FCMAT

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM

Special Education Review

July 23, 2026

Grossmont Union High School District

Michael H. Fine
Chief Executive Officer

FCMAT FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM

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Kirsten Vital Brulte, Ed.D., Superintendent
Grossmont Union High School District
1100 Murray Dr.
El Cajon, CA 92020

Dear Superintendent Vital Brulte:

In December 2025, the Grossmont Union High School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for FCMAT to conduct a review of the district's special education staffing and its unrestricted general fund contribution to the special education program. The agreement stated that FCMAT would perform the following:

1. Analyze special education teacher staffing ratios, class sizes and caseloads using statutory requirements for mandated services and statewide guidelines, and make recommendations for improvement, if any.
2. 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 considerations related to the least restrictive environment and the processes for monitoring the assignment of paraeducators and determining the need for continued support from year to year (including classroom and 1-to-1 paraeducators).
3. Analyze staffing and caseloads for related service providers, including but not limited to speech pathologists, psychologists, occupational/physical therapists, adapted physical education teachers and other staff who may be related service providers, and make recommendations for improvement, if any.
4. Review the Special Education Department's organizational structure and staffing in the district's central office to determine whether its administration, clerical and administrative support, program specialists, teachers on special assignment and overall function are aligned with those of districts of comparable size and structure, and make recommendations for greater efficiencies, if any.
5. Review the district's professional development/training program as it relates to special education, and make recommendations for improvement, if any.
6. 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.

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FCMAT appreciates the opportunity to serve the Grossmont Union High School District and extends its thanks to all the staff for their assistance during fieldwork.

Sincerely,

Michael H. Fine
Chief Executive Officer

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About FCMAT

Purpose and Services

FCMAT was created by the California Legislature to help California's transitional kindergarten through grade 14 (TK-14) local educational agencies (LEAs) avoid fiscal insolvency. Today, FCMAT helps LEAs identify, prevent and resolve financial, management, program, data, and oversight challenges; provides professional learning; produces and provides software, checklists, manuals and other tools; and offers other related school business and data services.

FCMAT may be asked to provide fiscal crisis or management assistance by a school district, charter school, community college, county superintendent of schools, the state superintendent of public instruction, or the Legislature.

When FCMAT is asked for help with management assistance or a fiscal crisis, FCMAT management and staff work closely with the requesting LEA to meet their needs. Often this means conducting a formal study using a FCMAT study team that coordinates with the LEA for on-site fieldwork to evaluate specified operational areas and subsequently produces a written report with findings and recommendations for improvement.

For more immediate needs in a specific area, FCMAT offers short-term technical assistance from a FCMAT staff member with the required expertise.

To help meet the need for qualified chief business officials (CBOs) in LEAs, FCMAT offers four different CBO training and mentoring programs that consist of 11 or 12 diverse two-day training sessions over the course of a full year.

For agencies with professional learning needs, FCMAT offers workshops on specific topics. Popular topics include associated student body operations, use of FCMAT's Projection-Pro online financial forecasting software, use of FCMAT's Local Control Funding Formula (LCFF) Calculator, and data reporting for the California Longitudinal Pupil Achievement Data System (CALPADS). FCMAT staff and management also frequently make presentations at various professional conferences.

The California School Information Services (CSIS) service of FCMAT helps the California Department of Education (CDE) operate CALPADS; helps LEAs learn about CALPADS, resolve data issues and meet reporting requirements; and provides LEAs with training and leadership in data management. CSIS also developed and continues to host and improve the Standardized Account Code Structure (SACS) web-based financial reporting system for all California LEAs, and provides ed-data.org, which gives educators, policymakers, the Legislature, parents and the public quick access to timely and comprehensive data about TK-12 education in California.

Since it was formed, FCMAT has provided LEAs with the types of help described above on more than 2,000 occasions.

FCMAT's administrative agent is the Kern County Superintendent of Schools. FCMAT is led by Michael H. Fine, Chief Executive Officer, and is funded by appropriations in the state budget and modest fees to requesting agencies.

Workshop schedules, manuals, presentation slide decks, Projection-Pro software, LCFF calculators, past reports, an online help desk, and many other resources are available for download or use at no charge on FCMAT's website.

History

FCMAT was created by Assembly Bill 1200 (Chapter 1213, Statutes of 1991) and Education Code 42127.8. Assembly Bill 107 (Chapter 282, Statutes of 1997) added Education Code 49080, which charged FCMAT with responsibility for CSIS and its statewide data management work, and Assembly Bill 1115 (Chapter 78, Statutes of 1999) codified CSIS' mission.

Assembly Bill 1200 created a statewide plan for county offices of education and school districts to work together locally to improve fiscal procedures and accountability standards. Assembly Bill 2756 (Chapter 52, Statutes of 2004) gave FCMAT specific responsibilities for districts that have received emergency state loans.

In January 2006, Senate Bill 430 (Chapter 357, Statutes of 2005) amended Education Code 42127.8, and Assembly Bill 1366 (Chapter 360, Statutes of 2005) amended Education Codes 42127.8 and 84041. These new laws expanded FCMAT's services to include charter schools and community colleges, respectively.

Assembly Bill 1840 (Chapter 426, Statutes of 2018) changed how fiscally insolvent districts are administered once an emergency appropriation has been made, shifting oversight responsibilities from the state to the local county superintendent to be more consistent with the principles of local control, and giving FCMAT new responsibilities associated with the process.

Introduction

Background

Located in San Diego County, the Grossmont Union High School District serves students in grades nine through 12 across 10 high schools. According to DataQuest, 16,368 students were enrolled in 2025-26. The district also provides special education services for students who attend Helix and Steele Canyon high schools, which are charter schools the district authorizes. According to DataQuest, 4,808 students attend these two charter schools.

The district is a member of the East County Special Education Local Plan Area (SELPA). The SELPA is responsible to ensure that a full range of special education programs and services are available to its students. In 2025-26, 19.29% of the district's students were identified as requiring special education (DataQuest).

For its analysis, FCMAT used data from before the 2025-26 second interim reporting period. Before FCMAT's visit, the district had identified a need to align its special education budget with its expenditures and has addressed this need since.

In December 2025, the district and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for FCMAT to conduct a review of the district's special education staffing and its unrestricted general fund contribution to its special education program.

Study and Report Guidelines

FCMAT visited the district on April 15 and 16, 2026, to conduct interviews with central office leaders, special education teachers, related service providers, special education aides, and other staff. Following fieldwork, FCMAT reviewed and analyzed data and documents. This report is the result of those activities.

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 and its own short internal style guide, which emphasize plain language, capitalize relatively few terms, and strive for conciseness, clarity and simplicity.

FCMAT relies on publicly available, authoritative data sources and provides direct links to sources where appropriate; however, sources sometimes differ in the data they provide, or their data may be revised over time due to various factors. FCMAT always strives to use the most accurate data available at the time of reporting.

Study Team

The study team was composed of the following members:

Carolynne Beno, Ed.D.
FCMAT Chief Analyst

Colleen Patterson, MBA, CMA
FCMAT Consultant

Leonel Martínez
FCMAT Technical Writer

Lisa Gilbert, Ed.D.
FCMAT Consultant

All team members reviewed the draft report to confirm accuracy and achieve consensus on the final recommendations.

Executive Summary

Identification for Special Education

According to DataQuest, the Grossmont Union High School District's enrollment has decreased, but special education enrollment has increased over the past five years. During this period, the share of students enrolled in special education increased by 2.54 percentage points. In 2025-26, 19.29% of the district's students were identified as requiring special education (DataQuest), a rate much higher than that of San Diego County and the state.

Special Education Staffing

Central Office

In 2025-26, the district has 3.23 more full time equivalent (FTE) administrator/leadership positions and 11.52 FTE more administrative support positions facilitating the special education program compared to the surveyed school districts.

Special Education Teacher Staffing

In 2025-26, the districtwide education specialist staffing for students with mild-to-moderate support needs who are not in a special day class (SDC) was within the industry standard range. In 2025-26, the districtwide SDC teacher staffing was appropriate given the industry standard range for the following programs: mild-to-moderate support needs SDC, extensive support needs SDC, therapeutic SDC, and autism SDC.

Special Education Instructional Aides

In 2025-26, the districtwide instructional aide staffing for its SDCs for students with extensive support needs is higher than the industry standards. If the district had staffed its SDC program for students with extensive support needs using the industry standard adult-to student ratio, it may have been able to reduce by 70 instructional aides.

In 2025-26, the district has 175 instructional aides who are assigned to provide 1-to-1 student support. While there is no established industry standard for special education instructional assistants providing 1-to-1 student support, in Grossmont Union, 4.67% of the students in its special education program (including students in special education at Helix and Steele Canyon high schools) have a 1-to-1 instructional aide. The last seven districts FCMAT studied had assigned an average of 3.56% of the students in their special education program a 1-to-1 instructional aide.

Related Service Providers

In 2025-26, the district is staffed approximately 1.00 FTE less than the industry standard range for adapted physical education (APE) teachers and approximately 6.00 FTE less than the industry standard range for credentialed school nurses. In 2025-26, the district is staffed approximately 1.00 FTE more than the industry standard range for occupational therapists (OTs). In 2025-26, the district's staffing for speech and language pathologists (SLPs) approximates the Education Code (EC) 56363.3 maximum caseload for SLPs for school-age programs (55 students). Since the students who receive services from an SLP are not neatly distributed into groups of 55 across district schools, having more staffing than is required to meet the EC standard may be necessary. In 2025-26, the district's staffing for school psychologists and vision and orientation and mobility specialists is within the industry standard range.

Unrestricted General Fund Contribution to Special Education

Since 2021-22, costs for salaries, benefits, nonpublic school (NPS) placements, and nonpublic agency (NPA) services have risen significantly, while special education income has not kept pace. In 2024-25, the district's adjusted unrestricted general fund contribution to special education was $65,014,437, or 71.8% of total special education costs. In 2025-26, the district's unrestricted general fund contribution is estimated to be 72.7% of adjusted special education costs.

Findings and Recommendations

Background and Context — Transforming Education to Improve Outcomes for Students with Disabilities

Over the past two decades, educational reform movements emphasizing accountability have highlighted achievement gaps among students based on factors such as race and ethnicity, family income, language ability, and disability. Although California has made some progress in reducing inequities in educational outcomes for these student groups, those with disabilities remain among the lowest-performing subgroups.

In 2013, California convened a statewide special education task force dedicated to ending the persistent poor outcomes for California's students with disabilities, including eligible infants, toddlers, preschoolers, and students up to age 22 in kindergarten through grade 12. The task force's purpose was to study the complex systems designed to serve the students and provide recommendations to the State Board of Education, the Commission on Teacher Credentialing, and the California Department of Education (CDE).

The CDE's project summary for the Statewide Special Education Task Force stated:

> California's current policies, including funding, credentialing, and a range of service delivery options, tend to "bolt on" special education to general education. While there are certainly examples throughout the state of well-integrated models of supports, these are the exceptions rather the norm. Our prevailing model has made it acceptable, and in some instances seem desirable, to isolate special education as a unique and separate system that parallels general education.

The summary further explained that operating special education as a separate program contradicts current research, which shows:

> Inclusive practices, integrated systems, and coherence are essential to provide high-quality, cost-effective special education programs within (rather than apart from) a well-articulated system of education.

In March 2015, the Statewide Special Education Task Force published One System: Reforming Education to Serve All Students, Report of California's Statewide Task Force on Special Education, its report on the state of special education in California. This report identified seven distinct and interconnected areas of focus to improve outcomes for students with disabilities:

1. Early learning.
2. Evidence-based school and classroom practices.
3. Educator preparation and professional learning.
4. Assessment.
5. Accountability.
6. Family and student engagement.
7. Special education financing.

Among the areas of focus and many recommendations in the 2015 report on one system was the predominant theme that California's special education system would improve if one coherent system were designed in which general education and special education work together to meet the needs of all students. The report explained:

> In a coherent system of education, all children and students with disabilities are considered general education students first; and all educators, regardless of which students they are assigned to serve, have a collective responsibility to see that all children receive the education and the supports they need to maximize their development and potential, allowing them to participate meaningfully in the nation's economy and democracy.

The CDE's project summary also identified the need to transform the understanding of special education from the perception of it as:

> A place where students go to receive more or different services, to a viewpoint that includes special education services as one of many programs of support under the umbrella of general education.

