



CSIS California School Information Services

Coalinga-Huron Joint Unified School District

Special Education Review

May 18, 2018



Michael H. Fine
Chief Executive Officer





May 18, 2018

Lori Villanueva, Superintendent
Coalinga-Huron Joint Unified School District
657 Sunset Street
Coalinga, CA 93210

Dear Superintendent Villanueva:

In October 2017, the Coalinga-Huron Joint Unified School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for a review of the district's special education program. Specifically, the agreement states that FCMAT will perform the following:

1. Review the district's implementation of student success team, Response to Intervention, and Multi-Tiered System of Supports, and make recommendations for improvement, if any.
2. Analyze special education teacher staffing ratios, class and caseload size using statutory requirements for mandated services and statewide guidelines and make recommendations for improvement, if any.
3. Review the efficiency of staffing allocations of special education paraeducators and make recommendations for improvement, if any. Review the procedures for identifying the need for paraeducators and the processes for monitoring the assignment of paraeducators and determining the ongoing need for continued support from year to year. (Include classroom and 1:1 paraeducators.)
4. Analyze staffing and caseloads for related service providers, including but not limited to: speech pathologists, psychologists, occupational/physical therapists, behavior specialists, adaptive physical education and other staff who may be designated DIS, and make recommendations for improvement, if any.
5. Determine whether the district overidentifies students for special education services compared to the statewide average, and make recommendations that will reduce over identification, if needed.
6. Analyze whether the district provides a continuum of special education and related services from preschool through 22 years of age, including student placements in the least restrictive environments, and make recommendations for improvement, if any.

FCMAT

Michael H. Fine, Chief Executive Officer

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7. Review the organizational structure and staffing of the special education department in the district's central office to determine whether clerical and administrative support staffing are aligned with those of districts of comparable size and structure and make recommendations for greater efficiencies, if needed.
8. Review the district's unrestricted general fund contribution to special education and make recommendations for greater efficiency, if any.

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

FCMAT appreciates the opportunity to serve the Coalinga-Huron Joint Unified School District and extends thanks to its staff for their cooperation and assistance during this review.

Sincerely,

A handwritten signature in black ink that reads "Michael H. Fine". The signature is written in a cursive, flowing style.

Michael H. Fine
Chief Executive Officer

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About FCMAT

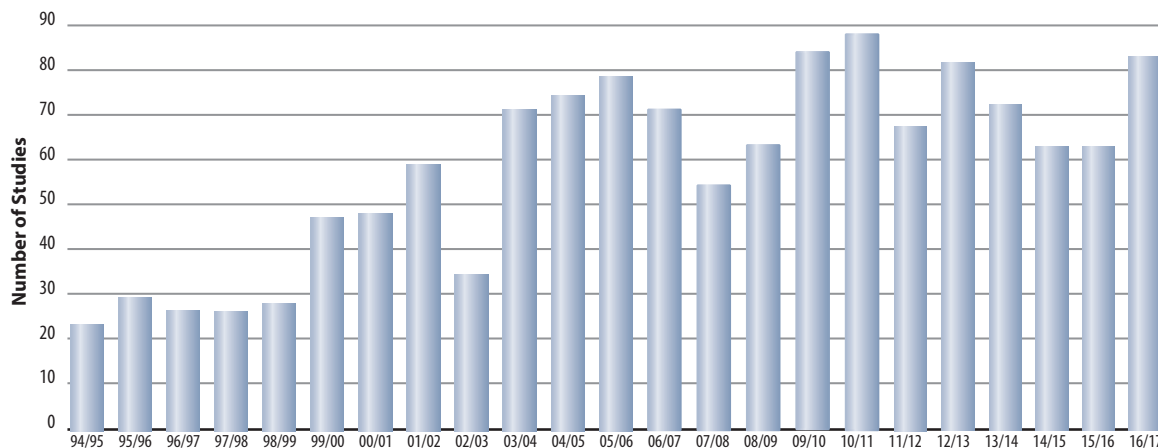
FCMAT's primary mission is to assist California's local K-14 educational agencies to identify, prevent, and resolve financial, human resources and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related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

The Coalinga-Huron Joint Unified School District is located in Fresno County with student attendance boundaries that also encompass portions of San Benito and Monterey counties. The district has a five-member governing board and serves approximately 4,450 students at five elementary, two middle, one comprehensive high, two continuation high, and one community day schools. According to data from the California Department of Education (CDE), student enrollment has slightly increased each school year since 2011-12.

The district is part of the Fresno County Special Education Local Plan Area (SELPA), and according to 2016-17 data from the CDE, 504 students from birth through age 22 who reside in the district are identified as having special needs.

In October 2017 the 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 December 7-8, 2017 to conduct interviews, collect data and begin reviewing documents. Following fieldwork, FCMAT continued to review and analyze documents. This report is the result of those activities and is divided into the following sections:

- Executive Summary
- Response to Intervention/SST/MTSS
- Special Education Teacher and Instructional Assistant Staffing
- Related Service Provider Staffing
- Identification Rate
- Continuum of Services
- Organizational Structure
- Fiscal Contribution
- Appendix

FCMAT's reports focus on systems and processes that may need improvement. Those that may be functioning well are generally not commented on in FCMAT's reports. 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 accuracy and achieve consensus on the final recommendations.

Executive Summary

The district provides a complete continuum of services for special education students as described in the Fresno County SELPA Local Plan and as required by state and federal regulations. However, staff reported that at some sites, special education is one of the only avenues for students to receive additional support.

Identification of special needs students is influenced by a district's implementation of general education supports such as student study teams/student success teams (SSTs), Response to Instruction and Intervention (RtI²), and a Multi-Tiered System of Supports (MTSS). The district has adopted board policies on RtI² and SSTs; however, it has a site-based rather than a districtwide RtI² process. Interviews with staff indicated that implementation differs from site to site. Sites do not consistently use the SST process, and staff indicated that numerous written requests are received from parents for assessment in lieu of the SST. In some cases, staff have not had a chance to consider interventions through RtI² before a student is considered for special education eligibility. RtI², SSTs and MTSS should be consistently implemented at all sites, and training should be provided to all applicable staff, with the Educational Services Department leading and monitoring the processes and procedures.

Since 2014-15, the district's enrollment has increased by approximately 2%, but the special education identification of students with individualized education programs (IEPs) has increased by approximately 30%. The statewide special education identification average is 10.7%, and the district's 2017-18 identification rate is 11.5%. The district's identification rate by disability compared to the county and state averages is significantly over the average in the percentage of students with a specific learning disability (SLD). This possible overidentification may be due to several factors, including lack of general education intervention under the RtI² model, English language learner proficiency versus a defined SLD, and overuse of the Individuals with Disabilities Education Act (IDEA) eligibility criteria. These issues should be researched and analyzed to determine if the SLD identification is accurate. The district should also review assessment requests and determine if general education interventions are appropriate before assessment for special education.

FCMAT's analysis of special education teacher caseloads indicates that, based on Education Code caseload requirements, the district is overstaffed by 3.7 full-time equivalent (FTE) resource specialist positions. Based on industry standards, special day classes (SDCs) are slightly overstaffed; however, because of the large distance between the Coalinga and Huron schools and grade level configurations, it does not appear feasible to reduce teacher staffing in SDCs. The district should review resource specialist program (RSP) teacher staffing and determine if staffing can be reduced. It should also routinely review all special education teacher caseloads to ensure that it maintains maximum staffing efficiency while fully implementing IEPs and meeting students' needs.

According to industry standards, the district is slightly overstaffed in classroom instructional assistants in some programs, such as SDCs and preschool, but is understaffed in the adult transition program. Additional classroom staff is sometimes necessary because of specific needs, and the district should routinely review instructional assistant staffing, including 1-to-1 aides, and determine appropriate and equitable staffing needs.

The district does not use a formal procedure, typically known as the special circumstance instructional assistance (SCIA) assessment, to determine if additional classroom or specific

student support is needed. An SCIA evaluation should be used to determine if a student requires additional assistance throughout the day, or whether a class may warrant additional support above the industry standard. In addition, there is no process to monitor progress, related IEP goals for student independence or a fade plan to systematically plan for a reduction of intensive supports. The district should develop and utilize a SCIA assessment process, provide professional development for its use, and ensure an individual transition or “fade” plan with specific goals is developed in each IEP that provides for an SCIA.

FCMAT’s analysis of related service provider staffing indicates that, based on Education Code caseload requirements, the district is understaffed by approximately 1.0 FTE speech and language pathologist (SLP). The district should audit SLP caseloads to determine how many students exit speech services and how much support students receiving indirect speech services require, and then review the SLP caseloads and staff to statutory requirements. If the district cannot locate and retain an additional SLP, it should strongly consider using “telepractice (remote video)” speech services. District SLP services are provided to four students who are parentally placed in private schools. Most districts provide consultation services to the private school staff monthly or quarterly, but not direct services to private school students. The district should review this practice and ensure it follows the Fresno County SELPA’s proportionate share procedures.

