS juvenile court school had five releases and 11 new students. Each student exiting or entering the juvenile court school must be tracked and processed through multiple systems that are not integrated, which will be described later in this report. Each student is given a class assignment that is carefully selected to ensure that the student is placed in a proper environment in accordance with their individualized educational needs and other factors, including gang affiliations.

SBCSS's juvenile court school's declining enrollment is proportional to the decline in total students served. A comparison of data from 2014 through 2017 indicates that the decline in both enrollment and total students served is estimated at 35.5%.

*SBCSS Juvenile Court School - Total Students Served*



\*Total has been annualized based on data up to October 4, 2017

## Office of Civil Rights Review

In August 2016, the U.S. Department of Education, Office of Civil Rights (OCR) and SBCSS entered into an agreement to resolve compliance issues pertaining to students with disabilities in alternative and juvenile court schools. The OCR investigation found that SBCSS violated Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990.

The following findings from the OCR report include violations of Section 504 and Title II:

- Lacked an adequate system to identify and evaluate students with suspected disabilities.
- Failed to comply with the legal requirement to conduct an individualized determination of student needs for students with disabilities.
- Provided a fixed predetermined amount of specialized instructional time that a student would receive, automatically reducing any higher service levels provided for in individual student special education plans.
- Failed to implement the specialized instruction and related services, such as speech therapy, required in existing student individualized education programs (IEPs), and did not have a system to track service provision or provide make-up services to students when services were not provided.
- Failed to have a reliable system for monitoring evaluation and reevaluation requests and the receipt of records from transferring districts that identify students with disabilities and required services.
- Failed to have a reliable system for recording records from transferring districts that identify students with disabilities and required services.
- Failed to train staff on the requirements related to Section 504 and how to identify and develop plans for accommodating and providing aids and services to students with disabilities identified under Section 504.
- Relied on paraeducators instead of special education case managers to provide specialized instruction to students with disabilities.

Based on these findings, SBCSS agreed to implement the following organizational changes:

- Implement a standard recordkeeping system for timely provision of records for students entering and exiting its schools and to ensure procedural requirements related to identification, evaluation, reevaluation, placement, and service implementation are met.
- Hire a qualified project manager to work with the county to develop a needs assessment and action plan for addressing the issues identified with implementation of IEP/Section 504 plans, related service and instruction delivery by qualified staff, record keeping, and provision of appropriate placements to meet students' individualized needs.
- Develop a comprehensive monitoring and assessment system for special education and related services placement and service delivery in the county's community and court schools in coordination with the project manager.
- Review existing IEPs of current students to assess whether IEP/Section 504 plans were changed improperly without following proper procedures and convene a placement team

meeting to assess provision of compensatory education services to address identified needs.

- Revise policies and procedures to ensure they are consistent with Section 504 and Title II and their implementing regulations, conduct training for paraeducators regarding their duties and responsibilities, and convene a joint meeting between special education program staff and county and community school staff to improve service provision for students with disabilities.

While SBCSS has addressed each of these findings, management continues to enhance and integrate operating systems and make continuous improvement. SBCSS will remain under OCR review until all the items above have been satisfactorily addressed.

A report by the CDE dated July 2016 and titled *Juvenile Court Student Transition Statewide Work Group Report and Recommendations to the Legislature* included statewide findings similar to those in the OCR report and issued nine recommendations to improve the transitioning of students from juvenile court schools to public schools. The group, consisting of statewide stakeholders, focused on communication between county offices, county probation and school districts and the immediate transfer of student records that are complete and accurate.

The OCR findings and resolutions have had a direct impact on the juvenile court school clerical workload. To resolve the findings, clerical staff duties expanded, with emphasis on the accuracy and timeliness of acquiring student records; record documentation and storage; and record review.

Timeliness in the acquisition of student records when students are processed into the juvenile court school is critical to ensuring each student is provided with the appropriate instruction necessary to achieve graduation. In addition, the transient nature of each student's stay is variable based on the discretion of the judge and given sentencing guidelines and other remediation options available. Student transcripts and IEPs must be obtained promptly from previous schools to ensure compliance with OCR. To ensure the most current records are obtained, clerical staff often request these documents from multiple districts and sites, making repeated requests until the records are obtained. However, staff reported that in several instances a student was released by the time records were obtained.