In 2020, the CDE commissioned WestEd, a nonprofit dedicated to fostering "success for every learner," to analyze policy and systemic changes affecting students with disabilities since the 2015 report on one system. The 2021 WestEd report, California's Progress Toward Achieving One System: Reforming Education to Serve All Students, explained that the 2015 report on one system was intended to create momentum and discourse in California's efforts to reform special education. To evaluate these efforts, WestEd reviewed the seven focus areas outlined in the 2015 report on one system and provided additional recommendations in each area. WestEd concluded that "numerous improvements have been made to California's general and special education landscapes."

Guided by the insights from the 2015 report on one system and the 2021 WestEd report, local educational agencies (LEAs) should focus on achieving coherence, fostering inclusive practices, and integrating student support systems. This approach is essential for building a comprehensive educational system that promotes positive outcomes for all students. LEAs need to recognize that students receiving special education services are general education students first and operate with the understanding that special education is one of the many support programs within general education, not a place where students go to receive more or different services. These tenets will inform FCMAT's analysis and recommendations throughout this report.

District Alignment with the 2015 Report on One System

Congruent with tenets in the 2015 report on one system, staff interviewed described the district's special education program as a support for students with disabilities, not a place where students with disabilities go to receive a separate education. Staff identified access to general education settings and inclusive practices as critical facilitators of positive outcomes for students with disabilities. Many staff interviewed indicated the district's co-teaching program, which is a service delivery model involving a general education teacher and a special education teacher working together in a general education classroom to support all students, is increasing access to general education settings for students with disabilities. However, many staff interviewed reported staff at certain schools are quick to suggest a student with a disability needs to move to a special day class (SDC) setting instead of working to accommodate their learning differences and needs in a general education setting; recommendations to address this are in the "Professional Learning Plan" section of this report.

To develop well-integrated models of support for students with disabilities, the 2015 report on one system cautions districts to avoid isolating special education as a separate system and recommends that districts focus on collaboration between special education and general education staff. The district's director of special education meets regularly and collaborates frequently with the assistant superintendent of educational services. The Special Education Department staff reported they collaborate regularly with other departments and schools.

Recommendations

The district should:

1. Continue to foster inclusive practices and focus on integrated systems supporting all students.
2. Continue to promote regular collaboration between general education and special education staff.

Identification for Special Education

Before examining the district's special education staffing, it is critical to consider the population the program serves: the students receiving special education services. This section provides an overview of data and trends related to the district's special education enrollment.

District Enrollment

Between 2020-21 and 2025-26, the district's 9-12 census day (official count of enrolled students on the first Wednesday in October) noncharter enrollment decreased by 628 students, as shown in Figure 1 below.

Figure 1. Census Day Noncharter Enrollment of District Students in Grades 9-12, 2020-21 – 2025-26

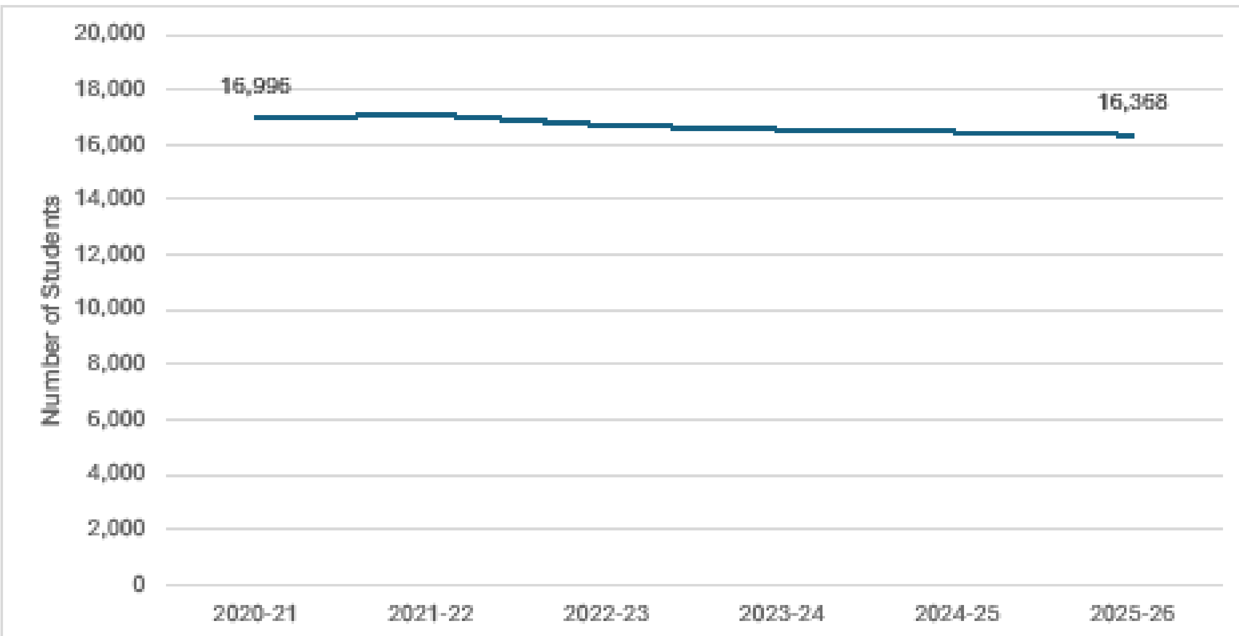

Figure 1. A graph showing that district's noncharter 9-12 census day enrollment decreased by 628 students, from 16,996 students in 2020-21 to 16,368 students in 2025-26.

Source: Enrollment Multi-Year Summary for Charter and Non-Charter Schools-Grossmont Union High School District (CDE).

Between 2020-21 and 2025-26, the district's census day 9-12 special education noncharter enrollment increased by 311 students, as shown in Figure 2 below.

Figure 2. District Special Education Noncharter Enrollment in Grades 9-12, 2020-21 – 2025-26

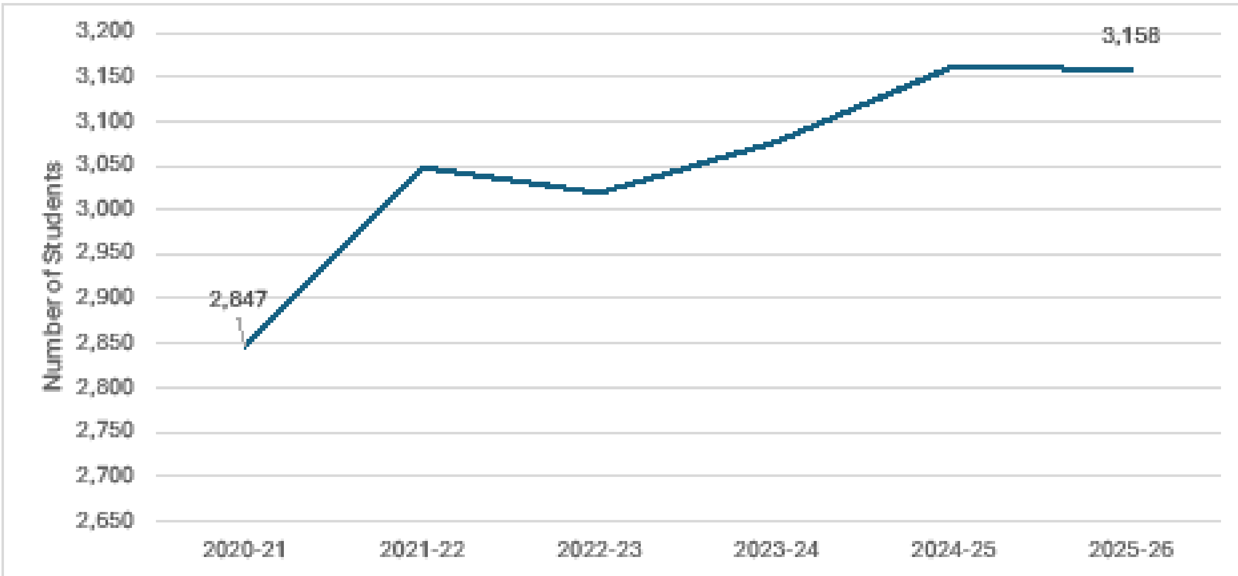

Figure 2. A graph showing that district's noncharter 9-12 special education enrollment increased by 311 students, from 2,847 students in 2020-21 to 3,158 students in 2025-26.

Source: Enrollment Multi-Year Summary for Charter and Non-Charter Schools – Grossmont Union High School District (CDE).

In 2025-26, district students who identify as male are more likely to be identified for special education than those who identify as female. Although they represent 52.5% of all students, they account for 62.7% of students in special education, which mirrors the 2025-26 statewide average calculated from DataQuest. By contrast, students who identify as female make up 47.5% of all students but only 37.3% of those in special education.

This disproportionate representation of males is influenced by factors such as referral bias – for example, students who identify as male are more often referred because of poor grades or behavior support needs – and differences in how teachers perceive behavior, because students who identify as male are more likely to draw negative attention in school. Consequently, it is important for LEAs to analyze special education referral rates by gender identification and provide professional learning as needed to help address any disparities.

District Special Education Enrollment by Disability Category

The Individuals with Disabilities Education Act (IDEA) defines 14 categories of disability under which a student may be eligible for special education. In 2025-26, 92.34% of the district's students enrolled in special education qualified under one of the five categories listed in Table 1 below.

Table 1. Percentage of District Special Education Enrollment by Primary Disability Category, 2019-20 and 2025-26

	Autism	Emotional Disability	Intellectual Disability	Other Health Impairments	Specific Learning Disability
2019-20	13.74%	7.88%	7.85%	19.73%	40.64%
2025-26	15.60%	5.28%	6.64%	22.97%	41.85%
Percentage Point Difference	**1.86**	**-2.60**	**-1.21**	**3.24**	**1.21**

Sources: CALPADS report 16.1 for 2019-20 and CALPADS report 16.12 for 2025-26.

Note: Although IDEA defines 14 disability categories for special education eligibility, this table shows data only for the five most common in the district.

Disproportionality in Special Education Identification

The National Association of School Psychologists defines special education disproportionality as "the extent to which membership in a given group affects the probability of being placed in a specific disability category." In simpler terms, it refers to the over- or underidentification of certain student groups — such as English learners, students who identify as male, or students from specific racial or ethnic backgrounds — for special education.

Racial and Ethnic Balance of Students

In 2025-26, most of the district's noncharter students identified as African American, Hispanic or Latino, two or more races, or White; Table 2 compares these student groups that together accounted for 92.94% of district noncharter enrollment. For most racial and ethnic groups, the percentage of students enrolled in special education was approximately the same as the percentage of all district students. However, in 2025-26, 46.87% of the district's noncharter special education students were Hispanic or Latino, while this ethnic group made up 41.39% of all district noncharter students.

Table 2. Percentage of Noncharter Students in Special Education, by Race and Ethnicity, Compared to Percentage of Total Student Population, 2025-26

	African American	Hispanic or Latino	Two or More Races	White
Percentage of Total Enrollment	5.07%	41.39%	5.58%	40.90%
Percentage of Special Education Enrollment	7.03%	46.87%	6.17%	36.83%
Difference	**1.96**	**5.48**	**0.59**	**-4.07**

Source: Enrollment by Ethnicity in 2025-26 – Grossmont Union High School District (CDE).

According to DataQuest, in 2025-26, English learners represented 15.23% of all district noncharter 9-12 students and 13.05% of noncharter students in special education.

Overrepresentation of Students who Identify as Hispanic or Latino

Although the reason for the district's higher-than-expected identification of Hispanic and Latino students for special education services is unclear, it is imperative that the district identify only qualifying students with disabilities. This is necessary for at least two reasons: first, even the most efficient special education programs do not receive enough funding, so it is essential that these finite resources be used for qualifying students with disabilities; and second, although special education services are vital for students with disabilities, students identified for special education may experience stigma, reduced expectations, and less access to the general education curriculum and teachers. These factors can limit their academic achievement and outcomes.

The district needs to evaluate whether it overidentifies Hispanic and Latino students for special education. The Association of California School Administrators (ACSA) has published a brief titled, The Disproportionality of Latinx Students in Special Education, which discusses common causes of disproportionality of Hispanic and Latino students in special education and provides recommendations on how to address each of them. It would benefit the district to review this brief and use it to investigate its possible overidentification of Hispanic and Latino students in special education.

