

CSIS California School Information Services

Corona-Norco Unified School District

Special Education Review

June 14, 2018



Michael H. Fine
Chief Executive Officer







CSIS California School Information Services

June 14, 2018

Michael H. Lin, Ed.D., Superintendent
Corona-Norco Unified School District
2820 Clark Ave.
Norco, CA 92860

Dear Superintendent Lin:

In August 2017, the Corona-Norco Unified School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for a study to perform the following:

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

FCMAT

Michael H. Fine, Chief Executive Officer

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7. Review COE, NPS and NPA costs and placements and make recommendations for improving the process for placement and cost efficiencies, if any.
8. Review the organizational structure and staffing of the special education department in the district's central office to determine whether administration, clerical and administrative support, program specialists, teachers on special assignments and overall functionality are aligned with those of districts of comparable size and structure and make recommendations for greater efficiencies, if needed.
9. Review the special education transportation delivery system for efficiency and effectiveness, and provide recommendations for potential cost savings measures, if any. The review will include but not be limited to the role of the IEP, routing, scheduling, operations and staffing.
10. Review the costs of due process, mediations, and settlements for the past three years and make recommendations for improvements, if any.
11. Review the district's unrestricted general fund contribution to special education and make recommendations for greater efficiency, if any.

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

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

Sincerely,

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

Michael H. Fine
Chief Executive Officer

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About FCMAT

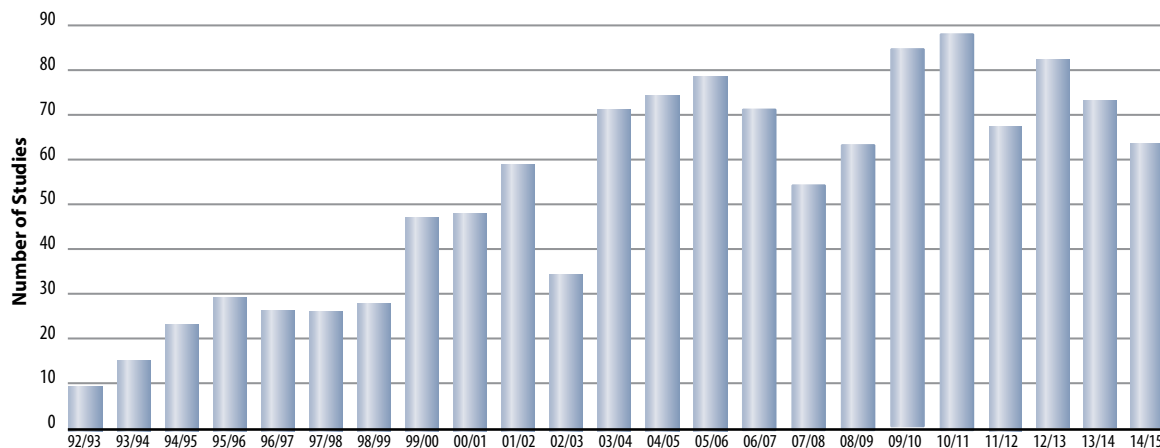
FCMAT's primary mission is to assist California's local K-14 educational agencies to identify, prevent, and resolve financial, human resources and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related school business and data services. FCMAT's fiscal and management assistance services are used not just to help avert fiscal crisis, but to promote sound financial practices, support the training and development of chief business officials and help to create efficient organizational operations. FCMAT's data management services are used to help local educational agencies (LEAs) meet state reporting responsibilities, improve data quality, and inform instructional program decisions.

FCMAT may be requested to provide fiscal crisis or management assistance by a school district, charter school, community college, county office of education, the state Superintendent of Public Instruction, or the Legislature.

When a request or assignment is received, FCMAT assembles a study team that works closely with the LEA to define the scope of work, conduct on-site fieldwork and provide a written report with findings and recommendations to help resolve issues, overcome challenges and plan for the future.

FCMAT has continued to make adjustments in the types of support provided based on the changing dynamics of K-14 LEAs and the implementation of major educational reforms.

Studies by Fiscal Year



FCMAT also develops and provides numerous publications, software tools, workshops and professional development opportunities to help LEAs operate more effectively and fulfill their fiscal oversight and data management responsibilities. The California School Information Services (CSIS) division of FCMAT assists the California Department of Education with the implementation of the California Longitudinal Pupil Achievement Data System (CALPADS). CSIS also hosts and maintains the Ed-Data website (www.ed-data.org) and provides technical expertise to the Ed-Data partnership: the California Department of Education, EdSource and FCMAT.

FCMAT was created by Assembly Bill (AB) 1200 in 1992 to assist LEAs to meet and sustain their financial obligations. AB 107 in 1997 charged FCMAT with responsibility for CSIS and its state-wide data management work. AB 1115 in 1999 codified CSIS' mission.

AB 1200 is also a statewide plan for county offices of education and school districts to work together locally to improve fiscal procedures and accountability standards. AB 2756 (2004) provides specific responsibilities to FCMAT with regard to districts that have received emergency state loans.

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

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

Introduction

Background

With a student enrollment of 53,157 in 2016-17 according to Ed-Data and an estimated enrollment of 54,052 for 2017-18, the Corona-Norco Unified School District is the largest school district in Riverside County and the 10th largest district in California. The district consists of 31 elementary schools, eight intermediate schools, five comprehensive high schools, a middle-college high school and two alternative schools. Corona-Norco Unified encompasses approximately 147 square miles in the cities and communities of Corona, Norco and Eastvale. As a single-district special education local plan area (SELPA), the district provides a full range of services to approximately 6,485 students with disabilities.

In August 2017, the district and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for FCMAT to review the district's special education programs and services.

Study and Report Guidelines

FCMAT visited the district on October 23-27, 2017 to conduct interviews, collect data, and begin reviewing documents. This report is the result of those activities and is divided into the following sections:

- Executive Summary
- Fiscal Considerations
- General Education Academic Support (SST/RtI²/MTSS)
- Identification Rate
- Continuum of Services and the Least Restrictive Environment
- Special Education Staffing and Caseloads
- Instructional Aide and Paraeducator Staffing
- Related Service Provider Staffing and Caseloads
- Nonpublic Schools and Agencies
- Due Process, Mediation and Settlements
- Organizational Structure
- Special Education Transportation
- Appendices

FCMAT's reports focus on systems and processes that may need improvement. Those that may be functioning well are generally not commented on in FCMAT's reports. In writing its reports, FCMAT uses the Associated Press Stylebook, a comprehensive guide to usage and accepted style that emphasizes conciseness and clarity. In addition, this guide emphasizes plain language, discourages the use of jargon and capitalizes relatively few terms.

Study Team

The study team was composed of the following members:

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*As members of this study team, these individuals were not representing their respective employers but were working solely as independent contractors for FCMAT. Each team member reviewed the draft report to confirm its accuracy and to achieve consensus on the final recommendations.

Executive Summary

School districts throughout the state face a continuing challenge in funding special education as the difference between federal and state funding provided and the costs for essential services continues to increase. The Corona-Norco Unified School District's unrestricted general fund contribution to special education was 44.9% of total special education expenditures in 2014-15, 48.9% in 2015-16 and 49.7% in 2016-17. Although the district's contribution is below the statewide average, the 41% increase in the total unrestricted general fund contribution over the last two years alone is significant.

Most special education students come from the general education setting. Identification of special-needs students is influenced by a district's implementation of general education supports such as student study teams (SSTs), Response to Instruction and Intervention (RtI²), and a Multi-Tiered System of Supports (MTSS). Although there is some evidence of intervention support, the district is not implementing a systemic approach to support RtI². Implementing a comprehensive RtI² system can ensure all students are supported by defining a process of rigorous instruction, universal screening, timely interventions that are consistently implemented, progress monitoring and targeted interventions for students who are not progressing commensurate with their peers.

The district has been slightly declining in enrollment with the exception of this year. The special education identification of students with individualized education programs (IEPs) is steadily increasing. The statewide identification average is 10.7%, and the district rate is 12% and rising. Compared to the state average, the district overidentifies 1.3%, or approximately 703 students. Using the 2016-17 special education end-of-year costs at \$19,617 per student, total overidentification costs are \$13,790,751 per year.

FCMAT compared the district percentage of special education students to the county and statewide average percent by disability. This comparison found that the district is over the county and state averages in the percentages of students who are intellectually disabled (ID), speech or language impaired (SLI) and orthopedically impaired (OI). Corona-Norco Unified contracts some services in SLI and all services in OI. Having the vendor who provides the services also perform the assessment related to services could result in a conflict of interest.

FCMAT reviewed the programs and range of service options available to the district's special education students and found the district provides an array of service delivery options; however, it lacks preschool integration opportunities. The district is in year one of developing a learning center approach at a couple of school sites, but it does not have guidelines or a plan to do so. There are no policies or procedures to include students with IEPs in the general education classroom although inclusive services is listed as a continuum of services option. Although the district offers many options for students, it often agrees to parent preference over staff professional recommendations for placement and services.

FCMAT requested documents to determine special education staffing, full-time staff equivalency, and the number of students served. The documents were provided in various forms, but staffing assignments, staffing full-time equivalent (FTE), and student caseload numbers were inconsistent. The study team made a thorough effort to resolve inconsistencies using the available data, but absolute accuracy in establishing total caseloads by type of service provider or grade level was not possible. It would benefit the district to have the Special Education, Business Services and Human Resources departments rigorously analyze teacher staffing and student caseload data and routinely review and update this information to ensure accuracy.

A search of documents with position control data found a minimum of 23 different job titles and position control numbers for paraeducators. Management reports that the district is undergoing a paraeducator classification review to consolidate and revise the job titles and descriptions for these positions. The processes used to track and review paraeducator staffing is inconsistent and lacks accuracy. Although paper requests for additional paraeducator support are initiated, the district has inconsistent procedures to determine if any existing staff can be reassigned to fill the requested need. The special circumstance individual assistance guidelines have recently been revised to include 1-to-1 paraeducator support, although these new guidelines had not been released to staff at the time of FCMAT's visit. Fully implementing the revised guidelines will help determine when individual support is required to meet a student's special needs. Once the IEP process determines that a student requires 1-to-1 assistance, it is important to include in the IEP a fade plan or goals for reaching independence from this service, and review and revise the plan annually as needed.

The district either provides or contracts for all related services required by state and federal regulations, including state special schools and nonpublic schools. Caseloads for school psychologists are over industry standards while those for speech and language pathologists (SLPs) appear to be under Education Code maximums (these caseloads must be considered estimates based on the lack of reliable staffing data related to special education). The district lacks an elementary SLP-specific response to intervention (RtI) program for mild-articulation-only students in primary grades. Many districts in the state have developed an early intervention support that can operate independently of any other RtI initiative. The benefit of this approach is a potential reduction in the number of students identified for special education on the basis of mild speech disorders only.

Nonpublic schools and nonpublic agencies (NPSs/NPAs) are options in the continuum of services for disabled students. Staff indicate there is a gap in the process of NPS/NPA oversight. The district has a process to create a contract, but no system to monitor it. The administrative director/SELPA and the administrative director of special education share this oversight responsibility. In most single-district SELPAs, the SELPA administrator performs these tasks. There is no mechanism for ongoing discussion between the Business and Special Education departments involving NPS and NPAs.

Over the past few years, the district has contracted for some psychological services when it cannot find qualified district staff. This is the common practice in most districts, but it is unusual for districts to choose to carry contracted staff forward year to year instead of attempting to hire for those positions. The cost for psychological services through an NPA exceeds the cost to the district if it employed its own psychologists. The district relies solely on NPAs for the related service of occupational and physical therapy.

FCMAT compared the administrative structures of three like-sized districts that have similar special education enrollment and are single-district SELPAs. Although the district's administrative support positions align with comparison districts, the functionality did not. Some positions have duplicate responsibilities, and some assignments are not equitable. The administrative structure needs to be revised and streamlined to achieve greater efficiency. Corona-Norco Unified's clerical support has clearly defined assignments; however, there is no cross training on department duties. The department lacks a systematic method for managing the workflow of this large administrative office. Comparable districts have a director's secretary who, in addition to other duties, is directly responsible for office workflow.

The pupil transportation program operates using an external contract provider, First Student Transportation Services, for special education, general education and extracurricular and co-curricular activity trips. The district oversees this contractor using district-employed administrative leadership and support staff who are responsible for coordinating bus routing and scheduling. The district has established a strong business relationship with the provider spanning many years.

Approximately 6,485 special education students in the district's Special Education Information System (SEIS) have an IEP. Of these approximately 1,381, or 21%, have transportation identified as a necessary related support service in their IEP. This is a high identification rate for students receiving transportation as a necessary related service. IEP teams should be trained to appropriately assess the need for student transportation as a necessary related service using a chart known as a "decision tree" for consistency. One reason for this high rate may be the numerous district staff members involved in IEP decision-making. The district should consider consolidating the decision-makers through the IEP process for determining transportation support, or recommending that program managers or other administrators attend the IEP when a new special education student enters the district and any time a student transitions between schools (e.g. elementary to middle school and middle school to high school).

The district transportation staff struggled in coordinating transportation support for special education students during the start-up of the 2017-18 school year because accurate data for these students was not communicated in a timely manner. The district should improve its internal processes for special education student data required for transportation support through a district committee of stakeholders and district leadership to ensure that the challenges of timely and accurate data for student transportation are resolved.

There is an unusually high number of First Student contract employed bus monitors in conjunction with district-assigned bus aides or attendants assigned to bus routes. The contract with First Student does not address the placement of bus monitors, and their high usage may be the result of inconsistent oversight and review. The district should assess the high percentage of bus monitors and aides on special education routes to reduce their usage by increasing staff training in behavior support.

Bus routing efficiency is decreasing because of the insufficient routing time between the start and end times of schools. The district should consider the benefits and potential cost reduction that would result from assessing the master bell schedule, allowing the transportation staff to suggest sufficiently staggered school start/end times based on a three-tier system.

The district's transportation program responsibilities have increased over the last five years. Approximately 30 special education routes have been added. The district has also implemented student participation fees for the general education ridership. The district should increase staffing by one FTE transportation scheduler and one part-time clerical support position employed for 10 months annually to be scheduled during times of greatest need.

Findings and Recommendations

Fiscal Considerations

The special education funding structure was established by Assembly Bill (AB) 602, which was introduced and signed into law in 1997 and became effective with the 1998-99 fiscal year.

Under AB 602, special education funding is based on the average daily attendance (ADA) of all district students, regardless of the number of those served in special education programs or the cost to serve them. California distributes special education funds to SELPAs.

In addition to AB 602 state funding, districts/SELPAs receive a small amount of federal funds. These sources of funding are designed to supplement the general education program, not support a standalone program. Therefore, the combined state and federal financial resources are insufficient to cover even the most efficient special education programs. Districts make contributions from local resources generated by all students, including special education students. This contribution is the amount of funding that a district must transfer from its unrestricted general fund to pay for the portion of special education costs that exceeds program revenues.

Federal statute requires districts to spend at least the same amount of state and local funds on special education services in each succeeding year. This requirement is commonly referred to as the maintenance of effort (MOE). There are limited exceptions to the requirement, and if a district is considering reductions to its total general fund contribution to special education, it is required to follow the MOE requirements (20 U.S.C.1413 (a)(2)(A)). The California Department of Education (CDE) lists the following as exceptions that allow the district to reduce the amount of state and local funds spent on special education:

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

Source: California Department of Education, Exempt Reductions to Maintenance of Effort, www.cde.ca.gov/sp/sep/as/documents/leamoeexempwrkshst.xls

The Local Control Funding Formula (LCFF) was enacted with the passage of the 2013-14 State Budget Act and replaced the previous K-12 finance system. The formula for school districts and charter schools is composed of uniform base grants by grade spans (K-3, 4-6, 7-8, and 9-12) and includes additional funding for certain student demographic groups.

Under the previous K-12 finance system, general education ADA funding generated by special day class (SDC) attendance was transferred from the unrestricted general fund to the special education program. This ADA is no longer reported separately, and the CDE determined the transfer should no longer occur under the LCFF. Because of this, general fund contributions to special education can be higher under the LCFF, but do not necessarily indicate increased adverse impacts on the district's resources.

Special education financial reporting methods used by districts, county offices, and SELPAs can vary. For example, some districts include special education transportation costs, while others do not. It is not always possible to accurately compare a district's unrestricted general fund contribution to that of other districts, however, a district should address a contribution that is excessive or increasing. MOE documents provided to FCMAT indicate the district's unrestricted general fund contribution (including special education transportation) was \$42,972,013 or 45% of total special education expenditures in 2014-15, \$53,594,873 or 49% in 2015-16 and \$60,611,883 or 50% in 2016-17. This information is summarized in the table below.

