



CSIS California School Information Services

Brentwood Union School District

Special Education Review

January 13, 2015



Joel D. Montero
Chief Executive Officer







January 13, 2015

Dana Eaton, Superintendent
Brentwood Union School District
255 Guthrie Lane
Brentwood, CA 94513

Dear Superintendent Eaton:

In September 2014, the Brentwood Union School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement to provide a review of the district's special education programs and services. Specifically, the agreement stated that FCMAT would perform the following:

Parent Involvement and Communication:

1. Analyze parent input regarding the opportunities for parent involvement, district outreach and parent communication that currently exist and make recommendations for improvement.
2. Recommend effective communication and problem solving models to build solid trusting relationships with parents, school staff, the special education department and the district office.

Program and Services:

3. Analyze current special education program and services and determine if a full range of services are provided consistent with state and federal guidelines.
4. Compare and analyze the roles, responsibilities and organizational structure of the district office staff such as the Director of Special Education, Program Specialists, Behavior Specialists, support staff and the school site administration and make recommendations for greater efficiencies and effectiveness, if needed.
5. Evaluate the effectiveness of the assignment process for teachers and assistants with recommendations for improvement, if needed.
6. Provide an analysis of staffing caseloads and ratios for all special education certificated and classified staff positions using the requirements for mandated services and statewide guidelines.
7. Review policies and practices related to 1-to-1 instructional aides including identification of need, fading, staffing, classroom support ratios, monitoring and

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tracking of resources, and make recommendations to improve efficiency and effective use of aides.

8. Review the professional development and training provided to all staff including but not limited to administration, certificated and classified staff at the district office and school sites and make recommendations, if needed.

Compliance:

9. Recommend a communication system within the district regarding special education litigation issues and outline the components of an effective resolution process that may reduce the threat of retaliation and reduce litigation and complaints.
10. Review compliance of state and federal regulations and the costs of due process, including settlement costs, parent attorney fees and district attorney fees and make recommendations for efficient alternatives.

Response to Intervention:

11. Provide feedback regarding the extent to which a Response to Intervention Model (RtI) is being implemented.
12. Provide an analysis for the identification process of students for special education, and assess the identification rates.

Fiscal:

13. Review the ERMHS and LCI revenue and billing and make recommendations.
14. Examine the costs of nonpublic school placements and the use of nonpublic agencies and make recommendations for greater efficiency, if needed.
15. Examine the use of Medi-Cal billing and the revenues and make recommendations.
16. Analyze the district's contribution to the general fund and make recommendations for greater efficiencies.

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

Sincerely,



Joel D. Montero
Chief Executive Officer

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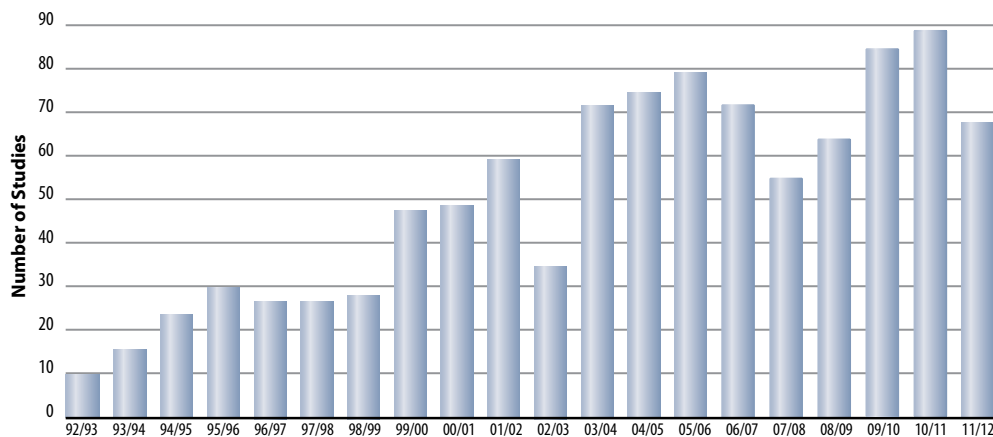
About FCMAT

FCMAT's primary mission is to assist California's local K-14 educational agencies to identify, prevent, and resolve financial 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 and efficient operations. FCMAT's data management services are used to help local educational agencies (LEAs) meet state reporting responsibilities, improve data quality, and share information.

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 local education agency 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.

Studies by Fiscal Year



FCMAT also develops and provides numerous publications, software tools, workshops and professional development opportunities to help local educational agencies operate more effectively and fulfill their fiscal oversight and data management responsibilities. The California School Information Services (CSIS) arm of FCMAT assists the California Department of Education with the implementation of the California Longitudinal Pupil Achievement Data System (CALPADS) and also maintains DataGate, the FCMAT/CSIS software LEAs use for CSIS services. FCMAT was created by Assembly Bill 1200 in 1992 to assist LEAs to meet and sustain their financial obligations. Assembly Bill 107 in 1997 charged FCMAT with responsibility for CSIS and its statewide data management work. Assembly Bill 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. Assembly Bill 2756 (2004) provides specific responsibilities to FCMAT with regard to districts that have received emergency state loans.

In January 2006, SB 430 (charter schools) and AB 1366 (community colleges) became law and expanded FCMAT's services to those types of LEAs.

Since 1992, FCMAT has been engaged to perform more than 1,000 reviews for LEAs, including school districts, county offices of education, charter schools and community colleges. The Kern County Superintendent of Schools is the administrative agent for FCMAT. The team is led by Joel D. Montero, Chief Executive Officer, with funding derived through appropriations in the state budget and a modest fee schedule for charges to requesting agencies.

Introduction

Background

The Brentwood Union School District is a member of the Contra Costa Special Education Local Plan Area (SELPA) and serves students in preschool through 8th grade. Students are then served by Liberty High School from 9th-12th grade. The district has 11 school sites, eight elementary and three middle schools, with the preschool located on one of the elementary school sites.

Brentwood has been experiencing population growth, with increasing student enrollment annually, and the district opened a new school in June 2013. Current district enrollment is 8,562, with 1,159 students served under an individualized education program.

In September 2014 the district requested FCMAT to review its special education programs and services.

Study and Report Guidelines

FCMAT visited the district in September and November 2014 to conduct interviews, collect data and review documents. FCMAT also conducted parent and staff surveys. This report is the result of those activities and is divided into the following sections:

- Executive Summary
- Parent Involvement and Communication
- Program and Services
- Compliance
- Response to Intervention
- Fiscal
- Appendices

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 his employer but was working solely as an independent contractor for FCMAT. Each team member reviewed the draft report to confirm accuracy and achieve consensus on the final recommendations.

Executive Summary

FCMAT was requested by the Brentwood Union School District to study the district's special education programs in five major areas: parent involvement and communication, program and services, compliance, response to intervention and fiscal. Parents and community members participated and provided input throughout the process. Staff members were open to finding ways to improve the overall functions and service delivery to special education students.

The broad scope of this study gave FCMAT the opportunity to provide in-depth analysis of all essential aspects of the special education program operation as a unit and department. There is a conflict of leadership roles and responsibilities between the special education program staff and the school principals. Both staff and parents expressed frustration over the confusion regarding who is in charge of special education program decisions and the inconsistent messages that occur as a result.

The special education program lacks effective leadership and has been subject to much litigation. The lack of leadership has led to inconsistency, disorganization, confusion over policies and procedures and a lack of direction to school sites. There has been high employee turnover in certificated and classified instructional staffing as well as designated related services providers. Both parents and staff expressed frustration and a lack of confidence in the special education department, which was confirmed by a finding of low staff morale.

Parents and staff expressed concerns over poor communication among parents, schools and the district. In the absence of an informal process to resolve special education issues, the district continues to experience an increase in formal complaints and requests for due process hearings. This level of intervention is costly for the district and parents.

The district may want to consider the use of an independent consultant for at least one year to support orderly change, mediate conflicts, track problem areas and provide a neutral third party to operate with absolute confidentiality.

Parents report that in general, students' individualized education programs (IEPs) are well developed. However, program services and supports outlined in the IEP are not delivered in a timely manner. Hiring delays for instructional assistants have left many students without support services from several weeks up to a few months.

FCMAT analyzed the organizational structure of the special education department and made recommendations to ensure effective clerical, program and administrative support.

FCMAT confirmed that the special education department has not provided leadership to allocate special education resources and has not used its leadership authorization and responsibility to establish accountability to ensure the provision of special education and related services to students. There is no systematic method to assign assistants for each school year or to ensure that an aide who is assigned to one student (a 1-to-1 aide) follows the student to support the transition between grade levels. Once hired, assistants often remain at the school site in other positions or assigned in various locations with inconsistent hours. Instructional assistants are hired for a minimum of 15 minutes and a maximum of six hours to a site or placement. Reorganization of the special education department by position and reporting structure would help strengthen central control and fiscal oversight of its budget and resources.

The district offers a continuum of special education programs and services; however, it does not meet the mandates of least restrictive environment. Transitions are not efficiently, consistently or effectively completed. Several students are served by a nonpublic agency.

The special education department does not use a clearly defined staffing formula. The district was unable to provide consistent data. FCMAT has made recommendations regarding staffing reductions and increases to balance the staffing structure of the department.

The identification rate for disabled students is 13.5%, as compared to 11% in the state. The philosophy behind Response to Intervention (RtI) models is that the effective use of RtI should decrease the need for special education services. Since the identification rate is higher in Brentwood than the state, the district should evaluate the effectiveness of its RtI program.

The effectiveness of special education programs can be measured by the degree to which programs and services are consistently delivered as outlined in the IEP. Delays in the hiring process combined with systemic administrative problems in the special education department have impeded the district's overall effectiveness in this area. This can create compliance problems for the district if not addressed. The second measure is the degree to which staff is trained to support the unique needs of special education students. Both parents and staff report the need for more training at many levels, including site principals, parents, instructional assistants and teachers.

The use of 1-to-1 instructional assistants in special education has increased in districts across the state. This can significantly affect limited resources for any district. Written criteria and procedures for the use of 1-to-1 instructional aides help IEP teams to determine the needs of students and assist districts in managing resources. The SELPA has a procedural manual that describes the process for 1-to-1 aides. The district recently drafted additional procedures for establishing the need for 1-to-1 assistants. A number of findings indicate that the transfer and hiring process for instructional assistants needs to be reviewed. Greater efficiency could be achieved, which would result in a more consistent and timely response to student needs for coverage and support.

Fiscal data regarding revenues and expenditures related to mental health funding, also known as Educationally Related Mental Health Services (ERMHS) (SACS resource codes 3327 and 6512), were reviewed. No anomalies were noted. The district receives no Licensed Children's Institute (LCI) revenue, as there are no facilities within district boundaries.

Students with special needs require a variety of services provided by various service providers. To determine personnel needs annually, a document with required level of services is necessary. The special education department was not able to provide a list of required special education services by student. This type of list should be used to determine total positions and materials necessary to meet students' needs, and to adequately inform the special education budgeting process.

There is no documentation, based on the previously mentioned lack of a list of all required special education resources, to justify hiring decisions or budget adjustments. There is no evidence that staffing ratios are consistently applied to all special education positions.

Because there is no list of required positions from the department, utilization of a position control system that involves coordinated review and approval by the special education, human resources and business services departments is not currently possible.

Findings and Recommendations

Parent Involvement and Communication

Children who are identified with special needs require a high level of participation and communication between home and school. FCMAT found through parent interviews, meetings and surveys that an active and engaged segment of the Brentwood parent and community population lack confidence and trust in the district, resulting in due process actions, complaints, and a high level of frustration.

A survey was provided by mail to every parent of a disabled student. The survey was conducted both in English and Spanish. The district reports a total enrollment of 8,562 in its 2014-15 CBEDS report. The 2014-15 total special education student population is reported as 1,159. The district mailed 1,198 surveys to parents of disabled students including those in district programs, those enrolled in Contra Costa County Office of Education programs and those enrolled in nonpublic schools. A total of 141 surveys were received from parents for a total survey response of 11.7%. There were 125 surveys completed in English and 16 surveys completed in Spanish. The returned surveys were transferred directly to FCMAT without district review. The parent survey was not intended to be a statistical instrument. It was designed to evaluate district services and obtain key information from parents whose children attend special education programs on their degree of understanding of the special education delivery process. A copy of the parent survey is included as Appendix A to this report.

In addition to the survey, FCMAT facilitated two parent and community meetings in a community location outside the school district. District administration purposely did not participate in either meeting. A total of 32 participants attended; some attended both meetings. FCMAT summarized the input from participants and considered it in the findings and recommendations of the report. The team also conducted an interview meeting attended by representatives and participants of various parent groups.

The responses from parents and community members in the two meetings included many concerns about the district's operation of special education and were significantly more critical than the responses in the parent survey. A representative sample of parent concerns focused on following themes:

- A lack of timely responses to parents
- A lack of cultural empathy and respect for parents
- A lack of consistency among district schools in special education instruction and intervention
- Confusion over the makeup of and participation in various parent support or advisory groups operating in the district
- A lack of faith or trust in the administrative leadership of the district's special education services

Specific comments from those meetings included concern that parents of disabled students do not trust that they receive accurate information on how their children are doing in school. They feel it is necessary to observe their children in the classroom, but feel they do not have equal access to parent observations in school as do other parents. Parents commented that communication from the district is poor and inconsistent. They feel they must hire attorneys to be taken seri-

ously by the district. Parents stated that the district needs training in empathy and understanding the parents of disabled students. Parents feel the staff do not understand cultural differences and do not communicate with parents of other cultures as effectively as they do with those who speak the English language. They feel teachers should be empowered to have relationships with parents and to have confidence in their own competence. Parents expressed a need to change the culture of the district and to reduce the use of attorneys on both sides of disputes. Parents felt an implementation plan should be created for this transitional change and should involve a third party consultant or independent agency.

The results reported above show some discrepancy between the results of the parent surveys and the results of the direct input sessions with parents and community members on the quality and satisfaction with special education services and operation in the district. Clearly a higher percentage of completed surveys reflect satisfaction with many aspects of special education service delivery. The opposite was true for the clear majority of parents who attended the two open meetings.

In 1975, Congress passed Public Law 94-142, which guarantees a free appropriate public education (FAPE) to all disabled children. PL94-142 and the subsequent revisions of the Individuals with Disabilities Education Act (IDEA) are based on the fact that assessments as to whether a child is receiving a free appropriate public education (FAPE) are entirely individual. When parents and their advocates have concerns regarding the provision of FAPE to their children at a level that rises to ongoing litigation, it makes no difference that they may represent a minority of the parents whose children are receiving special education services. A district in these circumstances must choose whether to engage in the individual defense of each case of FAPE or simultaneously commit sufficient resources to identify the causes of the parent issues and invest in systemic solutions that will result in an overall improvement of the provision of FAPE to all disabled students.

In interviews with staff from the district office level from principals to teachers and instructional assistants there is a consistent report that the working climate in the district is one of unrelenting scrutiny from parents and the community. Staff feel they operate only in a reactive climate and are always on the defensive. They also feel an absence of leadership in terms of what to do and how to respond in the wake of this pressure. Both administrative and teaching staff feel there are few or no guidelines for parents regarding classroom visits. They feel that both administrative work time and teaching instructional time are lost to the high rate of lengthy visits. They also report a loss of instructional and preparation time due to unusually lengthy IEP team meetings.

The staff survey reflects that 89.07% of the special education staff feel there are increased parent demands and expectations over the last two to three years. 63.46% of the special education staff feel parent involvement is lacking. 62.41% of the special education teachers and staff believe the community does not value them. 60.94% of the special education staff do not feel consulted or listened to regarding decisions made about individual students' education and special education overall; 85.94 % feel there is a lack of clear communication of expectations by district administration; and 90.62% feel there is a lack of time for planning and collaboration.

In both surveys and interviews, parents and community members comment that their concerns are not addressed in a timely fashion, if at all. They feel there is little consistency in services, processes and procedures between the schools their children attend and that official answers from the district vary. Parents and community members express concern that the district provides minimal proactive parent training. Parents stated they feel they must provide such information and training for themselves. The survey results indicate that over 78% of parents feel no parent

training opportunities are made available or they don't know if they are available. Over 70% of parents feel the district does not provide or they are unaware of opportunities for parents to meet in support groups to share ideas and strategies. In interviews, parents and community members state they feel there is little instruction occurring so they must frequently visit the schools to observe and determine whether their child is receiving instruction.

During parent interviews at least three different parent groups were identified that are organized to support students with special needs. The discussion with parents about these groups reflected confusion regarding their official status with the district, which parents belong to or attend which groups, whether parents are selected or appointed for some groups, the basic purpose of each group and who holds operational responsibilities for each group. In follow-up interviews with various professional staff both within and outside the district, similar levels of confusion regarding parent groups were apparent.

Recommendations

The district should:

1. Initiate a comprehensive plan to improve relationships with parents and strengthen the delivery and operation of special education services at the most basic levels of IEP development and implementation.
2. Provide prompt and consistent communication and responses to parent questions and concerns. Increase clerical support in the special education department to assist with timely responses. Frequently update parents on trends, information and issues in special education through emails, parent meetings and trainings.
3. Provide staff professional development that demonstrates how to engage and communicate with parents and value cultural diversity.
4. Consolidate existing district-sanctioned groups into one clearly defined group that meets consistently to address changes, trends and issues in special education.
5. Clarify and establish procedures regarding an identified certificated case manager for each special education student. Have the case manager serve as the starting point of communication for each parent regarding questions and concerns for their child.
6. Establish a formalized process for appointment to the Contra Costa Special Education Local Plan Area Community Advisory Committee as required under California Education Code Part 30, Section 56190-56195. Also see Contra Costa SELPA procedures for the Community Advisory Committee in Appendix B to this report.
7. Per the SELPA guidelines and via the district's governing board, formally appoint parent(s) to the Contra Costa Special Education Local Plan Area Community Advisory Committee. Require the appointed representative(s) to report back to the governing board after each SELPA CAC meeting.

8. Develop procedures for response and communication with staff, including principals, that are implemented with clear and firm direction from special education administration.
9. Develop clear guidelines for parent observation. See CSBA Sample Administrative Regulation: Students AR 5020(a), Parent Rights and Responsibilities (Appendix C). Ensure consistent application of guidelines across the district. Communicate and foster inclusion of parents in their child's education and openness to parent visitation within established guidelines per Education Code 51100 and 51102.
10. Consider utilizing a transition facilitator in special education for at least one year to mediate conflicts, track problem areas and recommend changes to policies or procedures. Ensure that the transition facilitator functions independently of the special education department and school sites, reporting directly to the superintendent and school board without serving any other role in the organization.
11. Establish a district-sponsored advisory committee coordinated by the director of special education using guidelines approved by the governing board. Consider having the committee provide a quarterly report and an annual executive summary to the board as deemed necessary by the superintendent. Allow committee representatives to speak periodically at board meetings to review and discuss concerns parents have regarding service delivery. Ensure that the committee has a balanced representation of the range of disabilities, age/grades of students, and ethnicities. Ensure that the committee covers a wide range of topics including: curriculum development, fiscal planning, parent concerns, due process, parents' legal rights, the role of the school principal in special education, the role of the parent in the IEP process and general parent training. Request the committee to do a follow-up parent survey and assessment to determine parent training needs.
12. Host social events and multicultural celebrations. Have parents who represent the culture come to the classroom and share its importance with students.
13. Revise the special education section of the district's website to ensure it offers meaningful communication and outreach to Spanish-speaking families.