District Special Education Enrollment Compared to Countywide and Statewide Enrollment

According to DataQuest, over a five-year period the percentage of district noncharter 9-12 students enrolled in special education increased by 2.54 percentage points, from 16.75% in 2020-21 to 19.29% in 2025-26.

FCMAT compared the district's total noncharter 9-12 enrollment and special education enrollment in 2025-26 with noncharter countywide and noncharter statewide 9-12 figures, as shown in Table 3 below.

Table 3. Comparison of Noncharter School 9-12 Total and Special Education Enrollment, 2025-26

	Grossmont	San Diego County	California
Grades 9-12 Total Noncharter School Enrollment	16,368	120,122	1,851,185
Grades 9-12 Special Education Noncharter School Enrollment	3,158	19,646	263,023
Percentage	**19.29%**	**16.36%**	**14.21%**

Sources: Noncharter Enrollment for Grades 9-12 – Grossmont Union High School District (CDE), Noncharter School Enrollment for Grades 9-12 – San Diego County (CDE), and Noncharter School Enrollment for Grades 9-12 - State (CDE).

The district identified a much higher percentage of noncharter 9-12 students as requiring special education than both San Diego County and the state. In addition, the percentage of district students identified as requiring special education grew by 2.54 percentage points between 2020-21 and 2025-26, and the district needs to investigate the reasons for this.

Recommendations

The district should:

1. Annually monitor the percentage of students who qualify for special education and assess the proportionality of the special education population compared with overall enrollment, analyzed at least by gender, race, ethnicity, and English learner status. Provide training on proper identification practices as necessary.

2. Evaluate whether it overidentifies Hispanic and Latino students for special education. Consider using the ACSA brief, The Disproportionality of Latinx Students in Special Education, as a guide.

3. Determine the root causes of its increasing percentage of district students identified as requiring special education. Provide training on proper identification practices and exit procedures from special education as necessary.

District and Special Education Program Organization

District Organization

A school district's organizational structure is crucial to the effectiveness of its special education program. An optimal structure fosters effective communication and collaboration across departments within the district's central office and schools. This collaboration is essential to meet the unique needs of students with disabilities and implement evidence-based practices that support inclusive education.

The district's administrative cabinet includes the superintendent and the assistant superintendents of the Business Services, Educational Services, and Human Resources departments, as shown in Figure 3 below. The assistant superintendent of educational services oversees the director of special education, who provides leadership over the special education program.

Figure 3. Simplified District Organizational Chart - 2025-26

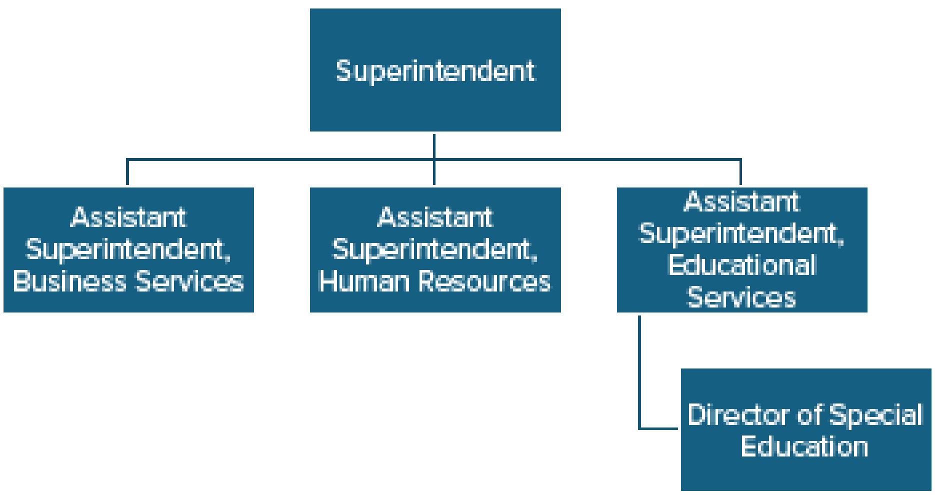

Figure 3. A simplified version of the district's organizational chart that shows administrative cabinet and the director of special education.

Source: District-provided documents.

Consistent with the 2015 report on one system, the district's organization promotes regular communication and collaboration. This structure provides a direct line of communication from Special Education Department leaders to the district's administrative cabinet and supports the inclusion of students with disabilities in districtwide planning. However, staff reported that the Special Education Department has had the authority to make decisions about adding new special education positions and contracts for staff without explicit approval from the administrative cabinet. The best practice is for the administrative cabinet to approve all new special education positions and contracts for staff, and recommendations to address this are discussed in the "Position Control" section of this report.

Special Education Program Organization

School districts and departments can be organized in two main ways: centralized (decision-making authority is concentrated at the district office with a goal of having a high level of uniformity and consistency across district schools) or decentralized (decision-making authority is shared with school leaders who can tailor decisions and support to meet local needs). Leadership and management of the district's special education program have resembled a centralized model.

For the 2026-27 school year, the district will reorganize the leadership and management of the special education program to transition to a more decentralized model. The Special Education Department will continue to have a director and include three assistant directors but eliminate special education program coordinators. Instead, six high schools will be assigned an assistant principal to support the special education program.

Both centralized and decentralized models can be used to effectively support a district's special education program. In Grossmont Union, staff interviewed reported that at certain schools, principals do not take an active role in the special education program and until recently the district has paid substitute administrators to act as administrative designee at individualized education program (IEP) meetings. This is contrary to the 2015 report on one system, which explains that students with disabilities are general education students first and all educators have a collective responsibility to make sure all students receive the education and supports they need to maximize their development and potential. Recommendations for training administrative designees at IEP meetings are included in the "Professional Learning Plan" section of this report.

Recommendation

The district should:

1. Foster a culture where students with disabilities at all district schools are treated as general education students first and where all educators have a collective responsibility to make sure all students receive the education and supports they need to maximize their development and potential.

Position Control

District Position Control System

Position control is a system for tracking positions rather than employees. It serves as the framework for all jobs in an organization, whether filled or vacant. Position control includes the creation, maintenance, and monitoring of positions and their associated budgets. In school districts, position control is managed collaboratively by the Human Resources and Business Services departments. An effective system is based on staffing ratios aligned with site and department needs and applicable contract requirements.

Staff reported that the district developed and began implementing a position control system midway through the 2025-26 school year. Prior to this, district staffing levels were not consistently linked to approved budgets, increasing the risk that positions were recruited for and filled without confirmed funding or approval. Consistent use of a position control system prevents unplanned payroll expenses, overstaffing or understaffing, and fiscal distress.

While examining the district's position control system is beyond the scope of work for this FCMAT study, the district needs to use its position control system when evaluating and filling all special education positions to ensure staffing decisions align with approved budgets. In addition, the district needs to establish processes and procedures between the Special Education, Human Resources and Business Services departments to ensure budget adjustments are made when positions are added, reduced, or modified, including changes to NPA contracts.

New Special Education Positions

A well-defined and consistently used approval process to consider new positions should be part of a district's position control system. This ensures all new positions are reviewed, approved, and funds are available before they are filled. The industry standard practice is for all new and repurposed positions, and contracts with nonpublic agencies for staff, to be considered and approved by an LEA's administrative cabinet. Following this process ensures a position is tied to an approved budget and is aligned with the LEA's strategic priorities and goals.

Staff reported that the Special Education Department has historically had the autonomy to hire and repurpose staff, and to add additional contracted staff from an NPA, without explicit approval of the administrative cabinet. In addition, staff reported principals can call an NPA directly and request additional special education staff without approval from the Special Education Department or administrative cabinet.

Recommendations

The district should:

1. Consistently use its position control system to create, maintain and monitor individual positions and the budgets for them.
2. Begin requiring administrative cabinet approval for all new and repurposed special education positions.
3. Begin requiring administrative cabinet approval for all changes in nonpublic agency staff.
4. Establish processes and procedures between the Special Education, Human Resources and Business Services departments so adjustments to the budget are made when changes are made to positions or NPA contracts.

Central Office Special Education Staffing

Administrator/Leadership Positions

The Special Education Department has 12.20 FTE administrator/leadership positions supporting its special education program, as shown in Table 4 below.

Table 4. Administrator/Leadership Positions Supporting Special Education in 2025-26

Position Title	Number of Positions	Total FTE
Director I	1	1.00
Director II	2	2.00
Program Coordinator – Special Education	4	4.00
Program Specialist	2	2.00
Principal – Special Education Academy	2	1.20
Vice Principal – Charter Schools	1	1.00
Teacher On Special Assignment (TOSA)	1	1.00
Total	**13**	**12.20**

Source: District-provided data.

Notes: Positions listed in this table do not provide direct service to students.

One of the program coordinator positions was unfilled and one of the administrators in a Director II position was on leave in 2025-26.

Administrative Support Positions

The district has 18.75 FTE administrative support staff positions supporting the special education program, as shown in Table 5 below.

Table 5. Administrative Support Staff Positions Supporting Special Education in 2025-26

Position Title	Number of Positions	Total FTE
Accounting Technician	2	2.00
Special Education Data Technician	1	1.00
Administrative Assistant I	1	0.25
Administrative Assistant II	3	3.00
Administrative Assistant III	1	1.00
Office Assistant	12	11.50
Total	**20**	**18.75**

Source: District-provided data.

Note: One accounting technician position and a 0.50 FTE office assistant position were vacant in 2025-26.

Special Education Staffing Comparison

FCMAT conducted an informal survey of school districts in California with student enrollment similar to that of the Grossmont Union High School District. Since Grossmont Union provides special education services to two large charter schools it authorizes, the district's total enrollment, including the authorized charter schools (instead of noncharter enrollment), was used to find comparable districts. The survey aimed to collect information on central office staffing within the school districts' special education departments:

- **Central Office Administrator/Leadership Positions –** Roles such as directors, assistant directors, coordinators, program specialists, and teachers on special assignment (TOSAs). These positions do not require an administrative credential.
- **Central Office Administrative Support Positions –** Roles such as secretaries, administrative assistants, filing clerks, and data technicians.

Table 6 below compares the Grossmont Union High School District Special Education Department central office staffing with data from the 12 school districts that participated in FCMAT's survey. On average, these school districts have 8.97 FTE administrator/leadership positions supporting special education in the central office, while Grossmont Union reports a higher level of staffing of 12.20 FTE. For special education administrative support positions in the central office, the comparison school districts average 7.23 FTE, and Grossmont Union reports a significantly higher level of staffing of 18.75 FTE.

Table 6. Administrator and Administrative Support Position Staffing Comparison

District	County	2025-26 Census Day Enrollment	2025-26 Administrator/ Leadership Position FTE	2025-26 Administrative Support Position FTE
ABC Unified	Los Angeles	17,300	5.00	6.00
Alvord Unified	Riverside	16,043	7.00	7.00
Antioch Unified	Contra Costa	16,081	10.00	4.00
Beaumont Unified	Riverside	20,725	8.00	4.00
Coachella Valley Unified	Riverside	15,618	9.00	16.00
Colton Joint Unified	San Bernardino	17,830	9.00	4.00
Compton Unified	Los Angeles	19,325	6.00	6.00
Fairfield-Suisun Unified	Solano	20,010	11.00	11.50
Hayward Unified	Alameda	19,631	8.00	6.00
Montebello Unified	Los Angeles	18,445	9.00	9.00
Pajaro Valley Unified	Santa Cruz	16,452	11.65	5.75
Val Verde Unified School District	Riverside	18,717	14.00	7.50
Average FTE			**8.97**	**7.23**
Grossmont Union High School District	San Diego	21,176	12.20	18.75

Sources: Comparisons (Ed-Data) and FCMAT survey results.

Notes: Grossmont Union School District was excluded from the average FTE calculations.

Teachers on special assignments were included in administrator/leadership FTE if they are ongoing positions and perform special education program support functions in the central office.

Any variances in a school district's actual FTE are due to FCMAT's interpretation of the survey data.

Total student enrollment for Helix and Steele Canyon high schools were added to the district's total noncharter enrollment for this analysis because the district provides special education services to these charter schools through an MOU.