Unrestricted General Fund Contribution

	2014-15	2015-16	2016-17
Total special education costs	\$ 95,688,129	\$ 109,620,403	\$ 121,918,009
Contribution to federal and state resources	\$ 35,460,181	\$ 44,996,720	\$ 51,271,366
Special education transportation contribution	\$ 7,511,832	\$ 8,598,153	\$ 9,340,517
Total contribution	\$ 42,972,013	\$ 53,594,873	\$ 60,611,883
Contribution percentage	44.9%	48.9%	49.7%

Source: District SEMA forms

There has been a marked increase in the contribution to special education of \$17,639,870 or 41% in the last two fiscal years alone. As the table below illustrates, between 2014-15 and 2016-17 the district's identified special education pupil count has increased by 384 pupils or 6.6%, and expenditures per identified special education pupil have increased by \$3,207 per pupil or 19.5%.

Expenditures Per Pupil

	2014-15	2015-16	2016-17
Total special education costs	\$ 95,688,129	\$ 109,620,403	\$ 121,918,009
Number of students with IEPs	5,831	6,075	6,215
Special education cost per student	\$16,410	\$18,045	\$19,617

Source: District SEMA forms and CASEMIS (2017 uncertified)

According to the March 2015 report of California's statewide task force on special education titled, "One System: Reforming Education to Serve ALL Students" (<http://www.smcoe.org/assets/files/about-smcoe/superintendents-office/statewide-special-education-task-force/Task%20Force%20Report%205.18.15.pdf>), the statewide average general fund contribution to special education is 43% of a local educational agency's (LEA's) total special education expenditures. The California Legislative Analyst's Office's "2017-18 Budget: Proposition 98 Education Analysis" dated February 9, 2017 states that as of 2014-15, "state and federal categorical funding covers about 40 percent of special education costs in California. Schools cover remaining special education costs with unrestricted funding (mostly) LCFF." This means the statewide average unrestricted general fund contribution has increased to approximately 60% for the 2014-15 year. Although this places the district's contribution below the statewide average, the rate of increase in the last two years is significant.

The data provided was inconsistent and not reconciled between departments. Some staff reported they are uncertain about the data they receive from other departments, so many keep their own tracking spreadsheets for enrollment, positions, special education services needed and budget information. The same staff expressed a strong desire for verifiable, consistent data. The Special Education, Human Resources and Business Services departments should have reliable data. This includes the number of students served, services needed and provided, and the related budget. This would start with a systemized process in the Special Education Department to include the SEIS-recorded services into the totals needed by type of service, by site, and districtwide.

Position control is essential for school district budgeting because typically 85% to 90% of a school district's costs are for personnel. A strong position control system allows control and management of the budget, reduces the risk of improper reconciliation of authorized positions, allows more accurate reporting, and provides improved information about a district's positions and vacancies.

Once the data related to total services needed is known it should be compared to authorized and filled positions in the Quintessential School Systems (QSS) financial system. Staff reported that QSS account numbers, which can be used for position control, are not reconciled to the human resources list of position control numbers that represent board-authorized positions that can be filled. This violates one of the vital components of position control because positions that are not authorized by the board can still be filled. Staff also reported that unneeded QSS account numbers are not deleted from the system, but sometimes are "hoarded" for potential needs at a future date, which again removes an important component of position control. Only board-authorized positions that are intended to be filled should have active position control numbers; otherwise, unauthorized hiring may occur. Another concern is late or duplicate entries occurring through the paper-based personnel requisition system, which can lead to potentially inaccurate data. The district is investigating the possibility of using QSS to implement an electronic personnel requisition system.

Staff reported that the Special Education Department takes an active role in personnel allocation as part of the annual site allocation process. However, in the existing process, site principals can request additional special education personnel after district administration had determined staffing. For example, in summer 2017, a budget decision was made to reduce the number of special education teachers by four FTE employees for the 2017-18 school year. After departmental and site discussions, the actual reduction was two FTEs, which would equate to approximately \$223,000 in total compensation. In addition, there is no systematic review process during the year to ensure that the site personnel allocations established at the beginning of the year

remain in effect. Staff members report minimal to no staff reduction occurs when a special education student no longer needs a service, such as a 1-to-1 aide, because of a reduction in services or the student leaving the district.

The district special education budget is developed using a rollover process with some modifications based on known changes for the upcoming year. The budget for 2017-18 was essentially the 2016-17 projected ending budget. Instead, the special education budget for 2018-19 and 2019-20 should be developed each year using the services needed by students to build staffing benchmarks, and comparing those benchmarks to the staffing situation at each site.

Recommendations

The district should:

1. Continue to monitor its unrestricted general fund contribution to special education.
2. Implement a working group to resolve data inconsistencies between the Special Education, Human Resources and Business Services departments.
3. Implement a strong position control process and consider moving position control to the Business Services Department for budgeting purposes.
 - a. Ensure that the Special Education Department performs a systematic review of data produced by SEIS to determine services needed and group those services by type of service, by site, and districtwide.
 - b. Ensure the Human Resources Department verifies approved and open position control numbers to the data contained in the QSS financial system.
 - c. Finalize the implementation of an electronic personnel requisition system.
 - d. Schedule and hold monthly meetings of the Special Education, Human Resources and Business Services departments to reconcile position control information.
4. Request that the Special Education Department perform regular reviews of special education personnel and services performed at each site. Reconcile this information with the SEIS reports of personnel and services required by IEPs.
5. Request that the Special Education Department use information from the above recommendation to check resources available before submitting requests for additional personnel or services.
6. Develop a “ground-up” special education budget for 2018-19 and 2019-20.

General Education Academic Support (SST/RTI²/MTSS)

Most special education students come from the general education setting. Identification of special needs is influenced by the district's implementation of SSTs, RTI², and an MTSS.

Student Study Team (SST)

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

Serving a student with an IEP is more costly than serving one through interventions and general education supports. Identifying a student for special education before general education interventions are considered is illegal under IDEA 2004 and not in the best interest of the student. Each school site has some form of a SST process although this differs from site to site. Some sites use "yellow folders" within the student's cumulative record to hold all information specific to SST meetings and interventions implemented although others were unaware of this procedure. Even though districtwide forms are established, their use is inconsistent since some sites have developed their own forms. The districtwide forms are also outdated and need to be revised to reflect current assessment protocols and interventions.

The school sites have complete autonomy to determine how the SST process works at their school, including who is the SST coordinator, the composition of the team members, who attends the meetings, and which forms are used. Some sites enter SST information into the "Q" student information system while others enter their information into a district software called Illuminate. Again, this is inconsistent and determined at a site level. Some sites provide a stipend for the SST coordinator, who may also be a general education teacher, while another site might not pay a teacher or may pay extra duty for a teacher on special assignment. Interviews indicate that the district funds five to eight release days per year for each site to pay substitutes so it can hold SST meetings. If more meetings are needed, the site determines that need and pays for substitutes from site funds. Because the process is inconsistent across the district, the process for referring students to an SST means that some struggling students may receive an SST meeting at one site but not at another. Some sites use parent-teacher conferences as a pre-SST meeting. If the student does not improve, they will move to a formal SST meeting. Some sites use the SST process only as the gateway to special education referrals and assessments. The district office does not track the number of SST meetings per site, interventions offered, progress of students, assessment referrals, and eligibility for special education determination. Tracking this information would assist with districtwide analysis of students and site needs, implementation of intervention needs, and accuracy of special education identification through SST referral for assessment. Staff indicated that in previous years, the district would coordinate and fund approximately two

release days per year for SST coordinators to meet and discuss topics that focused on processes, forms, determination of needs, implementation, and overall districtwide coordination. These meetings were reportedly helpful, but are no longer occurring.

Response to Instruction and Intervention (RtI²)

In 2004, the reauthorization of the Individuals with Disabilities Act (IDEA 2004) provided support for methods that include a response to scientific, researched-based interventions. The law states that these methods may be used as alternatives to the discrepancy model (the traditional process of comparing a child's intellectual ability and progress in school as the basis for special education eligibility) when identifying students with learning disabilities. IDEA 2004 also shifted researched-based interventions from special education to general education, stressing that these would no longer be limited to special education students, but would apply to all students. The law allows each state to develop its own guidelines and regulations. RtI, which the California Department of Education (CDE) now refers to as Response to Instruction and Intervention (RtI²), provides districts with a method to drive educational decisions and measure academic growth.

The CDE information further states the following:

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

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

1. Prevention:

All students are screened to determine their level of performance in relation to the 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 selected to receive more intense interventions.

3. Component of SLD determination:

The RtI² approach can be one component of the SLD determination as addressed in the IDEA 2004 statute and regulations. The data from the RtI² process may be used to demonstrate that a student has received researched-based instruction and interventions as part of the eligibility determination process. *

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

**Source: www.cde.ca.gov/sp/selsr/documents/sldeligiblyrti2.doc - Determining Specific Learning Disability Eligibility Using Response to Instruction and Intervention*

The Education Services Department would best lead implementation of RtI² with consultation from the Special Education Department. This would be crucial in the implementation process as RtI² is a general education function and acceptance should be sought from the entire staff.

Like SST, staff reported the district does not have an RtI² system implemented across the district. Site-level administration determines any implementation and the way it is administered. It is a best practice for a district to have clear, consistent districtwide expectations for and implementation of RtI². Implementing a comprehensive RtI² system can ensure all students are supported by defining a process of rigorous instruction, universal screening, timely interventions implemented consistently, progress monitoring, and targeted interventions for students who are not progressing commensurate with their peers.

Interviews confirmed the district uses little to no universal screening tools for all students. The district has site based “Pyramids of Interventions” and charts; however, when asked specifically about implementation of interventions and resources, staff indicated no districtwide interventions are implemented other than the newly implemented IReady. Some grouping was reported within grade levels at a few sites, and teachers on special assignment are used inconsistently for interventions. FCMAT could not determine through interviews or evidence that the district has implemented a set of activities and or practices associated with RtI².

District-level evidence that indicated it has implemented RtI² would include governing policies that outlined an RtI² system supported by the district superintendent, specific RtI² language in federal and state strategic plans, explicitly identified universal screening tools and interventions, and clearly defined district level implementation teams. Evidence at the site level would include staff who indicated knowledge of governing policies, school site decision trees and schedules, the use of screenings tools, and understanding and participation on site level implementation teams. Further indicators of implementation of an RtI² system would be district and site organizational charts indicating the district and site leaders responsible for the ongoing review and refinement of the RtI² process. District office and site level staff confirmed there is no RtI² system throughout the district.

Multi-Tiered System of Supports (MTSS)

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

The *Special EDge* issue states that an MTSS approach can, “be used to develop and align resources, programs, supports, and services at all organizational levels to increase positive student outcomes.” The March 2015 Report of California’s Statewide Task Force of Special Education, titled “One System: Reforming Education to Serve All Students”, states the following:

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

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

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

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

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

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

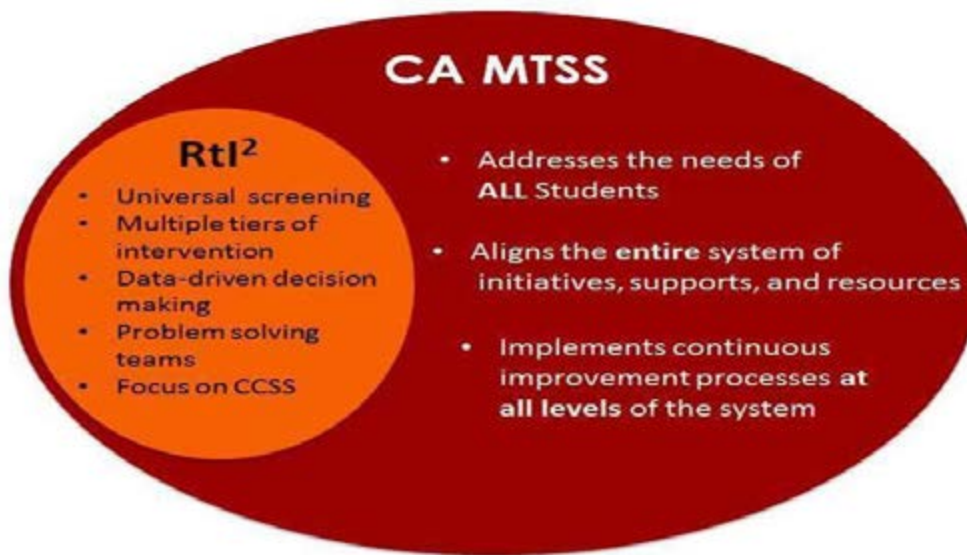
- Focusing on aligning the entire system of initiatives, supports, and resources.
- Promoting district participation in identifying and supporting systems for alignment of resources, as well as site and grade level.
- Systematically addressing support for all students, including gifted and high achievers.
- Enabling a paradigm shift for providing support and setting higher expectations for all students through intentional design and redesign of integrated services and supports, rather than selection of a few components of RtI² and intensive interventions.
- Endorsing universal design for learning instructional strategies so all students have opportunities for learning through differentiated content, processes, and product.
- Integrating instructional and intervention support so that systemic changes are sustainable and based on common core state standards (CCSS) aligned classroom instruction.
- Challenging all school staff to change the way in which they have traditionally worked across all school settings.

Source: www.cde.ca.gov/ci/cr/ri/mtsscompri2.asp

MTSS is not designed for use when making special education placement decisions, such as determining specific learning disabilities; MTSS focuses on all students in education contexts.

The following figure displays similarities and differences between California's MTSS and RtI² processes. Both rely on RtI²'s data gathering through universal screening, data-driven decision making, problem-solving teams, and a focus on the Common Core State Standards (CCSS). However, MTSS has a broader approach: it addresses the needs of all students by aligning the

entire system of initiatives, supports, and resources, and by implementing continual improvement processes at all levels.



Source: California Department of Education

For more information and documents please refer to the California Department of Education website. <http://www.cde.ca.gov/ci/cr/ri/mtsscomperti2.asp>

Both RtI² and MTSS are necessary to build a comprehensive system of interventions and supports for all students. The district should consider prioritizing RtI² and MTSS through a districtwide committee and provide intensive RtI² and MTSS training for all staff with the training phase outlined in a strategic plan.

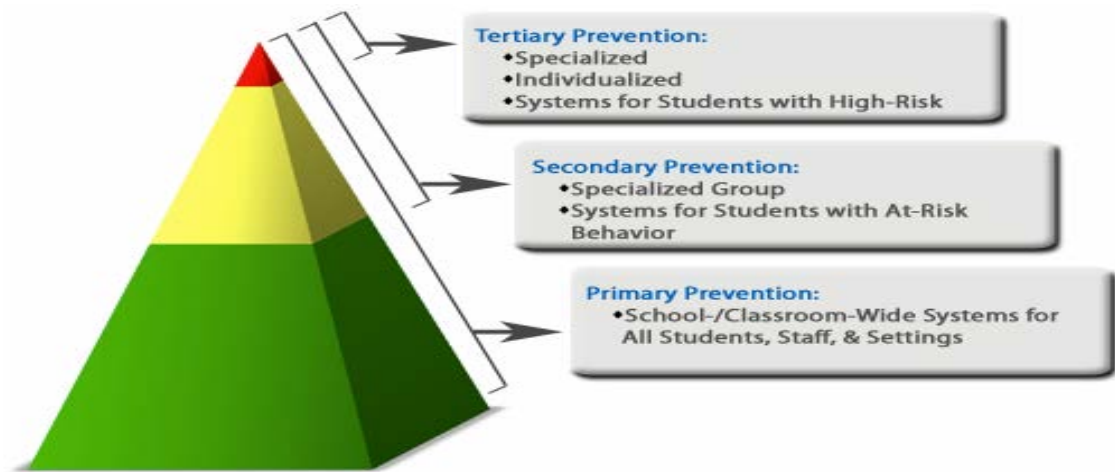
RtI² includes a behavioral component widely known as Positive Behavior Interventions and Supports (PBIS). Nothing alone removes the barriers to learning that occur when behaviors disrupt school. The climate of each school is different; therefore, a “one size fits all” approach is less effective than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

One of the foremost advances in schoolwide discipline is the emphasis on schoolwide systems of support that include strategies for defining, teaching, and supporting appropriate student behaviors to create positive school environments. Instead of using a piecemeal approach of individual behavioral management plans, a continuum of positive behavior support for all students in a school is implemented in areas including classroom and nonclassroom settings such as hallways, buses, and restrooms.

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

The following diagram illustrates the multilevel approach PBIS offers to all students:

Continuum of School-Wide Instructional & Positive Behavior Support



Source: http://www.boystowntraining.org/assets/1201-043-01_education_services_collateral_overview.pdf

Staff indicate the district has various levels of PBIS implementation, ranging from sites that are just beginning year one to sites that are in year three. They indicated they do not have the knowledge or tools to support students who exhibit problem behaviors in their classroom. Staff also report a desire for more professional development in PBIS and use of sitewide vocabulary to develop a culture to support student behaviors.

The district can evaluate both school and district readiness to implement RtI² and PBIS (or any effective intervention) with tools such as the District Capacity Assessment (DCA) available through the National Implementation Research Network (<http://implementation.fpg.unc.edu/>).

