

# FCMAT

FISCAL CRISIS & MANAGEMENT  
ASSISTANCE TEAM

## Special Education Review

July 17, 2025



# Pajaro Valley Unified School District

Michael H. Fine  
Chief Executive Officer

July 17, 2025

Heather Contreras, Superintendent  
Pajaro Valley Unified School District  
294 Green Valley Road  
Watsonville, CA 95076

Dear Superintendent Contreras:

In November 2024, the Pajaro Valley 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, adaptive 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 within 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 processes, 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 Pajaro Valley Unified School District and extends its thanks to all the staff for their assistance during fieldwork.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael H. Fine". The signature is written in a cursive, flowing style.

Michael H. Fine  
Chief Executive Officer

# Table of Contents

About FCMAT .....	ii
Introduction.....	iv
Background .....	iv
Study and Report Guidelines .....	iv
Study Team .....	iv
Executive Summary .....	v
Findings and Recommendations.....	1
Background and Context – Transforming Education to Improve Outcomes for Students with Disabilities .....	1
Identification for Special Education.....	5
Increasing Percentage of District Students in Special Education .....	9
Continuum of Service Options .....	14
District Organization and Central Office Special Education Staffing.....	19
Special Education Teacher Staffing.....	22
Special Education Instructional Assistant Staffing .....	29
Related Service Provider Staffing and Caseloads.....	36
Professional Development Plan .....	44
Unrestricted General Fund Contribution to Special Education.....	46
School Transportation.....	54
Appendix .....	64

# 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, policy-makers, 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 Santa Cruz County, the Pajaro Valley Unified School District serves students in transitional kindergarten through grade 12 (TK-12). According to [DataQuest](#), 17,089 students in grades TK-12 were enrolled in 2024-25.

Pajaro Valley Unified has elected to operate as a single-district Special Education Local Plan Area (SELPA), which means it is responsible to ensure that a full range of special education programs and services are available to its students. In 2024-25, 15.61% of the district's students were identified as requiring special education.

In November 2024, 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 April 24 and 25, 2025, to conduct interviews with central office and school administrators, special education teachers, related service providers, special education instructional assistants, and other staff. Following fieldwork, FCMAT reviewed and analyzed data and documents. This report is the result of those activities.

FCMAT's reports focus on systems and processes that may need improvement. Those that may be functioning well are generally not commented on in FCMAT's reports. In writing its reports, FCMAT uses the Associated Press Stylebook and its own short internal style guide, which emphasize plain language, capitalize relatively few terms, and strive for conciseness, clarity and simplicity.

## Study Team

The study team was composed of the following members:

Carolynne Beno, Ed.D.  
FCMAT Chief Analyst

Colleen Patterson, MBA, CMA  
FCMAT Consultant

Leonel Martínez  
FCMAT Technical Writer

Tim Purvis  
FCMAT Consultant

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

# Executive Summary

## Identification for Special Education

According to [DataQuest](#), the district's census day enrollment and special education enrollment have both declined over the past five years. However, the percentage of the district's transitional kindergarten through 12 (TK-12) students enrolled in special education increased by 1.01 percentage points during that period. In 2024-25, 15.61% of the district's TK-12 students were identified as requiring special education, which was a higher percentage than in Santa Cruz County or the state. The district's identification of students for special education is influenced by its implementation of student study teams (SSTs) and its multitiered systems of support (MTSS), which is discussed further in the "[Increasing Percentage of District Students in Special Education](#)" section of this report.

English learners are underrepresented in the district's special education program. The district needs to monitor this data and ensure it identifies all qualifying students with disabilities for special education.

In 2024-25, 80% of students enrolled in special education qualify under a primary disability category of specific learning disability, speech and language impairment or autism. From 2019-20 through 2024-25, the number of district students who qualify for special education under the disability category of autism rose from 176 to 309, which is a 75.57% increase. Despite this increase, students qualifying for special education under the primary disability category of autism comprise just 10.99% of the district's special education enrollment (compared to 20.00% of statewide special education enrollment).

## Special Education Staffing

### Central Office

Pajaro Valley Unified has 2.48 full-time equivalent (FTE) more administrator/leadership positions and 0.68 FTE more administrative support positions supporting its special education program compared to the surveyed comparable school districts.

### Resource Specialist Program

Districtwide resource specialist program (RSP) staffing is 4.32 FTE more than what is required to meet the Education Code (EC) 56362(c) caseload standard. However, the students who receive support from a resource specialist are not neatly distributed into groups of 28 (the caseload maximum required 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 appears necessary to meet student needs.

In addition to RSP teachers, the district employs education specialists who provide specialized academic instruction (SAI) and serve students with mild-to-moderate support needs in non-special day class (SDC) settings. The industry standard for SAI-based programs supporting students in their least restrictive environment (LRE) is 20-24 students per special education teacher, and the district is staffed within this range.

## **Special Day Class Programs**

All of the district's special education caseload size maximums for its SDC programs are higher than the industry standards. The district needs to evaluate whether aligning its SDC caseload guidelines with industry standards would allow it to provide better service to its students.

The districtwide mild-to-moderate SDC teacher caseload average and counseling enriched SDC teacher caseload average are within the industry standard range.

The districtwide autism SDC teacher staffing is significantly below the industry standard range of 8-10 students per teacher. The district needs to evaluate whether increasing teacher staffing for its autism SDC program would allow it to provide better service to students.

The districtwide extensive support needs SDC teacher caseload average is within the industry standard range for all school levels except for middle school, which is staffed just below the industry standard range. The district needs to evaluate whether increasing SDC staffing for its middle school SDC program for students with extensive support needs would allow it to provide better service to students.

## **Preschool Program**

The districtwide preschool cross-categorical SDC teacher caseload average is within the industry standard range.

The districtwide preschool autism SDC teacher staffing is below industry standard staffing. This is in part because data was analyzed at the end of the school year, and the district's preschool numbers grow over the course of the school year as students turn 3 years old and become eligible for the program. Accordingly, the district needs to evaluate start and end-of-year preschool program numbers to see what trends it can identify and determine whether an additional preschool autism SDC teacher is needed. In addition, the district needs to evaluate whether increasing teacher staffing for its preschool autism SDC program would allow it to provide better service to students.

## **Special Education Instructional Assistants**

The district uses staffing guidelines to assign special education instructional assistants and behavior technicians to its SDCs, which is a positive practice. However, the district's adult-to-student ratios for SDCs for students with extensive support needs and autism exceed the industry standards, which may result in more adults providing support than necessary. This is costly and may limit students' opportunities to gain independence. The district should consider whether it can revise its adult-to-student staffing ratios to align with industry standards and continue to meet student needs.

FCMAT analyzed the district's 2024-25 instructional assistant and behavior technician staffing in its SDCs. If the district had allocated special education instructional assistants and behavior technicians to its SDCs using the industry standard adult-to-student ratios, it may have been able to reduce by 50 total instructional assistants and behavior technicians.

In 2024-25, the district has 65 staff assigned to provide 1-to-1 student support. Although there is no industry standard for comparison, this is high for a district of this size compared to what is observed across the state. Assigning more instructional assistant or behavior technician support than necessary is costly. In addition, although a parent/guardian or staff member's request for a student to have 1-to-1 support may be well meaning, it can hinder the student's education as explained in the "Causes and Consequences of High 1-to-1 Student Support Staffing" section of this report and according to the University of Colorado at

Denver's Paraprofessional Resources and Research Center. The district needs to consider the recommendations in the "Best Practices in 1-to-1 Student Support Assignment" section of this report to reduce its reliance on 1-to-1 student support.

## **Related Service Providers**

The district is staffed at the industry standard for teachers of students who are visually impaired and school psychologists and is staffed almost exactly at the Education Code maximum caseload for speech and language pathologists (SLPs).

The district is staffed above the industry standard for adapted physical education (APE) teachers, credentialed school nurses, occupational therapists, and physical therapists. It needs to review caseload projections, the assessment load, the number of schools supported, travel time between schools, direct and consultation service minutes and students' needs to determine if staffing for these providers can be reduced while still meeting student needs.

The district is staffed at less than the industry standard staffing level for teachers for students who are deaf or hard of hearing. It needs to review caseload projections, the assessment load, the number of schools served, driving time between schools, direct and consultation service minutes, and students' needs to determine whether it needs to increase staffing for teachers of students who are deaf or hard of hearing.

## **Professional Development**

The district needs to prioritize professional learning for its instructional staff that is aligned with the Statewide Special Education Task Force publication, One System: Reforming Education to Serve All Students, Report of California's Statewide Task Force on Special Education, such as universal design for learning (UDL) and MTSS. The district needs to continue to provide districtwide professional learning for all instructional staff addressing inclusive practices and Tier 1 instructional strategies. The district also needs to begin providing districtwide professional learning for all instructional staff that addresses UDL, differentiation strategies, and providing accommodations and modifications. In addition, a plan needs to be developed to facilitate better access for instructional assistants to professional learning in areas such as disability awareness, positive behavior supports, implementing accommodations and modifications, and differentiation strategies.

## **Unrestricted General Fund Contribution to Special Education**

In 2023-24, the district's adjusted unrestricted general fund contribution to special education was \$46,572,078, or 68.48% of total special education costs. In 2024-25, the district's unrestricted general fund contribution as a percentage of total special education costs is projected to decrease to 68.35%.

## **Transportation**

The district provides general education home-to-school transportation and special education home-to-school transportation for students who receive transportation as a related service in their individualized education program (IEP). The district applies a percentage split to its total transportation budget to differentiate between general education and special education transportation expenses and makes a contribution from its unrestricted general fund to cover the special education transportation expenses. However, the

district does not effectively track and differentiate between expenditures for its general education home-to-school transportation program and its special education home-to-school transportation program when determining the percentage of costs charged to the two programs. Instead of applying a percentage split to the total transportation expenditures, the district needs to begin tracking fleet and labor expenditures for the special education and general education programs separately. This would enable the district to know the true costs of the two programs.