In 2025-26, Grossmont Union High School District has 3.23 FTE more administrator/leadership positions and 11.52 FTE more administrative support positions facilitating the special education program compared to the surveyed school districts. Staffing should align with program complexity, compliance requirements, and student enrollment trends. Grossmont Union has significantly more administrative support positions for its special education program because it assigns a special education office assistant to each district school to perform administrative support tasks for special education staff. While this practice may allow staff who provide direct services to students more time to do so, if staffing exceeds program needs, resources may be diverted from direct student services.

Recommendation

The district should:

1. Annually monitor special education enrollment and program support needs to determine whether changes in the current number of administrator/leadership and administrative support positions in the Special Education Department are needed.

Special Education Teacher Staffing

FCMAT compared the district's special education teacher staffing to statewide guidelines and/or industry standards.

Education Specialists for Students with Mild-to-Moderate Support Needs

The contract between the district and the teachers' association states, "Comprehensive Sites Mild to Moderate Teacher/Student caseload of 24:1. Alternative Sites (Chap/IDEA) Mild Moderate Teacher/Student caseload of 20:1."

In 2025-26, the district has 133.40 FTE teachers who provide support for students with mild-to-moderate support needs who are not in an SDC. Based on caseload estimates provided by the district, these teachers manage the cases of 2,729 students, averaging 20.46 students per teacher, as shown in Table 7 below.

Table 7. Education Specialist Staffing for Students with Mild-to-Moderate Support Needs, 2025-26

Total Teacher FTE	Total Student Caseload	Average Teacher Caseload	Industry Standard	Staffing Needed to Meet Industry Standard	Staffing Above (+) or Below (-) Industry Standard
133.40	2,729	20.46	20-24 students per teacher	136.45 FTE (20 students per teacher) 113.71 FTE (24 students per teacher)	Within the industry standard range

Sources: District-provided data and industry standards.

In 2025-26, the districtwide teacher staffing for students with mild-to-moderate support needs who are not in an SDC is within the industry standard range.

Special Day Class Staffing – School-Age Programs

The Education Code does not define class size or caseload maximums for SDC programs. The industry standard caseload ranges for SDC programs are shown in Table 8 below.

Table 8. Industry Standard Class Size Numbers for Special Day Class Programs

Program Type	Industry Standard Caseload Range
Mild/Moderate Support Needs Special Day Class – Noncategorical	Transitional Kindergarten through Grade 12 – 12-15 students per 1 teacher
Extensive Support Needs Special Day Class – Noncategorical	Transitional Kindergarten through Grade 12 – 10-12 students per 1 teacher
Special Day Class – Autism Focus	Transitional Kindergarten through Grade 12 – 8-10 students per 1 teacher
Therapeutic Special Day Class – Mental Health and Behavioral Support Needs	Transitional Kindergarten through Grade 12 – 8-10 students per 1 teacher

Sources: Industry standards.

The contract between the district and the teachers' association states, "ESN Teacher/Student caseload of 14:1. Alternative Academics (ELITE/MERIT) and programs (AMP/PLUS) Teacher/Student caseload of 12:1."

Mild-to-Moderate Special Day Class Programs

In 2025-26, the district has 5.00 FTE SDC teachers of classes for students with mild-to-moderate support needs. Based on caseload estimates provided by the district, these teachers managed the cases of 60 students, averaging 12.00 students per teacher, as shown in Table 9 below.

Table 9. Mild-to-Moderate Special Day Class Program Teacher Staffing, 2025-26

Total Teacher FTE	Total Student Caseload	Teacher Caseload Average	Industry Standard Caseload Range	Staffing FTE Needed to Meet Industry Standard	Staffing FTE Above (+) or Below (-) Industry Standard
5.00	60	12.00	12-15 students per teacher	5.00 FTE (12 students per teacher) 4.00 FTE (15 students per teacher)	Within industry standard range

Sources: District-provided data and industry standards.

In 2025-26, the districtwide mild-to-moderate SDC teacher staffing is within the industry standard range.

Extensive Support Needs Special Day Class Program

In 2025-26, the district has 47.80 FTE SDC teachers for students with extensive support needs. Based on caseload estimates provided by the district, these teachers managed the cases of 471 students, averaging 9.85 students per teacher, as shown in Table 10 below.

Table 10. Extensive Support Needs Special Day Class Program Teacher Staffing, 2025-26

Total Teacher FTE	Total Student Caseload	Average Caseload Per Teacher	Industry Standard Caseload Range	Staffing FTE Needed to Meet Industry Standard	Staffing FTE Above (+) or Below (-) Industry Standard
47.80	471	9.85	10-12 students per teacher – cross-categorical	47.10 FTE (10 students per teacher) 39.25 FTE (12 students per teacher	Within industry standard range

Sources: District-provided data and industry standards.

In 2025-26, the districtwide extensive support needs SDC teacher staffing is within the industry standard range.

Therapeutic Special Day Class Program

The district has two types of therapeutic SDCs: Positive Learning Utilizing Supports (PLUS) programs and the Making Education Relevant, Innovative, Therapeutic (MERIT) Academy.

In 2025-26, it has 7.00 FTE SDC teachers for its PLUS programs. Based on caseload estimates provided by the district, these teachers managed the cases of 66 students, averaging 9.43 students per teacher, as shown in Table 11 below.

In 2025-26, it has 7.00 FTE SDC teachers for its MERIT Academy. Based on caseload estimates provided by the district, these teachers managed the cases of 64 students, averaging 8.83 students per teacher, as shown in Table 11 below.

Table 11. Therapeutic Special Day Class Program Teacher Staffing, 2025-26

Program	Total Teacher FTE	Total Student Caseload	Average Caseload Per Teacher	Industry Standard Caseload Range	Staffing FTE Needed to Meet Industry Standard	Staffing FTE Above (+) or Below (-) Industry Standard
PLUS	7.00	66	9.43	8-10 students per teacher	8.25 FTE (8 students per teacher) 6.60 FTE (10 students per teacher)	Within industry standard range
MERIT Academy	7.00	64	9.14	8-10 students per teacher	8.00 FTE (8 students per teacher) 6.40 FTE (10 students per teacher)	Within industry standard range

Sources: District-provided data and industry standards.

In 2025-26, the districtwide therapeutic SDC teacher staffing is within the industry standard range.

Autism Special Day Class Program

The district's Enhancing Learning through Innovative Teaching Environments (ELITE) Academy provides specialized academic and behavioral intervention services for certain students with an intellectual disability or autism. In 2025-26, the district has 4.00 FTE SDC teachers for its ELITE Academy. Based on caseload estimates provided by the district, these teachers managed the cases of 31 students, averaging 7.75 students per teacher, as shown in Table 12 below.

Table 12. ELITE Academy Teacher Staffing, 2025-26

Total Teacher FTE	Total Student Caseload	Average Caseload Per Teacher	Industry Standard Caseload Range	Staffing FTE Needed to Meet Industry Standard	Staffing FTE Above (+) or Below (-) Industry Standard
4.00	31	7.75	8-10 students per teacher	3.88 FTE (8 students per teacher) 3.10 FTE (10 students per teacher)	Within industry standard range

Sources: District-provided data and industry standards.

In 2025-26, the districtwide ELITE Academy staffing is within the industry standard range.

Recommendation

The district should:

1. Annually compare teacher staffing and caseloads to industry standards and ensure they are adequate to meet student needs.

Special Education Instructional Aide Staffing

Special education instructional aides, also known as special education assistants or paraeducators, are trained professionals who work with students, typically under the direction of a classroom teacher. LEAs often employ special education instructional aides under different titles with distinct job descriptions to perform functions such as specialized academic instruction, specialized medical support, behavioral support, and 1-to-1 student support or intensive individual service (IIS). The district employs instructional aides under several different job descriptions.

Industry Standard SDC Instructional Aide Staffing Ratios

The industry standard base staffing for SDCs is to assign one instructional aide for every teacher of students with mild-to-moderate and extensive support needs. For SDCs serving students with autism, the base staffing standard is two special education instructional aides for every teacher. In addition, the industry standard for staffing in excess of the SDC base staffing level is determined by an adult-to-student ratio, as shown in Table 13 below.

Table 13. Industry Standard Instructional Aide Staffing and Adult-to-Student Ratios

SDC Support Level	SDC Focus	Industry Standard Special Education Instructional Aide Staffing	Adult-to-Student Ratio
Mild-to-Moderate	Cross-categorical	One to two six-hour special education instructional aides for a class size of 12-15	1-to-7
Extensive	Cross-categorical	One to two six-hour special education instructional aides for a class size of 10-12	1-to-5
All	Autism	Two to four six-hour special education instructional aides for a class size of 8-10	1-to-3

Source: Industry standards.

Note: Industry standard staffing for special education instructional assistants is determined by class size to meet an adult-to-student ratio, which includes the classroom teacher and special education instructional assistant(s).

District SDC Program Instructional Aide Staffing

The district has not established instructional aide staffing guidelines and does not use an adult-to-student ratio to staff its SDCs so those classes may be over- or understaffed. Assigning more instructional aide support than necessary is costly and may limit students' opportunities to gain independence; however, not assigning enough instructional aide support to an SDC can mean that students lack appropriate support and supervision. Therefore, the district would benefit from adopting an adult-to-student ratio as the staffing guideline for its SDC programs.

When using adult-to-student ratios to determine staffing, the best practice is to include the teacher and classroom instructional aides in the adult portion of the ratio, and to remove any students who have 1-to-1 student support for most of the school day and their assigned 1-to-1 support person from the ratio.

FCMAT analyzed the district's 2025-26 instructional aide staffing in its SDCs for students with extensive support needs as shown in Table 14 below.

Table 14. Extensive Support Needs SDC Instructional Aide Allocation – District Compared to Industry Standards, 2025-26

School and SDC Class	SDC Class Enrollment	SDC Class Enrollment Less Students with 1-to-1 Student Support	No. of Special Education Classroom Support Instructional Aide(s)	Adult to Student Ratio (Teacher and Classroom Support Instructional Aide(s) to Students)	Industry Standard Adult to Student Ratio (Teacher and Classroom Support Instructional Aide(s) to Students)	Classroom Support Instructional Aide Staffing Above (+) or Below (-) Industry Standard
El Cajon Valley - Special Day Class	12	11	3	4-to-11 or 0.36	1-to-5 or 0.20	+1 Above industry standard
El Cajon Valley - Special Day Class	6	6	2	3-to-6 or 0.50	1-to-5 or 0.20	+1 Above industry standard
El Cajon Valley - Special Day Class	13	11	4	5-to-11 or 0.45	1-to-5 or 0.20	+2 Above industry standard
El Cajon Valley - Special Day Class	11	9	3	4-to-9 or 0.44	1-to-5 or 0.20	+2 Above industry standard
El Cajon Valley - Special Day Class	7	7	2	3-to-7 or 0.43	1-to-5 or 0.20	+1 Above industry standard
El Cajon Valley - Special Day Class	9	9	2	3-to-9 or 0.33	1-to-5 or 0.20	+1 Above industry standard
El Cajon Valley - Special Day Class	8	7	2	3-to-7 or 0.43	1-to-5 or 0.20	+1 Above industry standard
El Cajon Valley - Special Day Class	8	8	2	3-to-8 or 0.38	1-to-5 or 0.20	+1 Above industry standard
El Capitan - Special Day Class	8	6	2	3-to-6 or 0.50	1-to-5 or 0.20	+1 Above industry standard
El Capitan - Special Day Class	7	5	2	3-to-5 or 0.60	1-to-5 or 0.20	+1 Above industry standard
El Capitan - Special Day Class	16	14	2	3-to-14 or 0.21	1-to-5 or 0.20	Equal to industry standard
El Capitan - Special Day Class	8	7	2	3-to-7 or 0.43	1-to-5 or 0.20	+1 Above industry standard
El Capitan - Special Day Class	9	6	3	4-to-6 or 0.67	1-to-5 or 0.20	+2 Above industry standard
Granite Hills - Special Day Class	7	4	2	3-to-4 or 0.75	1-to-5 or 0.20	+1 Above industry standard
Granite Hills - Special Day Class	9	7	2	3-to-7 or 0.43	1-to-5 or 0.20	+1 Above industry standard
Granite Hills - Special Day Class	8	5	2	3-to-5 or 0.60	1-to-5 or 0.20	+1 Above industry standard
Granite Hills - Special Day Class	11	9	4	5-to-9 or 0.56	1-to-5 or 0.20	+3 Above industry standard
Granite Hills - Special Day Class	8	6	2	3-to-6 or 0.50	1-to-5 or 0.20	+1 Above industry standard
Granite Hills - Special Day Class	10	7	2	3-to-7 or 0.43	1-to-5 or 0.20	+1 Above industry standard
Grossmont - Special Day Class	13	10	3	4-to-10 or 0.40	1-to-5 or 0.20	+2 Above industry standard
Grossmont - Special Day Class	10	9	3	4-to-9 or 0.44	1-to-5 or 0.20	+2 Above industry standard
Grossmont - Special Day Class	10	10	5	6-to-10 or 0.60	1-to-5 or 0.20	+4 Above industry standard
Grossmont - Special Day Class	12	12	4	5-to-12 or 0.42	1-to-5 or 0.20	+2 Above industry standard
Grossmont - Special Day Class	12	12	5	6-to-12 or 0.50	1-to-5 or 0.20	+3 Above industry standard
Helix - Special Day Class	14	12	6	7-to-12 or 0.58	1-to-5 or 0.20	+4 Above industry standard
Helix - Special Day Class	16	14	6	7-to-14 or 0.50	1-to-5 or 0.20	+4 Above industry standard
Helix - Special Day Class	6	4	2	3-to-4 or 0.75	1-to-5 or 0.20	+1 Above industry standard
Mount Miguel - Special Day Class	11	9	2	3-to-9 or 0.33	1-to-5 or 0.20	+1 Above industry standard