Recommendations

The district should:

1. Implement a consistent districtwide SST system with the Education Services Department leading and monitoring the processes and procedures.
2. Develop and implement an SST handbook, updating it and any SST forms at least annually.
3. Ensure site administrators utilize the SST process to provide support for struggling students.
4. Consider tracking the number of SST meetings per site, special education referrals made as a result of SST meetings and eligibility results.
5. Consider reinstating annual SST coordinator collaborative districtwide meetings.
6. Develop board policies and administrative regulations on preintervention and intervention supports.
7. Include RtI² practices in the district's strategic plan and state and federal compliance plans.

8. Develop a communication plan for all those affected outlining what RtI² is, how it will benefit all students, and how it will be implemented throughout the district.
9. Consider prioritizing RtI² and MTSS through a districtwide committee, and provide intensive RtI² and MTSS training for all staff with the training phase outlined in a strategic plan.
10. Define and implement universal screenings for all sites.
11. Define and implement a systematic RtI² and MTSS system across the district.
12. Define and implement a systematic PBIS system across the district.
13. Provide adequate and regular professional development in PBIS for all staff districtwide.

Identification Rate

The district serves students with disabilities in preschool through age 22. Staff report that many parents request assessment in hopes students will receive accommodations. This is probably compounded by the inconsistent implementation of general education interventions throughout the district. Many staff report that special education is one of the only avenues for students to receive additional support.

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

With the exception of this year, the district has been declining in total student enrollment. The special education identification of students with IEPs is steadily increasing. The statewide identification average is 10.7%, and the district's current identification rate is 12.0% and rising. Compared to the state average, as of the 2017-18 school year, the district overidentifies 1.3% or 703 students. Using the 2016-17 special education end-of year-costs of \$121,918,009, with the cost of \$19,617 per student, the total cost of this overidentification is \$13,790,751.

Identification Rate

School Year	Total Enrollment	Students with IEPs	Percentage
2014-15	53,739	5,831	10.9
2015-16	53,354	6,075	11.4
2016-17	53,157	6,215	11.7
2017 to date*	54,052	6,485	12.0

Source: DataQuest and Ed-Data, CASEMIS - All excludes infants and preschool age

*(2017 uncertified)

The table below shows the district's identification rate by disability compared to the county and state averages. The district is over the county and state averages in intellectual disability, speech or language impairment and orthopedic impairment. The district is over both county and state averages in speech and language impairment by 6.6%. The district reportedly contracts with private vendors to provide some speech services, and these vendors also provide initial and triennial assessments. Having the vendor who provides services also perform assessments related to services could result in a conflict of interest. The district should utilize district speech and language pathologists to assess students.

December 1, 2016 Identification Rates by Disability

Disability	District	County	State
Intellectual Disability	6.6	5.9	5.8
Hard of Hearing	1.4	1.6	1.3
Deaf	0.2	0.2	0.4
Speech or Language Impairment	27.8	21.2	21.2
Visual Impairment	0.3	0.4	0.4
Emotional Disturbance	1.9	2.4	3.2
Orthopedic Impairment	1.8	1.2	1.4
Other Health Impairment	12.4	12.5	12.0
Specific Learning Disability	35.3	40.9	38.8
Deaf-Blindness	0	0	0
Multiple Disability	0.7	1.3	0.9
Autism	10.8	11.4	13.2
Traumatic Brain Injury	0.2	0.2	0.2

Source: CASEMIS 12-1-2016 includes infants and preschool

Identification Rates 2014-15 through 2016-17

Disability	2014-15	2015-16	2016-17
Intellectual Disability	5.7	6.3	6.6
Hard of Hearing	1.7	1.6	1.4
Deaf	0.2	0.2	0.2
Speech or Language Impairment	27.0	27.4	27.8
Visual Impairment	0.4	0.3	0.3
Emotional Disturbance	2.0	2.0	1.9
Orthopedic Impairment	2.0	2.0	1.8
Other Health Impairment	10.0	11.2	12.4
Specific Learning Disability	39.3	37.5	35.3
Deaf-Blindness	0	0	0
Multiple Disability	0.7	0.7	0.7
Autism	10.1	10.1	10.8
Traumatic Brain Injury	0.2	0.2	0.2

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

The district has increased its identification rate in intellectual disability, speech and language impairment, other health impairment, and autism. It should prioritize its review of the root cause increase of other health impairment, which had the largest increase. According to the Special Education Annual Comparison Report, the number of students in this classification increased by 14.46% in 2014, 16.06% in 2015, and 13.84% in 2016. Students frequently identified as other health impaired (OHI) often could be supported under a 504 accommodation plan or some other support.

Recommendations

The district should:

1. Review the assessment requests and determine if general education interventions are appropriate before assessment for special education.
2. Consider tracking types of referrals, assessments and eligibility rates to assist with monitoring various annual trends.
3. Consider utilizing district-employed speech and language pathologists for initial and triennial assessments.
4. Examine the determining factors of eligibility for other health impairment, and consider other supports before special education such as health plans, 504 accommodations plans, and RtI².
5. Investigate ways to serve students before identification or to remediate, support and potentially transfer (“exit”) them from special education.

Continuum of Services and the Least Restrictive Environment

FCMAT analyzed whether the district provides a continuum of services, including whether it places students in the least restrictive environment (LRE). The IDEA establishes nationwide minimum standards for services to disabled children, 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 disabled child who needs special education and related services, regardless of whether he or she 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)). The district provides an array of service delivery options. The following is a brief description of district service options.

Preschool

The district program serves students with disabilities ages three to five years old and operates a program for students requiring only speech and language services. These students attend a program considered a walk-in clinic provided only on a school site that operates other preschool special education programs. The district does not have a process or procedure to help determine a student's "speech only," services including frequency and duration of services. Interviews indicated that a student may receive services three times per month at one site and six times per month at another.

The district also operates a preschool program four days per week for students requiring more services such as specialized academic instruction. However, some students in this program have the primary eligibility of speech and language impairment and have only speech services on their IEPs. The program description indicates it meets the needs of students who have more significant delays in expressive and/or receptive language and may have delays in social skills and/or difficulties accessing preschool curriculum. This program may be either too restrictive, or an evaluation of services requirement may need to be performed.

Five days and 16.5 hours per week, the district also operates a program for students who are more affected by learning difficulties and more severe speech delays. This program meets student needs. They receive specialized academic instruction as well as speech services.

Staff reported one to two peer role models are used in the four- and five-day programs on one to two days per week. However, these peer role models hear about the opportunity to participate by word of mouth. There are no on site general education preschool programs and only reverse integration through the use of peer models. Staff report that general education teachers, as required by IDEA, do not regularly attend preschool IEPs, and special education preschool teachers are not in attendance if a student will be recommended for a four-day per week program. This could be considered predetermination of services and placement. Staff have no guidelines when determining if a student requires a four- or a five-day per week program, and no discussions are held about least restrictive environment for students who are transitioning into transitional kindergarten or kindergarten.

Kindergarten through Secondary

The district uses common curriculum for students who are fully included in a general education program and for those who receive services from a resource specialist. Students who receive services through a self-contained special education program utilize old and out of date curri-

culum. The district purchased a teacher's guide in the teacher's grade level of choice and provided the teachers with a downloadable link to access the textbooks.

The service delivery options taken from the district provided documents are as follows:

General education with accommodations - Student is educated in the general education classroom with accommodations to the curriculum that do not fundamentally alter the content or standards. Instruction is under the direct supervision of the general education teacher. Special education staff may provide suggestions but no direct instruction.

Specialized Academic Instruction (SAI) - Under federal and state law, Special Day Class (SDC) and Resource Specialist Program (RSP) are no longer recognized as a service. SDC and RSP are under the umbrella of specialized academic instruction.

Non-Intensive School Based Program (Learning Center) – Services provided in an integrated resource program including general education and special education program options. Instructional content addresses IEP goals under direct supervision of the special education teacher with instruction provided by both special and general education teacher.

Inclusive Services – Inclusive education is part of the program continuum for students in special education. This term is often used when a severely disabled child is assigned to a general education classroom for the majority or all of his/her school day. Modifications to the general education curriculum, which fundamentally alter the content standards, are required for more than 50% of the school day. Inclusive education provides a merger of general and special education resources allowing students of diverse needs to be educated with their peers.

Resource Specialist Program (RSP) – Resource specialists provide consultation and/or collaborative services to special education students assigned to the general education classes for the majority of the day. Direct services are provided within the general education class but primarily provided in a separate classroom.

K-12 Special Day Class (SDC) – The SDC provides intensive services to students where goals cannot be met in the general education class. The district operates special day classes for both students with mild to moderate disabilities as well as moderate to severe disabilities. A student's goals drive the placement into the class for services required to make progress toward the goals.

Nonpublic School (NPS) – The NPS is a private, nonsectarian school that enrolls individuals with special needs pursuant to an IEP at district expense. The NPS is designed for students who require intensive educational instruction and therapeutic services that cannot be met in the public school.

State Special Schools – State schools for the deaf, blind and deaf-blind may be utilized for assessment and recommendations for students with these disabilities and for long-term educational placement when the public schools cannot adequately meet the student's special needs.

Home/Hospital Instruction – Provided for students with a medical prescription/letter by a physician for home/hospital services and the student is likely out of school for more than three weeks. Home/hospital for non-medical reasons when a student does not have a medical prescription/letter from a physician and the current case carrier, school psychologist, or program specialist recommends home/hospital. For medical or non-medical reasons, a maximum of five hours of instruction per week is provided.

Intensive Intervention (I.I.) Program – This program is for students who engage in emotionally unstable or inappropriate behaviors at school that repeatedly interfere with the learning of the student and learning of others. The student's eligibility is usually emotionally disturbed. The student demonstrates behaviors such as poor peer relationships, withdrawn or depressive moods, or repeated physical symptoms associated with school attendance or performance.

Programs for Autistic Learners (PALS) – A student's primary eligibility is autism. The student is not making adequate progress toward goals in other specially designed self-contained special education programs.

Designated Instructional Services (DIS)/Related Services – These services are provided by a specialist who provides specific services not usually implemented by general education or special education teachers. These services include, but are not limited to the following:

- Adaptive Physical Education
- Applied Behavioral Analysis
- Assistive Technology
- Audiological Services
- California Children Services
- Counseling Services
- Deaf/Hard of Hearing Supports
- Health and Nursing
- Home/Hospital Instruction
- Inland Regional Services
- Interpreting Services
- Low Incidence Disabilities
- Occupational Therapy
- Physical Therapy
- Psychological Services
- Special Circumstances Instructional Assistance
- Speech and Language Program
- Transportation
- Vision Services

The district does not provide preschool integration opportunities. It is in year one of developing a learning center approach and this is only at a couple of school sites. The district does not have guidelines or a plan to support the learning center approach. The documentation provided to FCMAT states the district does not have policies or procedures to include students with IEPs in general education classrooms although inclusion is listed as a continuum of services options. Staff indicate inclusion is not discussed districtwide at IEP meetings.

Staff report the district offers many options for students; however, it often agrees to parent preference for placement and services over the staff’s professional recommendations. Staff would like to see more inclusive opportunities for secondary students who are lower functioning, but socially aware. They also report a need for a program and service for students on the autism spectrum at the secondary level who are significantly affected.

According to the Performance Indicator Report (PIR) - State Performance Plan Indicators (SPPI) and Special Education Annual Performance Indicator Report (APIR) Measure, the district has not met Indicator 3 – Statewide Assessments in math in 2015-16 or 2016-17. The district is required to complete a multistep planning process and report to the CDE. The district also did not meet Indicator 5 – Least Restrictive Environment for students six through 22. At least 49.2% of these students should receive their special education services in settings apart from their nondisabled peers less than 80% of the time. The district’s level was 48.18%. No more than 24.6% of these students should spend less than 40% of time inside the regular class. The district’s level was 27.22%. Of greatest concern is Indicator 6 – Preschool Least Restrictive Environment, which is shown below.

Indicator 6 Results on the Annual Performance Measure for Corona-Norco Unified School District

Preschool Least Restrictive Environment. The percent of children ages three through five with IEPs attending the following:

- A. Regular early childhood program and receiving the majority of special education and related services in the regular program
- B. Separate special education class, separate school or residential facility

Measure	Total No. of Students receiving Special Education (Age 3-5)	No. of Students in the environment	Percent of students in environment receiving Special Education	Target This Year	Target Met?
A. Regular Program	879	112	12.74%	>41.8%	No
B. Separate	879	638	72.58%	<34.4%	No

Source: CDE 2015-16 District Level Special Education Annual Performance Report Measure

Recommendations

The district should:

1. Consider preschool services having walk-ins at more school sites for students with speech only services.
2. Develop a guideline for eligibility factors, frequency and duration for speech-only preschool students.
3. Develop guidelines for eligibility into the preschool four- and five-days per week programs.
4. Ensure all required members of the IEP team attend all IEP meetings.

5. Develop integration opportunities with nondisabled peers beginning in preschool.
6. Consider providing services in general education preschool programs.
7. Ensure all special education staff and students have equal access to the same and current districtwide curriculum.
8. Consider developing work groups to design learning center models across the district including professional development, policies and procedures.
9. Increase K-22 year old inclusion opportunities and discuss options at every IEP meeting.
10. Review the districtwide need for a program to support secondary-level students who are lower functioning but, socially aware.
11. Review the districtwide need for a program to support students at the secondary level with autism spectrum disorder.
12. Complete and implement a plan to reduce the out-of-compliance target rates as reported by CDE on the Annual Performance Indicator Report to include, LRE for preschool and K-22, and statewide assessments.

Special Education Staffing and Caseloads

The district operates a varied range of mild/moderate services for K-12 students. The district practices site-based decision-making, and interviews with staff and review of district-provided documents indicate a significant variation among school sites in both the title and function of mild/moderate services to students. Documents show a minimum of 10 titles for RSP-type services at the elementary level alone. The program titles are RSP, RSP Gen Ed, NSH, RSP NSH, NSH K AM, RSP K, RSP/SDC, RSP/VI, RSP/Speech, RSP (1-3). These service titles reflect variation in service delivery models. Interviews with staff indicate there is no consistent approach to blending the services and resources of traditional RSP programs with mild/moderate SDCs, frequently recognized in the profession as specialize academic instruction (SAI). Staff interviews and record reviews indicate a more concerted effort is made to combine RSP and nonseverely handicapped SDC services at the 7-8 grade level. Those services are commonly referred to in this district as RSP/NSH. At the 9-12 level there is a spectrum of service models for mild/moderate support. Regardless of title, district documents and interviews indicate the caseload standard for RSP service in all variations is consistent with Education Code (EC) 56362(c) requirements at 28 students per teacher FTE.

Determining accurate caseloads in every category of service delivery was difficult. As a result, all reporting of caseload averages in this report, as well as teacher FTE, must be considered as estimates. Multiple district provided spreadsheets and summaries requested from management staff were used in the attempt to acquire reliable and consistent data. Multiple documents provided for the study were cross-referenced in an attempt to establish accuracy and consistency. In the case of quantifying caseloads and teacher FTE for RSP services, one district-provided document that was more reliable still produced at least 15 possible teacher names without any identifiable caseload. This was despite multiple attempts to cross-reference among multiple district-provided sources. The study team made a thorough effort to resolve inconsistencies using the available data, but absolute accuracy in establishing total caseloads by type of service provider or grade level was impossible. The district would benefit from having the Special Education, Business Services and Human Resources departments rigorously analyze teacher staffing and student caseload data and routinely review and update it to ensure accuracy.

Caseload estimates are shown in the tables below. These estimates suggest that the district provides mild/moderate services to students with a higher level staffing than required by the Education Code and higher than industry standards for mild/moderate combined programs such as SAI. Based on available data, virtually all service models for mild/moderate students that could operate with a maximum caseload of 28 (by both district and Education Code standards) instead have average caseloads in the low 20s. This numeric analysis is contrary to the perceptions of staff members, who consistently expressed concern about high caseloads in the mild/moderate setting. Staff stated that the district solution to high RSP caseloads in the elementary setting is to inform parents of newly identified students that the RSP caseload at their neighborhood school site is full and their child can be served at another site that has room. If the parent chooses to remain at the affected neighborhood site, his or her child does not receive RSP service until a caseload vacancy becomes available at the site. Staff report that the site-based decision-making model generates site-specific solutions to issues with service provider caseloads, and the preferred approach is to add new staff. Interviews and documents suggest the amount of mild/moderate teacher split service between sites is limited. A full-time teacher will more likely be added, and the additional students moved to the new teacher from other affected sites in the process described above. Interviews with staff also indicate under these circumstances, overidentifica-

tion may occur when site staff, eager to identify the students on their own campus, accelerate eligibility determination instead of taking eligible students from other sites that will fill up their caseloads. Splitting additional RSP teacher support between sites more frequently instead of moving students between schools may improve efficiency and quality of service delivery on multiple levels. The many ways to handle a split assignment on any given campus can be stabilized through guidance from the Special Education Department on a range of approaches. The table below offers staffing comparisons for RSP and mild/moderate staffing levels compared to education code. Because of the factors described above, these figures must be considered estimates. Associated costs represented in the tables below include statutory benefits and health and welfare costs.