In 2024-25, the district reported it provides transportation for 494 students who receive special education transportation. The district has an internal Transportation Department that transports 431 of these students on 29 school buses, and external transportation providers transport the other 63 students. This equates to an average special education ridership ratio of 14.9 students per school bus, which is equivalent to the statewide average of 10-15 students per special education bus route.

The district augments its internal student transportation program by using contracted external transportation providers. In 2023-24, it spent approximately \$71,996 per month for these providers. The district's expense for contracted external transportation providers is high, and two of the four contractors the district is using in 2024-25 are transportation network companies (TNCs) who transport one to four students per alternative passenger transportation vehicle. While sometimes necessary to support individual student needs, TNCs are typically a much more expensive transportation option and need to be used sparingly.

The dispatcher responsible for special education transportation routing coordinates student transportation using district buses, vans and contracted external transportation service providers. Certain students are preidentified for routing through a contracted external transportation service provider due to factors such as student behavioral or health needs, program location, or to shorten the student's ride time. Staff reported that they could use the district's internal transportation program more often if they had sufficient staffing and reduced bus driver absenteeism, which is discussed further in the "[Transportation Department Staffing](#)" section of this report. The district needs to perform a cost-benefit analysis to explore whether it can increase its use of internal district transportation service and reduce its use of contracted external transportation providers. It also needs to address its bus driver absenteeism problem, which is further described in the "[Bus Driver Absenteeism](#)" 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 than the norm. Our prevailing model has made it acceptable, and in some instances seem desirable, to isolate special education as a unique and separate system that parallels general education.

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

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

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

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

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

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

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

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

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

Guided by the insights from the 2015 report on one system and the 2021 WestEd report, 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 Services Department and its staffing throughout this report.

## **District Alignment with the 2015 Report on One System**

Congruent with the tenets in the 2015 report on one system, the Special Services Department’s vision statement is:

Students with disabilities are general education students first. We acknowledge that they need additional time and support in their learning. Through our collaborative efforts with general education staff, students are given access to high-quality curriculum, assessments, programs, and services to support their social-emotional and educational growth in the least restrictive environment.

Special Services Department staff and school principals interviewed described the district’s special education program as a support for students with disabilities, not a place where students with disabilities go to receive a separate education. Staff interviewed articulated a strong belief that students with disabilities are general education students who are best supported by all general education and special services person-

nel at each school. These core beliefs and values held by district educators provide a strong foundation for the inclusive, coherent system of education envisioned in the 2015 report on one system to support the success of students with disabilities.

Also congruent with the 2015 report on one system, the executive director of the Special Services Department, who oversees the SELPA director and special education program, participates in the superintendent's administrative cabinet meetings. This facilitates a direct line of communication and enables students with disabilities to be considered in district planning. In addition, staff reported that the Special Services Department staff meet approximately quarterly with the Business Services Department staff to monitor their budget and regularly with staff from the Human Resources and Business Services departments to monitor and update position control throughout the year. Staff reported this regular interdepartmental collaboration began occurring prior to the COVID-19 pandemic and has continued since. Staff explained that before that time, district departments worked in relative isolation.

Incongruent with the principles in the 2015 report on one system, many staff interviewed reported that at certain schools, the general education program is quick to make a referral for a special education assessment as soon as a student demonstrates a learning difference, instead of implementing accommodations and supports within the general education program. This is discussed further in the "Increasing Percentage of District Students in Special Education" section of this report. In addition, special education staff reported certain educators in the district refer to students with disabilities as "SELPA students" instead of as general education students who also receive specialized services.

To promote an understanding that students receiving special education services are general education students first, the district has a Supporting Innovative Practices grant and is working to promote an inclusive mindset and the implementation of inclusive practices districtwide. Furthermore, the district's vision, goals and core values, as shown in the district-created graphic below, are based on an inclusive philosophy and use inclusive language. For example, the core value equity states, "Assure that all students have equitable access to resources and supports to promote success and guarantee that 'All Means All'."



Source: District-created graphic.

The district needs to continue its work to promote an inclusive mindset among all educators and give staff the tools to implement inclusive practices to support all students, including students with disabilities. This is discussed in the “[Professional Development Plan](#)” section of this report.

## Recommendations

*The district should:*

1. Continue to ensure staff from the Special Services Department and other district departments meet regularly to promote positive outcomes for all students, including students with disabilities.
2. Continue its work to promote an inclusive mindset and the implementation of inclusive practices in 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

From 2019-20 through 2024-25, the district's census day enrollment for all TK-12 students declined by 2,683 students, as shown in Figure 1 below.

### Census Day Enrollment of District Students in Grades TK-12, 2019-20 — 2024-25

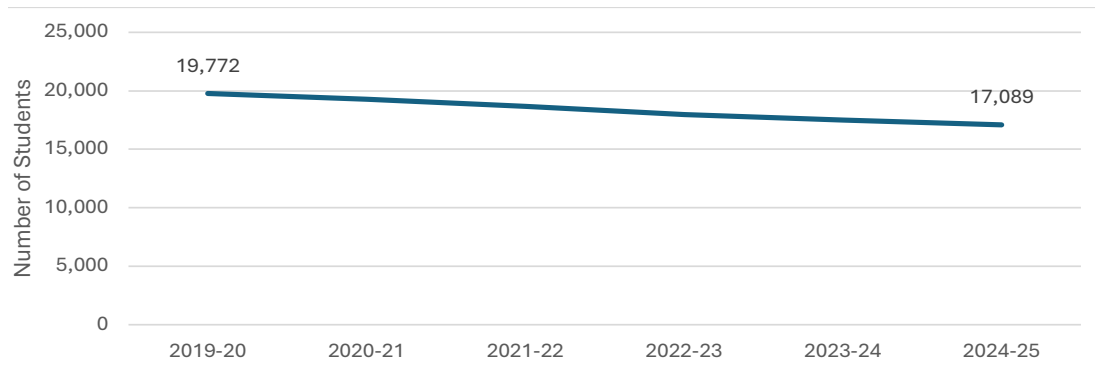


Figure 1. A graph showing an overall decline in district census day enrollment for TK through grade 12 from 19,772 in 2019-20 to 17,089 in 2024-25.

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

## District Special Education Enrollment in Grades TK-12, 2019-20 — 2024-25

Like total district enrollment, special education enrollment in TK-12 decreased by 87 students from 2019-20 through 2024-25, as shown in Figure 2 below.

### Number of District Students in Grades TK-12 Enrolled in Special Education, 2019-20 — 2024-25

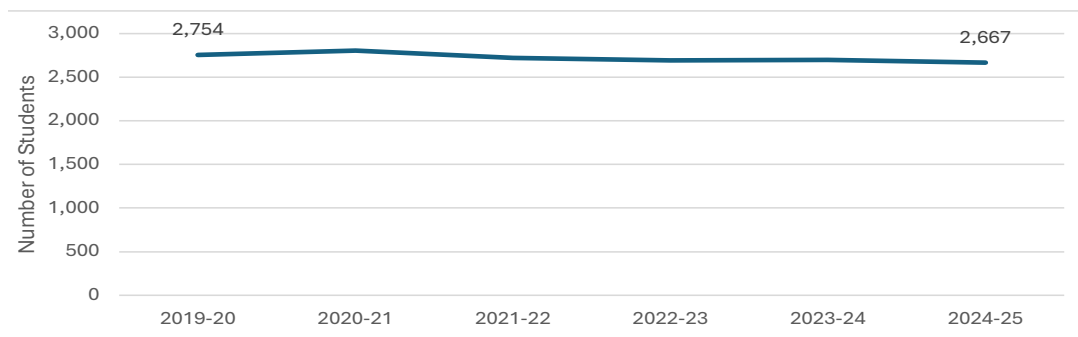


Figure 2. A graph showing an overall decrease in the number of district TK-12 students enrolled in special education, from 2,754 in 2019-20 to 2,667 in 2024-25.

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

District students who identify as male are much more likely to be identified for special education than those who identify as female. The former group make up 51% of all students but 67% of students in special education, which approximates the statewide average of 66% as calculated from DataQuest. The latter group make up 49% of all students but only 33% of students in special education. The higher representation of students who identify as male in special education is influenced by factors such as referral bias (e.g., students who identify as male are more likely to be referred because of poor grades or behavior support needs) and differences in how teachers perceive student behavior (e.g., students who identify as male often draw more negative attention in school). Consequently, it is important for LEAs to analyze special education referral rates by gender identification and provide professional development as needed to address any disparities.

## District Special Education Enrollment by Disability Category

The Individuals with Disabilities Education Act (IDEA) defines 14 categories of disability under which a student may be eligible for special education. In 2024-25, approximately 95% of the district's students enrolled in special education qualified under one of the six disability categories shown in Table 1 below.

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

	Autism	Emotional Disability	Intellectual Disability	Other Health Impairments	Specific Learning Disability	Speech and Language Impairment
2019-20	6.20%	2.82%	4.40%	8.20%	47.55%	24.64%
2024-25	10.99%	3.13%	4.30%	10.24%	39.80%	26.32%
Difference	4.79	0.31	-0.10	2.04	-7.75	1.68

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

Notes: Although there are 14 disability categories under which a student with a disability may qualify for special education, this table shows data only for the six most common in the district.

The disability category of "emotional disability" was previously "emotional disturbance," which is the term defined in the IDEA and used throughout the Education Code and the California Code of Regulations. However, Assembly Bill 2173, signed by the governor in July 2024, permits California to use the less offensive term "emotional disability" in state law.

