FCMAT

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM

Special Education Review

November 6, 2025

Montebello Unified School District

Michael H. Fine
Chief Executive Officer

FCMAT FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM

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Mark Skvarna, Ph.D., Superintendent
Montebello Unified School District
123 S. Montebello Blvd.
Montebello, CA 90640

Dear Superintendent Skvarna:

In March 2025, the Montebello Unified 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. Analyze whether the district provides a continuum of special education and related services for students in preschool through age 22, including their placement in the least restrictive environment, and make recommendations for improvement (which may include instructional models), if any.
7. 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.

Michael H. Fine • Chief Executive Officer
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8. Review the costs of due process activities, mediations and settlements for the past three years and make recommendations for improvements, if any.

9. Review the district's professional development/training program as it relates to special education, and make recommendations for improvement, if any.

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.

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

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

Sincerely,

Michael H. Fine
Chief Executive Officer

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About FCMAT

Purpose and Services

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

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

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

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

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

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

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

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

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

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

History

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

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

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

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

Introduction

Background

Located in Los Angeles County, the Montebello Unified School District serves students in transitional kindergarten through grade 12 (TK-12) across 18 elementary, six middle, four high and four adult schools. According to DataQuest, 19,195 TK-12 students were enrolled in 2024-25.

The district is a member of the Downey-Montebello 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, 18.95% of the district's students were identified as requiring special education (DataQuest).

In March 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 August 6-7, 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

Tim Purvis
FCMAT Consultant

Cassady Clifton
FCMAT Technical Writer

Those members of this study team who are otherwise employed by a local educational agency were not representing their respective employers but were working solely as independent contractors for FCMAT.

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 Montebello Unified 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 12 (TK-12) students enrolled in special education increased by 4.19 percentage points. In 2024-25, 18.95% of TK-12 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 typically developing peers, 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. Staff also cited post-pandemic student absenteeism as a factor contributing to increased special education identification.

Interviewees explained that students who are chronically absent often experience learning loss and skill gaps compared with their peers, and, because the district has limited academic interventions, these students may be referred for special education assessments. Identifying students for special education before implementing general education interventions does not best serve them and serving a student in special education through individualized education programs (IEPs) is costlier than serving one through interventions and general education supports. Many school districts use MTSS to address chronic absenteeism with structured attendance supports and interventions. The district has not taken this approach and therefore may not be addressing certain student needs while increasing its special education identification rate and related costs.

In 2024-25, approximately three quarters of students enrolled in special education qualified under a primary disability category of specific learning disability, autism or speech and language impairment. Between 2019-20 and 2024-25, the number of students who qualified for special education under the disability category of autism increased from 567 to 842, a 48.5% increase, according to the district's California Longitudinal Pupil Achievement Data System reports. This growth aligns with statewide trends in special education identification for autism.

Access for Students to the Least Restrictive Environment

The Individuals with Disabilities Education Act (IDEA) requires that students with disabilities be offered a free appropriate public education and be educated in the least restrictive environment (LRE). The district did not meet two of the three indicators for school-age LRE on its most recent Local Level Annual Performance Report. Consequently, the district's highest priority should be increasing the number of school-age students with disabilities served in general education settings for more than 80% of their school day.

Across the state, many school districts have reduced or phased out self-contained special day class (SDC) programs for students with mild-to-moderate support needs to maximize their access to general education settings. Montebello Unified, however, continues to enroll a relatively high number of students in SDCs. To address this, the district should prioritize the expansion and support of its push-in and collaborative teaching programs. Doing so would help reduce reliance on SDCs and give more students with mild-to-moderate support needs better access to general education settings.

Special Education Staffing

Central Office

The district has 0.62 more full-time equivalent (FTE) administrator/leadership positions and 2.82 more FTE administrative support positions in its Special Education Department than the surveyed comparable school districts.

Resource Specialist Program

Districtwide, resource specialist program (RSP) staffing is 0.26 FTE above the level required to meet the Education Code (EC) 56362(c) caseload standard. However, students receiving RSP support are not evenly distributed into groups of 28 — the maximum caseload allowed by EC 56362(c) — across district schools, and the district is attempting to implement an inclusive model. Thus, having more staffing than is required to meet the EC 56362(c) standard may be necessary to meet student needs.

In addition, as described in the "Continuum of Service Options" section of this report, the district did not meet two of the three indicators measuring school-age LRE on its annual performance report. To address this, the district may need to increase resource specialist staffing beyond the 1-to-28 teacher-to-student ratio to ensure students have sufficient access to their LRE. In making this determination, the district needs to consider factors such as the specialized academic instruction (SAI) minutes specified in students' IEPs and the percentage of time they spend in general education. The industry standard for SAI-based programs supporting students in their LRE is 20 to 24 students per special education teacher.

Special Day Class Programs

The districtwide caseload average for mild-to-moderate SDC teachers is within the industry standard range at the elementary school level but falls below the standard at the intermediate and high school levels. The district needs to evaluate whether increasing staffing at these levels would improve services for students.

Caseload averages for school-age autism and preschool SDC programs are within the industry standard range. The district needs to continue monitoring staffing and caseloads in these programs to ensure they are adequate to meet student needs.

Therapeutic and extensive support needs SDC caseload averages are within the industry standard range at all levels except high school. The district needs to evaluate whether additional staffing for high school therapeutic and extensive support needs SDCs would allow it to provide better service to students.

Special Education Instructional Assistants

The district uses staffing guidelines to assign special education instructional assistants to SDCs, which is a positive practice. However, the Special Education Department does not use an adult-to-student staffing ratio, so some classes may be over- or understaffed. In 2024-25, instructional assistant staffing for the SDCs analyzed was eight positions higher than industry standards. The district should evaluate whether adopting an adult-to-student staffing ratio would allow it to reduce staffing slightly while still meeting student needs.

In 2024-25, the district assigned 109 staff members to provide 1-to-1 student support, referred to as additional adult assistance. Although there is no industry standard for comparison, this level is high for a school district of Montebello Unified's size compared to what is observed across the state. Assigning more 1-to-1 support than necessary is costly and, despite good intentions, may hinder student learning. As outlined in the "Causes and Consequences of High 1-to-1 Student Support Staffing" section of this report and in research from the University of Colorado at Denver's Paraprofessional Resources and Research Center, excessive reliance on 1-to-1 assistance can negatively affect student outcomes. The district needs to consider implementing the recommendations in the "Best Practices in 1-to-1 Student Support Assignment" section of this report to reduce its dependence on 1-to-1 student support.

Related Service Providers

The district is staffed above the industry standard for credentialed school nurses, occupational therapists (OTs), and physical therapists (PTs). It needs to evaluate whether staffing for credentialed school nurses can be reduced to align with industry standards while still meeting student needs. The district has historically contracted with a nonpublic agency for all OT and PT services and needs to perform a cost-benefit analysis to determine whether hiring its own OTs and/or PTs would be more cost-effective. If the district hires its own staff, it should use industry standards and review student needs to determine the appropriate number of FTEs.

Speech and language pathologist (SLP) staffing is below the Education Code maximum for speech and language pathologists (SLPs) who support students in the preschool program and SLPs who support students in both preschool and school-age programs. The district needs to review caseload projections, assessment loads, the number of schools served, travel time between schools, direct and consultation service minutes, and student needs to determine whether SLP staffing levels should be adjusted.

Professional Learning

The district needs to prioritize professional learning for its instructional staff that aligns with *One System: Reforming Education to Serve All Students, Report of California's Statewide Task Force on Special Education*. This includes training in universal design for learning (UDL) and MTSS. Districtwide professional learning needs to continue to emphasize inclusive practices and expand to cover UDL, differentiation strategies, and effective use of accommodations and modifications. In addition, the district needs to begin providing annual training for staff serving as administrative designees at IEP meetings and ensure that all special education instructional assistants receive nonviolent crisis intervention training.

Unrestricted General Fund Contribution to Special Education

In 2024-25, the district's adjusted unrestricted general fund contribution to special education is projected at $71,880,645, or 76.5% of total special education costs. This percentage is projected to remain unchanged in 2025-26.

Transportation

The district's Transportation Department coordinates transportation for special education students with transportation listed as a related service in their IEPs who attend schools within district boundaries. However, the Special Education Department coordinates transportation for special education students placed in programs outside the district using external contractors, nonpublic school-provided transportation, or reimbursing parents who provide the transportation themselves. This split model is inefficient and costly. The district needs to assign responsibility for all transportation services to the Transportation Department, enabling it to evaluate thresholds for transitioning students from external transportation contractors to district-operated services. Such coordination could reduce costs while continuing to meet student needs.

The district does not separate the costs of general education and special education home-to-school transportation or track special education transportation expenditures under Function 3600 in the Standardized Account Code Structure (SACS). It also does not track the costs of transportation activities such as cocurricular and extracurricular trips or consistently separate maintenance expenses for maintenance and operations vehicles from student transportation costs, limiting its ability to accurately charge departments for their share of costs.

The district needs to begin recording transportation expenditures separately for general education and special education home-to-school transportation programs so the cost of each program can be known. In addition, all special education transportation expenditures must be properly reported under Function 3600 in SACS to maximize reimbursement following the Budget Act of 2022, as described in the "State Funding for School Transportation" section of this report.

Findings and Recommendations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

> The mission of the Special Education Department is to provide our school community with the skills needed to maximize the learning of all students, in an inclusive environment, through leadership and mentoring, for the benefit of our diverse society.

Also consistent with the 2015 report on one system, the director of special education reports to the assistant superintendent of student services, who participates in the superintendent's administrative cabinet meetings. This structure provides a direct line of communication and ensures that students with disabilities are considered in districtwide planning. Staff reported that collaboration between the Special Education Department and the Educational Services, Human Resources and Business Services departments has increased in recent years. In addition, special education instructional staff are now included in districtwide and schoolwide professional learning, which is a positive practice.

Despite these positive practices, many staff interviewed reported that the Special Education Department has historically functioned as a "district within the district" and continues to do so. They described the district's special education program as a place where students with disabilities go to receive a separate education rather than a system of supports designed to serve them in general education. Interviewees cited examples, such as general education teachers calling out in hallways that they had several kids who need to transfer to special day classes. Such practices suggest that many educators do not view students with disabilities as general education students best supported by both general and special education staff. Without a shared belief in the principles of inclusive education, the district lacks the foundation necessary to build the inclusive, coherent education system envisioned in the 2015 report on one system.

Also incongruent with the principles outlined in the 2015 report on one system, many staff interviewed reported that at certain schools, general education programs quickly refer students for special education assessments as soon as a learning difference is observed, rather than first implementing accommodations and supports within general 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.

The district has started work to shift this mindset and equip staff with the tools needed to implement inclusive practices that support all students, including those with IEPs. It has developed a CDE Compliance and Improvement Monitoring (CIM) plan "to increase the participation of students with IEP's in general education settings throughout their school day as appropriate to meet their individual needs." The plan identifies professional learning focused on inclusive practices. To complement this effort, FCMAT provides additional recommendations for further building staff capacity, and these are outlined in the "Professional Learning Plan" section of this report.

Recommendations

The district should:

1. Continue to ensure the Special Education Department and other departments meet regularly to promote positive outcomes for all students, including students with disabilities.
2. Continue including special education instructional staff in districtwide and schoolwide professional learning.
3. Continue efforts to promote an inclusive mindset and expand the implementation of inclusive practices across the district.

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 census day enrollment for (TK-12) declined by 3,897 students, as shown in Figure 1 below.

Census Day Enrollment of District Students in Grades TK-12, 2020-21 — 2024-25

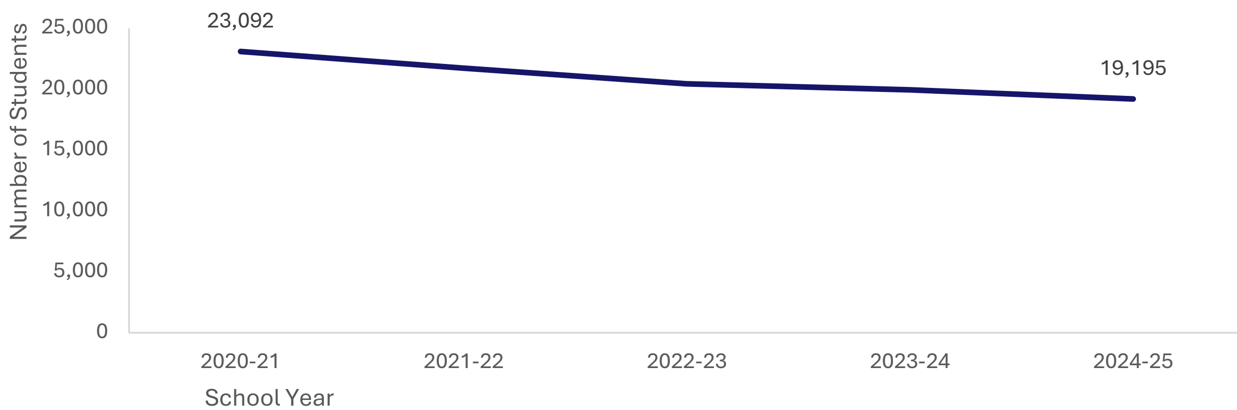

Figure 1. A graph showing that district TK-12 census day enrollment declined from 23,092 students in 2020-21 to 19,195 students in 2024-25.

Source: Enrollment for Charter and Non-Charter Schools - Montebello Unified (CDE).

Between 2020-21 and 2024-25, the district's census day TK-12 special education enrollment increased by 229 students, as shown in Figure 2 below.