School and SDC Class	SDC Class Enrollment	SDC Class Enrollment Less Students with 1-to-1 Student Support	No. of Special Education Classroom Support Instructional Aide(s)	Adult to Student Ratio (Teacher and Classroom Support Instructional Aide(s) to Students)	Industry Standard Adult to Student Ratio (Teacher and Classroom Support Instructional Aide(s) to Students)	Classroom Support Instructional Aide Staffing Above (+) or Below (-) Industry Standard
Mount Miguel - Special Day Class	10	8	3	4-to-8 or 0.50	1-to-5 or 0.20	+2 Above industry standard
Mount Miguel - Special Day Class	9	7	3	4-to-7 or 0.57	1-to-5 or 0.20	+2 Above industry standard
Mount Miguel - Special Day Class	10	9	2	3-to-9 or 0.33	1-to-5 or 0.20	+1 Above industry standard
Mount Miguel - Special Day Class	12	10	3	4-to-10 or 0.40	1-to-5 or 0.20	+2 Above industry standard
Mount Miguel - Special Day Class	12	11	2	3-to-11 or 0.27	1-to-5 or 0.20	Equal to industry standard
Monte Vista - Special Day Class	12	9	2	3-to-9 or 0.33	1-to-5 or 0.20	+1 Above industry standard
Monte Vista - Special Day Class	6	4	2	3-to-4 or 0.75	1-to-5 or 0.20	+1 Above industry standard
Monte Vista - Special Day Class	12	10	2	3-to-10 or 0.30	1-to-5 or 0.20	+1 Above industry standard
Monte Vista - Special Day Class	8	5	2	3-to-5 or 0.60	1-to-5 or 0.20	+1 Above industry standard
Monte Vista - Special Day Class	7	4	2	3-to-4 or 0.75	1-to-5 or 0.20	+1 Above industry standard
Santana - Special Day Class	11	9	4	5-to-9 or 0.56	1-to-5 or 0.20	+3 Above industry standard
Santana - Special Day Class	8	6	4	5-to-6 or 0.83	1-to-5 or 0.20	+3 Above industry standard
Steele Canyon - Special Day Class	12	8	2	3-to-8 or 0.38	1-to-5 or 0.20	+1 Above industry standard
Valhalla - Special Day Class	12	7	3	4-to-7 or 0.57	1-to-5 or 0.20	+2 Above industry standard
Valhalla - Special Day Class	9	9	2	3-to-9 or 0.33	1-to-5 or 0.20	+1 Above industry standard
Valhalla - Special Day Class	7	3	2	3-to-3 or 1.00	1-to-5 or 0.20	+1 Above industry standard
West Hills - Special Day Class	8	4	2	3-to-4 or 0.75	1-to-5 or 0.20	+1 Above industry standard
West Hills - Special Day Class	19	17	2	3-to-17 or 0.18	1-to-5 or 0.20	-1 Below industry standard
West Hills - Special Day Class	8	4	2	3-to-4 or 0.75	1-to-5 or 0.20	+1 Above industry standard

Sources: Industry standards and district-reported data.

Note: Only schools with SDCs taught by teachers for students with extensive support needs were included in this table.

In 2025-26, the districtwide instructional aide staffing for its SDCs for students with extensive support needs is higher than the industry standards. If the district had staffed its SDC program for students with extensive support needs using the industry standard adult-to student ratio, it may have been able to reduce by 70 instructional aides.

The industry standard practice is to assign a special education instructional aide to a specific special education teacher or SDC. This enables the district to ensure students and classes have adequate support based on student enrollment and needs. The district does not do this. Instead, staff reported that school staff are assigned to a school and may be reassigned daily. While flexibility to reassign staff to cover needs is useful, staff still should be assigned to a specific teacher or SDC as part of a district's comprehensive position control system.

1-to-1 Student Support

In 2025-26, the district has 175 instructional aides who are assigned to provide 1-to-1 student support. While there is no established industry standard for special education instructional assistants providing 1-to-1 student support, in Grossmont Union, 4.67% of the students in its special education program (including students in special education at Helix and Steele Canyon high schools) have a 1-to-1 instructional aide. The last seven districts FCMAT studied had assigned an average of 3.56% of the students in their special education program a 1-to-1 instructional aide.

Industry practice commonly refers to both the assessment process and the special education paraeducator role as special circumstance instructional assistance (SCIA). The district uses the San Diego County Office of Education's SCIA assessment process to make decisions regarding assignment of 1-to-1 student support. This process clarifies decision-making procedures and recognizes that 1-to-1 instructional assistance is a significant program decision that should be based on a thorough, data-driven evaluation that includes considering all less-restrictive alternatives. Staff reported many students with 1-to-1 student support came into the district from their feeder middle school with that service as part of their offer of a free appropriate public education (FAPE). Staff indicated that the SCIA assessment is used consistently across district schools to determine whether there is a need for 1-to-1 student support.

Part of the SCIA assessment process focuses on planning for a student's transition to independence and developing annual IEP goals to support this. Annual IEP goals focus IEP services on addressing deficit areas to strengthen skills, provide a basis for monitoring annual programs, and support the IEP in determining when adjustments to service levels are needed. Staff interviewed reported that the district expects for IEP teams to write goals for independence and/or plans to reduce a student's reliance on 1-to-1 student support and that they consistently do so.

The district needs to continue to write goals for independence and/or plans to reduce a student's reliance on 1-to-1 student support because even though a parent/guardian or staff member's request for a student to have 1-to-1 support may be well meaning, according to the University of Colorado at Denver's Paraprofessional Resources and Research Center, it can hinder the student's education in the following ways:

- The paraeducator may become the student's primary service provider, and the teacher's involvement and interactions with the student may be limited. The University of Colorado at Denver's Paraprofessional Resources and Research Center cautions, "This practice is further exacerbated when paraeducators are not qualified and or trained. It is not in the best interest of the students with most complex needs to be taught by the least qualified staff member."
- The paraeducator's constant presence may cause the student to become overly dependent on that adult to do things they could otherwise do independently.
- The paraeducator may create social barriers between the student they are supporting and the student's peers.

Recommendations

The district should:

1. Begin to use the industry standard adult-to-student ratios to determine the assignment of special education instructional aides to SDCs.

2. Begin assigning special education instructional aides to a specific teacher or SDC instead of to a school so it may ensure it is not over- or understaffed.
3. Determine whether it may reduce the number of special education instructional aides in its extensive support needs SDCs and still meet student needs.
4. Continue to require for its SCIA assessment to be used to determine whether a student needs 1-to-1 student support.
5. Continue to write goals for independence and/or plans to reduce a student's reliance on 1-to-1 student support.
6. Begin collaborating with its feeder schools to ensure consistent 1-to-1 student support identification practices across the SELPA.

Related Service Provider Staffing and Caseloads

Related services are the developmental, corrective and other services required to help a child with a disability benefit from special education (34 CFR 300.34). These services are written into students' IEPs and include but are not limited to physical therapy (PT), speech and language therapy, and occupational therapy (OT).

FCMAT analyzed staffing ratios for the district's adaptive physical education (APE) teacher, credentialed school nurses, OTs, PTs, school psychologists, speech and language therapists, and vision and orientation and mobility specialists. Staffing ratios for other related service providers were not analyzed because there is no established industry standard for them. The industry standards for related service providers are shown in Table 15 below.

Table 15. Industry Standard Provider-to-Student Ratios

Provider Type	Industry Standard or Education Code Provider-to-Student Ratio
Psychologist	1-to-977
SLP (preschool)	1-to-40
SLP (ages 5-22)	1-to-55
APE Teacher	1-to-45-55
Physical Therapist	1-to-45-55
Occupational Therapist	1-to-45-55
Vision and Orientation and Mobility	1-to-10-30
Deaf and Hard of Hearing	1-to-15-25
Nurse	1-to-2,274

Sources: Industry standards, Education Code 56363.3, and Pupil Services Staff by Type (CDE).

Adapted Physical Education

Districts need to annually review APE teacher caseload projections, assessment loads, the number of schools each APE teacher supports, driving times between schools, direct and consultation service minutes, how services are provided, and students' needs to determine if they need to change the number of APE teachers.

In 2025-26, the district has 2.00 FTE APE teachers with an average caseload of 85 students receiving direct services, as shown in Table 16 below.

Table 16. Adapted Physical Education Teacher Staffing, 2025-26

Provider	Number of FTE	2025-26 Total Caseload	Caseload Average	Industry Standard Provider-to-Student Ratio	FTE Needed to Meet Industry Standard	Staffing Above (+) or Below (-) Industry Standard
APE Teacher	2.00	170	85	1-to-45-55	3.78 FTE (to meet 1-to-45) 3.09 FTE (to meet 1-to-55)	-1.78 FTE (above 1-to-45) -1.09 FTE (above 1-to-55)

Sources: District-provided data and industry standards.

Note: Only students receiving direct services from the district's APE teacher were included in the total caseload and related calculations.

As shown in the table, the district is staffed more than 1.00 FTE less than the industry standard staffing level range for APE teachers in 2025-26.

Credentialed School Nurses

Districts need to annually review their enrollment, special education enrollment, duties performed by credentialed school nurses and other health specialists, schoolwide needs, driving time between schools, and students' needs to determine if changes to credentialed school nurse staffing are needed.

In 2025-26, the district has 3.00 FTE credentialed school nurse positions, with an average caseload of 7,058.67 students, as shown in Table 17 below.

Table 17. Credentialed School Nurse Staffing, 2025-26

Provider	Number of FTE	2025-26 Adjusted Census Day Enrollment	Caseload Average	Industry Standard Provider-to-Student Ratio	FTE Needed to Meet Industry Standard	Staffing Above (+) or Below (-) Industry Standard
Credentialed School Nurse	3.00	21,176	7,058.67	1-to-2,274	9.31 FTE	-6.31 FTE

Sources: Pupil Services Staff by Type (CDE), district-provided data, and DataQuest.

Note: Total student enrollment for Helix and Steele Canyon high schools were added to the district's total noncharter enrollment for this analysis because the district provides special education services to these charter schools through an MOU.

As shown in the table, district staffing falls more than 6.00 FTE short of the industry standard staffing levels for credentialed school nurses. In addition to its credentialed school nurse staffing, the district has licensed vocational nurse (LVN) and health specialist positions to help support school and student needs.

Occupational Therapy

Districts need to annually review OT caseload projections, assessment loads, the number of schools each OT serves, driving time between schools, direct and consultation service minutes, and students' needs to determine the number of OTs needed.

In 2025-26, the district has 3.00 FTE OT positions, with an average caseload of 33.33 students receiving direct services, as shown in Table 18 below. Also, in 2025-26 the district contracts with an NPA for an additional OT.