To ensure and demonstrate compliance with the changes outlined in the OCR report, management emphasized electronic document storage for the student records database. The student record system, Promis, requires additional documentation that must be scanned for each student, which takes more processing time.

Once the necessary student documents have been acquired and cataloged in Promis, clerical staff review the accuracy and completeness of the documentation. This is done to ensure a student's educational plan is based on the most current and accurate information.

## Staffing

The decline in enrollment and ADA has decreased funding while mandates from the OCR have augmented workload. In reaction to funding changes, management reduced clerical staff that support the juvenile court school without consideration of new mandates identified in the OCR report, recommendations by CDE, or changes in the judicial system. These changes effectively reduced the length of student stays, but increased the total number of students that rotate in and out of the juvenile court school on shorter durations throughout the school year; this created additional workload responsibilities for case managers and clerical staffs.

In addition to these factors, one of the two SBCSS juvenile court schools closed for essential remodeling for six months in 2016. During the construction, all high desert staff were temporarily relocated to the main facility in San Bernardino. During this time, clerical staff was reduced through attrition and reassignments, and duties were redistributed.

Two clerical full-time year-round equivalent positions were eliminated: an office specialist I at the high desert facility and an office specialist II at the San Bernardino facility. This left the main facility juvenile court campus with three data entry clerks. One office specialist II remains at the high desert juvenile court location.

| Staffing – Preremodel<br>Spring 2016 |                      | Staffing Post-Remodel<br>Summer 2016 |                      |
|--------------------------------------|----------------------|--------------------------------------|----------------------|
| San Bernardino Facility              | High Desert Facility | San Bernardino Facility              | High Desert Facility |
| Office Specialist II                 | Office Specialist II | Data Entry Clerk                     | Office Specialist II |
| Data Entry Clerk                     | Office Specialist I  | Data Entry Clerk                     |                      |
| Data Entry Clerk                     |                      | Data Entry Clerk                     |                      |
| Data Entry Clerk                     |                      |                                      |                      |

In response to the OCR report, management implemented two changes designed to reduce clerical workload at the juvenile court division. First, management authorized a transition plan for the student data system from File Maker Pro to Promis. The transition to one system occurred during the 2016-17 school year and reduced duplicate data entry into both systems. Second, management realigned workload between clerical staff at the SBCSS community schools and the SBCSS juvenile court division, further reducing the workload of the juvenile court clerical staff.

Enrollment and ADA continue to decline at both SBCSS facilities. Many county offices throughout the state are experiencing similar declines and have closed facilities and/or contracted with other county offices to provide juvenile court school services. It would benefit SBCSS to consider closing the high desert facility and combining the entire juvenile court school operation at the San Bernardino facility.

## Clerical Work Assignments and Workflow

Once construction at the high desert facility was complete, staff returned to their original workplace. However, each staff member retained the duties assigned in the realignment that occurred because of staff reductions while housed at the San Bernardino facility. For example, the office specialist II was assigned responsibility for ordering supplies, maintenance and operations work orders, timesheets, travel requests and print shop orders for both locations. It would benefit SBCSS to reassign clerical duties for each site to increase efficiency and reduce the amount of time required to process information to and from sites.

Currently, one staff member enters account codes. When possible, account codes used for routine items, such as supplies, should be limited to one or two account strings and given to all staff members who are responsible for ordering supplies and arranging for travel conferences. This would reduce the time spent by clerical staff when entering account codes, reduce the likelihood of errors, and allow a greater number of staff members to be responsible for completion of the documents.

The office specialist II tracks expenses using a spreadsheet; this should not be necessary if the staff have access to the county's financial system and receive adequate training. It is a best practice to use the agency's financial system for reporting on financial matters. Independently tracking expenses apart from the financial system increases workload, creates duplication and increases the likelihood of inaccuracies. Management should determine if clerical staff can access the financial reports as needed or if financial reports can be sent regularly from the business office. This practice should be evaluated.

The main staffing responsibilities fluctuate slightly between the two detention centers, primarily because one full-time clerical position in the high desert facility performs duties that exceed the position's classification, whereas the San Bernardino clerical staff duties are consistent with the current job classification. It would benefit SBCSS to consider a higher classification for the high desert position due to the complexity of duties. The following are currently considered the main duties and responsibilities of clerical classifications.