According to industry standards, the district is understaffed 0.6 FTE school psychologist position in addition to the full-time position that is vacant. It is also overstaffed 1.9 FTE nurses. The district should review and routinely monitor related service provider caseloads to determine if staffing is adequate for its needs and increase or decrease staff accordingly.

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 considered. 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 appropriately staffed, and clerical support positions are slightly understaffed. The district should review the amount of clerical work in the Special Education Department and ensure that it is staffed appropriately.

The Special Education Department needs strong leadership to ensure that the program operates efficiently and effectively. Interviews indicated that the department is perceived as reactive rather than proactive and that communication from the director of special education does not occur or is delayed and frequently inconsistent. The district should establish standards for effective communication with the Special Education Department and ensure that they are implemented and monitored.

Principals and staff lack essential training in methods, assessment, behavior management and IEP writing/case management, and staff throughout the Special Education Department expressed a need for professional development. There are no opportunities for job-alike meetings for teachers or related service providers, and the director of special education does not routinely conduct staff meetings. Such meetings are necessary to discuss special education topics such as new regulations and procedural changes.

Because communication is lacking between the Human Resources and Special Education departments, the district has lost viable credentialed candidates for speech and language pathologist positions. In addition, applications for teaching positions are not prescreened for required

credentials. This delays the hiring process, and in some cases, requires the district to contract with outside service providers.

The Special Education Department lacks a system to monitor instructional assistant assignments. To effectively monitor the status of assignments and project future staffing needs, comprehensive information must be consistently maintained, updated for accuracy and shared with applicable management staff and other departments. The Special Education Department is responsible for calling and arranging substitutes for absent instructional assistants, but centralizing these duties in the Human Resources Department would be more efficient.

School districts throughout the state face a continuing challenge in funding the costs to serve special education students. Districts have experienced increases in the differences between the federal and state funding received and the mandated costs for these vital student services. The district's unrestricted general fund contribution to special education was 46% of total special education expenditures in 2015-16, 43% in 2016-17, and is projected at 53% in the 2017-18 first interim budget. The district's 2017-18 special education contribution is projected to increase by 67.6% since 2015-16. 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. Although the district's contribution is below the statewide average, the 67.6% increase in the total unrestricted general fund contribution over the last two years is significant and should be routinely monitored to determine if expenditures can be reduced using any of the exemptions allowed in the special education maintenance of effort (MOE). The 2017-18 projected expenditures for contracted services have increased by 161.8%; this is an exceptionally high increase, and these costs should be reviewed and analyzed to determine if hiring staff to provide these services would be more cost-efficient.

Monthly meetings of the director of special education, assistant superintendent of business services, and director of human resources should be established and include pertinent topics such as budget and staffing.

Findings and Recommendations

Response to Intervention/SST/MTSS

Response to Instruction and Intervention (RtI²)

In 2004, the reauthorization of the IDEA provided support for models that include a response to scientific, research-based interventions. The law stated that these methods may be used as an alternative to the discrepancy model in identifying students with learning disabilities. IDEA 2004 also shifted researched-based interventions from special education to general education, stressing that these methods would no longer be limited to special education students, but would apply to all students. The law left each individual state to develop its own guidelines and regulations. Response to Intervention (RtI), which the California Department of Education (CDE) now refers to as Response to Instruction and Intervention (RtI²), provides districts with a method to drive educational decisions and measure academic growth. The CDE information states the following:

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

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

1. Prevention: All students are screened to determine their level of performance in relation to grade-level benchmarks, standards, and potential indicators of academic and behavioral difficulties. Rather than wait for students to fail, schools provide research-based instruction within general education.
2. Intervention: Based on frequent progress monitoring, interventions are provided for general education students not progressing at a rate or level of achievement commensurate with their peers. These students are then selected to receive more intense interventions.
3. Component of specific learning disability (SLD) determination: The RtI² approach can be one component of the SLD determination as addressed in the Individuals with Disabilities Education Act (IDEA) 2004 statute and regulations. The data from the RtI² process may be used to demonstrate that a student has received researched-based instruction and interventions as part of the eligibility determination process.

The CDE is in the process of further defining how RtI² could be used in the eligibility process.

Sources: www.cde.ca.gov/sp/se/sr/documents/sldeligibiltyrti2.doc and <https://www.cde.ca.gov/ci/cr/ri/rtiresources.asp>.

In February 2011, the district adopted Board Policy 6120, Response to Instruction and Intervention, which documents the district's desire to provide a data-driven educational program designed to reduce achievement disparities among student subgroups. The board determined that the RtI² system would be designed by district staff and parents as appropriate. The district

has a site-based rather than a districtwide RtI2 process, and it includes leadership at each site. Elementary staff reported that the process includes Tier I-III intervention, but implementation differs from site to site.

Interventions in Tier I are based on the use of differentiation of the Common Core State Standards designed to meet the needs of all students in every classroom. Some elementary sites use universal screening tools, which meet the requirements for research-based assessments recommended through IDEA. Most sites use the Systematic Instruction in Phoneme Awareness, Phonics, and Sight Words (SIPPS), a system for struggling readers using a curriculum that teaches prerequisites for developing reading fluency and comprehension. Some sites also use early literacy assessments, such as Dynamic Indicators of Basic Early Literacy Skills (DIBELS), to measure the accuracy of literacy skills from kindergarten through sixth grade. These assessments are successful measures for Tier I and should be used by all sites.

Tier II interventions are designed for students who did not make adequate progress in Tier I and require additional evidence-based strategic and targeted instruction and supports. Most elementary and middle schools use classroom interventions such as Read Naturally as a supplemental reading program to improve reading fluency. The district also uses the Corrective Reading Program and Read 180 as interventions and has two intervention teachers to support Tier II reading interventions. No evidence of formal math interventions were provided to the study team.

At the secondary level RtI² is focused on incoming ninth graders who are transitioned through a collaborative program between the middle schools and high school. Before high school entrance, a counselor and intervention teacher meet with the middle school staff and review each student's attendance, behavior and grades. Supports are provided based on needs established by this review team. The high school support staff (counselor, general education and special education teachers) meet several times during the year to determine progress and adjust interventions and support. Few initial referrals are made to special education at the secondary level.

Tier III is designed for students who require targeted instruction designed to increase the rate of progress. These students have received Tier I and II support. Tier III is not considered to be special education or related services. Interviews indicated that Tier III interventions are not provided at all sites.

The district's RtI² process has no system to evaluate progress and achievement districtwide or by school and student subgroup. One data point that can measure the district's academic achievement based on the interventions implemented is gathered on the California School Dashboard. The dashboard allows the district to review its progress districtwide and at individual school sites based on statewide indicators. It also includes measures of the indicators for student subgroups such as English learners and special education. The table below outlines the district's progress in English/language arts (ELA) and math and provides an analysis of how special education students performed compared to students districtwide. The district is in the very low range in both ELA and math for the special education subgroup.

California School Dashboard for Coalinga-Huron (Fall 2017)

Total District Performance	Special Education Subgroup
English/Language Arts Low – Orange Performance Level Decreased 4.2 points	English/Language Arts Very Low – Red Performance Level Decreased 8.7 points
Math Very Low – Red Performance Level Decreased 9 points	Math Very Low – Red Performance Level Decreased 6.7 points

Source: *California School Dashboard, California Department of Education Fall 2017*

This is one measure of achievement. The district needs to gather data for all interventions used and determine the effectiveness of continued use for ELA and math.

Student Study Team/Student Success Team (SST)

The SST process is a longstanding and widely used method that gathers information from teachers, specialists and parents to provide a struggling student with additional educational strategies and interventions. All schools should have an SST process. The SST is a group formed at the school to further examine a student's academic, behavioral and social-emotional progress. A staff member or a parent can refer a student to the team. The SST typically consists of a teacher, administrator, support personnel, the parent and student (when appropriate) and differs from a parent-teacher conference, which focuses on improving communication and addressing specific problems in class. The SST meeting gives everyone an opportunity to discuss concerns and develop a plan to address them. The interventions agreed upon will vary depending on the child's educational needs, and the process has proven to be successful if consistently implemented.

In February 2011, the district adopted Board Policy 6164.5, Student Success Teams, documenting the district's desire to establish SSTs as needed to address individual student needs.

The district has developed summary forms to document initial concerns, follow-up and recommended strategies. Interviews indicated that some sites have their own forms and some sites do not consistently use the SST process. Because the district's SST process is a site-based decision, a student who struggles at one school may be assessed for special education before general education strategies and interventions are implemented. However, if the student attends a different school, he or she may have an SST meeting and appropriate strategies and interventions may be implemented, resulting in the student not being assessed for special education.