Table 18. District Occupational Therapist Staffing, 2025-26

Provider	Number of FTE	2025-26 Total Caseload	Case-load Average	Industry Standard Provider-to-Student Ratio	FTE Needed to Meet Industry Standard	Staffing Above (+) or Below (-) Industry Standard
Occu-pational Therapist	3.00	100	33.33	1-to-45-55	2.22 FTE (to meet 1-to-45) 1.82 FTE (to meet 1-to-55)	+0.78 FTE (to meet 1-to-45) +1.18 FTE (to meet 1-to-55)

Sources: District-provided data and industry standards.

Notes: Only students receiving direct services from occupational therapists were included in the total caseload and related calculations.

In 2025-26, the district also contracted with a NPA for an additional OT.

As shown in the table, the district is staffed 0.78 to 1.18 FTE more than the industry standard range for OTs. Staff reported that the district needs more OTs than the industry standard range due to the relatively large number of students receiving consultation services from an OT. Staff reported consultation service needs also caused the district to contract with an NPA for an additional OT during 2025-26.

Physical Therapy

Districts need to annually review PT caseload projections, assessment loads, the number of schools each PT serves, driving time between schools, direct and consultation service minutes, and students' needs to determine the number of PTs needed.

In 2025-26, the district has a 1.00 FTE PT position, with a caseload of 10 students receiving direct services, as shown in Table 19 below.

Table 19. District Physical Therapist Staffing, 2025-26

Provider	Number of FTE	2025-26 Total Caseload	Caseload Average	Industry Standard Provider-to-Student Ratio	FTE Needed to Meet Industry Standard	Staffing Above (+) or Below (-) Industry Standard
Physical Therapist	1.00	10	10.00	1-to-45-55	0.22 FTE (to meet 1-to-45) 0.18 FTE (to meet 1-to-55)	+0.78 FTE (to meet 1-to-45) +0.82 FTE (to meet 1-to-55)

Sources: District-provided data and industry standards.

Note: Only students receiving direct services from physical therapists were included in the total caseload and related calculations.

As shown in the table, the district is staffed higher than the industry standard range for PTs. Hiring or contracting for a part-time PT may be appropriate given the small number of students who receive direct PT services. However, 85 students receive consultation PT services, and a PT provides vital information about specialized equipment needs at individual educational program (IEP) meetings for students with orthopedic impairments. In addition, IEP meetings occur five days a week, so it can be difficult for a part-time PT to attend all of the IEPs they need to. Given this, the district's PT staffing may be necessary.

School Psychologists for School-Age Programs

Districts need to annually review the following items to help determine how many FTE school psychologist positions are needed:

- The number of initial psychoeducational assessments in the current school year.
- The number of annual and triennial psychoeducational assessments expected next school year.
- The number of early reassessments expected next school year.
- Total student enrollment.
- Special education enrollment.
- Individual student and school needs.

In 2025-26, the district has 22.00 FTE school psychologist positions, each with an average caseload of 962.55 students, as shown in Table 20 below.

Table 20. School Psychologist Staffing Compared to Industry Standard, 2025-26

Provider	Number of FTE	2025-26 Census Day Enrollment	Caseload Average	Industry Standard Provider-to-Student Ratio	FTE Needed to Meet Industry Standard	Staffing Above (+) or Below (-) Industry Standard
School Psychologist	22.00	21,176	962.55	1-to-977	21.67 FTE	+0.33 FTE

Sources: District-provided data, Pupil Services Staff by Type (CDE), and DataQuest.

Note: Total student enrollment for Helix and Steele Canyon high schools were added to the district's total noncharter enrollment for this analysis because the district provides special education services to these charter schools through an MOU.

As shown in the table, the district is staffed approximately equal to the industry standard for school psychologists.

Speech and Language Pathologists

Education Code 56363.3 addresses SLPs serving school-age students. It states, "The average caseload for language, speech, and hearing specialists in special education local plan areas shall not exceed 55 cases, unless the local plan specifies a higher average caseload and the reasons for the greater average caseload." Districts need to annually review SLP caseload projections and students' needs to determine if changes to SLP staffing are needed.

In 2025-26, the district has 23.80 FTE SLPs (11 are contracted through a nonpublic agency) working exclusively with school-age students who each manage an average caseload of 54.54 students, as shown in Table 21 below.

Table 21. School-Age Speech and Language Pathologist Staffing, 2025-26

Provider	Number of FTE	2025-26 Total Caseload	Caseload Average	Education Code Standard Provider-to-Student Ratio	FTE Needed to Meet Education Code Standard	Staffing Above (+) or Below (-) Education Code Standard
Speech and Language Pathologist	23.80	1,298	54.54	1-to-55	23.60	+0.20 FTE

Sources: District-provided data and EC 56363.3.

As shown in the table, if considering the district's staffing and caseload numbers (not SELPA-wide), the district's staffing approximates the Education Code maximum staffing level for SLPs for school-age programs. Since the students who receive services from an SLP are not neatly distributed into groups of 55 across district schools, having more staffing than is required to meet the EC 56363.3 standard may be necessary.

The district contracts with NPAs for almost half of its SLPs. This is a much higher percentage of contracted SLPs than what FCMAT typically observes across the state. Staff reported they contract for so many SLPs because it is difficult to recruit and retain district employed SLPs. Accordingly, in 2025-26, the district began providing a $1,500 stipend when SLPs complete the Certificate of Clinical Competence (CCC). District SLPs are eligible to receive an additional $1,500 stipend for each three-year renewal of the CCC. However, the district would benefit from evaluating the cost of hiring district versus contracted SLPs and determine whether changes in compensation as well as additional incentives for recruitment and/or retention may allow the district to hire more of its own SLPs. Not hiring district employed SLPs may increase the district's costs because contracted employees are often more expensive than district staff. In addition, hiring its own employees would give the district more control over the management of its SLPs and may improve service to students. Contracted SLPs also may have more of a disincentive to exit students from services to maintain the same level of contracted service, which increases district costs.

Vision and Orientation and Mobility Specialists

Districts need to annually review vision and orientation and mobility specialist caseload projections, assessment loads, the number of schools each specialist serves, driving time between schools, direct and consultation service minutes, and students' needs to determine the number of vision and orientation and mobility specialists needed.

In 2025-26, the district has 1.80 FTE vision and orientation and mobility specialists who each manage an average caseload of 26.11 students, as shown in Table 22 below.

Table 22. Vision and Orientation and Mobility Specialist Staffing, 2025-26

Provider	Number of FTE	2025-26 Total Caseload	Caseload Average	Education Code Standard Provider-to-Student Ratio	FTE Needed to Meet Education Code Standard	Staffing Above (+) or Below (-) Education Code Standard
Vision and Orientation and Mobility Specialists	1.80	47	26.11	1-to-10-30	4.70 FTE (to meet 1-to-10) 1.56 FTE (to meet 1-to-30)	Within industry standard range

Sources: District-provided data and industry standards.

Note: Only students receiving direct services from a vision or orientation mobility specialist were included in the total caseload and related calculations.

As shown in the table, the district is staffed within the industry standard range for vision and orientation and mobility specialists.

Recommendations

The district should:

1. Annually review staffing for all related service providers to determine whether it aligns with industry standards and meets student needs.
2. Determine whether its current APE teacher staffing is adequate to meet student needs.
3. Determine whether its current credentialed school nurse staffing is adequate to meet student needs.
4. Determine whether it may reduce the number of occupational therapists and still meet student needs.
5. Determine whether its current SLP staffing is adequate to meet student needs.
6. Perform a cost-benefit analysis of hiring district versus contracted SLPs and determine whether changes in compensation as well as additional incentives for recruitment and/or retention may allow the district to hire more of its own SLPs.

Professional Learning Plan

The Policy Analysis for California Education (PACE) recently published a practice brief titled, "How Districts Scale Instructional Improvement That Lasts." This brief states, "Senior leaders must exercise their authority to deprioritize some things so that the organization can align around a few ongoing, critical goals. 'When everything is a priority, nothing is a priority' is a common saying, and its intuitive truth is easy to see." This PACE brief identifies common pitfalls and highlights the importance of district systems and the pivotal role district leaders need to play in successfully implementing improvement initiatives consistently across district schools. Accordingly, the district needs to consider the recommendations in this brief when developing its professional learning plan.

Training for Teachers

A district's professional learning plan for instructional staff should consider the needs of students with disabilities and align with evidence-based practices, such as multi-tiered systems of support (MTSS), as outlined in the 2015 report on one system described in the "Background and Context — Transforming Education to Improve Outcomes for Students with Disabilities" section of this report. This alignment is essential to improve support for all students, including those with disabilities.

As the district continues its work to encourage inclusive learning environments, instructional staff need to use Universal Design for Learning (UDL) as both a framework and a lens. Training in the use of the UDL framework is crucial for supporting best first instruction, which are Tier 1 instructional strategies that are directly linked to higher levels of student learning. The UDL approach recognizes that every student has individual learning differences and encourages flexibility in how students access and engage in the curriculum and how they demonstrate they have met a learning objective. Effectively serving students with disabilities as general education students first requires active consideration and planning for how they will access, engage, and demonstrate student learning during lesson design.

Using UDL as a lens requires a mindset that prioritizes increased flexibility, choice and relevance. Prior to providing training in UDL, the best practice is to address the critical changes in thinking required to achieve a more inclusive education system for students with disabilities. During interviews, many staff reported that the number of general education classes using co-teaching, which is a collaborative instructional model in which a general education teacher and a special education teacher work together in a general education classroom to support all students, has increased across district schools. However, staff reported that some teachers at certain schools do not believe that all teachers share a collective responsibility to support the success of every student and would prefer more students with disabilities be educated in SDCs. Staff reported the district has provided training in inclusive practices, but continued training in this area appears necessary to continue to foster a mindset that students with disabilities can be successfully included in general education settings prior to providing training on how to do so through UDL. Ensuring staff have adequate training to support students in general education settings prevents inappropriate identification of students for special education and facilitates students having access to their least restrictive environment (LRE).

Training for Special Education Instructional Aides

Special education instructional aides should receive training in nonviolent crisis intervention according to recertification requirements and regular training on student support strategies throughout the school year. Staff reported that nonviolent crisis intervention training is offered to special education instructional aides. Staff reported that special education instructional aides participate in mandated training and have additional training (depending on which program or school they support) during nonstudent workdays or on early release days. Despite this, most staff members indicated that special education instructional aides would benefit from additional training addressing:

- Disability awareness.
- Behavior intervention training.
- Differentiation strategies.
- Providing accommodations and modifications.
- Inclusive practices.

Training for Administrative Designees

Education Code 56341(b)(4) requires a school district representative who is qualified to provide or supervise the provision of specialized instruction and is knowledgeable about the general curriculum and the district's resources to attend IEP meetings. This IEP team member is commonly called the "administrative designee." As mentioned in the "District and Special Education Program Organization" section of this report, the district is moving to a more decentralized model of support for its special education program. Accordingly, district staff serving as administrative designees at IEP meetings and other school leaders should receive annual training addressing at least the following:

- Roles and responsibilities of IEP team members.
- Eligibility determination process for special education.
- Student exit procedures from special education.
- Components of a procedurally compliant IEP and IEP meeting.
- IEP development process for provision of FAPE in the LRE.
- Common reasons for conflict at IEP meetings and strategies to reduce conflict.
- How to respond to unexpected requests during IEP meetings.
- How to follow up if a parent does not consent to the IEP.

Recommendations

The district should:

1. Continue to provide training on inclusive practices.
2. Prioritize professional learning aligned with recommendations in the 2015 report on one system, such as MTSS and UDL, for instructional staff.
3. Continue to provide professional learning for instructional assistants. Consider prioritizing training addressing disability awareness, behavior intervention training, differentiation strategies, providing accommodations and modifications, and inclusive practices.
4. Provide annual training for staff serving as administrative designees at IEP meetings.

Unrestricted General Fund Contribution to Special Education

Fiscal Background

California's special education funding structure was established by and is commonly referred to as Assembly Bill (AB) 602 (Chapter 854, Statutes of 1997), which became effective during the 1998-99 fiscal year.

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

In addition to AB 602 state funding, districts receive a small amount of federal funds. These funds are designed to supplement the general education program, not to support a stand-alone program.

The combined state and federal funds are insufficient to pay for even the most efficient special education programs. Districts make contributions to special education from local resources generated by all students, including those in special education. These contributions are the amount of funding districts must transfer from their unrestricted general funds to pay for the portion of special education costs that exceeds program revenues.

