

FCMAT

FISCAL CRISIS & MANAGEMENT
ASSISTANCE TEAM

Special Education Review

February 11, 2026



Lennox School District

Michael H. Fine
Chief Executive Officer

February 11, 2026

Gabriela L. Tavitian, Superintendent
Lennox School District
10319 Firmona Ave.
Lennox, CA 90304

Dear Superintendent Tavitian:

In May 2025, the Lennox 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 program. The agreement stated that FCMAT would perform the following:

1. Review the district's implementation of student success teams, response to instruction and intervention, and multitiered system of supports, and make recommendations for improvement, if any.
2. 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.
3. Review the efficiency of staffing allocations of special education paraeducators, per Education Code requirements and/or industry standards, and make recommendations for improvement, if any. Review the procedures for identifying the need for paraeducators, including 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).
4. 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.
5. Determine whether the district overidentifies students for special education services compared to the statewide and countywide averages, and make recommendations for reducing overidentification, if needed.
6. 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.
7. Review the costs of due process activities, mediations and settlements for the past three years and make recommendations for improvements, if any.

8. Review the district's professional development/training program as it relates to special education, and make recommendations for improvement, if any.
9. Review the district's structure of the co-teaching inclusion model. Interview district and school site staff to better understand their perspective on the model. Make recommendations to the district, providing guidance on a process that can be used if they decide to use an alternative model to meet the needs of its students with disabilities.
10. Review the district's unrestricted general fund contribution to special education and make recommendations for greater efficiency, if any.
11. Review special education transportation for efficiency and effectiveness, and provide recommendations for potential cost savings measures, if any. The review will include but not be limited to the role of individualized education programs, routing, scheduling, operations and staffing.
12. The Team will present the final report to the district's governing board at a public meeting following the completion of the review.

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael H. Fine". The signature is fluid and cursive, with a large, stylized "M" and "F".

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 Los Angeles County, the Lennox School District serves students in transitional kindergarten through grade 8 (TK-8) across a preschool, five elementary schools and a middle school. According to [DataQuest](#), 3,941 TK-8 students were enrolled in noncharter schools in 2024-25.

The district is a member of the Southwest 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 2024-25, 17.15% of the district's students were identified as requiring special education ([DataQuest](#)).

In May 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 program.

Study and Report Guidelines

FCMAT visited the district on October 29-30, 2025, to conduct interviews with central office and school administrators, special education teachers, related service providers, special education instructional assistants, 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.

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

Tim Purvis
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 Lennox School District's census day enrollment has declined over the past five years, while special education enrollment has increased. During this period, the share of transitional kindergarten through grade 8 (TK-8) students enrolled in special education increased by 4.85 percentage points. In 2024-25, 17.15% of TK-8 students were identified as requiring special education, a rate significantly higher than that of Los Angeles County or the state. English learners are overrepresented in the district's special education program. Identifying students for special education when they do not require specialized instruction is not a best practice because it increases special education costs and may limit access to rigorous general education instruction, reduce interactions with their peers without disabilities, and contribute to stigma.

The district's identification of students for special education is influenced by its implementation of student study teams (SSTs), multitiered systems of support (MTSS), and its eligibility determination process for special education, which is discussed further in the "Factors Influencing Special Education Identification" section of this report.

Special Education Staffing

Central Office

The district has 0.67 more full time equivalent (FTE) administrator/leadership positions and 0.25 FTE more administrative support positions facilitating the special education program compared to the surveyed school districts.

Specialized Academic Instruction Teachers

The district employs education specialists, called specialized academic instruction (SAI) teachers, who support students with mild-to-moderate support needs. In 2025-26, the districtwide SAI teacher staffing is within the industry standard range for SAI-based programs supporting students in their least restrictive environment (LRE). SAI teacher staffing for the middle school meets the Education Code standard for resource specialists but is below the industry standard range for SAI-based programs supporting students in their LRE. The district needs to evaluate whether adding SAI teacher staffing at the middle school level would allow for it to provide better service to students.

Special Day Class Programs

In 2025-26, the districtwide mild-to-moderate special day class (SDC) teacher staffing was above the industry standard range. Staff reported the district does not have enough SDCs for students with moderate and extensive support needs, and places certain students with those needs in mild-to-moderate SDCs. This may mean the district cannot place as many students in these classes and may cause the district's mild-to-moderate SDC teacher staffing to be higher than the industry standard range. The district needs to evaluate how it can better group its students with IEPs into SDCs based on their support needs. This will also ensure students are taught by a teacher who is credentialed to address their support needs.

As described in the “School-age Least Restrictive Environment” section of this report, all but two of the district’s SDCs for elementary-aged students are located at Felton Elementary. While the Individuals with Disabilities Education Act (IDEA) does not define LRE as a student’s neighborhood school, ideally, students enrolled in an SDC would be able to attend the same school as their siblings and peers without disabilities from their neighborhood, which is not the case in this district. In addition, the district may be increasing its transportation costs since it provides transportation to all students who are not attending their neighborhood school. The district needs to perform a cost-benefit analysis to evaluate the financial and nonfinancial advantages and disadvantages of dispersing its SDCs across more of its elementary school campuses.

Special Education Instructional Assistants

The districtwide instructional assistant staffing for its SDCs appears to be higher than the industry standards. However, since the district does not differentiate most of its SDCs based on student support needs (mild-to-moderate versus extensive), it is difficult to say whether the district’s instructional assistant staffing is higher than necessary to support student needs because the composition of students in the comparison SDCs may have had different student support needs. The district needs to evaluate whether use of an adult-to-student ratio to determine instructional assistant staffing for its SDCs, and differentiating its SDCs by student support need, would allow it to better determine the number of instructional assistants necessary to meet student needs.

Related Service Providers

The district is staffed below the industry standard for credentialed school nurses, and it needs to evaluate whether staffing for credentialed school nurses needs to increase.

The district’s speech and language pathologist (SLP) staffing is approximately equal to the Education Code maximum, and the district needs to evaluate whether it needs to increase SLP staffing. The district contracts with nonpublic agencies (NPAs) for 58% of its SLPs and needs to perform a cost-benefit analysis to determine whether hiring more of its own SLPs would be more cost-effective than continuing to contract for these positions.

Unrestricted General Fund Contribution to Special Education

Since 2022-23, the district has incurred significant increased costs related to nonpublic school (NPS) placements and increased NPA service costs, while special education income has not changed. In 2024-25, the district’s adjusted unrestricted general fund contribution to special education was \$11,076,500, or 69.4% of total special education costs. In 2025-26, the district’s estimated unrestricted general fund contribution (using full indirect costs, adjusted expenditures, reduced by one-time income, and not including transportation) is estimated to be 71.2% of adjusted special education costs. This percentage does not include the addition of \$1,086,000 for NPS services that FCMAT believes will need to be added to the 2025-26 budget.

Transportation

In 2025-26, the district has 48 students who received transportation as a related service in their individualized education program (IEP). The district’s internal transportation program serves 87.5% of these students with an average ridership of seven students per vehicle per run, achieving nearly 100% utilization of the district’s nine-passenger alternative passenger vehicles. The district is using its alternative passenger vehicles efficiently.

As described in the “Transportation Program Leadership and Staffing” section of this report, the district’s Special Education Department provides administrative support to the transportation program and the director of facilities and maintenance oversees the daily operations. This arrangement is not what is typically observed in districts this size across the state and creates operational limitations. The district needs to evaluate whether assigning transportation program leadership to the Business Services Department would be more efficient.

FCMAT found large fluctuations in transportation expenditures reported under Standardized Account Code Structure (SACS) Function Code 3600 over the past four years. It appears that the district significantly improved its tracking of transportation expenditures reported under SACS Function Code 3600 in 2022-23, but then reported expenses decreased significantly in 2024-25 and are projected to decrease again in the 2025-26 budget. This may indicate that the district is not capturing all its transportation expenses under SACS Function Code 3600, which is problematic because the district’s transportation reimbursement is based on 60% of eligible expenditures recorded in this function. Accurately identifying and recording these expenditures will allow the district to determine the true cost of its special education transportation program and maximize its state reimbursement.

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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 than 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 the analysis of the district's Special Education Department and its staffing throughout this report.

District Alignment with the 2015 Report on One System

Consistent with the tenets in the 2015 report on one system, the Special Education Department's website states:

As part of our ongoing commitment to fostering inclusive environments, the Lennox School District ensures that every student, regardless of their abilities or needs, is fully included in all school activities and field trips. Inclusive practices are at the heart of our educational philosophy, and it is essential that we provide equitable opportunities for all students to engage in and benefit from the full range of experiences offered at our school sites. This includes, but is not limited to, academic activities, extracurricular programs, field trips, and school-wide events.

Also consistent with the 2015 report on one system, the director of special education reports to the assistant superintendent of instructional services, who participates in the superintendent's administrative cabi-

net meetings. This structure provides a direct line of communication and ensures that students with disabilities are considered in districtwide planning.

Despite these positive practices, many staff interviewed reported that at certain schools, general education teachers quickly refer students for special education assessments as soon as a learning difference is observed, rather than first implementing accommodations and supports within the general education program, which can lead to unnecessary identification and placement in special education. This issue is discussed further in the “[Factors Influencing Special Education Identification](#)” section of this report. Special education staff also noted that some educators refer to students with disabilities as “special ed kids” and do not understand that all students are general education students, some of whom also receive specialized services, which counters inclusive practices and reinforces stigmas.

The district has developed a CDE Compliance and Improvement Monitoring (CIM) plan to address its significantly lower performance of students with disabilities compared to general education students in English Language Arts (ELA) according to the California Assessment of Student Performance and Progress (CAASPP). According to the district’s CIM plan, students with disabilities scored 87.7 points below standard in ELA performance while nondisabled students scored 25.8 points below standard in 2022 (the baseline data year). The CIM plan identifies professional learning focused on coteaching, providing positive behavioral support and social-emotional learning, and implementing an MTSS as key activities to increase the achievement in ELA of students with disabilities. The district has done significant work in each of these areas. To complement these efforts, FCMAT provides additional recommendations for further building staff capacity, which are outlined in the “[Professional Learning Plan](#)” section of this report.

Recommendations

The district should:

1. Continue to consider the needs of students with disabilities in all districtwide decisions and planning.
2. Continue to implement its CIM and remain focused on improving ELA performance for students with disabilities.

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 2024-25, the district's TK-8 census day (official count of enrolled students on the first Wednesday in October) noncharter school enrollment declined by 790 students, as shown in Figure 1 below.

Figure 1. Census Day Enrollment of District Students in Grades TK-8, 2020-21 – 2024-25

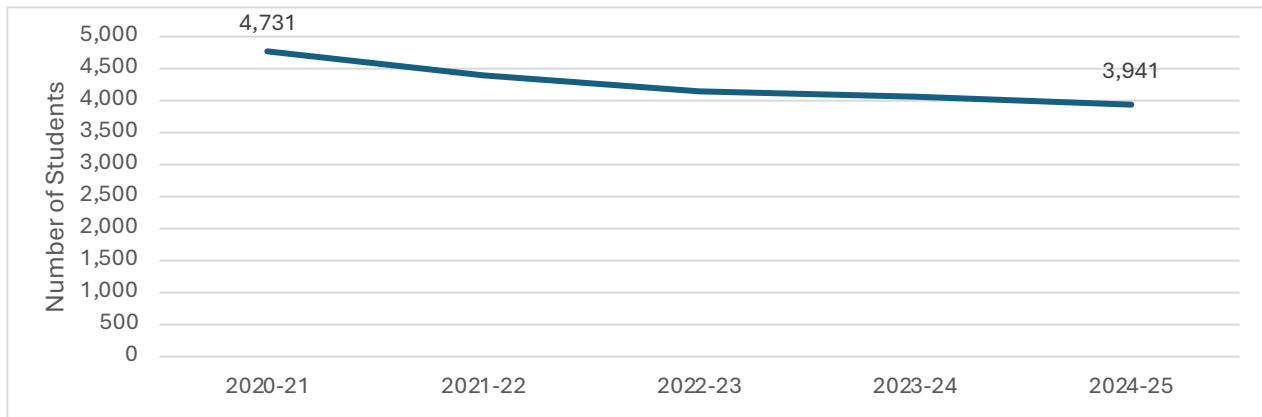


Figure 1. A graph showing that district TK-8 census day non-charter school enrollment declined from 4,731 students in 2020-21 to 3,941 students in 2024-25.