District Special Education Enrollment in Grades TK-12, 2020-21 — 2024-25

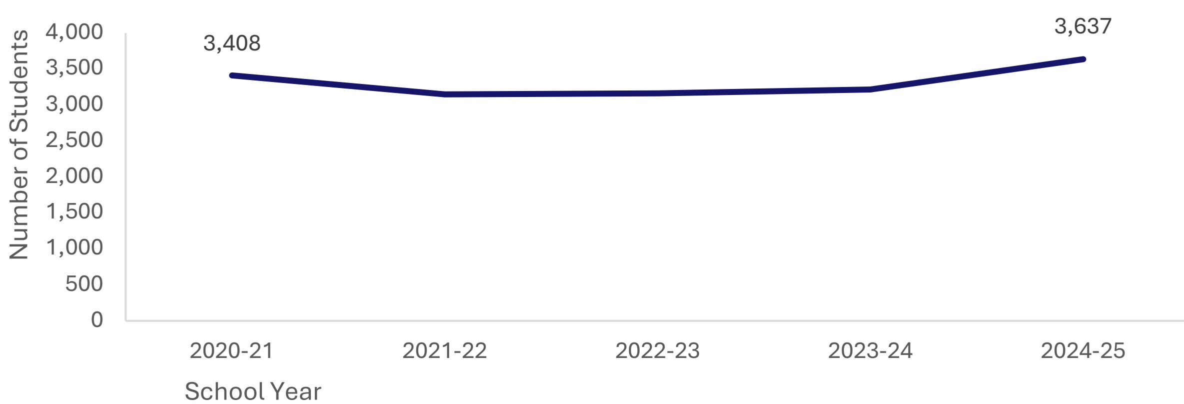

Figure 2. A graph showing that district TK-12 special education enrollment increased from 3,408 students in 2020-21 to 3,637 students in 2024-25.

Source: Enrollment for Charter and Non-Charter Schools - Montebello Unified (CDE).

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 66% of students in special education, which mirrors the statewide average calculated from DataQuest. By contrast, students who identify as female make up 48% of all students but only 34% 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 96% of the district's students enrolled in special education qualified under one of the five categories listed in Table 1 below.

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

	Autism	Intellectual Disability	Other Health Impairments	Specific Learning Disability	Speech and Language Impairment
2019-20	15.83%	4.78%	14.30%	41.50%	18.85%
2024-25	21.93%	4.71%	15.11%	35.40%	18.75%
Difference	**6.10**	**-0.07**	**0.81**	**-6.10**	**-0.10**

Source: California Longitudinal Pupil Achievement Data System (CALPADS) report 16.1 for 2019-2020 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 five most common in the district.

According to DataQuest, in 2024-25 specific learning disabilities constituted the majority of identified disabilities statewide, followed by autism and speech and language impairments. In 2024-25, a higher percentage of district students were eligible for special education due to a specific learning disability compared to the state average (35.40% versus 31.66%). Consistent with statewide trends, autism and speech and language impairment were the next two most common categories, representing 21.93% of district students (compared to 21.67% statewide) and 18.75% (compared to 21.09% statewide), respectively.

From 2019-20 through 2024-25, the number of district students qualifying for special education under the disability category of autism increased from 567 to 842 — an increase of 48.50%, according to 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 three groups that together accounted for approximately 99% of district enrollment.

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

	Asian	Hispanic or Latino	White
Percentage of Total Enrollment	2.20%	95.81%	0.84%
Percentage of Special Education Enrollment	1.24%	96.81%	0.93%
Difference	-0.96	+1.00	+0.09

Source: Enrollment by Ethnicity for Charter and Non-Charter Schools in 2024-25 - Montebello Unified (CDE).

English Learners in Special Education

According to DataQuest, in 2024-25 English learners represented 25.13% of all district TK-12 students but 36.60% 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. The district needs to use the WestEd brief as a guide to investigate its higher-than-expected identification of English learners in special education and provide professional learning as necessary.

District Special Education Enrollment Compared to Countywide and Statewide Enrollment

According to DataQuest, the percentage of district TK-12 students enrolled in special education increased by 4.19 percentage points, from 14.76% in 2020-21 to 18.95% in 2024-25.

FCMAT compared the district's total TK-12 enrollment and special education enrollment in 2024-25 with countywide and statewide figures, as shown in Table 3 below.

Table 3. Comparison of TK-12 Total and Special Education Enrollment, 2024-25

	Montebello Unified	Los Angeles County	California
Grades TK-12 Total Enrollment	19,195	1,275,769	5,806,221
Grades TK-12 Special Education Enrollment	3,637	188,745	827,105
Percentage	18.95%	14.79%	14.25%

Sources: Enrollment for Charter and Non-Charter Schools - Montebello Unified (CDE), Enrollment for Charter and Non-Charter Schools - Los Angeles County (CDE), and Enrollment for Charter and Non-Charter Schools - State (CDE).

The district identified a higher percentage of TK-12 students as requiring special education than both Los Angeles County and the state. The district needs to monitor this data and ensure it only identifies qualifying students with disabilities for special education. 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 typically developing peers, 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-12 enrolled in special education increased by 4.19 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 lack of a multitiered system of supports (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 a 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.

Staff reported that many years ago, the district developed and provided training on a districtwide SST and grade level intervention teams (GLIT) process to collaboratively determine intervention and support strategies for students. However, today, the district does not have a districtwide SST process, require that schools use this process or regularly monitor SST-related data across its schools. Staff indicated that some schools have an SST or SST/GLIT process and are collaboratively determining academic, behavioral and/or social-emotional interventions and support strategies for students. Staff reported that some of those schools effectively provide intervention and support for students in the general education program. But some schools were reported not to use an SST or SST/GLIT process, and the SST/GLIT process at other schools was reported not to support students in the general education program because of factors such as the following:

- Post-pandemic learning loss and lower academic performance due to gaps in school attendance among certain students who do not have a disability. Staff reported that some students are believed to need specialized instruction from a special education teacher or placement in a special day class setting instead of the general education teacher accommodating their learning needs and/or receiving general education interventions.
- An overall lack of schoolwide intervention and support opportunities.

- 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 and GLIT procedures being circumvented entirely. Staff reported that certain general education teachers coach parents to write a letter formally requesting a special education assessment for a student who has not gone through the SST/GLIT process. Staff indicated that in some instances, general education teachers write the special education assessment request letter themselves.

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 (RtI^2) and positive behavioral interventions and supports (PBIS).

Response to Instruction and Intervention (RtI^2)

Response to instruction and intervention 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 RtI^2 to indicate a general education approach of high-quality, culturally responsive differentiated instruction and early intervention, prevention, and behavioral strategies. RtI^2 uses universal screening and data analysis of all students' learning progress in the general education classroom.

A comprehensive districtwide RtI^2 system not only prevents the inappropriate identification of students for special education but also ensures the delivery of services within students' LREs. An RtI^2 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 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 does not have a formal MTSS to address a student's academic, behavioral and/or social emotional needs. This means that a student at one district school may have greater access to intervention in the general education program than a student at a different district school. Many staff reported that placement in the special education program is viewed as the main intervention at certain district schools.

Academic Support

While the district has not developed tiered academic supports and interventions, the Educational Services Department has focus areas intended to support high-quality, evidence-based instruction for all students. These are part of Tier 1, the universal supports for all students, of the academic support system of a comprehensive MTSS. The Educational Services Department's districtwide focus areas include:

- Implementing discourse learning strategies, which are strategies that foster student engagement and critical thinking.
- Cognitively guided instruction in mathematics.
- How to use the core curriculum and strategies to support algebra readiness and completion.
- Writing.
- English language development strategies.

The district also has some districtwide academic intervention opportunities. Post-pandemic, the district implemented accelerated learning labs, which offer intervention during the school day focused on skills such as foundational literacy and mathematics. The accelerated learning labs did not operate last school year, but in the 2025-26 school year every school will have an accelerated learning lab teacher. In addition, after-school tutoring, focused on literacy and mathematics, has been offered throughout the district.

Absenteeism

In 2023-24, according to the California School Dashboard, 20.6% of the district's TK-12 students were chronically absent, which means they were absent for 10 percent or more of the instructional days that they were enrolled. This is two percentage points higher than the statewide rate of 18.6% for that same year.

As previously mentioned, staff view post-pandemic absenteeism as a factor that increases special education identification in the district. Most groups interviewed reported that because students who are chronically absent often display learning loss and lack skills compared to their peers, they may be referred for a special education assessment since there are limited districtwide academic interventions to support students who are performing at a lower level than their peers.

The district uses a school attendance review board (SARB), composed of representatives from the school and other youth-serving agencies, to link families of students who are chronically absent to available school and community resources. Staff reported that the SARB process creates a lot of referrals for special education assessments where students are not suspected of having a disability but are thought to need intervention and support. As previously mentioned, identifying a student for special education before implementing general education interventions does not best serve the student, and serving a student in special education through an IEP is costlier than serving one through interventions and general education supports.

Many districts address chronic absenteeism through their districtwide MTSS to provide structured attendance support and interventions for students to reduce their chronic absenteeism rate. By not doing so, this district may not be addressing certain student needs and may be increasing its identification rate for special education and special education costs.

Behavioral and Social-Emotional Support

Staff reported that all district schools have received training in and are implementing PBIS. Staff interviewed viewed PBIS as supporting positive student behavior as designed. In addition, the district has developed districtwide tiered mental health interventions. These positive practices should be continued.

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 because general education interventions and supports are lacking at their school. Staff said that they believe if they do not qualify the student for special education, the student will not receive support in the general education program to address their needs.

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 as a case manager or related service provider to exit a student from special education in this district: if caseload numbers decrease, the staff member may need to move to a different school or be split between two schools. In addition, the contract between the district and the teachers' association specifies that certain special education staff will receive a class size overage or caseload overage stipend if they serve more than a certain number of students. This may deter certain staff from recommending a student be exited from special education. 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.

The following three strategies could help the district evaluate its special education entry and exit data and eligibility determination procedures:

1. Analysis of its special education entry and exit data by at least school, grade level, and disability category to determine if there are notable trends. The district needs to consider using the 2020 Policy Analysis for California Education (PACE) brief, Students with Disabilities in the CORE Districts as a guide. In this brief, PACE used data from the CORE districts (Fresno, Garden Grove, Long Beach, Los Angeles, Oakland, Sacramento, San Francisco, and Santa Ana) and noted how students in these LEAs entered and exited special education and transitioned between special education disability categories. The district could compare its special education entry and exit data to trends identified in this PACE brief.
2. Collaboration with other districts to identify post-COVID-19 pandemic special education entry and exit trends. The district would benefit from discussing challenges and best practices related to special education entry and exit in this post-pandemic context.
3. A review of 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 would be redacted from each assessment, and an attorney or expert witness (e.g., school psychologist or speech and language therapist) would 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. Staff indicated training on Section 504 plans has not been provided in at least the last five years. The district needs to assess whether additional training and support for the Section 504 process is necessary to appropriately support its students.

Recommendations

The district should:

1. Set an expectation that all schools use a common SST process, and monitor, support, and require its consistent use.
2. Establish a districtwide MTSS, with tiers of interventions and supports to address a student's academic, behavioral, and social-emotional differences and needs. Provide training for all schools, and monitor, support and require its consistent use.
3. Develop districtwide attendance supports and interventions. Provide training for all schools, and monitor, support and require consistent use of these supports and interventions.
4. Begin collecting data on special education assessment requests that come out of the SARB process. Determine what percentage of these students qualify for special education.

5. Consider providing training for individuals participating in the SARB process addressing at least the following: Child Find, the district's SST process, districtwide intervention opportunities outside of special education, and the special education eligibility determination process.
6. Analyze its special education entry and exit data at least by school, grade level, and disability category to identify trends. Consider comparing its special education entry and exit data to trends identified in the 2020 Policy Analysis for California Education (PACE) brief, Students with Disabilities in the CORE Districts.
7. Collaborate with the other CORE districts to discuss post-pandemic special education identification trends, challenges, and best practices.
8. Provide professional learning for special education 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.
9. Assess its Section 504 procedures and processes and determine whether additional training and/or support are needed.

Continuum of Service Options

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, their 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 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 two 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	60.00%	≥45.00%	Yes
6b	Preschool LRE: Separate Class	0.95%	<27.00%	Yes
6c	Preschool LRE: Home	7.62%	<3.50%	No

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

School-age Least Restrictive Environment

In 2023-24, the district's Local Level Annual Performance Report indicated it met one 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%	40.21%	≥64.00%	No
5b	LRE Rate: In Regular Class Less than 40%	35.39%	<15.00%	No
5c	LRE Rate: Separate Schools	1.89%	<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 and decrease the percentage of students it serves in separate classes. The district has developed a CIM plan "to increase the participation of students with IEP's in general education settings throughout their school day as appropriate to meet their individual needs." Through its CIM plan, the district has identified why it does not meet indicators 5a and 5b for LRE and outlined strategies and activities it will use to improve its performance.

District Continuum of Service Options

Each SELPA must ensure that a continuum of program options is available to meet the needs of students eligible for special education and related services, as required by the IDEA (EC 56360). Montebello Unified meets this requirement by offering the following special education programs and services.

Preschool Special Education Programs

The district offers the following preschool special education programs for qualifying 3-year-old students:

- **Walk In Services –** Related service providers, such as speech and language pathologists, occupational therapists, physical therapists, and specialized teachers provide special education services to preschool-age students at their home school.
- **Head Start –** Students with an IEP can access this federally funded general education preschool program. Special education services are provided through a collaborative model that includes consultation with staff, and/or specialized academic instruction in their Head Start classroom or in a separate classroom.
- **Language Lab –** The Language Lab supports preschool-age students with language-based needs. A speech and language pathologist provides instruction, either two or three times weekly, focused on language-based school readiness activities.
- **Early Intervention Classroom –** These separate self-contained classes provide a small group setting and focus on school readiness and specialized academic instruction. They are taught by an education specialist with an early learning certification.

School-Age Special Education Programs

All district schools offer special education services, but highly specialized services for certain students with disabilities are available at specific schools. The district offers numerous special education programs for school-age students, as described below.