Resource Specialist Caseloads K-12 (including RSP/NSH)

Grade span	No. of FTE	Total caseload	District caseload average	EC caseload maximum	District guideline caseload maximum	Staffing FTE above (+) below(-) EC/district guidelines	Staffing cost (-) or savings (+) to the district
K-6	56.0	1078	19.25	28	28	+17.50	+\$1,953,228
7-8	31.0	670	21.61	28	28	+ 7.07	+\$789,104
9-12	53.0	1085	20.47	28	28	+14.25	+\$1,590,485

Source: District data and EC 56362(c)

The district operates a variety of SDCs. Mild/moderate SDC services can also vary from site to site and across grade levels. Based on district-provided documents, mild/moderate SDCs that are not actually blended with RSP services exist at all grade levels across the district. According to the document titled “Changes in Article 12 Class Size” Addendum to the Memorandum of Understanding (MOU) dated April 2014 between the district and the Corona-Norco Teachers Association, May 22, 2017, the district identifies a target caseload of 15 students for mild/moderate SDCs. Staff report that operating SDCs instead of a blended program at the mild/moderate level remains largely a site-based decision. At the elementary level, the district operates a PALS SDC, DHH SH SDC, SH SDC and II Program. The district has established caseload guidelines for classes that are largely consistent with industry standards as shown in the tables below.

Nonseverely Handicapped (Mild/Moderate) Special Day Classes

Grade span	No. of FTE	Total case-load	District case-load average	Industry standard caseload range	Staffing FTE above (+) below (-) industry standard	District caseload cap by policy	Staffing FTE above (+) below (-) district policy	Staffing cost (-) or savings (+) to the district
K-6	46.0	491	10.67	12-15	+13.27	15	+13.27	+\$1,481,105
7-8	2.0	40	20.00	12-15	-0.67	15	- 0.67	-\$74,781
9-12	17.0	384	22.59	12-15	-8.60	N/A	N/A	N/A

Source: District data and industry standard

Severely Handicapped Special Day Classes

Grade span	No. of FTE	Total case-load	District caseload average	Industry standard caseload range	Staffing FTE above (+) below (-) industry standard	District caseload cap by policy	Staffing FTE above (+) below (-) district policy	Staffing cost (-) or savings (+) to the district
K-6	7.0	103	14.70	10-12	- 1.58	12	-1.58	-\$176,349
7-8	5.0	50	10.00	10-12	within	15	+1.67	+\$186,394
9-12	11.0	154	14.00	10-12	-1.83	15	+0.73	+\$81,477
18-22 (age)	3.0	22	7.33	N/A	N/A	N/A	N/A	N/A

Source: District data and industry standard

Deaf Hard of Hearing Special Day Class

Grade span	No. of FTE	Total case-load	District case-load average	Industry standard caseload range	Staffing FTE above(+) below (-) industry standard	Staffing cost (-) or savings (+) to the district
1-6	1	11	11.0	8-10	- 0.10	-\$11,161
7-8	1	16	16.0	8-10	- 0.60	-\$66,968
9-12	2	29	14.5	8-10	- 0.90	-\$100,452

Source: District data and industry standard. Note: No district standard for DHH caseload

PALS Special Day Class

Grade span	No. of FTE	Total case-load	District caseload average	Industry standard caseload range	Staffing FTE above (+) below (-) industry standard	District case-load cap by policy Pre – 10 K-6 – 10 7-8 – 12	Staffing FTE above (+) below (-) district policy	Staffing cost (-) or savings (+) to the district
K-6	5.0	39	7.8	8-10	+ 1.1	10	+ 1.1	+\$122,775

Source: District data and industry standard

II Program

Grade span	No. of FTE	Total case-load	District case-load average	Industry standard caseload range	Staffing FTE above (+) below (-) industry standard	District caseload cap by policy	Staffing FTE above (+) below (-) district policy	Staffing cost (-) or savings (+) to the district
K-6	2.0	13	6.5	8-10	+ 0.70	12	+ 0.92	+\$102,684
7-8	2.0	9	4.5	8-10	+ 1.1	12	+ 1.25	+\$139,516
9-12	1.0	9	9.0	8-10	within	12	+ 0.25	+\$27,903

Source: District data and industry standard

The district operates a program for behavior support related to the autism spectrum disorder. Eight special education teachers on special assignment staff this program. Each teacher supervises paraeducators who provide support to identified students primarily in a general education setting. The paraeducator assignments range from six to eight hours in length. The number of paraeducators is split somewhat evenly between six-hour and eight-hour assignments. Student support provided by the paraeducator is either written into an IEP as a direct service or as consultation under related services depending on individual student needs. The paraeducators are generally itinerant and may serve more than one student at more than one site. While the operation of this program costs over \$3 million, the data for services and providers is maintained separately from other special education teacher and paraeducator totals. The related teacher and paraeducator FTE and estimated costs are reported below and include statutory benefits and health and welfare costs.

K-6 Autism Program Estimated Staffing/Cost

Staffing	Estimated FTE	Estimated cost	Industry standard
Teacher on Special Assignment	8.00 FTE	8 x \$111,613 = \$892,904	N/A
8 hr. Para	30.00 FTE	30 x \$46,509 = \$1,395,270	N/A
5 hr. Para	30.00 FTE	25* x \$34,882 = \$872,050	N/A
Total Cost		\$3,160,224	N/A

Source: District data

*Five-hour paraeducators were converted to industry-standard six-hour positions for estimated cost.

The district operates its own preschool programs located at two centralized locations. Those services consist of moderate severe autism preschool classes known as the PALS program and two levels of mild moderate preschool classes known as the ROCKET program. The district also offers a lower level of speech and language services identified as the walk-in program that is offered at several separate school sites. The two levels of classroom placement are the Rocket four-day program and the Rocket five-day program. Students in the five-day program receive a more intensive level of service than those in the four-day program. Interviews with staff indicate there is no clear criteria to determine placement between the four-day program and the five-day program. In addition to having fewer days of attendance, the four-day programs have shorter hours, and the teachers teach a morning/afternoon split. A comparison of caseloads between district guidelines and industry standards found the district preschool SDCs have a high level of staffing. The industry standard is typically one adult to seven students; however, the district guideline is one adult to five students as shown in the district provided document, "Classroom Staff per Program and Student/Adult Ratio." Analysis of district-provided preschool caseloads indicates a ratio lower than both the district guideline and industry standard. Interviews with district staff do not indicate a distinction between the populations served in the four-day Rocket program compared to the five-day Rocket program. They are not classified as either mild/moderate or moderate/severe. Staff interviews indicate that in practice, students who transition from the four day Rocket program are more likely to attend a general education kindergarten class with some support. Students from the five-day Rocket program are more likely to be placed in an elementary SDC although it may be either a mild/moderate SDC or a moderate/severe class. For comparison to industry standards in this study, both the four-day and five-day Rocket programs are regarded as mild/moderate special day classes. The district soft cap caseload for the four-day and five-day Rocket programs is 15 students per session. The caseload/ratio does not include 1-to-1 paraeducators.

Preschool Special Day Class – 4-Day Rocket Including Paraeducators

Teacher FTE	Total students AM and PM	4 Day classroom para AM and PM (3 hr.)	l:l para (3 hr.)	Industry standard (M/M) adult to student ratio	District standard for Rocket adult to student ratio	District adult to student ratio AM and PM (teacher + classroom para)	Staffing above (+) below (-) industry standard	Staffing above (+) below (-) district standard
12.0	AM: 163 PM: 133	AM: 20.0 PM: 17.0	1.0	1:7 adult to student	1:5 adult to student	AM: 1:5.1 PM: 1:4.6 adult to student	AM: + 8.72 PM: +10.0 adults	AM: -0.6 PM: +2.4 adults

Source: District data and industry standard. Note: District Soft Cap for Caseload per FTE is 30

Preschool Special Day Class – 5-Day Rocket Including Paraeducators

Teacher FTE	Total students	Classroom para (3 hr.)	l:l para (3 hr.)	Industry standard (M/M) adult to student ratio	District standard for Rocket adult to student ratio	District adult to student ratio (teacher + classroom para)	Staffing above (+) below (-) industry standard	Staffing above (+) below (-) district standard
10.0	115	38.0	2.0	1:7 adult to student	1:5 adult to student	1:2.4 adult to student	+ 31.58 adults	+25 adults

Source: District data and industry standard. Note: District Soft Cap for Caseload per FTE is 15

Preschool PALS Special Day Class

Teacher FTE	Total students	Classroom para (3 hr.)	l:l para (3 hr.)	Ed. Code Standard (M/S) adult to student ratio	District standard for PALS adult to student ratio	District adult to student ratio (teacher + classroom para)	Staffing above (+) below (-) industry standard	Staffing above (+) below (-) district standard
3.0	22	12.7*	N/A	1:5 adult to student	1:2 adult to student	1:1.5 adult to student	+ 11.3 adults	+4.7 adults

Source: District data and EC 56441.5. District Soft Cap for caseload per FTE is 10

*Two para positions are currently vacant with a substitute

The preschool walk-in program is for speech-only students who need less support for language development delays. The students in the walk-in program attend speech services provided by speech language pathologists (SLPs) at designated sites. Parents provide transportation as necessary. The district hires SLPs whose only assignment is to provide service to the walk-in population with a maximum caseload of 40. Walk-in services are provided at a few geographically selected sites. This procedure contrasts with the more common practice where the designated SLP at a neighborhood school serves the speech-only preschoolers at their neighborhood school as part of their total SLP population. When caseload limits are exceeded in this population, the district typically hires additional walk-in speech SLP service providers.

Recommendations

The district should:

1. Consider more RSP teacher assignments that are divided between school sites that would result in moving staff rather than moving students from their neighborhood schools.
2. Consider developing a recommended range of options for implementing the division of students and duties when adding a part-time RSP teacher for caseload support at any school site.
3. Review and consolidate RSP and mild/moderate service titles and delivery models to maximize efficiency and consistency.
4. Review the staffing levels of RSP service providers to determine if staffing adjustments are warranted.
5. Develop an effective and consistent tracking system for special education teacher assignments and caseloads that is updated monthly.
6. Have the Special Education, Business Services and Human Resources departments rigorously analyze teacher staffing and student caseload data and routinely review and update it to ensure accuracy.
7. Review the autism program structure to determine efficient use of district resources and student benefit.

Instructional Aide and Paraeducator Staffing

The district operates with five-hour classroom paraeducators as the standard for support to special education teachers and students, but a few six- to eight-hour paraeducators remain primarily because of the historic retention of discontinued positions. The district has reduced these six- to eight-hour positions through attrition. A search of position control data found a minimum of 23 different job titles and position control numbers for paraeducators. Management reports that the district is undergoing a paraeducator classification review to consolidate and revise existing paraeducator job titles and descriptions. The district processes used to track and review paraeducator staffing is inconsistent and inaccurate. Staff report that one Special Education Department management employee and clerical staff member are responsible for this process. They have devised their own data spreadsheet for this purpose, yet the accuracy depends on the data received from field staff. FCMAT's document review and staff interviews found no consistent process for gathering and reporting this information. As a result, there are many gaps and inconsistencies. For example, the district operates an autism-related behavior support program that consists of supervising teachers on special assignment and 60 paraeducators hired at the most expensive classification for that position. These 60 paraeducators do not appear in the department paraeducator tracking process described above. The district provided no reason for tracking these 60 paraeducators separately except that other department management staff are responsible for overseeing the program. Staff report that additional inconsistencies occur when districtwide budget planning begins. Information on necessary special education staffing levels arrives several times during the second semester, necessitating budget-planning revisions through the end of the school year.

While the district prefers to use five-hour paraeducators, a review of district-provided records suggests clear practices and procedures that provide extra hours to paraeducators in certain circumstances. Extra hours for some paraeducators appear in position control. The district did not provide a clear explanation of the circumstances and positions entitled to pre-established extra hours, how they are allocated, and who approves the allocation.

A paper request is initiated to make a mid-year request for additional paraeducator staff, but no consistent procedures appear to be used to help determine if any existing staff can be reassigned to fill the requested need. Related to the addition of 1:1 paraeducator support, the district is revising its special circumstances individual assistance guidelines for medical support and behavior support. A review of the new guidelines (yet to be released to staff) indicates that they are thorough and consistent with similar guidelines used by districts across the state. Interviews with staff found that the use of the district's previous guidelines was inconsistent at best, if not bypassed through means such as hiring emergency substitute paraeducators and allowing these positions to become permanent without review or administrative determination and approval.

The district conservatively assigns five-hour paraeducators to most special education programs instead of the industry standard of six-hour paraeducators. It also has three-hour paraeducator assignments scattered throughout its programs and services. To compare the five-hour paraeducator positions to industry standard six-hour positions, the five-hour positions were mathematically converted into six-hour equivalents so that similar levels of staffing and costs could be compared. Three-hour positions were also appropriately converted for comparison. Given the gaps in accurate data on staffing and the variations in paraeducator job titles and pay rates, an average cost for a six-hour paraeducator position including salary, statutory benefits and health and welfare costs was calculated for this study. That figure was used in a cost analysis as indicated above by converting district paraeducator hours into six-hour equivalents.

The tables below indicate that the district may experience some paraeducator cost containment by assigning five-hour and three-hour paraeducators. A analysis of district-provided data suggests that potential cost containment in this instance might be negated by the addition of 1-to-1 paraeducators and the standard practice of providing extra hours to classroom paraeducators. The tables below do not include any of the paraeducator costs reflected in the standard assignment of extra aide hours since no way to quantify that factor could be found.

Resource Specialist Services and NSH at Secondary Level

Grade span	Teacher FTE	District 5 hr. para totals converted to 6 hr. FTE	District avg. teacher FTE per 6 hr. para FTE	Industry standard teacher FTE per 6 hr. para FTE	6 hr. para FTE above (+) below (-) industry standard	Para cost (-) savings (+) to district
K-6 RSP	56.0	45.60	1:0.81	1:1.0 FTE	- 10.40	-\$362,773
7-8 RSP/NSH	31.0	27.50	1:0.89	1:1.0 FTE	- 3.50	-\$122,087
9-12 RSP/NSH	53.0	39.12	1:0.74	1:1.0 FTE	- 13.88	-\$484,162

Source: District data and industry standard

NSH Special Day Class Mild Moderate

Grade span	Teacher FTE	District 5 hr. para totals converted to 6 hr. FTE	District avg. teacher FTE per 6 hr. para FTE	Industry standard teacher FTE per 6 hr. para FTE	6 hr. para FTE above (+) below (-) industry standard	Para cost (-) savings (+) to district
K-6	46.0	47.00	1:1.02	1:1.0	+ 1.00	+\$34,882
7-8	2.0	1.66	1:0.83	1:1.0	- 0.34	-\$11,860
9-12	17.0	12.50	1:0.74	1:1.0	- 4.50	-\$156,969

Source: District data and industry standard

Severely Handicapped Special Day Class (Moderate/Severe)

Grade span	Teacher FTE	District 5 hr. para totals converted to 6 hr. FTE	District avg. teacher FTE per 6 hr. para FTE	Industry standard teacher FTE per 6 hr. para FTE	6 hr. para FTE above (+) below (-) industry standard	Para cost (-) savings (+) to district
K-6	7.0	15.00	1:2.14	1:2.0	+1.00	+\$34,882
7-8	5.0	9.17	1:1.83	1:2.0	- 0.83	-\$28,952
9-12	11.0	19.17	1:1.74	1:2.0	- 2.83	-\$98,716

Source: District data and industry standard

PALS Special Day Class

Grade span	Teacher FTE	District 5 hr. para totals converted to 6 hr. FTE	District avg. teacher FTE per 6 hr. para FTE	Industry standard teacher FTE per 6 hr. para FTE	6 hr. para FTE above (+) below (-) industry standard	Para cost (-) savings (+) to district
K-6	4.0	11.17	1:2.79	1:2.0	+ 3.17	+\$110,576
7-8	1.0	2.83	1:2.83	1:2.0	+ 0.83	+ \$28,952
9-12	N/A					

Source: District data and industry standard

II Program Special Day Class

Grade span	Teacher FTE	District 5 hr. para totals converted to 6 hr. FTE	District avg. teacher FTE per 6 hr. para FTE	Industry standard teacher FTE per 6 hr. para FTE	6 hr. para FTE above (+) below (-) industry standard	Para cost (-) savings (+) to district
K-6	2.0	6.83	1:3.42	1:2.0	+ 2.83	+\$98,716
7-8	2.0	6.00	1:3.00	1:2.0	+ 2.00	+\$69,764
9-12	1.0	3.17	1:3.17	1:2.0	+ 1.17	+\$40,812