Program and Services

The Individuals with Disabilities Education Act (IDEA) is a federal law ensuring services to disabled children throughout the nation. IDEA governs how states and public agencies provide early interventions, special education and related services to all eligible infants, toddlers (preschoolers), children, and youth with disabilities up to age 22. Further, each state must ensure that a free appropriate public education (FAPE) is available to any individual disabled child who needs special education and related services even though the child has not failed or been retained in a course or grade and is advancing from grade level to grade level (34 CFR 300.101(c)).

A review of data and staff interviews indicate the district provides special education services to students from preschool age through 8th grade. In California, a child receiving services under Part C and eligible for services under Part B must have an IEP created and in place by the time the child turns 3 years old.

Preschool Program

Staff reported the district does not have regular meetings with the regional center (the agency that provides early intervention services) regarding transition from Part C to Part B of the IDEA. An effective and smooth transition is an essential part of the IDEA. The California Department of Education published the Handbook on Transition from Early Childhood Special Education Program in 2005 as a resource for the special education preschool transition from Part C to Part B and sections of Part B relevant to the preschool transition process and procedures. This handbook can be found at <http://www.cde.ca.gov/sp/se/fp/documents/ectransitn.pdf>.

Recommendations

The district should:

1. Review the preschool program and meet regularly with the regional center to learn about students who are transitioning to Part B.
2. Review and establish a process for students who are transitioning from Part C to Part B.
3. Provide a clear transition process and procedure policy.

Kindergarten-8th Grade Programs

State and federal laws mandate that students have the opportunity to be educated in a general education setting with their nondisabled peers, also known as the least restrictive environment (LRE), to the greatest extent possible. Compliance with this mandate is measured by the percentage of time a student is removed from the general education classroom and placed in a special education setting.

The U.S. Department of Education, Office of Special Education Programs has provided the California Department of Education (CDE) Special Education Division guidance and instructions on developing calculations to measure progress toward meeting the LRE provision of IDEA. Targets and corresponding benchmarks have been established in the State Performance Plan for IDEA 2004. There are three measures:

- A. In a regular class 80% or more of the day

- B. In a regular class less than 40% of the day
- C. In separate schools, residential facilities, or homebound/hospital placement

The table below from the CDE indicates that the district has not met the LRE goals. Students with special needs spend more time in specialized classrooms than in general education classrooms.

2012-13 District Level Special Education Annual Performance Report Measure for Brentwood Union Elementary School District

Measure	Total no. of students receiving special education (age 6-22)	No. of students in the environment	Percent of students in environment receiving special education	Target this year	Target met
A. >80%	953	616	64.6%	>76%	No
B. <40%		165	17.3%	<9%	No
C. Separate Schools		14	1.5%	<3.8%	Yes

Source: December 2012 CASEMIS submission items - district of accountability, age, and a compiled data field consisting of unduplicated federal school setting and percent in regular class. Retrieved from www.cde.gov, October 2014.

NOTE: Separate schools includes students in separate schools, residential facilities and homebound/hospital. It does not include students in correctional facilities or those that are parentally placed in private school.

The district provides a range of services to disabled students in kindergarten through 8th grade that include designated instructional services and general education; resource program/instructional support provider (ISP) and general education via push-in or pull-out model; special day class with mainstreaming opportunities, life skills or emotional disturbances (counseling education classroom); autism; full-inclusion program; and recently a model learning center classroom for kindergarteners providing 50% of the time in general education kindergarten class and 50% in special day class. This new class is piloted at one school site for the 2014-15 school year. The special education director would like to expand the learning center model to other school sites for the 2015-16 school year. The determination of which sites and grades has not been made at this time. Meeting CDE targets A and B has been challenging, as many students spend more time in specialized instruction than the state target percentages.

Staff reported inconsistency in the implementation of programs districtwide. The site administrators recommend the programs and materials, resulting in variation from one school to another. However, the intervention program is implemented differently at each site. Further, staff reported inconsistency due to high turnover of staff.

The high staff turnover and inconsistent implementation of programs have led to the lack of a districtwide process for articulation from elementary to middle school and middle school to high school. 76.57% of the staff who participated in the staff morale survey reported they have no control over everyday decisions regarding programs and services. Teachers are not allocated time to meet with stakeholders/IEP team members to discuss programs from elementary level to middle school and middle school to high school.

Programs developed at each site have not been reviewed to ensure their effectiveness and efficiency. The inconsistent implementation of programs among sites results in multiple IEP team meetings when a student is recommended for a program. As members of the IEP team, parents express concerns over the lack of opportunities to visit available programs their children may

attend. The district does not provide information regarding the available programs and has no articulation process.

The IEP team may recommend a student with special needs be placed in an appropriate county program or a nonpublic school as an option when considering the continuum of program options.

Recommendations

The district should:

1. Continue continuum of program options to meet the needs of students with special needs.
2. Provide clear program criteria for least restrictive environment.
3. Provide a clear articulation process for parents and staff when preparing for transition from one school to another, especially from elementary to middle school and middle school to high school.
4. Provide planned opportunities for parents to visit proposed programs to make informed decisions.
5. Collaborate with the high school district for a seamless articulation.
6. Establish criteria for program monitoring, determining program effectiveness, and accountability.
7. Provide ongoing training to staff and parents regarding research-based programs and approaches to teaching and learning.
8. Allow time for teachers to collaborate.

Organizational Structure and Staffing

In reviewing the roles, responsibilities and organizational structure of the special education department, FCMAT focused on ways to ensure consistent accountability and oversight to restore public and staff confidence. Brentwood has fewer supervisors in the special education department than most comparable districts. The average number of supervisors (directors, coordinators, program specialists, other supervisors) in comparable districts is 3.7. This does not include access to additional program specialist or supervisory support provided through the SELPA. Brentwood has 3.0 supervisors in special education. This number includes the two program specialists who function primarily as administrators and who are limited in their ability to provide the same type of service as typical program specialists (see Education Code Section 56368).

District	Staff	Special Ed Enrollment	General Ed Enrollment
Brentwood	3.0*	1159	8562
Sylvan	4.0	1179	8450
Hueneme	2.0	908	8442
Davis	2.0	813	8599
Novato	7.0	879	5766
Dublin	4.0	675	9193
San Leandro	4.0	1171	8673
Average	3.83		

*This number not included in the average.

In the two public input sessions with parents and community members the need was expressed for large-scale organizational change in the special education department, including in several key leadership positions. Attendees further noted a need for positive action and follow-through starting at the top of the district/department. Staff made many comments during interviews regarding inconsistent direction and follow-through from the special education department. Comments of this nature also came from other district departments, principals and special education service providers. 65.62% of the special education staff who completed the staff morale survey reported frequent changes in the special education leadership. Specifically, the staff reported a lack of expertise and leadership from the special education director and program specialists. Also, 54.69% of the special education staff felt there was a lack of support from the district office. Through the survey staff reported a lack of procedures and processes. Staff indicated their perception that there are no special education strategic plans for short- or long-term change.

Recommendations

The district should:

1. Establish the parameters of authority for special education leadership, with the superintendent's support and communication of the parameters to all departments and school site administrators.
2. Establish regular meetings of the director, program specialists and psychologists to specifically address operation issues and solutions. Include principals in implementing these solutions.
3. Streamline the decision-making process for special education to include the necessary interdepartmental communication between personnel, finance, curriculum, and school site principals.
4. Define the roles and responsibilities of principals and district special education administration including school psychologists. Develop a plan to effectively communicate those roles and responsibilities to the school site staff and parents.
5. Evaluate the need for additional department administrative staff.

6. Examine the program specialist role and job description to determine if new administrative job descriptions are needed or if changes should be made in title and role. See Education Code Section 56368 for guidance.
7. Create a supervision plan for special education. During its implementation, have the director report directly to the superintendent.
8. Schedule regular reports to the governing board by the superintendent on the progress on the action plan for special education.
9. Establish operating guidelines that require all calls and e-mail questions and requests to be responded to within 24 hours. If an answer is not immediately available, make contact to let the person know when they will receive a response.

Teacher and Instructional Assistant Assignments

The district reports it has a position control system that is coordinated and reviewed by the human resources, business, and special education departments. However, document review revealed inconsistent evidence of staffing reports and full time equivalencies. See further information in the Fiscal section of this report.

The special education department has no written or formal process for assigning teachers, related service providers or assistants. There is no clear staffing formula or process with which to build a staffing plan for all services and programs.

The special education teachers teach various types of programs. They teach preschool with an early childhood education specialist credential. There are special day class teachers as well as instructional support program (ISP) teachers, also known in other districts as resource specialists (RSP). Special education teachers are unaware of the assignment process. Because Education Code limits class size to 28 per 1.0 FTE under resource specialists, the district must determine whether it runs ISP or RSP programs. If the district runs RSP programs, it cannot allow caseloads over 28. However, if it formally operates ISP programs, then the caseloads are left up to the district.

The ISP teachers do not understand why they are not RSP teachers. They are told the cap on the caseload is the same. According to the district average, the ISP teachers are within the 1:28 required RSP caseload, although caseloads among the ISP teachers vary greatly. If the district wishes to capitalize on the ISP program, it may want to consider a formal change and teachers may teach more than 28 students for any amount of the school day.

Some ISP teachers also support the district's RtI and core curriculum classes or a study skills class for general education students. This should be considered in determining their caseloads, and these teachers should not be 100% funded by special education.

Staff report that some sites have a wide variety of services while other sites do not and may be challenged with trying to make a student fit a school program.

District staff reported that the human resources and special education departments begin discussing hiring needs for the following year beginning in December and January. The special education director reviews students matriculating into the next grade, trends, potential incoming students, etc. Toward the end of January the director determines needs for the following school

year as closely as possible. Those projections are taken to the chief business official and then to Cabinet if additional classes, teachers, assistants, or other service providers are needed. The district develops a spreadsheet of all staffing and classes in February, which is taken to the board for approval.

District office staff reported there is an informal caseload practice of assigning one 6.0 hour aide for every 1 full-time equivalent (FTE) ISP teacher. Staff also reported that the caseload for ISP teachers is 1 FTE to 28 students. The special education director may assign 1.5 FTE to a school site if there is a larger grade span. However, district-provided documents and reports from school site staff do not reflect that reported practice.

District staff reported that instructional assistants are the largest group of employees in the district, with an increase in the number of hours and assistants being hired over the past two years. The human resources and special education departments do not utilize consistent hiring and decision-making practices. Special education assistants are hired from .25 hours per day to a maximum of 6.0 hours per day. Assistants are hired at the minimum hours possible. They are assigned either as classroom assistants or the specific times of day requiring assistant support as indicated in the IEP. For example, if an assistant is needed at the beginning of the school day until the end of recess time, which is two hours, the assistant is then hired for the two hours. As few as two or as many as eight assistants can be assigned per day in one program. This creates inconsistencies, ineffectiveness, and does not allow for clear communication among teachers and assistants.

District-provided documents and interviews of staff show no consistent processes or procedures for determining staffing levels and assignments. When candidates for aide positions are initially interviewed, they are asked a series of general questions that are not specific to 1-to-1 assistants. When assistants are initially assigned to a site, they start work with only the information that the special education teacher at the site provides them about their situation. In cases where assistants are required to help with more involved needs such as the toileting or transferring of a student, training usually consists of another aide at the site walking the new aide through the process. Assistants are quickly left on their own.

The district employs a pool of temporary substitute instructional assistants for short-term duty when a student moves into the district with 1-to-1 support identified on their IEP, when behaviors of a student are at a level the teacher needs to assess for additional assistance per IEP, or there is a job opening. Staff reported that the program specialists control the aide placement, yet principals request the assistants for the schools and students.

Staff reported, but data was not found, that substitutes are provided for classroom instructional assistants only after the assigned assistant is out for three consecutive days. No personnel are assigned to track when an assistant is absent and a substitute is needed. When a classroom assistant is absent, teachers are challenged with providing support to the students on their caseloads, especially if the students are scheduled to be integrated into a general education setting and supported by the assistant who is absent.

There is one category of instructional assistants; however, the job duties differ greatly. One instructional assistant may support a classroom of academic subjects, whereas another instructional assistant may be a 1-to-1 aide for a student with challenging behaviors or with multiple medical needs. Some staff report there is no process to assign staff according to training, desired placement, etc. Staff report that some assistants refuse to work in particular programs or with specific students.

Staff report that when principals or program specialists complete the paperwork to add staff to a school site or program, the director of special education does not process the paperwork in a timely manner or with the correct number of hours. Staff also report that the special education, business and human resource departments do not follow a process or procedure for adding and completing paperwork so that all departments are informed. The HR department is unaware if positions are waiting to be posted or if students are awaiting support providers. Staff reported that the district has always used the SELPA process to add instructional assistants to programs. However, there is no evidence that it is used regularly. District staff reported they have developed a draft addition to the SELPA process. This should include a rubric of needs, data collections, matrices, goal areas, a fade plan, an independence plan and a determination of how to end the more restrictive service. The additional aide support should be reviewed every three months for each child who requires this service. Adding assistants should be the last resort because it can limit students' independence and causes an additional district expense. 1-to-1 assistants should be provided additional professional development, as they often provide much instruction, behavioral programming and specific methodology implementation. They also need to be taught how to support independence.

Several staff reported a need for districtwide procedures to determine annual staffing needs, mid year staffing changes, and when and how to increase and decrease both certificated and classified staffing. The district has no annual process to determine the ongoing need for certificated and instructional assistants. As students move out of the district or are released from special education, the district does not reassign the assistants to meet new needs in the special education program. Assistants remain at the school site in other positions assigned by the principal.

Parents are highly frustrated regarding the district's inability to staff instructional aide positions in a timely way and in conformance with IEPs. This has a negative effect on the special education department and the district's credibility with parents. At the same time, the staffing assignments for teachers and assistants do not always match their credentials, skills and training.

Recommendations

The district should:

1. Utilize position control coordinated and reviewed by the human resources, business, and special education departments.
2. Develop a districtwide procedure to clearly define and determine certificated staffing needs for all employee groups and departments.
3. Develop a districtwide procedure to clearly define and determine classified (instructional assistant) staffing needs for all employee groups and departments.
4. Determine the definition of ISP as compared to RSP.
5. Develop clear definitions of class size ratios and caseloads for all special education programs and related service providers.
6. Develop procedures to determine how classified employees are placed at school sites, in programs and number of hours.

7. Develop procedures to determine the number of instructional assistants in a class or assigned to a school site.
8. Develop consistent program options among the school sites.
9. Develop consistent hiring practices from completion of the personnel requisition form through placement of the staff member.
10. Limit the use of temporary instructional assistants as long-term substitutes.
11. Consider whether two levels of instructional assistant positions are necessary due to the variety of programs, or whether staff providing support to the intensive needs population should receive a stipend.
12. Thoroughly review, develop, and implement a comprehensive special circumstance instructional assistance procedure, and regularly evaluate the needs of students who require additional supports.
13. Review the needs of students as they transition from elementary to secondary to ensure that the instructional aide supports follow the student.
14. Recapture resources annually as students move, exit the program, or as needs change. Utilize those resources to meet the ongoing needs of other disabled students.
15. Send an annual notice of assignment to assistants and teachers to establish communications among the department, principals and special education staff.
16. Monitor assignments to ensure that staff are appropriately certified and trained for the specific assignment for each school year.
17. Develop interdepartmental procedures for personnel, business and special education to ensure that instructional assistants are assigned to students in a timely way and in conformance with the IEP.
18. Streamline the hiring process to facilitate ongoing hiring of special education assistants.
19. Provide substitutes when assistants are absent in key areas, such as 1-to-1 assignments or self-contained SDC moderate/severe classes, or when an aide is out for an extended time.
20. Hire a specific number of permanent floater assistants that are trained and available to assist with difficult situations and during the hiring process for a new 1-to-1 aide to ensure immediate coverage for the student.
21. Eliminate the aide position at a school site when a student with a 1-to-1 aide leaves the district or no longer needs the aide.

Caseloads and Ratios

Through a variety of staff interviews, site visitations, written input and a staff morale survey, FCMAT gathered information to assist the district with its request to analyze necessary staff support and services. All staffing caseloads reported and ratios are taken from data developed for the 2014-15 (current) school year. The staff morale survey is Appendix D.

The special education, human resources and business departments provided multiple staffing charts and lists that were inconsistent among the departments. The review of staffing ratios is primarily based on the information gathered by the special education department during this study.

Survey results show that 87.50% of the special education teachers and related service providers felt there was an increase in workload due to the IEP process and paperwork requirements. When the district develops a procedure to determine caseloads, workloads may need to be part of that procedure.

Occupational Therapists

Occupational therapists (OTs) provide service to students in whole class, small group, and 1 to 1. OTs also provide consultation and collaboration to the classroom teachers. School Services of California (SSC) has provided a guideline for best practices establishing that OT guideline as 1:45-55 ratio OT to student. The district employs 2.6 FTE occupational therapists who carry an average caseload of 67.7 students each. The district is understaffed by at least .6 FTE.

Program	No. of FTE	Caseload	SSC Guideline for Students per caseload	Average No. of Students
OT	2.6	176	1-to- 45-55	1-to-67.6

Source: School Services of California and district data

Staff reported if they had more time to manage cases, conduct classroom observations, and train other staff, they would be able to see more progress made with students and move more students to the consultation model. They also reported because of multiple repeated IEP meetings, they are required to cancel service sessions. Therefore, students are not making progress and minutes of service per IEP are not met.

Speech and Language Pathologists

The district employs 1.8 FTE speech and language pathologists for 3- to 5-year-olds in preschool. They are responsible for reviewing the referrals for all incoming 3-year-olds who may display speech and language delays. Students are assessed throughout the year as the child turns 3, and then again as the child matriculates into kindergarten to determine if continued services are required. Many students of preschool age receive 1-to-1 or small group instruction of two to four students in a group. The caseload requirement under Education Code is 1:40 maximum. The district ratio of speech pathologists to students in preschool is 1-to-73.8 students, which exceeds the Education Code maximum ratio of 1:40 (EC 56363.3) and leaves the district understaffed in the preschool by 1.5 FTE. The district employs 12 FTE speech language pathologists who serve as case managers for 641 K through 8th grade students. The district ratio of SLPs to students is 1-to-53.4. This meets the Education Code maximum ratio of 1:55 (EC 56363.3).