### Office Specialist II

- Performs centralized telephone reception. Primarily routes calls to probation staff (not affiliated with the county office) and other county office staff members.
- Handles student records requests from school districts, county probation and parents/guardians.
- Completes the initial intake form (known as the blue form) upon new student arrival and updates any changes in student data or placement in the CALPADS system.
- Reviews CALPADS data for accuracy.
- Arranges for substitute coverage, placement and feedback.
- Processes requests for service and goods for the main facility and high desert facility:
  - Prepares purchase requisitions.
  - Maintains and operates work orders.
  - Collects timesheets and processes them for authorization.
  - Authorizes travel and reimbursement.

- Completes print shop orders.
- Updates an expense tracking sheet for each site and funding source

### Data Entry Clerks

- Receives daily list of enrolled students report from county probation.
- Updates daily student list for new students and exiting students for juvenile court case managers.
- Updates CALPADS with new or revised intake (blue) student enrollment forms.
- Obtains student transcripts from districts.
- Updates Promis student data system with student information.
- Updates multiple systems: Web IEP, Web DA and Promis based on a daily probation in/out student activity report.
- Handles transcript requests from districts, probation and parents.

Clerical staff frequently request student transcripts, IEP and immunization records from other educational agencies. A student has often been enrolled in multiple schools and school districts. Promptness is important because the student demographic is highly migratory. Necessary records for the continuance of IEP support or proper student placement for grades levels are not always received in a timely manner and are sometimes received after the student exits juvenile court school.

A considerable amount of time is devoted to requesting transcripts, student IEPs and immunization records, yet neither juvenile court school site has a registrar. Requesting student records is a function of a registrar and is not included in the data entry clerk or office specialist job descriptions. The SBCSS central office has a registrar position, but it is not located in the juvenile court school division. It would benefit SBCSS to consider reassigning this function to a registrar and centralizing this function for all county-operated programs. This would allow security protocols for privacy of student data to be better managed and increase efficiency of operations.

The juvenile court school and county probation units do not have an automated telephone system. All telephone calls for these two units are routed to the office specialist II. Staff report that the majority of calls are for probation, not the school. Time spent answering telephone calls and rerouting them interrupts workflow, and parents and/or guardians often have many questions that staff cannot address. An automated telephone system with separate telephone numbers for juvenile court school and county probation could help resolve these issues.

Two special education case managers are cross trained to process student IEPs. According to records provided to FCMAT, there were 102 completed IEPs in 2015; 130 in 2016; and 63 in the first three months of 2017. However, staff prepared and provided to FCMAT a sample based on three months of data between July 2016 through June 2017, and FCMAT extrapolated this over 12 months to determine that staff processed approximately 489 addenda to existing IEPs.

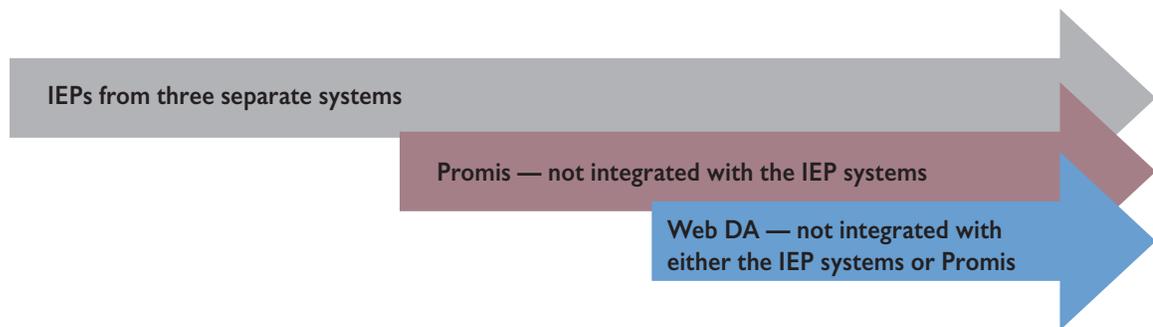
To put this into perspective, three separate and independent web-based IEP systems are used at the county special education local plan area's (SELPA's) three separate locations. Two are compatible with each other, the third is a stand-alone system, and none of the three interfaces with Promis, the core student database system. As a result, clerical staff perform the following steps:

1. Upload the student IEP document

2. Save to the hard drive
3. Open the Promis program
4. Locate the student in Promis
5. Search the hard drive for the correct student file
6. Upload the student IEP record into Promis

Each student requires proper grade level placement and appropriate student services in accordance with current IEPs; therefore, time is of the essence in receiving student records from other agencies and allowing staff to access these records in the Promis system.