Source: District data and industry standard

1:1 Paraeducator Costs

Grade span	Service type	Dist. 5 hr. paras total converted to 6 hr. FTE	Total cost
K-6	RSP/All	46.17	\$1,610,502
K-6	NSH SDC	45.83	\$1,598,642
K-6	SH SDC	20.66	\$720,662
K-6	PALS	6.50	\$226,733
7-8	RSP/NSH	22.00	\$767,404
7-8	NSH SDC	2.50	\$87,205
7-8	SH SDC	9.17	\$319,868
9-12	RSP/NSH	27.50	\$959,255
9-12	NSH SDC	5.00	\$174,410
9-12	SH SDC	24.17	\$843,098
Total 1:1 Cost			\$7,307,779

Source: District data

Recommendations

The district should:

1. Conduct an accurate analysis of paraeducator staff costs based on salary and benefits.
2. Ensure the implementation of the revised special circumstance individual assistance guidelines in all decisions on providing 1-to-1 paraeducator support.
3. Ensure that all facets of district administration and school site administration fully support the established procedures for determining the need for additional paraeducator support.
4. Ensure that goals and objectives for student independence from 1-to-1 paraeducator support are included in the IEP of every student receiving this support and are reviewed/modified at each annual IEP as needed.
5. Develop a monthly internal procedure to monitor the status of existing paraeducator assignments that is based on direct, accurate, and current information from all school sites. Determine which department level staff position(s) could assume responsibility for acquiring the site level instructional assistant status information. The assigned department staff should communicate the information to the department administrator on a consistent monthly schedule. The responsible administrator should prepare thorough and accurate reports on paraeducator status for review at monthly administrative special education departmental meetings.
6. Ensure that the Special Education, Human Resources and Business departments meet consistently to review and confirm all paraeducator positions and data.
7. Utilize the current paraeducator classification process as an opportunity to consolidate paraeducator positions.
8. Develop and follow procedures to determine when existing staff may fill the need for a mid-year request for additional paraeducator support prior to hiring new staff to fill those positions

Related Service Provider Staffing and Caseloads

School Psychologists

Position control documents indicate that the district employs 41 full-time school psychologists. These psychologists represent a combination of district employees and staff hired through NPA contracts. Staff interviews and document review indicate the standard role and responsibilities for school psychologists generally comply with state and professional standards. Several school psychologists maintain assignments that are unique and/or do not apply to the K-12 student population. These include 2.0 FTE psychologists who are assigned to the preschool population, 2.0 FTE psychologists who are assigned to educationally related mental health services (ERMHS) and 1.0 FTE psychologist who is assigned as a behavior specialist. To provide an accurate representation of average school psychology caseloads specific to public education in California, the comparison below is made from the respected independent source CalEdFacts that analyzes current data on support services in public education. The CalEdFacts psychologist analysis is based on service to the K-12 general population and does not break out specialized psychologist assignments from within the K-12 populations. Accordingly, the 2.0 FTE that serve the preschool population are not included in this comparison, but the 2.0 FTE who support ERMHS services exclusively are included.

School Psychologist Caseload (Excluding Preschool)

Provider	No. of FTE	Total caseload (all students)	Industry Standard Students per provider FTE Average	District Staffing Students per provider FTE Average	Staffing FTE if based on Industry standard	District Staffing Above (+) Below (-) Industry Standard
Psychologist	39*	54,052	1,050	1,386	51.48	- 12.48

Source: District data and CalEdFacts. *Note: does not include 2 psychologists assigned full time to preschool

Speech and Language Pathologists

Position control documents indicate that the district employs or contracts approximately 75.60 FTE speech language pathologists (SLPs). Like most public school districts, Corona-Norco Unified attempts to employ district SLPs before contracting with NPAs for that service. SLP caseload guidelines are addressed in EC 56363.3 for K-12 and 56441.7(a) for preschool. Corresponding with the caseload data tracking issues previously described, the caseloads reported below must be considered estimates until effective and accurate data tracking systems are established for the Special Education Department. The table below breaks out preschool SLP staffing separately from K-12 SLP staffing. Preschool SLP direct service is provided by a total of 16.75 FTE. This includes service on the preschool assessment team, service to the Rocket four-day and five-day SDCs and centralized service for walk-in speech-only preschool students. As indicated in the previous discussion of preschool services, the use of SLPs dedicated solely to preschool speech-only students is relatively unique in SLP industry standard service models. Staff report the district does not have an elementary SLP specific RtI program for mild articulation-only students in the primary grades. Many districts in the state have developed early intervention support that can operate independently of any other RtI initiative that may or may not occur in the district. The benefit of such an approach is a potential reduction in the number of students identified for special education on the basis of mild speech disorders only.

Speech and Language Pathologist Caseload

Provider	Total SLP FTE to Total Caseload	District Average Caseload Ratio	Ed Code Maximum FTE to Caseload Ratio	District Staffing Above (+) / Below (-) Ed Code Standard
Speech language Pathologist Ratio K-12	58.85:3,096	1:52.61	1: 55	+ 2.56
Speech Language Pathologist Ratio Preschool	16.75:561	1:33.49	1:40	+ 2.73

Source: District data, EC 56441.7(a) and EC 56363.3.

Adaptive Physical Education and Deaf, Hard of Hearing

The adaptive physical education (APE) and deaf, hard of hearing service providers are shown in the tables below. The APE services are within normal limits. The deaf, hard of hearing services is understaffed by approximately 0.83 FTE when compared to industry standards for this service. School nurses are not reflected in the tables below since they are employed only under general education. Interviews with staff indicate it would be helpful for school nurses to have access to SEIS in the “read only” format. All occupational therapy (OT) and physical therapy (PT) related services are provided through contractors, and no caseload data was provided by the district.

Adaptive PE Teacher Caseload

Provider	No. of FTE	Total Caseload	District APE FTE to Student Ratio	Industry Standard (APE FTE to Student Ratio)
Adaptive PE Teacher	9	445	1:49	1:45-55

Source: District data and industry standard

Deaf, Hard of Hearing Caseload

Provider	No. of FTE	Total Caseload	District DHH Specialist FTE to Student Ratio	Industry Standard (DHH FTE to Student Ratio)
DHH Specialist	3	115	1:38.33	1:20-30

Source: District data and industry standard

Recommendations

The district should:

1. Review preschool SLP caseloads over the school year to determine an appropriate staffing level for speech services in preschool.
2. Consider the benefit of an SLP response to intervention program for primary grade students with mild articulation only speech disorders.
3. Review the preschool walk-in service model for staffing efficiency and student progress/benefit.

4. Review the staffing levels of school psychologists and DHH specialist to determine if staffing adjustments may be warranted.
5. Review NPA provider OT/PT caseloads to determine staffing efficiency compared to the industry standard of one FTE to 45-55 students.
6. Allow nurses to have view/read only access to SEIS.

Nonpublic Schools and Agencies

Education Code 56034 defines a nonpublic school (NPS) as follows:

A private, nonsectarian school that enrolls individuals with exceptional needs pursuant to an individualized education program and is certified by the department. It does not include an organization or agency that operates as a public agency....an affiliate of a state or local agency, including a private, nonprofit corporation established or operated by a state or local agency, or a public university or college. A nonpublic, nonsectarian school also shall meet standards as prescribed by the Superintendent and board.

NPS is an option in the continuum of service for disabled students. Students are placed in an NPS when their unique needs outlined in an IEP require specialized programs that are unavailable in the district. The district negotiates NPS contracts and develops individual service agreements for the students served.

Total Enrollment in Nonpublic Schools 2015-16 and 2016-17

School Year	Number of NPS Students	Annual Cost of NPS
2015-16	79	\$2,494,481
2016-17	71	\$2,601,835

Source: District provided documents/NPS contracts 2015-16 and 2016-17

The Special Education Department has a protocol to manage NPS/NPA contracts. The board annually approves a master contract for each NPS/NPA. Individual service agreements are created for all students receiving NPS/NPA services. Costs are tracked by purchase order, actual costs to date, and the number of students receiving services. The current duties and responsibilities chart for 2017-18 indicates this responsibility is assigned to the administrative director/SELPA and the administrative director of special education. In most single-district SELPAs, the SELPA administrator retains this responsibility.

The annual cost of NPS in 2016-17 tracking documents do not reflect the reduction of eight NPS students for the same year. Instead of a reduction, the district incurred additional tuition costs for fewer students at a total of \$2,601,835, which exceeds the 2015-16 amount by \$107,354. At a minimum, these costs should be monitored annually to ensure accuracy in total annual costs for NPS. Greater efficiency can be achieved by monitoring expenditures in this area monthly as students enter or exit NPS programs.

Staff indicated that there is a gap in the process of oversight of NPS/NPA. The district has a process to create a contract, but no system for oversight of the document. The Business Services Department needs more information about the services provided through NPA. More communication between Special Education and Business is necessary, and clarity of administrative responsibility is necessary.

Some staff are confused about which NPA/NPS elements are required for board approval of a settlement agreement. The district does not have a protocol for business and special education staff to follow in these cases. This issue is further compounded by the fact that the responsibility for fiscal oversight of settlement agreements for NPA/NPS rests with two administrators, the administrative director/SELPA and the administrative director of special education. The administrative director/SELPA should develop a protocol for settlement agreements requiring board approval, and ongoing communication should accompany the new protocol.

The departments do not have an ongoing mechanism for discussion and communication on issues involving NPAs and NPSs. Fiscal staff indicated that they would like some cross training on the IEP process and the components of NPS contracts.

The district should consider creating district programs for NPSs that have high enrollment numbers such as Bright Futures. During 2015-16, the district spent \$535,238 for 23 students. Those services continued in 2016-17, costing \$482,984 for 16 students at the same NPS site. The district should focus on building internal capacity to avoid costly placements in NPSs, particularly those with large numbers of students. NPSs are one option on the continuum of service for students with disabilities, but every consideration should be given to creating district programs to meet student needs. Many factors should be considered in creating specialized district programs such as available facilities, access to staff and training and support capacity.

Education Code NPA requirements are the same as those for NPSs. EC 56365(a) requires an NPA to be “under contract with the local educational agency to provide the appropriate special educational facilities, special education, or designated instruction and services required by the individual with exceptional needs if no appropriate public education program is available.”

For budget and reporting purposes, the business staff combines NPS and NPA expenses. Separating these costs would help special education monitor and track expenditures, and this can be easily accomplished by using separate standardized account code structure (SACS) object or goal codes.

NPA includes the following three main expenditures:

- The cost to hire certificated replacements to staff open unfilled positions in speech, occupational and physical therapy, nursing and autism. This category is the largest of the three listed and reflected in the chart below.
- The cost of related or compensatory services (usually from settlement agreements).
- The cost for individual education evaluations (IEE), which are permitted under IDEA.

Most of the NPA costs are in the hiring of certified replacement staff when the district is unable to fill positions. The use of NPAs can be problematic for districts because of supervision. For instance, a contracted nurse providing specialized health care works under the supervision of the credentialed school nurse. However, if a district nurse is concerned about the implementation of a health care procedure by a contracted employee, the nondistrict employee cannot be disciplined by the district, and the district must involve the NPA. The other obstacle is the conflict of interest that can occur when the agency staff member completes an assessment to determine the need for the service.

Total Annual Cost for NPA Services for Open Unfilled Positions in 2017-18

Position	NPA Staff	Cost Per Staff	Annual Costs
Psychologists	7 positions	\$140,101	\$980,704
Speech and Language Pathologists	9 positions	\$129,384	\$1,164,457
Occupational/Physical Therapists	27 positions	\$112,033	\$3,024,878
Applied Behavior Analysis (ABA) Instructional Aides	25 positions	\$96,000	\$2,400,000
Nursing	Itinerant District	Not calculated	\$265,000
Total			\$7,633,170

Source: District purchase orders 2017-18

Psychologists

Over the past few years, the district has contracted for psychological services when it could not find qualified district staff. This is the common practice in most districts, but it is unusual for districts to choose to carry contracted staff forward year after year instead of attempting to hire for those positions. The average cost of a school psychologist with full compensation in the district is \$128,015. The average cost of a psychologist hired through a NPA for the 2017-18 school year is \$140,101. The total cost for seven contracted psychologists exceeds the district psychologists by \$84,602 excluding additional costs for overtime and mileage that may be submitted by the agency. Continuing to use NPA personnel, these costs are not reflected in the proposed staffing plan or related staffing costs for special education the next year.

Speech and Language Pathologists

The district has also contracted for speech therapy services when it cannot hire qualified district staff. This practice continued for the past few years and has reached nine positions in 2017-18. The average cost of a district speech pathologist with full compensation is \$126,628. The average cost of a speech pathologist hired through a NPA for the 2017-18 school year is \$129,384. The total cost of nine contracted speech pathologists exceeds district speech pathologists by \$24,804. These costs are also not included in the proposed staffing plan or related staffing costs for special education the next year.

Occupational/Physical Therapists

The district does not have staff positions for occupational (OT) or physical therapists (PT) and like most districts relies on contract staff to provide these related services to students with disabilities. The total cost of OT/PT services is \$2,823,009 for 2017-18, and the cost per therapist is \$104,556.

FCMAT reviewed the contract for OT/PT and found that it includes some unexpected excess costs. The district pays \$113,430 for one full-time supervisor through contracted services. The staff indicated that there is another supervisor, but FCMAT was unable to confirm that. The certified occupational therapy assistants are billed at \$110,214, which is higher than the cost of some OTs. This is also true of the PT assistants.

Breakdown for Occupational and Physical Therapy NPA Costs

Positions	Number	Cost
Supervisor	1	\$113,430
Occupational Therapist	14	\$1,528,772
Certified Occupational Therapy Assistant	6	\$661,284
Physical Therapist	4	\$434,017
Physical Therapy Assistant	1	\$110,214
Other	1	\$177,161
Total	27	\$3,024,878

Source: District master contracts for 2017-18

Some districts have created district OT positions to avoid the excess costs of contracted services. In doing so the district must consider the unit where this position is assigned. This position does not meet the credential requirements for certificated staffing in school districts, but it requires graduate training. For example, the Poway Unified School District created the class title of

occupational therapist and placed it in the office, technical, business services and paraprofessional unit. The salary range without benefits is \$52,910 to \$67,754. A copy of the Poway Unified job description is attached as Appendix A to this report.

ABA Instructional Aides

The district also contracts with various NPAs for a range of supervision and intensive individual services as shown below.

Vendor	Service	Number of students	Cost
Autism Behavior Consultants	Case Supervision, Intensive 1:1, Clinical Director	6	\$273,934
Autism Behavior Services	Behavior Design and Planning Behavior Intensive Services	2	\$190,200
Autism Spectrum Consultants	Clinic Hours; Clinic Supervision, therapist in home	1	\$93,453
California Psychcare	BCBA Supervision, Intensive 1:1	6	\$432,888
Center for Autism Related Disorders (CARD)	Clinical Attendance, Intensive 1:1 at home and at school	6	\$466,525
Proof Positive ABA Therapies	Intensive 1:1	10	\$483,047
The Wylie Autism and Sensory Intervention Center	Intensive 1:1, supervision	4	\$131,255
Total		35	\$2,071,302

Source: District master contracts 2017-18

Nurses

Most districts requiring specialized health care services for students with medical disabilities hire agency nurses. Agency nurses provide specialized health care designated in a written plan by a doctor. They work under the supervision of district nurses and provide services on a 1-to-1 itinerant basis.

Recommendations

The district should:

1. Review NPS/NPA costs annually to confirm the enrollment and costs at year-end in a meeting with the special education and business staff. Once this practice is established, the review should take place monthly to balance the costs of program changes.
2. Clarify administrative responsibility for the NPA/NPS contracts with both the business and special education staff.
3. Create a protocol for the use of NPA/NPS services in due process settlement agreements that are required for board approval. Include timelines, required elements, staff responsible, and required internal approvals. Also include specific protocols to prepare settlement agreements for the board packet.
4. Explore the feasibility of creating district specialized programs for students enrolled in NPSs.

5. Separate NPS/NPA expenditures in the budget with the use of separate standardized account code structure object or goal codes.
6. Assign special education and business staff to meet at least quarterly to discuss efficiency issues related to all contracting for NPS/NPA contracts.
7. Avoid conflict of interest when agency staff are required to assess to determine the need for services. In these cases, use district staff to assess and agency staff to provide the service.
8. Provide cross training for business and special education staff on protocols for NPS/NPA contracting.
9. Analyze the costs of district versus agency staff for psychologist and speech therapy positions and determine if it is more efficient to hire district staff.
10. Consider creating district positions for occupational therapy and physical therapy to reduce the overall cost of services.
11. Consider creating program options for students with autism and intensive behavioral needs instead of contracting.

Due Process, Mediation and Settlements

The IDEA requires school districts to implement all procedural safeguards for children with exceptional needs. When disputes arise over the identification, assessment, educational placement or the provision of a FAPE, the procedures outline the steps to resolve disagreements at the lowest level (EC 56500.3). Special education is a highly litigated area of federal law, with the primary basis of litigation being disputes over providing a FAPE. This is the primary basis of disputes at Corona-Norco Unified. Based on other districts reviewed by FCMAT, the number of filings for due process is not excessive.