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

Between 2020-21 and 2024-25, the district's census day TK-8 non-charter school special education enrollment increased by 94 students, as shown in Figure 2 below. This increase occurred despite an overall enrollment decline, suggesting a rising identification rate that warrants further review.

Figure 2. District Special Education Enrollment in Grades TK-8, 2020-21 – 2024-25

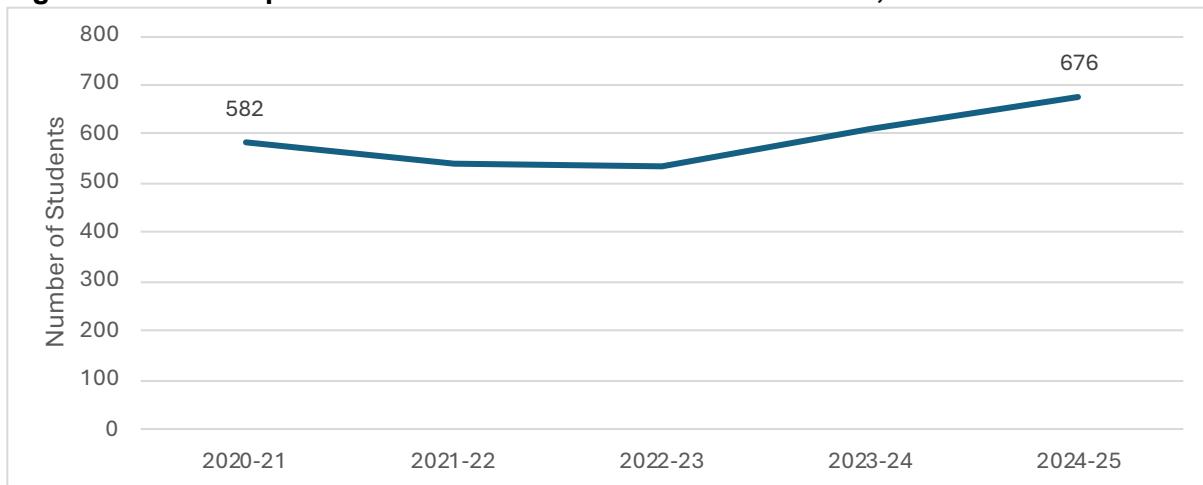


Figure 2. A graph showing that district TK-8 non-charter school special education enrollment increased from 582 students in 2020-21 to 676 students in 2024-25.

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

In 2024-25 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% of all students, they account for 65% of students in special education, which mirrors the 2024-25 statewide average calculated from DataQuest. By contrast, students who identify as female make up 48% of all students but only 35% 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 IDEA defines 14 categories of disability under which a student may be eligible for special education. In 2024-25, approximately 95% of the district's students enrolled in special education qualified under one of the four categories listed in Table 1 below.

Table 1. Percentage of District Special Education Enrollment by Primary Disability Category, 2019-20 and 2024-25

	Autism	Other Health Impairments	Specific Learning Disability	Speech and Language Impairment
2019-20	13.52%	10.00%	39.15%	32.08%
2024-25	20.00%	8.79%	29.79%	36.60%
Percentage Point Difference	6.48	-1.21	-9.36	4.52

Source: California Longitudinal Pupil Achievement Data System (CALPADS) report 16.1 for 2019-20 and CALPADS report 16.12 for 2024-25.

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

From 2019-20 through 2024-25, the number of district students qualifying for special education under the disability category of autism increased from 86 to 141 – an increase of 63.95%, according to California Longitudinal Pupil Achievement Data System (CALPADS) reports. Despite this increase, the district's identification rate for special education under the category of autism in 2024-25 aligns with the statewide trend.

Disproportionality in Special Education Identification

The [National Association of School Psychologists](#) defines 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 2024-25, the representation of each racial and ethnic group in special education was proportionate to its share of the district's overall student population. Table 2 below compares the two groups (students who identify as African American, or Hispanic or Latino) that together accounted for approximately 97% of district enrollment.

Table 2. Percentage of Students in Special Education, by Race and Ethnicity, Compared to Percentage of Total Student Population, 2024-25

	African American	Hispanic or Latino
Percentage of Total Enrollment	1.67%	95.51%
Percentage of Special Education Enrollment	2.37%	95.56%
Difference	0.70	0.05

Source: Enrollment by Ethnicity for Non-Charter Schools in 2024-25 - Lennox School District (CDE).

English Learners in Special Education

According to DataQuest, in 2024-25, English learners represented 39.66% of all district TK-8 students but 56.66% of students in special education. English learners (ELs) are commonly overidentified for special education services, and this may be the case in the district.

WestEd's brief, [Resources and Strategies for Identifying and Supporting English Learners with Learning Disabilities](#), identified two main factors that can lead to inconsistent identification of EL students with learning disabilities:

- A lack of understanding about why EL students are not making adequate progress.
- Poorly designed and implemented referral processes.

The cause of the district's higher-than-expected identification of English learners for special education is unclear. Staff reported that the district has provided training for staff on differentiating language development needs from disability and on special education assessment reports.

District Special Education Enrollment Compared to Countywide and Statewide Enrollment

According to DataQuest, the percentage of district TK-8 students enrolled in special education increased by 4.85 percentage points, from 12.30% in 2020-21 to 17.15% in 2024-25.

FCMAT compared the district's total non-charter TK-8 enrollment and special education enrollment in 2024-25 with countywide and statewide TK-8 figures, as shown in Table 3 below.

Table 3. Comparison of TK-8 Total and Special Education Enrollment, 2024-25

	Lennox	Los Angeles County	California
Grades TK-8 Total Enrollment	3,941	853,134	3,915,918
Grades TK-8 Special Education Enrollment	676	126,815	562,847
Percentage	17.15%	14.86%	14.37%

Sources: Enrollment for Non-Charter Schools - Lennox School District (CDE), Enrollment for Grades TK-8 - Los Angeles County (CDE), and Enrollment for Grades TK-8 - State (CDE).

The district identified a higher percentage of TK-8 students as requiring special education than both Los Angeles County and the state, indicating a systemic issue that could lead to higher costs and reduced access to general education for some students. Possible reasons for the district's higher identification rates are discussed in the "Factors Influencing Special Education Identification" section of this report.

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. Use WestEd's brief *Resources and Strategies for Identifying and Supporting English Learners with Learning Disabilities* as a guide to investigate its higher-than-expected identification of ELs in special education and provide targeted professional learning as necessary.

Factors Influencing Special Education Identification

Education Code (EC) 56303 states, “A pupil shall be referred for special educational instruction and services only after the resources of the regular education program have been considered and, where appropriate, utilized.” Identifying a student for special education before implementing general education interventions does not best serve the student. Students in special education can experience stigma, less access to the rigorous instruction given in the general education curriculum, limited interaction with their peers without disabilities, and lower expectations, which can limit their progress and outcomes. In addition, serving a student in special education through an IEP is costlier than serving one through interventions and general education supports.

As mentioned in the “District Special Education Enrollment Compared to Countywide and Statewide Enrollment” section of this report, from 2020-21 through 2024-25, the percentage of district students in grades TK-8 enrolled in special education increased by 4.85 percentage points and is above state and county averages. The cause of the district’s increasing special education identification rate appears to be influenced by at least the SST process, the MTSS, and the special education eligibility determination process, as outlined below.

Student Success Team Process

Before considering a special education assessment, students with learning differences and/or behavioral or social-emotional needs should be referred to an SST. This school-based team approach is designed to help students with a wide range of concerns related to their school performance and experience. SSTs are responsible for reviewing students’ strengths and weaknesses, identifying appropriate interventions, setting specific, measurable, achievable, relevant, and time-based (SMART) goals, and monitoring students’ progress toward these goals. An SST is composed of the student (if appropriate), the parent or guardian, and various school personnel such as counselors, resource specialists, speech pathologists, school psychologists, classroom teachers, and administrators. All LEAs should have an SST process.

The district has a districtwide SST process and procedures outlined in an SST Guidebook, flowcharts and its MTSS strategic plan. The district provided training on its districtwide SST process approximately three years ago. However, staff reported that despite having clear guidance for SSTs and providing training, this process is not followed consistently across the district. Staff reported that some district schools follow the SST process and use the MTSS to effectively provide intervention and support for students in the general education program. But the SST process at other schools was reported not to support students in the general education program because of factors such as the following:

- The SST process is being viewed and used as a pathway to a special education assessment instead of an opportunity for a student to receive appropriate general education interventions in response to their specific needs.
- The SST process is being circumvented entirely. Staff reported that certain general education teachers coach parents to write a letter, which formally requests a special education assessment for a student who has not gone through the SST process.

Multitiered System of Support

California's MTSS focuses on aligning various initiatives, supports, and resources with content standards to meet the needs of all students. This integrated, comprehensive framework aligns academic, behavioral, and social-emotional learning and implements continual improvement processes throughout the educational system. It serves as a method of organization and uses data collected through universal screening to support decision-making and problem-solving. MTSS includes both response to instruction and intervention (RtI²) and positive behavioral interventions and supports (PBIS).

Response to Instruction and Intervention

Response to instruction and intervention (RtI²) is a nationwide approach targeting individual students who are struggling academically. This approach mobilizes resources from the district, school and/or community to promote student success. It is data-driven and systematic, with tiered levels of intervention. The CDE coined the acronym RtI² to indicate a general education approach of high-quality, culturally responsive differentiated instruction and early intervention, prevention, and behavioral strategies. RtI² uses universal screening and data analysis of all students' learning progress in the general education classroom.

A comprehensive districtwide RtI² system not only prevents the inappropriate identification of students for special education but also ensures the delivery of services within students' LREs. An RtI² system should define the following for tiers 1 and 2:

- Type of intervention (e.g., literacy, mathematics, positive behavior supports).
- Who is selected for the intervention.
- Program, materials, and/or curriculum to be used.
- When students will receive instruction.
- Who will deliver the intervention.
- How students will be grouped.
- Time (i.e., duration and frequency).
- Assessments to be used (e.g., for progress monitoring and entry or exit from the support).

Positive Behavioral Interventions and Supports

Positive behavioral interventions and supports (PBIS) concentrates on fostering the emotional and behavioral learning of students, which leads to an increase in engagement and a decrease in problematic behavior over time. PBIS helps districts adopt and structure evidence-based behavioral interventions.

District Implementation of MTSS

The district has a formal MTSS to address a student's academic, behavioral and/or social emotional needs. It provided training for staff approximately three years ago, addressing what an MTSS is, and provides ongoing training during nonstudent and early release days for staff on tiered interventions. The district also establishes annual MTSS focus areas to support a student's academic, behavioral and social emotional growth.

Academic Support

The district has established and provided training on districtwide academic supports and interventions. The district's universal supports available to all students include items such as a science of reading program to supplement the core English language arts curriculum, thinking maps, and math coaching for teachers. Each elementary school has three intervention teachers, two focused on reading and one on mathematics. Students are identified for intervention groups based on assessment results and move into and out of groups based on progress.