District staff stated that they receive many written requests from parents for assessment in lieu of the SST process, and direction from district administration requires that a full assessment be completed upon written request. The school staff expressed concerns that they sometimes have not had a chance to consider interventions through RtI² before consideration for special education eligibility. District staff also indicated that administrators, teachers and instructional assistants need professional development in RtI² for planning and providing appropriate levels of intervention.

Multi-Tiered System of Supports (MTSS)

An article titled "\$10 Million to Design MTSS in California" in *The Special EDge*, winter 2015, Volume 29, No. 1, describes MTSS as "standards-based instruction, interventions, mental health, and academic and behavioral supports aligned with accessible instruction and curriculum..."

The *Special EDge* issue indicates that an MTSS approach can, "be used to develop and align

resources, programs, supports, and services at all organizational levels to increase positive student outcomes.” The March 2015 Report of California’s Statewide Task Force on Special Education, titled “One System: Reforming Education to Serve ALL Students,” states the following:

MTSS is a whole-school, data-driven, prevention-based framework for improving learning outcomes for every student through a layered continuum (typically three tiers) of evidence-based practices that increases in intensity, focus, and target to a degree that is commensurate with the needs of the student.

The publication also states, “Operating at the student level, RtI is a part of MTSS and echoes the tenets of MTSS in structure.”

The CDE provides information regarding the similarities and differences between MTSS and RtI² as follows:

MTSS incorporates many of the same components of RtI², such as:

- Supporting high-quality standards and research-based, culturally and linguistically relevant instruction with the belief that every student can learn including students of poverty, students with disabilities, English learners, and students from all ethnicities evident in the school and district cultures.
- Integrating a data collection and assessment system, including universal screening, diagnostics and progress monitoring, to inform decisions appropriate for each tier of service delivery.
- Relying on a problem-solving systems process and method to identify problems, develop interventions and, evaluate the effectiveness of the intervention in a multi-tiered system of service delivery.
- Seeking and implementing appropriate research-based interventions for improving student learning.
- Using school-wide and classroom research-based positive behavioral supports for achieving important social and learning outcomes.
- Implementing a collaborative approach to analyze student data and working together in the intervention process.

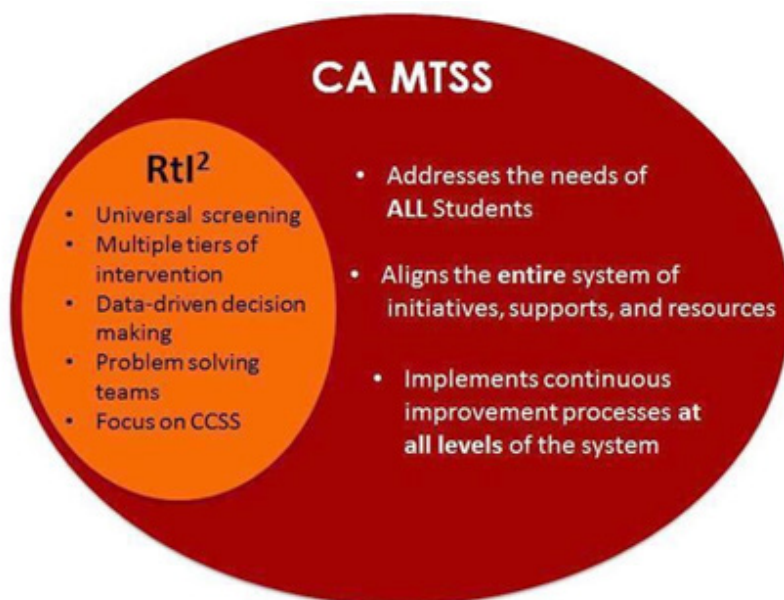
MTSS has a broader scope than does RtI². MTSS also includes:

- Focusing on aligning the entire system of initiatives, supports, and resources.
- Promoting district participation in identifying and supporting systems for alignment of resources, as well as site and grade level.
- Systematically addressing support for all students, including gifted and high achievers.
- Enabling a paradigm shift for providing support and setting higher expectations for all students through intentional design and redesign of integrated services and supports, rather than selection of a few components of RtI and intensive interventions.
- Endorsing Universal Design for Learning instructional strategies so all students have opportunities for learning through differentiated content, processes, and product.

- Integrating instructional and intervention support so that systemic changes are sustainable and based on CCSS-aligned classroom instruction.
- Challenging all school staff to change the way in which they have traditionally worked across all school settings.

MTSS is not designed for consideration in special education placement decisions, such as specific learning disabilities. MTSS focuses on all students in education contexts.

The following figure displays similarities and differences between California's MTSS and RtI² processes. Both rely on RtI²'s data gathering through universal screening, data-driven decision making, problem-solving teams, and are focused on the CCSS. However, the MTSS process has a broader approach, addressing the needs of all students by aligning the entire system of initiatives, supports, and resources, and by implementing continuous improvement processes at all levels of the system.



Source: California Department of Education. For more information and documents please refer to the CDE website <http://www.cde.ca.gov/ci/cr/ri/mtsscompri2.asp>.

Both RtI² and MTSS are necessary to build a comprehensive system of interventions and supports for all students. The district has a limited base foundation in RtI² and MTSS to have common intervention options. A districtwide committee could be used to help develop a strategic plan for RtI² and MTSS implementation and training.

RtI² includes a behavioral component widely known as Positive Behavior Interventions and Supports (PBIS). Nothing alone removes the barriers to learning that occur when behaviors disrupt school. The climate of each school is different; therefore, a “one size fits all” approach is less effective than interventions based on the needs of each.

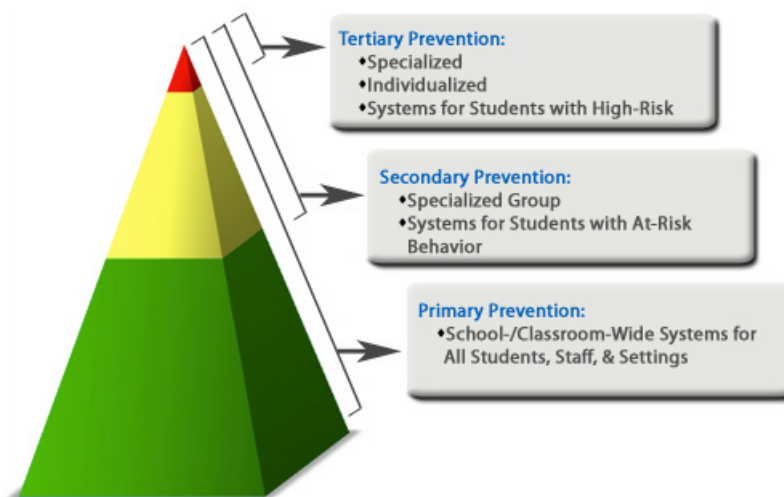
One of the foremost advances in schoolwide discipline is the emphasis on schoolwide systems of support that include proactive strategies for defining, teaching, and supporting appropriate student behaviors to create positive school environments. Instead of using a piecemeal approach

of individual behavioral management plans, a continuum of positive behavior support for all students in a school is implemented in areas including classroom and nonclassroom settings such as hallways, buses, and restrooms.

PBIS is a proactive approach to establishing the behavioral supports and social culture needed for all students in a school to achieve social, emotional and academic success. Attention is focused on creating and sustaining primary (schoolwide/classroom-wide), secondary (specialized group), and tertiary (individual) systems of support that improve lifestyle results (personal, health, social, family, work, recreation) for all youth by making targeted misbehavior less effective, efficient, and relevant, and desired behavior more functional.

The following diagram illustrates the multilevel approach PBIS offers to all students. These group depictions represent systems of support not children:

Continuum of School-Wide Instructional & Positive Behavior Support



Sources: CDE and http://www.boystowntraining.org/assets/1201-043-01_education_services_collateral_overview.pdf

Some district staff have attended PBIS training and expressed a desire to explore options to implement PBIS, but a districtwide program has not yet been implemented. FCMAT's interviews with site personnel indicated they want PBIS implemented at their sites to support student behavior and social-emotional needs, which affect academic learning.

Recommendations

The district should:

1. Use universal screening tools for assessments at all sites.
2. Expand the RtI² process to include measures to validate that the methods and programs implemented improve achievement in ELA and math.
3. Implement and establish baseline expectations for RtI² at all sites, with the Educational Services Department leading and monitoring the processes and procedures.

4. Provide intensive RtI² training for all applicable staff to assist with planning and implementation.
5. Implement SST at all sites, with the Educational Services Department leading and monitoring the processes and procedures.
6. Provide additional SST professional development to assist with implementation, and consider implementing annual refresher trainings.
7. Implement MTSS at all sites, with the Educational Services Department leading and monitoring the processes and procedures.
8. Provide intensive MTSS training for all applicable staff.
9. Consider using a districtwide committee to help develop a strategic plan for RtI² and MTSS implementation and training.
10. Consistently implement PBIS at all sites, with the Educational Services Department leading and monitoring the processes and procedures.
11. Provide PBIS training to all applicable staff.