According to DataQuest, in 2023-24 specific learning disabilities constituted the vast majority of identified disabilities statewide, followed by speech and language impairments and autism, respectively. In 2024-25, the district reported that a higher percentage of its students were eligible for special education due to a specific learning disability compared to the state average (39.80% versus 33.20%). Like statewide trends, speech and language impairment and autism were the next two most common disability categories in the district, making up 26.32% (compared to 21.2% statewide) and 10.99% (compared to 20.00% statewide) of special education enrollment, respectively. Significantly, from 2019-20 through 2024-25, according to the district's CALPADS reports, the number of students who qualify for special education under the disability category of autism rose from 176 to 309, which is a 75.57% increase. Despite this increase, the district's identification of students for special education under the category of autism is notably lower than 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 disproportionate identification of student groups, such as English learners, students who identify as males, and a racial or ethnic group, for special education.

### Racial and Ethnic Balance of Students

For all racial and ethnic groups in the district, their representation as a percentage of total students enrolled in special education was proportionate to their representation as a percentage of all district students, as shown in Table 2 below.

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

	African American	American Indian	Asian	Filipino	Hispanic or Latino	Not Reported	Pacific Islander	Two or More Races	White
Percentage of Total Enrollment	0.19%	0.12%	0.50%	0.54%	84.57%	0.00%	0.09%	1.43%	12.51%
Percentage of Special Education Enrollment	0.19%	0.00%	0.00%	0.38%	86.69%	0.00%	0.15%	1.24%	10.87%
<b>Difference</b>	<b>0.00</b>	<b>-0.12</b>	<b>-0.50</b>	<b>-0.16</b>	<b>+2.12</b>	<b>0.00</b>	<b>+0.06</b>	<b>-0.19</b>	<b>-1.64</b>

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

### English Learners in Special Education

English learners are commonly overidentified for special education services. However, this does not appear to be the case in this district since English learners are underrepresented in the special education population. In 2024-25, according to DataQuest English learners made up 36.89% of all district TK-12 students but 26.85% of students in special education.

It is imperative that the district identify all qualifying students with disabilities. Public schools are required under the IDEA to identify, locate, and evaluate all children who are suspected of having a disability. Failing to identify a student with a disability for special education can deprive the student of their right to a free appropriate public education (FAPE) under the IDEA. This can impede the student’s academic achievement and outcomes and may obligate the district to pay for compensatory educational services.

WestEd’s brief, Resources and Strategies for Identifying and Supporting English Learners with Learning Disabilities, identifies two main factors that can lead to inconsistent identification of English learner (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 reason for the district's lower-than-expected identification of English learners for special education is unclear. The district needs to use this WestEd brief as a guide to investigate its lower-than-expected identification of English learners in special education and provide professional development as necessary.

## District Special Education Enrollment Compared to Countywide and Statewide Enrollment

According to [DataQuest](#), from 2019-20 through 2024-25, the percentage of district TK-12 students enrolled in special education increased by 1.01 percentage point from 14.60% to 15.61%.

FCMAT compared district total and special education TK-12 enrollment to statewide enrollment for 2024-25. This data is shown in Table 3 below.

**Table 3: TK-12 Total and Special Education Enrollment Comparison, 2024-25**

2024-25	Pajaro Valley Unified	Santa Cruz County	California
Grades TK-12 Total Enrollment	17,089	37,287	5,806,221
Grades TK-12 Special Education Enrollment	2,667	5,450	827,105
<b>Percentage</b>	15.61%	14.62%	14.25%

Sources: [Enrollment for Charter and Non-Charter Schools - Pajaro Valley Unified \(CDE\)](#), [Enrollment for Charter and Non-Charter Schools - Santa Cruz 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 Santa Cruz County or 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 of students for special education than county and state averages is discussed in the "[Increasing Percentage of District Students in Special Education](#)" 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 students in the special education group compared to the overall student population at least by gender, race, ethnicity, and English learner status. Provide training in how to properly identify students for special education 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 lower-than-expected identification of English learners in special education and provide professional development as necessary.

# Increasing Percentage of District Students in Special Education

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 1.01% and is above state and county averages. Many staff interviewed identified student and parent exposure to pesticides and other environmental factors present in their farmworker community as a reason for the district’s percentage of students in special education being above state and county averages. The University of California Berkeley School of Public Health is conducting research investigating this phenomenon. FCMAT does not have a way of evaluating exposure to pesticides and other environmental factors as a possible cause of the district’s special education identification rate; however, this rate appears to be influenced by at least the factors discussed 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 student success team (SST). This school-based team approach is designed to help students with a wide range of concerns related to their school performance and experience. SSTs are responsible for reviewing students’ strengths and weaknesses, identifying appropriate interventions, setting specific, measurable, achievable, relevant, and time-based (SMART) goals, and monitoring students’ progress toward these goals. An SST is composed of the student (if appropriate), the parent or guardian, and various school personnel such as counselors, resource specialists, speech pathologists, school psychologists, classroom teachers, and administrators. All LEAs should have an SST process.

The district has an SST process, which identifies the following examples of general education interventions that may be implemented prior to a referral for a special education assessment:

- Consultation with specialists and/or other staff.
- Modification of the general program and/or accommodations for the student to facilitate access to core curriculum.
- Utilization of general program resources such as counselors, Tier 1 and 2 supports, Title I resource programs, tutorials, English language development programs, migrant programs, reading intervention programs, 504 accommodation plans and summer school.
- Parent/guardian conferences.
- Referral to appropriate community agencies.

However, staff reported that the district does not regularly monitor SST-related data or require consistent use of its SST process. Staff indicated that some schools have an SST process that effectively provides

intervention and support for students in the general education program. But the SST process at other schools was reported not to do this because of factors such as the following:

- A lack of schoolwide intervention and support opportunities.
- The SST process is 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.

In addition, staff reported that certain general education interventions and supports identified in the district's SST process and multitiered system of support (MTSS) may prevent inappropriate placement of a student in the special education program. However, these interventions and supports are not implemented districtwide. For example, the district does not have a districtwide structured English language development program. These programs typically include curriculum and instruction designed specifically for English language learners to develop their listening, speaking, reading, and writing skills in English. It is not clear why the district has not adopted a curriculum or expectations related to an English language development program, but by not doing so, the district may not be providing the most appropriate supports for students who are learning English. This could increase the identification of students for special education services. As discussed in the "English Learners in Special Education" section of this report, district data shows English learners are underrepresented in the special education program. However, this data needs to be monitored.

## 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<sup>2</sup>) and positive behavioral interventions and supports (PBIS).

## Response to Instruction and Intervention (RtI<sup>2</sup>)

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

A comprehensive districtwide RtI<sup>2</sup> system not only prevents the inappropriate identification of students for special education but also ensures the delivery of services within students' LREs. An RtI<sup>2</sup> 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**

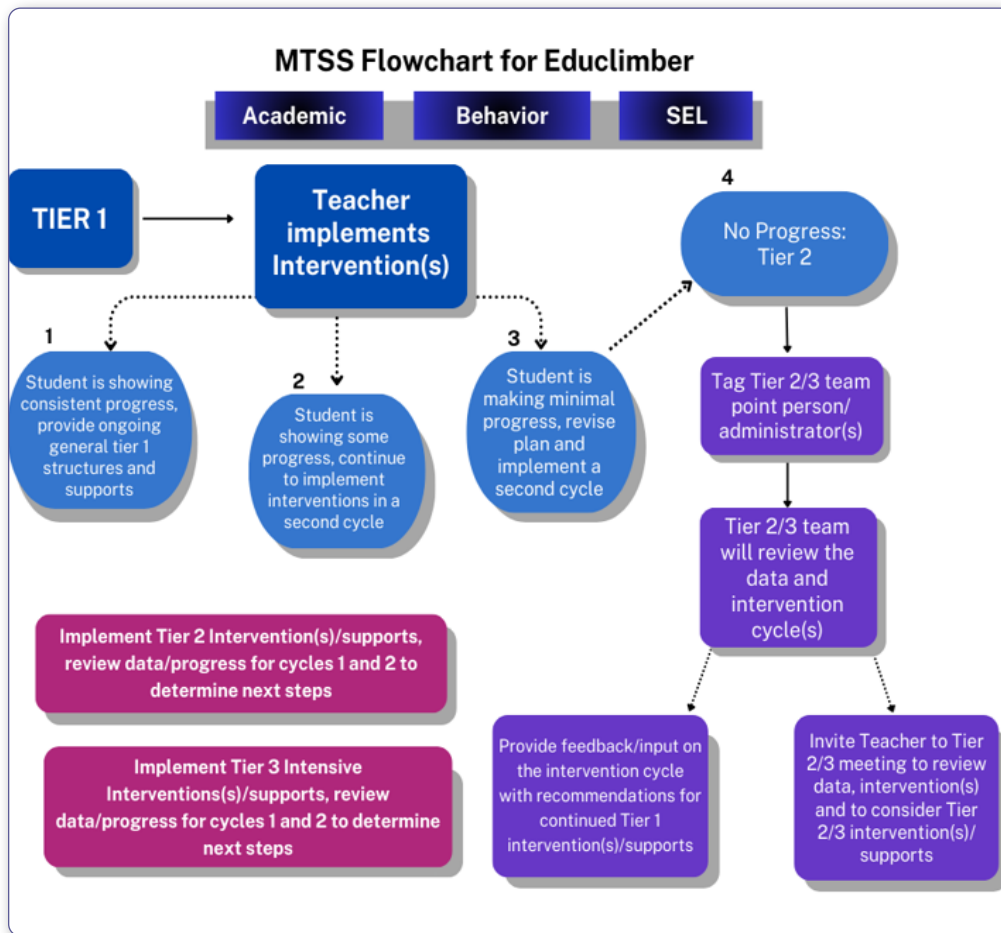
Positive behavioral interventions and supports concentrates on fostering the emotional and behavioral learning of students, which leads to an increase in engagement and a decrease in problematic behavior over time. PBIS helps districts adopt and structure evidence-based behavioral interventions.