Provider	Number of FTE	District Total Caseload Ratio (Total FTE to Total Student Caseload)	District Average Caseload Ratio	Ed. Code Maximum Ratio (FTE to Student Caseload)
Speech Pathologists Preschool	1.8	1.8-133	1:73.89	1:40
Speech Language Pathologist K-8	12	12-641	1:53.42	1:45-55

Psychologists

The district employs 8.2 FTE psychologists charged to special education and serving all district students, for a ratio of 1-to-1044.1. The following table shows the district school psychologist staffing ratio compared to the statewide average compiled by the California Association of School Psychologists (CASP). It shows the district is correctly staffed. This statewide average is for psychologists who identify and assess students with suspected disabilities. It does not include psychologists with other duties assigned such as direct service provider for students with mental health needs.

Program	No. of FTE	Caseload	CASP Data for Students per Caseload	District Caseload Average
Psychologist	8.2	8562	1-to-1469	1-to-1044.1

Source: CASP and district data

School Nurses

The district has 1 FTE districtwide nurse for approximately 8,500 students. District staff interviews and data indicate the nurse provides support to students with IEPs, 504s and to the general population for daily medical needs required for all sites. Because school-age students may have allergic reactions to foods or may have diabetic needs or seizure activity, schools are contracting or hiring additional staff with medical experience such as licensed vocational nurses (LVNs) or registered nurses (RNs) working under the supervision of the districtwide school nurse. Although there is no mandated requirement, CASP reports the state's average nurse-to-student ratio as 1-to-2815. This places the district approximately two positions below the average.

Behavior Specialists

The district's behavior specialist position is unique in that it does not require a teaching credential nor a specific degree, license or certification. The duties include but are not limited to data collections, staff training, monitoring, behavior intervention plan development and fidelity checks, and other program development. The district's behavior specialist is assigned to the five autism classes and has no caseload requirement. Staff reported that program specialists and the psychologists have provided professional development and intervention plan development for the other special day classes in lieu of additional behavior specialists. Parents and special education staff report that the district needs to consider hiring behavior specialists to meet the demands of the growing population of autism and emotional disturbance.

Recommendations

The district should:

1. Consider hiring .6 FTE occupational therapist.
2. Consider hiring 1.5 FTE speech pathologist for preschool.

3. Develop procedures and practices for the psychologist duties and determine if the position is adequately staffed.
4. Consider hiring or contracting with two nurses (school nurse, LVN or RN) to meet students' needs.
5. Consider redefining the qualifications and duties of the behavior specialist position.
6. Assess the need for additional behavior specialist support in special day classes.

ISP/Resource Specialists

This district provides an instructional support program (ISP), which is known as a resource specialist program (RSP) in many districts. Usually districts alter the name of the program and description of services to maximize efficiency and not require caseload maximums. Staff report the district has not defined the purpose of the ISP differently from the RSP caseloads and descriptions. Therefore, data and information used in this report utilize the data and descriptions aligned with RSP.

The resource specialist position provides specialized academic instruction/intervention to disabled students in the general education classroom setting and as a pullout program. Education Code 56362 identifies the maximum RSP caseload as one teacher per 28 students. District data indicates that a total of 24 ISP teachers serve 568 students, for an average caseload of one teacher per 23.67 students. The middle schools are only 1.5 students per caseload under the Education Code maximum, yet the elementary schools are approximately six students per caseload lower than the Education Code maximum. The district could reduce program staffing by approximately 4 FTE. This would yield a savings of \$293,504 including salary and statutory health/welfare benefits.

Comparison of ISP/RSP Caseloads to Education Code Guidelines (EC 56362)

Grade Span	Total Teacher FTE	Total Students	Total Ratio	Education Code Guideline Ratio (FTE to Student Caseload)	# of ISP classroom assistants
Elementary	15	330	1:22	1:28	14.66
Middle	9	238	1:26.44	1:28	9.17
Total	24	568	1:23.66	1:28	23.83

Source: Education Code and district-provided data

FCMAT analyzed the allocation of instructional assistants in the RSP classrooms and found a similar pattern of overstaffing. Education Code 56362 (6)(f) states, "At least 80% of the resource specialists within a local plan shall be provided with an instructional assistant." The district tracks the allocation of instructional assistants using total hours per day of service rather than FTEs. FCMAT converted the total hours of instructional assistant allocation to FTEs using an average of six hours per day per instructional assistant, resulting in 23.83 instructional assistant FTE. Should the district reduce resource specialists according to Education Code, it could reduce the instructional assistants by four six-hour assistants, saving \$119,960.

The special education department lacks clear guidelines for assigning instructional assistants and lacks a clear procedure to determine the number of hours they work daily. FCMAT found that their daily assignments varied between .25 and 6.0 hours per day.

Moderate/Severe SDC Caseloads

The SSC guidelines for moderate to severe K-12 classrooms are one teacher per 8 to 10 students. The district's average class size is one teacher per 9.1 students, within the average of the SSC guidelines for moderate to severe classrooms although at the upper level of districtwide capacity. FCMAT analyzed the allocation of classroom-based instructional assistants in the moderate to severe classrooms, which indicated slight understaffing. SSC guidelines indicate two instructional assistants to each moderate to severe program. 24.7 classroom-based instructional assistants are assigned to support 13 preschool through middle school moderate to severe programs for an overall staffing ratio of 1.9 instructional assistants for every program.

Grade Span	Total Teacher FTE	Total Students	Total Ratio	SSC Guidelines (FTE to Student Caseload)	SSC Guideline: 2 assistants/ no. of classroom assistants
Preschool	3	30	1-to-10	1:8-10 p/session	6/4.2
Life Skills	3	35	1-to-11	1:8-10	6/5
Specific Skills Class-Autism	4	29	1:7	1:8-10	8/12
Specific Skills Class-ED	3	25	1:8.3	1:8-10	6/3.5
Total	13	119	1:9	1:8-10	26/24.7

Source: School Services of California

Mild/Moderate SDC Caseloads

The district operates a mild to moderate special day class service delivery option for disabled students at the elementary and middle school levels. This model provides instruction in self-contained environments with various levels of mainstreaming in general education classrooms. The Education Code does not indicate maximum caseloads for mild to moderate SDCs; however, SSC has developed recommended caseload guidelines of one teacher to 12 to 15 students. The average class size for mild to moderate programs in the district's elementary and middle schools is one teacher per 11.28 students. This falls within the slightly low average range of the SSC guidelines.

FCMAT analyzed the allocation of instructional assistants in the mild to moderate classrooms. SSC guidelines indicate one instructional assistant to between 12 and 15 students for kindergarten through 8th. 13.7 instructional assistants are assigned to support seven elementary and middle school mild to moderate teachers, which falls significantly above the SSC guidelines. The district could reduce the classroom instructional assistants by approximately six 6-hour instructional assistants, for a cost savings of \$187,032.

Grade Span	Total Teacher FTE	Total Students	Total Ratio	SSC Guidelines (FTE to Student Caseload)	SSC Guideline: 1 aide/ # of classroom assistants
Elementary	5	50	1-to-10	1-to-12-15	5/9.8
Middle School	2	29	1-to-14.5	1-to-12-15	2/3.9
Total	7	79	1-to-11.28	1-to-12-15	7/13.7

Source: School Services of California

Instructional Assistants

The district employs 93.85 instructional assistants using the 6-hour FTE formula, which includes both classroom instructional assistants and 1-to-1 instructional assistants. The assistants are non-union members and have one job description. They support students in a general education setting, SDC, ISP and through 1-to-1 services. Staff reported there is no specific practice to assign staff to programs or to students. The number of hours assigned also is inconsistent. The chart below shows the number of positions and the hours as separated by program. An additional chart provided for the specific special education program explains the number of support service provided. This chart reflects that there are more 1-to-1 instructional assistant hours than there are of classroom support personnel by double the number of positions. All data is from the 2014-15 school year.

Program	No. of teachers	No. of students	No. of aide total hours	Avg. 6-hour positions	Avg. assistants per class
SDC	20	198	233.8	39.00	1.95
ISP	24	568	143	23.83	.99
1-to-1 Students	N/A	69	186.3	31.05	.45

Note: 1-to-1 students are 6.2% of the total special education population.

Brentwood Elementary	FTE	Caseload	Site caseload average	SSC guidelines for students per class	SSC guidelines for assistants per class in hours	Aide hours	1-to-1 aide hours
ISP	1.5	37	24.7	N/A	9	9	0
SDC K-1	1	5	5	12-15	6	11	6
SDC 3-5	1	13	13	12-15	6	15	6
Total	3.5	55	15.7	N/A	21	35	12

Garin Elementary	FTE	Caseload	Site caseload average	SSC guidelines for students per class	SSC guidelines for assistants per class in hours	Aide hours	1-to-1 aide hours
ISP	2	35	17.5	N/A	12	12	
SDC – LC	1	12	12	12-15	6	12.25	6.75
Total	3	47	15.7	N/A	18	24.25	6.75

Krey Elementary	FTE	Caseload	Site caseload average	SSC guidelines for students per class	SSC guidelines for assistants per class in hours	Aide hours	1-to-1 aide hours
ISP	2	30	15	N/A	12	12	
SDC TK-2	1	7	7	12-15	6	9	
SDC 3-5	1	13	13	12-15	6	12.05	23.8
Total	4	50	12.5	N/A	24	33.05	23.8

Mary Casey Black Elementary	FTE	Caseload	Site caseload average	SSC guidelines for students per class	SSC guidelines for assistants per class in hours	Aide hours	1-to-1 aide hours
ISP	2	44	22	N/A	12	9.5	
SDC - SH	1	10	10	10-12	12	6	34
Total	3	54	18	N/A	24	15.5	34

Marsh Creek Elementary	FTE	Caseload	Site caseload average	SSC guidelines for students per class	SSC guidelines for assistants per class in hours	Aide hours	1-to-1 aide hours
ISP	2	41	20.5	N/A	12	12.5	
SDC – autism	1	8	8	8-10	12	15.5	12.5
SDC – autism	1	7	7	8-10	12	16.5	6
Total	4	56	14	N/A	36	44.5	18.5

Pioneer Elementary	FTE	Caseload	Site caseload average	SSC guidelines for students per class	SSC guidelines for assistants per class in hours	Aide hours	1-to-1 aide hours
ISP	2	35	17.5	N/A	12	12	
SSC – autism	1	6	6	8-10	12	1	24
SSC – autism	1	7	7	8-10	12	39.75	6
Total	4	48	12	N/A	36	52.75	30

Ron Nunn Elementary	FTE	Caseload	Site caseload average	SSC guidelines for students per class	SSC guidelines for assistants per class in hours	Aide hours	1-to-1 aide hours
ISP	1.5	31	20.6	N/A	9	9	
SDC – ED K-3	1	4	4	8-10	12	6	
SDC – ED 4-5	1	10	10	8-10	12	6	6
Total	3.5	45	12.86	N.A	33	21	6

Adams Middle School	FTE	Caseload	Site caseload average	SSC guidelines for students per class	SSC guidelines for assistants per class in hours	Aide hours	1-to-1 aide hours
ISP	2.5	88	35.2	N/A	15	16	
SDC – SH	1	13	13	10-12	12	12	33.75
SDC – SH	1	12	12	10-12	12	12	
Total	4.5	113	25.11	N/A	39	40	33.75

Bristow Middle School	FTE	Caseload	Site caseload average	SSC guidelines for students per class	SSC guidelines for assistants per class in hours	Aide hours	1-to-1 aide hours
ISP	3.5	104	29.7	N/A	21	21	
SDC – LH	1	14	14	12-15	6	12	
Total	4.5	118	26.2	N/A	27	33	

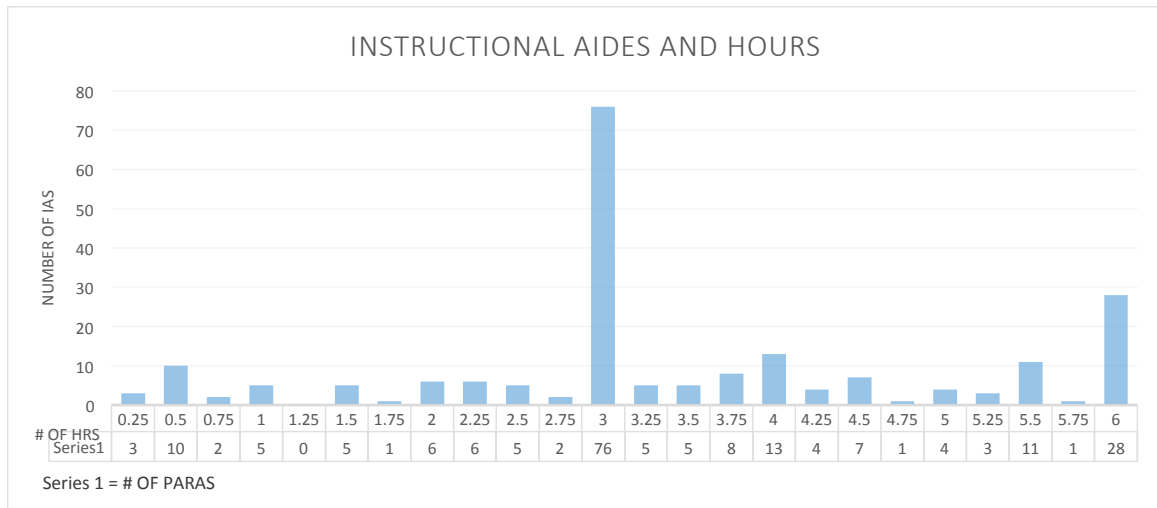
Edna Hills Middle School	FTE	Caseload	Site caseload average	SSC guidelines for students per class	SSC guidelines for assistants per class in hours	Aide hours	1-to-1 aide hours
ISP	3	91	30.3	N/A	18	18	
SDC – LH	1	15	15	12-15	6	11.75	12.5
SDC - ED	1	10	10	8-10	12	9	6
Total	5	116	23.2	N/A	36	38.75	18.5

Loma Vista Elementary and Preschool	FTE	Caseload	Site caseload average	SSC guidelines for students per class	SSC guidelines for assistants per class in hours	Aide hours	1-to-1 aide hours
ISP	2	32	16	N/A	12	12	
SDC - pre	1	12	12	1:5 ratio	9	6	3
SDC – pre	1	10	10	1:5 ratio	6	6	
SDC – autism	1	8	8	1:3 ratio	9	15	
Total	5	62	12.4		36	39	3

The chart below demonstrates there are approximately eight instructional assistant classroom positions districtwide, and if all 1-to-1 positions were eliminated, there are 31.05 positions. Many of the 1-to-1 assistants are required per IEP. Documents provided by the district were inconsistent regarding IEP-driven requirements and staffing requirements. Staff reports and documents provided indicated many sites included five to seven instructional assistants supporting a particular student throughout the day. This practice in the district yields inconsistent service delivery and management of program support and breaks down effective and efficient communication for staff and parents.

Totals	SSC guidelines hours total	District total	Total hours over guidelines	Total FTE (6 hour) over guidelines
ISP/SDC	330	376.8	46.8	7.8
1-to-1	N/A	186.3	N/A	31.05
Total		563.1	49.8	38.85

The chart on the next page demonstrates the number of hours instructional assistants are employed either by position and location or by total number of hours. It was difficult to separate the instructional assistant number of positions and number of hours worked due to the multiple locations to which instructional assistants are assigned. The chart demonstrates that 76 instructional assistants work consistently for a 3-hour duration in one location, while 28 6-hour instructional assistants work in one position and one location.



Recommendations

The district should:

1. Standardize a staffing plan for special education that reflects the total FTE funded by special education revenues, the class sizes and caseload numbers regardless of the type of program implemented at the sites.
2. Develop a staffing list that reflects the total FTE for all certificated and classified staff and aligns with the totals in the HR department and the function codes for special education in the business office, and accurately reflects the specific site assignments for all special education staff.
3. Develop a plan to monitor the class size, caseload and numbers of instructional assistants assigned to provide services.
4. Create and implement staffing formulas for all program options and services that align with the standards of practice, legal and contractual agreements.
5. Consider a reduction of 4 FTE ISP/RSP teachers districtwide for a cost savings of \$293,504.
6. Consider a reduction of six 6-hour assistants assigned to the mild/moderate SDC for a cost savings of \$187,032. Consider developing a clear and uniform plan for class size ratios and for utilizing classroom instructional assistants in lieu of 1-to-1 instructional assistants.
7. Consistently place staff in longer assignments with specific students or classrooms.
8. Develop districtwide hiring practices for instructional assistants.

1-to-1 Instructional Assistant Policies/Practices

The district employs 31.05 1-to-1 instructional assistants (calculated at 6-hour FTEs) that cost approximately \$24,145 this fiscal year based on information provided by district staff. These instructional assistants are distributed across all service delivery options from ISP to moderate to severe.

Throughout California the number of districts utilizing instructional assistants, 1-to-1, and special circumstance instructional assistants has greatly increased over the past few years. This has affected special education budgets and contributions from the unrestricted general fund; however, the services often aren't warranted or monitored.

The district had a \$292,134 increase in extra hours for special education assistants for 2013-14, with financial reports that project this will increase for 2014-15.

Assigning 1-to-1 instructional assistants to students without appropriately reducing and discontinuing this service, which is known as fading, creates a sense of dependence that can hinder a student's ability to access core curriculum. The district staff report they have drafted policies, procedures, and guidelines to monitor the use of 1-to-1 services and prevent them from being unnecessarily provided. This document should be analyzed for fidelity and effectiveness and then strictly implemented.

Many districts use the term special circumstance instructional assistance instead of the term 1-to-1 assistants to indicate that an assignment is temporary. Fading 1-to-1 services is crucial to ensuring student progress toward independence.

The district has an informal procedure to request additional instructional assistant support; however, some staff indicated these procedures are not always followed. An articulated system for assigning and fading classroom instructional assistants has not been established and implemented.

A lack of clear policies and procedures increases the potential for adversarial IEPs.

When an IEP team determines that a 1-to-1 instructional assistant is appropriate, the IEP team does not include a fading or exit plan for this service. Because of the previous lack of clear, formal policies and procedures, teachers are unclear about when they can decline a request. Further, once this type of assistant is assigned, the special education department has no formal process for re-evaluating the service to determine if it helps the student meet IEP goals. A sample manual for information and forms to assist with determination for special circumstance instructional assistance is included as Appendix E.