Summary of Mediation, Resolution and Settlement Costs under IDEA

School Year	Issue	Resolution	Settlement Costs	Parent Attorney Fees
2014-15	FAPE	4 cases	\$259,065	\$22,000
2016-17	FAPE	10 cases	\$371,720	\$54,950

Source: District provided data
No data was provided for 2015-16

The district makes every effort to resolve differences with parents at the lowest level and has successfully done so with all issues. The district has not filed for a due process hearing in the three years reviewed by FCMAT. Staff indicated that assessments are often not defensible for the district to move forward. More training is needed for staff in the necessary components of evaluations to provide a FAPE to disabled students.

Summary of Attorney Fees for the District under IDEA

Attorney Fees for the District	Cost
2014-15	\$236,351
2015-16	\$227,343
2016-17	\$364,409

Source: District provided data

Recommendations

The district should:

1. Continue to resolve issues through alternative dispute resolution and informal mediations.
2. Ensure that all staff are trained in appropriate aspects of evaluation to be more defensible in providing a FAPE.

Organizational Structure

FCMAT reviewed the Special Education Department's organizational structure and staffing in the district's central office to determine whether clerical and administrative support is sufficient and whether the overall functionality is aligned with that of single-district SELPAs of comparable size and structure.

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

Certificated Support Positions

For the comparison, FCMAT chose the Capistrano, San Bernardino City and Santa Ana unified school districts. These districts are similar based on enrollment size and overall special education enrollment in addition to being single-district SELPAs.

FCMAT has found that the incidence of students with autism in a district affects staffing at all levels in the department, including special education administration. FCMAT compared the district's incidence of autism in the three comparison districts. The total number of students with autism as the primary disability was reported by district of residence. These comparisons indicate that Corona-Norco Unified is below the average (14%) identification rate for students with autism in comparable districts.

Current Percentage of Students with Autism in Comparable K-12 Single-District SELPAs

	Total Enrollment	Total Students with IEPs*	% Students with autism
Corona-Norco	53,157	6,852	11.6%
Capistrano	53,613	5,783	15.9%
San Bernardino City	53,152	6,472	11.4%
Santa Ana	54,505	6,662	14.8%

Source: CALPADS 2016-17; DataQuest, Dec. 2016, District of Residence

*Number includes infants and preschool students.

The district has 18 special education administrative support positions in the special education office, which aligns with comparison districts. These positions are: two administrative directors, two directors, two coordinators, one supervisor and 11 program specialists.

The role of program specialists as supervisors is different in many districts. EC 56368 requires program specialists to hold a valid special education credential, clinical services credential, health services credential or a school psychologist authorization and have advanced training and experience in special education. It does not require an administrative credential. Many districts in California have designated program specialists as administrators and therefore require administrative credentials. Among the comparison districts, Capistrano Unified is the only district that requires an administrative credential for program specialists. It is a common practice to list program specialists as part of the district's administration; however, duties are assigned based on credentials. For example, program specialists with administrative credentials can supervise staff and have more authority in IEP meetings.

FCMAT found that the district's program specialists might not be used as efficiently as they could be to support programs and services for students with disabilities. They are assigned to multiple sites and attend meetings when a change in placement is required and/or problematic IEPs on request. Program specialists do not have full authority to offer all services or placements, which limits their ability to make decisions in IEPs that affect district resources. This can be problematic for administration and affect compliance with state and federal laws for IEP meeting attendance.

Administrative Support Positions in Comparable Districts

Certificated Positions	Corona-Norco	Capistrano	San Bernardino City	Santa Ana
Assistant Superintendent/SELPA		1	1	1
Administrative Director Special Education	1			
Administrative Director/SELPA	1			
Executive Director		3	3	
Director	2	1	1	1
Coordinator	2*	6	5	2
Program Specialist	11**	6	3**	9**
Supervisor	1			
Principal (Segregated Site)				1
Assistant Principal			2	
Teachers on Special Assignment			1	
Curriculum Specialist				1
Legal Specialists			2	
Total:	18	17	18	15
***Average Administrative Positions of Capistrano, San Bernardo City and Santa Ana = 17				

Source: Data provided by individual districts

*Since FCMAT's visit, the district has reduced one coordinator position

**Program specialists on teacher salary schedule

***Total average does not include Corona-Norco

Functionality

Each of the comparable districts has special education structures that contain four specific administrative responsibilities:

- **Assistant superintendent/SELPA director:** Responsible for the leadership and management of the SELPA with the primary responsibility of developing, implementing, evaluating and refining special education programs and services, fiscal oversight, due process and compliance with state and federal laws for students with disabilities and staff evaluation.
- **Executive director/director:** Responsible for directing and managing the day-to-day operations of all special education programs and services, maintaining the staffing plan for the department, directing oversight of staff and programs, maintaining the Special Education Information System (SEIS), overseeing coordination of special education transportation, compliance and alternative dispute resolution and staff evaluation.

- **Coordinators:** Under the direction of a director, plan, organize and work collaboratively with principals to provide programs and services for students with disabilities.
- **Program specialists:** Facilitate and coordinate services for students with disabilities and support school site administrators.

The district does not align with comparable districts in the functionality of administrative positions. In a large district, the administrative staff can build greater capacity by avoiding duplication of effort.

FCMAT found many instances where positions had duplicate responsibilities. For example, the administrative director/SELPA and a director are both responsible for the oversight of the SEIS; the administrative director of special education and the administrative director/SELPA both have fiscal oversight for NPS/NPA expenditures.

The administrative director of special education has oversight responsibilities for all related service providers, psychologists, and speech pathologists as well as oversight of programming in eight school sites. These should be the responsibility of a director or coordinator. The administrative director/SELPA, director and coordinator share the responsibility for alternative dispute resolution and due process. In comparable districts, those duties would be performed by the administrative director/SELPA who maintains responsibility for expending district resources that need to be approved by the board in settlement agreements.

There is no clear delineation of responsibilities for the coordinators, supervisor and program specialists in the district. The job description for the supervisor position was developed in 2012 and met the district's needs at that time; however, this position does not operate within the job description. For example, it does not make recommendations for the hiring of certificated and classified staff or become involved in any evaluation of certificated and related services staff.

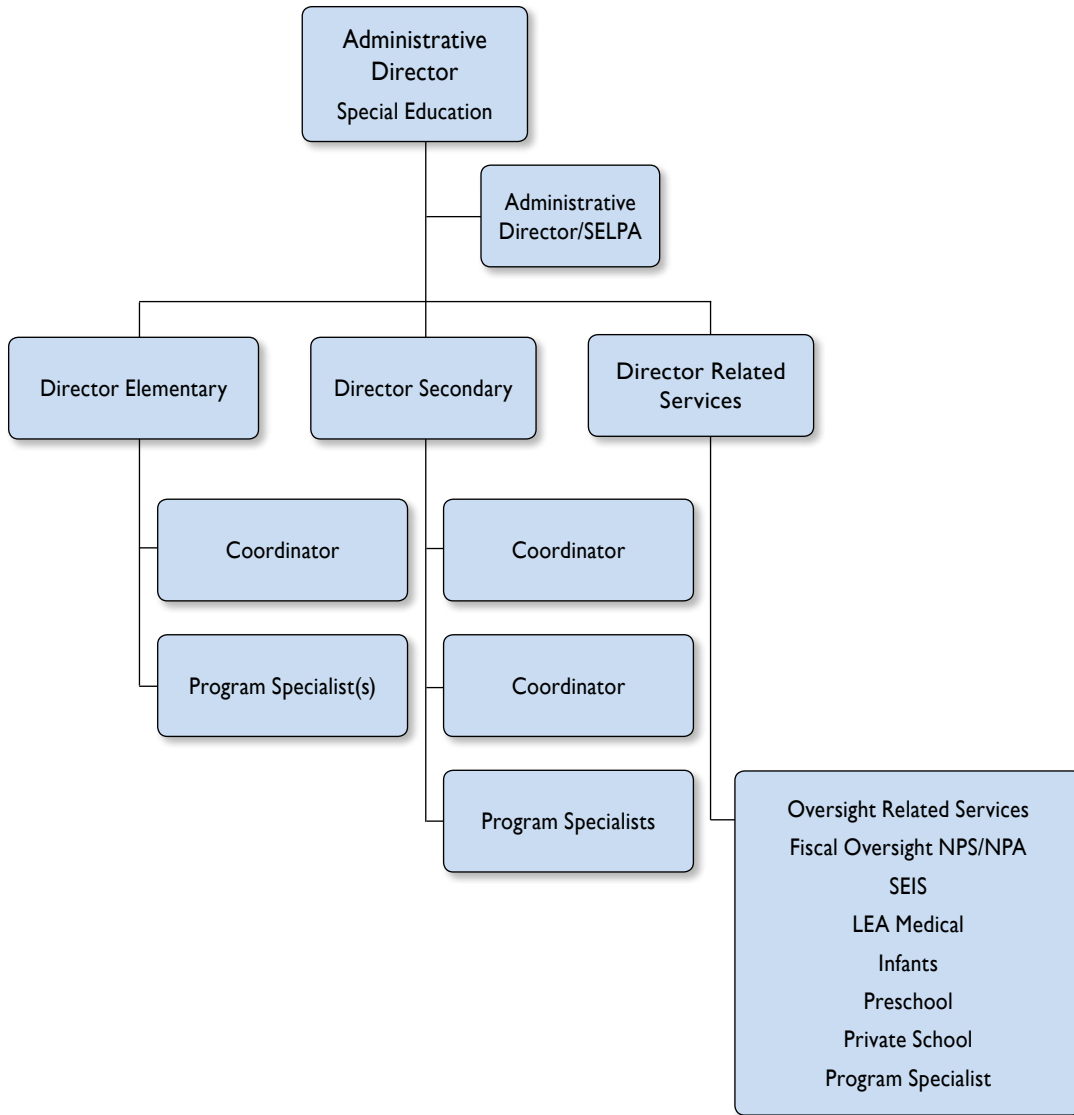
The assignments between coordinators and supervisor are not equitable. Each position has responsibilities for specific programs and services, which is appropriate; however, one coordinator is also assigned with sole oversight responsibility for an additional 15 school sites, school psychologists, mental health services, and preschool and infant services. These assignments need to be balanced to allow each administrator to carry out specific program oversight duties for autism, infants and preschool and emotional disturbance.

Staff indicate that the department perceives its role as reactive rather than proactive. FCMAT found a lack of systems and protocols, which delays the reaction time for resolving issues. For example, paraeducators do not get timely notification at the end of the year of their assignment for the next year. It is unclear which department is responsible for this notification. When paraeducators call human resources, they are referred to special education and vice versa.

The administrative structure needs revision and should be streamlined to achieve greater efficiency and alignment of administrative duties similar to comparable districts before appropriate systems and protocols can be implemented. This may require some shifting and changes in the leadership positions of the special education office. It also involves adding another director and eliminating the supervisor position. This keeps increases in staffing costs at a minimum.

The district has one open director position. This gives the current staff of coordinators and supervisor the opportunity to apply for a promotional position if they meet the requirements.

Other configurations used by comparable districts may be more productive. The following example offers a more streamlined approach to the support for special education programs and services. The sequence of elementary and secondary directors allows for direct focus and support for school site programs, staffing and principals.



Classified Support Positions

The disparate classified staffing figures from San Bernardino City prevent the calculation of an average between districts. The lack of response from Capistrano Unified also prevents the calculation of a reliable average for classified staffing.

Classified Support Positions in Comparable Districts

Titles	Corona-Norco	Capistrano	San Bernardino City	Santa Ana
Secretary		District did not respond	6	
Secretary I	2		1	
Secretary III			1	
Senior Secretary				2
Admin. Clerk				2
Bilingual Secretary			1	
Bilingual Secretary III			.2	
Executive Assistant				1
Clerk I			3	
Clerk II/ Office Assistant III	7		9.6	1
Account Clerk II/ Budget Technician II/ Account Analyst	1		2	
Records Technician/ CASEMIS Data Processing Assistant/ Microcomputer Specialist	2		1	1
Registrar/Records Pre-K	1			
Community Assistant/ Community Resource Worker	1		.75	
Translators			1	6
Total	16		26.55	13

Source: Data provided by individual districts

Functionality

The functions of classified support positions in each district reported are consistent and cover similar duties and responsibilities in the comparable single district SELPAs. The district's clerical support has clearly defined assignments; however, staff interviews indicate a lack of cross training on department duties. The department lacks a systematic method for managing the workflow of this large administrative office. FCMAT found that comparable districts have a director's secretary who, in addition to other duties, is directly responsible for the office workflow.

The duties of the registrar/records maintenance position deals primarily with preschool and do not align with the job title or description. This preschool clerical support is needed but the job title should be reviewed.

Recommendations

The district should:

1. Identify a current clerical support position to be responsible for the special education office workflow.
2. Support the necessary cross training of Special Education Department clerical staff to ensure balanced workflow and overall efficiency.
3. Provide opportunities for Special Education Department clerical staff to meet with department administrators to problem-solve and troubleshoot areas where administrative support is needed to accomplish assigned tasks.
4. Provide opportunities for key clerical staff that overlap with the Business and Human Resources departments to meet and develop protocols to increase effectiveness between departments.
5. Analyze the duties of the registrar/records maintenance position and determine if there is a need to adjust or change the job description to meet current needs.
6. Consider adding 1 FTE clerical support for the administrative director of special education. If added, this position would also be responsible for the special education office workflow.
7. Consider analyzing the duties of the administrative director of special education and reassigning oversight of the eight school sites and supervision of related services to allow this position to focus on the broader aspects of leadership in the department. These include program development, procedures and protocols to build internal capacity and efficiency, fiscal oversight and due process.
8. Closely examine the duties of each administrator of the department and ensure that there is no duplication of duties.
9. Consider reconfiguring the organizational structure to provide for a director of elementary and director of secondary programs positions, each with responsibility for programs and services in school sites using a combined system of coordinators and program specialists to support schools and staff.
10. Evaluate the supervisor position and its job description and determine if the resource may be used differently and more efficiently. Consider re-evaluating resources in the existing administrative allocation to create a third director to assume duties unrelated to the direction of school programs. This would allow the directors of elementary and secondary to focus on schools and program support.
11. Evaluate the workload of the coordinator of preschool, infants, mental health, private schools and psychologists, and implement necessary adjustments.

Special Education Transportation

Transportation Safety and Service

The district contracts for transportation through First Student Transportation Services, and the district transportation staff coordinates this support. The district enjoys a strong business partnership with First Student, which is directly managed by the district Transportation Department.

District transportation staff struggled in coordinating transportation for special education students during the start of the 2017-18 school year. Initial service complaints were logged and noted by district leadership. The complaints generally centered on the following:

- Lack of timely student data received by transportation staff from the Special Education Department
- Changing student information
- Inaccurate student program site assignment

A September 2017 school start-up transportation debrief indicated that student data changes received from the special education staff affected approximately 21% of all special education students routed for school start. In many cases, students were affected by several routing updates.

District data indicates that after the transportation staff performed initial special education routing for the 2017-18 school start, the routing staff received 110 requests to add new students, 50 requests to drop students, 35 address updates, 30 program site changes and 27 changes for student pick-up and drop-off locations. This frustrated students and parents and resulted in highly inaccurate routing.

Interviews indicate that district and contractor staffs worked hours of overtime and weekends to correct the routing errors. The problems were caused by several factors, the largest being the lack of timely receipt of accurate student data from the special education staff to the district's transportation staff before the end of the prior summer recess. Several district staff members have access and can generate the data needed for transportation service through the IEP process. Staff report that case managers sometimes may not submit the transportation request data until after they return from summer recess. Transferring student data from the SEIS to a district electronic data format for transportation services may also allow for errors. The staffs of the district's Special Education and Transportation departments have worked to transition the transportation request data from a manual to an electronic format. However, the district should develop a committee of those affected, including district leadership, to continue to improve its internal processes for maintaining the special education student data for transportation.

California regulations require all school buses to receive a full inspection from the California Highway Patrol (CHP) Motor Carrier Safety Unit. Any problems must be repaired before placing the vehicle back into service. First Student submits to an annual inspection by the CHP commonly known as the terminal grade inspection and consistently receives CHP's highest grade of "satisfactory." The CHP Motor Carrier inspects all buses, vehicle maintenance records, driver on-duty records and driver drug and alcohol testing records. A satisfactory grade means that the contractor complies with the laws and regulations governing safe school transportation. The grade indicates that the transportation services the district receives are considered safe.

EC 39831.3 requires each district to have at each of its schools a transportation safety plan that is subject to inspection by the CHP. The district has an updated transportation safety plan; however, it is unknown if a copy of the plan is located at each site.

EC 39831.5 requires transportation safety information to be taught and evacuation procedures and drills conducted for all K-8 students who receive home-to-school and special education transportation. District documentation indicates the district complies with this statute.