Resource Specialist Program

All district schools serving students in grades TK-12 offer a RSP where students are in a general education classroom for most of the school day. Services focus on providing access to grade-level content with grade-level peers, as well as individualized instructional supports. Students in this program receive services such as consultation with the student, parent, and general education staff; direct instructional services to the student within the general education classroom; and/or direct instruction to the student using a "pull-out" approach where more individualized instruction is provided in a separate setting. The primary goal is to return the students to full-time enrollment in the general education program.

Separate Class or Special Day Class

Some district schools offer separate, smaller classes with specialized services. Students in this program are assigned for most of the day to a separate multigrade class, which is taught by a special education teacher. The district provides the following SDC programs:

- **Cross-Categorical (Mild-to-Moderate Support Needs) –** SDCs in which instruction is based on the general education core curriculum using modified and/or alternative instructional strategies.
- **Cross-Categorical (Moderate Support Needs) –** SDCs in which instruction is based on an alternative curriculum that focuses on applied or functional academics. This program emphasizes daily living and prevocational skills and includes instruction in community sites apart from the school campus.
- **Functional Life Skills (Extensive Support Needs) –** SDCs in which the curriculum is focused on life skills, is chronologically age-appropriate, and taught in natural environments and integrated settings. The goal is for students to learn functional skills for their current and future home, school, community, and work environments.
- **Applied Behavior Analysis (ABA) Self-Contained Classes –** SDCs that provide a therapeutic classroom environment where the primary focus is on behavior control and social and emotional development. Students receive instruction in the general education core curriculum using modified and/or alternative instructional strategies when necessary.
- **Sensory Self-Contained Classes –** SDCs in which students are instructed using techniques specifically designed for children with autism. The goal is for students to learn functional skills and receive support with their sensory needs.
- **Transition Program –** SDCs for adult students until they are 22 years of age. Programming is designed to assist students with disabilities to transition from school to employment.

Out-of-District Programs

In addition to in-district program options, some district students with IEPs attend an out-of-district regional program, a state special school, or a nonpublic school (NPS). State special schools are operated by the state and support the needs of certain students requiring a special school who are visually impaired, deaf, or hard-of-hearing. NPSs are privately operated, publicly funded schools that specialize in providing educational services for students with exceptional needs that cannot be met in a traditional public school setting.

District Continuum of Services in the Least Restrictive Environment

Overall, the district offers a full continuum of special education options and services. However, the district's most recent Local Level Annual Performance Report indicates it needs to increase the percentage of school-age students it serves in the general education program and decrease the percentage of those served in separate classes. Access to general education settings and fostering interactions with neurotypical peers are essential for maximizing the performance and outcomes of students with disabilities. Therefore, the district needs to prioritize the LRE and support its continuum of service options that facilitate access to general education settings for these students.

While many districts across the state have reduced or phased out self-contained SDC programs for students with mild-to-moderate support needs to maximize access to general education settings, the district continues to offer this type of SDC. Staff reported students in SDCs for students with mild-to-moderate support needs are largely excluded from general education classes at most district schools. In fact, students in these classes were not even included in general education physical education classes until recently. Most districts across the state that continue to offer limited SDCs for students with mild-to-moderate support needs provide opportunities for students to be included in general education for academic, elective, and physical education classes, depending on student needs.

Districts that have reduced enrollment in SDCs for students with mild-to-moderate support needs often do so by implementing collaborative teaching models where the special education teacher supports students with IEPs in general education settings. Coteaching, one such collaborative instructional delivery method, offers targeted support for students with disabilities within inclusive general education settings. Empirical studies of inclusive classrooms, where general education and special education teachers collaborate in instruction, indicate improved learning outcomes for students with learning disabilities. These findings are discussed in the 2010 report, Co-Teaching in Urban Secondary School Districts to Meet the Needs of All Teachers and Learners.

Staff reported some collaborative teaching takes place at Montebello High School, and the program is viewed positively by staff who were interviewed. The broader adoption of collaborative teaching may be hindered by a lack of training across the district. Additionally, staff reported that certain district educators believe students with disabilities enrolled in SDCs for students with mild-to-moderate support needs are best served in these programs. However, this belief contradicts the findings in the 2015 report on one system, which explains that the performance and outcomes of students with disabilities improve with increased access to general education settings. Prioritizing teacher training and subsequently expanding and supporting the coteaching program could reduce enrollment in SDCs for students with mild-to-moderate support needs, offering more inclusive opportunities for students with disabilities in general education settings.

Emphasizing high expectations for students with disabilities, fostering staff collaboration, and promoting access to general education for students with disabilities need to be key priorities for the district. The district needs to particularly focus on supporting and expanding its coteaching program, providing ongoing professional learning for both general and special education teachers, special education instructional assistants, related service providers, administrators, and other staff. This approach needs to be aligned with the evidence-based practices identified in the 2015 report on one system, as described in the "Professional Learning Plan" section of this report.

Recommendations

The district should:

1. Increase the number of students with disabilities educated in general education settings and decrease the number of students with disabilities educated in separate settings such as SDCs.
2. Monitor what percentage of the school day students with IEPs spend in general education settings, with a focus on meeting or exceeding LRE targets in its Local Level Annual Performance Report.
3. Consider providing teacher training to expand and support the coteaching program and reduce enrollment in SDCs for students with mild-to-moderate support needs.
4. Continue to follow its CIM to prioritize improving access for students to their LRE.

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 9.00 FTE administrator/leadership positions supporting its preschool 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	1	1.00
Teacher on Special Assignment (TOSA) - Elementary	1	1.00
TOSA – Moderate-to-Severe Support Needs	1	1.00
TOSA – Transition Partnership Program (TPP)	1	1.00
Speech and Language Pathologist on Special Assignment (SLPOSA)	1	1.00
Compliance	1	1.00
Behavior Unit Lead	1	1.00
Board Certified Behavior Analyst/Designated Instruction and Services (BCBA/DIS) Lead	1	1.00
Total	9	9.00

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 9.00 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
Executive Assistant	1	1.00
Data and Compliance Specialist	1	1.00
Administrative Assistant	2	2.00
School Records Technician	1	1.00
Senior Office Assistant	4	4.00
Total	9	9.00

Source: District-provided data.

Note: One of the senior office assistant positions was not filled at the time of FCMAT's study.

Special Education Staffing Comparison

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

- **Central Office Administrator/Leadership Positions –** Roles such as directors, assistant directors, coordinators, program specialists, and TOSAs. These positions do not need to 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 Montebello Unified Special Education Department central office staffing with data from the seven school districts that participated in FCMAT's survey. On average, these school districts have 8.38 FTE administrator/leadership positions supporting special education in the central office, while Montebello Unified reports a slightly higher level of staffing of 9.00 FTE. For special education administrative support positions in the central office, the comparison school districts average 6.18 FTE, whereas Montebello Unified reports a higher level of staffing of 9.00 FTE.

Table 8. Administrator and Administrative Support Position Staffing Comparison

District	County	2024-25 Census Day Enrollment	2024-25 Census Day UPP%	2024-25 Administrator/ Leadership Position FTE	2024-25 Administrative Support Position FTE
ABC Unified	Los Angeles	17,612	61.52%	5.00	6.00
Beaumont Unified	Riverside	19,503	59.97%	8.00	4.00
Colton Joint Unified	San Bernardino	18,414	86.99%	9.00	4.00
Compton Unified	Los Angeles	19,430	91.74%	6.00	6.00

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.

District	County	2024-25 Census Day Enrollment	2024-25 Census Day UPP%	2024-25 Administrator/ Leadership Position FTE	2024-25 Administrative Support Position FTE
Fairfield-Suisun Unified	Solano	20,359	67.51%	11.00	11.50
Hayward Unified	Alameda	19,954	80.70%	8.00	6.00
Pajaro Valley Unified	Santa Cruz	17,089	81.55%	11.65	5.75
Average FTE				**8.38**	**6.18**
Montebello Unified	Los Angeles	19,195	89.47%	9.00	9.00

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

Notes: Montebello Unified 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.

Montebello Unified has 0.62 FTE more administrator/leadership positions and 2.82 FTE more administrative support positions facilitating the special education program compared to the surveyed school districts.

Recommendations

The district should:

1. Determine whether the current number of administrative support positions in the Special Education Department is needed.

Special Education Teacher Staffing

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

Resource Specialist Program Teachers

The RSP provides targeted instructional support and services to students with special education needs. RSP teachers play a critical role in managing caseloads, developing IEPs, and collaborating with general education teachers to support student success.

Education Code 56362(c) states:

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

The contract between the district and the teachers' association specifies that RSP teachers will receive a class size overage stipend if they serve more than 27 students (TK through grade 5) and 24 students (grades 6 through 12).

In 2024-25, the district had 65.9 FTE RSP teachers. Based on caseload estimates provided by the district, these teachers managed the cases of 1,838 students, averaging 27.89 students per teacher, as shown in Table 9 below.

Table 9. Resource Specialist Teacher Staffing, 2024-25

School Level	Total Teacher FTE	Total Student Caseload	Average Teacher Caseload	Staffing Needed to Meet Education Code Standard	Staffing Above (+) or Below (-) Education Code Standard
Elementary School	26.4	782	29.62	27.93	-1.53
Intermediate	16.0	441	27.56	15.75	+0.25
High School	23.5	615	26.17	21.96	+1.54
Total	65.9	1,838	27.89	65.64	+0.26

Sources: District-provided data and EC 56362(c).

In 2024-25, the districtwide resource specialist staffing was 0.26 FTE more than what is required to meet the EC 56362(c) caseload standard. Since the students who receive support from a resource specialist are not neatly distributed into groups of 28 across district schools, having more staffing than is required to meet the EC 56362(c) standard may be necessary. In addition, the standard outlined in EC 56362(c) is based on a maximum caseload, which is higher than the statewide caseload average observed in LEAs that serve students using an inclusive model.

Although the definition of an inclusive model varies across California's school districts, the intent of such a model is to enable students to attend their neighborhood schools, progress through the grade levels that match their chronological ages, and access general education classes and curricula to the greatest extent possible. As described in the "Continuum of Service Options" section of this report, the district did not meet two of the three indicators that measure school age LRE on its annual performance report. Accordingly, increasing resource specialist staffing to exceed the 1-to-28 teacher-to-student ratio may be needed to provide sufficient services to increase students' access to their LRE. To determine this, the district needs to consider factors such as the number of SAI minutes in a student's IEP and the percentage of time a student is in general education. The industry standard for SAI-based programs supporting students in their LRE is 20-24 students per special education teacher.

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 SDC teachers will receive a class size overage stipend if they serve more than the number of students listed in Table 10 below, which also shows the industry standard caseload range.

Table 10. District Class Size Numbers and Industry Standards for Special Day Class Programs

Program Type	District Class Sizes for Overage Stipends in the Collective Bargaining Agreement	Industry Standard Caseload Range
Mild/Moderate Support Needs Special Day Class – Noncategorical	TK – Grade 5 – 14 students per 1 teacher Grades 6-8 – 17 students per 1 teacher Grades 9-12 – 18 students per 1 teacher	Transitional Kindergarten through Grade 12 – 12-15 students per 1 teacher
Extensive Support Needs Special Day Class – Noncategorical	TK – Grade 5 – 9 students per 1 teacher Grades 6-8 – 13 students per 1 teacher Grades 9-12 – 14 students per 1 teacher	Transitional Kindergarten through Grade 12 – 10-12 students per 1 teacher
Special Day Class – Autism Focus	TK – Grade 5 – 9 students per 1 teacher Grades 6-8 – 12 students per 1 teacher Grades 9-12 – 12 students per 1 teacher	Transitional Kindergarten through Grade 12 – 8-10 students per 1 teacher
Therapeutic Special Day Class – Mental Health and Behavioral Support Needs	TK – Grade 5 – 9 students per 1 teacher Grades 6-8 – 12 students per 1 teacher Grades 9-12 – 14 students per 1 teacher	8-10 students per 1 teacher

Sources: District collective bargaining agreement and industry standards.

Notes: The district's collective bargaining agreement lists additional class size maximums for additional types of SDCs. This table reports ones where there is an industry standard for comparison.

The district's special education SDC class size numbers for overage stipends are higher than the industry standards for the following programs:

- Mild/moderate support needs special day class – noncategorical (grades 6-12).
- Extensive support needs special day class – noncategorical (grades 6-12).
- Special day class – autism focus (grades 6-12).
- Therapeutic special day class – mental health and behavioral support needs (grades 6-12).

Mild-to-Moderate Special Day Class Programs

In 2024-25, the district had 77.0 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 1,149 students, averaging 14.92 students per teacher, as shown in Table 11 below.

Table 11. Mild-to-Moderate Special Day Class Program Teacher Staffing, 2024-25

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	35.00	473	13.51	12-15 students per teacher	39.42 FTE (12 students per teacher) 31.53 FTE (15 students per teacher)	Within Industry Standard Range
Intermediate	19.0	299	15.74	12-15 students per teacher	24.92 FTE (12 students per teacher) 19.93 FTE (15 students per teacher)	-5.92 FTE (12 students per teacher) -0.93 FTE (15 students per teacher)
High School	23.0	377	16.39	12-15 students per teacher	31.42 FTE (12 students per teacher) 25.13 FTE (15 students per teacher)	-8.42 FTE (12 students per teacher) -2.13 FTE (15 students per teacher)
Total	77.0	1,149	14.92	12-15 students per teacher	95.75 FTE (12 students per teacher) 76.60 FTE (15 students per teacher)	Within Industry Standard Range

Sources: District-provided data and industry standards.

In 2024-25, the districtwide mild-to-moderate SDC teacher caseload average was within the industry standard range. However, the mild-to-moderate SDC teacher caseload average for the intermediate and high school levels was above the industry standard range. This is in part because of the district's overreliance on placing students with mild-to-moderate support needs, such as learning disabilities, in SDC programs instead of supporting and accommodating their needs in less restrictive general education settings. As mentioned in the "District Continuum of Services in the Least Restrictive Environment" section of this report, the district needs to reduce its enrollment in SDCs for students with mild-to-moderate support needs and offer more inclusive opportunities for students with disabilities in general education settings. In addition, the district needs to evaluate whether increasing mild-to-moderate SDC teacher staffing at the intermediate and high school levels would allow it to provide better service to students currently supported in these classes.