Special Education Teacher and Instructional Assistant Staffing

The district operates a continuum of special education services that reflect a traditional resource specialist program (RSP) and a range of mild/moderate and moderate/severe special day classes (SDCs). As with all California school districts, the caseload for RSP is defined by Education Code Section 56362(c), which establishes a maximum caseload of 28 students.

Because the Education Code does not establish maximum caseloads for self-contained special education program classes, some districts adopt their own board-approved caseload standards, and others operate with unofficial local caseload practices. Coalinga-Huron Unified has an unofficial internal Special Education Department document titled “Increasing and Decreasing Staff and Resources.” Interviews indicated that the Human Resources Department is unaware of this document, and its source is unknown. Clarity should be established on the status of this unofficial guideline, and this document should be provided to and reviewed with other departments such as Human Resources and Business Services, to determine if it can be used as a district staffing guideline. The district operates a range of SDCs from preschool to adult services. However, the range of SDCs is not operated on all campuses, and district transportation may be required for students whose SDC service is not located at their school of residence.

Staff indicated special education teachers and instructional assistants lack professional development offerings. Staff learn on the job and have requested professional development, but have not received it.

Instructional assistants must maintain a level of confidentiality when working with special needs students and should have access to the students’ IEPs to know their strengths and weaknesses, health concerns, and goals to be efficient when assisting the students. However, the district’s instructional assistants do not have access to IEPs.

FCMAT requested numerous district documents to determine special education staffing, full-time staff equivalency, and the number of students served. The following staffing analysis is based on district data, Education Code requirements and industry standards.

Resource Specialist Program

Education Code Section 56362 (c) states the following:

Caseloads for resource specialists shall be stated in the local policies developed pursuant to Section 56195.8 and in accordance with regulations established by the board. No resource specialist shall have a caseload which exceeds 28 pupils.

In addition, Education Code Section 56362 (f) states, “At least 80 percent of the resource specialists within a local plan shall be provided with an instructional aide.”

According to Education Code caseload requirements, the district needs 9.8 full-time equivalent (FTE) resource specialists. However, the district employs 13.5 FTE resource specialists and thus is overstaffed by 3.7 FTE. A large geographic area separates Coalinga and Huron schools, and this factor should be considered when analyzing staffing. The tables below separate the caseloads by Coalinga and Huron for this purpose. If the district staffed at a caseload of 28 with 9.8 RSP teachers, it would require 10 six-hour instructional assistants, or an equivalent of 60 hours. The district employs 60 hours of assistant time; however, the allocation of hours is varied from program to program and not equitable for all RSP programs. The district also employs a five-hour 1-to-1 instructional assistant for a student receiving services primarily through the resource program.

Coalinga - Resource Specialist Caseloads K-12

Grade Span	Teacher FTE	Total Caseload	Caseload Average	Education Code	Staffing FTE Above (+)/Below (-) Education Code
K-12	9.5	204	21.5	28	+2.2 FTE

Coalinga - Resource Specialist Instructional Assistant Staffing K-12

Grade Span	Teacher FTE	IA Total Hours (if all positions are filled)	Industry Standard IA Hours Per Teacher FTE	IA Hours Above (+)/Below (-) Industry Standard	I:I IA Hours
Elementary	3.0	15.0	1 FTE/6 IA hours	-3.0 hours	5.0
Middle	3.0	15.0	1 FTE/6 IA hours	-3.0 hours	0
High	3.5	10.0	1 FTE/6 IA hours	-11.0 hours	0

Huron - Resource Specialist Caseloads K-8

Grade Span	Teacher FTE	Total Caseload	Caseload Average	Education Code	Staffing FTE Above (+)/Below (-) Education Code
K-8	4.0	69	17.3	28	+1.5 FTE

Huron - Resource Specialist Instructional Assistant Staffing K-8

Grade Span	Teacher FTE	IA Total Hours	Industry Standard IA Hours Per Teacher FTE	IA hours Above (+)/Below (-) Industry Standard	I:I IA Hours
Elementary	2.0	10.0	1 FTE/6 IA hours	-2.0 hours	0
Middle	2.0	10.0	1 FTE/6 IA hours	-2.0 hours	0

Mild/Moderate Special Day Class

The Education Code does not dictate class sizes for SDC. However, the industry standard throughout California is one teacher and one six-hour instructional aide per class with an average of 12-15 students. The district employs 10.0 FTE teachers for its mild/moderate SDCs. Based on the maximum industry standard of 15 students, these classes are slightly overstaffed. However, because of the district's large geographic area and grade-level configurations, these classes are actually adequately staffed overall. Some of the grade level clusters have small overages, but districtwide, the staffing ratio for teachers is accurate.

According to industry standards, the district is overstaffed with classroom instructional assistants by six hours. Additional classroom staff is sometimes necessary because of specific needs, and the district should determine if this is the case based on its particular circumstances. The district also employs 44 hours per day of 1-to-1 instructional assistant support for students served in this program. More information regarding 1-to-1 assistants, determination of need, and independence will be discussed later in this section of the report.

Coalinga – Mild/Moderate Special Day Class Teacher Caseloads K-12

Grade Span	Teacher FTE	Total Caseload	Caseload Average	Industry Standard Caseload	Staffing FTE Above (+)/Below (-) Industry Standard	District Document Caseload	Staffing FTE Above (+)/Below (-) District Document
K-5	3.0	31	10.3	12-15	+0.9 FTE	12-15	+0.9 FTE
6-8	2.0	20	10.0	12-15	+0.7 FTE	12-15	+0.7 FTE
9-12	2.0	34	17.0	12-15	-0.3 FTE	12-15	-0.3 FTE

Coalinga - Mild/Moderate Special Day Class Instructional Assistant Staffing K-12

Grade Span	Teacher FTE	IA Total Hours	Industry Standard IA Hours Per Teacher FTE	IA Hours Above (+)/Below (-) Industry Standard	I:1 IA Hours
Elementary	3.0	25.0	1 FTE/6 IA hours	+7.0 hours	24.0
Middle	2.0	10.0	1 FTE/6 IA hours	-2.0 hours	8.0
High	2.0	11.0	1 FTE/6 IA hours	-1.0 hours	0

Huron – Mild/Moderate Special Day Class Teacher Caseloads K-8

Grade Span	Teacher FTE	Total Caseload	Caseload Average	Industry Standard Caseload	Staffing FTE Above (+)/Below (-) Industry Standard	District Document Caseload	Staffing FTE Above (+)/Below (-) District Document
Elementary	2.0	22	11.0	12-15	+5 FTE	12-15	+0.5 FTE
Middle	1.0	17	17.0	12-15	-.1 FTE	12-15	-0.1 FTE

Huron - Mild/Moderate Special Day Class Instructional Assistant Staffing K-8

Grade Span	Teacher FTE	IA Total Hours	Industry Standard IA Hours Per Teacher FTE	IA Hours Above (+)/Below (-) Industry Standard	I:1 IA Hours
Elementary	2.0	15.0	1 FTE/6 IA hours	+3.0 hours	0
Middle	1.0	5.0	1 FTE/6 IA hours	-1.0 hours	12.0

Moderate/Severe Special Day Class

For moderate/severe classes, the industry standard is one teacher and two six-hour instructional assistants per class with an average of 10-12 students. The district employs 4.0 FTE teachers for its moderate/severe K-12 SDCs, and based on the maximum industry standard of 12 students, these classes are slightly overstaffed. However, because of the district's large geographic area, it does not appear feasible to reduce the moderate/severe teacher staffing.

According to industry standards, the district is overstaffed with classroom instructional assistants by 3.6 hours. It should determine if additional classroom staff is required because of specific needs. The district does not employ 1-to-1 instructional assistants in these classrooms, therefore, the additional aide hours could be due to greater needs in the class, and staffing may be appropriate.

The district provides one adult transition program (ATP) for 18-22 year olds. The program is operated with a full-time instructor and is not at class size capacity; however, teacher staffing cannot be reduced. Because this program is for adult transition into the workplace or supported living, staff are to assist with independence and job development. Only 1.6 hours per day four days per week of aide time is allocated to this program. This may limit the access students have in the community because they usually need to be supported by adults while off campus.