Behavioral and Social-Emotional Support

Staff reported that all district schools have received training in PBIS. Staff interviewed view the PBIS program positively but reported core components of the program are not being implemented at every district school. Effectiveness of PBIS implementation is typically evaluated using tools such as the District Systems Fidelity Inventory (DSFI) and Tiered Fidelity Inventory (TFI).

Staff have also received training in use of restorative practices, and understanding the antecedent, behavior and consequence (A-B-C) of behavior. In addition, the district has adopted SEL curriculum, but it has not assessed whether it is used as intended across all schools.

Determining Eligibility for Special Education

Special education should be reserved for students who are eligible to receive these specialized services. To be eligible for special education, a student must qualify by meeting the two-part test, which requires that they: (1) meet the definition of one of the 14 disability categories in the IDEA, and (2) require specially designed instruction.

Staff reported that the district does not consistently use the two-part test to qualify students for special education at their initial IEP meeting. Staff reported that the IEP teams at some schools decide to qualify a student for special education even if they do not meet the test criteria. This is because of pressure from parents or general education teachers who believe that students with academic differences or behavioral needs are best supported by staff in the special education program, regardless of whether they meet educational criteria for special education and require specially designed instruction.

Not all students who initially qualify for special education services require those services throughout their school years. Students may exit special education at their annual or three-year (triennial) IEP meeting if they have demonstrated an ability to succeed in general education or no longer meet the definition of one of the IDEA's disability categories, and/or have acquired the skills they previously lacked, such as using intelligible speech or language skills.

Staff indicated that some students are not being transferred or "exited" from special education according to the two-part test at their triennial IEP meeting if they no longer qualify. Staff indicated that parent pressure for the student to remain in special education is the largest factor preventing a student's departure. In addition, several staff explained there is a disincentive for speech and language therapists employed by nonpublic agencies to exit a student from special education since it could decrease their agency's contract with the district. Keeping students in special education who do not require it is not a best practice. As previously mentioned, students experience less stigma, increased access to rigorous instruction given in general education, and more interactions with their typically developing peers when they are not enrolled in special education. A student's exit from special education is evidence of the student's and the program's success.

To help the district evaluate its special education entry and exit data and eligibility determination procedures, it could collaborate with its attorney to review district psychoeducational and speech and language assessments to identify several where the IEP team used the two-part test correctly to determine eligibility for special education and several where the IEP team did not. Then, any student, staff or school identifying information could be redacted from each assessment, and an attorney or expert witness (e.g., school psychologist or speech and language therapist) could use the redacted documents when they provide training on special education entrance and exit criteria and best practices. This training could be provided for special education staff and staff who serve as the administrative designee at IEP meetings.

Section 504 Plans

School districts can use Section 504 plans to support students with disabilities who do not require specialized instruction. These formal plans specify the necessary accommodations and services to be provided within the general education setting. Training on Section 504s should be provided at least annually to ensure students are served appropriately in the general education setting. Staff indicated training on Section 504 plans has not been provided in at least the last several years.

Recommendations

The district should:

1. Require that all schools consistently use the districtwide SST process with fidelity and monitor and support its consistent use.
2. Continue to annually identify MTSS focus areas and provide support and professional learning as necessary.
3. Assess the fidelity of implementation of its PBIS program using tools such as the District Systems Fidelity Inventory (DSFI) and Tiered Fidelity Inventory (TFI) and provide support and professional learning as necessary.
4. Determine whether its social emotional learning curriculum is used as intended across district schools and adjust implementation and/or provide professional learning as necessary.
5. Provide professional learning for special education staff and other staff who serve as the administrative designee at IEP meetings on how to properly determine special education eligibility using the two-part test.
6. Assess its Section 504 procedures and processes and determine whether additional training and/or support are needed.

Service Options in the Least Restrictive Environment

The IDEA establishes nationwide minimum standards for providing education services to children with disabilities, as well as related services for eligible infants, toddlers, preschoolers, children, and youth with disabilities up to the age of 22. It mandates that each state ensure the availability of a FAPE for any child with a disability who needs special education and related services, regardless of whether they have failed or been retained in a course or grade, and even if they are advancing from one grade level to another (Title 34, Section 300.101(c) of the Code of Federal Regulations (34 CFR 300.101(c))).

The IDEA also requires that students with disabilities be educated in the LRE. To determine the appropriate setting for an individual student, the IEP team reviews the student's strengths and needs and considers the educational benefit of placement in different educational settings. The CDE assesses LRE placement, and the results are published in indicators 5 and 6 of its Local Level Annual Performance Report. These reports, which are required by the IDEA, evaluate districts on 14 indicators for which the target is deemed to be either met or not met.

Preschool Least Restrictive Environment

In 2023-24, the district's Local Level Annual Performance Report indicated it met one of the three targets for indicator 6, which assesses the placement of preschool students in the LRE, expressed as a percentage of the total number of preschool students who receive special education services, as shown in Table 4 below.

Table 4. District's 2023-24 Performance on Indicator 6 – Preschool Students in the LRE According to the Local Level Annual Performance Report

Indicator	Indicator	Rate	Target	Target Met?
6a	Preschool LRE: Regular Program	11.67%	≥45.00%	No
6b	Preschool LRE: Separate Class	43.33%	<27.00%	No
6c	Preschool LRE: Home	1.67%	<3.50%	Yes

Source: Local Level Annual Performance Report 2023-24 (CDE) (most recent report).

The district's Local Level Annual Performance Report indicates it needs to increase the percentage of preschool students it serves in the regular program and decrease the percentage served in separate classes. Staff reported the district used to provide SAI for students with disabilities in the state and Head Start general education preschool programs, but now only support students in the district's preschool special day classes. In addition, certain district preschool-age students are eligible for non-program-based walk-in services (speech and language therapy and/or occupational therapy).

School-age Least Restrictive Environment

In 2023-24, the district's Local Level Annual Performance Report indicated it met two of the three targets for indicator 5, which assesses the placement of school-age students in the LRE, expressed as a percentage of the total number of school-age students who receive special education services, as shown in Table 5 below.

Table 5. District's 2023-24 Performance on Indicator 5 – School-Age Students in the LRE According to the Local Level Annual Performance Report

Indicator	Indicator	Rate	Target	Target Met?
5a	LRE Rate: In Regular Class More than 80%	56.79%	≥64.00%	No
5b	LRE Rate: In Regular Class Less than 40%	14.90%	<15.00%	Yes
5c	LRE Rate: Separate Schools	0.17%	<2.80%	Yes

Source: Local Level Annual Performance Report 2023-24 (CDE) (most recent report).

The district's Local Level Annual Performance Report indicates it needs to increase the percentage of school-age students it serves in the general education program for more than 80% of the school day.

The district offers the following continuum of special education programs and related services at district operated schools.

- Full-time participation in general education settings with access to related services.
- Specialized Academic Instruction (SAI) in general education settings with coteaching support or access to a learning center.
- SAI in a separate class (SDC) with opportunities to mainstream in general education settings throughout the day for academic and/or nonacademic activities.

All but two of the district's SDCs for elementary-aged students are located at Felton Elementary. According to [DataQuest](#), in 2024-25, 130 of the 364 students at Felton Elementary were enrolled in special education. This is more than one-third of all students at the school and more than double the percentage of students districtwide who are in special education.

While the IDEA does not define LRE as a student's neighborhood school, ideally, students enrolled in an SDC would be able to attend the same school as their siblings and typically developing students from their neighborhood, which is not the case in this district. In addition, the district may be increasing its transportation costs since it provides transportation to all students who are not attending their neighborhood school. The district needs to perform a cost-benefit analysis to evaluate the financial and nonfinancial advantages and disadvantages of dispersing its SDCs across more of its elementary school campuses.

Coteaching Service Delivery Model

Friend (2008), who is a Professor Emerita of Education in the Department of Specialized Education Services at The University of North Carolina at Greensboro, defines coteaching as a general education teacher and a specialist, such as a special education teacher, reading specialist or speech and language therapist, partnering to "create a learning situation that cannot be produced by a solo teacher." Coteaching and other collaborative instructional models are widely used in elementary and secondary schools (Vembye, M. H., Weiss, F., & Hamilton Bhat, B., 2024). While some previous research studies and reviews of academic literature have stated that there is little evidence that coteaching improves the academic achievement of students with disabilities, Vembye et al. (2024) conducted a meta-analysis of 76 studies and determined collaborative teaching results in a statistically significant positive increases in students' academic achievement compared to students in single-taught classes.

District Coteaching Program

Each of the district's elementary schools has a learning center staffed with two education specialists. Students with IEPs who are not enrolled in an SDC are on a general education class roster and spend most of the school day in their general education classroom. The learning centers offer a physical location to provide specialized academic instruction in a small group setting. Specialized academic instruction is also provided by education specialists who coteach alongside general education teachers in general education classrooms. The district's middle school does not have a learning center, but education specialists are engaged in coteaching in general education classrooms. In addition, instructional aides at the elementary and middle schools push in to general education classrooms to provide services to students with IEPs alongside their peers without IEPs.

District staff interviewed viewed the coteaching program positively and cited benefits that included students with IEPs being able to spend more time with their peers without IEPs and having a greater friend group. Staff also reported the coteaching program allows additional students with IEPs to have access to general education settings instead of requiring placement in an SDC. As mentioned in the "District Alignment with the 2015 Report on One System" section of this report, coteaching training is a key strategy the district has identified in its CDE CIM plan to address its significantly lower performance of students with disabilities compared to general education students in ELA according to CAASPP.

Coteaching is a service delivery model for providing SAI to students with IEPs that is aligned with the 2015 Report on One System, referenced earlier in this report, because it enables more students to be educated in general education settings. As previously mentioned, the district's Local Level Annual Performance Report indicates it needs to increase the percentage of school-age students it serves in the general education program for more than 80% of the school day, and coteaching is a service delivery many districts use to accomplish that goal.

Staff interviewed reported that there are two main challenges with the district's coteaching model:

1. Common planning time for education specialists and general education teachers who are coteaching together is a critical component of effective coteaching programs. Common planning time for coteaching is built into the district middle school's master schedule, but the district does not provide common planning time at the elementary school level unless a particular school is funding common planning time through its school site plan. Even so, elementary coteachers interviewed reported that they plan with their coteaching partners through Google docs, short check-in meetings, and via text messages. However, this is not ideal or how coteaching is meant to be implemented. Common planning time is a core component of coteaching models and should be provided by the district across its schools.
2. While the district has provided extensive coteaching training over many years, due to teacher turnover, staff reported that certain general education teachers have not received the training and as a result may be hesitant or resistant to coteaching. Staff interviewed reported that general education teachers value coteaching training when they receive it. Congruently, staff who attended the district coteaching training provided in February of 2025 rated the training very highly. On a scale of one through 10 where 10 was the highest, on average staff reported: "overall satisfaction," 9.43 out of 10; "organized information," 9.38 out of 10; and "materials and resources," 9.56 out of 10.

FCMAT was asked to make recommendations to the district, providing guidance on a process that can be used if it decides to use a model other than coteaching to meet the needs of its students with disabilities. FCMAT recommends the district do the following:

1. Consult peer reviewed academic literature to identify other models of delivering SAI to students with IEPs which also yield statistically significant increases in academic achievement.
2. Identify other elementary districts in the state implementing those other models and send a district team including general education teachers, education specialists, instructional aides and administrators to visit classes, speak with and learn from those implementing these models.
3. Using information gained from the district visits, perform a cost-benefit analysis to evaluate the financial and nonfinancial advantages and disadvantages of implementing a model other than coteaching to deliver SAI to students with IEPs in general education settings. As part of this, evaluate the impacts on students' placement in the LRE.
4. If the district decides to implement a different model to deliver SAI to students with IEPs in general education settings, develop a plan to address items such as staff professional learning needs and how to consider and document this change in student IEPs.
5. Modify the district's CDE CIM plan to address its significantly lower performance of students with disabilities compared to general education students in ELA according to CAASPP to document the new service delivery model and strategies to support it.