Recommendations

The district should:

1. Develop specific procedures to follow when a site or a parent requests an instructional assistant. This includes forms to be completed prior to the IEP that include parent input that will provide data to determine if additional support is needed.
2. Develop procedures to review all assistant assignments every spring for the following school year based on projected numbers and disabilities at each

school site, program delivery models, and school of attendance for students with 1-to-1 assistants or with significant health/behavioral difficulties. Make all assignment changes before the end of the school year.

3. Review all assistant positions once a process for decision-making is developed so these resources are utilized carefully and effectively.
4. Ensure that all new positions follow the decision-making process.
5. Collect data and develop fade plans for all students with 1-to-1 assistants to support independence.
6. Reduce the number of assistants assigned to a student and provide consistent support.

Professional Development and Training

The purpose of professional development is to improve the skills and knowledge of all teachers, administrators, and specialists involved in providing instruction to all students, including students with special needs. Available data from the district reveal that since 2012 there have been professional development sessions for special education staff in autism, assessment, eligibility, applied behavior analysis (ABA), new aide training, Special Education Information System (SEIS) training, administrative designee, and bullying. In 2013, the bulk of training came from the Contra Costa SELPA for SEIS training. In 2014, the Summer Institute was held and staff were paid a stipend to attend two sessions per employee. Staff members were invited to attend as many of these sessions as they would like on their own time.

A total of 76 certificated and classified general education and special education staff members attended these training sessions. A legal training session also was offered for administrators during the Summer Institute. The training session schedule is communicated to parents, staff, and community via newsletter. However, interviews with parents and community members indicated that since 2006, the district has not offered training to parents and when training was offered prior to 2006, it was not well attended. The district has offered professional development to its special education staff for 2014-15 in ABA, visual supports, preschool refresher, autism refresher, bullying and students with special needs, reading difficulties, social communication, and transition to middle school.

Both general and special education teachers were included in other districtwide professional development for report cards and assessments (Dynamic Indicators of Basic Early Literacy Skills - DIBELS, benchmarks) through the curriculum and instruction department. The special education staff at the district office decides what to teach and what professional development the special education staff may want. District staff indicated they hold regular job-alike meetings and use the time for training and review of special cases. Historically, job-alike meetings were for emotional disturbance and autism groups, but now all SDC teachers are included. Every month, SDC staff and teachers are allocated two hours for team meeting.

82.81% of the staff who participated in the staff morale survey felt there was a reduction in staff development availability. Specifically, staff requested additional professional development for SEIS, goal writing, working with autistic students, understanding visual and auditory processing disabilities, how to handle difficult IEP meetings, and how to effectively communicate with parents and advocates. Staff also reported they want regular emails or newsletters sent to all

special education certificated staff and site administration to distribute important information to all.

Staff reported new special education teachers have not been provided with training in case management, scheduling, writing IEPs, and their roles and responsibilities. Ensuring that staff receive and apply staff development will lead to greater cost efficiency, effective foundations for programs, and reduced litigation.

All special education files are kept at pertinent school sites, and the CASEMIS personnel do not have the hard copy to compare data for accuracy and accountability. The special education self-review data from the CDE identified several noncompliant procedural errors that require staff training. The district has no special education task force to review IEP documents to ensure legal mandates and procedural accuracy are addressed.

Recommendations

The district should:

1. Continue providing ongoing professional development that supports research-based instruction for all teachers, specialists, and instructional assistants.
2. Provide training to new special education teachers and other certificated staff that includes a resource binder for case management, information on scheduling, writing IEPs, and their roles and responsibilities.
3. Plan regular collaboration time with curriculum and instruction to provide professional development to all staff regarding special education.
4. Conduct an assessment among all parents to determine needs and interests regarding training and how to improve communication.
5. Provide training based on the needs assessment and collaborate with the SELPA for available resources.
6. Continue providing legal training regarding administrative designee, legal updates, and best practices and materials.
7. Consider providing SELPA-funded special education teacher release time to increase district participation in staff development.
8. Use the district website and the newsletter to inform all providers and parents of training opportunities, and include contact information.
9. Establish a task force that includes special education administrators, psychologists, elementary and middle school general and special education representatives to review IEP documents for accuracy and accountability.
10. Provide compliance training using previous self-review documents and requirements.

Compliance

Communication

As reflected by the results from surveys and interviews with staff, parents and the community, over a three-year period the district has been engaged in much highly publicized litigation. The nature of these issues has generated a climate of doubt and mistrust with parents and the community and even among staff regarding the provision of special education services in the district. The community continues to initiate new litigation even as this study is being conducted. A growing number of parents feel they must be represented by legal advocates in their IEP team meetings to have their concerns adequately addressed. Parents routinely request independent educational evaluations at the district's expense to counter the district's own evaluations. Parents openly state that they have to threaten or actually initiate due process proceedings and litigation to get their concerns adequately addressed by the district administration. Staff expressed concern over an apparent administrative pattern of acquiescence to most parent requests. An often-repeated theme through interviews with district administration, line staff and parents is the ongoing lack of consistent operational procedures in the delivery of special education services. The absence of such clarity and consistency negatively affects the most basic service delivery.

To proactively resolve parent concerns and complaints, some administrative staff members have received training in conducting facilitated IEP meetings. However, this resource is not evenly or consistently used throughout the district. In addition, the Contra Costa SELPA offers its districts the assistance of individuals trained in facilitated IEP meetings, yet the use of this resource has declined in recent years. There is little or no application of alternative dispute resolution (ADR) to address parent concerns prior to due process and litigation. ADR involves training staff, community members and parents to resolve disputes between the district and a parent that would otherwise be resolved through due process. ADR does not replace due process, nor does it prevent either a parent or a district from filing a due process action. The intent is to resolve the dispute informally while maintaining a working and nonadversarial relationship between the parties. Advocates and attorneys are not allowed in ADR sessions. Various staff members have expressed confusion or questioned the role of the district's special education legal representation in these matters.

Costs

The most effective steps in reducing the cost of due process cases are to have legally defensible IEP team meetings and IEPs, and to establish proactive communication with parents. A well implemented, effective communication plan can save the district hundreds of thousands of dollars in one school year. However, some cases are still likely to require one or more levels of mediation/ resolution.

The district has no formal system to track high-profile cases. A comprehensive database of information, correspondence, and the support provided for each potential case could reduce exposure to costly mediation and/or due process filings.

Education Code 56501(a) states as follows:

The parent or guardian and the public agency involved may initiate the due process hearing procedures prescribed by this chapter under any of the following circumstances:

- (1) There is a proposal to initiate or change the identification, assessment, or educational placement of the child or the provision of a free appropriate public education to

the child. (2) There is a refusal to initiate or change the identification, assessment, or educational placement of the child or the provision of a free appropriate public education to the child. (3) The parent or guardian refuses to consent to an assessment of the child. (4) There is a disagreement between a parent or guardian and a local educational agency regarding the availability of a program appropriate for the child, including the question of financial responsibility, as specified in Section 300.148 of Title 34 of the Code of Federal Regulations.

During the initial determination of whether to consider due process proceedings, the district should calculate the potential cost. It should also consider the amount it contributes to the SELPA for support with due process when the SELPA provides alternatives to due process; the cost of district attorney fees for pursuing and/or defending a due process filing; and the additional expense of any settlement agreements.

Staff reported because of the past civil suits in special education paired with the lack of special education administrative expertise, advocates at IEP meetings are requesting outside assessments, more services, different placements, etc. Staff are not provided district office support to defend their assessments or support their recommendations. Interviews with staff indicate district office staff make agreements with parents and advocates before IEP meetings as an attempt to resolve conflict, rather than working through the IEP process with the team. Site and support staff report that their opinion and expertise is not considered or valued at IEP meetings.

Site staff, district office staff and SELPA staff indicate that the facilitated IEP process has not been formally utilized. This process has been proven to support both parents and staff with the development of comprehensive and defensible IEPs. The SELPA can provide trained neutral facilitators, which will allow for collaborative, problem solving, trust building processes.

The district was unable to provide consistent documentation of all legal costs specific to special education over the past three years. These documents would include specific resource coding for tracking of all pre-legal and legal costs associated with settlements, district costs and parent costs. Documents provided did show one settlement in 2012-13 for \$9,050 and four settlements in 2013-14 totaling \$109,655.83. Due process documents showed total costs of \$129,910 for 2012, 2013 and 2014 to date.

Parents and advocates have filed compliance complaints and Office of Civil Rights complaints. The district provided evidence that in 2013, 65 allegations were filed with 10 findings to correct. Findings required memorandums and directives to staff, proof of procedures and two compensatory services to a student.

Recommendations

The district should:

1. Conduct meetings with staff prior to an IEP where additional resources may be discussed so decisions can be made as required at the IEP meeting.
2. Develop a process so that the special education management staff, including the director, attend IEP team meetings when needed to help resolve complex issues.

3. Train staff that regularly attend IEP meetings, including special education teachers, DIS staff, and site administrators, in methodology for effective IEP team meetings, such as collaborative and facilitated IEPs.
4. Train IEP administrators and administrator designees in special education legal requirements so they can effectively chair IEP team meetings.
5. Implement an ADR process and program. See Appendices E and F for information on ADR and Solutions Panel.
6. Develop a regular schedule for special education district office staff to meet that includes time to review questions from sites and parents.
7. Develop, train and consistently implement operational procedures for the provision of FAPE: assessment; eligibility; identification of strengths and needs; IEP goal development, implementation, monitoring and revision; and effective communication on these components of service delivery to all IEP team members, especially the parents.
8. Develop a system to disseminate consistent information regarding special education policy and procedures. Utilize a published and regularly updated procedural handbook, agenda items at job-alike and principals' meetings, and staff training for major changes. Set a target goal for year one that builds in accountability standards for the implementation of this system.
9. Provide professional training for conducting accurate assessments within specific disciplines. Include legal training for assessors on the required content of assessment reports. Prepare to defend district assessments and reports when a request for an independent education evaluation appears unwarranted.
10. Develop a formal system to track high-profile cases from alternative dispute resolution intervention to due process filings.
11. Maintain a comprehensive database of key information, correspondence, and student support for each potential case.
12. Establish timelines for proactive communication with families in an effort to resolve disputes at the lowest level.
13. Formalize communication templates (letters, resolution agreements, and mediation procedures) to minimize legal expense but ensure integrity of the system.
14. Utilize the facilitated IEP process as appropriate.
15. Formally train the certificated staff and administration in writing and conducting legally defensible IEPs and IEP team meetings; conducting, writing and defending assessments; and ensuring legal timelines are met.
16. Define the role of each IEP team member in avoiding due process and providing a response if it is initiated.

Response to Intervention

District data and staff report there are inconsistent procedures for developing interventions prior to referral for an evaluation for special education eligibility.

Student success team or student study team (SST) is a schoolwide positive approach to early identification and intervention. The team members include the student when appropriate, parents, teachers, and the site administrator. Together, they identify the student's strengths and challenges, and develop an improvement plan that documents how to implement interventions and collect data on the student's performance. As part of the process, all team members agree to follow the improvement plan. The team schedules follow-up meetings to provide continuous research-based strategies and approaches to improve the student's academic, social and behavioral experience in school.

Staff reported the exact process for a SST varies from one school site to another. This inconsistency may result in a student being referred for evaluation for special education eligibility at one site but not at another. The sites utilize the universal screening to identify at-risk students. There is no districtwide system to collect any SST data and no definitive guidelines for implementing a successful SST.

RtI is a general education function, not a special education function. Staff reported all site administrators have received RtI training. However, no districtwide RtI leadership team exists to guide its implementation, so the site administrators lack specific direction as how RtI should be utilized or the role of special education in this process. RtI is not implemented at all sites, and its implementation varies among the schools that practice it. Some sites utilize the push-in model; others have the special education staff work with at-risk students. Some schools have specific programs such as core curriculum replacement, and provide reading and mathematics instruction in small groups utilizing special education staff much like general education teachers. Some schools are implementing Common Core Standards for RtI. At some sites, the special education teachers are trained in Read 180 system, Language!, SRA, Read Naturally, Trans Math and Touch Math, and are expected to implement these materials as core curriculum replacement with all students who are identified as needing interventions. Staff reported that the special education teachers do not have access to the state-approved textbooks.

School districts and county offices of education are required to prepare a Local Control and Accountability Plan (LCAP). The LCAP must address actions to achieve eight State Priorities. Under the State Priority of Basic Services, sufficiency of instructional materials is addressed, including the Williams Act requirements such as "the degree to which every pupil...has sufficient access to the standards-aligned instructional materials as determined pursuant to EC Section 60119."

Education Code Section 60119(c)(1) states that "sufficient textbooks or instructional materials means that each pupil, including English learners, has a standards-aligned textbook or instructional materials, or both, to use in class and to take home. This paragraph does not require two sets of textbooks or instructional materials for each pupil." This specifically applies to four subject areas: reading/language arts, mathematics, science, and history-social science.

It would be extremely difficult for teachers to have adequate materials to address student needs without sufficient professional development. The district has not provided training in differentiated instruction in the four subject areas to all teachers as a means to meet the needs of a diverse student population. General education and special education teachers do not meet regularly to

discuss interventions and compare data to develop strategies and approaches to meet the diverse needs of the students, including those with special needs.

The district does not use RtI as part of the decision-making process for special education. The state has not developed criteria or policies for using RtI to determine eligibility for special education. Therefore, the traditional discrepancy model is utilized to determine eligibility even at the sites that utilize RtI. This lack of districtwide RtI model results in an increase in assessments and the percentage of students identified for special education. In addition, parents and parent advocacy groups push for special education assessments.

Staff members reported the special education staff selects the materials for core curriculum replacement, if asked. In the staff morale survey, 81.25% of those who participated in the study feel there is a lack of resources. Specifically, staff reported that there are inadequate materials in the classrooms and district office staff have not asked all special education staff about their curriculum needs. There have been significant delays in receiving promised materials and curriculum.

The curriculum and instruction and special education departments do not meet regularly to discuss interventions, materials and data collection.

Recommendations

The district should:

1. Clearly define a districtwide SST process to assist students at the school site so they can succeed without special education interventions.
2. Consider universal screening to identify at-risk students.
3. Develop a districtwide system of data collection and progress monitoring.
4. Provide training on differentiated instruction for a diverse classroom.
5. Develop clear criteria for a pre-referral system.
6. Plan regular collaboration time with C&I, site administrators and special education administrators to develop research-based interventions and materials districtwide.
7. Plan regular collaboration time with C&I, site administrators and special education administrators to develop a districtwide data collection and progress monitoring system.
8. Include teachers of special education in all RtI best practices and academic training provided to general education teachers as appropriate for their grade level and subject matter.
9. With all site principals, develop and document a plan to begin implementing a comprehensive RtI model.
10. Allow time for teachers to review data and plan for research-based instructions and interventions.

11. Ensure that all teachers of special education have the state and district approved curriculum and supplemental materials.
12. Establish a district-level leadership team to guide the implementation of RtI.
13. Develop a process to allow SST members and psychologists to use RtI as part of the decision-making process for referral to special education.
14. Provide training to parents on how RtI is implemented and used as a part of the decision-making process for referral to special education.
15. Evaluate the effectiveness of the current RtI strategies that affect the identification rate for special education.

Identification for Special Education

The district's identification rate for special education (PreK-8) is 13.5%, which is above the statewide average of 11%. The district operates a resource program (ISP) at every site. Nineteen self-contained special day classrooms (SDC) across the district provide opportunities for students to be mainstreamed into general education classrooms and one learning center model classroom at the kindergarten level. Additionally, the district provides a full inclusion program.

Some sites provide a RtI model, and the model varies from site to site. Staff reported that expectations for interventions are there, and additional staff are provided to implement universal assessment and interventions. Site administrators are the drivers of RtI. Staff reported that inconsistency in data collection and assessment results in overidentification of students for special education.

Staff reported that the SST process is site-based and a gateway to special education identification. The process is simple. The general education teacher initiates the meeting based on some data and usually without interventions. Generally, after one SST, a student is referred for special education evaluation. Sometimes, interventions are recommended to be implemented for six weeks with the expectation the data will be collected and presented at the next SST. However, the validity of the data is questionable. Follow-up with recommended intervention and monitoring is not systematic.

Staff, including principals and general education teachers, receive no formal training on the SST process. Board Policy 6164.1 refers to establishing systematic procedures for special education identification, referral, screening, assessment, planning of implementation, review, and triennial assessment. Administrative Regulation 6164.4 states, "All referrals from school staff for special education and related services shall include a brief reason for the referral and description of the regular program resources that were considered and/or modified for use with the student and their effect (5 CCR 3021)." The district lacks a board policy or administrative regulations that outline the referral process and procedures for SSTs and pre-referral criteria.

Recommendations

The district should:

1. Establish districtwide pre-referral interventions and support prior to referral for special education.
2. Implement RtI districtwide with consistency.
3. Provide districtwide data collection and progress monitoring to ensure RtI is implemented and students' needs are met.
4. Provide resources for staff to support their rationale for referrals.
5. Provide districtwide procedures for SST referrals and annual SST training for all staff.
6. Provide collaboration time for staff to review data and decisions.
7. Provide professional development in research-based instruction and intervention.
8. Audit the referral rate for school sites with high rates.
9. Develop and adopt a board policy and administrative regulation that outlines the referral process and procedures for SSTs that focuses on pre-referral general education interventions.

Fiscal

Mental Health and Residential Services

Costs of mental health and residential services have transferred to school districts through AB114, which was signed into law on June 30, 2011. Several sections of Government Code, Chapter 26.5 were amended or rendered inoperative, ending the state mandate on county mental health agencies to provide mental health services to special education students. AB114 requires school districts to be solely responsible for ensuring the provision of these services, such as residential placement room and board and counseling both in residential placement and in other special education programs. Funding is provided to SELPAs via Educationally Related Mental Health Services (ERMHS). Each SELPA determines how those funds are distributed to its member districts.

The district has specific account codes to track both revenue and expenditure of these funds. Fiscal data regarding revenues and expenditures related to ERMHS (SACS resource codes 3327 and 6512) were reviewed. No anomalies were noted. The district receives no Licensed Children's Institute (LCI) revenue, as there are no facilities within district boundaries.

Recommendations

The district should:

1. Continue to monitor revenues and expenses related to providing mental health services to students to ensure this does not add significantly to the general fund contribution to special education.

Nonpublic School and Nonpublic Agency Placements

District expenses related to nonpublic school (NPS) placements and nonpublic agency (NPA) costs are as follows:

Expense Category	Unaudited Actuals	Unaudited Actuals	Revised Budget*
	2012-13	2013-14	2014-15
Non-public school	\$ 554,281	\$ 741,987	\$ 775,344
Non-public agency	\$ 128,366	\$ 250,887	\$ 232,744
Total	\$ 682,647	\$ 992,874	\$ 1,008,088

*Budget data through 11/6/2014. Additional NPS/NPA contracts are likely to be added to the 2014-15 budget.