The possibility of clerical errors increases with each manual step. The following diagram shows the process to input IEP data from each of the IEP software systems into Promis and finally into Web DA and demonstrates the need for a document management software application or a fully functional student data system, which is fully described in the next section of this report.



Once the IEP is uploaded as described in Promis, staff must open a separate program, WEB DA, for the district attorney's office, and manually enter the same IEP data a second time. Because WEB DA does not interface with any of the three county IEP systems, this manual function is inherently prone to reporting errors, time delays and lacks efficiency. Management needs to immediately contact Promis to explore ways to integrate WEB DA with Promis to avoid duplicate data entry, reduce the potential for errors and ensure timely processing of essential information to the district attorney's office. In addition, the it would benefit the county to use one web-based IEP system. This would allow case managers and clerical staff to access one system in which all the student IEPs reside and that is fully integrated with the student data system and the district attorney's office.

## Data and Document Management

SBCSS juvenile court school staff use multiple software applications that do not interface, as described throughout this report. Ideally, one student information system that can be accessed by a variety of users and that interfaces with one IEP system that can automatically upload key pieces of information into the Web DA system would be the best solution. It would be beneficial for SBCSS management to investigate whether the current student information system (Promis) can be programmed to integrate with multiple software applications currently used. If this is not possible, then management should investigate and implement a digital document management system with interactive input forms accessible by case managers and clerical staff. Management should ensure that read/write security protocols are designed for appropriate access.

The ability of the juvenile court school to meet OCR mandates and operate more effectively and efficiently with its current staffing allocations hinges on creating systems that are integrated and reduce unnecessary and/or duplicative tasks. Implementing a digital document management software application would create a document library where forms would be processed quickly, greater consistency of service could be achieved, and student privacy could be maintained.

With the assistance of the county office's Information Technology Department, the juvenile court school should establish a team to identify all forms used to record and transmit student and other data assembled by clerical staff. The first group of forms to be developed into a digital interactive format should be prioritized based on frequency of use and the amount of data captured. Electronic interactive forms should be consolidated whenever possible to avoid duplicate data entry. Depending on the number of forms identified, a phase-in process should be established, and timeline developed for implementation. Forms with frequent usage and critical information, such as the intake (blue) student enrollment form, should be a priority.

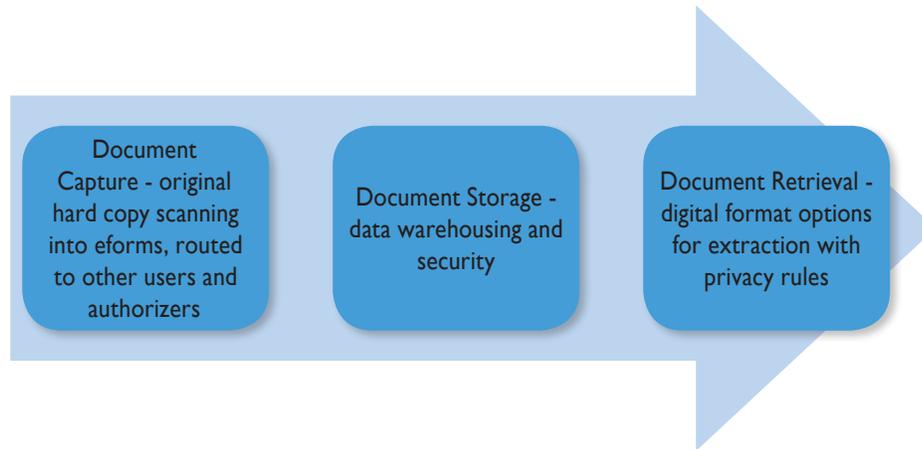
In conjunction with the development of digital forms, an automated internal routing system would help streamline the transmission of documents from staff members to update, approve, and/or store data on each applicable form. Routing will ensure the proper recipient receives only the documents they require, all documents can be tracked throughout the system, and security for student privacy is maintained. The queues that hold the documents will serve as a dedicated repository rather than a desk or email inbox that is used for a variety of competing needs.