Recommendations

The district should:

1. Increase the percentage of preschool students it serves in the regular program and decrease the percentage served in separate classes.
2. Increase the number of school-age students with disabilities educated in general education settings for more than 80% of the school day.
3. Monitor what percentage of the school day preschool and school-age students with IEPs spend in general education settings, with a focus on meeting or exceeding LRE targets in its Local Level Annual Performance Report.
4. Perform a cost-benefit analysis to evaluate the financial and nonfinancial advantages and disadvantages of dispersing its SDCs across more of its elementary school campuses.
5. Determine how it can provide common planning time for coteaching partners across all schools.

District Organization and Central Office Special Education Staffing

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.

Special Education Program Support Staffing

Administrator/Leadership Positions

The Special Education Department has 3.00 FTE administrator/leadership positions supporting its pre-school and school-age special education programs, as shown in Table 6 below.

Table 6. Administrator/Leadership Positions Supporting Special Education in 2025-26

Position Title	Number of Positions	Total FTE
Special Education Director	1	1.00
Program Specialist	2	2.00
Total	3	3.00

Source: District-provided data.

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

Central Office Administrative Support Positions

The Special Education Department has 1.75 FTE administrative support staff, as shown in Table 7 below.

Table 7. Administrative Support Staff Positions Supporting Special Education in 2025-26

Position Title	Number of Positions	Total FTE
Secretary III	1	1.00
Clerk	1	0.75
Total	2	1.75

Source: District-provided data.

Special Education Staffing Comparison

FCMAT conducted an informal survey of elementary school districts in California with student enrollment and unduplicated pupil percentages (UPP) similar to those of the Lennox School District.¹ The survey aimed to collect information on central office staffing within the school districts' special education departments:

¹ The term UPP refers to the percentage of students who are English learners, foster youth, or eligible for free or reduced-price meals. Each student is counted only once, regardless of how many categories they qualify for.

- **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 8 below compares the Lennox School District Special Education Department central office staffing with data from the three elementary school districts that participated in FCMAT's survey. On average, these school districts have 2.33 FTE administrator/leadership positions supporting special education in the central office, while Lennox School District reports a slightly higher level of staffing of 3.00 FTE. For special education administrative support positions in the central office, the comparison school districts average 1.50 FTE, whereas Lennox School District reports a higher level of staffing of 1.75 FTE.

Table 8. Administrator and Administrative Support Position Staffing Comparison

District	County	2024-25 Census Day Enrollment	2024-25 Census Day UPP%	2025-26 Administrator/ Leadership Position FTE	2025-26 Administrative Support Position FTE
Fallbrook Union Elementary	San Diego	5,042	74.79%	3.00	2.00
Hanford Elementary	Kings	5,463	79.68%	2.00	0.50
Perris Elementary	Riverside	5,522	91.78%	2.00	2.00
Average FTE				2.33	1.50
Lennox School District	Los Angeles	5,604	92.92%	3.00	1.75

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

Notes: Lennox 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.

Lennox School District has 0.67 FTE more administrator/leadership positions and 0.25 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. Higher staffing levels may reflect the district's efforts to manage compliance requirements and support inclusive practices. However, 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.

Specialized Academic Instruction Teachers

The district employs education specialists, called specialized academic instruction (SAI) teachers, who support students with mild-to-moderate support needs. SAI is defined as:

Adapting, as appropriate to the needs of the child with a disability to content, methodology, or delivery of instruction to ensure access of the child to the general curriculum, so that he or she can meet the educational standards within the jurisdiction of the public agency that apply to all children (Code of Federal Regulations, Title 34, Section 300.39(b)(3)).

The district's collective bargaining agreement indicates that the caseload for SAI teachers shall not exceed 28 students. In 2025-26, the district has 16.0 FTE SAI teachers. Based on caseload estimates provided by the district, these teachers manage the cases of 329 students, averaging 20.56 students per teacher, as shown in Table 9 below.

Table 9. Specialized Academic Instruction Teachers Staffing, 2025-26

School Level	Total Teacher FTE	Total Student Caseload	Average Teacher Caseload	Industry Standard Caseload Range	Staffing Needed to Meet Industry Standard Caseload Range	Staffing Above (+) or Below (-) Industry Standard
Elementary School	10.00	174	17.40	20-24 students per teacher	8.70 FTE (20 students per teacher) 7.25 FTE (24 students per teacher)	+1.30 FTE (20 students per teacher) +2.75 FTE (24 students per teacher)
Intermediate	6.00	155	25.83	20-24 students per teacher	7.75 FTE (20 students per teacher) 6.46 FTE (24 students per teacher)	-1.75 FTE (20 students per teacher) -0.46 FTE (24 students per teacher)
Total	16.00	329	20.56	20-24 students per teacher	16.45 FTE (20 students per teacher) 13.71 FTE (24 students per teacher)	Within Industry Standard Range

Sources: District-provided data and industry standards.

In 2025-26, the districtwide SAI teacher staffing is within the industry standard range for SAI-based programs supporting students in their LRE. SAI teacher staffing for the middle school meets the Education Code standard for resource specialists but is below the industry standard range for SAI-based programs supporting students in their LRE. The district needs to evaluate whether adding SAI teacher staffing at the middle school level would allow for it to provide better service to students.

Special Day Class Staffing – School-Age Programs

The Education Code does not define class size or caseload maximums for SDC programs. The contract between the district and the teachers' association specifies that the caseload for SDC teachers shall not exceed 14 students. For comparison, the industry standard caseload ranges are shown in Table 10 below.

Table 10. Industry Standards 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	8-10 students per 1 teacher

Sources: Industry standards.

Mild-to-Moderate Special Day Class Programs

In 2025-26, the district has 11.0 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 103 students, averaging 9.36 students per teacher, as shown in Table 11 below.

Table 11. Mild-to-Moderate Special Day Class Program Teacher Staffing, 2025-26

School Level	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
Elementary School	9.00	85	9.44	12-15 students per teacher	7.08 FTE (12 students per teacher) 5.67 FTE (15 students per teacher)	+1.92 FTE (12 students per teacher) +3.33 FTE (15 students per teacher)
Intermediate	2.0	18	9.00	12-15 students per teacher	1.50 FTE (12 students per teacher) 1.20 FTE (15 students per teacher)	+0.50 FTE (12 students per teacher) +0.80 FTE (15 students per teacher)
Total	11.0	103	9.36	12-15 students per teacher	8.58 FTE (12 students per teacher) 6.87 FTE (15 students per teacher)	+2.42 FTE (12 students per teacher) +4.13 FTE (15 students per teacher)

Sources: District-provided data and industry standards.

In 2025-26, the districtwide mild-to-moderate SDC teacher staffing is above the industry standard range. Staff reported the district does not have enough SDCs for students with extensive support needs, and places certain students with those needs in mild-to-moderate SDCs. This may mean the district cannot place as many students in these classes and cause the district's mild-to-moderate SDC teacher staffing to be above the industry standard range. Better grouping of students with IEPs into SDCs based on their support needs results in students being taught by teachers who hold the appropriate credential to address those needs.

Extensive Support Needs Special Day Class Program

In 2025-26, the district had 2.00 FTE SDC teachers for students with extensive support needs. Based on caseload estimates provided by the district, these teachers managed the cases of 17 students, averaging 8.50 students per teacher, as shown in Table 12 below.

Table 12. Extensive Support Needs Special Day Class Program Teacher Staffing, 2025-26

School Level	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
Elementary School	1.0	10	10.00	10-12 students per teacher – cross-categorical	1.00 FTE (10 students per teacher) 0.83 FTE (12 students per teacher)	Within Industry Standard Range
Middle School	1.0	7	7.00	10-12 students per teacher – cross-categorical	0.70 FTE (10 students per teacher) 0.58 FTE (12 students per teacher)	+0.30 FTE (10 students per teacher) +0.42 FTE (12 students per teacher)
Total	2.0	17	8.50	10-12 students per teacher – cross-categorical	1.70 FTE (10 students per teacher) 1.42 FTE (12 students per teacher)	+0.30 FTE (10 students per teacher) +0.58 FTE (12 students per teacher)

Sources: District-provided data and industry standards.

In 2025-26, the districtwide extensive support needs SDC teacher staffing was above the industry standard range. However, this staffing level is warranted because there is just one extensive support needs SDC at each school level.

Special Day Class Staffing – Preschool Programs

The Education Code does not define class size or caseload maximums for preschool SDC programs. The district's contract with the teachers' association specifies that preschool SDC teachers will not serve more than 12 students per half-day session. The industry standards for caseload for preschool programs are shown in Table 13 below.

Table 13. Industry Standards for Preschool Special Day Class Programs

Program Type	Industry Standard Caseload Size
Preschool Special Day Class –Mild/Moderate Support Needs – Cross-Categorical	14 students per 1 teacher
Preschool Special Day Class – Extensive Support Needs – Cross-Categorical	10 students per 1 teacher
Preschool Special Day Class – Autism	9 students per 1 teacher

Sources: Industry standards.

Preschool Cross-Categorical Special Day Class Program

In 2025-26, the district has 2.0 FTE teachers for the preschool cross-categorical SDC program. Based on caseload estimates provided by the district, these teachers manage the cases of 23 students, as shown in Table 14 below.

Table 14. Preschool Cross-categorical Special Day Class Program Teacher Staffing, 2025-26

School Level	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
Preschool Cross-categorical SDC	2.0	23	11.5	10-14 students per teacher – cross-categorical	2.30 FTE (10 students per teacher) 1.64 FTE (14 students per teacher)	Within Industry Standard Range

Sources: District-provided data and industry standards.

Note: Since the district operates a cross-categorical SDC for students with mild-to-moderate and extensive support needs, FCMAT used a blended industry standard caseload range of 10-14 students per teacher.

In 2025-26, the districtwide preschool cross-categorical SDC teacher caseload average was within the industry standard range.

Recommendations

The district should:

1. Annually compare SAI teacher staffing and caseloads to industry standards and ensure they are adequate to meet student needs.
2. Evaluate whether adding SAI teacher staffing at the middle school level would allow it to provide better service to students.
3. Evaluate how it can better group its students with IEPs who are enrolled in an SDC into an SDC that is based on their support needs (mild-to-moderate or extensive) so they can be taught by a teacher with an appropriate credential and training to match their support needs.
4. Annually monitor caseloads and student needs for its preschool and school-age SDC programs to determine if it needs to make staffing changes.

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 in its special education program under two job titles:

1. Instructional Aide – The job description states that this position, “Works directly with an assigned classroom teacher(s) to assist in the Special Education program.”
2. Instructional Aide – Registered Behavior Technician – The job description states that:

Registered Behavior Technicians will work directly with an assigned classroom teacher(s) to assist in the Special Education instructional program. Under supervision, will administer intensive behavioral intervention to identified Special Education students and will perform a variety of activities in support of instructional programs for students who have been diagnosed with an autism spectrum or related disorder that requires behavior support.

Industry Standard SDC Instructional Assistant Staffing Ratios

The industry standard base staffing for SDCs is to assign one instructional assistant 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 assistants 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 15 below.

Table 15. Industry Standard Instructional Assistant Staffing and Adult-to-Student Ratios

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

When using an adult-to-student ratio to determine instructional assistant staffing, the teacher is included as an adult, and any students who have a 1-to-1 instructional assistant for the majority of the school day and their assigned 1-to-1 instructional assistant need to be removed from the ratio.