Autism Special Day Class Program

In 2024-25, the district had 15.0 FTE teachers for the autism SDC program. Based on caseload estimates provided by the district, these teachers managed the cases of 146 students, averaging 9.73 students per teacher, as shown in Table 12 below.

Table 12. Autism Special Day Class Program Teacher Staffing, 2024-25

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	12.0	112	9.33	8 -10 students per teacher	14.0 FTE (8 students per teacher) 11.2 FTE (10 students per teacher)	Within Industry Standard Range
Intermediate	2.0	22	11.0	8 -10 students per teacher	2.75 FTE (8 students per teacher) 2.20 FTE (10 students per teacher)	-0.75 FTE (8 students per teacher) -0.20 FTE (10 students per teacher)
High School	1.0	12	12.0	8 -10 students per teacher	1.5 FTE (8 students per teacher) 1.2 FTE (10 students per teacher)	-0.50 FTE (8 students per teacher) -0.20 FTE (10 students per teacher)
Total	15.0	146	9.73	8 -10 students per teacher	18.25 FTE (8 students per teacher) 14.60 FTE (10 students per teacher)	Within Industry Standard Range

Sources: District-provided data and industry standards.

In 2024-25, the districtwide autism SDC teacher staffing was within the industry standard range of 8-10 students per teacher. However, the autism SDC teacher caseload averages for the intermediate and high school levels were above the industry standard range. This is because there are just three classes at these levels, and if the district were to open an additional class, its caseload averages would be well below the industry standard range. The district needs to annually evaluate its caseload numbers and student needs to determine its staffing.

Therapeutic Special Day Class Program

In 2024-25, the district had 4.0 FTE SDC teachers of therapeutic classes for students with social-emotional and behavioral support needs. Based on caseload estimates provided by the district, these teachers managed the cases of 49 students, averaging 12.25 students per teacher, as shown in Table 13 below.

Table 13. Therapeutic Special Day Class Program Teacher Staffing, 2024-25

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	7	7.00	8 -10 students per teacher	0.88 FTE (8 students per teacher) 0.70 FTE (10 students per teacher)	+0.12 FTE (8 students per teacher) +0.30 FTE (10 students per teacher)
Intermediate	1.0	8	8.00	8 -10 students per teacher	1.00 FTE (8 students per teacher) 0.80 FTE (10 students per teacher)	Within Industry Standard Range
High School	2.0	34	17.00	8 -10 students per teacher	4.25 FTE (8 students per teacher) 3.40 FTE (10 students per teacher)	-2.25 FTE (8 students per teacher) -1.40 FTE (10 students per teacher)
Total	4.0	49	12.25	8 -10 students per teacher	6.13 FTE (8 students per teacher) 4.90 FTE (10 students per teacher)	-2.13 FTE (8 students per teacher) -0.90 FTE (10 students per teacher)

Sources: District-provided data and industry standards.

In 2024-25, the districtwide counseling enriched SDC teacher caseload average was higher than the industry standard range of 8-10 students per teacher, and the number of students per teacher at the high school level was more than double the low end of the industry standard range. This is in part because the district's class size numbers are higher than the industry standards at the intermediate and high school levels. The district needs to evaluate whether increasing SDC staffing for its high school counseling enriched SDC program would allow it to provide better service to students.

Extensive Support Needs Special Day Class Program

In 2024-25, the district had 13.00 FTE SDC teachers for students with extensive support needs. Based on caseload estimates provided by the district, these teachers managed the cases of 154 students, averaging 11.85 students per teacher, as shown in Table 14 below.

Table 14. Extensive Support Needs Special Day Class Program Teacher Staffing, 2024-25

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	5.0	52	10.40	10-12 students per teacher – cross-categorical	5.20 FTE (10 students per teacher) 4.33 FTE (12 students per teacher	Within Industry Standard Range
Middle School	3.0	32	10.67	10-12 students per teacher – cross-categorical	3.20 FTE (10 students per teacher) 2.67 FTE (12 students per teacher)	Within Industry Standard Range

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
High School	5.0	70	14.00	10-12 students per teacher – cross-categorical	1.00 FTE (10 students per teacher) 5.83 FTE (12 students per teacher	-2.00 FTE (10 students per teacher) -0.83 FTE (12 students per teacher)
Total	13.0	154	11.85	10-12 students per teacher – cross-categorical	15.40 FTE (10 students per teacher) 12.83 FTE (12 students per teacher	Within Industry Standard Range

Sources: District-provided data and industry standards.

In 2024-25, the districtwide extensive support needs SDC teacher caseload average was within the industry standard range. The extensive support needs SDC teacher caseload average is higher than the industry standard at the high school level in part because the district's class size numbers for this school level are higher than the industry standard. The district needs to evaluate whether increasing SDC staffing for its high school SDC program for students with extensive support needs would allow it to provide better service to students.

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 SDC teachers will receive a class size overage stipend if they serve more than nine students per session. The industry standards for caseload for preschool programs are shown in Table 15 below.

Table 15. 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 2024-25, the district had 10.0 FTE teachers for the preschool cross-categorical SDC program. Based on caseload estimates provided by the district, these teachers managed the cases of 111 students, as shown in Table 16 below.

Table 16. Preschool Cross-Categorical Special Day Class Program Teacher Staffing, 2024-25

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	10.0	111	11.1	10-14 students per teacher – cross-categorical	11.1 FTE (10 students per teacher) 7.93 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/moderate and extensive support needs, FCMAT used a blended industry standard caseload range of 10-14 students per teacher.

In 2024-25, the districtwide preschool cross-categorical SDC teacher caseload average was within the industry standard range.

Recommendations

The district should:

1. Continue to monitor RSP teacher staffing and caseloads to ensure they are adequate to meet the EC 56362(c) caseload standard and student needs.
2. Assess whether increasing RSP teacher staffing would allow it to support more students in their LRE and improve its performance on indicators 5a and 5b on the Annual Performance Report.
3. Evaluate whether increasing mild-to-moderate SDC teacher staffing at the intermediate and high school levels would allow it to provide better service to students.
4. Continue to monitor teacher staffing and caseloads for its autism SDC programs to ensure they are adequate to meet student needs.
5. Evaluate whether increasing SDC staffing for its high school therapeutic SDC program would allow it to provide better service to students.
6. Evaluate whether increasing SDC staffing for its high school SDC program for students with extensive support needs would allow it to provide better service to students.
7. Continue to monitor teacher staffing and caseloads for its preschool SDC programs to ensure they are adequate to meet student needs.

Special Education Instructional Assistant Staffing

Special education instructional assistants, also known as special education aides or paraeducators, are trained professionals who work with students, typically under the direction of a classroom teacher. LEAs often employ special education instructional assistants 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 assistants in its special education program under two job titles:

1. **Instructional Assistant – Special Education –** The job description states the purpose of this position is:

    > Under general supervision, provides instruction and tutors individuals and small groups of students in assigned special education programs with emotional, physical, behavioral, learning, and mental challenges and/or disabilities in various subject-matter areas to reinforce classroom lessons; observes, monitors, and records student performance and behavior; performs administrative functions in support of classroom activities; and, as assigned, performs related duties.

2. **Special Education Case Worker (As Needed) –** The job description states the purpose of this position is:

    > On an as-needed basis, under general supervision, works one-on-one with and supervises an assigned student(s) that has a severe emotional, physical and/or mental disability in order to monitor the student's behavior; observes, monitors and records student performance and behavior; and performs related duties as assigned.

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 17 below.

Table 17. 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 Assistant Staffing

The district has established instructional assistant staffing guidelines for its SDC programs. In addition, the district has begun to adjust staffing based on student enrollment and the number of staff providing additional adult support in the classroom. The district's use of staffing guidelines is a positive practice. However, even though the Special Education Department adjusts staffing depending on enrollment, it does not use an adult-to-student ratio to staff its SDCs so those classes may be over- or understaffed. Another advantage of using an adult-to-student ratio to staff SDCs may be clearer and improved communication. Assigning more instructional assistant support than necessary is costly and may limit students' opportunities to gain independence; however, not assigning enough instructional assistant 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 assistants in the adult portion of the ratio, and to remove any students who have additional adult assistance (AAA) support for most of the school day and their assigned AAA support person from the ratio.

FCMAT analyzed the district's 2024-25 instructional assistant staffing in its SDCs. If the district had allocated special education instructional assistants to its SDC programs in 2024-25 using the industry standard adult-to-student ratios, it might have been able to reduce by eight SDC instructional assistants as shown in Table 18 below.

Table 18. SDC Instructional Assistant Allocation – District Compared to Industry Standards, 2024-25

School and SDC Class	SDC Enrollment	SDC Enrollment Less Students with an AAA	No. of Special Education Classroom Support Instructional Assistant(s)	Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) to Students)	Industry Standard Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) to Students)	Classroom Support Instructional Assistant Staffing Above (+) or Below (-) Industry Standard
Bandini Elementary SDC M/M TK-3	9	8	1	2-to-8 or 0.25	1-to-7 or 0.14	Equal to Industry Standard
Bandini Elementary SDC M/M 3-5	13	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Equal to Industry Standard
Bandini Elementary SDC Extensive TK-6	11	11	2	3-to-11 or 0.27	1-to-5 or 0.20	Equal to Industry Standard
Bandini Elementary SDC Autism TK-K	10	7	1	2-to-7 or 0.29	1-to-3 or 0.33	Equal to Industry Standard

School and SDC Class	SDC Enrollment	SDC Enrollment Less Students with an AAA	No. of Special Education Classroom Support Instructional Assistant(s)	Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) to Students)	Industry Standard Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) to Students)	Classroom Support Instructional Assistant Staffing Above (+) or Below (-) Industry Standard
Bandini Elementary SDC Autism TK-2	10	8	1	2-to-8 or 0.25	1-to-3 or 0.33	Equal to Industry Standard
Bandini Elementary SDC Autism 1-2	10	9	1	2-to-9 or 0.22	1-to-3 or 0.33	1 Staff Below the Industry Standard
Bandini Elementary SDC Autism 2-3	10	7	2	3-to-7 or 0.43	1-to-3 or 0.33	Equal to Industry Standard
Bell Gardens Elementary SDC M/M TK-2	13	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Equal to Industry Standard
Bella Vista Elementary SDC M/M 1-3	13	9	1	2-to-9 or 0.22	1-to-7 or 0.14	Equal to Industry Standard
Bell Gardens Elementary SDC M/M 3-5	13	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Equal to Industry Standard
Bella Vista Elementary SDC M/M TK	11	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Equal to Industry Standard
Bella Vista Elementary SDC M/M K-1	12	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Equal to Industry Standard
Bella Vista Elementary SDC M/M 4-5	14	14	1	2-to-14 or 0.14	1-to-7 or 0.14	Equal to Industry Standard
Cesar Chavez Elementary SDC M/M TK-2	12	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Equal to Industry Standard
Cesar Chavez Elementary SDC M/M 2-4	16	15	1	2-to-15 or 0.13	1-to-7 or 0.14	Equal to Industry Standard
Cesar Chavez Elementary SDC M/M 4-5	16	16	1	2-to-16 or 0.13	1-to-7 or 0.14	Equal to Industry Standard
Fremont Elementary SDC M/M TK-3	13	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Equal to Industry Standard
Garfield Elementary SDC M/M TK-1	14	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Equal to Industry Standard

School and SDC Class	SDC Enrollment	SDC Enrollment Less Students with an AAA	No. of Special Education Classroom Support Instructional Assistant(s)	Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) to Students)	Industry Standard Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) to Students)	Classroom Support Instructional Assistant Staffing Above (+) or Below (-) Industry Standard
Garfield Elementary SDC M/M 2-3	15	15	1	2-to-15 or 0.13	1-to-7 or 0.14	Equal to Industry Standard
Greenwood Elementary SDC M/M TK-2	14	14	1	2-to-14 or 0.14	1-to-7 or 0.14	Equal to Industry Standard
Greenwood Elementary SDC M/M 3-4	17	16	1	2-to-16 or 0.13	1-to-7 or 0.14	Equal to Industry Standard
Greenwood Elementary SDC M/M 4-5	18	18	1	2-to-18 or 0.11	1-to-7 or 0.14	Equal to Industry Standard
Greenwood Elementary SDC Autism TK-K	10	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Equal to Industry Standard
Greenwood Elementary SDC Autism K	10	9	1	2-to-9 or 0.22	1-to-3 or 0.33	1 Staff Below the Industry Standard
Greenwood Elementary SDC Autism K	9	7	2	3-to-7 or 0.43	1-to-3 or 0.33	Equal to Industry Standard
Greenwood Elementary SDC Autism 1-2	9	8	2	3-to-8 or 0.38	1-to-3 or 0.33	Equal to Industry Standard
Greenwood Elementary SDC Autism 2	9	9	2	3-to-9 or 0.33	1-to-3 or 0.33	Equal to Industry Standard
Greenwood Elementary SDC Autism 2-3	9	7	2	3-to-7 or 0.43	1-to-3 or 0.33	Equal to Industry Standard
Greenwood Elementary SDC Autism 3-5	8	6	2	3-to-6 or 0.50	1-to-3 or 0.33	1 Staff Above the Industry Standard
Greenwood Elementary SDC Autism 4-5	8	6	2	3-to-6 or 0.50	1-to-3 or 0.33	1 Staff Above the Industry Standard
Joseph Gascon Elementary SDC M/M TK-1	15	14	1	2-to-14 or 0.14	1-to-7 or 0.14	Equal to Industry Standard
Joseph Gascon Elementary SDC M/M 1-2	13	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Equal to Industry Standard