Federal law requires districts to spend at least the same amount of state and local funds on special education services in each successive year. This is commonly referred to as the maintenance of effort (MOE). This requirement has limited exemptions, and if a district is considering reductions to its total general fund contribution to special education, it is required to follow the guidelines in the IDEA (20 USC 1413 (a)(2)(B)), which lists the following circumstances as exceptions that allow a district to reduce the amount of state and local funds it spends on special education:

i. Voluntary departure, by retirement or otherwise, or departure for just cause, of special education or related services personnel;
ii. A decrease in the enrollment of children with disabilities;
iii. 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 to the child has terminated; or
    c. No longer needs the program of special education; or
iv. The termination of costly expenditures for long-term purchases, such as the acquisition of equipment or the construction of school facilities.

The year-end expenditures charged to special education goal codes in the SACS, which is the state's financial reporting format, and allocated expenses in the Program Cost Report are used to calculate special education MOE. Districts need to monitor their MOE throughout the year and analyze forecasts of MOE calculations at first and second interim financial reporting periods. Districts should be mindful of what expenses are charged to special education SACS goal codes, including for nonspecial education SACS resource codes, because those may increase the MOE.

In addition, districts should monitor reductions in expenditures to determine if any meet one of the exceptions that may allow the district to reduce the amount of state and local funds it spends on special education.

Building Comparable Data

Resource codes in the SACS are used to identify revenues and expenditures that have specific accounting or reporting requirements or that are legally restricted. Special education SACS resource codes are used to record special education spending and therefore contain vital information about a district's unrestricted general fund contribution to its special education program.

The special education financial reporting methods used by districts, county offices of education and SELPAs can vary. For example, Grossmont Union excluded most special education transportation expenses and included most legal expenses, while other districts may exclude or include these expenses. There are also differences in how special education funds are allocated by SELPAs and what expenses are paid by the SELPA to support district students. Because of these differences, it is not always possible to accurately compare a district's unrestricted general fund contribution to those of other districts. However, a district should evaluate a contribution that is excessive compared to other districts or that is increasing disproportionately compared to other costs.

To calculate an unrestricted general fund contribution amount that can be compared year to year and includes expenditures most districts classify as special education, FCMAT made the following adjustments to the district's SACS data:

- **One-Time Funds Adjustments:** To improve multiyear continuity, FCMAT used only ongoing special education income. FCMAT removed one-time funding posted in SACS totaling $6,515,109 in 2021-22, $2,252,036 in 2022-23, $4,721,699 in 2023-24, $2,195,287 in 2024-25 and $1,963,970 in the budget for 2025-26. It appears that special education expenditures charged to these one-time state and federal income sources were ongoing and were budgeted by the district as such beginning in 2024-25.
- **Special Education Transportation Adjustments**: Special education transportation costs were reported as $5,496,281 in 2021-22, $8,880,881 in 2022-23, $2,190,730 in 2023-24, $32,200 in 2024-25 and $25,000 in the budget for 2025-26. The district reported it does not have contracts with any external transportation providers but does have certain parents who are paid for transporting their own student in lieu of district provided transportation. In addition, no transportation expenses are included in the nonpublic schools (NPS) expenses. Since the district modified the way transportation expenses were coded in SACS over the review period, transportation expenses were not included in this analysis.
- **Indirect Cost Adjustments:** Although the district charges few indirect costs, full indirect costs have been charged to all special education programs using the CDE's approved rates for all the comparison years. The best practice is to charge the full indirect rate to all programs, including those without special education SACS resource codes, so that the true cost of the special education program can be determined.

District Special Education Expenses

FCMAT analyzed the district's special education income and expenditures, using only ongoing income from fiscal years 2022-23 to 2025-26, as shown in Table 23 below. As described in the "Building Comparable Data" section, FCMAT omitted district transportation expenses. In addition, FCMAT excluded California

State Teachers' Retirement System (CalSTRS) on-behalf payments, which are the state of California's required contributions to CalSTRS that are made on behalf of school districts and that districts must record in their financial statements. Data from 2021-22 was used as the base for calculating the percent change in the "Historical 2022-23" column.

Table 23. Comparison of Adjusted Special Education Expenses Using Ongoing Income Only, 2022-23 to 2025-26

Category	Adjusted Historical 2022-23	Adjusted Historical 2023-24	Adjusted Historical 2024-25	Budget 2025-26	Average Historical Annual Rate
Increase/Decrease in Special Education Students	-1.0%	1.9%	2.8%	N/A	1.2%
Increase/Decrease in Ongoing Income	14.3%	-5.8%	-5.0%	-1.7%	2.7%
Increase/Decrease in Certificated Salaries	2.9%	11.8%	-0.5%	5.5%	4.7%
Increase/Decrease in Classified Salaries	3.4%	8.8%	-4.4%	18.0%	2.6%
Increase in Benefits	9.2%	10.3%	0.4%	14.1%	6.6%
Increase/Decrease in Books and Supplies	0.9%	-21.6%	-4.2%	62.6%	-8.3%
Increase/Decrease in Services	30.3%	34.1%	21.0%	-31.8	28.5%
Increase/Decrease in Capital Expenses	731.4%	-82.5%	46.9%	-100.0%	231.9%
Increase/Decrease in Other Tuition	-43.2%	122.3%	-67.6%	158.4%	3.8%
Increase in Adjusted General Fund Contribution	4.9%	29.0%	3.9%	2.6%	12.6%
Adjusted Dollar Amount of General Fund Contribution	$46,257,046	$48,537,818	$62,592,442	$65,014,437	N/A
Adjusted Dollar Amount of Special Education Expenses	$70,052,691	$75,741,920	$88,218,971	$90,509,420	N/A

Sources: Official SACS unaudited actuals, 2025-26 budget as of January 30, 2026, and Enrollment Multi-Year Summary for Charter and Non-Charter Schools - Grossmont Union.

Notes: Official SACS data were adjusted as described in the "Building Comparative Data" section of this report.

The "Adjusted Dollar Amount of Special Education Expenses" and "Adjusted Dollar Amount of General Fund Contribution" categories were adjusted to match footnoted entries in the district's budget.

Special Education Funding and Expenses

During the review period, the number of students identified for special education increased by an average of 1.2% per year, and adjusted expenses increased by approximately 9.1% per year. The district's ongoing special education funding over the review period increased by an average of 2.7% per year. In 2025-26, the district is projecting a 1.8% decrease in special education income, but the district did not provide an updated estimate of the SELPA's current year budget. The California Department of Education funding exhibits as of February 2026 show an increase of 1.4% in East County SELPA growth as well as the 1.0107% cost-of-living adjustment (COLA). Therefore, the district's 2025-26 income from the East County SELPA may be understated by approximately $500,000.

Staffing Costs

From 2021-22 to 2024-25, certificated special education staffing and salaries rose by 4.7% beyond negotiated raises and step-and-column changes, primarily due to adding more program options, program specialists, and teachers on special assignment. Classified special education salaries rose by 2.6%, below the rate of growth associated with negotiated raises and step-and-column changes.

In its 2025-26 budget, the district projects a 5.5% increase in certificated special education staffing costs and an 18.0% increase in classified staffing costs. Staff explained these increases were based primarily on the assumption that the district would hire more of its own employees and reduce contracted services, which does not appear to have happened. As a result, certificated staffing appears to be overbudgeted by approximately $400,000 (excluding benefits), and classified staffing appears to be overbudgeted by approximately $2.6 million (excluding benefits). FCMAT estimated the overbudgeted amounts using a ratio comparing the 2025-26 second interim actuals to the 2022-23, 2023-24, and 2024-25 second interim unaudited actuals.

Cost of Supplies

From 2021-22 to 2024-25 the cost of supplies decreased by an average of 8.3% per year. The 2025-26 budget is 62.6% higher than the prior year due to the large prior year reductions. This expense appears to be approximately $500,000 overbudgeted. FCMAT estimated the overbudgeted amounts using a ratio comparing the 2025-26 second interim actuals to the 2022-23, 2023-24, and 2024-25 second interim unaudited actuals.

Cost of Services

From 2021-22 to 2024-25, contracted service costs (excluding transportation) rose by an average of 28.5% per year. This increase was primarily due to increased costs of NPS and residential treatment center (RTC) placements and consultants. The district's 2025-26 budget projects a 31.8% decline in service costs and appears to be approximately $10.8 million below the budget necessary for the year. However, approximately $5.8 million of that shortfall may be offset by overbudgeting in salaries, benefits, and books and supplies.

According to DataQuest and district CALPADS data, the number of district students attending an NPS or RTC increased by nine students between 2022-23 and 2025-26, as shown in Table 24 below.

Table 24. District NPS and RTC Enrollment and Expenditures, 2022-23 through 2025-26

	2022-23	2023-24	2024-25	2025-26
Number of Students (DataQuest)	63	67	75	72
District Expenditures	$5,000,647	$6,707,074	$7,361,799	N/A

Sources: District-provided data and Enrollment for Charter and Non-Charter Schools - Grossmont Union High School District (CDE).

The district budgeted for a 31.8% decrease for student services in 2025-26. FCMAT analyzed actual NPS expenses and found the average cost per student over the last two years was $99,131. The average cost per student decreased by 1.9% between 2023-24 and 2024-25, which is probably contributing to the shortfall in the services budget.

District Unrestricted General Fund Contribution

The district's adjusted unrestricted general fund contributions, excluding transportation and CalSTRS on-behalf payments, reductions for one-time income, and including expenditures for full indirect costs are shown in Table 25 below.

Table 25. District's Adjusted Unrestricted General Fund Contributions to Special Education (Excluding Transportation), 2021-22 through 2024-25

Category	2021-22	2022-23	2023-24	2024-25
Adjusted Unrestricted General Fund Contribution	$46,257,046	$48,537,818	$62,592,442	$65,014,437
Percentage of Adjusted Special Education Costs	66.0%	64.1%	71.0%	71.8%

Sources: Official SACS unaudited actuals.

Note: Official SACS data were adjusted as described in the "Building Comparative Data" section of this report.

In 2025-26, based on the second interim budget, the district's unrestricted general fund is estimated to be 72.7% of adjusted special education costs. Since 2021-22, costs for salaries, benefits, NPS placements, and NPA services have risen significantly, while special education income has not kept pace.

Recommendations

The district should:

1. Continue to monitor its unrestricted general fund contribution to the special education program.
2. Disaggregate, monitor and track special education NPA, NPS and RTC costs separately in SACS, and annually analyze trend data to use for budgeting.
3. Conservatively budget for increases in NPA, NPS, and transportation service expenditures. Compare year-to-date actual to budgeted expenditures at the interim reporting periods and adjust the budget accordingly.
4. Ensure that any reductions in budgeted expenses are supported with programmatic explanations.

Appendix

A. Study Agreement

FCMAT

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
FOR MANAGEMENT ASSISTANCE

This study agreement, hereinafter referred to as Agreement, is made and entered into by and between the Fiscal Crisis and Management Assistance Team, hereinafter referred to as the Team or FCMAT, and the Grossmont Union High School District, hereinafter referred to as the Client; collectively, FCMAT and Client are hereinafter referred to as the Parties. This Agreement shall become effective from the date of execution hereof by FCMAT.

1. **BASIS OF AGREEMENT**

   FCMAT provides a variety of services to local education agencies (LEAs) as authorized by Education Code (EC) 42127.8(d). The Client has requested that the FCMAT assign professionals to study specific aspects of the Client's operations. The professionals will include FCMAT staff and may include professionals from county offices of education, school districts, charter schools, community colleges, other public agencies or private contractors. All professionals assigned shall work under the direction of FCMAT. All work shall be performed in accordance with the terms and conditions of this Agreement.

   FCMAT will notify the Client's county superintendent of schools of this Agreement.

2. **SCOPE OF THE WORK**

   A. Scope and Objectives of the Study

   1. Analyze special education teacher staffing ratios, class sizes and caseloads using statutory requirements for mandated services and statewide guidelines, and make recommendations for improvement, if any.

   2. 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 considerations related to the least restrictive environment and the processes for monitoring the assignment of paraeducators and determining the need for continued support from year to year (including classroom and 1-to-1 paraeducators).

   3. Analyze staffing and caseloads for related service providers, including but not limited to speech pathologists, psychologists, occupational/physical therapists, adapted physical education teachers and other staff who may be related service providers, and make recommendations for improvement, if any.