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. If the district allocated special education instructional aides to its SDCs using the industry standard adult-to-student ratios, it might have been able to reduce by nine SDC instructional assistants as shown in Table 16 below.

Table 16. SDC Instructional Aide Allocation – District Compared to Industry Standards, 2025-26

School and SDC Class	SDC Enrollment	SDC 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
Felton Elementary SDC Mild-to-Moderate Support Needs TK-1	11	11	3	4-to-11 or 0.36	1-to-7 or 0.14	+2 Above Industry Standard
Felton Elementary SDC Mild-to-Moderate Support Needs TK-2	8	8	2	3-to-8 or 0.38	1-to-7 or 0.14	+1 Above Industry Standard
Felton Elementary SDC Mild-to-Moderate Support Needs TK-2	8	7	2	3-to-7 or 0.43	1-to-7 or 0.14	+1 Above Industry Standard
Felton Elementary SDC Mild-to-Moderate Support Needs K-3	10	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Equal to Industry Standard
Felton Elementary SDC Mild-to-Moderate Support Needs K-3	13	13	2	3-to-13 or 0.23	1-to-7 or 0.14	+1 Above Industry Standard
Felton Elementary SDC Mild/-to-Moderate Support Needs 3-5	13	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Equal to Industry Standard
Felton Elementary SDC Mild-to-Moderate Support Needs 3-5	13	13	2	3-to-13 or 0.23	1-to-7 or 0.14	+1 Above Industry Standard
Jefferson Elementary SDC Mild-to-Moderate Support Needs TK-2	7	7	2	3-to-7 or 0.43	1-to-7 or 0.14	+1 Above the Industry Standard
Jefferson Elementary SDC Mild-to-Moderate Support Needs 3-5	3	3	1	2-to-3 or 0.67	1-to-7 or 0.14	Equal to Industry Standard

School and SDC Class	SDC Enrollment	SDC 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
Jefferson Elementary SDC Extensive Support Needs	10	9	2	3-to-9 or 0.33	1-to-5 or 0.20	Equal to Industry Standard
Lennox Middle School SDC Mild-to-Moderate Support Needs	9	9	2	3-to-9 or 0.33	1-to-7 or 0.14	+1 Above the Industry Standard
Lennox Middle School SDC Mild-to-Moderate Support Needs	9	9	2	3-to-9 or 0.33	1-to-7 or 0.14	+1 Above the Industry Standard
Lennox Middle School SDC Extensive Support Needs	7	4	1	2-to-4 or 0.50	1-to-5 or 0.20	Equal to Industry Standard

Source: Industry standards and district-reported data.

Note: Only schools with SDCs were included in this table.

The preschool SDCs were not analyzed because FCMAT does not have an industry standard adult-to-student ratio for these types of SDCs.

The districtwide instructional assistant staffing for its SDCs is above the industry standards, in part because the district does not use adult-to-student ratios. However, since the district does not differentiate most of its SDCs based on student support needs (mild-to-moderate versus extensive), it is difficult to say whether the district's instructional assistant staffing is higher than necessary to support student needs because the composition of students in the comparison SDCs may have had different student support needs.

1-to-1 Student Support

In 2025-26, the district has nine staff who are assigned to provide 1-to-1 student support. There is no established industry standard for special education instructional assistants providing 1-to-1 student support. Many LEAs throughout the state have taken steps to remove the designation of 1-to-1 support because it unintentionally reinforces the concept of one adult assigned to one student.

Industry practice commonly refers to both the assessment process and the special education instructional assistant role as special circumstance instructional assistance (SCIA). The district does not use an SCIA assessment process to make decisions regarding assignment of 1-to-1 student support. In the past, the district has used a functional behavior assessment for this purpose. However, a functional behavior assessment is not specifically designed like the SCIA assessment is to assess whether a student requires 1-to-1 student support.

Using an SCIA assessment process, an LEA can identify when during the school day a student requires 1-to-1 student support and assign this only for those times (e.g., for mathematics or during recess). This is an alternative to assigning a staff member to provide the student with 1-to-1 support for the entire school day, which is only necessary for certain students. It also helps the IEP team move away from the concept of assigning one adult to one student, which may enable the district to assign one special education instructional assistant to more than one student when appropriate.

In addition, part of an 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 they do not regularly write goals for independence and/or plans to reduce a student's reliance on 1-to-1 student support.

Recommendations

The district should:

1. Use the industry standard adult-to-student ratios to determine the assignment of special education instructional assistants to SDCs. However, if the district continues to assign students to SDCs that are not differentiated by student support need, these industry standard adult-to-students ratios may need to be adjusted based on the student needs in each individual class.
2. Adopt an SCIA assessment to determine whether a student requires 1-to-1 student support. Provide training and support for staff on the SCIA assessment and require its consistent use.
3. Evaluate whether a student determined to require 1-to-1 student support needs it for the entire school day, or just part of it. Only assign 1-to-1 student support when it is required.
4. Train staff on how to write goals for independence and a 1-to-1 student support phase-out plan for all students who have 1-to-1 student support, except for medically necessary support.

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, speech and language therapy, and occupational therapy.

FCMAT analyzed staffing ratios for the district's adaptive physical education (APE) teachers, OTs, credentialed school nurses, school psychologists, and SLPs. Staffing ratios for other related service providers were not analyzed because there is no established industry standard for them, or the SELPA provides those services. The industry standards for related service providers are shown in Table 17 below.

Table 17. 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, and students' needs to determine if they need to change the number of APE teachers.

In 2025-26, the district has a 0.50 FTE APE teacher position, with a caseload of 18.00 students receiving direct services, as shown in Table 18 below.

Table 18. 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	0.50	18.00	18.00	1-to-45-55	0.40 FTE (to meet 1-to-45) 0.33 FTE (to meet 1-to-55)	+0.10 FTE (above 1-to-45) +0.17 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 almost equal to 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 health specialists, schoolwide needs, and students' needs to determine if changes to credentialed school nurse staffing are needed.

In 2025-26, the district has 1.0 FTE credentialed school nurse positions, with a caseload of 3,941 students, as shown in Table 19 below.

Table 19. Credentialed School Nurse Staffing, 2025-26

Provider	Number of FTE	2025 Census Day Enrollment	Caseload Average	Industry Standard Provider-to-Student Ratio	FTE Needed to Meet Industry Standard	Staffing Above (+) or Below (-) Industry Standard
School Nurse	1.0	3,941	3,941	1-to-2,274	1.73 FTE	-0.73 FTE

Sources: Pupil Services Staff by Type (CDE), district-provided data, and Enrollment for Non-Charter Schools - Lennox School District (CDE).

As shown in the table, the district is staffed below the industry standard staffing levels for credentialed school nurses. However, each school has a health specialist who helps with health-related reporting, addressing student medical needs, and other support for the credentialed school nurse so staffing may be adequate to meet 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 2.0 FTE OT positions, each with an average caseload of 47.5 students receiving direct services, as shown in Table 20 below.

Table 20. District Occupational 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
Occupational Therapist	2.0	95	47.5	1-to-45-55	2.11 FTE (to meet 1-to-45) 1.73 FTE (to meet 1-to-55)	Within Industry Standard Range

Sources: District-provided data and industry standards.

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

As shown in the table, the district is staffed within the industry standard range for OTs.

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 school needs.

In 2025-26, the district has 4.0 FTE school psychologist positions serving school-age programs, each with an average caseload of 985.25 students, as shown in Table 21 below. In addition, the district has a 1.0 FTE school psychologist who performs preschool assessments and is not included in this analysis.

Table 21. School Psychologist Staffing for School-Age Programs Compared to Industry Standard, 2025-26

Provider	Number of FTE	2025 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 for School-Age Programs	4.0	3,941	985.25	1-to-977	4.03 FTE	-0.03 FTE

Sources: District-provided data, Pupil Services Staff by Type (CDE), and Enrollment for Non-Charter Schools - Lennox School District (CDE).

Note: Only the district's 4.0 FTE school psychologists who serve school-age students were included in this staffing comparison.

As shown in the table, the district is staffed just below the industry standard staffing levels for school psychologists for school-age programs. Staff reported that school psychologists who serve the school-age program work in the comprehensive role of a school psychologist, which means they provide social-emotional and behavioral support, consult with teachers, provide 1-to-1 counseling, and complete assessments. Staff reported that most of these psychologists' time is spent on initial and triennial psychoeducational assessments.

Staff reported that the high number of psychoeducational assessments, which have been ongoing since the return to schools following the COVID-19 pandemic, places significant demands on the school psychologists' workload and increases the district's need for these positions. The district needs to begin collecting quarterly data by school on:

- Referrals for assessments.
- Assessments completed.
- Students who qualify and do not qualify for services.

Tracking this data will enable the district to identify referral patterns by school, teacher or service provider, supporting more informed decisions about staffing and resource allocation.

Speech and Language Pathologists

Speech and Language Pathologists Serving the Preschool Program

Education Code 56441.7(a) establishes a maximum caseload of 40 students for SLPs serving preschool students. Districts need to annually review SLP caseload projections and students' needs to determine if changes to preschool SLP staffing are needed.

In 2025-26, the district has 2.0 FTE SLPs who exclusively provide speech and language therapy for pre-school-age students. These SLPs have an average caseload of 34.5 students, as shown in Table 22 below.

Table 22. Preschool Speech and Language Pathologist Staffing, 2025-26

Provider	Number of FTE	2025-26 Total Caseload	Caseload Average	Contract and Education Code Standard Provider-to-Student Ratio	FTE Needed to Meet Education Code Provider-to-Student Ratio	Staffing Above (+) or Below (-) Education Code Standard Provider-to-Student Ratio
SLPs for Preschool	2.0	69	34.5	1-to-40	1.73 FTE	+0.27 FTE

Sources: District-provided data and EC 56441.7(a).

As shown in the table, the district is staffed just above what is required to meet the Education Code maximum for SLPs serving preschool-age students

Speech and Language Pathologists Serving School-Age Students

Education Code 56363.3 establishes a maximum caseload of 55 students for SLPs serving students ages 5-22. Districts need to annually review SLP caseload projections and students' needs to determine if changes to SLP staffing for school-age programs are needed.

In 2025-26, the district has 10.0 FTE SLPs working exclusively with school-age students who each manage an average caseload of 54.8 students, as shown in Table 23 below.

Table 23. 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 Provider-to-Student Ratio	Staffing Above (+) or Below (-) Education Code Maximum
SLPs – School-Age	10.0	548	54.8	1-to-55	9.96	+0.04 FTE

Sources: District-provided data and EC 56363.3.

As shown in the table, the district is staffed just above the Education Code maximum staffing level for SLPs for school-age programs.

Contracts with Nonpublic Agencies for Speech and Language Pathologists

The best practice is for districts to regularly monitor and evaluate through a cost-benefit analysis whether to contract with nonpublic agencies or hire their own related service provider staff. Staff reported that the district has historically contracted with nonpublic agencies for many of its SLPs. It contracts with NPAs for seven of its 12 total SLPs for preschool-age and school-age programs. Staff reported that the district adjusted its salary schedules for SLPs in 2024-25 to be more competitive and better able to recruit and retain its own SLPs. However, it has not flown district SLP positions recently and has continued to contract with nonpublic agencies since it anticipates a decrease in the number of students who require speech and language therapy as a related service.

Recommendations

The district should:

1. Annually review staffing for all related service providers to determine whether it is aligned with the industry standards and meets student needs.
2. Evaluate whether it needs to add credentialed school nurse staffing to align with industry standards.
3. Collect quarterly data to identify patterns in referrals for initial psychoeducational assessments by school psychologists, particularly for students who do not qualify for services.
4. Review current SLP caseloads and students' needs to determine if it needs to increase SLP staffing for preschool- and/or school-age programs.
5. Perform a cost-benefit analysis to determine whether hiring more of its own SLPs would be more cost-effective than continuing to contract for these positions.