School and SDC Class	SDC Enrollment	SDC Enrollment Less Students with an AAA	No. of Special Education Classroom Support Instructional Assistant(s)	Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) to Students)	Industry Standard Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) to Students)	Classroom Support Instructional Assistant Staffing Above (+) or Below (-) Industry Standard
Joseph Gascon Elementary SDC M/M 2-3	13	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Equal to Industry Standard
Joseph Gascon Elementary SDC M/M 4-5	15	14	1	2-to-14 or 0.14	1-to-7 or 0.14	Equal to Industry Standard
La Merced Academy SDC M/M TK-2	12	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Equal to Industry Standard
La Merced Academy SDC M/M 3-5	13	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Equal to Industry Standard
Suva Elementary SDC M/M TK-1	15	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Equal to Industry Standard
Suva Elementary SDC M/M 2-3	13	9	1	2-to-9 or 0.22	1-to-7 or 0.14	Equal to Industry Standard
Suva Elementary SDC M/M 4-5	11	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Equal to Industry Standard
Washington Elementary SDC M/M TK-K	14	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Equal to Industry Standard
Washington Elementary SDC M/M TK-1	11	9	1	2-to-9 or 0.22	1-to-7 or 0.14	Equal to Industry Standard
Washington Elementary SDC M/M 1-3	9	7	1	2-to-7 or 0.29	1-to-7 or 0.14	1 Staff Above the Industry Standard
Washington Elementary SDC M/M 3-5	14	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Equal to Industry Standard
Winter Gardens Elementary SDC M/M TK-2	15	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Equal to Industry Standard
Winter Gardens Elementary SDC M/M 3-5	17	17	1	2-to-17 or 0.12	1-to-7 or 0.14	Equal to Industry Standard
Wilcox Elementary SDC M/M 2-3	14	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Equal to Industry Standard

School and SDC Class	SDC Enrollment	SDC Enrollment Less Students with an AAA	No. of Special Education Classroom Support Instructional Assistant(s)	Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) to Students)	Industry Standard Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) to Students)	Classroom Support Instructional Assistant Staffing Above (+) or Below (-) Industry Standard
Wilcox Elementary SDC M/M 3-4	13	9	1	2-to-9 or 0.22	1-to-7 or 0.14	Equal to Industry Standard
Wilcox Elementary SDC M/M 4-5	13	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Equal to Industry Standard
Rosewood Park Academy SDC Extensive K-1	10	7	2	3-to-7 or 0.43	1-to-5 or 0.20	1 Staff Above the Industry Standard
Rosewood Park Academy SDC Extensive 2-3	11	11	2	3-to-11 or 0.27	1-to-5 or 0.20	Equal to Industry Standard
Rosewood Park Academy SDC Extensive 3-4	11	11	2	3-to-11 or 0.27	1-to-5 or 0.20	Equal to Industry Standard
Rosewood Park Academy SDC Extensive 4-5	9	9	2	3-to-9 or 0.33	1-to-5 or 0.20	1 Staff Above the Industry Standard
Bell Gardens Intermediate SDC Extensive 6-8	10	7	2	3-to-7 or 0.43	1-to-5 or 0.20	1 Staff Above the Industry Standard
Bell Gardens Intermediate SDC Extensive 6-8	11	10	2	3-to-10 or 0.30	1-to-5 or 0.20	1 Staff Above the Industry Standard
Macy Intermediate SDC Autism 6	11	8	2	3-to-8 or 0.38	1-to-3 or 0.33	Equal to Industry Standard
Macy Intermediate SDC Autism 6-8	11	8	2	3-to-8 or 0.38	1-to-3 or 0.33	Equal to Industry Standard
Montebello Intermediate SDC Extensive 6-8	11	10	3	4-to-10 or 0.40	1-to-5 or 0.20	2 Staff Above the Industry Standard
Bell Gardens High SDC Extensive	12	12	2	3-to-12 or 0.25	1-to-5 or 0.20	Equal to Industry Standard
Bell Gardens High SDC Extensive	12	12	2	3-to-12 or 0.25	1-to-5 or 0.20	Equal to Industry Standard

School and SDC Class	SDC Enrollment	SDC Enrollment Less Students with an AAA	No. of Special Education Classroom Support Instructional Assistant(s)	Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) to Students)	Industry Standard Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) to Students)	Classroom Support Instructional Assistant Staffing Above (+) or Below (-) Industry Standard
Bell Gardens High SDC Extensive	7	7	1	2-to-7 or 0.29	1-to-5 or 0.20	Equal to Industry Standard
Bell Gardens High SDC Extensive	13	13	2	3-to-13 or 0.23	1-to-5 or 0.20	Equal to Industry Standard
Bell Gardens High SDC Extensive	10	10	1	2-to-10 or 0.20	1-to-5 or 0.20	Equal to Industry Standard
Schurr High SDC Extensive	15	12	2	3-to-12 or 0.25	1-to-5 or 0.20	Equal to Industry Standard
Schurr High SDC Extensive	14	14	3	4-to-14 or 0.29	1-to-5 or 0.20	1 Staff Above the Industry Standard
Schurr High SDC Extensive	17	17	2	3-to-17 or 0.18	1-to-5 or 0.20	Equal to Industry Standard
Schurr High SDC Autism	12	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Equal to Industry Standard

Source: Industry standards and district-reported data.

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

The preschool SDCs, adult transition program SDCs and SDCs for students with therapeutic support needs and moderate support needs were not analyzed because FCMAT does not have an industry standard adult-to-student ratio for these types of SDCs. In addition, SDCs for students with mild-to-moderate support needs at the secondary level were also excluded from the analysis because student numbers change based on the period being taught.

Licensed vocational nurses (LVNs) were excluded from this analysis.

The districtwide instructional assistant staffing for its SDCs is slightly higher than the industry standards, in part because the district does not use adult-to-student ratios. The district needs to evaluate whether use of an adult-to-student ratio to determine instructional assistant staffing for its SDCs would allow it to reduce by a few instructional assistants and continue to meet student needs.

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. Accordingly, the district endeavors to have these staff work with more than one student whenever possible. In addition, the district does not refer to these staff as 1-to-1 instructional assistants to prevent them from being thought to support just one student throughout the day. Their job title is special education case worker (as needed), and they are referred to as “additional adult assistance support.”

Industry practice commonly refers to both the assessment process and the special education instructional assistant role as special circumstance instructional assistance (SCIA). The district uses an assessment process, called the "Determination and Implementation of Additional Adult Assistance (AAA) Support" to determine whether a student requires AAA, which could be 1-to-1 support. This process clarifies decision-making procedures and recognizes that 1-to-1 instructional assistance is a significant program decision that should be based on a thorough, data-driven evaluation that includes considering all less-restrictive alternatives. The district's AAA support assessment aligns with industry standards because it focuses on personal independence, promotes individual decision-making, works to maximize existing supports, and is based on data-driven assessment. Staff reported the district's AAA support assessment is used consistently.

In 2024-25, the district had 109 staff, 30 district employed and 79 nonpublic agency contractors, who were assigned to provide AAA support. Although there is no industry standard for comparison, this is a relatively high number of staff providing AAA support for a district of this size compared to what is observed across the state.

Causes and Consequences of High 1-to-1 Student Support Staffing

Staff explained that the number of staff providing AAA support has grown because student support needs increased following the COVID-19 pandemic and because teacher turnover results in inexperienced teachers who need additional help in certain SDCs.

As previously mentioned, assigning more instructional assistant support than necessary is costly. In addition, although a parent/guardian or staff member's request for a student to have AAA support may be well meaning, according to the University of Colorado at Denver's Paraprofessional Resources and Research Center, it can hinder the student's education in the following ways:

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

Best Practices in 1-to-1 Student Support Assignment

In addition to using an assessment to determine whether a student requires AAA support, LEAs should also identify when during the school day a student requires AAA 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 2024-25, the district had two staff who were providing AAA support to more than one student, which is a positive practice and should be continued.

Part of an SCIA assessment process focuses on planning for a student's transition to independence and developing annual IEP goals to support this. All staff interviewed reported that they write goals for independence and plans to reduce a student's reliance on AAA support when the student has met the behavior goals in their IEP. Continuing to do so is a good practice because it focuses IEP services on addressing deficit areas to strengthen skills, allows a student's IEP team to monitor annual progress, and helps them determine whether adjustments to the level of service are needed.

Recommendations

The district should:

1. Use the industry standard adult-to-student ratios to determine the assignment of special education instructional assistants to SDCs. Determine whether it can reduce the number of instructional assistants while still meeting student needs.
2. Continue to consistently use its assessment to determine whether a student requires AAA support.
3. Continue to evaluate whether a student determined to require AAA support needs it for the entire school day, or just part of it. Only assign a student AAA support when it is required.
4. Continue to determine whether staff providing AAA support for a student who only requires it for part of the school day can provide AAA support to more than one student at a school or perform other duties when the student they are assigned does not require their assistance.
5. Continue to ensure that each IEP that calls for AAA support, except for medically necessary support, includes goals for independence and a support phase-out plan that is actively monitored.

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 APE teachers, OTs, PTs, credentialed school nurses, school psychologists, and speech and language pathologists (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 19 below.

Table 19. 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

The contract between the district and the teachers' association specifies that APE teachers will receive an overage stipend if they serve more than 64 students. In 2024-25, the district had 7.0 FTE APE teacher positions, each with an average caseload of 41.29 students receiving direct services, as shown in Table 20 below.

Table 20. Adapted Physical Education Teacher Staffing, 2024-25

Provider	Number of FTE	2024-25 Total Caseload	Caseload Average	Industry Standard Provider-to-Student Ratio	FTE Needed to Meet Industry Standard	Staffing Above (+) or Below (-) Industry Standard
APE Teacher	7.0	289.0	41.29	1-to-45-55	6.42 FTE (to meet 1-to-45) 5.25 FTE (to meet 1-to-55)	+0.58 FTE (above 1-to-45) +1.75 FTE (above 1-to-55)

Sources: District-provided data and industry standards.

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

As shown in the table, the district was staffed just above the industry standard staffing level range for APE teachers in 2024-25. The district needs 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 it needs to change the number of APE teachers.

Credentialed School Nurses

The contract between the district and the teachers' association specifies it will have one credentialed school nurse for every 1,400 students. In 2024-25, the district had 16.0 FTE credentialed school nurse positions, each with an average caseload of 1,200 students, as shown in Table 21 below.

Table 21. Credentialed School Nurse Staffing, 2024-25

Provider	Number of FTE	2024 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	16.0	19,195	1,200	1-to-2,274	8.44 FTE	+7.56 FTE

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

As shown in the table, the district has approximately double the industry standard staffing levels for credentialed school nurses. The district needs to review its enrollment, special education enrollment, duties performed by credentialed school nurses, schoolwide needs, and students' needs to determine whether it can change credentialed school nurse staffing and still meet student needs.

Occupational Therapy

The district's contract with the teachers' association does not stipulate a caseload size for OTs, and staff reported that the district has historically contracted with a nonpublic agency for all its OTs.

In 2024-25, the district contracted for 16.0 FTE OT positions, each with an average caseload of 27.94 students receiving direct services, as shown in Table xx below. In 2024-25, the district contracted for one certified occupational therapy assistant (COTA).

Table 22. District Occupational Therapist Staffing, 2024-25

Provider	Number of FTE	2024-25 Total Caseload	Caseload Average	Industry Standard Provider-to-Student Ratio	FTE Needed to Meet Industry Standard	Staffing Above (+) or Below (-) Industry Standard
Occupational Therapist	16.0	447	27.94	1-to-45-55	9.93 FTE (to meet 1-to-45) 8.13 FTE (to meet 1-to-55)	+6.07 FTE (above 1-to-45) +7.87 FTE (above 1-to-55)

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 contracted for approximately double the number of FTE for OTs than needed to meet the industry standard staffing level range for OTs in 2024-25. Since the district contracts for all its OTs, it lacks control over the number of FTE assigned to support students. The district needs to perform a cost-benefit analysis to determine whether hiring its own OTs would be more cost-effective than continuing to contract for OTs. If the district hires its own OTs, it needs to 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.

Physical Therapy

The district's contract with the teachers' association does not stipulate a caseload size for PTs and staff reported that the district has historically contracted with a nonpublic agency for all its PTs.

In 2024-25, the district contracted for 2.0 FTE PT positions, each with an average caseload of 23.0 students receiving direct services, as shown in Table 23 below.

Table 23. District's Physical Therapist Staffing, 2024-25

Provider	Number of FTE	2024-25 Total Caseload	Caseload Average	Industry Standard Provider-to-Student Ratio	FTE Needed to Meet Industry Standard	Staffing Above (+) or Below (-) Industry Standard
Physical Therapist	2.0	46.0	23.0	1-to-45-55	1.02 FTE (to meet 1-to-45) 0.84 FTE (to meet 1-to-55)	+0.98 FTE (above 1-to-45) +1.16 FTE (above 1-to-55)

Sources: District-provided data and industry standards.

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

As shown in the table, the district contracted for approximately double the number of PTs needed to meet the industry standard staffing level range for PTs. As with contracted OTs, since the district contracts for all its PTs, it lacks control over the number of FTE assigned to support students. The district needs to perform a cost-benefit analysis to determine whether hiring its own PTs would be more cost-effective than continuing to contract for PTs. If the district hires its own PTs, it needs to review PT caseload projections, assessment loads, the number of schools each PT supports, driving time between schools, direct and consultation service minutes, and students' needs to determine the number of PTs needed.

School Psychologists for School-Age Programs

The contract between the district and the teachers' association specifies it will have one school psychologist for every 700 students. In 2024-25, the district had 30.0 FTE school psychologist positions serving school-age programs, each with an average caseload of 639.83 students, as shown in Table 24 below.