Coalinga – Moderate/Severe Special Day Class Teacher Caseloads K-12 and ATP

Grade Span	Teacher FTE	Total Caseload	Caseload Average	Industry Standard Caseload	Staffing FTE Above (+)/Below (-) Industry Standard	District Document Caseload	Staffing FTE Above (+)/Below (-) District Document
K-12	3.0	29	9.7	10-12	+0.6 FTE	8-12	+0.6 FTE
ATP	1.0	8	8.0	12-17	+0.5 FTE	15	+0.5 FTE

Coalinga – Moderate/Severe Special Day Class Instructional Assistant Staffing K-12 and ATP

Grade Span	Teacher FTE	IA Total Hours	Industry Standard IA Hours Per Teacher FTE	IA Hours Above (+)/Below (-) Industry Standard	I:1 IA Hours
Elementary	1.0	15.0	1 FTE/12 IA hours	+3.0 hours	0
Middle	1.0	12.0	1 FTE/12 IA hours	Within	0
High	1.0	17.0	1 FTE/12 IA hours	+5.0 hours	0
ATP	1.0	1.6	1 FTE/12 IA hours	-10.4 hours	0

Huron – Moderate/Severe Special Day Class Teacher Caseloads K-5

Grade Span	Teacher FTE	Total Caseload	Caseload Average	Industry Standard Caseload	Staffing FTE Above (+)/Below (-) Industry Standard	District Document Caseload	Staffing FTE Above (+)/Below (-) District Document
K-5	1.0	9	9.0	10-12	+0.2 FTE	8	-0.1 FTE

Huron - Moderate/Severe Special Day Class Instructional Assistant Staffing K-5

Grade Span	Teacher FTE	IA Total Hours	Industry Standard IA Hours Per Teacher FTE	IA Hours Above (+)/Below (-) Industry Standard	I:1 IA Hours
K-5	1.0	18.0	1 FTE/12 IA hours	+6.0 hours	0

Preschool Staffing

The district operates one preschool SDC for three hours per day at the West Hills College preschool center. The class has a teacher and two three-hour aides. The preschool teacher is a split position that teaches preschool in the morning and high school special education in the afternoon. Below is a table of the industry standards and Education Code and California Code of Regulations requirements for preschool. According to code, the district operates with six hours per day of excess staffing. Additional classroom staff is sometimes necessary because of specific needs, and the district should determine if additional staff is warranted based on its particular circumstances. The district also supports students in Huron through Head Start consultation and provides speech and language pathologist (SLP) services at school sites or at home.

Various Industry Standards and Code Requirements for Preschool Staffing

Preschool Program	# Students	# Teachers /# Aides	Adult-to-Student Ratio
General Education	16	1/1	1:8
SDC Mild/Moderate	14	1/1	1:7
SDC Moderate/Severe	10	1/1	1:5
SDC Autism	9	1/2	1:3
Speech Only	40	1/0	1:40

Sources: 22 CCR Section 101216.3; Education Code Sections 56441.5, 56030.5, and 56441.7; National Research Council Recommendations

Special Day Class Preschool Program Caseloads

Class	Teacher FTE	Total Students	*# of 3-Hour IA Positions	Industry Standard Adult-to-Student Ratio Per Session	District Adult-to-Student Ratio	Staffing FTE Above (+)/Below(-) Industry Standard
Preschool	.5	5	2.0	1:5	1:1.7	+2.0 Adults

*Based on 3-hour IAs, which is the entire preschool session

Interviews indicated that the district's practice is to fully reassess all five-year-olds with an IEP before they enter kindergarten. This is not a requirement and is necessary only if a primary service/placement type or eligibility changes. The best practice is to complete a transition process to include updates on goal progress and functional skills. Information on IDEA requirements and kindergarten transition is available at http://www.cpeionline.net/pluginfile.php/11976/mod_resource/content/3/Handbook%20on%20Transition.pdf.

Special Circumstance Instructional Assistance – 1-to-1 Support Staff

Interviews indicated that staff is unaware of and does not use an evaluation procedure to determine if additional classroom or specific student support is required. Districts usually use a formal procedure, typically known as the special circumstance instructional assistance (SCIA) assessment, to determine need. An SCIA evaluation should be a formal assessment to determine if a student requires additional assistance throughout the day, or if a class may warrant additional support above the industry standard. Students meeting the SCIA criteria would require 1-to-1 assistance based on the evaluation and IEP team determination. Manuals are available throughout the state to assist with the development of an assessment, fade plans, and training; one example is available on the internet at http://dmselpa.org/UserFiles/Servers/Server_1092603/File/Resources/Educators/SCIA%20Guide%200914.pdf.

When the district assigns a student or class with additional support, there is no process to monitor progress, related IEP goals for student independence or a fade plan to systematically reduce intensive supports. SCIA's, also known as 1-to-1 aides, can hinder the development and progress of students if staff are not well trained in developing student independence. Some peer-reviewed articles suggest that 1-to-1 aides are more restrictive than an SDC even if the student is in the general education program. As shown in the above tables, the district employs 49 hours per day of additional assistance in the form of 1-to-1 aides.

Recommendations

The district should:

1. Establish transparent caseload guidelines, and ensure they are shared with staff in applicable departments.
2. Provide professional development opportunities for special education teachers and instructional assistants.
3. Allow instructional assistants to review student IEPs to be familiar with student needs.
4. Review RSP teacher staffing and determine if staffing can be reduced.
5. Review instructional assistant staffing, including 1-to-1 aides, and determine appropriate and equitable staffing needs.
6. Evaluate the function of the adult transition program and determine the number of instructional assistants needed to support the program both on and off campus.
7. Develop and utilize a transition packet for preschool to kindergarten students.
8. Develop and utilize a SCIA assessment process and provide professional development for its use.
9. Ensure that an individual fade plan with specific goals is developed in each IEP that provides for an SCIA.

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 psychological services, speech pathology, adaptive physical education, occupational and physical therapy, school health and nursing services.

The district's related service providers do not meet regularly with the director of special education to discuss needs and concerns or solve problems. Interviews indicated that staff have asked for professional development to remain current in their specific field; however, they perceive that department administration does not recognize this as a need.

FCMAT used Special Education Information System (SEIS) 2017 caseload data prepared by the district, documentation provided by the Special Education Department, and information from interviews with site and district staff to complete its analysis of related service provider staffing.

Speech and Language Pathologists

Education Code Section 56441.7(a) establishes a maximum caseload of 40 for speech and language pathologists (SLPs) serving preschool age students, and Section 56363.3 establishes a SELPA wide average of 55 students for K-12. The district employs 3.0 FTE speech pathologists and contracts with a nonpublic agency (NPA) for 1.0 FTE.

A total of 3.6 FTE is allocated for K-12 speech therapy. The K-12 SLPs have an average caseload of 71.7, which exceeds the statutory SELPA or districtwide average of 55 students. Approximately one additional FTE is needed to be in compliance. If the district cannot locate and retain an additional SLP, it should strongly consider utilizing "telepractice (remote video)" speech services, which are widely used throughout California because of the SLP shortage. This approach is typically most successful with students who are not in preschool and with those who do not have moderate/severe disabilities.

The SLP staffing allocation for preschool is .4 FTE. The preschool SLP caseload is 15 students, which is within the statutory requirements.

The district also employs five-hour aides to support the SLPs. The aides are classroom aides rather than speech and language pathologist assistants (SLPAs), and do not have a background in speech and language services. Interviews indicated that the aides do not receive formal training for their job duties. Aides and SLPAs cannot be used to reduce the Education Code caseload limits of SLPs.

Speech and Language Pathologist Caseloads

Program	# of FTE	Caseload	Caseload Average	Education Code
SLP - Preschool	.4	15	37.5	40
SLP - K-12	3.6	258	71.7	55

Sources: District data, SEIS document maintained by the district, Education Code Sections 56441.7(a) and 56363.3

Interviews indicated that SLP services are provided for 30 minutes per week to each of four students parentally placed in private schools. Information provided by CDE regarding 20 USC Section 1412 (a)(10) states the following:

It shall be the policy of this LEA to assure that children with disabilities voluntarily enrolled by their parents in private schools shall receive appropriate special education and related services pursuant to LEA coordinated procedures. The proportionate amount of federal funds will be allocated for the purpose of providing special education services to children with disabilities voluntarily enrolled in private school by their parents.

The Fresno County SELPA has established guidelines and proportionate-share procedures for support of students in private schools. The information is available at <http://selpa.fcoe.org/node/162>. Most districts provide consultation services to the private school staff monthly or quarterly, but not direct services to private school students.

Psychologists

The district has 4.0 FTE psychologist positions: 3.6 FTE is allocated for K-12 and .4 FTE is allocated for preschool. However, at the time of FCMAT's fieldwork one of the four positions was vacant but unadvertised.

Staff reported the K-12 psychologists perform common duties such as serving as a member of the student study teams, assessments, crisis counseling and site support as needed. The preschool psychologist completes assessments for students ages 3-4 and participates in the transition of students from infant services to preschool.

CalEdFacts (www.cde.ca.gov/re/pn/fb/) indicates that the statewide average caseload for K-12 school psychologists is 1,050 students; this statewide average is used by the study team as the industry standard caseload guideline. The analysis does not break out specialized assignments from within the K-12 population; accordingly, the .4 FTE that serves the preschool population is not included in the following table. Based on the district's enrollment of 4,450 students, it is above the industry standard and needs a total of 4.2 FTE (an additional .6 FTE) to support the total K-12 population.