Source: District information

Expenses related to these services rose by \$310,227 from 2012-13 to 2013-14. While projections to date indicate that expenses are not expected to rise significantly in the current year, district staff acknowledged that not all placements for 2014-15 are in effect. The special education department was unable to provide a list of required special education services related to each IEP. This data is necessary to analyze the cost effectiveness of utilizing NPS placements and NPA services.

Approximately 8-10 preschool children attend an NPS, Lynn Center. The cost per child annually, not including summer services, is approximately \$22,000. Once the student matriculates

to kindergarten they transfer back to the district. Transitions from NPS to district are often emotionally challenging for families and young children.

The district does not use CDE-approved NPAs for all of the contracted services such as evaluations and therapy. Some providers are under contracts that are not as robust as an NPA contract. An agency must be on the state-approved list to be an NPA. This assures the district that the agency has met certain criteria including staffing credentials and insurance.

Recommendations

The district should:

1. Closely monitor the cost of NPS placements and NPA services, and analyze the cost effectiveness of utilizing these services.
2. Analyze the total cost of operating an additional special education preschool class and determine the fiscal effect if students at Lynn Center were served by the district.
3. Continually evaluate its ability to serve any of its students who receive alternative placements and services.
4. Ensure that an NPA is used when a contractor is required.

Medi-Cal Billing and Revenues

District staff report that the speech and language pathologists, occupational therapists, nurse and psychologist bill for Medi-Cal approved related services. Medi-Cal Local Education Agency (LEA) annual report financial statement data for July 2012-June 2013 was provided along with the Contra Costa Medi-Cal Collaborative Fund Reinvestment Plan for 2011-12. The district used the SELPA as its billing consortium for 2011-12 and then contracted with San Joaquin COE thereafter. Data showed the LEA received \$101,803 for 2012-13, with \$25,616 carryover, while expenditures were \$115,550, leaving \$11,869 in carryover. For 2013-14 confirmed actual revenues are pending; however, a preliminary report states the district's estimated revenues were \$73,763.

Year	2011-12	2012-13	2013-14
Revenue	83,541.57	101,803.00	73,763.00

Medi-Cal Administrative Activities (MAA) billing and expenses appear reasonable. The district has been notified by the MAA program that the district was potentially overpaid \$614,547 in 2010-11. Many districts in California have been notified of similar overpayments, and large-scale efforts to request a re-examination of MAA reimbursement methodologies are under way. Even if the overpayment is upheld at the current amount, the district may be able to offset most or all of the repayment from MAA funds it is to receive for the 2011-12 and 2012-13 fiscal years.

Recommendations

The district should:

1. Continue to utilize the San Joaquin COE for Medi-Cal billing.

2. Request that the San Joaquin COE provide a comparison to similar districts to determine the maximum revenue benefit.
3. Plan to decrease expenditures when carryover is depleted so the general education fund does not have to cover excess costs.
4. Join coordinated efforts to request a re-examination of MAA reimbursement methodologies, and monitor the potential district repayment obligations.

General Fund Contribution

Students with special needs require a variety of services from various service providers. To determine annual personnel needs, a document listing the required services is necessary. The special education department could not provide a list of required special education services by student that could be used to determine total positions and materials necessary to meet students' needs, and to assist with special education budgeting.

There is no documentation to justify hiring decisions or budget adjustments, or that staffing ratios are consistently applied to all special education positions.

Because there is no list of required positions, utilization of a position control system that involves coordinated review and approval by the special education, human resources and business services departments is not possible.

Source: District information and SELPA SEMB forms Special Education (SE)	Unaudited Actuals	Unaudited Actuals	Revised Budget*
	2012-13	2013-14	2014-15
Total SE expenditures	\$ 11,225,455	\$ 12,802,916	\$ 13,561,142
SE student count	1209	1211	1241
SE expenditures per SE student	\$ 9,285	\$ 10,572	\$ 10,928
Contribution	\$ 4,014,111	\$ 5,560,929	\$ 6,508,427
Contribution Percentage	35.8%	43.4%	48.0%
Additional SE transportation Contribution	\$ 452,292	\$ 599,550	\$ 600,000
Adjusted Contribution	\$ 4,466,403	\$ 6,160,479	\$ 7,108,427
Adjusted Contribution Percentage	39.8%	48.1%	52.4%
Beginning Balance SE reserves	\$ 763,229	\$ 734,040	\$ -
Decrease in SE Reserves adding to Contribution	\$ (29,189)	\$ (734,040)	\$ -
Full Contribution	\$ 4,495,592	\$ 6,894,519	\$ 7,108,427
Full Contribution Percentage	40.0%	53.9%	52.4%
*Budget data through 11/6/2014. Additional NPS/NPA contracts are likely for the 2014-15 budget.			

The district has traditionally not included special education transportation contributions or the use of special education reserves in its calculation of the total general fund contribution to special

education. To compare the true contribution to special education over time, use of reserves should be included in this calculation. Viewing contributions in that manner provides the following results:

Special education costs per student rose \$1,287 from 2012-13 to 2013-14, and by an additional \$356 comparing 2013-14 to the budget for 2014-15. Given the likelihood that additional NPS/NPA costs will be added to the 2014-15 budget, the costs per student in the current year should increase further. The percentage of contribution from the general fund to special education has risen dramatically, from 40% to 53.9%. The contribution percentage is likely to increase due to additional NPS/NPA costs in the current year.

Sources of the increase in special education expenses from 2012-13 to 2013-14 include:

- Approximately \$200,000 for one-time and retroactive salary increases.
- Approximately \$100,000 for adding a special education program specialist.
- Approximately \$300,000 in costs for special education assistants, due to one-time and retroactive salary increases and a marked increase in autism services.
- Approximately \$300,000 in increased total expenses for NPS/NPA services, including costs related to a new NPS program, Anova, for autism services.
- Approximately \$100,000 in increased legal settlement expenses.

The district has no systematic approach to fulfilling the terms of IEPs. HR and business services often find out about staffing needs and budgetary changes from information provided by sites, or in meetings with special education that occur well after changes have been made. Improving the timeliness of providing IEP-related resources to students will significantly increase trust among all stakeholders. The special education office relies on one position, the special education secretary, to handle all fiscal transactions and budgeting, implement all IEP-related requirements, set up and monitor invoicing for all NPS, NPA and county office of education student placements, do SEIS reporting, supervise special education-related CALPADS reporting, and coordinate numerous special education meetings and employee interactions. Based on reports received during the FCMAT site visit, a change in the requirements of the special education secretary position could significantly increase the efficiency of implementing services, and provide more accurate and timely budget information. A fiscal analyst position would be of benefit in handling these duties.

Duties for this new position could include, but not be limited to:

- Implementing and monitoring all special education-related contracts and invoices related to contracts.
- Interdistrict billing for regional services provided to out-of-district students.
- Verifying the special education accounting of services provided per each IEP.
- Preparing all necessary special education budget adjustments, personnel transaction forms and purchase orders.
- Analyzing and monitoring the entire special education budget for variances and reasonableness.
- Preparing and submitting all ERMS, Medi-Cal LEA and MAA billing.

The special education secretary should still have sufficient duties after the above are reassigned. A .50 FTE fiscal analyst position could fulfill the requirements. The special education department pays for additional clerical support that would not be needed if the fiscal analyst position is created. This clerical support cost \$13,279 in 2012-13 and \$14,985 in 2013-14, which could partially offset the cost of the new fiscal analyst position.

The Contra Costa SELPA changed its funding allocation model for member districts starting in the 2013-14 fiscal year. One significant change was from an off-the-top model that covered the costs for district students placed in county office of education programs to one that charges districts directly for students utilizing these programs. The district will eventually receive approximately \$500,000 more in annual revenue from the new allocation model after a phase-in period expires. However, the district is now responsible for paying for county office-operated programs under a new cost structure that is tiered based on the level of services needed for each student. This increased cost structure could lead to costs in excess of the additional revenue received.

Special education legal and due process costs, outside of settlement agreements, have varied over a three-year period:

Unaudited Actuals	Unaudited Actuals	Revised Budget
2012-13	2013-14	2014-15
\$ 98,644	\$ 45,481	\$ 133,615

The district has not tracked due process costs separately from other special education legal counsel. Doing so is considered a best practice to analyze the cost effectiveness of the district's approach to due process situations.

Recommendations

The district should:

1. Keep records in the special education department that list each student requiring services, including the specific IEP-related resources (services and equipment) for each student and the sunset date for each resource. Compile these resources into specific budgetary needs for special education.
2. Build the special education budget with justifications for resources tied to IEPs and agreed upon staffing ratios. Make budget changes throughout the year as services or materials are no longer needed or are added.
3. Have the special education, human resources and business services departments perform regular, coordinated position reviews throughout the year.
4. Include all special education costs to reflect the true general fund contribution to special education, including transportation. Recognize that deficit spending in the special education department, leading to a reduction in reserves, also is a contribution to special education.
5. Monitor the total special education budget per student, analyzing any increases for reasonableness. Update the 2014-15 costs and general fund contribution when all costs are available to understand if the contribution percentage is continuing to increase.

6. Create a new position, reporting to the business services department, potentially titled special education fiscal analyst. Place the person filling this position in the special education office.
7. Closely monitor costs of county office programs annually to ensure that costs and billings are reasonable.
8. Consider tracking due process data separately to monitor the effectiveness of the approach to due process, including the number of cases, the level of resolution, and the costs involved year by year.

Appendices

Appendix A – Parent Survey

Appendix B – Community Advisory Committee (CAC)

Appendix C - CSBA Sample Administrative Regulation, Parent Rights and Responsibilities

Appendix D – Staff Morale Survey

Appendix E – Special Circumstance Instructional Assistance (SCIA)

Appendix F – Alternative Dispute Resolution (ADR)

Appendix G – Response to Intervention (RtI)

Appendix H – Study Agreement

FCMAT Study: Parent Survey - Brentwood Union School District

The Brentwood Union School District is conducting an independent review of their Special Education Programs. The review is being conducted by Fiscal Crisis and Management Assistance (FCMAT). During this review there will be many opportunities to gather input from parents, Board Members, and staff. One phase of this input for parents is this survey. It will be helpful to know what you and your child's experiences have been when you have received special education services and programs from the district. Your concerns and experiences will assist the independent reviewers in gathering accurate information about the programs and services in special education.

Please check Yes, No or Don't know to each question.

***1. Do you understand the reasons why your child receives Special Education services?**

- Yes
 No
 Don't know

***2. Was an assessment plan presented to you in such a way that you fully understood the tests that were being given and why?**

- Yes
 No
 Don't know

***3. Were your child's strengths considered in the assessments?**

- Yes
 No
 Don't know

***4. Were the results of your child's assessment used to develop an Individualized Education Plan (IEP) for your child?**

- Yes
 No
 Don't know

***5. Did you have an opportunity to express your concerns about your child's learning in the IEP meeting?**

- Yes
 No
 Don't know

FCMAT Study: Parent Survey - Brentwood Union School District

***6. Do your child's teachers have an understanding of his/her learning needs?**

- Yes
 No
 Don't know

***7. Did the IEP team discuss a range of options available for special education programs and services for your child?**

- Yes
 No
 Don't know

***8. Did you feel like an equal member of the IEP team?**

- Yes
 No
 Don't know

***9. Were the services described in the IEP delivered?**

- Yes
 No
 Don't know

***10. Were the services described in the IEP effective?**

- Yes
 No
 Don't know

***11. Do you feel that any of the concerns you had for your child's education were considered in the IEP?**

- Yes
 No
 Don't know

FCMAT Study: Parent Survey - Brentwood Union School District

***12. Do you receive consistent communication regarding your child's progress in special education programs and services?**

- Yes
 No
 Don't know

***13. When you contact the school regarding your child's progress, do you receive a timely response?**

- Yes
 No
 Don't know

***14. Is your child's general education teacher aware of his/her IEP and unique learning needs?**

- Yes
 No
 Don't know

***15. Do you feel that the school is listening to your concerns as a special education parent?**

- Yes
 No
 Don't know

***16. Do you know who to contact to get special education issues resolved?**

- Yes
 No
 Don't know

***17. Do you feel that you have a solid, trusting working relationship with the special education department?**

- Yes
 No
 Don't know

FCMAT Study: Parent Survey - Brentwood Union School District

***18. If you speak a language other than English, do you receive information from the school in your native language when you request it?**

- Yes
 No
 Don't know

***19. If you request a language interpreter for your child's IEP meeting, is one provided?**

- Yes
 No
 Don't know

***20. Does the district provide opportunities for parents to meet in support groups with other parents to share ideas and strategies with their children with special needs?**

- Yes
 No
 Don't know

***21. Are parent training opportunities available to parents of children with special needs?**

- Yes
 No
 Don't know

***22. Sometimes parents are confused by the IEP process, is there anyone in the district that can help parents that have questions or concerns about the process?**

- Yes
 No
 Don't know

***23. Is the district open to parent input on special education issues?**

- Yes
 No
 Don't know

FCMAT Study: Parent Survey - Brentwood Union School District

***24. Please check the grade level for your special needs child or children if you have more than one child receiving special education services.**

- Preschool
- Transitional Kindergarten
- Kindergarten
- 1st-3rd grade
- 4th-5th grade
- 6th-8th grade

***25. Please note which of the following entities provides special education services for your child. If you have more than one child who resides in the Brentwood Union School District, please check all that apply.**

- BUSD - Brentwood Union School District
- COE - County Office of Education
- NPS - Non-Public School

26. This area is for you to comment specifically on any of the items where you indicated "no". When commenting, please identify the response number.

Thank you for your participation.

Special Education Community Advisory Committee APPLICATION FOR MEMBERSHIP

Special Ed Parent Representative

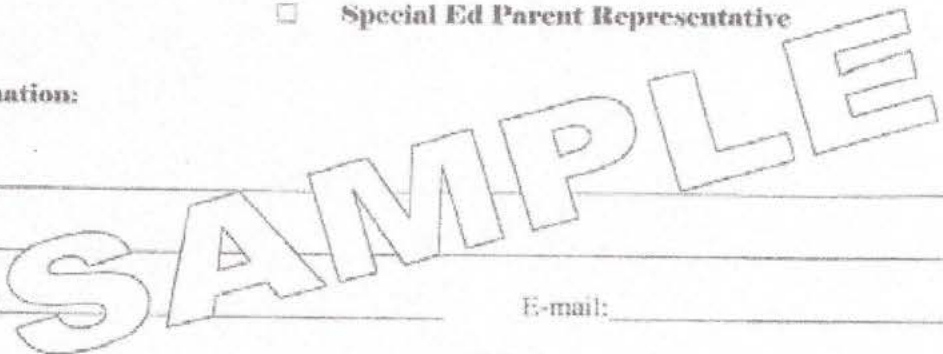
General Information:

Name: _____

Address: _____

Home Telephone: _____ E-mail: _____

Work Telephone: _____ Cell phone: _____



Educational background: (Response optional.)

Additional Information:

1. Have you been a member of any _____ School District school-based or District committees?

Yes No If so, in what capacity?

2. Are you, or have you or a member of your immediate family, ever been employed by the _____ School District?

Yes No If yes, please explain:

3. Have you attended a/several Special Education CAC meeting(s)?

Yes No

4. List present or past membership in any community service (e.g. volunteer, civic, or youth) organizations.

Qualifications:

1. Please indicate the contributions that you can make to this committee.

SAMPLE

Please answer the following questions:

1. How long have you been a resident within the _____ School District?

_____Years _____Months

2. Do you have any children or grandchildren who now attend (or have attended) _____ School District schools?

Yes No

Which schools & comments:

3. Explain why you would like to be appointed to this committee. (You may attach additional pages, if needed).

4. Are you a vendor, contractor, or consultant of _____ school District?

Yes No If yes, please explain.

5. Are you available to attend Special Education Community Advisory Committee meetings on Tuesday evenings?

Yes No If no, please explain.

SAMPLE

Certificate of Applicant:

All answers and statements in this document are true and complete to the best of my knowledge and belief.

Signature: _____ Date: _____

Completed and signed applications must be received by the Special Education Department, School District, _____, faxed no later than Monday, April _____, _____ . Please be aware completed applications are public records available for public review.

Nominees' names shall be submitted to District Superintendent for selection and recommendation to the Board of Education that shall make the final appointments on April 26, _____ . If you have questions, please call the district office and ask to speak with _____ Special Education and Facilitator for the Special Education Advisory Committee.

Appendix C

CSBA Sample Administrative Regulation

Students AR 5020(a) PARENT RIGHTS AND RESPONSIBILITIES

Parent/Guardian Rights

Note: Education Code 49091.10-49091.19 and Education Code 51100-51102 delineate explicit rights of parents/guardians regarding the education of their children. Some of these rights may be addressed in other policies and regulations. However, districts may choose to adopt this separate section on parent/guardian rights in order to compile these provisions in one location as provided in the following optional section.

Pursuant to Education Code 51101, the rights provided for in that law may not conflict with a valid restraining order, protective order or order for custody or visitation issued by a court. See BP 5021 - Noncustodial Parents.

The rights of parents/guardians of district students include, but are not limited to, the following:

1. To observe, within a reasonable period of time after making the request, the classroom(s) in which their child is enrolled or for the purpose of selecting the school in which their child will be enrolled (Education Code 51101)

Parents/guardians may observe instructional and other school activities that involve their child in accordance with Board policy and administrative regulations adopted to ensure the safety of students and staff, prevent undue interference with instruction or harassment of school staff, and provide reasonable accommodation to parents/guardians. Upon written request by a parent/guardian, the Superintendent or designee shall arrange for parental observation of a class or activity in a reasonable time frame and in accordance with Board policy and administrative regulations. (Education Code 49091.10)

(cf. 6116 - Classroom Interruptions)

2. To meet, within a reasonable time of their request, with their child's teacher(s) and the principal (Education Code 51101)
3. Under the supervision of district employees, to volunteer their time and resources for the improvement of school facilities and school programs, including, but not limited to, providing assistance in the classroom with the approval, and under the direct supervision, of the teacher (Education Code 51101)
4. To be notified on a timely basis if their child is absent from school without permission (Education Code 51101)

(cf. 5113 - Absences and Excuses)

BUSD Special Education Staff Morale Study for FCMAT

The Brentwood Unified School District is conducting an independent review of their Special Education Programs. During this review there will be many opportunities to gather input from Board Members, parents and staff. One phase of this input will be a survey of staff morale. This process will be handled in a confidential manner between the FCMAT study team and special education staff. In order to provide assistance to the district in this area we need your participation in this anonymous survey. Please complete the survey online which does not indicate and identifiable personal information. Thank you. Please complete this survey no later than November 14, 2014.