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 UDL and an MTSS, as outlined in the 2015 report on one system. This alignment is essential to improve support for all students, including those with disabilities.

As mentioned in the "Factors Influencing Special Education Identification" section of this report, the district provides annual training in its MTSS focus areas. As the district works to increase access for students with disabilities to general education settings, instructional staff need to be trained to use 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 their learning during lesson design.

Using UDL as a lens involves nourishing a mindset that prioritizes increased flexibility, choice and relevance. Prior to providing training in UDL, it is a best practice to address the critical changes in thinking required to achieve a more inclusive education system for students with disabilities. During interviews, some staff reported that certain teachers do not believe it is their responsibility to support students with disabilities in the general education program. Staff need to understand that they all share a collective responsibility to support the success of every student.

Training for Administrative Designees

Education Code 56341(b)(4) requires that a school district representative who is qualified to provide or supervise the provision of specialized instruction and be knowledgeable about the general curriculum and the district's resources attend IEP meetings. This IEP team member is commonly called the "administrative designee." Interviewees reported district staff serving as administrative designees have received training on their role and responsibilities, on which students are eligible for special education services, and on the IDEA's procedural and substantive requirements. However, this training has not been conducted annually nor always addressed all these areas. As described in the "Cost of Due Process, Mediations, and Settlements" section of this report, the district has a relatively high number of due process complaints, which annual training for administrative designees may help reduce. District staff serving as administrative designees at IEP meetings should receive annual training addressing at least the following:

- Roles and responsibilities of IEP team members.
- Eligibility determination process for 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.

Training for Special Education Instructional Assistants

The best practice is for special education instructional assistants to receive nonviolent crisis intervention training according to recertification requirements and regular training on student support strategies throughout the school year. Staff reported that special education instructional assistants participate in mandated training, receive nonviolent crisis intervention training, and have additional training during non-student workdays or on early release days. Despite this, most staff members indicated that instructional assistants would benefit from additional training addressing:

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

Recommendations

The district should:

1. Provide districtwide professional learning for all instructional staff that addresses UDL.
2. Annually provide comprehensive professional learning for staff serving as administrative designee at IEP meetings.
3. Consider providing professional learning for instructional assistants addressing disability awareness, behavior intervention training, differentiation strategies and providing accommodations and modifications.

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 non-special education SACS resource codes, because those may increase the MOE. In addition, districts should monitor reductions in expendi-

tures 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, Lennox School District includes expenses such as classroom supplies, software, computer equipment, legal and settlement costs, routine restricted maintenance and some (but not all) transportation costs in this reporting, while other districts exclude them. There are also differences in how special education funds are allocated by SELPAs. The Southwest SELPA allocates special education funds to member districts based on the number of students with certain disabilities, special education enrollment and ADA. 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:

- To improve multiyear continuity, FCMAT used only ongoing special education income. FCMAT removed one-time funding totaling \$149,548 in 2021-22, \$1,065,381 in 2022-23 and \$141,236 in 2023-24. 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.
- FCMAT used only special education student expenses in the comparison. During the review period, the district charged some non-special education student expenditures to a special education SACS resource code, as allowed by SACS. To ensure that the unrestricted general fund contributions are attributable solely to special education services, FCMAT excluded \$108,671 in mental health expenditures in 2023-24 and \$388,689 in 2024-25, which were reported not to have been used for special education (and not in the MOE) from its calculation. At the time of this report, \$1,083,778 of the 2025-26 mental health funding was budgeted to support students not in the special education program and was excluded.
- Two journal entries impacting trend data were made while closing the 2024-25 books. First, a percentage of the time school psychologists spent supporting special education students, and the associated portion of their salary and benefit costs, was moved from the unrestricted general fund to mental health funding. The debits made to mental health funds did not correlate to the credits made to the unrestricted general fund, and the 2024-25 unaudited actuals reported a negative expense of \$146,466.76 in the unrestricted general fund for these school psychologists. To account for this, FCMAT reduced the 2024-25 special education expenses in SACS by \$146,466.76 so the impact to special education expenses was neutral. Second, \$69,941 in special education classified salary expenditures

were redesignated as Classified School Employee Summer Assistance Program expenditure without using a special education goal code, which reduced the 2024-25 special education classified salary expenditures. FCMAT restored this amount for this analysis.

- The district did not consistently apply an unrestricted general fund contribution when charging special education expenses to non-special education SACS resources. This caused fluctuations in its unrestricted general fund contributions that were not correlated to total special education expenditures. For this analysis, FCMAT included all funding sources for all years in the district special education unrestricted general fund contribution calculation, which included the following non-special education resources:
 - The unrestricted general fund.
 - Every Student Succeeds Act (ESSA): Title II, Part A, Supporting Effective Instruction Local Grants.
 - Elementary and Secondary School Emergency Relief II (ESSER II) Fund.
 - ESSER III Fund.
 - Arts, Music, and Instructional Materials Discretionary Block Grant.
 - In-Person Instruction (IPI) Grant.
 - Expanded Learning Opportunities Grant: Paraprofessional Staff.
 - Classified School Employee Summer Assistance Program.
 - Extended Learning Opportunities Program (ELOP).

FCMAT added the following amounts back for comparison purposes: \$343,714 in 2021-22, \$579,920 in 2022-23, \$352,498 in 2023-24, and \$266,680 in 2024-25. The district accounted for the impact of these funding sources on the unrestricted general fund contribution in the 2025-26 adopted budget and based on these adjustments there will be an increase to the unrestricted general fund contribution of \$257,028 (excluding transportation expenditures).

- 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. Between 2021-22 and 2024-25 the district charged indirect expenses to non-special education goal codes even though the resource was special education and all expenses were for special education students. Therefore, these costs did not accrue to special education expenses or special education MOE. These expenses were added back to special education expenses, so that the true cost of the special education program can be determined. The best practice is to charge the full indirect rate to all programs, including those with special education SACS resource codes, so that the true cost of the special education program can be determined.

Even with these adjustments, the district's general fund contribution trend does not directly correlate to its increases in total special education expenditures or special education MOE. This is because the district included only some transportation service expenses as special education expenditures for MOE purposes. Despite transporting more students in 2024-25, the district reported only \$252,393 in ongoing transportation costs, which was approximately half of the ongoing expenditures in 2022-23 and 2023-24. Because SACS coding over the review period did not capture all expenses, they cannot be trended. Staff reported this occurred because some of the SACS data were miscoded, and certain transportation expenses were

omitted. Since some districts do not report transportation in the MOE, FCMAT did not include any special education transportation expenses in the unrestricted general fund contribution analysis.

Some home-to school transportation income is generated from a partial reimbursement for expenses coded to SACS Function Code 3600 in a district's unaudited actuals report. These expenses form the basis of the 2025-26 transportation reimbursement. The impact of not capturing all home-to-school transportation expenses in 2024-25 may result in a loss of transportation income in 2025-26.

District Special Education Expenses

FCMAT analyzed the district's special education income and expenditures, using only ongoing income from fiscal years 2021-22 to 2024-25 (one-time 2021-22, 2022-23, and 2023-24 income was excluded), as shown in Table 24 below. FCMAT excluded home-to-school transportation, balanced the 2024-25 closing journal transfers related to school psychologist salaries and their expenses, and reversed the journal entry which reduced special education classified salaries charged to classified summer assistance program funds. Data from 2021-22 was used as the base for calculating the percent change in the "Historical 2022-23" column.

Table 24. Comparison of Adjusted Special Education Expenses (Excluding Transportation) Using Ongoing Income Only, 2022-23 to 2025-26

Category	Historical 2022-23	Historical 2023-24	Adjusted Historical 2024-25	Budget 2025-26	Average Historical Annual Rate
Increase/Decrease in Special Education Students	-0.7%	14.2%	10.6%	N/A	6.4%
Increase/Decrease in Ongoing Income	-21.9%	15.8%	7.9%	-5.5%	0.0%
Increase/Decrease in Certificated Salaries	8.8%	-7.8%	-2.8%	-1.2%	-0.9%
Increase/Decrease in Classified Salaries	12.1%	5.4%	1.1%	-0.4%	4.7%
Increase in Benefits	11.5%	0.0%	1.8%	1.3%	3.7%
Increase in Books and Supplies	0.1%	108.7%	32.7%	10.2%	51.3%
Increase in Services	36.0%	12.5%	19.4%	6.5%	23.7%
Increase/Decrease in Other Tuition	53.9%	9.7%	15.6%	-0.8%	23.4%
Increase/Decrease in Adjusted General Fund Contribution	36.6%	-6.5%	7.3%	2.7%	N/A
Adjusted Dollar Amount of General Fund Contribution	\$11,001,422	\$10,327,651	\$11,076,500	\$11,372,332	N/A
Adjusted Dollar Amount of Special Education Expenses	\$14,806,915	\$14,847,467	\$15,953,729	\$15,980,113	N/A

Sources: Official SACS unaudited actuals, 2025-26 budget, district provided closing journal entries from 2024-25, and [Enrollment for Non-Charter Schools - Lennox School District](#).

Notes: Official SACS data were reduced by one-time income in 2021-22 through 2023-24, and full indirect costs were added. Two 2024-25 closing journal entries reported by the district were adjusted as described above.

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

The district's average ongoing special education funding over the review period was unchanged. In 2025-26, the district is projecting a 5.5% decrease in special education income. Decreases in special education income between 2021-22 and 2024-25 are primarily because the district's funded SELPA ADA fell by 13%. In addition, its decrease in special education income in 2024-25 was partially because the district did not report all its nonpublic school (NPS) students in the CALPADS 16.12 report or all their NPS ADA at second interim. Failure to report NPS students and ADA accurately reduced state and SELPA revenue, increasing the district's reliance on general fund contributions.

During the review period, the number of students identified for special education increased by 6.4% per year, and adjusted expenses increased at an approximate rate of 5.8% per year.

Staffing Costs

From 2021-22 to 2024-25 special education certificated staff salaries decreased by 2.4%. Staff reported this was due to the elimination of 2.0 FTE special education teachers when preparation periods were contractually reduced at the middle school level and because the district began contracting with nonpublic agencies for more of its speech and language pathologist staff. This change shifted costs from certificated salaries to contracted services, contributing to higher service expenditures. Special education classified employee salaries, excluding transportation-related staff, increased by 19.4% during that same period due to increases in instructional aide staffing.

The district is projecting an additional 1.2% decrease in certificated staffing and 0.4% decrease in non-transportation-related classified employee staffing in the 2025-26 budget, which may be underbudgeted.

Cost of Supplies

In 2023-24 the district added a learning software program, Image Learning, to support students in the special education program. Because supply costs charged to special education were minimal prior to the adoption of this program, this ongoing increase in special education supply expenses significantly impacted the rate of increase.

Cost of Nonpublic School Services

According to DataQuest and district CALPADS data, the number of district students attending an NPS increased by two students between 2021-22 and 2025-26, as shown in Table 25 below.

Table 25. District Reported NPS Enrollment, 2021-22 through 2025-26

	2021-22	2022-23	2023-24	2024-25	2025-26
Number of Students	2	1	1	2	4

Sources: Enrollment by Age Range with School Data - Lennox School District (CDE) for 2021-22 through 2023-24 and district-provided CALPADS reports for 2024-25 and 2025-26.

The district reported that due to staff turnover, 2024-25 NPS enrollment data were reported late and therefore not included in the district's 2024-25 DataQuest Enrollment Report by School.