Recommendations

The district should:

1. Continue to review internal processes for maintaining the special education student data required for transportation by forming a district committee of those affected including leadership to ensure that obstacles to timely and accurate data are resolved.
2. Consider limiting access of the number of staff who can generate an internal electronic IEP transportation request to trained personnel who can ensure timely and accurate information is obtained from the IEP for transportation.
3. Ensure that the transportation safety plan is located at each district school site and is available to CHP upon request.

Transportation Department Funding and Finance

School transportation is one of most underfunded areas of the state's education budget. Before 1977, it was fully funded. School districts would report their operational costs and receive full reimbursement in the subsequent school year. With the adoption of Proposition 13, the state began reducing the percentage of reimbursement, and by the 1982-83 school year, districts were receiving only 80% of their reported costs. That year, the state capped the reimbursement at the level of costs districts reported, only occasionally granting a cost-of-living adjustment. Over the past 34 years, costs have risen significantly, demographics have changed and the need for special education transportation has significantly increased. However, the amount each school district receives decreased by approximately 20% from 2008 through the 2012-13 school year.

In the 2013-14 school year, California adopted the LCFF, and school transportation has been funded at the same level as the prior year appropriation. In addition, the funding was structured as an add-on to the base grant received by each district. It can be utilized only on school transportation, and districts need to spend at least as much as they receive to maintain the same level of funding. On a statewide average basis, California provides approximately 35% of the funding necessary for school transportation based on school districts' reported approved costs.

Starting with the 2014-15 budget cycle, related costs for student transportation were not tracked under the SACS resource codes of 7230 for home-to-school service and 7240 for severe disability/orthopedic impairment (SD/OI). In addition, the state no longer requires districts to specifically report transportation data or fill out and submit the state TRAN report. However, most county offices of education suggest that transportation costs continue to be separated for home-to-school and SD/OI with county office generated resource codes.

The district received \$1,718,814 in state funding for transportation prior to the implementation of the LCFF; \$1,000,086 for home-to-school general education transportation and \$718,728 for SD/OI students. Although the funding amounts have remained the same, they are no longer

subject to strict rules regarding usage for home-to-school or SD/OI. The district budget indicates state revenue for special education transportation is \$718,728. The 2016-17 actual expenditure for special education transportation was \$10,059,245. The 2017-18 budget for special education transportation expenditures is \$10,167,009. The state funding covers approximately 7.1% of the district's special education cost for 2016-17 and is projected to cover approximately the same for 2017-18.

The current contract provider, First Student, charges the following for special education transportation support:

- 20 passenger bus: \$274.24 for a 4-hour base rate, \$320.34 for a 6-hour base rate and \$29.91 for each additional hour of service
- 0-4 wheelchair bus: \$290.77 for a 4-hour base rate, \$316.03 for a 6-hour base rate and \$29.91 for each additional hour of service

District budget documents indicate that the contractor currently transports approximately 1,347 students at an annual cost of \$9,765,833 or approximately \$7,250 per student.

The contracted rates above are competitive and reflect some of the lowest FCMAT has recently identified in other southern California school districts. The competitive rate structure is most likely the result of two factors; the length of time the district has had an ongoing contract with First Student and the fact that the district owns the land and facilities used by the contractor for office space, vehicle maintenance and to park part of the bus fleet. The district's special education routes and possibly general education routes will grow with increased student enrollment as it continues to expand into undeveloped areas.

Approximately 34 district special education students receive transportation from four other sources: American Logistics, Child Shuttle, parent in-lieu contracts and NPS contracts. During 2016-17, the district spent the following approximate amounts in the four additional areas of special education transportation:

- American Logistics: \$93,350. The district anticipates transporting seven students for the 2017-18 school year at an estimated \$19,597 per student per year, or \$137,179 total.
- Child Shuttle: \$97,594. The district anticipates transporting four students for the 2017-18 school year estimated at \$16,875 per student per year, or \$67,500 total.
- Parent in-lieu contracts: two parents received transportation reimbursements, one for \$15,392 and the other for \$17,839. Both contracts appear excessive based on 180 contract days. For example, one parent's calculation suggested 160 miles charged per day for an approximate cost to the district of \$85.51 per day. A third parent was reported as transporting at his or her own expense.
- NPS contracts: 20 students were reportedly transported under NPS contracts at an average cost of \$20,174.93 with the highest being the Beacon Day School at approximately \$42,735 per student per year, and the lowest Oak Grove at the Ranch costing the district approximately \$9,518 per student per year.

The district's contract with First Student was originally bid in 1986 and has not been competitively rebid since then. The current bid has been continuously renewed for five-year terms consecutively. The district plans to solicit vendors and will go out for competitive bids at the end of the current contract term. The current bid pricing is extremely competitive, in part because the district can provide both fleet parking space and facility operations space. Bidding the service will

most likely result in a significant price increase, but as a public entity, the district should adhere to public procurement and competitive bid practices.

The district believes that owning fleet and operational facilities helps keep contract costs low. It should highlight the fleet parking and operations facilities benefit in future contract solicitations as a major attraction for transportation providers. The district also maintains control and greatest efficiency of its special education bus routes by having its transportation personnel prepare all routing. This is a highly recommended practice for all districts with external pupil transportation contracts.

First Student also leases two additional fleet parking areas in the city of Norco for the necessary number of school buses. The district pays approximately \$165,000 annually to First Student for the cost of these locations. It is difficult for the contractor to effectively manage and communicate with its employees who are assigned to buses at the two auxiliary locations, which do not have operational facilities to house supervisors. The district may have an opportunity to purchase a parcel of land adjacent to the district's operations facility.

The district owns and maintains the primary transportation fleet and operations facility, which First Student uses to support the district contract. The district charges First Student for the utility costs of this facility. The district also maintains the fueling infrastructure, manages the supply of unleaded fuel and charges First Student for the product it uses. First Student manages all diesel fuel purchases. This facilities-use arrangement is another reason for the lower cost of the First Student contract; however, some district expenses are not quantified. This includes insurance and maintenance as well as local and county hazardous waste and storm water management of the property. In addition, the office space at the operations facility is cramped and in need of expansion that accommodates the growth in district transportation support.

The district maintains an office facility area and employs a transportation staff that performs general and special education routing and coordinates field trips. District transportation staff also manage the parent fee program for general education transportation. A review of the district's transportation budget, found that the internal transportation cost is unevenly divided between special education and general education expenses. The costs for both transportation programs are identified below:

General Education Transportation Cost (district transportation office support):

- Salaries: \$216,138
- Benefits: \$66,834
- Office Supplies: \$6,533
- Travel & Conference: \$1,592
- Postage & Mail: \$1,231
- Other Services: \$982
- Special Education Transportation Cost (district transportation office support):
- Salaries: \$122,721
- Benefits: \$33,939
- Office Supplies: \$2,077
- Software Licenses & Support: \$8,552

- Travel & Conference: \$2,480
- Copier Repair: \$245
- Postage & Mail: \$3,117
- Printing: \$1,208

The total district transportation office support for 2016-17 was \$467,649. The individual program amounts appear unevenly weighted on the general education transportation budget. However, the district may have intentionally chosen to weight the budget because parent participation fees are charged on general education transportation, and additional staffing is required to support this.

Recommendations

The district should:

1. Continue to provide facility space for their pupil transportation needs in future contracts.
2. Consider the possibilities of increasing land space for fleet parking to allow the transportation contractor to cease use of two lot facilities being leased elsewhere in the district.
3. Analyze the amount spent in all four additional contract areas (American Logistics, Child Shuttle, NPS and parent in-lieu) to determine if the district could further reduce cost by moving student transportation over to the contract provider, First Student.
4. Establish a practice of competitively bidding service for pupil transportation support at five-year intervals or earlier as needed.
5. Ensure assessing all costs associated with the provision of facilities space as a means of measuring future transportation contract discounts with bidding for service. This would include costs such as insurance and maintenance.

Routing and Scheduling

The district's internal transportation program staff perform all routing and scheduling, and the information is provided to First Student. The contractor transports approximately 1,347 students with IEPs. District staff has designed 159 bus routes, 40 with wheelchair accessibility. The 2016-17 total cost charged by First Student was \$9,765,833, representing a per-student cost of \$7,250. The district has an approximate ratio of 8.5 students per route, just slightly under the average ratio of 10 students per route in districts most recently observed by FCMAT. American Logistics Company (ALC), Child Shuttle, NPS contractors and parents with in-lieu contracts transport an additional 34 students. Twenty-one percent of the district's special education students require transportation as a necessary related service. This is high compared to other districts FCMAT has observed statewide, indicating an overidentification of students. Over the past five years, the district has added 30 special education bus routes, a significant increase. It should ensure that the IEP teams are trained to appropriately assess the need for student transportation using a chart known as a "decision tree" for consistency. A sample is attached as appendix B to this report.

Individual teachers are student IEP case managers and enter information into SEIS. For new students a “transportation survey,” the district term given for a student transportation request, is electronically transmitted. The teacher or case manager completes and transmits the request; the electronic submission is not a part of SEIS, but a separate electronic transmission. This model lends itself to potential overidentification of students because teachers may be less sensitized to the cost of services and may not be appropriately trained to identify transportation as a specific related service based strictly on the student’s special need or program location. Numerous case managers decide to grant transportation. FCMAT was not provided with information indicating consistent criteria is used to ensure least restrictive environment and related need. The district should consider assigning the special education program specialists to review all recommended transportation requests. This will promote better consistency of evaluation and ensure that recommended services are in the least restrictive environment. Program specialists or administrators trained in identification can also help ensure that eligibility is more aligned with how the district provides transportation for its general education population.

The district has approximately 63 bus monitors or aides assigned to bus routes operated by First Student. No specific contract section permits the assignment of bus monitors. Additional aides or paraeducators are generally assigned for health-related matters or assigned through the IEP process for specific students and are employed through the district’s Special Education Department. Thirty-nine percent of the bus routes have aides, an extremely high percentage. FCMAT usually observes an aide ratio of approximately 10% of total bus routes. The high percentage of aides on routes could indicate that bus drivers are poorly equipped or trained for the needs of special education students. Transportation staff participate in some IEP meetings; however, they may not be utilized as often as necessary in IEP meetings, where difficult placements involve transportation support.

Many students eligible for Extended School Year (ESY) register for summer school, but decide not to attend. District staff report that they do not reduce ESY routing because they have insufficient time, but this results in excessive costs for ESY transportation support since up to 40% of ESY students decide not to attend.

The district owns and operates two wheelchair accessible vans, as well as other vehicles for student transportation. It is unclear how many are used for special education students; however, some are utilized for transition/workability and community-based instruction programs during the instructional day. Although FCMAT did not perform an in-depth analysis of the district’s vehicle maintenance program, staff indicated the district uses external repair contractors and outsources vehicle repair and maintenance. Routine preventive maintenance appears to be according to time intervals or once annually, and the district apparently does not have a maintenance program based on accumulated mileage. Vehicle repairs simply are scheduled when the district operator has a vehicle operation concern or the vehicle malfunctions.

District staff attempt to limit special education student ride time to one hour. At the beginning of the 2017-18 school year, 252 routing inaccuracies resulted in an extended period of correction. Staff report that the current school year start-up had many more problems than a normal start-up with the information for approximately 18% of students being incorrect. This could result in critical safety issues such as dropping students off at the wrong schools or arriving at the wrong home addresses, hindering a student’s ability to access his or her education. Staff indicated that the district obtained more accurate student information in years past by using a parent verification letter to verify pertinent information. During the 2016-17 school year, there was also more communication and participation with the records technicians, resulting in fewer students having incorrect information compared to the 2017-18 school year.

The district transportation program staff do not monitor First Student's two-way radio communications among their drivers. Although staff report effective communication between the First Student and district transportation offices, district transportation staff sometimes receive calls from parents who want to discuss an issue staff know nothing about.

The district utilizes an industry standard electronic routing system named Edulog that has served it well for many years, but may be limited in some areas because it is an older version. The district may be required to upgrade the software once Edulog no longer supports its older version. The transportation program is large and the staff needs the capability to route efficiently, optimize routes and employ routing options for proposed bell schedule changes, school boundary adjustments and expansion.

The district's master bell schedule does not permit optimum bus route efficiency. The special education transportation delivery model requires 159 bus routes, 54 of which are less than four hours long. First Student charges a minimum of four hours as indicated in its contract. The district cannot achieve more than one bus run on 54 of its routes, causing a significant loss in efficiency and resulting in additional cost. Several bus routes are less than 2.5 hours long. This represents a significant cost to the district. District transportation personnel historically played a significant role in developing the master bell schedule as well as selecting special education program facility locations, allowing for the maximization of the district's transportation resources. Currently, the transportation staff are only minimally involved planning master bell schedule start and end times. A large unified school district such as Corona-Norco could significantly benefit from initiating a three-tiered master start/end bell schedule through a regional approach based on transportation route travel times and traffic patterns. This would allow one bus to pick up students on a first route and drop them off, then proceed to a second route for pick up and drop off at a school with a later start time, and then finish up with a third route for pick up and drop off at a school with an even later start time.

Recommendations

The district should:

1. Ensure IEP teams are trained to appropriately assess the need for student transportation as a necessary related service using a decision tree for consistency in evaluating the need for service.
2. Review and/or revise the decision tree to identify special education students for transportation as a necessary related service.
3. Consider consolidating the decision makers through the IEP process for determining transportation support, or ensure that program specialists or administrators are present for the IEP when a new special education student enters the district, and when students transition to another school (e.g. elementary to middle school and middle school to high school).
4. Evaluate the high percentage of bus monitors and aides on special education routes to reduce the overall number of aides through increased staff training in behavior support.

5. Increase the participation of district transportation staff in necessary IEP meetings to appropriately identify transportation support and ensure that it is applied in the LRE.
6. Implement a strategy to communicate with parents as to whether their student(s) will attend ESY and whether they wish to participate in transportation services if they are identified for such.
7. Immediately begin collapsing summer routing one week after ESY starts to ensure the greatest route efficiency and cost savings.
8. Consider a more stringent maintenance plan for vehicles used to transport students.
9. Enhance the communication and data exchange between the special education and transportation programs to ensure accurate and timely student information data for safe transportation scheduling.
10. Consider assigning the records technician to verify the information on the transportation survey and the spreadsheets used at the beginning of the school year before sending it to the Transportation Department staff for scheduling.
11. Consider requiring two-way radio monitoring of the contractor's daily operation.
12. Evaluate the current electronic routing software and compare it with several other choices available in the industry.
13. Assess the master bell schedule, allowing transportation staff to suggest a tiered bell version with staggered school start/end times.

Suggestions for Future Transportation Contract

The district plans to initiate competitive bids for the transportation contract provider at the end of the current contract term, ending in the 2018-19 school year. The current contract was originally competitively bid for a five-year term in 1986, and the district has renewed the bid every five years with that contractor. The district referenced EC 39803 as allowing them to continuously renew the contract. This code section permits a district to bid for service with an original term of five years and allows the agreement to be extended for an additional five years; however, it does not specifically allow for continual rollover beyond a 10-year term. The section also requires all terms and conditions of the original agreement to be included in the renewal and specifically, any increased rates. The district appears to have negotiated annual increases separately.

The district should consider several elements as it begins the formal bid process for transportation services. The contract with First Student has a weak liquidated damages section that permits the district to apply these only if the contractor falls below the stipulated 10% spare factor of buses or the 5% spare factor for drivers. The contract also relieves the contractor of the current liquidated damages if the district changes the estimated number of bus routes at the beginning of the year (relieved for 40 school days), and any time during a school year (relieved for 30 school days). This language is uncommon in similar pupil transportation contracts FCMAT has reviewed because the language does not allow the district to ensure a sufficient spare bus factor and substitute drivers. Transportation contracts typically include provisions allowing the district to

apply liquidated damages when bus routes run 15 minutes late or more or when a route segment is missed altogether. District staff indicated they permit the contractor to double up on a route when necessary to cover driver absences and that they do not apply liquidated damages in these situations or when a route or bus run on a route are missed.

The district reported that the contractor assigns bus monitors to specific bus routes. Although the practice may have merit when the district agrees to the assignments, the current contract does not have a provision allowing the contractor to do this.

The contract is unclear about the district's right to have a driver or monitor removed. One clause discusses a driver's "moral character" (section 21.3); however, it does not provide any definition for such or allow the district to have a driver removed for not following the provisions of this clause, which could be problematic.

The district's contract also prohibits the contractor from operating small buses (Type II) that are more than 11 years old, transit buses (Type I) more than 18 years old and conventional-type buses older than 15 years. The district confirmed that it waived this requirement to secure a more competitive price quote at the time of the most recent contract renewal. Presumably, the district would now require newer buses at the time of the rebid, which will increase the cost of a new contract. The South Coast Air Pollution Control District (SCAPCD) will not allow diesel buses, so cleaner technology will most likely result in additional increased costs as well.