## **District Implementation of MTSS**

The district has developed an MTSS framework, which identifies the following goals:

- Our goal for our students: the MTSS framework of support allows them to be known, respected and supported across the diversity of their learning needs, so they may achieve success in their academics, personal relationships, and eventual careers.
- Our goal for our educators: they see this MTSS framework as a way to support all students more effectively, more easily, and more efficiently. We aim to streamline the collection and documentation of observations and student data - as well as the planning and reporting process required for differentiation and intervention, so we can enable our teachers to spend more time building relationships with their students, delivering personalized support, and experiencing professional success.

The district has developed an MTSS flowchart that documents the steps in its MTSS, as shown below.



Source: District-created flowchart.

The district's MTSS is a three-tiered system of service delivery addressing academics, behavior, social-emotional learning and attendance. The district has an MTSS handbook that sets expectations for the Tier 1 instructional program, and how the district uses universal screenings, formative assessments, and progress monitoring to support student success. The MTSS handbook is comprehensive and includes relevant details in each of these areas, such as the timeline, instrument or assessment used and who is responsible for progress monitoring. It also describes how intervention and support is provided in each of the district's three tiers, which include:

- Tier 1 Enrichment and Support.
- Tier 2 Targeted Group Instruction.
- Tier 3 Intensive Individualized Intervention.

The district uses a Student Improvement Plan to document its data-driven process, which includes SMART (specific, measurable, achievable, relevant, and time-bound) goals, for addressing student concerns. As shown in the flowchart above, a Tier 1 plan is to be completed before moving on to the next tier of support. Students receive intervention and support in each tier, and staff track data on improvement cycles. If a student does not make sufficient progress after one improvement cycle, the Student Improvement Plan is revised, and a second improvement cycle is implemented prior to a student progressing to an intervention or support in the next tier.

Staff reported that the district's MTSS is new and works very well at certain schools but is not followed consistently at other schools. One problem identified by most staff interviewed is a lack of understanding and knowledge of how to implement Tier 1 supports and interventions. Staff explained that at certain schools, when a student demonstrates a learning difference, the teacher may not understand how to differentiate or design a lesson to accommodate and support the student's learning needs. Therefore, the student may immediately be referred to Tier 2 supports and/or interventions, or a special education assessment may be initiated for the student. 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. Professional learning suggestions related to MTSS are identified in the "[Professional Development Plan](#)" section of this report.

Staff reported that all district schools have received training in and are implementing PBIS consistently. Most of the district's schools applied for recognition of their PBIS programs, and PBIS is viewed by staff interviewed as supporting positive student behavior as designed. The district has also provided extensive training in restorative practices, which is viewed positively by staff interviewed.

## Recommendations

*The district should:*

1. Set an expectation that all schools use its SST process, and monitor, support, and require its consistent use.
2. Consider whether adopting a districtwide structured English language development program would help support students' English language development and the proper identification of students for special education services.
3. Provide additional training for all schools in MTSS with an emphasis of Tier 1 supports, and monitor, support and require its consistent use.

## 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 did not meet any of the 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**

Indicator	Indicator	Rate	Target	Target Met?
6a	Preschool LRE: Regular Program	7.22%	≥45.00%	No
6b	Preschool LRE: Separate Class	40.56%	<27.00%	No
6c	Preschool LRE: Home	3.89%	<3.50%	No

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

The district did not meet any of the targets for Indicator 6 in 2023-24, which means it needs to increase access for preschool age students to general education settings.

Staff reported the district is focused on increasing access for preschool age students to general education settings and it was awarded a Supporting Innovative Practices (SIP) grant to support this work. District staff visited an inclusive preschool in Marysville and in 2025-26 will begin reserving spots for students in special education in its State Preschool programs. The district should continue to prioritize this work as it will increase access for preschool age students to general education settings and establish a foundation for these students to participate in general education settings during their school-age years.

## School-age Least Restrictive Environment

In 2023-24, the district's local level annual performance report indicated it met one of the 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%	61.62%	≥64.00%	No
5b	LRE Rate: In Regular Class Less than 40%	20.02%	<15.00%	No
5c	LRE Rate: Separate Schools	1.22%	<2.80%	Yes

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

The district's 2022-23 Special Education Enrollment by Program Setting report in DataQuest indicates the district met one of the three targets for the placement of school-age students in the LRE, as shown in Table 6 below.

**Table 6: District's 2022-23 Performance on Indicator 5 — School-Age Students in the LRE According to DataQuest**

Indicator	Indicator	Rate	Target	Target Met?
5a	LRE Rate: In Regular Class More than 80%	59.90%	≥62.00%	No
5b	LRE Rate: In Regular Class Less than 40%	19.70%	<16.50%	No
5c	LRE Rate: Separate Schools	0.70%	<3.00%	Yes

Source: DataQuest 2022-23 Special Education Enrollment by Program Setting report.

The district's data from 2022-23 and 2023-24 is similar and indicates the district 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.

## 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 (E.C. § 56360). As a single-district SELPA, Pajaro Valley Unified meets this requirement by offering the following special education programs and services.

### Early Childhood Special Education Programs

School districts typically begin serving a student with a disability in preschool special education programs after a child's third birthday. However, because it is a single-district SELPA, the district provides special education assessment and services to students from birth to age 5. The district's program is based at Duncan Holbert School but provides support services to children at sites throughout the community including homes, hospitals, Head Start programs, private preschools, child-care facilities, play groups, and other natural environments. The district offers the following early childhood special education programs:

- **Early Start Program** - This is a statewide program that provides family-centered services and support to families of infants and toddlers from birth to 36 months of age who have developmental delays or disabilities. Individualized Family Service Plans (IFSPs) are developed to meet the needs of each child and family.

- **Stand-Alone Speech and Language Services** - At certain district schools, speech and language therapy is provided to eligible preschool-age children who do not have other special education needs.
- **Preschool Enrichment Program (PEP)** - Itinerant early childhood special education teachers monitor and support students in making progress toward their IEP goals in a general education setting.
- **Special Day Classes** - Early childhood special education teachers provide intensive instruction in a separate classroom with a low student-to-teacher ratio to support progress toward IEP goals and peer engagement. These SDCs are noncategorical, which means they serve students in all disability categories.
- **Autism Intervention Class** - SDCs in which students are instructed using techniques specifically designed for children with autism. Students enrolled in this program participate in typical preschool activities.

## 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 resource specialist program (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 to a separate multigrade class for most of the day, which is taught by a special education teacher. The district provides the following special day class (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. The primary goal is to return the students to full-time enrollment in the general education program.
- **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.
- **Cross-Categorical (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.

- **Emotional Disabilities** – 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. The primary goal is to return the students to full-time enrollment in the general education program.
- **Autism Intervention Class** - SDCs in which students are instructed using techniques specifically designed for children with autism. Elementary level classes are instructed in the core academic subjects using district curriculum standards for general education.
- **Deaf/Hard of Hearing** – An SDC at the elementary level for students who are deaf or hard of hearing. The class focuses on the core academic subjects using district curriculum standards for general education.
- **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.

Staff reported the district is in the beginning stages of transitioning its service delivery model to one with more noncategorical SDCs so that additional students can attend their neighborhood school or a school within their community. This change is congruent with principles of LRE, which not only emphasizes where a student spends time at school and how services are provided, but also the relationships a student develops within their school and community. Ideally, a student can attend their home school alongside peers in their own neighborhood and community.

## Out-of-District Programs

In addition to in-district program options, some district students with IEPs attend an out-of-district program at a school in a different SELPA, 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 the district's continuum of service options for students with disabilities overly restricts student access to general education settings.

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 students with disabilities. The district's work to increase access for preschool age students to general education settings and to offer noncategorical SDCs for school-age students so that additional students can attend their neighborhood school or a school within their community will support serving students in their LRE and should continue.

## Recommendations

*The district should:*

1. 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.
2. Continue to prioritize its work to increase access for preschool age students to general education settings.
3. Continue to modify its service delivery model so that additional students can attend their home school or a school within their community.

# District Organization and Central Office Special Education Staffing

## District Organization

The organizational structure of a school district 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 Services Department has 11.65 full-time equivalent (FTE) administrator/leadership positions supporting its preschool and school-age special education programs, as shown in Table 7 below.

**Table 7. Administrator/Leadership Positions Supporting Special Education in 2024-25**

Position Title	Number of Positions	Total FTE
SELPA Director/Special Services	1	0.85
Elementary Program Director	1	1.00
Secondary Program Director	1	1.00
Administrator Social/Behavioral and Intensified Programs	1	1.00
Duncan Holbert Principal	1	0.80
Lead Behaviorist	1	1.00
Program Specialist	5	5.00
Teacher on Special Assignment	1	1.00
<b>Total</b>	<b>12</b>	<b>11.65</b>

Source: District-provided data.

Note: The Administrator Social/Behavioral and Intensified Programs position was not filled at the time of FCMAT's study.

Since Pajaro Valley Unified is a single-district SELPA, the SELPA Director/Special Services position has a dual function: facilitating the district's special education programs and managing the SELPA. Most districts are not single-district SELPAs, so in those districts the director is not responsible for SELPA-related duties such as updating the local plan and facilitating the Community Advisory Committee. Therefore, just the 0.85 FTE of the SELPA director/special services position dedicated to facilitating the district's special education programs is included in this analysis.