The district only budgeted for a 6.5% increase in service expenditures for 2025-26, despite doubling the number of students placed in an NPS. FCMAT analyzed actual paid-to-date service expenditures through October 30, 2025, and found they increased by 21% over the prior year. When extrapolated, that means the district appears to have underbudgeted its 2025-26 service expenditures by \$1.086 million.

The district does not appear to be collecting all available revenue for its students who are attending an NPS. When FCMAT visited, the district was not monitoring or reporting NPS ADA to the state for funding purposes due to lack of training. NPS transportation expenses are not being captured for partial reimbursement because they are not being coded to SACS Function Code 3600 as described in the “District Transportation Funding” section of this report. These two omissions may have caused reductions in the 2024-25 state and SELPA income generated by these students.

In addition, the district has not received a reimbursement from the state’s extraordinary cost pool program for an NPS student in the last five years or designated a staff member to be responsible for the identification and reporting of students who qualify for reimbursement. It appears that one student would have qualified for reimbursement in 2024-25. At the time of this report, the district’s NPS expenses were commingled with nonpublic agency (NPA) and legal settlement costs reported in SACS. This lack of differentiation does not allow for trending, analysis or forecasting of any of these expenses. With no differentiation in expenses, the district has no means to determine an average cost per student using expenses captured in SACS and the data provided to the CDE. Once a district disaggregates and tracks NPA and NPS costs, a detailed analysis supported by invoices is required to combine NPS and NPA expenses, on an individual student basis, to identify all expenses of qualifying students.

District Unrestricted General Fund Contribution

The district’s adjusted unrestricted general fund contributions, including expenditures for full indirect costs, reductions for one-time income, modifications due to closing journal entries related to school psychologists and classified staff, and excluding transportation expenses, 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	\$8,055,759	\$11,001,422	\$10,327,651	\$11,076,500
Percentage of Adjusted Special Education Costs	62.3%	74.3%	69.6%	69.4%

Sources: Official SACS unaudited actuals, 2025-26 budget, and district provided 2024-25 closing journal entries.

Notes: Official SACS data were reduced by one-time income in 2021-22 through 2023-24, and full indirect costs were added. Two 2024-25 closing journal entries reported by the district were adjusted as described in the “District Special Education Expenses” section of this report.

In 2025-26, the district’s estimated unrestricted general fund contribution (using full indirect costs, adjusted expenditures, reduced by one-time income, and not including transportation) is estimated to be 71.2% of adjusted special education costs. This percentage does not include the addition of \$1.086 million for NPA and NPS services that FCMAT believes will need to be added to the 2025-26 budget. The fluctuations in expenses observed between 2021-22 and 2022-23 were associated with declines in expenses during periods when students were not in attendance because of the COVID-19 pandemic and the district incurring higher service costs. Since 2022-23, the district has incurred significant increased costs related to NPS placements and increased NPA service costs, while special education income has not changed.

Cost of Due Process, Mediations, and Settlements

The IDEA requires school districts to implement all procedural safeguards for children with exceptional needs. When disputes arise over the identification, assessment, educational placement or the provision of a

FAPE, the procedures outline the steps to resolve disagreements at the lowest level (EC 56500.3). Special education is a highly litigated area of federal law, with the primary basis of litigation being disputes over providing a FAPE.

When FCMAT visited the district, it had two open hearings with the Office of Administrative Hearings (OAH) scheduled for cases filed in September and October 2025. Staff reported that one additional case, filed in August 2025, had been settled. This is a relatively large number of filings in a short period of time for a district this size. FCMAT reviewed district OAH cases over the last 10 years and found that all reported cases were settled prior to adjudication by OAH judges. The cause of this is unknown, but the district needs to ensure its IEPs meet the substantive and procedural FAPE compliance standard so it may defend its offer of FAPE. Inconsistent training for administrative designees may have contributed to increased disputes.

Failure to separate legal fees and settlement-related costs prevents accurate budgeting and trend analysis. FCMAT found that the district has not consistently separated special education legal fees from fees for other district legal services. In addition, the district does not track NPA services related to compensatory education due to a legal settlement from other NPA costs.

FCMAT reviewed the district's special education settlements historical data and found that the number of settlements per year was consistent prior to 2024-25. Most settlement agreements reviewed required the district to provide additional assessments and compensatory services with stipulations that they be provided by an NPA instead of district staff. The dollar amounts of legal fees paid on behalf of claimants are generally low over the last three years, as shown in Table 26 below.

Table 26. District's Special Education Related Legal Settlement Costs (Excluding Compensatory Service Costs), 2022-23 through 2024-25

Category	2022-23	2023-24	2024-25
Legal Settlement Costs	\$35,500	\$56,500	\$109,200

Source: District-reported data.

The best practice is for the Business Services and Special Education departments to track expenses separately and regularly monitor budgets for special education related legal fees and settlement costs. Staff reported that an audit firm establishes special education related legal fee and settlement cost budgets, but the Special Education Department provides input in budget development and has access to these budgets.

Recommendations

The district should:

1. Continue to monitor its unrestricted general fund contribution to the special education program.
2. Monitor and track special education expenses charged to non-special education revenues so that the full cost of the program is monitored and MOE managed.
3. Review closing entries to ensure they balance and identify their impact on programs and the special education MOE prior to posting them to the general ledger.
4. Disaggregate, monitor and track transportation, NPA and NPS costs, and annually analyze trend data to use for budgeting.
5. Record NPA, NPS and regional program transportation expenses to SACS Function Code 3600 to generate transportation income.

6. Record transportation costs for all staff supporting special education transportation including office staff and bus attendants to SACS Function Code 3600 to generate transportation income.
7. Conservatively budget for increases in NPA and NPS service expenditures. Compare year-to-date actual to budgeted expenditures at the interim reporting periods and adjust the budget accordingly.
8. Designate a staff person to track and calculate a cost per student for all students who attend an NPS and analyze whether the district may apply for reimbursement from the state's extraordinary cost pool program.
9. Report all students attending an NPS to CALPADS in a timely manner and input the ADA for their NPS attendance into the attendance system regularly.
10. Disaggregate special education legal fees from other district legal costs and annually analyze trend data to use for budgeting.
11. Disaggregate compensatory education NPA services granted due to settlements and report them separately.

School Transportation

State Funding for School Transportation

Historically, school transportation has been one of the most poorly funded areas in California's education budget. Before 1977, school transportation was fully funded. School districts reported their operational costs and were fully reimbursed in the subsequent school year. However, after the adoption of Proposition 13, the state began reducing the percentage of reimbursement for school transportation. By 1982-83, districts were reimbursed at 80% of their reported costs, and the state imposed a cap, limiting reimbursements to the costs reported by school districts in that particular year.

Between 1982-83 and 2012-13, costs rose significantly, cost-of-living adjustments (COLAs) were only occasionally granted, and the demand for special education transportation surged. The economic downturn during the great recession, beginning in 2007 and lasting several years, prompted the state to reduce all categorical programs, including school transportation, by approximately 20%.

In the 2013-14 fiscal year, California adopted the Local Control Funding Formula (LCFF). Under this formula, school transportation funding was allocated as an add-on to each district's LCFF entitlement. This funding must be spent on school transportation expenses, and districts must meet an MOE requirement, ensuring that they spend at least the amount received to maintain the same level of funding.

The Budget Act of 2022 increased school transportation funding. Starting in 2023-24, the LCFF home-to-school transportation add-on receives the COLA. In addition, districts may receive 60% of total prior year transportation costs (reported in SACS Function Code 3600, excluding goal codes 7100-7199 (nonagency programs) and object codes 6000-6999 (capital outlay expenditures)), less the LCFF home-to-school transportation add-on.

In addition, the Budget Act of 2022 trailer bill language reinstated school transportation data collection and required each district in California to adopt a plan by April 1, 2023, articulating how it will offer pupil transportation to the district's unduplicated students (those who are English learners, socioeconomically disadvantaged, or are foster youth or homeless). The plan must be updated each year by April 1. The district adopted its 2025-26 Transportation Services Plan at its board meeting on March 12, 2024, ahead of the April 1 deadline for the 2025-26 school year. Failure to meet this deadline could jeopardize compliance and result in reduced funding.

District Transportation Funding

Since the inception of the LCFF, the district has received \$268,008 for school transportation, adjusted annually by COLA since 2023-24. The 2024-25 second principal apportionment (the most recent data available) indicates the district spent \$789,841 for school transportation in 2023-24. The district incurred capital expenses for the purchase of student passenger vehicles in 2023-24, which reduces its eligible transportation related expenses for reimbursement. Sixty percent of the district's eligible school transportation expenditures in 2023-24 was \$473,905. Consequently, the district received an additional \$183,867 in school transportation funding in 2024-25. The district reported \$484,380 in school transportation expenditures under SACS Function Code 3600 in 2024-25, 60% of which will be eligible for reimbursement.

District Transportation Costs

Total Transportation Program Cost

The district's 2025-26 adopted budget projects \$380,513 in total transportation program expenditures. The district does not provide any general education home-to-school transportation services. Therefore, all transportation expenditures represent special education home-to-school transportation for students whose IEPs identify transportation as a related service.

The district does not maintain a dedicated Transportation Department. The Special Education Department provides oversight of the transportation program and the district's director of facilities and maintenance provides daily supervision and support of the small fleet of alternative passenger vehicles and drivers.

FCMAT noted that certain vehicle maintenance expenses are charged to a program other than special education (such as maintenance and operations or child nutrition), but FCMAT could not verify that all expenses are consistently identified and charged appropriately. The district does not systematically record special education transportation expenditures to SACS Function Code 3600, which means it is not maximizing the amount eligible for reimbursement.

Transportation Expense Analysis

FCMAT found large fluctuations in transportation expenditures reported under SACS Function Code 3600 over the past four years, as shown in Table 27 below. It appears that the district significantly improved its tracking of transportation expenditures reported under SACS Function Code 3600 in 2022-23, which was an 820% increase over the prior year. However, transportation expenditures reported under SACS Function Code 3600 decreased significantly in 2024-25 and are projected to decrease again in the 2025-26 budget. This may indicate that the district is not capturing all its transportation expenses under SACS Function Code 3600, which is critical because the district's transportation reimbursement is based on 60% of eligible expenditures recorded in this function. Accurately identifying and recording these expenditures will allow the district to determine the true cost of its special education transportation program and maximize its state reimbursement.

Table 27. Transportation Expenditures Reported Under SACS Function Code 3600 from 2021-22 through 2025-26

Year	Transportation Expenses	Percent Increase or Decrease
2021-22	\$78,625	N/A
2022-23	\$723,288	819.92%
2023-24	\$895,268	23.78%
2024-25	\$484,380	-45.90%
2025-26 (Projected)	\$380,513	-21.44%

Sources: District provided official SACS unaudited actual data files.

Transportation Cost Per Bus and Per Student

FCMAT was unable to calculate a per-bus or per-student special education transportation cost because these expenditures are not differentiated in the special education budget. The best practice is to separate special education transportation expenditures from other transportation expenses, allowing a compari-

son to statewide industry standards. To address this, all special education transportation costs must be recorded under SACS Function Code 3600. These costs include:

- Capital purchases for vehicles (although these expenses are excluded from the 60% recovery of prior year transportation costs).
- Personnel costs, including applicable percentages for any staff overseeing or supporting transportation (including bus attendants).
- Vehicle maintenance and repairs.
- Fuel, parts, and equipment.
- Contracted transportation services.

Recommendations

The district should:

1. Continue to ensure its annual or multiyear transportation services plans are annually board-approved prior to April 1 for the following school year.
2. Separate and track special education transportation costs so staff may calculate an average cost per student, cost per bus, and cost per alternative transportation vehicle to compare its costs to statewide standards and make informed decisions.
3. Report all special education related transportation expenditures under SACS Function Code 3600 to maximize its annual home-to-school transportation reimbursement.