   4. Review the Special Education Department's organizational structure and staffing in the district's central office to determine whether its administration, clerical and administrative support, program specialists, teachers on special assignment and overall function are aligned with those of districts of comparable size and structure, and make recommendations for greater efficiencies, if any.

   5. Review the district's professional development/training program as it relates to

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special education, and make recommendations for improvement, if any.

6. 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 Client's location to brief the Client's management and supervisory personnel on the Team's procedures and the purpose and schedule of the study. This orientation meeting is normally held at the beginning of fieldwork for the study.

2. Fieldwork
The Team will conduct fieldwork at the Client's office and/or school site(s), or other locations as needed. Limited fieldwork may also be conducted remotely via telephone or videoconferencing services, in addition to the Public Safety Considerations outlined in Section 13 below.

3. Exit Meeting
The Team will hold an exit meeting at the conclusion of the fieldwork to inform the Client of the status of the study. The exit meeting will include a review of the scope of work; outstanding items, including documents, data and interviews not yet received or held; and the estimated timeline for a draft report. The meeting will not memorialize details regarding findings because the Team's conclusions may change after a complete analysis is finished. Exceptions to this will be findings of immediate health and safety concerns for students or staff, and other time-sensitive items that include the potential for risk or exposure to loss.

4. Exit Letter
Approximately 10 business days after the exit meeting, the Team will issue an exit letter briefly memorializing the topics discussed in the exit meeting.

5. Draft Report
An electronic copy of a preliminary draft report will be delivered to the Client's point of contact identified below for review and comment.

6. Final Report
An electronic copy of the final report will be delivered to the Client's point of contact and to the Client's county superintendent of schools following completion of the study. FCMAT's work products are public, and all final reports are published on the FCMAT website.

7. Board Presentation
Presentations to the Client's board are optional and are made at the request of the Client. If a board presentation is requested, it will be noted in the scope and objectives of the study or can be added as a change in scope at a later date.

8. Follow-Up Review

If requested by the Client within six to 12 months after completion of the study, FCMAT, at no additional cost, will assess the Client's progress in implementing the recommendations included in the report. This follow-up support is primarily a document review-based study. Progress in implementing the recommendations will be documented to the Client in a FCMAT management letter. FCMAT will work with the Client on a mutually convenient time to return for follow-up support that is no sooner than eight months and no later than 18 months after the date of the final report.

3. PROJECT PERSONNEL

The personnel assigned to the study will be led by a FCMAT staff person (job lead) and will include at least one other professional. FCMAT will notify the Client of the assigned personnel when the fully executed copy of this Agreement is returned to the Client.

FCMAT will communicate to the Client any changes in assigned project personnel.

4. PROJECT COSTS

The cost for studies requested pursuant to EC 42127.8(d)(1) and 84041 shall be as follows:

A. $1,200 per day for each FCMAT staff member while on site conducting fieldwork. The cost of independent FCMAT consultants will be billed at their daily rate for all work performed. On-site is defined as either 1) physically at the Client's office or school site(s), or 2) in a scheduled virtual meeting with the Client's personnel, representatives or others associated with the scope of work pursuant to Section 13 below.

B. All out-of-pocket expenses, including travel and its associated costs, and miscellaneous items necessary to complete the scope and objectives of the study.

C. The applicable indirect rate at the time work is performed on the study will be added to all costs billed.

D. The Client will be invoiced for 50% of the not-to-exceed cost shown below following completion of fieldwork (progress payment) and the remaining amount shall be due upon the issuance of the final report or presentation to the Client's board, whichever is later (final payment). The Parties agree that changes documented in a revised study agreement may change the original not-to-exceed amount shown below. If changes are made before or during fieldwork, the new not-to-exceed amount documented in such a revised study agreement will constitute the basis for the progress payment. If changes are made after fieldwork, 100% of the total changed value documented in a revised study agreement, less progress payments made, will constitute the final payment due. All payments shall be due immediately based on the terms of the invoice.

Based on the scope and objectives of the study, the total not-to-exceed cost of the study will be $24,000.

E. Any change to the scope of work will affect the total cost. Changes may include, but are not limited to, delays, revisions to the scope of services, and substitution or addition of personnel. The need for changes shall be communicated by FCMAT to the Client in advance in the form of a revised study agreement.

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

5. **RESPONSIBILITIES OF THE CLIENT**

A. Return current organizational chart(s) that show the Client's management and staffing structure with the signed copy of this Agreement. Organizational charts should be relevant to the scope of this Agreement.

B. Provide private office or conference room space for the Team's use during fieldwork.

C. Provide for a Client employee to upload all requested documents and data to FCMAT's online SharePoint repository per FCMAT's instructions. Provide FCMAT with the name and email of the person who will be responsible for collecting and uploading documents requested by FCMAT with the signed copy of this Agreement.

D. Provide documents and data requested on the Team's initial and supplementary document request list(s) by the date requested.

All documents and data provided shall be responsive to FCMAT's request, in quality condition, readable and in a usable form. With few exceptions, documents and data requested are public records and records maintained by LEAs in the routine course of doing business. Some data requested may require exporting LEA financial system reports to Microsoft Excel or another usable format agreed to by FCMAT.

All documents shall be provided to FCMAT in electronic format, labeled as instructed by FCMAT. Upon approval of this Agreement, access will be provided to FCMAT's online SharePoint repository, to which the Client will upload all requested documents and data.

E. Ensure appropriate senior-level staff are available for the orientation and exit meetings.

F. Facilitate access to requested board members, officers and staff for interviews.

G. Facilitate access to requested information and facilities to include, but not be limited to, files, sites, classrooms and operational areas for observation.

H. Review a draft of the report and return it to FCMAT by the date FCMAT requests with any comments regarding the accuracy of the report's data or the practicability of its recommendations. The Team will review this feedback in a timely manner and make any adjustments it deems necessary before issuing the final report.

I. Return the requested evaluation survey to FCMAT as described below.

6. **PROJECT SCHEDULE**

Time is of the essence. The Parties acknowledge that the goal of the scope and objectives of the study under this Agreement is to produce a timely and thorough report that adds value for the Client. To accomplish this goal, the Parties agree to communicate and mutually agree to honor established time commitments. These commitments include the Client providing requested documents, setting and keeping interview appointments and returning comments on the draft report consistent with the established project schedule.

The following project schedule milestones will be established by FCMAT upon receipt of a signed Agreement from the Client:

ACTION	TIMELINE
FCMAT provides the Client with a draft Agreement.	Draft Agreements are usually provided within 20 business days of the Client's initial request for services.
Client returns partially executed Agreement to FCMAT along with the applicable organizational chart and the name and email of the of person who will be responsible for collecting and uploading documents requested by FCMAT.	Draft Agreements are valid for 30 business days.
FCMAT returns a fully executed Agreement to the Client and identifies the project schedule and the lead and other personnel assigned to the job.	Within five business days of the Client's return of the signed Agreement.
Client uploads initial requested documents and data to FCMAT's online SharePoint repository.	Within 10 business days of the Client's receipt of the FCMAT document and data request list.
Fieldwork	Mutually agreed upon; usually, to commence within 10 business days of FCMAT's receipt of requested documents and data.
Orientation meeting	First day of fieldwork.
Exit meeting	Last day of fieldwork.
Follow up fieldwork, if needed (e.g., rescheduled interview, additional interviews).	Mutually agreed upon; usually, within five business days of FCMAT's request.
Client uploads supplemental documents and data to FCMAT's online SharePoint repository.	Within two business days of the Client's receipt of FCMAT's supplemental document and data request(s).
Draft report submitted to the Client.	To be determined, usually, within eight weeks of the conclusion of fieldwork and receipt of all documents and data requested.
Client comments on draft report	Within 10 business days of FCMAT providing a draft report to the Client.

The Client acknowledges that project schedule deadlines build upon and are contingent on each previous deadline. Missed deadline dates will affect future deadline dates and ultimately the timing of the final report. For example, if the Client does not provide requested documents and data by the specified date, the fieldwork may not be able to proceed as originally planned.

FCMAT acknowledges that the Client has an educational program to administer, is balancing many priorities, and in some cases may have records management difficulties, staffing capacity issues, staff on various types of leave, or other circumstances, all of which will affect the project schedule.

The Parties commit to regular communication and updates about the study schedule and work progress. FCMAT may modify the usual timelines as needed.

7. **COMMENCEMENT, TERMINATION AND COMPLETION OF WORK**

FCMAT will commence work as soon as it has assembled an available and appropriate study team, taking into consideration other jobs FCMAT has previously undertaken, assignments from the state, and higher priority assignments due to fiscal distress. The Team will work expeditiously to complete its work and deliver its report, subject to the cooperation of the Client and any other related 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 report. In the absence of extraordinary circumstances, FCMAT will not withhold preparation, publication and distribution of a final report once fieldwork has been completed.

Prior to completion of fieldwork and upon written notice to FCMAT, the Client 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 Client does not provide written notice of termination prior to completion of fieldwork, the Team will complete its work and deliver its final report and the Client will be responsible for the full costs.

FCMAT may terminate this Agreement at any time if the Client fails to cooperate with the requested project schedule, provide requested documents and data and/or make staff available for interviews as requested by FCMAT.

8. **INDEPENDENT CONTRACTOR**

FCMAT is an independent contractor and is not an employee or engaged in any manner with the Client. 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 Client in any manner without prior express written authorization from an officer of the Client.

9. **RECORDS**

The Client understands and agrees that FCMAT is a state agency and all FCMAT reports are public records and are published on the FCMAT website. Supporting documents and data in FCMAT's possession may also be public records and will be made available in accordance with the provisions of the California Public Records Act.

FCMAT has a records retention policy and practice, and every effort will be made to maintain records related to this Agreement in accordance with this policy.

10. CONTACT WITH PUPILS

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

11. 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 Client, automobile liability insurance in the amount required by California state law, and workers' compensation as required by California state law. Upon the request of the Client and receipt of the signed Agreement, FCMAT shall provide certificates of insurance, with the Client named as additional insured, indicating applicable insurance coverages.

12. HOLD HARMLESS

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

13. PUBLIC SAFETY CONSIDERATIONS

Whether due to public health considerations, extreme weather conditions, road closures, other travel restrictions or interruptions, shelter-at-home orders, LEA closures or other related considerations, at FCMAT's sole discretion, the Scope of Work, Project Costs, Responsibilities of the Client, and Project Schedule (Sections 2, 4, 5 and 6 herein) and other provisions herein may be revised. Examples of such revisions may include, but not be limited to, the following:

A. Orientation and exit meetings, interviews and other information-gathering activities may be conducted remotely via telephone, videoconferencing, or other means. References to fieldwork shall be interpreted appropriately given the circumstances.

B. Activities performed remotely that are normally performed in the field shall be billed hourly as if performed in the field (excluding out-of-pocket costs that can otherwise be avoided).

C. The Client may be relieved of its duty to provide conference and other work area facilities for the Team.

14. FORCE MAJEURE

Neither party will be liable for any failure or delay in the performance of this Agreement due to causes beyond the reasonable control of the party, except for payment obligations by the Client.

15. EVALUATION

In the interest of continuous improvement, FCMAT will provide the Client with an evaluation survey at the conclusion of the services. FCMAT appreciates the Client's honest assessment of the Team's services and process. The Client shall return the evaluation survey within 10 business days of receipt.

16. CLIENT CONTACT PERSON

The Client's contact person designated below shall be the primary contact person for FCMAT to use in communicating with the Client on matters related to this Agreement. At any time when this Agreement or FCMAT's process requires that FCMAT send information, document request lists, draft report or final report, or when FCMAT makes other requests for the Client to act upon, this is the person whom FCMAT will contact. The Client may change the contact person upon written notice to FCMAT's job lead assigned to the study.

Name: Paul Dautremont, Assistant Superintendent, Educational Services

Telephone: (619) 644-8041

Email: pdautrem@guhsd.net

17. SIGNATURES

Each individual executing this Agreement on behalf of a party hereto represents and warrants that he or she is duly authorized by all necessary and appropriate action to execute this Agreement on behalf of such party and does so with full legal authority.

For Client:

Paul Dautremont 12/15/25

Paul Dautremont
Assistant Superintendent, Educational Services
Grossmont Union High School District

Date

For FCMAT:

Michael H. Fine

Digitally signed by Michael H. Fine
Date: 2025.12.18 09:08:55 -08'00'

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

Date