The Duncan Holbert Principal position primarily supports the district's preschool program, with 0.20 FTE designated for Early Start (infant services) and 0.80 FTE designated for the preschool program. Thus, 0.20

FTE of that position was not included in the following staffing comparison with similar districts since most do not operate infant programs

## Central Office Administrative Support Positions

The Special Services Department has 5.75 FTE administrative support staff, as shown in Table 8 below.

**Table 8. Administrative Support Staff Positions Supporting Special Education in 2024-25**

Position Title	Number of Positions	Total FTE
Administrative Assistant IV	1	1.00
Administrative Secretary III	1	1.00
Department Staff Accountant	1	1.00
Office Assistant II	1	1.00
Information Systems Technician I	1	1.00
Duncan Holbert Administrative Assistant I	1	0.75
Total	6	5.75

Source: District-provided data.

The Duncan Holbert administrative assistant position primarily supports the district's preschool program, with 0.25 FTE designated for Early Start (infant services) and 0.75 FTE designated for the preschool program. Thus, 0.25 FTE of that position was not included in the following staffing comparison with similar districts since most do not operate infant programs

## 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 Pajaro Valley Unified School District.<sup>1</sup> The survey aimed to collect information on central office staffing within the school districts' special education departments:

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

<sup>1</sup> 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.

Table 9 below compares Pajaro Valley Unified's Special Services Department central office staffing with data from the six school districts that participated in FCMAT's survey. Two of the six school districts that participated in FCMAT's survey were single-district SELPAs like Pajaro Valley Unified. On average, these school districts have 9.17 FTE administrator/leadership positions supporting special education in the central office, while Pajaro Valley Unified reports a higher level of staffing at 11.65 FTE. For special education administrative support positions in the central office, the comparison school districts average 5.07 FTE, whereas Pajaro Valley Unified reports a higher level of staffing at 5.75 FTE.

**Table 9. Administrator and Administrative Support Position Staffing Comparison**

District	County	2023-24 Census Day Enrollment	2023-24 Census Day UPP%	2024-25 Administrator/ Leadership Position FTE	2024-25 Administrative Support Position FTE
ABC Unified	Los Angeles	18,081	62.18%	5.00	6.00
Antioch Unified	Contra Costa	16,045	78.28%	12.00	4.00
Coachella Valley Unified	Riverside	16,276	94.37%	6.00	4.00
Hacienda La Puente Unified	Los Angeles	15,767	78.84%	8.00	6.00
Napa Valley Unified	Napa	16,393	66.31	13.00	5.40
Tracy Joint Unified	San Joaquin	15,100	72.25%	11.00	5.00
<b>Average FTE</b>				<b>9.17</b>	<b>5.07</b>
Pajaro Valley Unified	Santa Cruz	17,520	81.04%	11.65	5.75

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

Notes: Pajaro Valley 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.

Pajaro Valley Unified has 2.48 FTE more administrator/leadership positions and 0.68 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 administrator/leadership positions supporting the special education program are 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 Resource Specialist Program (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 a maximum caseload of 28 students for RSP teachers.

In 2024-25, the district has 20.0 FTE RSP teachers. Based on caseload estimates provided by the district, these teachers manage the cases of 439 students, averaging 21.95 students per teacher, as shown in Table 10 below.

**Table 10: 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	18.0	398	22.11	14.21	+3.79
High School	2.0	41	20.50	1.46	+0.54
<b>Total</b>	20.0	439	21.95	15.68	+4.32

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

Districtwide resource specialist staffing is 4.32 FTE more than what is required to meet the EC 56362(c) caseload standard. However, the students who receive support from a resource specialist are not neatly distributed into groups of 28 across district schools. Thus, 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 met just one of three indicators that measure school age LRE on its annual performance report. In spite of this, the district is close to meeting these indicators and is attempting to operate an inclusive program. Accordingly, resource specialist staffing that exceeds the 1-to-28 teacher-to-student ratio may be needed to provide

sufficient services to meet students' needs; these services are based on factors such as the number of specialized academic instruction (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. In 2024-25, the district has 43.0 FTE education specialist teachers working in SAI-based programs who are not considered RSP teachers but serve students with mild-to-moderate support needs. Based on caseload estimates provided by the district, these teachers manage the cases of 995 students, averaging 23.14 students per teacher, as shown in Table 11 below.

**Table 11: Education Specialist Teacher Staffing for Students with Mild-to-Moderate Support Needs, 2024-25**

School Level	Total Teacher FTE	Total Student Caseload	Average Teacher Caseload	Staffing Needed to Meet Industry Standard	Staffing Above (+) or Below (-) Industry Standard
Elementary School	2.0	49	24.50	2.45 FTE (to meet 1-to-20) 2.04 FTE (to meet 1-to-24)	-0.45 FTE (to meet 1-to-20) -0.04 FTE (to meet 1-to-24)
Middle School	13.0	309	23.77	15.45 FTE (to meet 1-to-20) 12.88 FTE (to meet 1-to-24)	Within Industry Standard Range
High School	28.0	637	22.75	31.85 FTE (to meet 1-to-20) 26.54 FTE (to meet 1-to-24)	Within Industry Standard Range
<b>Total</b>	43.0	995	23.14	49.75 FTE (to meet 1-to-20) 41.46 FTE (to meet 1-to-24)	Within Industry Standard Range

Sources: District-provided data and industry standards.

Districtwide education specialist teacher staffing for SAI-based programs serving students with mild-to-moderate support needs is within the industry standard range.

## Special Day Class Staffing – School-Age Programs

The Education Code does not define class size or caseload maximums for SDC programs. Article X of the district's contract with the teachers' association states the district limits special education class size and/or caseload size for its SDC programs to the maximums shown alongside industry standards for caseload size in Table 12 below.

**Table 12: District Caseload Maximum Size and Industry Standards for Special Day Class Programs**

Type of Program	District Maximum Caseload Size	Industry Standard Caseload Range
Mild/Moderate Support Needs Special Day Class – Noncategorical	Elementary School – 16 students per 1 teacher	Transitional Kindergarten through Grade 12 – 12-15 students per 1 teacher
	Middle School/Junior High School – 20 students per 1 teacher	
	High School – 26 students per 1 teacher	
	Post-Secondary – 26 students per 1 teacher	N/A
Extensive Support Needs Special Day Class – Noncategorical	Elementary School – 13 students per 1 teacher	Transitional Kindergarten through Grade 12 – 10-12 students per 1 teacher
	Middle School/Junior High School – 14 students per 1 teacher	
	High School – 16 students per 1 teacher	
	Post-Secondary – 18 students per 1 teacher	N/A
Special Day Class – Autism Focus	Elementary School – 14 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	Elementary School – 12 students per 1 teacher	8-10 students per 1 teacher
	Middle School/Junior High School – 14 students per 1 teacher	
	High School – 16 students per 1 teacher	
Special Day Class – Deaf and Hard of Hearing	Elementary School – 14 students per 1 teacher	N/A

Sources: District collective bargaining agreement and industry standards.

Notes: There is no industry standard caseload range for comparison for post-secondary SDCs for students with mild/moderate or extensive support needs or for SDCs for students who are deaf or hard of hearing.

District caseload maximums do not exist for SDCs with an autism focus except for at the elementary school level.

All of the district's special education SDC caseload size maximums are higher than the industry standards. The district needs to evaluate whether aligning its SDC caseload guidelines for these programs with industry standards would allow it to provide better service to students.

## Mild-to-Moderate Special Day Class Programs

In 2024-25, the district has 9.0 FTE SDC teachers of classes for students with mild-to-moderate support needs. Based on caseload estimates provided by the district, these teachers manage the cases of 112 students, averaging 12.44 students per teacher, as shown in Table 13 below.

**Table 13: 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	9.00	112	12.44	12-15 students per teacher	9.33 FTE needed to meet 12 students per teacher 7.47 FTE needed to meet 15 students per teacher	Within Industry Standard Range

Sources: District-provided data and industry standards.

The districtwide mild-to-moderate SDC teacher caseload average is within the industry standard range.

## Autism Special Day Class Program

In 2024-25, the district has 9.0 FTE teachers for the autism SDC program. Based on caseload estimates provided by the district, these teachers manage the cases of 112 students, averaging 12.44 students per teacher, as shown in Table 14 below.

**Table 14: Autism Special Day Class Program Teacher Staffing, 2024-25**

Program	Total Teacher FTE	Total Student Caseload	Average Caseload Per Teacher	Industry Standard Caseload Range	Staffing FTE Needed to Meet Industry Standard	Staffing FTE Above (+) or Below (-) Industry Standard
Autism SDC	9.0	112	12.44	8 -10 students per teacher	14.0 FTE (8 students per teacher) 11.2 FTE (10 students per teacher)	-5.0 FTE (8 students per teacher) -2.2 FTE (10 students per teacher)

Sources: District-provided data and industry standards.

The districtwide autism SDC teacher staffing is significantly below the industry standard range of 8-10 students per teacher. The district needs to evaluate whether increasing teacher staffing for its autism SDC program would allow it to provide better service to students.

## Therapeutic Special Day Class Program

In 2024-25, the district has 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 manage the cases of 38 students, averaging 9.50 students per teacher, as shown in Table 15 below.

**Table 15: Therapeutic Special Day Class Program Teacher Staffing, 2024-25**

Program	Total Teacher FTE	Total Student Caseload	Average Caseload Per Teacher	Industry Standard Caseload Range	Staffing FTE Needed to Meet Industry Standard	Staffing FTE Above (+) or Below (-) Industry Standard
Counseling Enriched SDC	4.0	38	9.50	8 -10 students per teacher	4.75 FTE (8 students per teacher) 3.80 FTE (10 students per teacher)	Within Industry Standard Range

Sources: District-provided data and industry standards.