Please respond to the following factors as they relate to you and their effect on staff morale in your work assignment.

Section I: Addresses your personal perception of special education staff morale

Section II: Identifies negative factors affecting the morale of special education staff

Section III: Lists the positive factors that affect special education staff morale

***1. My job morale is high**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

***2. The collegial spirit in this department is high**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

***3. The employee morale in this department is high**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

***4. Special Education teachers/staff are valued by the district**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

BUSD Special Education Staff Morale Study for FCMAT***5. Special Education teachers/staff are valued by the community**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

***6. Special Education teachers/staff are valued by their students**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

***7. As a Special Educator I feel pride in my work**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

***8. The Special Education staff feels that they have control over everyday decisions about the programs and services**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

***9. There is a lot of enthusiasm in the special education department**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

BUSD Special Education Staff Morale Study for FCMAT

***10. The rapid changes made in legislation, regulations, technology and techniques is a positive factor for staff morale**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

***11. The school site principals are the key to good staff morale**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

***12. I feel consulted and listened to in decisions made about education**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

***13. Complaints are handled fairly without retaliation**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

The following negative factors can affect special education staff morale

***14. Increased workload due to requirements with the IEP process and paperwork**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

BUSD Special Education Staff Morale Study for FCMAT***15. Reduction in the availability of staff development**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

***16. Frequent changes in special education leadership**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

***17. Lack of clear communication of expectations**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

***18. Lack of resources**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

***19. Lack of time for planning and collaboration**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

BUSD Special Education Staff Morale Study for FCMAT***20. Increased parent demands and expectations**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

***21. Lack of parent involvement**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

***22. Lack of support from the district office**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

***23. Lack of support from school site administration**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

Positive factors that affect special education staff morale

***24. Out of school factors: community/board support**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

BUSD Special Education Staff Morale Study for FCMAT***25. Intrinsic rewards**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

***26. Recognition of accomplishment/expertise**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

***27. Competitive salary/benefits**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

***28. Supportive colleagues**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

***29. Adequate facilities, equipment, supplies**

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

BUSD Special Education Staff Morale Study for FCMAT***30. Student Achievement**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

***31. Parent support for the special education community**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

***32. Mutual respect for special educators among district colleagues and administrators**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

***33. Collaborative leadership**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

***34. Good staff morale**

- Strongly Disagree
 Disagree
 Agree
 Strongly Agree

35. Other information you would like to share:

Thank you for your participation in this survey. There will be additional opportunities for interviews with the FCMAT team to provide additional information.

Process for Requesting
Special Circumstance
Instructional Aides

Guidelines and Forms

Guidelines for Requesting Special Circumstance Instructional Assistance

Rationale: Special circumstance instructional assistance (SCIA) may be indicated in situations where additional staff support is needed in the classroom or en route to and from school due to 1) pervasive and aggressive student behaviors directed towards self or others, or 2) intensive student needs.

Factors for review and consideration:

The goal for any special needs student is to encourage, promote, and maximize independence. If not carefully monitored, special circumstance instructional assistance can easily and unintentionally foster dependence. A student's total educational program must be carefully evaluated to determine where support is indicated. Natural support and existing staff support should be used whenever possible to promote the least restrictive environment.

Special factors for students residing in the _____ :

1. All requests for SCIA shall be submitted to the Director of Special Education. SCIA should not be indicated in individual student IEP's as a service. However, in certain circumstances the need for additional support may need to be indicated in a student's IEP. In those instances, the need shall be indicated in the present levels or meeting notes as "100% supervision."
2. For services requiring additional personnel support as a result of student-related behavioral issues, a positive behavioral support plan or Behavior Intervention Plan should be developed and should include provisions describing how and when the support will be utilized to implement the plan and when the plan will be reviewed and modified, including the fading of SCI Assistance.
3. Observational assessments and team staffings will be conducted on a quarterly basis to evaluate the continued need for SCIA.

Budget coding for additional paraeducator support (classroom and/or transportation):

0100-56400-0-5750-3142-220004-XXXX-XXX
0100-65000-0-5750-1110-210004-XXXX-XXX

The appropriate code must be entered on all status forms and payroll timesheets. The Special Education Department Accountant shall receive a copy of all SCIA requests and shall be notified routinely of all excess costs.

Process for requesting SCI Assistance:

1. Complete the Request for Special Circumstance Instructional Assistance (for Classroom Support and/or Transportation Support).
2. Complete the Observational Evaluation for SCI Assistance (For Individual Student Support only).

3. Complete the Student Needs for Additional Support Rubric (For Classroom Support , Individual Student Support and Transportation Support).
4. Complete the Class Weighting Worksheet (For Classroom Support only).
5. Attach supporting documentation if pertinent (IEP, Behavior Plan, etc.).
6. Submit all paperwork to the Director of Special Education.
7. Upon approval, complete the Request for Long-term Substitute for classroom support and/or an employee status form for transportation support (regular employee ride along).
8. All forms will be disseminated to the Special Education Accountant, Human Resources Department, Program Specialist and Special Education Director.
9. The Special Education Director will assist the site during each quarter to review the need for on-going SCIA classroom and/or transportation support.

Request for Special Circumstance Instructional Aide Student-Related/Transportation Support

Please complete all required information and return to the Special Education Department, Director of Special Education. Notification of approval will be provided to the Program Manager, Special Education Accountant, Finance Department, and Human Resources Department.

Program _____ *Teacher* _____

Program Specialist _____ **Date** _____

Student _____ **DOB** _____

District of Residence _____ **Classroom** _____

Requested Start Date _____ *Anticipated Ending date* _____

Transportation Provider (check one): _____ **District of Residence** _____ **First Student**

Rationale for ride-along support: (Attach additional information/documentation)

Department Approval:

Program Specialist _____
Date

Special Education Director _____
Date

Comments:

SCIA Assignment Codes:
0100-56400-0-5750-3142-220004-XXXX-XXX
0100-65000-0-5750-1110-210004-XXXX-XXX

Enter budget code:

FUND	RESOURCE	YEAR	GOAL	FUNCTION	OBJECT	DEPT.	MANAGER

Student Needs for Additional Support Rubric

Student Name: _____ DOB: _____ Disability: _____ Date Reviewed: _____
 Teacher: _____ Current Program: _____

Select the number that best describes the student in each rubric category that is appropriate.

	Health/Personal Care/Rating	Behavior/Rating	Instruction/Rating	Inclusion/Mainstreaming/Rating
0	General good health. No specialized health care procedure, medications taken, or time for health care. Independently maintains all "age appropriate" personal care.	Follows adult directions without frequent prompts or close supervision. Handles change and redirection. Usually gets along with peers and adults. Seeks out friends.	Participates fully in whole class instruction. Stays on task during typical instruction activity. Follows direction with few to no additional prompts.	Participate in some core curriculum within general education class and requires few modifications. Can find classroom. Usually socializes well with peers.
1	Mild or occasional health concerns. Allergies or other chronic health conditions. No specialized health care procedure. Medications administration takes less than 10 minutes time. Needs reminders to complete "age appropriate" personal care activities.	Follows adult direction but occasionally requires additional encouragement and prompts. Occasional difficulty with peers or adults. Does not always seek out friends but plays if invited	Participates in groups at instructional level but may require additional prompts, cues or reinforcement. Requires reminders to stay on task, follow directions and to remain engaged in learning	Participates with modification and accommodation. Needs occasional reminders of room and schedule. Requires some additional support to finish work & be responsible. Needs some social energy to interact with peers appropriately.
2	Chronic health issues, generic specialized health care procedure. Takes medication. Health care intervention for 10-15 min daily (diet, blood sugar, medication). Requires reminders and additional prompts or limited hands on assistance for washing hands, using bathroom, wiping mouth, shoes, buttons, zippers, etc. Occasional toileting accidents.	Has problems following directions and behaving appropriately. Can be managed adequately with a classroom behavior management plan, but unable to experience much success without behavior support plan implementation.	Cannot always participate in whole class instruction. Requires smaller groups and frequent verbal prompts, cues or reinforcement. On task about 50% of the time with support. Requires more verbal prompts to follow directions.	Participates with visual supervision and occasional verbal prompts. Requires visual shadowing to get to class. Needs modifications & accommodations to benefit from class activities. Regular socialization may require adult facilitation.
3 *	Very specialized health care procedure and medication. Limited mobility. Physical limitations requiring assistance (stander, walker, gait trainer or wheelchair). Special food prep or feeding. Health related interventions 15-45 min. daily. Frequent physical prompts and direction assistance for personal care. Food prep required regularly. Requires toilet schedule, training, direct help diapering.	Serious behavior problems almost daily. Defiant and/or prone to physical aggression. Requires a Behavior Intervention Plan (BIP) and behavior goals and objectives on the IEP. Requires close visual supervision to implement BIP. Medication for ADD/ADHD or other behaviors.	Difficult to participate in a large group. Requires low student staff ratio, close adult proximity and prompts including physical assistance to stay on task. Primarily complies only with 1:1 directions & monitoring. Cognitive abilities & skills likely require modifications not typical for class as a whole. Needs Discrete Trial, ABA, Structured Teaching, PECS. Requires signing over 80% of time.	Participation may require additional staff for direct instructional and behavioral support. Requires direct supervision going to & from class. Always requires modifications & accommodations for class work. Requires adult to facilitate social interaction with peers.
4 *	Specialized health care procedure requiring care by specially trained employee (G tube, tracheotomy, catheterization.) Takes medication, requires positioning or bracing multiple times daily. Health related interventions 45 min. daily. Direct assistance with most personal care. Requires two-person lift. Direct 1:1 assistance 45 or more minutes daily.	Serious behavior problems with potential for injury to self and others, runs-away, aggressive on a daily basis. Functional Analysis of Behavior or Hughes Bill has been completed and the student has a well-developed BIP, which must be implemented to allow the student to safely attend school. Staff has been trained in the management of assaultive behaviors.	Cannot participate in a group without constant 1:1 support. Requires constant verbal and physical prompting to stay on task and follow directions. Regularly requires specific 1:1 instructional strategies to benefit from the IEP. Cognitive abilities and skills require significant accommodation and modification not typical for the class group	Always requires 1:1 staff in close proximity for direct instruction, safety, mobility or behavior monitoring. Requires 1:1 assistance to go to and from class 80% of the time. Requires adult to facilitate social interaction with peers and remain in close proximity at all times.

*Attach a copy of documentation indicating frequency and duration over a period of time to determine further consideration of special circumstance instructional assistance. If mostly ratings of 3's & 4's, in two or more areas, continue with needs assessment process.

Observational Evaluation for SCI Assistance

Student: _____ School: _____

Teacher: _____ Date: _____

Observer's Name/Title: _____ Setting: _____

Section I: Please complete the following review of the visual and physical structure of the classroom, curriculum design, data collection and planning.

Posted classroom schedule _____Yes _____No

If yes, complete section below:

1. The following elements are included in the classroom schedule:

- | | |
|--------------------------------------|-------------------------------------|
| <input type="checkbox"/> Times | <input type="checkbox"/> Locations |
| <input type="checkbox"/> Students | <input type="checkbox"/> Activities |
| <input type="checkbox"/> Staff names | |

2. The schedule is Daily Weekly Other

Individual student schedule _____Yes _____No

If yes, complete section below:

1. Student uses the following format for individualized schedule:

- | | |
|-------------------------------------|-------------------------------|
| <input type="checkbox"/> Object | <input type="checkbox"/> Icon |
| <input type="checkbox"/> Photograph | <input type="checkbox"/> Word |
| <input type="checkbox"/> Picture | |

2. Room is arranged with structure to correlate with tasks on schedule:

- | | |
|---------------------------------------------------|----------------------------------------------------|
| <input type="checkbox"/> Area for one-to-one work | <input type="checkbox"/> Area for independent work |
| <input type="checkbox"/> Area for group work | <input type="checkbox"/> Area for leisure |
| <input type="checkbox"/> Not applicable | |

3. Student ability to follow the schedule:

- | | |
|----------------------------------------------------------|----------------------------------------------------|
| <input type="checkbox"/> Independent | <input type="checkbox"/> |
| <input type="checkbox"/> Non-verbal with gestural prompt | <input type="checkbox"/> With direct verbal prompt |
| <input type="checkbox"/> With indirect verbal prompt | <input type="checkbox"/> With physical prompt |

Consistent Inconsistent

4. Student use of the schedule:

- | | |
|---------------------------------------------------------|-----------------------------------------------------------------|
| <input type="checkbox"/> Student carries schedule | <input type="checkbox"/> Student uses transition cards |
| <input type="checkbox"/> Student goes to schedule board | <input type="checkbox"/> Teacher carries and shows the schedule |

Consistent Inconsistent

**Attach sample classroom schedule and individual student schedule*

Curriculum and instructional planning

1. Check the curricular domains included in the student's program:

- Communication
- Self care

- Academics
- Motor skills/mobility

- | | |
|----------------------------------------------------|---------------------------------------------|
| <input type="checkbox"/> Domestic | <input type="checkbox"/> Recreation/leisure |
| <input type="checkbox"/> Social/behavioral | |
| <input type="checkbox"/> Pre-vocational/vocational | <input type="checkbox"/> Other: |

2. Describe curricular accommodations and/or modifications currently being used:
3. List equipment or devices used /available that may relate to the need for assistance (may be low incidence equipment or assistive technology device):

4. Are materials and activities age appropriate? Yes No

5. Are materials and activities instructionally appropriate? Yes No

Current data systems and collection of data

Has data been collected on student performance? _____Yes _____No

If yes, complete section below:

1. Current data on each objective includes:

- | | |
|-------------------------------|-------------------------------------------------------------------|
| <input type="checkbox"/> Date | <input type="checkbox"/> Level of independence (prompting needed) |
| <input type="checkbox"/> Task | |

2. Data is collected:

- | | |
|---------------------------------|-----------------------------------|
| <input type="checkbox"/> Daily | <input type="checkbox"/> Biweekly |
| <input type="checkbox"/> Weekly | <input type="checkbox"/> Monthly |

3. Data is summarized in the following manner:

- | | |
|--------------------------------------------|--------------------------------|
| <input type="checkbox"/> Graphed | <input type="checkbox"/> Other |
| <input type="checkbox"/> Written narrative | |

****Attach sample***

Behavior and safety

1. Describe the behavior management system in the classroom, including positive reinforcers and consequences. Is the system appropriate for the student or does it need modification?

2. Are specific positive behavior supports utilized for the student? Yes No
Describe:

3. Is there appropriate safety equipment in place? Yes No

4. Are appropriate safety and medical procedures being used? Yes No

5. Does it appear appropriate training has been provided? Yes No

Comments:

6. Describe the student's interactions with peers:

7. Describe the student's interaction with non-classroom staff in a less structured environment:

8. What activities does the student choose during breaks?

9. What problems are evident?

Planning team meetings

1. Are team meetings held? (formal or informal meetings to problem solve) Yes No
- If yes, complete section below:
- Daily Biweekly
- Weekly Monthly
- Need to be schedule

Meetings include the following participants:

Current utilization of assistance

How is existing assistance utilized?

- Behavior management Medical assistance
- Curriculum adaptation and preparation Supervision
- Instruction - individual
- Instruction - group
- Other

Team Summary/Action Plan

1. Can current conditions be modified to meet the student's goals and objectives and/or personal care needs? If so, how?

2. What other types of assistance are needed? Why?

3. Are there any other issues that need to be addressed?

4. Recommendations:

Techniques to Promote Independence and Fading of Support

1. Watch before assisting. Can the student ask for help from teacher or peer?
2. Can the student problem solve independently?
3. Give the student extra time to process and respond before assisting.
4. Provide consistent classroom schedule (posted, visual, at desk if needed, reinforcement periods included). Teach the student how to use it.
5. Start with the least intrusive prompts to get the student to respond:
 - A. Gestural, hand or facial signals
 - B. Timer
 - C. Verbal
 - D. Light physical
 - E. Hand over hand
6. Prompt, then back away to allow independent time.
7. Use strengths and weaknesses, likes and dislikes to motivate student participation and interest.
8. Model; guide (watch and assist); check (leave and check back).
9. Teach independence skills (raising hand, asking for help, modeling other students).
10. Praise for independent attempts.
11. Direct the student to answer to the teacher.
12. Prompt the student to listen to the teacher's instructions. Repeat only when necessary.
13. Encourage age appropriate work habits. See what other students are doing.
14. Be aware of proximity. Sit with the student only when necessary.
15. Encourage peer assistance and partnering. Teach peers how to help, not enable.
16. Utilize self-monitoring checklists for student.
17. Color code materials to assist with organization.
18. Use transition objects to help the student anticipate/complete transition (i.e., head phones for listening center).
19. Break big tasks into steps.
20. Use backward chaining (i.e., leave the last portion of a cutting task for the student, then gradually lengthen the task).
21. Assist in encouraging a means for independent communication (i.e., PECS).
22. Provide positive feedback (be specific to the situation).
23. Ask facilitative questions ("What comes next?" "What are other students doing?" "What does the schedule say?" "What did the teacher say?").
24. Give choices.

Instructional Aide Guidelines

I. GUIDING PRINCIPLES

A. Rationale

SELPA is committed to providing a full continuum of placement options for students with identified disabilities who are receiving special education services. The Individuals with Disabilities Education Act (IDEA2004) and California laws and regulations describe a continuum of alternative placements such as instruction in general education classes, special classes, special schools, home instruction and instruction in hospitals and institutions. Both federal and state laws contain provisions to ensure that children with disabilities are educated to the maximum extent possible with children who are not disabled and that children are removed from the general education environment only when the nature of the disability is such that education in the general education classroom cannot be satisfactorily achieved with the use of related services.

B. Related Services

California's related services as defined in Education Code and Title V regulations are referred to as Designated Instruction and Services or DIS. IDEA2004 defines Related Services as signifying the utilization of aids, services, and other supports that are provided in general education classes or other education-related settings to enable children with disabilities to be educated with non-disabled children to the maximum extent appropriate. This applies to any general education program or special education program in which the student may participate.

C. Special Needs Assistant/Support

By law, services to students with special needs must be delivered in the least restrictive environment (LRE). When an IEP Team is considering a special needs assistant for a student, all aspects of the student's program must be considered with the intent of maximizing the student's independence. It must be acknowledged that the teacher, rather than the assistant, is responsible for the design and implementation of the student's program. The IEP team must consider the student's personal independence when discussing the necessity for a special needs assistant. The foremost educational goal for any special needs student is to encourage, promote, and maximize independence. Without proper consideration of the role of a special needs assistant, the presence of such support may unintentionally foster dependence. The team must carefully evaluate a student's total educational program to determine where support is indicated. Natural support, existing staff support, and/or other classroom modifications/supports (e.g. assistive technology, behavior plan) should be used whenever possible to promote the least restrictive environment (LRE).