Psychologist Caseloads

Program	# of FTE	Enrollment	Caseload Average	Industry Standard
Psychologists - K-12	3.6	4,450	1,236	1,050

Sources: CalEdFacts and district data

Staff reported that job-alike meetings are not held for the psychologists, and scheduled meetings are often canceled. Professional development is needed in specific areas unique to the psychologists' needs and interests.

Interviews indicated the psychologists' access to assessments and protocols is inconsistent. The district is taking steps to standardize assessment tools; however, some psychologists reportedly lack access to the tools and may need to purchase them with their own funds. The department also lacks a systematic criterion for making equitable assignments for psychologists.

Interviews indicated the district does not maintain a multidisciplinary assessment report. Instead, all assessors provide a section of information at the IEP meeting. The best practice is to develop a universal template used by all assessors that is compiled into one report, typically by the school psychologist. The template report should be developed with defensibility in mind and contain clear information.

Occupational Therapists

The district does not employ occupational therapists (OTs), but a certified NPA provides services using certified OTs. Districts commonly contract these services. The contract states the following:

Occupational therapist will service up to 9 students for every 8 work hours, with 1 FTE occupational therapist servicing up to 45 students. District agrees to fund 0.8 FTE to 1.0 FTE occupational therapist (OTR) during the 2017/18 school year...

The contract further indicates that the contractor is paid an hourly rate for services. The district may determine the number of students to be served based on industry standards, and service includes initial assessment, annual assessments, direct service and consultation services. The industry standard for OT student caseload is 45-55; therefore, FCMAT used a caseload of 50 in its analysis. Based on this information, the district needs .68 FTE for its caseload of 34 students.

Occupational Therapist Caseloads

Program	# of FTE	Caseload	Caseload Average	Industry Standard
Occupational Therapist	1.0	34	34.0	45-55

Sources: District data and industry standards

Adapted Physical Education

The district contracts with the Fresno County Superintendent of Schools for adapted physical education (APE) services. The contract specifies a caseload of 40 students per FTE, and the district's caseload is 16 students. Based on the county office standard of 40 students per FTE, the district needs 0.4 FTE and purchased services for 0.4 FTE. The industry standard for APE student caseload is 45-55. It is unknown if the county office used a lower caseload limit because of the necessary travel time to the district.

Nurses

A variety of health care services are provided throughout the district to general education and special education students. School nurses provide mandated hearing and vision screenings, train and support health technicians assigned to school sites, develop specialized health care procedure plans for students with disabilities that have unique and specialized health care needs identified in the IEP, and assist IEP teams in the identification of students with health impairments.

The district employs 3.8 FTE school nurses and six 5.5 hour health technicians who support the school sites. According to CalEdFacts, the statewide average caseload for school nurses is 2,368; this statewide average is used by the study team as the industry standard caseload guideline. The district's average caseload is 1,171, which is significantly below the industry standard. According to industry standards, the district needs 1.9 FTE school nurses. These standards do not include health technicians.

Nurse Caseloads

Program	# of FTE	Enrollment	Caseload Average	Industry Standard
Nurses	3.8	4,450	1,171	2,368

Sources: CalEdFacts and district data

Recommendations

The district should:

1. Ensure that its related service providers routinely meet with the director of special education to discuss relevant issues
2. Establish professional development opportunities for its related service providers.
3. Attempt to fill speech pathologist positions with district staff. If it is necessary to fill open positions with NPA staff, ensure that the cost is negotiated with the agency and aligns with district staffing costs when possible.
4. Audit SLP caseloads to determine how many students exit speech services and how much support students receiving indirect speech services require.
5. Review the SLP caseloads and staff to statutory requirements.
6. Consider using telepractice speech services if it is unable to fill open positions.
7. Ensure that the aides used to support SLPs receive formal training for their job duties.
8. Review the proportionate share of costs for parentally placed private school students and ensure it follows the Fresno County SELPA's proportionate share procedures.
9. Review the psychologist caseloads and determine if staffing is adequate for its needs.
10. Consider conducting a collaborative planning session with psychologists so they can give input into the assignment schedule and for increased understanding of the department and school site needs.
11. Develop an annual process and timeline to identify needed psychologist assessment tools.
12. Develop a multidisciplinary assessment report template.
13. Consider creating a centralized pool of assessments that are available to all psychologists on a check-out basis.
14. Routinely monitor OT caseload to ensure close alignment to industry standard.

15. Establish a contract for OT to include specific duties and services for the number of students assessed and served.
16. Routinely monitor the APE caseload to ensure it is maintained at or slightly below the industry standard.
17. Review nursing caseloads and responsibilities and determine the level of health care staff needed to meet its needs and align with the industry standard.

Identification Rate

The district serves students with disabilities in preschool through age 22. Staff reported that at some sites, special education is one of the only avenues for students to receive additional support.

FCMAT can analyze target rates, type of referrals such as parent or district referral, eligibility trends and more if the district tracks referrals and assessments, but the district does not track this collectively or consistently.

The district's total student enrollment has slightly increased, and the special education identification of students with IEPs has significantly increased since 2014-15. The statewide identification average is 10.7%, and the district's 2017-18 identification rate is 11.5% based on December 2017 uncertified data.

Total Identification Rate

School Year	Total Enrollment	*Students with IEPs	Percentage
2014-15	4,367	392	9.0%
2015-16	4,447	443	10.0%
2016-17	4,450	480	10.8%
2017-18**	4,452	511	11.5%

Sources: DataQuest, Ed-Data, SEIS and CASEMIS (district of residence)

*Excludes infants and preschool age

**2017 uncertified data

The table below shows the district's identification rate by disability compared to the county and state averages. The district is significantly over the county and state average in specific learning disability (SLD) by 12%, or approximately 60 students. If the district were within state and county SLD averages, it might be able to reduce its special education costs. This possible overidentification may be because of several factors, including the following, which should be researched and analyzed specifically for SLDs:

- English language learner proficiency versus a purely defined SLD
- Overuse of the Section III Category under IDEA 3030 eligibility criteria, which states the following:

If the standardized tests do not reveal a severe discrepancy, the IEP team may find that a severe discrepancy does exist, provided that the team documents in a written report that the severe discrepancy between ability and achievement exists as a result of a disorder in one or more of the basic psychological processes. The report shall include a statement of the area, the degree, and the basis and method used in determining the discrepancy. The report shall contain information considered by the team which shall include, but not be limited to: (i) Data obtained from standardized assessment instruments; (ii) Information provided by the parent; (iii) Information provided by the pupil's present teacher; (iv) Evidence of the pupil's performance in the regular and/or special education

classroom obtained from observations, work samples, and group test scores; (v) Consideration of the pupil's age, particularly for young children; and (vi) Any additional relevant information

- Lack of general education intervention under the RtI² model.

Identification Rate Percentages - December 1, 2016

Disability	District	County	State
Intellectual Disability	6.1	10.6	5.8
Hard of Hearing	1.7	1.7	1.4
Deaf	0.2	0.5	0.4
Speech or Language Impairment	22.6	22.9	21.2
Visual Impairment	0.6	0.7	0.5
Emotional Disturbance	1.2	2.7	3.3
Orthopedic Impairment	0.4	1.8	1.5
Other Health Impairment	6	10.5	12
Specific Learning Disability	50.7	38.7	38.9
Deaf-Blindness	0	0	0
Multiple Disability	1	0.5	0.9
Autism	9.5	8.9	13.9
Traumatic Brain Injury	0	0.4	0.2

Sources: DataQuest and CASEMIS 12-1-2016, includes infants and preschool

District Identification Rate Percentages – 2014-15 through 2016-17

Disability	2014-15	2015-16	2016-17
Intellectual Disability	7.3	6	6.1
Hard of Hearing	1.8	1.9	1.7
Deaf	0.2	0.2	0.2
Speech or Language Impairment	32.3	27.8	22.6
Visual Impairment	0.9	0.8	0.6
Emotional Disturbance	1.8	1	1.2
Orthopedic Impairment	0.5	0.4	0.4
Other Health Impairment	7.8	6.6	6
Specific Learning Disability	38.3	45.2	50.7
Deaf-Blindness	0	0	0
Multiple Disability	0.9	1	1
Autism	8	9.1	9.5
Traumatic Brain Injury	0	0	0

Sources: CASEMIS 12-1-2014, 12-1-2015, 12-1-2016; includes infants and preschool

Recommendations

The district should:

1. Review assessment requests and determine if general education interventions are appropriate before assessment for special education.
2. Consider tracking types of referrals, assessments and eligibility rates to help monitor various annual trends.
3. Establish criteria to determine if the lack of English-language proficiency impedes a student's knowledge and whether staff determine the student is learning disabled prematurely.
4. Establish consistent criteria on when to use the Section III category.
5. Review each student identified as SLD and determine if the identification is accurate.
6. Investigate ways to serve students before identification or to remediate, support and potentially exit them from special education.