Table 24. School Psychologist Staffing for School-Age Programs Compared to Industry Standard, 2024-25

Provider	Number of FTE	2024 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	30.0	19,195	639.83	1-to-977	19.65 FTE	+10.35 FTE

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

Note: Only the district's 30.0 FTE school psychologists who serve school-age students were included in this staffing comparison.

As shown in the table, the district was staffed significantly above 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 psycho-educational assessments. The district employs other related service providers, such as mental health clinicians and behaviorists, who offset the workload of school psychologists by providing educationally related mental health services and behavioral support.

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.

The district needs to annually review the following items to help determine how many FTE school psychologist positions it needs:

- 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.

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.

In 2024-25, the district had a 1.0 FTE SLP who exclusively provided speech and language therapy for preschool-age students. This SLP had a caseload of 82 students, as shown in Table 25 below. The district also has 2.0 FTE SLPs who solely provide speech and language assessments and do not provide direct services for preschool-age students, so they were excluded from this analysis.

Table 25. Preschool Speech and Language Pathologist Staffing, 2024-25

Provider	Number of FTE	2024-25 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	1.0	82	82	1-to-40	2.05 FTE	-1.05 FTE

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

Note: The district's two SLPs who primarily administer preschool assessments were not included in this staffing comparison.

As shown in the table, the district has approximately half of the FTE required to meet the Education Code maximum for SLPs serving preschool-age students. The district needs to review current SLP caseload projections and students' needs to determine if it needs to increase preschool SLP staffing.

Speech and Language Pathologists Serving Students in the Preschool and School-Age Programs

Education Code 56441.7(a) establishes a maximum caseload of 40 students for SLPs serving preschool students and Education Code 56363.3 establishes a maximum caseload of 55 students for SLPs serving students ages 5-22. For SLPs serving students in both programs, FCMAT uses a blended maximum caseload of 47.5 students.

In 2024-25, the district has 26.2 FTE SLPs who work with preschool-age and school-age students. These SLPs have an average caseload of 54.62 students, as shown in Table 26 below.

Table 26. Speech and Language Pathologist Staffing for SLPs Working with Preschool-Age and School-Age Students, 2024-25

Provider	Number of FTE	2024-25 Total Caseload	Caseload Average	Industry Standard	FTE Needed to Meet Education Code Provider-to-Student Ratio	Staffing Above (+) or Below (-) Education Code Provider-to-Student Ratio
SLPs for Preschool-Age and School-Age Students	26.2	1,431	54.62	1-to-47.5	30.13 FTE	-3.93 FTE

Sources: District-provided data and EC 56441.7(a) and EC 56363.3

Note: Only preschool-age and school-age students receiving services from an SLP were included in the caseload average for comparison with the EC 56441.7(a) and EC 56363.3 maximums.

As shown in the table, the district is staffed 3.93 FTE SLPs below the FCMAT blended standard for SLPs serving both preschool-age and school-age students. The district needs to review SLP caseload projections and students' needs to determine if its staffing for SLPs serving preschool-age and school-age students is adequate.

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.

In 2024-25, the district had 10.0 FTE SLPs working exclusively with school-age students who each managed an average caseload of 46.90 students, as shown in Table 27 below. The district also has 1.0 FTE SLP who assists students with augmentative and alternative communication (AAC) devices but does not provide speech and language therapy, so they were excluded from this analysis.

Table 27. School-Age Speech and Language Pathologist Staffing, 2024-25

Provider	Number of FTE	2024-25 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	469	46.9	1-to-55	8.53	+1.47 FTE

Sources: District-provided data and EC 56363.3.

Note: The district's 1.0 FTE SLP who primarily assists students with AAC devices was not included in this staffing comparison.

As shown in the table, the district is staffed just above the Education Code maximum staffing level for SLPs for school-age programs. The district needs to continue to review SLP caseload projections and students' needs annually to determine if it needs to change its SLP staffing for school-age programs.

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. Perform a cost-benefit analysis to determine whether hiring its own OTs and/or PTs would be more cost-effective than continuing to contract for these positions. If it hires district employed OTs and/or PTs, use the industry standards and review student needs to determine how many FTE are needed.
3. Evaluate whether it can reduce its staffing for credentialed school nurses to align with industry standards while still meeting students' needs.
4. Collect quarterly data to identify patterns in referrals for initial psychoeducational assessments by school psychologists, particularly for students who do not qualify for services.
5. Review current SLP caseloads and students' needs to determine if it needs to change SLP staffing for preschool- and school-age programs.

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.

Universal Design for Learning

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, many 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.

Inclusive Practices

Interviewed staff members acknowledged that certain teachers are hesitant to discuss the inclusion of students with disabilities in general education. They speculated that this reluctance might stem from a sense of being unprepared to address the diverse needs of many students with disabilities or a lack of personal experience as either students or educators in inclusive school settings. Consequently, this hesitancy may contribute both to the district's culture and the perception among some staff members that students with disabilities, whether they have mild-to-moderate or extensive support needs, are best served in SDCs rather than general education settings. Staff reported the district has provided some training in inclusive practices. However, continued training in this area appears necessary to foster a mindset that students with disabilities can be successfully included in general education settings prior to providing training on how to do so through UDL.

The belief that students with learning differences belong in special education regardless of whether they have a disability that requires specially designed instruction may exist because of unmet professional learning needs. Many staff interviewed suggested that general education teachers need professional development addressing differentiation strategies, and how to provide accommodations and modifications. Ensuring staff have adequate training to support students in general education settings prevents inappropriate identification of students for special education and facilitates students having access to their LRE.

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 that district staff serving as administrative designees do not receive annual training on their role and responsibilities, on which students are eligible for special education services, or on the IDEA's procedural and substantive requirements. 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 regular training. Staff reported that special education instructional assistants participate in mandated training and receive additional training during nonstudent workdays. 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.

In addition, the best practice is for special education instructional assistants to receive nonviolent crisis intervention training. In past years, the district has provided this training for certain special education instructional assistants depending on their placement. In 2024-25 the district had six staff members become certified to provide nonviolent crisis intervention training, and the district reported it plans to provide this training for all of its special education instructional assistants. The district needs to ensure all its instructional assistants receive nonviolent crisis intervention training since lack of training may result in less effective support for students and may create liabilities for the district.

Recommendations

The district should:

1. Continue to provide districtwide professional learning for all instructional staff addressing inclusive practices.
2. Provide districtwide professional learning for all instructional staff that addresses UDL, differentiation strategies, providing accommodations and modifications, and Tier 1 instructional strategies.
3. Begin providing annual training for staff serving as administrative designee at IEP meetings.
4. Ensure its special education instructional assistants receive nonviolent crisis intervention training.

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 MOE document (20 USC 1413 (a)(2)(B)). The IDEA 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 (PCR) 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 expenditures to determine if any meet one of the exceptions that may allow the district to reduce the amount of state and local funds it spends on special education.

Building Comparable Data

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

The special education financial reporting methods used by districts, county offices of education and SELPAs can vary. For example, Montebello Unified excludes most of its special education transportation costs (except contracted services) but includes legal and settlement costs and early retirement incentive costs, while other districts exclude them. There are also differences in how special education funds are allocated by SELPAs. 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 $1,424,207 in 2021-22, and $2,265,180 in 2022-23. 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 2023-24.
- FCMAT used only special education expenses in the comparison. During the review period, the district charged some non-special education 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 $1,342,853 in mental health expenditures in 2023-24, which were reported to not have been used for special education (and not in the MOE) from its calculation. At the time of fieldwork, all the 2024-25 and 2025-26 mental health funding was budgeted to support students in special education and were included.
- The impact of some special education service expenditure transfers coded to non-special education SACS resource codes were reclassified by the district and excluded from the special education MOE. Staff reported this occurred because these expenses had non-special education revenue streams. The district reclassified $3,107,439 in 2023-24 and $861,944 in 2024-25 in services to the unrestricted general fund and other restricted local funds to Medi-Cal prior to the estimated actuals reporting period. Due to the uncertainty of Medi-Cal income, and the need to identify all special education program expenses for comparison purposes, FCMAT treated these expenses as if they were a contribution and added them in 2023-24 and 2024-25. Since the 2025-26 services budget closely mirrors the 2024-25 estimated actuals, these expenditures were also added to the 2025-26 budget.
- The district did not include in its MOE the impact of special education expenses charged to one-time non-special education SACS resource codes. Because these expenses were made from non-special education one-time revenue sources, they did not require a district contribution. These one-time revenues caused large one-time reductions in the unrestricted general fund contribution to special education and included the following:

 - The unrestricted general fund.
 - Expanded Learning Opportunities Grant: ESSER III State Reserve, Learning Loss.
 - Extended Learning Opportunities Grant.
 - Extended Learning Opportunities Program.
 - Expanded Learning Opportunities Grant: Paraprofessional Staff.
 - 21st Century Community Learning Centers: ESSER III Summer Learning Program.
 - Classified School Employee Summer Assistance Program.

- FCMAT added the following amounts back for comparison purposes: $1,878,183 in 2021-22, $777,034 in 2022-23, and $847,398 in 2023-24. The impact of one-time funding on the unrestricted general fund contribution increased to approximately $2,550,596 in the 2024-25 estimated actuals and subsequently reduced to $939,315 in the 2025-26 budget as these funds were exhausted.
- Although the district charges few indirect costs, full indirect costs have been charged to all special education programs using the CDE's approved rates for all the comparison years. The best practice is to charge the full indirect rate to all programs, including those 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 certain transportation service expenses as special education expenditures for MOE purposes. The impact of special education transportation expenses on the MOE in the 2025-26 budget is reported to be just $830,000, all attributable to service expenditures. A review of mileage indicates that approximately 35% of the nonservice expenditures are also attributable to special education, excluding program transfers. Because the district does not trend other special education expenses, these expenses are reported separately in Table 28 below. Since districts report transportation differently in SACS, FCMAT did not adjust the general fund contribution.

In addition, transportation income is not reported since the California School Accounting Manual (CSAM) has not developed a method to match the income with the expense. This causes approximately $1.9 million in special education transportation income for 2025-26 to not be credited to a special education resource or goal code. However, this does not prevent the district from maximizing its reimbursement for special education transportation expenses.

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 and 2022-23 income was excluded), and adding estimated expenditure transfers for 2023-24 through 2025-26 applied to fiscal years 2021-22 to 2025-26, as shown in Table 28 below. Data from 2021-22 was used as the base for calculating the percent change in the "Historical 2022-23" column.

Table 28. Comparison of Adjusted Special Education Expenses Using Ongoing Income Only, 2022-23 to 2025-26

Category	Historical 2022-23	Historical 2023-24	Historical 2024-25	Projected 2025-26	Average Historical Annual Rate
Increase in Special Education Students	0%	1.8%	13.1%	N/A	5.0%
Decrease in Ongoing Income	-6.8%	-3.6%	-8.0%	0%	-5.2%
Increase in Certificated Salaries	10.2%	6.7%	1.6%	1.0%	8.5%
Increase/Decrease in Classified Salaries (Non-Transportation)	10.0%	-7.3%	3.6%	5.3%	1.3%
Increase/Decrease in Classified Salaries (Transportation)	38.1%	8.8%	-2.0%	11.3%	23.5%
Increase/Decrease in Benefits	11.8%	6.4%	2.2%	-1.6%	9.1%
Increase/Decrease in Books and Supplies (Non-Transportation)	-19.4%	11.1%	-11.0%	-1.3%	-4.2%
Increase/Decrease in Supplies (Transportation)	34.2%	-8.8%	1.7%	-10.9%	12.7%
Increase/Decrease in Services (Excluding Transportation)	30.2%	-0.4%	22.1%	-0.5%	14.9%
Increase/Decrease in Transportation Services	17.8%	7.4%	6.8%	-1.0%	12.6%
Transportation Capital Expenses	N/A	N/A	N/A	100%	N/A
Increase/Decrease in Other Tuition	9.9%	-11.4%	7.1%	-4.8%	0.8%
Increase/Decrease in Adjusted General Fund Contribution	19.0%	9.4%	12.3%	-0.3%	N/A
Adjusted Dollar Amount of General Fund Contribution	$58,514,187	$63,990,302	$71,880,645	$71,674,407	N/A
Adjusted Dollar Amount of Special Education Expenses	$83,374,413	$87,948,595	$93,916,949	$93,710,460	N/A

Sources: Official SACS unaudited actuals and estimated actuals, 2025-26 budget, and Enrollment by Subgroup for Charter and Non-Charter Schools - Montebello Unified (CA Dept of Education).

Notes: Official SACS data were reduced by one-time income in 2021-22 and 2022-23, and full indirect costs were added. Special education expenses, as reported by the district, which were reclassified to non-special education goal codes were included in 2023-24, 2024-25 and 2025-26. Ongoing costs charged to non-special education resources are included in the total cost of the program but do not have a fiscal impact on the district contribution.

The "Adjusted Dollar Amount of Special Education Expenses" category was adjusted to match footnoted entries in the district's budget.

Transportation-related capital expenses were reported only in 2025-26 for an electric vehicle charging station.

Special Education Funding and Expenses

The average decrease in ongoing special education funding over the review period was 5.2% per year. In 2024-25, the district is projecting an additional 8.0% decrease in special education income, with no subsequent decrease in 2025-26. Decreases in special education income between 2021-22 and 2024-25 are primarily due to a decrease in funded ADA of 10.8% as defined in Education Code 56836.144(b), and Downey Unified receiving a larger share of the SELPA's federal funding in 2024-25 than in past years according to SELPA documents.

During the review period, the number of students identified for special education increased by 5.0% per year, but expenses increased at an approximate rate of 8.0% per year.

Staffing Costs

From 2021-22 to 2024-25 special education certificated staff salaries increased by 19.4% due primarily to negotiated salary increases and step and column expenses. Special education classified employee salaries, excluding transportation-related staff, increased by 5.4% during that same period. The reduction in classified employee salaries, excluding transportation-related staff, in 2023-24 was reported to be due to reductions in direct services to students. Conversely, transportation increased staffing over the review period, and transportation-related classified employee salaries increased by 47.2%.