D. Other considerations

- The IEP Team needs to base the decision for a special needs assistant as a related service on appropriate documentation and assessment. A special needs assistant is considered only in instances where the student is not able to

benefit from a Free and Appropriate Public Education without such support. Specifically the program modifications or supports for school personnel (special needs assistant) are necessary to assist the student to:

- ◆ Advance appropriately toward the annual goals
 - ◆ Be involved in and progress in the general curriculum
 - ◆ Participate in extracurricular and other nonacademic activities; and,
 - ◆ Be educated and participate with other disabled and non-disabled students.
- If a special needs assistant is necessary for curricular purposes, the IEP Team must consider if the current goals and objectives are appropriate and if the proposed placement is truly the least restrictive environment for the child.
 - If a special needs assistant is necessary for behavioral concerns, the IEP Team must have charted behaviors and implemented an appropriate behavior plan before they consider a special needs assistant.
 - The school nurse should be a part of the IEP Team discussion whenever assistance is needed due to a medical need.

II. PROCEDURES/ADMINISTRATIVE GUIDELINES

A. Complete an Evaluation

Members of the school education team need to complete the Evaluation to determine the Appropriateness for a Special Needs Aide form to evaluate the need for additional classroom support.

B. Schedule IEP Meeting

If, after completing the form, it is determined that a special needs assistant (for the classroom or for a specific student) is needed, an IEP meeting should be scheduled and should include an appropriate district of residence administrator/designee.

C. The IEP needs to include the following:

1. A statement that the special needs assistant is necessary for the child to benefit from his/her educational program with a specific statement of how the related service will assist the child. Specify the conditions and circumstances under which the special needs assistant appears appropriate for the student.
2. An objective manner (criteria) for evaluating whether the addition of personnel assists the child in benefiting from his/her educational program.
3. A statement of the frequency and location of the related service(s).
4. A statement of the duration of the services. A short-term special needs assistant could be used for an evaluation period or transition period not to exceed eight weeks.
5. A statement of the role of the special needs assistant as well as the role of the teacher and any other professionals responsible for the student's education.

6. A systematic written plan to address how the additional personnel support will be monitored and to address the criteria for fading that support as the student gains independence.
7. The schedule for review of the student's program which leads to the fading of the assistant. It is recommended that the team meet at least every six months except for cases of extreme medical need.
8. Goals/objectives that address the skills needed by the child in order for the special needs assistant to be faded.
9. A behavior plan for a student requiring a special needs assistant for behavior. The behavior plan needs to include a description of how and when support, including personnel, will be utilized to implement the plan and when the plan will be reviewed and modified.
10. If the student has instructional needs requiring additional personnel, a written plan must be developed by the general and/or special education teacher(s) based on appropriate assessment information. The plan must specify how the additional personnel will be utilized to support the teacher in implementing the student's goals and objectives. Additionally, the plan must indicate what attempts will be made to transition to other available classroom resources and supports. (timeline, criteria, and specific resources and supports)

Evaluation to Determine the Appropriateness for a Special Needs Aide

Date:				
Student:			Grade:	
Teacher:		Title:		
School Site:			Room Number:	
Instructional Setting:				

When completing the form, please use the back pages of the form as necessary to give complete information.

A. Curriculum and Instructional Planning

1. Check the curricular domains included in the student's IEP:

___ Communication

___ Academic/Pre-academic

___ Self-Care

___ Behavior

___ Pre-vocational, Vocational ___ Motor skills/Mobility

___ Other (specify: _____)

2. Is the student currently making progress towards the IEP goals?

___ Yes (all)

___ Yes (some)

___ No

3. If limited or no progress is being made, what factors are responsible for this?

4. Describe all interventions attempted including the duration of the intervention and the success or lack of success for each intervention.

5. List equipment or devices used that may relate to the need for assistance.

6. Describe reinforcers and reinforcement schedule used.

7. List materials and activities being used as part of the student's instructional program.

8. Does the student have behaviors that negatively impact the learning environment for other students? (Please include all documentation of attempts to reduce the behavior including a behavior plan.)

B. Classroom Environment

1. Attach a diagram of the arrangement of the furniture and instructional areas that provide the physical structure of the classroom. Does the physical environment of the classroom present barriers to the student's participation in the curriculum? If yes, how?

1. Describe the classroom schedule and visual supports provided for the student.

2. Describe the classroom management system.

Are the visual structures in place enough to meet the student's needs? If no, what else is needed? Is the current classroom management system working for the student? If no, what else is needed?

3. Are distractions occurring in the classroom that interfere with student learning? If yes, what are they?

C. Determining Student Access to the Curriculum

1. What part(s) of the curriculum is accessible to the student given the natural or available supports?
2. What part(s) of the curriculum is not accessible given the natural or available supports?

What factors prevent the student's participation in this aspect of the curriculum?

D. Determining Available Supports

1. What supports (personnel, environmental, structural, instructional) are available for the student in the natural environment?

2. Describe other school personnel that might be available to support the student's needs? (classroom teacher, special education teacher, special education paraprofessional, other school instructional aides, peer support, etc.)

3. Describe other modifications or supports that might be considered for the student that have not been tried. (change of classroom environment, classroom management plan, individual behavior plan, assistive technology)

4. Please check any intervention below that might be helpful to try before consideration of a **special needs aide**.
 - a. ____ Training for instructional staff (specify what type)
 - b. ____ In class coaching
 - c. ____ Consultation in the classroom
 - d. ____ Behavior observation/support
 - e. ____ Other (please specify)

5. If a **special needs aide** is being contemplated, does the assistant need to be assigned to one student or could the assistant be assigned to the entire class?

6. Specify exactly what times during the day the student could participate without the support of the **special needs aide**.

Time of Day	Activity

If a **special needs aide** is contemplated for this student, what part(s) of the day would the student require support? What type of support would be given?

Time of Day	Activity	Anticipated Support

E. Determining the Need for Assistance

_____ The student is able to access the curriculum in the least restrictive environment with supports currently available in the school environment.

_____ The student is not able to access the curriculum in the least restrictive environment using natural and/or available supports for the following reason(s):

_____ Intensive medical need (attach documentation)

_____ Serious behavior (attach documentation of attempted interventions and current behavior plan)

_____ Low Incidence needs (scribe, sign language translator, notetaker, etc.)

____ Basic life function assistance

____ Other (curricular, mobility, etc.)

Specify: _____

Appendix F

What is ADR?

Alternative Dispute Resolution (ADR) is an informal method of settling disagreements that may arise during an IEP meeting.

ADR uses specific options of this process to promote understanding, open communication, and satisfying solutions to conflict that support and strengthen relationships.

ADR is designed to meet the interests of the parties involved that results in a crafted, mutually agreeable outcome, rather than living with a decision made by a third party, such as a hearing officer or judge.

Contact Contra Costa SELPA's ADR Intake Coordinator at 925-827-0949 x 24 for more information if you reside in a member district:

Acalanes
Antioch
Brentwood
Byron
Canyon
John Swett
Knightsen
Lafayette
Liberty
Martinez
Moraga
Oakley
Orinda
Pittsburg
Walnut Creek

What is ADR?

CONFIDENTIAL

All information shared through the ADR process remains confidential unless all parties agree otherwise.

NO COST

ADR does not have costs tied to its processes, unlike Due Process and are free of cost to families and local education agencies.

LEGAL PROTECTIONS

Parties choosing to engage in any Alternative Dispute Resolution practices do not give up their rights to Due Process.

SPEEDY

Most ADR options are initiated within 72 hours of contacting the Intake Coordinator.

OUTCOME-ORIENTED

The goal is to establish mutually agreeable solutions resulting in written agreements.



SPECIAL EDUCATION ALTERNATIVE DISPUTE RESOLUTION (ADR)

- ✓ Confidential
- ✓ No Cost
- ✓ Speedy
- ✓ Legal Protections
- ✓ Outcome-Oriented

Contra Costa SELPA
2520 Stanwell Drive, Suite 270
Concord CA 94520

Phone: 925.827.0949 x24
Fax: 925.825.1124

Visit our website at:
www.ccselpa.org

INFORMATION AND INTAKE

POSITION/CONTACT NUMBER	ROLE	HOW THEY CAN HELP YOU
ADR INTAKE COORDINATOR 925-827-0949 x 24	<ul style="list-style-type: none"> Listen to your concern, help you identify your interests & identify a process to help Coordinate and monitor Alternative Dispute Resolution activities 	<ul style="list-style-type: none"> Provides parents and professionals with options to address unresolved IEP issues
RESOURCE PARENTS Contact your District Special Education Office	<ul style="list-style-type: none"> Volunteers specifically trained Sanctioned by the District Willing to put aside personal issues Parent to Parent Support 	<ul style="list-style-type: none"> Assist a parent with a concern or question Support parents in the IEP process Identify interests that may suggest courses of action Serve as liaison to develop & maintain relationships between home & school Empower others to work within the educational system
SELPA PROGRAM SPECIALISTS 925-827-0949 x 10	<ul style="list-style-type: none"> Serve school districts and county offices Work with agencies, parents, schools Provide staff development Serve as a neutral party Knowledgeable about programs & services 	<ul style="list-style-type: none"> Review IEP documentation for compliance Provide parents with information on the IEP process Empower others to work within the system Meet with parents and/or LEA staff to clarify issues Serve on Solutions panel and Facilitate an IEP as a neutral party

ALTERNATIVE DISPUTE RESOLUTION COMPONENTS

COMPONENT	ROLE	HOW THEY CAN HELP YOU
TECHNICAL ASSISTANCE/ EXPERT TEAMS	<ul style="list-style-type: none"> Assist IEP teams 	<ul style="list-style-type: none"> Review assessment, determine present levels of performance, identify & prioritize desired outcomes and develop an <i>Action Plan</i>
FIRST RESPONSE TEAMS	<ul style="list-style-type: none"> Early objective file review Case analysis: risk vs. benefit Resolution Options 	<ul style="list-style-type: none"> Create a collaborative process to resolve problems Intensive support for site and district decision making Intensive support for parent decision making
FACILITATED IEPs	<ul style="list-style-type: none"> A formal IEP meeting facilitated by a neutral party and recorder 	<ul style="list-style-type: none"> Maintain the IEP process with focus and intent while honoring time limits to maintain the integrity of the IEP process Work towards resolution by the IEP team rather than a third party process
RESOLUTION SESSION	<ul style="list-style-type: none"> A mandated meeting with a neutral facilitator to manage process 	<ul style="list-style-type: none"> Specific procedures and timelines are required so work with your Special Education Administrator to include SELPA provided neutral facilitator
SOLUTION PANELS	<ul style="list-style-type: none"> A neutral panel (parent, administrator, provider) from another school district Specifically trained 	<ul style="list-style-type: none"> Uses problem solving methods to bring parties together Goal is to reach a mutually satisfying agreement
LOCAL MEDIATION	<ul style="list-style-type: none"> SELPA provided mediator Specifically Trained 	<ul style="list-style-type: none"> Promote communication between all parties, maintain a positive relationship between parties, generate options toward reaching agreement Identify alternatives and consequences if an agreement is not reached

Appendix G

Response to Intervention

There is no consistent protocol in place for Response to Intervention in the district. The California Department of Education (CDE) is coining the term Response to Intervention (RtI²) to define a general education approach of high-quality instruction and early intervention, prevention, and behavioral strategies. RtI² offers a way to eliminate the achievement gap through a school-wide process that provides assistance to every student, both high-achieving and struggling learners. It is a process that utilizes all resources in a school and school district in a collaborative manner to create a single, well-integrated system of instruction and interventions informed by student outcome data. RtI² is fully aligned with the research on the effectiveness of early intervention and the recommendations of the California P-16 Council. Access, culture and climate, expectations, and strategies are the council's themes.

On November 14, 2008, the California Department of Education issued the following information regarding RtI² as guidance to our schools in California:

Definition

Response to Instruction and Intervention (RtI²) is a systematic, data-driven approach to instruction that benefits every student. 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.

Core Components

A cohesive RtI² process integrates resources from general education, categorical programs, and special education into a comprehensive system of core instruction and interventions to benefit every student. The following core components are critical to the full implementation of a strong RtI² process:

- 1. High-quality classroom instruction.** Students receive high-quality and culturally relevant, standards-based instruction in their classroom setting by highly qualified teachers.
- 2. Research-based instruction.** The instruction that is provided within the classroom is culturally responsive and has been demonstrated to be effective through scientific research.
- 3. Universal screening.** School staff assesses all students to determine students' needs. On the basis of collected data, school staff members determine which students require

close progress monitoring, differentiated instruction, additional targeted assessment, a specific research-based intervention, or acceleration.

- 4. Continuous classroom progress monitoring.** The classroom performance of all students is monitored continually within the classroom. In this way, teachers can identify those learners who need more depth and complexity in daily work and those who are not meeting benchmarks or other expected standards and adjust instruction accordingly.
- 5. Research-based interventions.** When monitoring data indicate a student's lack of progress, an appropriate research-based intervention is implemented. The interventions are designed to increase the intensity of the students' instructional experience.
- 6. Progress monitoring during instruction and interventions.** School staff members use progress monitoring data to determine the effectiveness of the acceleration or intervention and make any modifications, as needed. Carefully defined data is collected on a frequent basis to provide a cumulative record of the students' progress, acceleration, and/or response to instruction and intervention.
- 7. Fidelity of program implementation.** Student success in the Rtl² model requires fidelity of implementation in the delivery of content and instructional strategies specific to the learning and/or behavioral needs of the student.
- 8. Staff development and collaboration.** All school staff members are trained in assessments, data analysis, programs, and research-based instructional practices and strategies. Site grade-level or interdisciplinary teams use a collaborative approach to analyze student data and work together in the development, implementation, and monitoring of the intervention process.
- 9. Parent involvement.** The active participation of parents at all stages of the process is essential to improving the educational outcomes of their students. Parents are kept informed of the progress of their students in their native language or other mode of communication, and their input is valued in making appropriate decisions.
- 10. Specific learning disability determination.** The Rtl² approach may be one component of the process for determining a specific learning disability as addressed in the IDEA of 2004 statute and regulations. As part of determining eligibility, the data from the Rtl² process may be used to ensure that a student has received research-based instruction and interventions.

RtI² is to be used in schools in the following three ways:

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

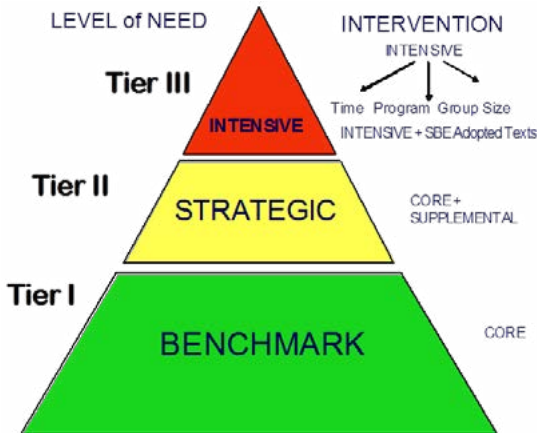


Figure 1

Tier I. Benchmark: Screening and Targeted Instruction

In Tier I, the focus is on a core instructional program that uses a scientifically validated curriculum with all students in the general education classroom. During the course of instruction, the school uses universal screening measures to identify each student's level of proficiency in key academic areas. The screening data is organized to enable the review of both group and individual performance on critical measures. Instruction is differentiated in response to this data for small groups and individual students. Students who continue to lag behind their

peers despite the provision of targeted instruction may receive additional Tier I instruction or may be considered for more intensive interventions at Tier II.

*Tier II. **Strategic:** Targeted Short-term Interventions*

In Tier II, supplemental instruction is provided to those students who exhibit a poor response to the targeted instruction provided through Tier I. Tier II intervention is provided in addition to, and not in lieu of, core instruction and can be delivered through an individualized problem-solving approach and/or a standard treatment protocol. (*Note:* Schools in Program Improvement are required to follow California State Board of Education [SBE] approved intervention regulations.) (See Figure 1.)

A problem-solving approach allows school teams to design individualized interventions to address the specific needs of each student. A standard treatment protocol uses a set of research-based practices to provide interventions in a systematic manner with all participating students who have similar needs. Such interventions are generally highly structured and have a high probability of producing positive results for large numbers of students.

Tier II supplemental interventions may be discontinued for students who improve in critical academic/behavioral measures as a result of the intervention. Some students may exhibit progress but continue to need Tier II supplemental supports. Those students who fail to display meaningful progress in spite of supplemental supports are considered for more intensive interventions in Tier III.

*Tier III. **Intensive:** Interventions with Increased Intensity*

In Tier III, students receive a greater degree of intensive interventions. Modifications in frequency, duration, or teacher-student ratio or all three are strategies to increase intensity. SBE-approved intervention programs based on research may serve as the core curriculum for students in this intensive level of intervention at fourth grade and above. As in Tier II, interventions are provided flexibly depending on the school site resources and careful blending of all interventions.

Throughout the implementation process of RtI², it will be important for the district to ensure that each staff member understands the definition of systematic change and is able to identify each member's role in the RtI implementation process. In September of 2009, the California Department of Education issued a document titled Determining Specific Learning disability Eligibility Using Response To Intervention and Instruction RtI² which provides guidance to LEAs using RtI² and describes the collaboration process among all staff members. This document outlined the components of organizational change and defines each staff member's role and responsibilities at the district level and school site level as follows:

Components of Organizational Change

An RtI² approach, with its focus on student outcomes and quality instruction, increases accountability for all learners. Systemic change at the district, site, and classroom levels that impacts instruction, intervention, and identification is necessary due to the focus of RtI² on

prevention that begins in the general education classroom. A system implementing RtI² promotes collaboration and shared responsibility for the learning of all students across all personnel and programs located in a given school (general education, teachers of English language learners, Title 1, special educators/related services providers, administrators, and parents).

Changing a school involves changes at the district level and the school site level. There are unique aspects of an RtI model at the secondary level that will require careful planning and articulation.

District Leadership

Administrative support should accompany the implementation of an RtI² approach. This support and commitment should be articulated to the staff along with financial resources necessary to provide:

- Training
- Data collection tools
- Materials
- Time for collaboration

Administrators should build awareness and understanding of the RtI² process in their schools as well as ensure training that defines the RtI² process, best practices for implementation, and the change in school culture necessary for success. Staff will understand how RtI² relates to the mandates of No Child Left Behind (NCLB) and the Individuals with Disabilities Education Act 2004 (IDEA).

Administrators should ensure frequent progress monitoring of student learning and behavior, which is central to a well-designed RtI² process. Thus, it is essential to have a cost-effective and efficient data collection procedure that everyone can understand, access, and effectively use.