The districtwide counseling enriched SDC teacher caseload average is within the industry standard range of 8-10 students per teacher.

## Extensive Support Needs Special Day Class Program

In 2024-25, the district has 19.00 FTE SDC teachers for students with extensive support needs. Based on caseload estimates provided by the district, these teachers manage the cases of 212 students, averaging 11.16 students per teacher, as shown in Table 16 below.

**Table 16: 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	6.0	61	10.17	8-10 students per teacher – autism focus 10-12 students per teacher – cross-categorical	Within Industry Standard Range	
Middle School	3.0	39	13.00	8-10 students per teacher – autism focus 10-12 students per teacher – cross-categorical	4.88 FTE (8 students per teacher) 3.25 FTE (12 students per teacher)	-1.88 FTE (8 students per teacher) -0.25 FTE (12 students per teacher)
High School	5.0	55	11.00	8-10 students per teacher – autism focus 10-12 students per teacher – cross-categorical	Within Industry Standard Range	
Young Adult Program	5.0	57	11.40	10-12 students per teacher – cross-categorical	Within Industry Standard Range	
<b>Total</b>	<b>19.0</b>	<b>212</b>	<b>11.16</b>	8-10 students per teacher – autism focus 10-12 students per teacher – cross-categorical	Within Industry Standard Range	

Sources: District-provided data and industry standards.

The districtwide extensive support needs SDC teacher caseload average is within the industry standard range for all school levels except for middle school, which is staffed just below the industry standard range.

The district needs to evaluate whether increasing SDC staffing for its middle 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. Article X of the district’s contract with the teachers’ association is silent on special education class size and/or caseload size for its preschool SDC programs. The industry standards for caseload for preschool programs are shown in Table 17 below.

**Table 17: Industry Standards for Preschool Special Day Class Programs**

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

Sources: District collective bargaining agreement and industry standards.

Note: District caseload maximums do not exist for SDCs for preschool age students.

## Preschool Autism Special Day Class Program

In 2024-25, the district has 4.0 FTE teachers for the preschool autism SDC program. Based on caseload estimates provided by the district, these teachers manage the cases of 43 students, averaging 10.75 students per teacher, as shown in Table 18 below.

**Table 18: Preschool Autism Special Day Class Program Teacher Staffing, 2024-25**

Program	Total Teacher FTE	Total Number of Students	Average Caseload Size Per Teacher	Industry Standard Caseload Size	Staffing FTE Needed to Meet Industry Standard	Staffing FTE Above (+) or Below (-) Industry Standard
Preschool Autism SDC	4.0	43	10.75	9 students per teacher	4.78 FTE	-0.78 FTE

Sources: District-provided data and industry standards.

The districtwide preschool autism SDC teacher staffing is below industry standard staffing. This is in part because data was analyzed at the end of the school year, and the district’s preschool numbers grow over the course of the school year as students turn 3 years old and become eligible for the program. Accordingly, the district needs to evaluate start- and end-of-year preschool program numbers to see what trends it can identify and determine whether an additional preschool autism SDC teacher is needed. In addition, the district needs to evaluate whether increasing teacher staffing for its preschool autism SDC program would allow it to provide better service to students.

## Preschool Cross-categorical Special Day Class Program

In 2024-25, the district has 1.0 FTE teacher for the preschool cross-categorical SDC program. Based on caseload estimates provided by the district, this teacher manages the cases of 12 students, as shown in Table 19 below.

**Table 19: 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	1.0	12	12	10-14 students per teacher – cross-categorical	Within Industry Standard Range	

Sources: District-provided data and industry standards.

The districtwide preschool cross-categorical SDC teacher caseload average is 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. Continue to monitor educational specialist teacher staffing and caseloads to ensure they are adequate to meet the industry standard caseload standard and student needs.
3. Evaluate whether aligning its class size goals for its SDC programs with industry standards would allow it to provide better service to students.
4. Continue to monitor teacher staffing and caseloads for its mild-to-moderate and therapeutic SDC programs to ensure they are adequate to meet the industry standard caseload standard and student needs.
5. Evaluate whether increasing teacher staffing for its autism SDC program would allow it to provide better service to students.
6. Evaluate whether increasing teacher staffing for its SDC program for students with extensive support needs at the middle school level would allow it to provide better service to students.
7. Evaluate its start- and end-of-year preschool autism SDC program numbers for the past three years and compare them to this school year's numbers to identify trends and determine whether it needs to increase staffing to meet industry standard and provide better service to students.

# 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 the following types of instructional assistants:

- Behavior technician.
- Instructional assistant speech.
- Instructional assistant mild/moderate.
- Instructional assistant moderate/severe.

The district's SDCs for students with autism or for those with therapeutic support needs are typically staffed with behavior technicians instead of instructional assistants, and its SDCs for students with extensive support needs are usually staffed with a combination of instructional assistants and behavior technicians, depending on student needs. Students requiring 1-to-1 behavioral support are typically assigned a behavior technician to provide that support.

## Industry Standard SDC Instructional Assistant Staffing Ratios

The industry standard base staffing for SDCs is to assign one instructional assistant for every teacher of students with mild-to-moderate and extensive support needs. For SDCs serving students with autism, the 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 20 below.

**Table 20: 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 and their assigned 1-to-1 instructional assistant need to be removed from the ratio.

## District SDC Program Instructional Assistant and Behavior Technician Staffing

The district has established the instructional assistant and behavior technician staffing guidelines for its SDC programs listed below. For all based on a student-to-staff ratio, the teacher and instructional assistant and/or behavior technician are included in the staff part of the ratio.

- SDCs for students with mild-to-moderate support needs are assigned two instructional assistants at the primary level and one instructional assistant at the upper elementary and secondary levels.
- SDCs for students with extensive support needs are staffed using a 1-to-3 adult-to-student ratio.
- SDCs for students with autism are staffed using a 1-to-2 adult-to-student ratio.
- SDCs for students with therapeutic support needs are staffed using a 1-to-3 adult-to-student ratio.

The district's use of staffing guidelines is a positive practice; however, it has no adult-to-student ratio for its SDCs for students with mild-to-moderate support needs. Therefore, depending on the number of students enrolled, those classes may be over- or understaffed. 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 for students with mild-to-moderate support needs.

In addition, the district's adult-to-student ratios for SDCs for students with extensive support needs and autism do not match the industry standards, which may result in more adults providing support than necessary, which as previously stated is costly and may limit students' opportunities to gain independence. The district should consider whether it can revise its adult-to-student staffing ratios to align with industry standards and continue to meet student needs.

When using adult-to-student ratios to determine staffing, the best practice is to include the teacher and classroom instructional assistants and/or behavior technicians in the adult portion of the ratio, and to remove any students who have a 1-to-1 instructional assistant or behavior technician and their assigned 1-to-1 support person from the ratio. The district reported it follows this practice, and it should continue to do so.

FCMAT analyzed the district's 2024-25 instructional assistant and behavior technician staffing in its SDCs. If the district had allocated special education instructional assistants and behavior technicians to its SDC programs in 2024-25 using the industry standard adult-to-student ratios, it may have been able to reduce by 50 SDC instructional assistants and behavior technicians, as shown in Table 21 below.

**Table 21: SDC Instructional Assistant and Behavior Technician Allocation – District Compared to Industry Standards, 2024-25**

School and SDCs	SDC Enrollment	SDC Enrollment Less 1-to-1 Instructional Assistant(s) and/or Behavior Technician(s)	No. of Special Education Classroom Support Instructional Assistant(s) and/or Behavior Technician(s)	Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) and/or Behavior Technician(s) to Students)	Industry Standard Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) and/or Behavior Technician(s) to Students)	Classroom Support Instructional Assistant(s) and/or Behavior Technician(s) Staffing Above (+) or Below (-) Industry Standard
Amesti Elementary SDC M/M 3-5	15	15	2	3-to-15 or 0.20	1-to-7 or 0.14	Equal to Industry Standard
Ann Soldo Elementary SDC Autism TK-2 and 3-5 (2 Classes)	24	22	9	11-to-22 or 0.50	1-to-3 or 0.33	+3 Staff Above the Industry Standard
Aptos High SDC M/M	19	19	1	2-to-19 or 0.11	1-to-7 or 0.14	-1 Staff Below the Industry Standard
Aptos High SDC M/M	19	18	1	2-to-18 or 0.11	1-to-7 or 0.14	-1 Staff Below the Industry Standard
Aptos High SDC Extensive	12	8	3	4-to-8 or 0.50	1-to-5 or 0.20	+2 Staff Above the Industry Standard
Aptos Junior High SDC Extensive	12	8	3	4-to-8 or 0.5	1-to-5 or 0.20	+2 Staff Above the Industry Standard
Bradley Elementary SDC Extensive K-2	9	9	4	5-to-9 or 0.55	1-to-5 or 0.20	+3 Staff Above the Industry Standard
Bradley Elementary SDC Extensive 3-6	10	7	2	3-to-7 or 0.43	1-to-5 or 0.20	+1 Staff Above the Industry Standard
Calabasas Elementary SDC Extensive K-2	9	9	3	4-to-9 or 0.44	1-to-5 or 0.20	+2 Staff Above the Industry Standard
Calabasas Elementary SDC Extensive 3-6	12	9	1	2-to-9 or 0.22	1-to-5 or 0.20	Equal to Industry Standard
Cesar E. Chavez Middle SDC Extensive	14	13	4	5-to-13 or 0.38	1-to-5 or 0.20	+2 Staff Above the Industry Standard
Freedom Elementary SDC M/M 3-4	14	14	1	2-to-14 or 0.14	1-to-7 or 0.14	Equal to Industry Standard