The district is projecting an additional 1% increase in certificated staffing and 10.6% in transportation-related classified employee staffing, which appears liberal, plus a 5.3% increase in classified staffing, excluding transportation-related staff, in the 2025-26 budget.

Cost of Nonpublic School Services

According to DataQuest the number of district students attending an NPS increased by 14 students between 2021-22 and 2022-23. Between 2022-23 and 2024-25, the number of students attending an NPS decreased by five students, or 10%, as shown in Table 29 below.

Table 29. DataQuest Reported NPS Enrollment, 2021-22 through 2024-25

	2021-22	2022-23	2023-24	2024-25
Number of Students	37	51	47	46

Sources: Enrollment by Age Range with School Data - Montebello Unified (CDE).

Note: District-provided data differs from NPS enrollment data in DataQuest, likely due to the timing of reporting (census day versus year-end student numbers).

The district has been diligent in submitting claims to the state's extraordinary cost pool program, which reimburses SELPAs for the extraordinary costs associated with a single placement in an NPS. Of district students attending an NPS over the last three years, an average of 35% of these students have qualified for extraordinary cost pool reimbursement, which is an exceptionally high percent. In 2023-24, the district submitted extraordinary cost pool reimbursements for 17 of its 47 students attending an NPS, and in June 2025 the district was reimbursed for 48.96% of the eligible student costs in excess of $97,944.15. However, based on FCMAT's review of the number of district students attending an NPS and the captured costs, it appears that not all NPS-related costs are being captured in SACS. The district needs to determine how to better evaluate NPS enrollment and costs to ensure it has captured all expenses in SACS so that all students are reported and expenses are reviewed based on the services provided.

The district budgeted a 16.6% increase in NPS expenses for 2024-25, but no increase was budgeted for 2025-26. Unless several of the students attending an NPS in 2024-25 graduated or there is a large decrease in contracted service providers, it appears that the cost of nonpublic agency (NPA) and NPS services has been underbudgeted in 2025-26. Additionally, the district is not capturing its NPS transportation expenses for reimbursement because it does not code these expenditures to function code 3600 as described in the "District Transportation Funding" section of this report.

Transportation Costs

Transportation supply costs, primarily fuel and tires, are increasing at higher average rates than other special education expenses. In 2025-26, the district budgeted a 10.9% reduction in supply costs, which may reflect a higher reliance on electric vehicles. Transportation service costs are more linear and mirror other service trends in special education, despite higher salaries and benefits service costs, which generally reduce the need for contracted services. All the district's special education capital expenditures budgeted in 2025-26 were related to transportation, which were reported to be for an electronic vehicle charging station. The cumulative 2025-26 transportation budget appears too low as it relates to service costs decreasing.

District Unrestricted General Fund Contribution

The district's adjusted unrestricted general fund contributions, including expenditures for full indirect costs, and increases or reductions for one-time income, reclassified expenses, and special education income that was used to support non-special education students, are shown in Table 30 below.

Table 30. District's Adjusted Unrestricted General Fund Contributions to Special Education, 2021-22 through 2024-25

Category	2021-22	2022-23	2023-24	2024-25
Adjusted Unrestricted General Fund Contribution	$49,170,085	$58,514,187	$63,990,302	$71,880,645
Percentage of Adjusted Special Education Costs	64.8%	70.2%	72.3%	76.5%

Sources: Official SACS unaudited actuals, estimated actuals, and 2025-26 budget data.

Notes: Official SACS data were adjusted to add full indirect costs and reduce by one-time income in 2021-22 and 2022-23. In addition, special education expenses which the district had reclassified to non-special education goal codes were included in 2023-24, 2024-25 and 2025-26. These expenses as well as ongoing costs charged to non-special education resources are included in the total cost of the program but have no fiscal impact on the district's contribution.

In 2024-25, the district's estimated unrestricted general fund contribution (using full indirect costs, adjusted expenditures and reduced by one-time income) is estimated to be 76.5% of adjusted special education costs. The fluctuations in expenses observed in 2020-21 and 2021-22 were associated with declines in expenses during periods when students were generally not in attendance because of the COVID-19 pandemic and the district incurring higher service costs. Since 2021-22, the district has incurred significant employee collective bargaining settlement costs, increased costs related to NPS placements and increased NPA service costs.

In 2025-26, the district's adjusted unrestricted general fund contribution as a percentage of total special education costs as reported in the budget is projected to remain flat at 76.5%.

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 seven Office of Administrative Hearings (OAH) hearings scheduled for cases filed in June, July and August of 2025. 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 if a case warrants that. In addition, staff interviewed reported that additional training of special education teachers, related service providers and administrators is needed, which is described in the "Professional Learning Plan" section of this report.

The district's special education related legal fees and settlement costs, excluding compensatory service costs, have been relatively consistent over the last three years and are generally low as shown in Table 31 below. The district does not separate its accounting for compensatory education NPA service costs granted due to a settlement from the total settlement costs, but it should so that these costs may be tracked and known.

Table 31. District's Special Education Related Legal Fees and Settlement Costs (Excluding Compensatory Service Costs), 2021-22 through 2023-24

Category	2021-22	2022-23	2023-24
Legal Fees	$146,650	$168,526	$111,890

Source: District-reported data.

The best practice is for the Business Services and Special Education departments to regularly monitor budgets for special education related legal fees and settlement costs. Although the district establishes these budgets, staff reported that the Special Education Department has no access to the detailed budgets. The district should begin providing a detailed budget to the Special Education Department so it can better monitor these expenditures.

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. Disaggregate, monitor and track transportation, NPA and NPS costs, and annually analyze trend data to use for budgeting.
4. Record transportation provided by special education instructional assistants, and NPS and NPS/Licensed Children's Institution (LCI) transportation expenses to SACS function code 3600 to generate transportation income.
5. Conservatively budget for increases in transportation, NPA and NPS, and service expenditures, and compare year-to-date actual to budgeted expenditures at interim reporting periods.
6. 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, demographics underwent changes, and the demand for special education transportation surged dramatically. The subsequent 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 base grant. 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 2022-23, 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 Function 3600), 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 district developed and adopted its initial Transportation Services Plan as required so it may receive school transportation funding equal to 60% of the prior year's student transportation expenditures reported in Function 3600. However, according to district-provided documents, its Transportation Services Plan for 2024-25 was approved on April 2, 2025, which is one year and one day beyond the date by which the plan needed to be approved (April 1, 2024). FCMAT was not provided with a Transportation Services Plan for the 2025-26 school year. The district needs to ensure all annual or multiyear transportation services plans are board-approved prior to April 1 for the following school year. In addition, the district needs to immediately take its Transportation Services Plan for the 2025-26 school year to the governing board for approval even though the plan will be approved after the required date for the 2025-26 school year, which was April 1, 2025.

District Transportation Funding

Since the inception of the LCFF, the district has received $1,700,568 for school transportation. Its 2023-24 unaudited actuals financial report indicates that the district spent $9,055,678 for school transportation. The district did not report any capital expenses in 2023-24, which would have reduced its eligible transportation related expenses for reimbursement. Sixty percent of the district's eligible school transportation expenditures in 2023-24 was $5,433,407. Consequently, the district received an additional $3,732,838 in school transportation funding in 2024-25 due to the Budget Act of 2022. The district reported $9,326,308 in student transportation expenditures under Function 3600 in 2024-25, 60% of which may be eligible for reimbursement.

District Transportation Costs

Total Transportation Program Cost

The district's 2025-26 adopted budget projects $9,326,308 in total transportation program expenditures. Total transportation program expenditures include the general education home-to-school transportation program and the special education home-to-school transportation program for students who receive transportation as a related service in their IEP. The district does not separate the costs of its general education and special education home-to-school transportation programs or track its special education transportation expenditures under Function 3600 in SACS. In addition, the district does not track the cost of transportation activities such as cocurricular and extracurricular trips or consistently separate its maintenance expenses for maintenance and operations vehicles from its student transportation costs so it can charge departments for their share of the costs.

FCMAT analyzed the district's total 2024-25 transportation program mileage, which was 606,435 miles, and determined the costs per program could be separated based on mileage as follows:

- **35%** – Special education home-to-school transportation program.
- **55%** – General education home-to-school transportation program.
- **10%** – Cocurricular and extracurricular trips.

While these percentages can be used to distribute total transportation program costs across these three programs, tracking the mileage for each program would allow the district to more accurately assign program costs. The district needs to begin recording transportation expenditures separately for its general education and special education home-to-school transportation programs so the cost of each program can be known. In addition, all special education transportation expenditures must be properly reported under Function 3600 in SACS so the district can maximize its reimbursement following the Budget Act of 2022.

Transportation Cost Per Bus

The district's 2024-25 estimated actuals show it spent $211,961 to operate each district bus. Compared to what is observed across the state, this average per-bus cost is high. However, most districts separate expenditures for their general and special education transportation programs. Since the district does not separate these expenses, the comparison is not valid. FCMAT was unable to compute a per-student transportation cost because general education and special education transportation costs are not separated.

Recommendations

The district should:

1. Ensure its annual or multiyear transportation services plans are annually board approved prior to April 1 for the following school year.
2. Immediately take its Transportation Services Plan for 2025-26 to the board for approval even though it is beyond the required approval date (April 1, 2025).

3. Begin tracking fleet and labor expenditures for the special education and general education programs separately so the true cost of each program can be known.

4. Report all special education related transportation expenditures in Function 3600.

Special Education Transportation Program

In 2024-25, the district had 325 students who received transportation as a related service in their IEP. The district's Transportation Department transported 264 of these students on 24 school buses to district-operated schools and programs. This equates to an average special education ridership ratio of 11 students per school bus, which is within the statewide average of 10-15 students per special education bus route.

The district augments its internal student transportation program by using two contracted external transportation providers, Jorge's Get Around Transportation and HopSkipDrive. In 2024-25, Jorge's Get Around Transportation transported 35 students and 26 students received transportation from the nonpublic school as part of their nonpublic school placement. In addition, the staff reported the district reimburses approximately 10 parents/guardians under its board-approved in-lieu transportation policy. The district does not operate any district-owned vans or other alternative passenger vehicles.

Table 32 below shows the number and percentage of district students transported by each of the district's transportation providers in 2024-25.

Table 32. Number and Percentage of District Students Transported by Transportation Provider, 2024-25

Transportation Provider	Number of Students	% of Students Transported by Provider
Internal District Transportation Program	264	81.20%
Jorge's Get Around Transportation	35	10.77%
HopSkipDrive	0	0.00%
Rossier Park	4	1.20%
Sierra School of Alhambra	3	0.92%
Speech and Language Development Center	6	1.85%
Westmoreland	2	0.62%
Bridgeport West	1	0.31%
Summit View	1	0.31%
Beacon Day School	6	1.85%
Beach Cities	3	0.92%
Total	325	**100%**

Source: District-provided data.

District Transportation Model

The district's Transportation Department coordinates transportation for special education students who attend a school within the district's boundaries, which is 81.20% of transported students in special education. The Special Education Department coordinates transportation for the other 18.80% of students in special education who are placed in programs outside district boundaries using external contractors, nonpublic school provided transportation, or by reimbursing a parent who transports their own student.

Cost of Contracted External Transportation Services

In 2023-24 and 2024-25, the district spent $1,399,392 to transport 61 students through Jorge's Get Around Transportation, which is approximately $23,000 per student. This per student cost is much higher than typical district-operated bus services. While student needs, program locations, or a need to shorten ride times may necessitate an alternative transportation service like this one, they are generally the costliest mode of student transportation.

One of the district's contracted external transportation providers operates as a transportation network company (TNC), subcontracting drivers who transport one to four students in small passenger vehicles. TNCs often are used when it would be inefficient to assign a school bus for a small number of students. The district's other contracted external provider also uses nonbus passenger vehicles, but did not transport students in 2024-25.

The district's transportation model in which the Transportation Department coordinates in-district special education transportation and the Special Education Department coordinates out-of-district transportation is inefficient and costly. By integrating transportation staff into all decision-making, maintaining accurate cost data, and evaluating thresholds for when to transition students from external transportation contractors to district-operated services, the district can reduce costs while ensuring that student needs continue to be met.

Recommendations

The district should:

1. Begin having the Transportation Department evaluate and assign transportation services for all special education students instead of having the Special Education Department coordinate transportation services for students in out-of-district programs.
2. Evaluate whether it can use district-operated buses or vans instead of contracted external transportation providers for transport to out-of-district programs when three or more students are attending a program at the same location.
3. 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 assist in decision making.

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 contrast, district data show 8.4% of its students with IEPs receive transportation while 15.5% of student IEPs identify transportation as a related service, which indicates a gap between identified student needs and service delivery. The percentage of students receiving transportation is below the expected statewide range, while the percentage of IEPs identifying transportation as a related service is slightly above the norm. This may indicate a broad interpretation of transportation eligibility that is not fully aligned with IDEA guidance, or inconsistent application of existing eligibility criteria by IEP teams. Strengthening and standardizing the use of a transportation decision tree would help resolve these inconsistencies and ensure equitable, compliant service delivery.

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:

- The program recommended for the student is not available at their home school.
- The student's disability, typically an extensive support need, prevents the student from being able to navigate their surroundings, which is determined through an adaptive assessment.
- The student requires specialized academic instruction and uses a wheelchair or has a physical disability that significantly impacts their mobility.

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. The district needs to develop a detailed transportation decision tree to ensure consistency and alignment with IDEA requirements. 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 Department Staffing

Transportation Program Leadership

The district's Business Services Department provides administrative support to the transportation program, and a contracted consultant serves as the interim director of transportation. As previously mentioned, the interim director oversees internal transportation operations but does not manage the contracted external transportation providers. Given the transportation program's size, maintaining a dedicated Transportation Department is both reasonable and consistent with organizational models observed across the state. However, reliance on contracted interim leadership has created inconsistency. The district would benefit from establishing a permanent director of transportation position to provide stable leadership, develop long-term strategies, and gain a deeper understanding of the district's culture and operational needs.