Special Education Transportation Program

Students Receiving Transportation as a Related Service in their IEP

In 2025-26, the district has 48 students who received transportation as a related service in their IEP. Of the 48 students, four receive transportation through their nonpublic school, one is transported by an external transportation provider, one is transported by their parent who receives an “in-lieu” reimbursement, and 42 students are transported on district-operated alternative passenger vehicles.

The district’s internal transportation program serves 87.5% of students who receive transportation as a related service in their IEP using three alternative passenger vehicles. Two of these vehicles have a maximum ambulatory seating capacity of nine students, and the third has seating for five ambulatory students and one wheelchair station. A fourth vehicle, which is a six-passenger van that accommodates one wheelchair, is used as a backup vehicle when needed. This equates to an average ridership of seven students per vehicle per run, achieving nearly 100% utilization of the nine-passenger alternative passenger vehicles. The district is using its alternative passenger vehicles efficiently.

The district augments its internal student transportation program by using two contracted external transportation providers, EverDriven and HopSkipDrive, and through NPS contracts. External contracted transportation providers are generally more costly than district-operated services, but in this case the costs appear justified because five of the six students receiving transportation from an external contracted transportation provider attend a separate NPS or regional program outside the district’s boundaries.

Transporting one student per contracted route increases per-student costs significantly compared to district operated vehicles.

Table 28 below shows the number and percentage of district students transported by each of the district's transportation providers in 2025-26.

Table 28. Number and Percentage of District Students Transported by Transportation Provider, 2025-26

Transportation Provider	Number of Students Transported by Provider	% of Students Transported by Provider	Average Student Load Ratio
District Alternative Passenger Vehicles	42	87.50%	7 students per route
EverDriven (External Contracted Transportation Provider)	1	2.08%	1 student per route
HopSkipDrive (External Contracted Transportation Provider)	0	0%	N/A
STAR School (NPS)	1	2.08%	1 student per route
The Help Group (NPS)	1	2.08%	1 student per route
Wayfinder School (NPS)	2	4.17%	2 students per route
Parent In-Lieu Contract	1	2.08%	N/A
Total	48	100.00%	N/A

Source: District-provided data.

Routing of Students

The lack of staggered bell schedules across district-operated schools and regional program sites creates significant challenges in routing students. Because multiple programs share overlapping start and dismissal times, the district's limited fleet must travel between geographically dispersed schools without sufficient time buffers. As a result, certain students are losing required instructional minutes due to late arrivals or early departures, which can impact IEP compliance, academic progress, and equitable access to instructional time.

Recommendations

The district should:

1. Annually review contracts with external transportation providers, considering school placement changes and average student load ratios, to determine whether district-operated transportation is more cost-effective.
2. Assess its internal special education program schedules and pursue staggered master bell times where feasible to support reliable student transportation and protect instructional minutes.

Use of Special Education Transportation and Decision Tree

The IDEA explicitly states that transportation should not be a barrier to a student accessing their IEP and receiving a FAPE. A best practice is to use a transportation decision tree, which is a graphical representation of different options, when assessing a student's need for special education transportation as a related service.

Based on what is observed across the state, 10%-13% of special education students in most districts require transportation as a related service in their IEP. In comparison, district data show 6.9% of its students with IEPs receive transportation and 7.5% of students with IEPs have transportation identified as a related service in their IEP. Therefore, the district's identified need and actual receipt of transportation services is below the expected statewide range.

Staff reported that the district does not use a transportation decision tree. Instead, it uses these three indicators to determine whether a student with an IEP requires transportation:

1. The recommended program is not available at their home school.
2. The disability is so severe it prevents the student from being able to navigate surroundings (typically students with extensive support needs). An adaptive assessment is needed to make this eligibility determination.
3. Students eligible for Specialized Academic Instruction (SAI) who use a wheelchair or have a physical disability that significantly impacts mobility (e.g., gait trainer, leg braces) may be eligible for transportation services.

While these indicators provide a useful starting point for determining which students require transportation as a related service in their IEP, they are broad guidelines and not a comprehensive decision-making framework. Without a standardized tool, students who qualify for transportation may not receive it, creating inequities and exposing the district to compliance risks under IDEA. Clear guidelines will support IEP teams in applying criteria uniformly, will ensure that only students meeting disability or program-location thresholds are offered transportation, and will provide services in the least restrictive manner consistent with FAPE.

Recommendations

The district should:

1. Develop a standardized decision-making tool, such as a transportation decision tree or rubric, for IEP teams to use when determining eligibility for transportation as a related service.
2. Train IEP teams to use the decision-making tool and then require its use and monitor to make sure it is utilized consistently.

Transportation Program Leadership and Staffing

The district's Special Education Department provides administrative support to the transportation program and routes students by grouping them geographically based on their residence and school of attendance. The director of facilities and maintenance oversees the daily operation of the three- to four-passenger vehicle routes and coordinates the order students are picked up and dropped off. This arrangement is not what is typically observed in districts this size across the state and creates operational limitations. Most districts have their business services departments provide transportation program leadership. Transportation may be a department under business services or combined with maintenance and operations, which is typical if a district operates fewer than 20 daily routes.

Over the past two years, the district has invested in alternative passenger vehicles and now provides transportation to many of its special education students in district-operated vehicles who were previously transported by an external contractor. The district has not reviewed the organizational alignment of its transportation program, even as it has grown significantly over the past two years. Without such an evalu-

ation, continued expansion increases the risk of noncompliance and operational inefficiencies, such as the underreporting of program expenditures.

If the district were to provide all transportation program leadership and support through a facilities, maintenance and transportation model, the Special Education Department would no longer oversee and support the transportation program. The Facilities and Maintenance Department would assume these duties. Accordingly, the Facilities and Maintenance Department secretary position may need to increase from 0.75 FTE to 1.00 FTE, and the alternative passenger vehicle driver staffing may need to increase from 2.50 FTE to 3.00 FTE to support routing, two-way radio communication, daily operational coverage, field trip coordination, and oversight of routing and dispatch. This additional support is already needed under the district's existing model to meet daily operational requirements.

Alternative Passenger Vehicle Driver Vacancies

At the time of FCMAT's fieldwork, one of the district's alternative passenger vehicle drivers was on long-term leave, and one driver position was vacant, resulting in 80% of the driver workforce being unavailable. During this period, district warehouse workers served as near-permanent substitute drivers. Staff reported ongoing efforts to recruit and onboard one to two new drivers.

High absenteeism and extended vacancies can cause route disruptions, late arrivals to and from school, and put operational strain on substitute drivers who must abandon their regular duties.

Other Typical Transportation Program Staff

The district does not typically assign bus attendants to ride on district alternative passenger vehicles due to limited passenger capacity. This practice is consistent with most small transportation programs that use alternative passenger vehicles.

The district does not employ an in-house mechanic. All district vehicles are maintained by external vendors. Since the district is operating a very small fleet, use of contracted vehicle inspection and repair services is appropriate and cost-effective.

Recommendations

The district should:

1. Evaluate whether transitioning all oversight and support of the transportation program to the Business Services Department using a facilities, maintenance and transportation model would improve operational alignment, efficiency, and timely communication.
2. Consider increasing alternative passenger vehicle driver staffing from 2.50 FTE to 3.00 FTE if recommendation #1 is implemented.
3. Consider increasing the Facilities and Maintenance Department secretary position from 0.75 to 1.00 FTE if recommendation #1 is implemented.
4. Develop written procedures for transportation coordination, including routing protocols, IEP communication, and driver instructions, between special education and facilities, maintenance, and transportation staff if recommendation #1 is implemented.
5. Revise the job description of warehouse workers who serve as substitute alternative passenger vehicle drivers to include transportation responsibilities.

6. Prioritize the recruitment, hiring and onboarding of at least two alternative passenger vehicle drivers to stabilize operations.
7. Create a transportation staffing plan that includes backup driver coverage, required training, and workflow for temporary vacancies to prevent service interruptions.

Alternative Passenger Vehicle Driver Training and Senate Bill 88 Requirements

Although alternative passenger vehicles are not subject to school bus regulatory requirements, the passage of Senate Bill (SB) 88 created extensive compliance requirements under:

- Education Code 39875–39877
- Vehicle Code (VC) 34520.3
- Government Code (GC) 12954

It is common for LEAs to reference only one of these statutes. However, appropriate compliance with SB 88 requires review of all three code sections listed. These statutes collectively define:

- Driver qualifications for staff transporting students.
- Mandatory drug and alcohol testing requirements aligned with Department of Transportation (DOT) Title 49.
- The prohibition against exempting testing for cannabis use when required by federal or state law.

The district has taken several steps to meet SB 88 requirements, including:

- Annual training for alternative passenger vehicle operators.
- Establishment of a non-Department of Transportation (DOT) random drug and alcohol testing pool.
- Training in vehicle inspections, hours of service, and student safety practices.

In addition, the district has scheduled training in December 2025 addressing accident procedures, incident reporting, and onboarding procedures for new staff.

Recommendations

The district should:

1. Ensure it is fully compliant with SB 88 by reviewing all applicable statutes (EC 39875–39877, VC 34520.3, GC 12954) and incorporating requirements into district policy and training documents.
2. Continue to provide annual training for all transportation staff focused on legal compliance, safe operation, student management, and required reporting.

Employer Pull Notice Program

All district alternative transportation vehicle drivers are enrolled in the California Department of Motor Vehicles' Employer Pull Notice (EPN) program in compliance with the California Vehicle Code. This provides annual driver records and real-time updates on moving violations, accidents, or incidents involving driving under the influence.

Recommendation

The district should:

1. Continue to enroll all district alternative transportation vehicle drivers in the California Department of Motor Vehicles' EPN program.

Appendix

A. Study Agreement

Appendix A — Study Agreement



Contract No.: C-1162:25-26

Funding: 01.1-00000.0-00000-72000-5810-0000019

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 Lennox Unified 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. Review the district's implementation of student success teams, response to instruction and intervention, and multitiered system of supports, and make recommendations for improvement, if any.
2. 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.
3. Review the efficiency of staffing allocations of special education paraeducators, per Education Code requirements and/or industry standards, and make recommendations for improvement, if any. Review the procedures for identifying the need for paraeducators, including 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).
4. 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.

5. Determine whether the district overidentifies students for special education services compared to the statewide and countywide averages, and make recommendations for reducing overidentification, if needed.
6. 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.
7. Review the costs of due process activities, mediations and settlements for the past three years and make recommendations for improvements, if any.
8. Review the district's professional development/training program as it relates to special education, and make recommendations for improvement, if any.
9. Review the district's structure of the coteaching inclusion model. Interview district and school site staff to better understand their perspective on the model. Make recommendations to the district, providing guidance on a process that can be used if they decide to use an alternative model to meet the needs of its students with disabilities.
10. Review the district's unrestricted general fund contribution to special education and make recommendations for greater efficiency, if any.
11. Review special education transportation for efficiency and effectiveness, and provide recommendations for potential cost savings measures, if any. The review will include but not be limited to the role of individualized education programs, routing, scheduling, operations and staffing.
12. The Team will present the final report to the district's governing board at a public meeting following the completion of the review.

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 \$29,000.

- 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 St., 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	Draft Agreements are valid for 30 business days.

ACTION	TIMELINE
uploading documents requested by FCMAT.	
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: Arleta Ilyas, CBO

Telephone: (310) 695-4000

Email: arleta_ilyas@lennoxk12.org

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:

DocuSigned by:

4A46537FEA4B4BC... 5/14/2025

Gabriela Tavitian, Superintendent Date
Lennox Unified School District

For FCMAT:

Michael H. Fine Digitally signed by Michael H. Fine
Date: 2025.05.29 08:38:47 -07'00'

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