Administrators responsible for curriculum at the district level are ideally suited to work with staff members on the selection of research-based materials that need to be in place across all instructional programs. The California Department of Education (CDE) has a list of, scientific, research-based curricula adopted by the California State Board of Education (SBE) in the area of reading. Districts are mandated to use one or some of these published materials in their general education classrooms. Most, if not all, of these published reading programs have supplemental materials that may be used with students who are in need of additional support.

The district superintendent and school site administrators should provide guidance, adequate time, and support necessary to allow for ongoing collaborative teaming. This may involve a review of the caseload responsibilities for counselors, reading specialists, speech-language pathologists, psychologists, special educators, and paraeducators to accommodate their changing roles from individual instruction and evaluation to additional professional roles in

collaboration, consultation, and modeling. Teams of educators and support staff (within and across grade levels) are responsible for reviewing student progress data and making recommendations for instructional practice.

School Site Leadership

The following core concepts of the RtI² approach should be in place at the school site level in order for implementation to be successful:

- Implement scientific, research-based instruction and intervention.
- Conduct ongoing monitoring of progress that increases in frequency as students demonstrate greater educational need.
- Utilize data derived from multiple sources, including curriculum-based assessment, to inform instruction and intervention.
- Conduct staff development concerning the implementation of RtI².
- Provide information to parents about the RtI² process.

School site administrators provide leadership in all levels of the RtI² process. They:

- Participate in and provide leadership to school site level teams within and across grade levels.
- Provide for the analysis of school-wide and grade-level trends.
- Support the RtI² approach in the school community and with parents.
- Provide support for assessment and instruction at all levels of intervention.
- Ensure the fidelity of instructional delivery through monitoring.

School site leadership teams:

- Examine school-wide trends in behavior and academics that impact student growth.
- Develop a combined targeted intervention and problem-solving/decision-making process to address individual student needs.
- Support ongoing professional development.
- Provide a collaborative systemic approach for the analysis and use of student data.
- Provide a collaborative systemic approach to using scientific, research-based interventions found to be effective with students in the school.

Classroom teachers and support personnel will be part of department teams that analyze:

- Progress-monitoring data to adjust instruction
- Instructional targets in the instructional planning process
- Data from shared assessments

- The fidelity of instructional implementation
- Individual student instructional needs, such as the need for more intensive instruction

All members of the school staff come together in an instructional delivery approach that uses data-based decision making through a problem-solving process involving school professionals and parents. This process involves supports for struggling students in the general education classroom first and careful analysis and communication of the data by the school site teams (within and across departments). Those teams will use data to make decisions about the application of interventions, including their intensity and duration across multiple tiers of intervention. All decisions are driven by data, including decisions such as effective instructional techniques, behavioral supports, appropriate early intervention services, use of research-based strategies, movement between tiers, and when to refer a student for additional assessment.

New and Expanding Roles

School personnel will play a number of important roles in using RtI² to provide needed instruction to struggling students as well as assist in identifying students with learning disabilities. These new and expanding roles will require some fundamental changes in the way all educators engage in assessment and intervention activities. Titles may remain the same, but some roles will change in this unified system. Emerging roles may include data managers, team leaders, data specialists, diagnosticians, and intervention specialists.

Administrators

It is essential to recognize the importance of leadership in effectively implementing the system changes that an RtI² process requires. Administrators will have a critical role in the planning, implementation, and successful use of the RtI² process. School site administrators will need to determine the necessary roles and competencies, existing skill levels, and professional development requirements at their sites in order to provide relevant and ongoing training activities and effectively implement RtI².

Additionally, administrators will have to conduct a systematic assessment of the fidelity and integrity with which instruction and interventions are being provided. Working with educators, administrators will develop and utilize protocols for the assessment of fidelity and integrity of instruction and programs for individual students. Administrators will take responsibility for supporting ongoing professional development. The school site administrator assumes an active leadership role on the school site teams that review individual student progress and determine effective interventions. The administrator will ensure that adequate time is allocated for the planning, implementation, and review of the RtI² process.

At the district level, superintendents and school boards should be supportive of the changes necessary to implement an RtI² process. Effective RtI² implementation will require financial and

human resources that will support the professional development and staffing necessary for successful implementation.

Curriculum administrators at the district level can assist with the selection of scientific research-based instructional and intervention materials; develop district-level training for principals, educators, and support providers; and ensure the fidelity and integrity of instruction in the classroom.

General Education Teachers

Successful implementation of RtI² depends on a unified approach to instruction that is supported by everyone in the school. (As schools and districts create and implement RtI² processes, general education teachers will be involved in supporting the learning of all students.) A key focus of support emphasizes prevention through early intervention. RtI² increases opportunities for teacher collaboration with other members of the educational team and brings timely and relevant supports into classrooms.

General education teachers will work in site-level teams (within and across grade levels) to identify specific student needs using data to make informed decisions that guide instruction for each student. Those teams will use data in an ongoing process for strategic student intervention groupings. Academic and/or behavioral data, collected by grade-level teams, is analyzed throughout the RtI² process to measure a pattern of response to high-quality interventions.

Special Education Teachers

Special education teachers have unique skills that can be used to enhance the learning of all students. With an RtI² approach, special educators will have increased opportunities to work with colleagues and students in many different settings. Special education teachers will work as members of site-level teams (within and across grade levels) to identify specific student needs by using data to make informed decisions that guide instruction for each student. Special education teachers will use their specialized knowledge to individualize instruction, build skills, and recommend programs that will meet the needs of individual students.

The student's progression through interventions may suggest the need for more individualized instruction, behavioral intervention, and/or learning supports than are available in the general education curriculum/setting. Special education teachers will be part of a comprehensive evaluation team that gathers student data in order to determine eligibility for special education. Special education teachers working with students identified as having a learning disability and needing special education services will engage in ongoing assessment of those students in order to adjust instruction accordingly.

Speech-Language Pathologists

Speech-language pathologists (SLPs) can play a number of roles in an RtI² process and provide needed supports to students in both general education and special education settings. The roles will require some fundamental changes in the way that SLPs engage in assessment and intervention activities. SLPs should expand their practice to incorporate prevention and identification of at-risk students who could benefit from speech and language-based interventions as part of the RtI² process at the school.

SLPs have expertise specifically in normal, delayed, and disordered development of speech and language skills, which are key to academic and behavioral difficulties. RtI² is specifically intended to assist students with academic challenges in literacy as well as behavioral difficulties. The SLP's knowledge of literacy and language-based issues can provide needed and necessary assistance to struggling learners who require intervention but may not be disabled. In an RtI² model, SLPs will provide both direct and indirect services to the school team and to students with those types of challenges.

By working both inside and outside the special education system, SLPs can contribute to the overall school program. Some SLPs are using the RtI² process to provide speech-only interventions to students with single-sound articulation difficulties and to provide specific interventions to students in need of such services. More specifically, the SLP's expertise will be most beneficial to schools and students in the areas of oral language development, academic literacy, and social skills training.

SLPs are qualified to contribute in a variety of ways in pre-referral interventions, system-wide program design, assessment, intervention, collaboration with colleagues, and directed support of students. They offer expertise in the language basis of literacy and learning, experience with collaborative approaches to instruction/intervention, and an understanding of the use of student outcomes data when instructional decisions are made.

School Psychologists

School psychologists can offer expertise at many levels, from system-wide program design through specific assessment and intervention efforts with individual students.

School psychologists help develop, implement, and evaluate new models of service delivery. School psychologists will support the implementation of evidence-based intervention strategies, progress-monitoring methods, problem-solving models, evaluation of instructional and program outcomes, and ecological assessment procedures, directly and indirectly. Their training in assessment is useful to the implementation of technically sound screening and progress-monitoring procedures and the appropriate use of such data. School psychologists also have knowledge regarding program evaluation and understanding of research methods, which will be useful in the development, implementation, and evaluation of evidence-based interventions. Their knowledge of child development, behavior, and principles of learning, coupled with their consultation skills, enables them to be effective members of intervention teams.

In addition to working with other school personnel to consider programmatic options, they plan and conduct comprehensive evaluations to determine eligibility for special education services and the educational needs of the students they serve.

School Counselors

School counselors bring several important skills to the RtI² process. They have a unique central position in the school in that they are involved with the whole school experience/environment. They are aware of the totality of programs and interventions in their school and have ongoing relationships with all the teachers, students, and parents on their caseloads.

The school counselor has skills in communication/consultation that are critical to an effective RtI² process. They can act as catalysts to facilitate the RtI² process. School counselors' skills in collaboration, problem solving, and consultation will be needed to maintain focus on student needs and the development of effective interventions.

The school counselor's knowledge of child development and the field's emphasis on working with the whole child will be invaluable in developing research-based interventions in the area of social-emotional learning.

Paraeducators

Paraeducators play an important role in the delivery of interventions to students. As one of the providers of research-based interventions, paraeducators assist general and special educators in providing supplemental and specialized instruction to students. With direction and support from the school-wide team effort, paraeducators work with students in small groups and, in some cases, one-on-one to provide research-based interventions and individualized instruction. They collaborate with other school personnel, such as general education teachers, in data collection and analysis. They perform classroom observations in order to provide relevant information regarding student performance and behavior. Paraeducators participate on school site teams that analyze academic and behavioral data and make decisions. Progress monitoring will measure patterns of response to interventions resulting in positive student outcomes.

Parents and Caregivers

Parent engagement is a key component of a strong RtI² process. Active involvement of parents contributes greatly to improving student outcomes. Parents should be engaged in all aspects of RtI². Schools need to inform parents in their native language and/or mode of communication of the RtI² process and ensure that they understand how data will be gathered and used. Parents should be encouraged to actively participate in the RtI² process and regularly informed of how their child is responding to interventions. Parents should also have an opportunity to make suggestions and receive access to written intervention plans with details about how the school is helping their student.

Professional Development

Effective implementation of an RtI² process requires that professional development needs are examined so that administrators, teachers, support personnel, and paraeducators possess the requisite skills to implement effective RtI². Successful implementation of RtI² depends on the ability of all educators, including paraprofessionals and other specialists, to use RtI² practices reliably and with fidelity. The reliability and validity with which RtI² practices are implemented will be determined, to a great extent, by the quality of both the pre-service and in-service professional development models used to translate research into effective practice. In-service professional development needs to occur both within and across administrative structures at the state, district, and site levels.

In a tiered intervention model, teachers should implement a wide variety of instructional strategies and conduct ongoing assessment of student progress as a part of their instructional practice. When an effective RtI² program is implemented, professional development decisions should be linked to ongoing assessment and student need. Subsequent professional development should be geared toward meeting these identified needs. Teachers will be challenged to examine current practices, hone existing skills, and acquire new knowledge and skills to ensure high-quality targeted instruction. An emphasis on early intervention for preventing school failure is part of an RtI² approach.

It is vital to offer continuing, job-embedded professional development that addresses relevant areas essential to effective implementation of RtI² and improved student outcomes. Teachers should have opportunities to participate in focused, quality, ongoing professional development relating to RtI² processes, procedures, and practices. Based upon identified need, key training issues should include:

- The effective use of screening tools to identify those students who may be at risk of learning difficulties
- Data analysis skills related to screening and placement
- Targeted instructional strategies related to data analysis
- Research-based instructional practices
- Differentiated instruction for a diverse classroom
- Ongoing curriculum-based data collection and analysis
- Evidence-based intervention strategies for both academic and behavior issues
- Progress-monitoring processes and procedures
- Problem-solving methods to facilitate instructional decisions based on data
- Professional collaboration skills
- Appropriate use of accommodations for students with disabilities
- School-wide and individual behavior management and intervention strategies
- Intensive intervention program training
- Standards-based Individualized Education Program (IEP) implementation
- Effective inclusion of students with disabilities in a tiered intervention model

All teachers and specialists involved in providing instruction to students should have the opportunity to participate in ongoing, job-embedded professional development that will support effective research-based instruction with the RtI² approach. The California Legislature has created funding for teachers and instructional aides or paraprofessionals teaching math and reading or directly assisting with instruction in math or reading to receive intensive training on the use of the SBE-approved core curriculum (*EC 99230 et seq.*). Special education teachers and paraprofessionals who provide instructional support to students in the core curriculum should also be included in this training along with their general education colleagues. All educators should be trained in the district-adopted intervention program in order to effectively meet the needs of students in the tiered intervention model.

Conclusion

Effective RtI² implementation is based on the belief that everyone is responsible for student learning. The instructional activities, assessment, data gathering and analysis, documentation, and collaboration required for RtI² implementation will create new challenges for all education professionals. All educators will need to compile relevant assessment data through continuous progress monitoring and respond appropriately to the findings. School site teams will design, interpret, and assess data as well as suggest instructional approaches. By providing more intensive interventions, educators will utilize a variety of scientific, research-based methods and materials. Administrators will determine needed roles and competencies, existing skill levels, and professional development requirements in order to provide relevant and ongoing training activities in these critical areas.



CSIS California School Information Services

**FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
September 12, 2014**

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

1. BASIS OF AGREEMENT

The team provides a variety of services to school districts and county offices of education upon request. The district has requested that the team assign professionals to study specific aspects of the district's operations. These professionals may include staff of the team, county offices of education, the California State Department of Education, school districts, or private contractors. All work shall be performed in accordance with the terms and conditions of this agreement.

In keeping with the provisions of Assembly Bill 1200, the county superintendent will be notified of this agreement between the district and FCMAT and will receive a copy of the final report. The final report will also be published on the FCMAT website.

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

Parent Involvement and Communication:

1. Analyze parent input regarding the opportunities for parent involvement, district outreach and parent communication that currently exist and make recommendations for improvement.
2. Recommend effective communication and problem solving models to build solid trusting relationships with *parents*, school staff, the special education department and the district office.

Program and Services:

3. Analyze current special education program and services and determine if a full range of services are provided consistent with state and federal guidelines.
4. Compare and analyze the roles, responsibilities and organizational structure of the district office staff such as the Director of Special Education, Program Specialists, Behavior Specialists, support staff and the school site administration and make recommendations for greater efficiencies and effectiveness, if needed.
5. Evaluate the effectiveness of the assignment process for teachers and aides with recommendations for improvement, if needed.
6. Provide an analysis of staffing caseloads and ratios for all special education certificated and classified staff positions using the requirements for mandated services and statewide guidelines.
7. Review policies and practices related to 1-to-1 instructional aides including identification of need, fading, staffing, classroom support ratios, monitoring and tracking of resources, and make recommendations to improve efficiency and effective use of aides.
8. Review the professional development and training provided to all staff including but not limited to administration, certificated and classified staff at the district office and school sites and make recommendations, if needed.

Compliance:

9. Recommend a communication system within the district regarding special education litigation issues and outlines the components of an effective resolution process which may reduce the threat of retaliation and reduces litigation and complaints.
10. Review compliance of state and federal regulations and the costs of due process, including settlement costs, parent attorney fees and district attorney fees and make recommendations for efficient alternatives.

Response to Intervention:

11. Provide feedback regarding the extent to which a Response to Intervention Model (RTI) is being implemented.
12. Provide an analysis for the identification process of students for special education, and assess the identification rates.

Fiscal:

13. Review the ERMHS and LCI revenue and billing and make recommendations.
14. Examine the costs of nonpublic school placements and the use of nonpublic agencies and make recommendations for greater efficiency, if needed.
15. Examine the use of Medi-Cal billing and the revenues and make recommendations.
16. Analyze the district's contribution to the general fund and make recommendations for greater efficiencies.

B. Services and Products to be Provided

1. Orientation Meeting - The team will conduct an orientation session at the district to brief district management and supervisory personnel on the team's procedures and the purpose and schedule of the study.
2. On-site Review - The team will conduct an on-site review at the district office and at school sites if necessary.
3. Exit Report - The team will hold an exit meeting at the conclusion of the on-site review to inform the district of significant findings and recommendations to that point.
4. Exit Letter – Approximately 10 days after the exit meeting, the team will issue an exit letter briefly summarizing significant findings and recommendations to date and memorializing the topics discussed in the exit meeting.
5. Draft Reports - Electronic copies of a preliminary draft report will be delivered to the district's administration for review and comment.
6. Final Report - Electronic copies of the final report will be delivered to the district's administration and to the county superintendent following completion of the review. Printed copies are available from FCMAT upon request.
7. Follow-Up Support – If requested, FCMAT will return to the district at no cost six months after completion of the study to assess the district's progress in implementing the recommendations included in the report. Progress in implementing the recommendations will be documented to the district in a FCMAT management letter.

3. PROJECT PERSONNEL

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

- | | |
|------------------------------------|--------------------------------------------|
| <i>A. William Gillaspie, Ed.D.</i> | <i>FCMAT Deputy Administrative Officer</i> |
| <i>B. Keith Butler</i> | <i>FCMAT Consultant</i> |
| <i>C. Donald Dennison</i> | <i>FCMAT Consultant</i> |
| <i>D. Mariam Galvarin, Ed.D.</i> | <i>FCMAT Consultant</i> |
| <i>E. Jackie Kirk-Martinez</i> | <i>FCMAT Consultant</i> |

Other equally qualified staff or consultants will be substituted in the event one of the above individuals is unable to participate in the study.

4. PROJECT COSTS

The cost for studies requested pursuant to E.C. 42127.8(d)(1) shall be as follows:

- A. \$500 per day for each staff member while on site, conducting fieldwork at other locations, preparing and presenting reports, or participating in meetings. The cost of independent FCMAT consultants will be billed at their actual daily rate.
- B. All out-of-pocket expenses, including travel, meals and lodging.
- C. The district will be invoiced at actual costs, with 50% of the estimated cost due following the completion of the on-site review and the remaining amount due upon the district's acceptance of the final report.

Based on the elements noted in section 2 A, the total estimated cost of the study will be \$29,300.

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

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

5. RESPONSIBILITIES OF THE DISTRICT

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

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

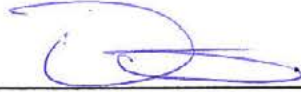
6. PROJECT SCHEDULE

The following schedule outlines the planned completion dates for different phases of the study:

Orientations:	September 23, 2014; November 4, 2014
Staff Interviews:	September 23-26, 2014; November 4-7, 2014
Exit Meeting:	November 7, 2014
Preliminary Report Submitted:	to be determined
Final Report Submitted:	to be determined
Board Presentation:	to be determined, if requested
Follow-Up Support:	if requested

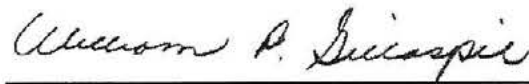
7. CONTACT PERSON

Name: Gayle Crockett, Administrative Assistant to the Superintendent
Telephone: (925) 513-6349
Fax: (925) 634-4657
E-mail: gcrockett@brentwood.k12.ca.us



Dana Eaton, Superintendent
Brentwood School District

9/17/14
Date



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

September 12, 2014

Date