Continuum of Services

The IDEA requires schools to provide each disabled student with a free appropriate public education (FAPE) (Title 34, Code of Federal Regulations, 300.17). FAPE is defined as an educational program that is individualized to a specific child, designed to meet his or her unique needs and provide educational benefit. The requirement that students be served in the least restrictive environment (LRE) ensures that whenever possible, handicapped students are educated with students who are not handicapped. IDEA prohibits the removal of any student from the general education setting unless the handicap is severe enough to prevent him or her from being educated satisfactorily using supplementary aids and services. The legislation permits a student to be placed outside of the general education program to ensure that his or her IEP can be implemented; therefore, a district has discretion regarding how best to serve its special education students. Districts are also required to provide students with access to a full range of services (Title 34, Code of Federal Regulations, 300.115 and Education Code Section 56361).

FCMAT reviewed the programs and range of service options available to the district's special education students and found the district provides a complete continuum of services as described in the Fresno County SELPA Local Plan and as required by state and federal regulations. The district provides specialized academic instruction (SAI) from preschool through age 22 in a variety of settings based on IEPs. The district provides SAI in a traditional pullout resource specialist program, specialized push-in mild/moderate and self-contained special day class programs. The program options and delivery vary from school site to school site.

In addition to the more traditional SDC and RSP models, Fresno County SELPA regional programs serve students with deaf and hard of hearing disabilities or emotional disturbance. A full continuum of countywide special education services and regional programs are available for students with moderate to severe disabilities who are ages three to 22; services are provided in a regional class in one of the SELPA districts. Staff reported that the SELPA's large geographical area can make access to regional classes and services difficult; however, the district provides transportation for students with disabilities.

The district either provides or contracts for all related services required by state and federal regulations, including state special schools and nonpublic schools. The district does not have its own SDC programs for students with social/emotional disabilities, and staff indicated that they would like to have some of those options available for students in the district at elementary and secondary levels.

The Fresno County Office of Education operates programs for students who have cognitive and social/emotional difficulties that adversely affect their educational performance to a degree that they cannot function in an SDC in their district of residence. These programs include an emphasis on a cognitive/development approach to behavior management, improving social skills. Outside agencies may be used to address and support mental health issues. An outline of all programs and services offered by the county office is available in the Fresno County SELPA Local Plan.

Recommendations

The district should:

1. Continue to provide the full continuum of programs and services in coordination with the Fresno County SELPA.
2. Explore the options for developing programs for students with emotional disabilities at the elementary and secondary level.
3. Continue the provision of services for low-incidence disabilities, such as vision and deaf and hard of hearing, through the Fresno County SELPA.

Organizational Structure

FCMAT compared the Special Education Department's administrative and clerical support staffing with three unified districts: Cutler-Orosi, Lindsay and Soledad. 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 the number of English learners. Comparison data was taken from CDE's DataQuest and district websites. The total number of students with disabilities birth through 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 considered.

Administrative and Clerical Support

District	Special Education Administration	Clerical Support Positions	Total Enrollment	Students with Disabilities
Coalinga-Huron	1 director 1 program specialist	1 administrative assistant	4,450	504
Cutler-Orosi	1 director 1 program specialist	1 special services clerk	4,126	281
Lindsay	1 director 1 program specialist	1 administrative assistant 1 data clerk	4,191	307
Soledad	1 director	1 coordinator 1 secretary	4,856	656

Source: CDE DataQuest 2016-17 and district websites

The district has two management positions: one director and one program specialist who is paid on the certificated salary schedule. The average number in the comparison districts is approximately two.

Each district identifies special education clerical support positions by different titles. Therefore, the study team reviewed the district's administrative and clerical job descriptions and those posted online for the comparison districts for comparability. The district has one clerical support position, and the average number in the comparison districts is 1.67 FTE. The additional clerical support in the comparison districts addresses department needs for pupil count data management and overall support.

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 (e.g., emails and phone calls) from the director of special education is delayed or nonexistent and frequently inconsistent. This has created a high level of staff frustration. Staff expressed a desire for leadership and direction for special education at the school sites. Interviews with staff at all levels indicated high levels of support from the program specialist.

FCMAT found that the principals and teachers lack essential training in methods, assessment, behavior management and IEP writing/case management. There are no opportunities for job-alike meetings for specialists (e.g., psychologists, SLPs, and other related service providers) or teachers to meet and learn from each other, discuss problem cases and receive critical training.

The Special Education Department lacks the necessary systems to ensure effective and efficient operation. For example, staff indicated frustration with the lack of consistent procedural direction from the department. There is a lack of continuity in eligibility protocol, and staff has concerns with eligibility determined at the district level in parent meetings, which occur outside of the IEP process.

The Human Resources and Special Education departments lack communication, causing the district to lose viable credentialed candidates for speech and language pathologist positions. Specifically, interviews were scheduled when no interview panel was available. In addition, applications for teaching positions are not prescreened for required credentials. The interview panel chooses candidates for special education teaching positions only to find out that they do not qualify for the position. This results in a hiring delay, and in some cases, requires the district to contract with outside service providers.

Interviews indicated that some employees including the director of special education, special education teachers, psychologists, and speech and language pathologists are not routinely evaluated. Human Resources recently created a system for assigning the special education employee evaluations to administrative staff. However, FCMAT found that administrative staff was unaware of their responsibility for specific evaluations, such as those for the program specialist and nurses.

The Special Education Department lacks a system to monitor instructional aide assignments; including classification, FTE and site/classroom/student assignment, in either electronic or paper format. To effectively monitor the status of special education instructional assistants and project future staffing needs, this comprehensive information must be consistently maintained and updated for accuracy and provided to applicable management staff and other departments.

The Special Education Department is responsible for calling and arranging substitutes for instructional assistants who are absent. It would be more efficient to centralize these duties in the Human Resources Department. Centralizing the duties would also help ensure that regulations regarding the use of substitutes are consistently followed.

Recommendations

The district should:

1. Review the amount of clerical work in the Special Education Department and ensure that it is staffed appropriately.
2. Maintain continued support to school sites with the program specialist position.
3. Set standards of practice for effective communication with the Special Education Department that are implemented and monitored to ensure that the administration is consistent with directives.

4. Establish operating guidelines that require responses to all calls and email within one business day. If an answer is not immediately available, ensure that the Special Education Department staff informs the person about when he or she will receive a response and provide ongoing updates until the issue is resolved.
5. Provide opportunities for principals to receive necessary special education training.
6. Schedule and conduct job-alike meetings for special education staff at least quarterly. Ensure that the agenda is robust in training, guidance and support.
7. Establish clear guidelines and operating procedures for the Special Education and Human Resources departments for hiring, position control, and required credentials for special education staff.
8. Ensure that all evaluations for special education staff are completed timely each year.
9. Ensure that the Special Education Department develops an efficient and accurate documentation system to track instructional assistants in relation to classification, FTE and site/classroom/student assignment.
10. Reassign the duties for obtaining substitute instructional assistants to Human Resources.

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.

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 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 exceptions 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 and 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 \$1,884,233, or 46% of total special education expenditures in 2015-16 and \$2,255,448, or 43% in 2016-17. Based on the first interim MOE documents, the district's 2017-18 approved budget for special education is \$5,955,413, and the unrestricted general fund contribution is projected to be \$3,157,078, or 53%.

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 statewide 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 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, revenue limit funding generated by SDC attendance was transferred from the unrestricted general fund to the special education program. SDC ADA is no longer reported separately, and the CDE determined that this transfer will no longer be made. 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, but the accounting change itself does not adversely impact a district's overall resources.

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 2017-18 special education contribution is projected to increase by \$1,272,845 since 2015-16, or 67.6%.

The table below shows the special education revenue the district receives from state, federal, and local resources. The revenue data is based on district financial system reports provided to FCMAT. Since 2015-16 the district's revenue received to operate special education programs has increased by \$334,099 or 15.4%.

Special Education Revenues from 2015-16 to Projected 2017-18

Description	2015-16	2016-17	Projected 2017-18	Difference from 2015-16 to Projected 2017-18
IDEA Entitlement	\$723,302	\$781,688	\$812,084	+\$88,782
IDEA Preschool	\$52,996	\$101,479	\$65,430	+\$12,434
AB 602 State Apportionment	\$1,251,769	\$1,534,621	\$1,468,660	+\$216,891
AB 602 State Apportionment, Prior Year Adjustments	\$0	\$25,384	\$11,084	+\$11,084
State Mental Health	\$146,447	\$99,588	\$66,786	-\$79,661
Other State	\$0	\$0	\$38,864	+\$38,864
Workability Local	-\$427	\$2,797	\$3,172	+\$3,599
Other Local	\$0	\$0	\$42,107	+\$42,107
Total Revenues	\$2,174,087	\$2,545,557	\$2,508,186	+\$334,099

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 rising increases in the differences between the federal and state government funding received and the mandated costs for these vital student services. Special education funding is based on total districtwide ADA rather than only that of identified students or SDC attendance. It is important to monitor attendance and attendance

rates districtwide, including that of SDCs. Every school day results in revenue earned or lost based on the attendance of each student.