A review of forms used for data capture and transmission should be completed before or during the implementation of an electronic document management system. In particular, a process flow of documents used to record student data needs to occur. By reviewing each step in the document's life cycle, areas of redundancy can be identified and eliminated in the document's physical form and when it is developed in an electronic format.

By identifying a document's process flow, the stops along an electronic route the document follows will be recognized. Identifying the users that need to access, update or approve information will serve as a general framework when the document's electronic route is developed.

When conducting the form evaluation, the intake (blue) form used to capture student enrollment data should be assessed for new versus existing student information. Current practice and usage of the form calls for all information fields to be completed, regardless of whether the student is a new enrollee or an existing student. A large amount of data is recorded on the form for new students; therefore, inputting this same information for a returning student is redundant. To remedy the situation, creating a section for the user completing the form to denote whether the student is new or returning can prompt the user to complete only pertinent sections that require additional input.

The diagram below provides a visual concept of how data can be entered into the system by the initial user through an electronic interactive form. Once this process is complete, the document automatically routes to predefined users, who add information and/or initiate approval. Once processing occurs with the last user, the document is stored in a secured environment where the data can be accessed, retrieved or printed depending on need and use.



Several document management software applications are available that provide digital solutions for document tracking and storage from centralized interface systems to web-based environments, allowing users real-time access and retrieval of needed information. SBCSS should research various document management software application for immediate implementation.

## Recommendations

*The county office should:*

1. Reassign clerical duties for ordering supplies and travel requests for each of its two sites for better efficiency.
2. Consider a higher classification for the high desert position due to the complexity of duties performed by a single staff member performing job duties outside of the current classification.
3. Limit account codes used for routine items, such as supplies, to one or two account strings, and provide them to all staff members who are responsible for ordering supplies and arranging for travel and conferences.
4. Study the possibility of closing the high desert facility and combining the entire juvenile court school operation at the San Bernardino facility.
5. Determine if clerical staff can access the financial system to run site reports as needed or if financial reports can be sent from the business office regularly, instead of tracking expenditures in a system spreadsheet.
6. Consider reassigning requests for student records to a registrar and centralizing this function for all county-operated programs.
7. Evaluate the feasibility of installing an automated telephone system with separate telephone numbers for juvenile court school and county probation.
8. Use one web-based IEP system to enable case managers and clerical staff to access one system in which all the student IEPs reside.
9. Investigate whether the current student information system (Promis) can be programmed to integrate with multiple software applications currently used. If this is not possible, then management should investigate and implement a digital document management system with interactive forms, ideally by taking the following steps:
  - Complete an inventory of the forms used for data capture and transmission before or during the implementation of a digital document management software application.
  - Develop a process flow of documents used to record student data.
  - Establish a team to identify all forms used to record and transmit student and other clerical data.
  - Develop a phase-in process and timeline for implementation of digital forms, focusing on those that are frequently used and that include critical information such as the intake (blue) student enrollment form.
  - Create an automated internal routing system to streamline the routing of documents to and from staff members who need to update, approve, and/or store data on each form.



## Subsequent Events

Following FCMAT's fieldwork and as this report was being written, the county office implemented adjustments based on FCMAT's initial observations as follows:

1. The county office reassigned clerical duties for ordering supplies and travel requests for each of the two court school sites for greater efficiency.
2. The county office established a Student Services Registrar Technician School Support Technician position at the high desert facility. This position has been advertised.
3. The central office has created a reference sheet for common account codes to assist the clerical staff with ordering routine supplies.
4. The newly developed SST position will have authorization to access the financial system and run site financial reports.
5. An automated telephone system was installed at both juvenile court school offices.
6. Two of the three WEB IEP systems were merged.
7. The county office is forming a team to review and make recommendations for a digital document management system with interactive forms to streamline internal routing of documents to and from staff members who need to update, approve and store student information.



# Appendix

## Study Agreement





CSIS California School Information Services

**FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM  
STUDY AGREEMENT  
July 24, 2017**

The Fiscal Crisis and Management Assistance Team (FCMAT), hereinafter referred to as the team, and the San Bernardino County Superintendent of Schools, hereinafter referred to as the COE, mutually agree as follows:

**1. BASIS OF AGREEMENT**

The team provides a variety of services to local educational agencies (LEAs). The COE has requested that the team assign professionals to study specific aspects of the county 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.