Transportation Department Staffing

In 2024-25, the district's Transportation Department has the positions listed in Table 33 below.

Table 33. Transportation Department Positions in 2024-25 and Recommended Staffing Changes

Position	Current FTE	Recommended Change in FTE
Transportation Director (Consultant)	1.0	
Bus Operations Supervisor	2.0	
Executive Assistant	1.0	
Senior Office Assistant	1.0	
Driver Trainer Coordinator	1.0	Add a 1.0 FTE position.
Transportation Router	0.0	Create a new position and hire a 1.0 FTE.
Maintenance Supervisor	1.0	
Mechanic	6.0	
Equipment Mechanic	5.0	
Dispatcher	1.0	
Bus Driver and Coverage Bus Driver	57.0	
Total	76.0	Add two new positions (2.0 FTE).

Source: District-reported data.

Notes: The following positions were vacant at the time of FCMAT's study: 1.0 FTE bus operations supervisor position; 1.0 FTE bus operations supervisor position (long-term leave); and 3.0 FTE mechanic positions.

All bus drivers have 11-month contracts and work 8 hours per day.

Dispatcher Staffing

In reviewing staffing, FCMAT noted high overtime expenditures across multiple positions. Specifically, only one dispatcher coordinates daily operations from early morning through late afternoon. Programs of this size typically require at least two dispatchers to ensure full-day coverage, including evening activity trips. Adding a transportation router position to provide technical routing expertise while augmenting dispatch coverage would address this gap.

Vehicle Maintenance Staffing

The number of staff supporting the district's vehicle maintenance program is consistent with what is observed across the state. However, since 50% of the mechanic positions are vacant, the workload is unsustainable. This shortage places significant pressure on the maintenance program and risks compromising vehicle reliability and compliance. The district needs to prioritize recruitment of experienced journeyman-level mechanics, particularly those with expertise in maintaining medium- and heavy-duty fleet vehicles, as well as experience specific to school buses in accordance with Title 13 requirements.

Supervisory Capacity and Driver Training

The district has no active bus operations supervisors due to one vacancy and one supervisor being on extended leave. These positions are critical to provide daily supervisory coverage for a large staff of bus drivers and support personnel. The driver trainer coordinator has been temporarily assigned these supervisory duties; however, this compromises the district's compliance and training program. The driver trainer coordinator is the only state-certified instructor responsible for:

- Providing a minimum of 10 hours of annual in-service training for each bus driver.
- Conducting initial driver certification training and renewal.
- Managing the district's federally required drug and alcohol testing program.

According to CDE guidance, the district's bus driver staff size warrants at least two dedicated state-certified instructors. The district needs to consider adding a 1.0 FTE driver trainer coordinator to ensure training and compliance responsibilities are adequately supported.

Bus Driver Absenteeism

The district's Transportation Department faces persistent daily absenteeism of bus drivers, averaging 7–10 drivers absent each day. This level of absenteeism disrupts route coverage and directly affects student access to reliable transportation.

To address this issue, the district recently implemented the Transportation Absence Reporting System (TARS), which allows employees to electronically report absences. While the system tracks absences, it lacks required minimum call-out times. Staff reported that absences are often submitted immediately before shifts, limiting the department's ability to make timely adjustments. While FCMAT did not conduct a full audit of TARS data, staff reported potential misuse; for example, that employees have reported absences to avoid activity trip assignments or a specific route assignment. Therefore, the district needs to do the following:

- Review TARS data to assess absence patterns and identify any potential system misuse.
- Establish formal standards for TARS use, including minimum notice requirements for reporting absences.

Bus driver absenteeism forces support staff and licensed nondriver personnel to cover routes, which causes excessive overtime costs. The district employs 57 bus drivers, 13 of which are coverage drivers, to operate 44 daily routes. While industry standards suggest four to five coverage drivers are sufficient for a program of this size, the higher number appears necessary to compensate for chronic absenteeism. The district needs to review and strengthen policies and procedures related to employee attendance and absenteeism with a goal of reducing absenteeism and ensuring reliable transportation services for students.

Recommendations

The district should:

1. Establish and fill a director of transportation position instead of contracting for interim directors.

2. Prioritize filling existing vacancies in its bus operation supervisor and mechanic positions to restore operational capacity. Develop targeted recruitment strategies, such as compensation studies and specialized outreach, to address its 50% mechanic vacancy rate.
3. Create a transportation router position to manage routing software and support dispatch.
4. Conduct a comprehensive review of TARS absence data to detect and address potential misuse.
5. Implement minimum call-out time requirements for reporting absences through TARS to allow adequate coverage planning.
6. Review its policies and procedures related to chronic staff absenteeism and begin addressing this problem.

Vehicle Maintenance, Fleet and Facilities

Safety Compliance Report/Terminal Record Update

California regulations require all school buses to receive a full inspection from the California Highway Patrol (CHP) Motor Carrier Safety Unit. The unit also inspects all vehicle maintenance records, driver on-duty records, driver timekeeping records, and federal drug and alcohol testing records. The unit produces a report of its findings entitled the "Safety Compliance Report/Terminal Record Updates," commonly referred to as the CHP terminal grade.

The district earned grades of "satisfactory" on its most recent CHP terminal grade inspections in February of 2024 and 2025. This designation is the highest grade awarded to any motor carrier and indicates that the carrier generally complies with the laws and regulations governing school bus safety. Conversely, a grade of "unsatisfactory" indicates a serious deficiency or deficiencies. In such cases, the CHP clearly advises that failure to correct the deficiencies may lead to severe consequences, including a recommendation to the Public Utilities Commission (PUC) to revoke the district's motor carrier operating authority, filing a complaint with the district attorney for potential prosecution, and seeking an injunction. Failing to correct these issues may result in criminal charges against the governing board and the superintendent. Given the district's satisfactory CHP terminal grades, it is operating a safe and compliant school transportation program.

Fleet Maintenance

A review of the district's school bus inventory revealed discrepancies, likely due to the integration of newly acquired buses through grant programs and the retirement of older buses as a grant requirement. Based on internal fleet maintenance records, the district maintains the following:

- 89 school buses of varying sizes.
- 76 district support vehicles.
- 12 sedans assigned to the district's internal police program.
- Grounds equipment, including mowers, edgers, tractors, utility trailers, and numerous motorized or battery-operated tools.

The district is pursuing an aggressive modernization strategy through electric vehicle (EV) grants. It operates eight EV school buses and is completing a large infrastructure project to install up to 38 additional level II and direct current fast charging stations. By fall of 2025, the district expects to receive 32 more EV buses, significantly accelerating the replacement of its oldest fossil-fuel buses and enhancing fleet sustainability.

Staff reported that it is common for several buses to be placed out of service (OOS) due to preventive maintenance, required 45-day/3,000-mile inspections, or general repairs. During FCMAT's visit, as described in the "Transportation Department Staffing" section of this report, the district was operating with just half of its vehicle maintenance positions filled. While the bus fleet exceeds the recommended 10% spare ratio, many vehicles are permanently OOS or awaiting repair, limiting the district's operational flexibility. Staff further noted challenges in meeting special education transportation needs due to the lack of properly sized or equipped spare buses.

School Bus Safety Inspections

School buses are required to be inspected every 45 days or 3,000 miles, whichever occurs first per Title 13 of the California Code of Regulations, Section 1232 (13 CCR 1232). In addition, this code requires that each motor carrier have a written preventive maintenance program for its vehicles.

The district uses a shared Google document to track inspections and preventive maintenance activities. FCMAT reviewed inspection records and confirmed that the district is performing inspections at the required intervals. However, it does not employ an industry-standard fleet maintenance software system capable of electronic tracking, work order generation, or inventory control. Without such a system, the district faces challenges in:

- Monitoring maintenance schedules efficiently.
- Generating cost reports for its special education fleet.
- Separating and tracking reimbursable special education transportation expenses.

The district needs to implement a fleet maintenance software system to improve tracking of fleet expenses, work orders, inventory, and inspection schedules. Such a system would also strengthen the district's ability to segregate special education transportation costs for reporting and reimbursement purposes.

Recommendations

The district should:

1. Update and reconcile its school bus and support fleet inventory records for accuracy.
2. Assess and implement a fleet maintenance software system to improve tracking of fleet expenses, work orders, inventory, and inspection schedules.

Driver Training and Safety

School Bus Driver Training

School bus driver training in California is highly regulated. Pursuant to EC 40080-40089, prospective school bus drivers are required to complete a minimum of 20 hours of classroom training and 20 hours of behind-the-wheel training, using a curriculum developed by the CDE's Office of School Transportation

(CDE's OST). Typically, classroom training takes approximately 35 hours to cover all the units, and behind-the-wheel training requires a similar amount of time. Furthermore, in accordance with EC 40084.5, school bus drivers must also complete at least 10 hours of annual in-service training.

A state-certified school bus driver instructor must conduct all annual classroom and behind-the-wheel training sessions. Additionally, behind-the-wheel training may also be administered by a designated behind-the-wheel instructor, another classification of instructor allowed by law and certified by the CDE's OST.

The district has one state-certified school bus driver instructor. This instructor has a wide scope of responsibilities, including backfilling the two vacant bus operations supervisor positions. As mentioned in the "Transportation Department Staffing" section of this report, the CDE recommends one state-certified school bus driver instructor for every 25 California driver's licensed (CDL) school bus drivers. Considering the district's staffing shortages, training needs, and legal obligations, the district needs to consider adding another state-certified school bus driver instructor. In addition, the district needs to evaluate the benefits of designating experienced, high-performing drivers as behind-the-wheel instructors, under the supervision of a state-certified school bus driver instructor. This would expand training capacity and improve operational efficiency.

Proficiency and Safety Programs

Title 13, Section 1229 of the California Code of Regulations mandates that every commercial driver must demonstrate proficiency for each type of vehicle before operating it on the road without supervision. The district has implemented a safety and training program to meet this requirement.

The district also maintains a Transportation Safety Plan as required by EC 39831.3. This plan outlines protocols for post-route bus checks to ensure no students are left unattended and must be regularly updated to reflect current practices. The plan must be available at each school site and accessible to CHP officers upon request.

Employer Pull Notice Program

All district internal transportation school bus 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.

Under Senate Bill (SB) 88 (Chapter 380, Statutes of 2023), effective July 1, 2024, the district must enroll any staff who transport students in district vehicles in its EPN program. This includes van drivers providing home-to-school transportation, and teachers and coaches providing other student transportation. The district's contracted external transportation providers must also comply with the California Department of Motor Vehicles' EPN program standards. The district needs to verify that the language in all contracts with external transportation providers is compliant with SB 88.

The district's state-certified school bus driver instructor, who was the interim bus operations supervisor at the time of FCMAT's visit, oversees EPN enrollment and ensures staff participate in federally required drug and alcohol testing. Staff reported that the district's third-party contractor provides random drug/alcohol testing lists to staff in advance of testing, which is a concerning practice. This practice poses risks because the state-certified school bus driver instructor, who is included in the random testing pool, is also responsible for administering the process. Although the state-certified school bus driver instructor reported that they notify the interim director of transportation when they are selected for testing, the timing could be manipulated, compromising program integrity.

The best practice is for a supervisory or leadership staff member in human resources or risk management who is not in the pool tested to serve as the district's point of contact (POC) with the third-party contractor conducting drug and alcohol testing. This ensures confidentiality and safeguards the integrity of the federally required testing program. Staff reported that a district risk management staff member intended to assume responsibility for being the POC with the third-party contractor for drug and alcohol testing, but staffing changes delayed implementation. The district needs to immediately designate a nontransportation leadership position as the official POC for random drug and alcohol testing. In addition, the district needs to ensure the following:

- Include all CDL staff in the Transportation Department in the testing pool.
- Ensure district staff who are not in the Transportation Department, such as Class C drivers transporting students in vans or alternative vehicles, are tested in a separate pool, preventing dilution of the CDL pool integrity.

Evacuation Drills and Student Safety

Education Code 39831.5 requires districts to conduct school bus emergency evacuation drills annually. Districts must also maintain specific records for students in TK through grade eight who ride school buses. Specific safety information must also be announced before every field trip. In 2024-25, the district completed all required evacuation drills.

Recommendations

The district should:

1. Immediately identify a supervisory or leadership staff member in human resources or risk management who is not in the pool tested to serve as the district's point of contact with the third-party contractor conducting drug and alcohol testing.
2. Implement a procedure to ensure that all contracted external transportation providers meet the requirements of SB 88.
3. Consider whether it would benefit from appointing one or more designated behind-the-wheel school bus driver instructors to be overseen by the state-certified school bus driver instructor.

Appendix

Appendix A: Study Agreement

FCMAT

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
FOR MANAGEMENT ASSISTANCE

This study agreement, hereinafter referred to as Agreement, is made and entered into by and between the Fiscal Crisis and Management Assistance Team, hereinafter referred to as the Team or FCMAT, and the Montebello 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. Analyze whether the district provides a continuum of special education and related services for students in preschool through age 22, including their placement in the least restrictive environments, and make recommendations for improvement (which may include instructional models), if any.

7. 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.

8. Review the costs of due process activities, mediations and settlements for the past three years and make recommendations for improvements, if any.

9. Review the district's professional development/training program as it relates to special education, and make recommendations for improvement, if any.

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. <u>PROJECT PERSONNEL</u>

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 $37,000.

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: Horacio Perez, Assistant Superintendent, Student Services

Telephone: (323) 877-7900

Email: perez_horacio@montebello.k12.ca.us

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:

27 MAR 2025

Mark Skvarna, Ph.D., Superintendent — Date
Montebello Unified School District

For FCMAT:

Michael H. Fine — Digitally signed by Michael H. Fine
Date: 2025.03.27 12:26:19 -07'00'

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