The table below shows the district's special education program expenditures. The expenditure data is based on the MOE documents provided to FCMAT. Since 2015-16, the district's expenditures to operate special education programs are projected to increase by \$1,833,065, or 44.5%. Salaries and employer paid benefits are two of the largest components of the expenditure increase. Since 2015-16 certificated salaries have increased by 16.5%, classified salaries have risen by 36.9%, and employer paid benefits have gone up by 72.1%. A portion of the increased cost for benefits has been imposed on special education programs due to increases in California State Teachers' Retirement System (STRS) and California Public Employees' Retirement System (PERS) employer contribution rates. Since 2015-16 contracted services have increased by 161.8%, which is an exceptionally large amount.

Special Education Expenditures from 2015-16 to Projected 2017-18*

Description	2015-16	2016-17	Projected 2017-18	Difference from 2015-16 to Projected 2017-18
Certificated Salaries	\$2,128,394	\$2,821,663	\$2,478,764	+\$350,371
Classified Salaries	\$657,671	\$743,431	\$900,332	+\$242,661
Benefits	\$936,306	\$1,375,921	\$1,611,110	+\$674,804
Materials and Supplies	\$46,248	\$64,121	\$39,303	-\$6,945
Services, Contracts and Operating	\$353,729	\$232,699	\$925,904	+\$572,175
Capital Outlay	\$0	\$0	\$0	+\$0
Subtotal Direct Costs	\$4,122,348	\$5,237,835	\$5,955,413	+\$1,833,065
Indirect Charges	\$0	\$0	\$0	+\$0
Total Expenditures	\$4,122,348	\$5,237,835	\$5,955,413	+\$1,833,065

Source: MOE documents

Rounding used in calculations

*Excludes the Program Cost Report Allocation

The district does not charge indirect costs to the special education resources. Indirect costs consist of business and administrative expenses such as budget, payroll, accounts payable, human resources, and data processing services provided to all programs. The true program cost is not shown if indirect costs are not budgeted and charged to the program. The California School Accounting Manual provides guidelines for allowable indirect cost amounts and how to calculate them.

The table below shows the district's December 1 special education pupil count and the expenditures per identified pupil count. Since 2015-16 the district's special education pupil count is projected to increase by 29 pupils, or 6.2%, and the expenditures per special education pupil are projected to increase by \$3,185, or 36.0%.

Pupil Count and Expenditures per Pupil

Description	2015-16	2016-17	Projected 2017-18	Difference from 2015-16 to Projected 2017-18
December 1 Identified Pupil Count	466	494	495	+29
Expenditures per Pupil	\$8,846	\$10,603	\$12,031	+\$3,185

Source: District special education enrollment reports (district of service) and MOE documents

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. Monitor attendance rates, including attendance rates in SDCs.
3. Review all of the contracted services charged to the special education budget and determine if it would be more cost-efficient to hire staff to provide these services.
4. Consider charging the full allowable indirect cost rate to the special education resources.
5. Establish monthly meetings of the director of special education, assistant superintendent of business services, and director of human resources that include pertinent topics such as the following:
 - a. Budget development
 - b. Budget monitoring
 - c. Maintenance-of-effort requirements
 - d. Positions charged to special education in the position control system
 - e. Additional staff requests or change in assignments
 - f. Nonpublic school and nonpublic agency contracts, invoices and new placements
 - g. Due process or complaint issues
 - h. Staff caseloads
 - i. Identified student counts
 - j. Identified needs

Appendix

A. Study Agreement



CSIS California School Information Services

**FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
DRAFT STUDY AGREEMENT
October 5, 2017**

The Fiscal Crisis and Management Assistance Team (FCMAT), hereinafter referred to as the team, and the Coalinga-Huron Joint 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 district's implementation of student success team, Response to Intervention, and Multi-Tiered System of Supports, and make recommendations for improvement, if any.
2. Analyze special education teacher staffing ratios, class and caseload size using statutory requirements for mandated services and statewide guidelines and make recommendations for improvement, if any.
3. Review the efficiency of staffing allocations of special education paraeducators and make recommendations for improvement, if any. Review the procedures for identifying the need for paraeducators and the processes for monitoring the assignment of paraeducators and determining the ongoing need for continued support from year to year. (Include classroom and 1:1 paraeducators.)

4. Analyze staffing and caseloads for related service providers, including but not limited to: speech pathologists, psychologists, occupational/physical therapists, behavior specialists, adaptive physical education and other staff who may be designated DIS, and make recommendations for improvement, if any.
5. Determine whether the district overidentifies students for special education services compared to the statewide average, and make recommendations that will reduce over identification, if needed.
6. Analyze whether the district provides a continuum of special education and related services from preschool through 22 years of age, including student placements in the least restrictive environments, and make recommendations for improvement, if any.
7. Review the organizational structure and staffing of the special education department in the district's central office to determine whether clerical and administrative support staffing are aligned with those of districts of comparable size and structure and make recommendations for greater efficiencies, if needed.
8. Review the district's unrestricted general fund contribution to special education and make recommendations for greater efficiency, if any.

B. Services and Products to be Provided

1. Orientation Meeting - The team will conduct an orientation session at the district to brief district management and supervisory personnel on the team's procedures and the purpose and schedule of the study.
2. On-site Review - The team will conduct an on-site review at the district office and at school sites if necessary.
3. Exit Meeting - The team will hold an exit meeting at the conclusion of the on-site review to inform the district of significant findings and recommendations to that point.
4. Exit Letter – Approximately 10 days after the exit meeting, the team will issue an exit letter briefly memorializing the topics discussed in the exit meeting.
5. Draft Report - Electronic copies of a preliminary draft report will be delivered to the district's administration for review and comment.
6. Final Report - Electronic copies of the final report will be delivered to the district's administration and to the county superintendent following completion of the review. Printed copies are available from FCMAT upon request.
7. Follow-Up Support – If requested 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 later than 18 months after completion of the study.

3. **PROJECT PERSONNEL**

The FCMAT study team may also include:

- | | |
|----------------------------|-------------------------|
| <i>A. To be determined</i> | <i>FCMAT Staff</i> |
| <i>B. To be determined</i> | <i>FCMAT Consultant</i> |
| <i>C. 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 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 \$16,200.

- 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 on 1300 17th Street, City Centre, Bakersfield, CA 93301.

5. **RESPONSIBILITIES OF THE DISTRICT**

- A. The district will provide office and conference room space during on-site reviews.
- B. The district will provide the following if requested:
 - 1. Policies, regulations and prior reports that address the study scope.
 - 2. Current or proposed organizational charts.
 - 3. Current and two prior years' audit reports.
 - 4. Any documents requested on a supplemental list. Documents requested on the supplemental list should be provided to FCMAT only in electronic format; if only hard copies are available, they should be scanned by the district and sent to FCMAT in electronic format.
 - 5. Documents should be provided in advance of fieldwork; any delay in the receipt of the requested documents may affect the start date and/or completion date of the project. Upon approval of the signed study agreement, access will be provided to FCMAT's online SharePoint document repository, where the district will upload all requested documents.
- C. The district's administration will review a preliminary draft copy of the report resulting from the study. Any comments regarding the accuracy of the data presented in the report or the practicability of the recommendations will be reviewed with the team prior to completion of the final report.

Pursuant to EC 45125.1(c), representatives of FCMAT will have limited contact with pupils. The district shall take appropriate steps to comply with EC 45125.1(c).

6. **PROJECT SCHEDULE**

The following schedule outlines the planned completion dates for different phases of the study and will be established upon the receipt of a signed study agreement:

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

8. INDEPENDENT CONTRACTOR

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

9. INSURANCE

During the term of this agreement, FCMAT shall maintain liability insurance of not less than \$1 million unless otherwise agreed upon in writing by the district, automobile liability insurance in the amount required under California state law, and workers compensation as required under California state law. FCMAT shall provide certificates of insurance, with Coalinga-Huron Joint Unified School District named as additional insured, indicating applicable insurance coverages upon request prior to the commencement of on-site work.

10. HOLD HARMLESS

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

11. CONTACT PERSON


Name: Lori Villanueva
Telephone: (559) 935-7500
E-mail: lvillanueva@chusd.org



Lori Villanueva, Interim Superintendent
Coalinga-Huron Joint Unified School District

10/10/17

Date



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

10-5-17

Date