District staff expressed an interest in placing video surveillance and global positioning systems (GPS) in all district buses operated by the contractor included in future contracts. Both items have become standardized equipment and are common in many school bus fleets. Both technologies can also be effective in monitoring contract compliance and student behavior. However, the added technology requirements will most likely increase costs.

FCMAT estimates that the district should expect a contract increase of approximately 20% when it awards a new transportation contract.

Recommendations

The district should:

1. Rebid transportation services every five years and consider exercising an option to renew the contract for up to five additional years based on the terms of the existing contract for fee increases.
2. Apply liquidated damages per the contract language.
3. Evaluate the benefit of having the contractor institute bus monitors when mutually agreed upon.
4. Ensure future contract language gives the district the ability to remove a driver at its discretion and request based on reasonable concerns and complaints about driving or student safety.
5. Explore the benefits of requiring video surveillance and GPS in its next contract to determine any student management benefits and potential operational savings related to future litigation.

Staffing

The district's transportation program staffing consists of the following:

- 1 FTE Director of Transportation
- 1 FTE Transportation Planning Specialist
- 1 FTE Transportation Scheduler
- 2 part-time substitute clerks (each work approximately July-October, April-June; 7 months per year. These positions have been regularly budgeted for the past three years.)

Before the last recession, the district transportation program was staffed as follows:

- 1 FTE Director of Transportation
- 1 FTE Transportation Planning Specialist
- 1 FTE Transportation Scheduler
- 1 FTE Transportation Secretary
- 1 FTE Transportation Clerk
- 1 Part-Time Transportation Clerk

The district's transportation program responsibilities have increased over the last five years. Approximately 30 special education routes have been added. The district has also implemented student participation fees for the general education ridership. The transportation staff prepares routing for the summer ESY special education routes. Approximately 40% of identified students historically have chosen not to attend or participate in transportation services for the ESY program; however, district staff report that they don't have sufficient staff to adjust routes to reflect reductions. These reductions could result in savings to the district.

The department provides scheduling of special education and regular education routes, schedules all district activity and athletic trips, handles phone complaints, processes all bus passes, maintains DMV employee pull notices for all district staff who drive support vehicles and for those who have a Commercial Class B license to meet their district position description requirements. With increased staffing, the district's Transportation Department could assign special education students to First Student who are currently assigned to other external contract providers. The additional positions could also allow the transportation staff to effect immediate reductions to ESY routing in the event of student nonattendance.

Recommendation

The district should:

1. Increase staffing by one FTE transportation scheduler and one part-time clerical support position employed for 10 months annually to be scheduled during times of greatest need.

Appendices

- A. **Sample Occupational Therapist Job Description**
- B. **Sample Decision Tree for Transportation as a Related Service**
- C. **Study Agreement**

Appendix A- Sample Occupational Therapist Job Description



Occupational Therapist

Bargaining Unit: Office, Technical, Business
Services, and Paraprofessional

Class Code:
1029

POWAY UNIFIED SCHOOL DISTRICT
Revision Date: Aug 1, 2016

SALARY RANGE

\$35.75 - \$45.78 Hourly

BASIC FUNCTION:

BASIC FUNCTION:

Under direction, provides educationally related occupational therapy services to students with various disabilities in accordance with the student's Individualized Education Plan (IEP).

DISTINGUISHING CHARACTERISTICS:

An employee in this class collaborates as a member of the educational team and is expected to handle a variety of assignments that relate to individual students' specialized needs and related disabilities. They are expected to work independently with the students on a one-to-one basis or in a group setting. The Occupational Therapist has a broad scope of evaluative tasks in the development, planning and assessment of therapy programs. The Certified Occupational Therapy Assistant works with the Occupational Therapist and other staff as appropriate in developing and providing services and activities suitable for individual student capabilities toward improvement of the student's academic achievement.

REPRESENTATIVE DUTIES:

Assesses students' abilities and performance in activities that are related to the curriculum and applicable to activities of daily living. *E*

Identifies and documents students' educational/developmental/functional needs with the IEP team. *E*

Develops, coordinates and implements individual occupational therapy intervention plans that support the IEP goals and objectives. *E*

Designs, plans and executes group occupational therapy plans which support the specialized instructional setting. *E*

Assists with the development of students' transition plans, programs and goals. *E*

Records assessments, actions taken and recommendations made regarding areas of service as required by law, board policies, administrative regulations and the Special Education Department. *E*

Schedules, plans and provides occupational therapy programs for students with physical limitations, orthopedic impairments and/or other areas of concern for the purpose of aiding the students' physical rehabilitation in accordance with IEP goals. *E*

Recommends, designs and creates adaptive equipment. *E*

Trains and serves as a consultant to program staff in areas such as sensory motor, sensory stimulation and body awareness, fine motor and gross motor skills and other areas within the therapist's area of expertise. *E*

Demonstrates appropriate activities for students to program staff. *E*

Provides consultative services to parents, students, teachers and program staff in implementing the student's IEP. *E*

Responds to inquiries and concerns which arise from parents, students, teachers and staff. *E*

Perform related duties as assigned.

NOTE: At the end of some of the duty statements, there is an "E" which identifies essential duties required of the classification.

KNOWLEDGES AND ABILITIES:

KNOWLEDGE OF:

Child development, neuromuscular function/dysfunction, sensory motor integration, kinesiology, skeletal anatomy and basic pathology related to orthopedic disabilities.

Individual and group occupational therapy techniques commonly used for students with special needs.

Principles, methods and equipment used in occupational therapy.

Educational and medical applications of adaptive equipment.

Generally accepted standards of health and sanitation.

Case management principles.

Record keeping practices and procedures.

ABILITY TO:

Develop, plan and implement an educationally related occupational therapy program for students with various disabilities.

Assess individual students and develop appropriate intervention which includes goals/objectives of IEP team.

Explain and provide training on occupational therapy and how educational assistance is provided.

Provide consultation to general and special education staff, parents and students.

Establish and maintain effective working relationships with parents, students, staff and community agencies.

Plan and organize work.

Maintain accurate records and files.

Work confidentially with discretion.

MINIMUM QUALIFICATIONS:

Any combination of education and experience equivalent to: graduation from an occupational therapy curriculum accredited jointly by the Council on Medical Education of the American Medical Association and the American Occupational Therapy Association and registration by the American Occupational Therapy Association certifying clinical competence as a Registered Occupational Therapist. Experience working with students with a variety of disabilities and in an educational setting is preferred.

OTHER NECESSARY REQUIREMENTS:

A valid license by the California Board of Occupational Therapy is required.

A valid Class C, California driver's license, a driving record that meets district insurability requirements, and use of a personal vehicle is required.

Valid certifications provided by American Heart Association, American Red Cross or District approved provider for Adult/Child CPR and AED. Online certifications will be accepted from these vendors as long as a hands-on skills assessment is completed. Recertification to maintain current/valid status is a condition of employment.

WORKING CONDITIONS:**ENVIRONMENT:**

Indoor and outdoor school work environment and office setting.

PHYSICAL DEMANDS:

Strength to lift and/or carry up to 25 pounds and occasionally lift and/or carry up to 40 pounds.

Seeing to monitor activities.

Good speaking and hearing abilities.

Ability to bend, stoop, kneel or sit on floor for extended periods while assisting students in therapy.

Ability to stand for extended periods.

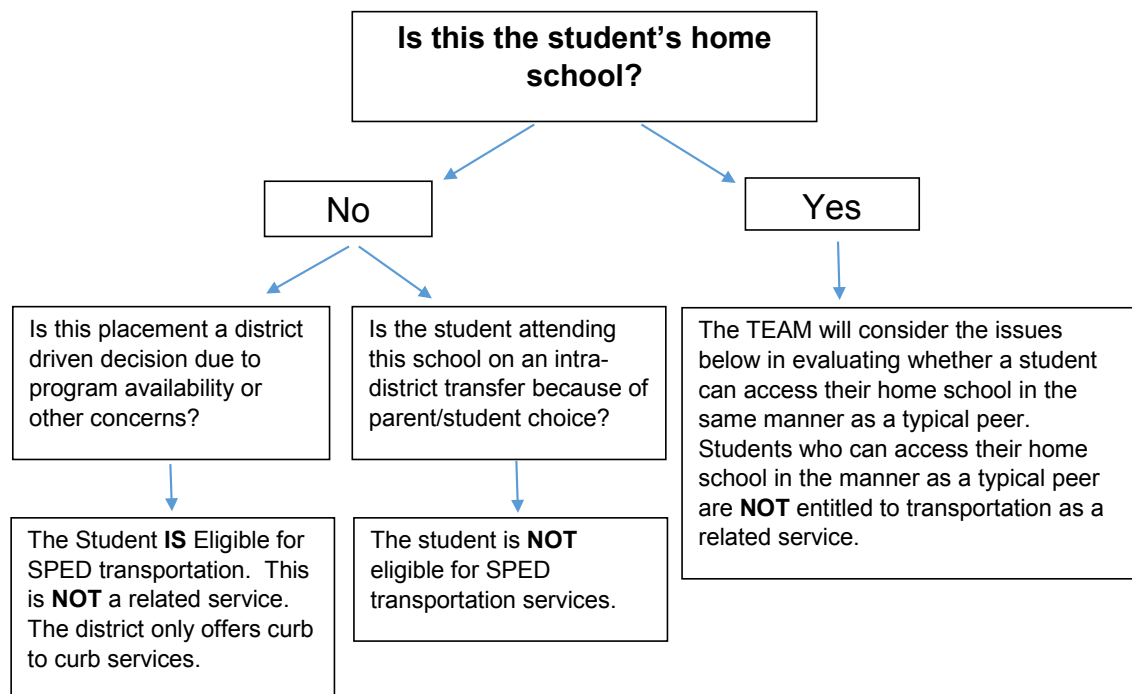
Hand and eye coordination skills.

Hand dexterity for use of manipulative equipment, etc

Appendix B- Sample Decision Tree for Transportation as a Related Service



Consideration for Transportation Services



Appendix C- Study Agreement



CSIS California School Information Services

**FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
June 20, 2017**

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

1. BASIS OF AGREEMENT

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

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

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

1. Review the district's implementation of Student Success Team, Response to Intervention, and Multi-Tiered System of Supports, and make recommendations for improvement, if any.
2. Analyze special education teacher staffing ratios, class and caseload size using statutory requirements for mandated services and statewide guidelines and make recommendations for improvement, if any.
3. Review the efficiency of staffing allocations of special education paraeducators, per education code requirements and/or industry standards and make recommendations for improvement, if any. Review the procedures for identifying the need for paraeducators, including least restrictive environment and the processes for monitoring the assignment of

paraeducators and determining the ongoing need for continued support from year to year. (Include classroom and 1:1 paraeducators.)

4. Analyze staffing and caseloads for related service providers, including but not limited to: speech pathologists, psychologists, occupational/physical therapists, behavior specialists, adaptive physical education and other staff who may related service providers, and make recommendations for improvement, if any.
5. Determine whether the district overidentifies students for special education services compared to the statewide average, and make recommendations that will reduce overidentification, if needed.
6. Analyze whether the district provides a continuum of special education and related services for students from preschool through age 22, including placements in the least restrictive environments, and make recommendations for improvement, if any.
7. Review COE, NPS and NPA costs and placements and make recommendations for improving the process for placement and cost efficiencies, if any.
8. Review the organizational structure and staffing of the special education department in the district's central office to determine whether administration, clerical and administrative support, program specialists, teachers on special assignments and overall functionality are aligned with those of districts of comparable size and structure and make recommendations for greater efficiencies, if needed.
9. Review the special education transportation delivery system for efficiency and effectiveness, and provide recommendations for potential cost savings measures, if any. The review will include but not be limited to the role of the IEP, routing, scheduling, operations and staffing.
10. Review the costs of due process, mediations, and settlements for the past three years and make recommendations for improvements, if any.
11. Review the district's unrestricted general fund contribution to special education and make recommendations for greater efficiency, if any.

B. Services and Products to be Provided

1. **Orientation Meeting** - The team will conduct an orientation session at the district to brief district management and supervisory personnel on the team's procedures and the purpose and schedule of the study.

2. On-site Review - The team will conduct an on-site review at the district office and at school sites if necessary.
3. Exit Meeting - The team will hold an exit meeting at the conclusion of the on-site review to inform the district of significant findings and recommendations to that point.
4. Exit Letter – Approximately 10 days after the exit meeting, the team will issue an exit letter briefly memorializing the topics discussed in the exit meeting.
5. Draft Report - Electronic copies of a preliminary draft report will be delivered to the district’s administration for review and comment.
6. Final Report - Electronic copies of the final report will be delivered to the district’s administration and to the county superintendent following completion of the review. Printed copies are available from FCMAT upon request.
7. Follow-Up Support – If requested by the district within six to 12 months after completion of the study, FCMAT will return to the district at no cost to assess the district’s progress in implementing the recommendations included in the report. Progress in implementing the recommendations will be documented to the district in a FCMAT management letter. FCMAT will work with the district on a mutually convenient time to return for follow-up support that is no sooner than eight months and no later than 18 months after completion of the study.

3. PROJECT PERSONNEL

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

<i>A. To be determined</i>	<i>FCMAT Staff</i>
<i>B. To be determined</i>	<i>FCMAT Consultant</i>
<i>C. To be determined</i>	<i>FCMAT Consultant</i>
<i>D. To be determined</i>	<i>FCMAT Consultant</i>
<i>E. To be determined</i>	<i>FCMAT Consultant</i>
<i>F. To be determined</i>	<i>FCMAT Consultant</i>
<i>G. To be determined</i>	<i>FCMAT Consultant</i>
<i>H. To be determined</i>	<i>FCMAT Consultant</i>

4. PROJECT COSTS

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

- A. \$650 per day for each staff member while on site, conducting fieldwork at other locations, presenting reports or participating in meetings. The cost of independent

FCMAT consultants will be billed at their actual daily rate for all work performed.

- B. All out-of-pocket expenses, including travel, meals and lodging.
- C. The district will be invoiced at actual costs, with 50% of the estimated cost due following the completion of the on-site review and the remaining amount due upon the district's acceptance of the final report.

Based on the elements noted in section 2A, the total not-to-exceed cost of the study will be \$59,500.

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

Payments for FCMAT's services are payable to Kern County Superintendent of Schools - Administrative Agent located at 1300 17th Street, City Centre, Bakersfield, CA 93301.

5. RESPONSIBILITIES OF THE DISTRICT

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

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

6. PROJECT SCHEDULE

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

Orientation:	to be determined
Staff Interviews:	to be determined
Exit Meeting:	to be determined
Draft Report Submitted:	to be determined
Final Report Submitted:	to be determined
Board Presentation:	to be determined, if requested
Follow-Up Support:	if requested

7. COMMENCEMENT, TERMINATION AND COMPLETION OF WORK

FCMAT will begin work as soon as it has assembled an available and appropriate study team consisting of FCMAT staff and independent consultants, taking into consideration other jobs FCMAT has previously undertaken and assignments from the state. The team will work expeditiously to complete its work and deliver its report, subject to the cooperation of the district and any other parties from which, in the team's judgment, it must obtain information. Once the team has completed its fieldwork, it will proceed to prepare a preliminary draft report and a final report. Prior to completion of fieldwork, the district may terminate its request for service and will be responsible for all costs incurred by FCMAT to the date of termination under Section 4 (Project Costs). If the district does not provide written notice of termination prior to completion of fieldwork, the team will complete its work and deliver its report and the district will be responsible for the full costs. The district understands and agrees that FCMAT is a state agency and all FCMAT reports are published on the FCMAT website and made available to interested parties in state government. In the absence of extraordinary circumstances, FCMAT will not withhold preparation, publication and distribution of a report once fieldwork has been completed, and the district shall not request that it do so.

8. INDEPENDENT CONTRACTOR

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

9. INSURANCE

During the term of this agreement, FCMAT shall maintain liability insurance of not less than \$1 million unless otherwise agreed upon in writing by the district, automobile liability insurance in the amount required under California state law, and workers

compensation as required under California state law. FCMAT shall provide certificates of insurance, with Corona-Norco Unified School District named as additional insured, indicating applicable insurance coverages upon request prior to the commencement of on-site work.

10. **HOLD HARMLESS**

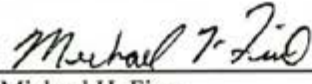
FCMAT shall hold the district, its board, officers, agents and employees harmless from all suits, claims and liabilities resulting from negligent acts or omissions of its board, officers, agents and employees undertaken under this agreement. Conversely, the district shall hold FCMAT, its board, officers,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

11. **CONTACT PERSON**

Name: Dalia Gadelmawla, Administrative Director, Business Services
 Telephone: (951) 736-5025
 E-mail: dalia.gadelmawla@cnusd.k12.ca.us



 Dr. Michael Lin, Superintendent
 Corona-Norco Unified School District
 August 2, 2017
 Date



 Michael H. Fine
 Chief Administrative Officer
 Fiscal Crisis and Management Assistance Team
 June 20, 2017
 Date