**2. SCOPE OF THE WORK**

**A. Scope and Objectives of the Study**

1. Conduct a review of the organizational structure and staffing of the county's juvenile hall program, focusing on clerical support personnel, and make recommendations for staffing improvements or reductions, if any.
2. Review operational processes and procedures for the functions assigned to the juvenile hall program clerical support personnel and make recommendations for improved efficiency, if any.

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

1. Orientation Meeting - The team will conduct an orientation session at the COE to brief COE 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 COE 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 COE 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 COE’s administration for review and comment.
6. Final Report - Electronic copies of the final report will be delivered to the COE’s administration following completion of the review. The final report will be published on the FCMAT website. Printed copies are available from FCMAT upon request.
7. Follow-Up Support – If requested by the COE within six to 12 months after completion of the study, FCMAT will return to the COE at no cost to assess the COE’s progress in implementing the recommendations included in the report. Progress in implementing the recommendations will be documented to the COE in a FCMAT management letter. FCMAT will work with the COE on a mutually convenient time to return for follow-up support that is no sooner than eight months and no later than 18 months after the completion of the study.

### 3. **PROJECT PERSONNEL**

The FCMAT study team may also include:

- |           |                         |                         |
|-----------|-------------------------|-------------------------|
| <i>A.</i> | <i>To be determined</i> | <i>FCMAT Staff</i>      |
| <i>B.</i> | <i>To be determined</i> | <i>FCMAT Consultant</i> |

### 4. **PROJECT COSTS**

The cost for studies requested pursuant to Education Code (EC) 42127.8(d)(1) shall be as follows:

- A. \$650 per day for each staff team member while on site, conducting fieldwork at other locations, presenting reports, or 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 COE 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 COE's acceptance of the final report.

**Based on the elements identified in section 2A, the total not-to-exceed cost of the study will be \$9,500.**

- 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 located at 1300 17<sup>th</sup> Street, City Centre, Bakersfield, CA 93301.

## **5. RESPONSIBILITIES OF THE COE**

- A. The COE will provide office and conference room space during on-site reviews.
- B. The COE 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 COE and sent to FCMAT in electronic format.
  5. Documents should be provided in advance of fieldwork; any delay in the receipt of the requested documents may affect the start date and/or completion date of the project. Upon approval of the signed study agreement, access will be provided to FCMAT's online SharePoint document repository, where the COE shall upload all requested documents.
- C. The COE'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 COE 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:

|                                      |                                       |
|--------------------------------------|---------------------------------------|
| <i>Orientation:</i>                  | <i>to be determined</i>               |
| <i>Staff Interviews:</i>             | <i>to be determined</i>               |
| <i>Exit Meeting:</i>                 | <i>to be determined</i>               |
| <i>Preliminary Report Submitted:</i> | <i>to be determined</i>               |
| <i>Final Report Submitted:</i>       | <i>to be determined</i>               |
| <i>Board Presentation:</i>           | <i>to be determined, if requested</i> |
| <i>Follow-Up Support:</i>            | <i>if requested</i>                   |

## 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 COE and any other parties from which, in the team's judgment, it must obtain information. Once the team has completed its fieldwork, it will proceed to prepare a preliminary draft report and a final report. Prior to completion of fieldwork, the COE 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 COE does not provide written notice of termination prior to completion of fieldwork, the team will complete its work and deliver its report and the COE will be responsible for the full costs. The COE 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 COE 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 COE. 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 COE in any manner without prior express written authorization from an officer of the COE.

## 9. INSURANCE

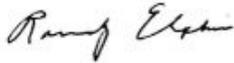
During the term of this agreement, FCMAT shall maintain liability insurance of not less than \$1 million unless otherwise agreed upon in writing by the COE, automobile liability insurance in the amount required under California state law, and workers compensation as required under California state law. FCMAT shall provide certificates of insurance, with San Bernardino County Superintendent of Schools named as additional insured, indicating applicable insurance coverages upon request.

**10. HOLD HARMLESS**

FCMAT shall hold the COE, 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 COE 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**

Contact person: Violet Gutierrez  
 Telephone: (909) 386-9584  
 E-mail: [violet.gutierrez@sbcss.net](mailto:violet.gutierrez@sbcss.net)



July 25, 2017

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Randy Elphic  
 Assistant Superintendent of Student Services  
 San Bernardino County Superintendent of Schools

Date



July 24, 2017

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

Date