School and SDCs	SDC Enrollment	SDC Enrollment Less 1-to-1 Instructional Assistant(s) and/or Behavior Technician(s)	No. of Special Education Classroom Support Instructional Assistant(s) and/or Behavior Technician(s)	Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) and/or Behavior Technician(s) to Students)	Industry Standard Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) and/or Behavior Technician(s) to Students)	Classroom Support Instructional Assistant(s) and/or Behavior Technician(s) Staffing Above (+) or Below (-) Industry Standard
H.A. Hyde SDC Autism TK-K	13	11	4	5-to-11 or 0.45	1-to-3 or 0.33	+1 Staff Above the Industry Standard
H.A. Hyde Elementary SDC Autism 1-2	12	11	5	6-to-11 or 0.55	1-to-3 or 0.33	+2 Staff Above the Industry Standard
H.A. Hyde Elementary SDC Autism 3-5	13	11	6	7-to-11 or 0.64	1-to-3 or 0.33	+3 Staff Above the Industry Standard
Lakeview Middle SDC Extensive	13	9	3	4-to-9 or 0.44	1-to-5 or 0.20	+2 Staff Above the Industry Standard
Landmark Elementary SDC Autism TK-2	10	10	4	5-to-10 or 0.50	1-to-3 or 0.33	+1 Staff Above the Industry Standard
Landmark Elementary SDC M/M TK-2	11	10	2	3-to-10 or 0.30	1-to-7 or 0.14	+1 Staff Above the Industry Standard
Landmark Elementary SDC Extensive K-2	12	9	2	3-to-9 or 0.33	1-to-5 or 0.20	+1 Staff Above the Industry Standard
MacQuiddy Elementary SDC M/M TK-2	12	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Equal to Industry Standard
MacQuiddy Elementary SDC M/M 3-5	14	14	1	2-to-14 or 0.14	1-to-7 or 0.14	Equal to Industry Standard
Mar Vista Elementary SDC M/M 4-6	11	11	2	3-to-11 or 0.27	1-to-7 or 0.14	+1 Staff Above the Industry Standard
Mintie White Elementary SDC M/M TK-2	13	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Equal to Industry Standard

School and SDCs	SDC Enrollment	SDC Enrollment Less 1-to-1 Instructional Assistant(s) and/or Behavior Technician(s)	No. of Special Education Classroom Support Instructional Assistant(s) and/or Behavior Technician(s)	Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) and/or Behavior Technician(s) to Students)	Industry Standard Adult to Student Ratio (Teacher and Classroom Support Instructional Assistant(s) and/or Behavior Technician(s) to Students)	Classroom Support Instructional Assistant(s) and/or Behavior Technician(s) Staffing Above (+) or Below (-) Industry Standard
Ohlone Elementary SDC M/M 3-5	14	14	2	3-to-14 or 0.21	1-to-7 or 0.14	+1 Staff Above the Industry Standard
Pajaro Valley High SDC Extensive	10	9	3	4-to-9 or 0.44	1-to-5 or 0.20	+2 Staff Above the Industry Standard
Pajaro Valley High SDC Extensive	11	9	3	4-to-9 or 0.44	1-to-5 or 0.20	+2 Staff Above the Industry Standard
Radcliff Elementary SDC Autism TK-K and 1-2 (2 Classes)	26	25	11	13-to-25 or 0.52	1-to-3 or 0.33	+4 Staff Above the Industry Standard
Rio Del Mar Elementary SDC Autism K-2 and 3-6 (2 Classes)	24	22	14	16-to-22 or 0.73	1-to-3 or 0.33	+8 Staff Above the Industry Standard
Valencia SDC M/M 3-6	9	8	1	2-to-8 or 0.25	1-to-7 or 0.14	Equal to Industry Standard
Valencia Elementary SDC Extensive 3-6	10	7	3	4-to-7 or 0.57	1-to-5 or 0.20	+2 Staff Above the Industry Standard
Watsonville High SDC Extensive	12	9	5	6-to-9 or 0.67	1-to-5 or 0.20	+4 Staff Above the Industry Standard
Watsonville High SDC Extensive	12	9	3	4-to-9 or 0.44	1-to-5 or 0.20	+2 Staff Above the Industry Standard

Source: Industry standards and district-reported data.

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

The preschool SDCs and SDCs for students with therapeutic support needs were not analyzed because FCMAT does not have an industry standard adult-to-student ratio for these types of SDCs.

For certain schools, the autism class analysis represents combined student enrollment and staffing for the entire SDC autism program at that school and is not listed by class because only schoolwide data was provided.

The district's instructional assistant and behavior technician staffing in its SDCs is significantly higher than the industry standards, in part because its base staffing assignments are not aligned with industry standards. The district should evaluate whether it can reduce the number of instructional assistants and behavior technicians in its SDCs and still meet student needs.

## 1-to-1 Student Support

There is no established industry standard for special education instructional assistants providing 1-to-1 paraeducator 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 meet student needs by assigning extra instructional assistant classroom support instead of 1-to-1 instructional assistant 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 a SCIA assessment process to determine whether a student requires 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 SCIA 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 SCIA assessment is used consistently.

In 2024-25, the district has 65 instructional assistants and behavior technicians who are assigned to provide 1-to-1 student support. Most staff providing 1-to-1 student support are behavior technicians who work between five and eight hours per day, with most working six hours per day. Although there is no industry standard for comparison, this is a higher number of staff providing 1-to-1 student 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 1-to-1 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 1-to-1 support may be well meaning, according to the [University of Colorado at Denver's Paraprofessional Resources and Research Center](#), it can hinder the student's education in the following ways:

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

- The paraeducator may create social barriers between the student they are supporting and the student's peers.

## Best Practices in 1-to-1 Student Support Assignment

In addition to using an assessment to determine whether a student requires 1-to-1 student support, LEAs should also identify when during the school day a student requires 1-to-1 student support and assign this only for those times (e.g., for mathematics or during recess). This is an alternative to assigning a staff person to provide the student with 1-to-1 support for the entire school day, which is only necessary for certain students. It would also help 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 or behavior technician to more than one student when appropriate.

Part of the SCIA assessment process focuses on planning for a student's transition to independence and developing annual IEP goals to support this. Staff reported that they do not consistently write goals for independence or plans to reduce a student's reliance on 1-to-1 support when it is added to a student's IEP. Doing so would be a good practice because it focuses IEP services on addressing deficit areas to strengthen skills, allows the student's IEP team to monitor annual progress, and helps them determine whether adjustments to the level of service are needed. Staff identified resistance from parents as the main barrier to reducing or removing 1-to-1 student support, regardless of whether this support is necessary or beneficial to the student.

## Recommendations

*The district should:*

1. Use the industry standard adult-to-student ratios to help determine the assignment of special education instructional assistants and behavior technicians to SDCs. Determine whether it can reduce instructional assistant and behavior technician staffing while still meeting student needs.
2. Continue to consistently use its SCIA assessment to determine whether a student requires 1-to-1 student support.
3. Consistently evaluate whether a student determined to require 1-to-1 student support needs it for the entire school day, or just part of it. Only assign a student 1-to-1 support when it is required.
4. Determine whether staff providing 1-to-1 support for a student who only requires it for part of the school day can provide 1-to-1 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. Ensure that each IEP that calls for 1-to-1 student 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 adapted physical education (APE) teachers, occupational therapists, physical therapists, credentialed school nurses, school psychologists, speech and language pathologists (SLPs), teachers for students who are deaf/hard of hearing, and teachers for students who are visually impaired. Staffing ratios for other related service providers were not analyzed because there is no established industry standard for them. The industry standards for related service providers are shown in Table 22 below.

**Table 22: 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 district's contract with the teachers' association stipulates a maximum caseload size of 45 students for APE teachers.

In 2024-25, the district has 5.8 FTE APE teacher positions, each with an average caseload of 42.07 students receiving direct services, as shown in Table 23 below.

**Table 23: 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	5.8	244.0	42.07	1-to-45-55	5.42 FTE (to meet 1-to-45) 4.44 FTE (to meet 1-to-55)	+0.38 FTE (above 1-to-45) +1.36 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 is staffed just above the industry standard staffing level range for APE teachers. 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 district's contract with the teachers' association does not stipulate a caseload size for school nurses.

In 2024-25, the district has 11.0 FTE credentialed school nurse positions, each with an average caseload of 1,554 students, as shown in Table 24 below.

**Table 24: Credentialed School Nurse Staffing, 2024-25**

Provider	Number of FTE Positions	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	11.0	17,089	1,554	1-to-2,274	7.51 FTE	+3.49 FTE

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

As shown in the table, the district is staffed significantly above the industry standard staffing levels for credentialed school nurses. The district needs to annually 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 occupational therapists.

In 2024-25, the district has 10.6 FTE occupational therapist positions, each with an average caseload of 39.25 students receiving direct services, as shown in Table 25 below. The district does not use certified occupational therapy assistants (COTAs).

**Table 25: 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	10.6	416	39.25	1-to-45-55	9.24 FTE (to meet 1-to-45) 7.56 FTE (to meet 1-to-55)	+1.36 FTE (above 1-to-45) +3.04 FTE (above 1-to-55)

Sources: District-provided data and industry standards.

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

As shown in the table, the district is staffed above the industry standard staffing level range for occupational therapists. Staff reported that the number of students who receive consultation services from an occupational therapist increases the number of occupational therapists needed. However, the district does

not recognize that it is staffed higher than the industry standard. The district needs to review occupational therapist caseload projections, assessment loads, the number of schools each occupational therapist serves, driving time between schools, direct and consultation service minutes, and students' needs to determine if it can reduce the number of occupational therapists and continue to meet students' needs.

## Physical Therapy

The district's contract with the teachers' association does not stipulate a caseload size for physical therapists.

In 2024-25, the district has a 1.0 FTE physical therapist position, who has a caseload of 22.0 students receiving direct services, as shown in Table 26 below.

**Table 26: 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	1.0	22.0	22.0	1-to-45-55	0.49 FTE (to meet 1-to-45) 0.40 FTE (to meet 1-to-55)	+0.51 FTE (above 1-to-45) +0.60 FTE (above 1-to-55)

Sources: District-provided data and industry standards.

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

As shown in the table, the district is staffed above the industry standard staffing level range for physical therapists. Staff reported that the number of students who receive consultation services from a physical therapist increases the number of physical therapists needed. In addition, since it can be difficult to fill a part-time physical therapist position, current physical therapist staffing may be justified. The district needs to annually review physical therapist caseload projections, assessment loads, the number of schools each physical therapist supports, driving time between schools, direct and consultation service minutes, and students' needs to determine if it needs to change physical therapist staffing.

## School Psychologists for School-Age Programs

The district's contract with the teachers' association does not stipulate a caseload size for school psychologists.

In 2024-25, the district has 19.0 FTE school psychologist positions; 17.5 FTE of these positions serve school-age programs, each with an average caseload of 976.51 students, as shown in Table 27 below. The district's other 1.5 FTE school psychologists serve the infant or preschool programs and were not included in this staffing comparison.

**Table 27: 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	17.5	17,089	976.51	1-to-977	17.49 FTE	+0.01 FTE

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

Note: The district's 1.5 FTE school psychologists who serve the infant or preschool programs were not included in this staffing comparison.

As shown in the table, the district is staffed at the industry standard staffing levels for school psychologists for school-age programs. Staff reported that school psychologists who serve the school-age program work in the comprehensive role of a school psychologist, which means they provide social-emotional and behavioral support, consult with teachers, provide 1-to-1 counseling, and complete assessments. Staff reported that most of these psychologists' time is spent on initial and triennial psychoeducational assessments. 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. The district also contracts with the county of Santa Cruz's Children's Behavioral Health for mental health support.

Staff reported that the high number of initial 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 school psychologists. 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

The district's contract with the teachers' association aligns its caseload maximums for preschool and school age SLPs with California Education Code limits.

### 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 has 2.9 FTE SLPs who work exclusively with preschool age students; 0.9 FTE of these SLPs primarily administer assessments, so they were excluded from this analysis. The remaining 2.0 FTE SLPs providing therapy for preschool-age students each have an average caseload of 39 students receiving a direct service, as shown in Table 28 below.

**Table 28: 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 Contract and Education Code Provider-to-Student Ratio	Staffing Above (+) or Below (-) Contract and Education Code Standard Provider-to-Student Ratio
SLPs for Preschool	2.0	78	39	1-to-40	1.95 FTE	+0.05 FTE

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

**Note:** Only preschool-age students receiving direct services from a SLP were included in the caseload average for comparison with the EC 56441.7(a) maximum.

The district's 0.9 FTE SLP who primarily administers preschool assessments was not included in this staffing comparison. In addition, the district's 1.0 FTE SLP serving infants was not included in this staffing comparison.

As shown in the table, the district is staffed almost exactly at the Education Code maximum for SLPs serving preschool-age students. The district needs to review SLP caseload projections and students' needs to determine if its preschool SLP staffing is adequate.

### 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 2.0 FTE SLPs who work with preschool-age and school-age students. These SLPs have an average caseload of 41 students receiving a direct service, as shown in Table 29 below.

**Table 29: 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 Industry Standard Provider-to-Student Ratio	Staffing Above (+) or Below (-) Industry Standard Provider-to-Student Ratio
SLPs for Preschool-Age and School-Age Students	2.0	82	41	1-to-47.5	1.73 FTE	+0.27 FTE

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

Note: Only preschool-age and school-age students receiving direct services from a 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 at approximately the industry 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 SLP 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 has 23.2 FTE SLPs working exclusively with school-age students who each manage an average caseload of 52.72 students receiving a direct service, as shown in Table 30 below. The district also has a 2.0 FTE SLPs supporting students in both the preschool-age and school-age programs who were excluded from this analysis.

**Table 30: 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	23.2	1,223	52.72	1-to-55	22.24	+0.96 FTE

Sources: District-provided data and EC 56363.3.

Notes: Only students receiving direct services from an SLP who serves only school-age students were included in the caseload average for comparison with the EC 56363.3 maximum.

The district's 2.0 FTE SLPs who serve students in both the preschool-age and school-age programs were 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 review SLP caseload projections and students' needs to determine if its SLP staffing for SLPs serving school-age students is adequate.

## Teachers for Students Who are Deaf or Hard of Hearing

The district's contract with the teachers' association stipulates a maximum caseload size of 45 students for itinerant deaf or hard of hearing (DHH) teachers.

In 2024-25, the district has 3.8 FTE itinerant teachers for students who are deaf or hard of hearing. These teachers have an average caseload of 27.63 students receiving direct services, as shown in Table 31 below.

**Table 31: Staffing for Itinerant Teachers for Students Who are Deaf or Hard of Hearing, 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
Itinerant Teachers for Students Who are Deaf or Hard of Hearing	3.8	105	27.63	1-to-15-25	7.00 FTE (to meet 1-to-15) 4.20 FTE (to meet 1-to-25)	-3.20 FTE (below 1-to-15) -0.40 FTE (below 1-to-25)

Sources: District-provided data and industry standards.

Notes: Only students receiving direct services from the district's teacher for students who are deaf or hard of hearing were included in the total caseload and related calculations.

As shown in the table, the district is staffed at less than the industry standard staffing level for itinerant teachers for students who are deaf or hard of hearing. The district needs to review caseload projections, the assessment load, the number of schools served, driving time between schools, direct and consultation service minutes, and students' needs to determine whether it needs to increase staffing for teachers for students who are deaf or hard of hearing.

## Teachers for Students Who are Visually Impaired

The district's contract with the teachers' association stipulates a maximum caseload size of 35 students for teachers of students who are visually impaired.

In 2024-25, the district has 1.5 FTE itinerant teachers for students who are visually impaired, each with an average caseload of 18 students receiving direct services, as shown in Table 32 below.

**Table 32: Staffing for Itinerant Teachers for Students Who are Visually Impaired, 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
Itinerant Teachers for Students Who are Visually Impaired	1.5	27.0	18.0	1-to-10-30	Within Industry Standard Range	

Sources: District-provided data and industry standards.

Notes: Only students receiving direct services from the district's itinerant teachers for students who are visually impaired were included in the total caseload and related calculations.

As shown in the table, the district is staffed within the industry standard staffing level range for itinerant teachers of students who are visually impaired. The district needs to annually review caseload projections, the assessment load, the number of schools served, driving time between schools, direct and consultation

service minutes, and students' needs to determine whether it needs to change staffing for teachers for students who are visually impaired.

## Recommendations

*The district should:*

1. Annually review staffing for all related service providers to determine whether it is aligned with the industry standards and meets student needs.
2. Evaluate whether it can reduce its staffing for adapted physical education teachers, credentialed school nurses, occupational therapists and physical therapists to align with industry standards while still meeting students' needs.
3. Evaluate whether its staffing for SLPs and itinerant teachers for students who are deaf or hard of hearing is sufficient to meet student 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.

# Professional Development Plan

A district's professional development plan should consider the needs of students with disabilities and align with evidence-based practices, such as Universal Design for Learning (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.

## District Professional Development Plan

Over the past three school years, the district has provided professional learning for teachers, instructional leaders, and certain support staff in MTSS, PBIS, inclusive practices and Safety-Care, which is a competency-based crisis prevention intervention training program. The district has provided limited professional learning addressing UDL, but UDL training has not occurred districtwide.

## Universal Design for Learning

As the district continues its work to implement its MTSS, 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 not all educators in the district believe that students with disabilities are general education students first. 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 service needs, are best served in SDCs rather than general education settings. The district has provided 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 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, receive nonviolent crisis intervention training, and some receive additional informal training from a teacher or another instructional assistant. However, most staff members indicated that instructional assistants have unmet training needs in crucial areas such as:

- Disability awareness.
- Implementing accommodations and modifications.
- Positive behavior supports.
- Differentiation strategies.

This training deficiency is exacerbated by staff turnover and a lack of dedicated, paid training time for special education instructional assistants. A 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. Develop a plan to facilitate better access for instructional assistants to professional learning in areas such as disability awareness, positive behavior supports, implementing accommodations and modifications, and differentiation strategies.

# 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, which was introduced and signed into law in 1997 and 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 Standardized Account Code Structure (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.

During the period reviewed, 2021-22 to 2023-24, the district did not consistently identify special education expenses. Expenses for retroactive salary increase payments, and part of the expenses related to salaries, benefits, mileage, testing protocols and payments for services related to home and hospital instruction, school psychologists, speech and language therapists, credentialed school nurses and licensed vocational nurses (LVNs) were omitted from the MOE calculation. In addition, the district could not provide rationale for the percentage of total transportation program expenses charged to the special education program.

## 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, some districts include expenses such as legal/settlement and transportation costs in this reporting, 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.

Districts need to record all special education expenses to the proper SACS special education goal code according to the California School Accounting Manual (CSAM). By not doing so, the district cannot evaluate whether its unrestricted general fund contribution is excessive compared to other districts or is increasing disproportionately compared to other costs.

The district identifies its special education related legal and settlement costs, and part of its special education transportation costs as special education expenses. However, it excludes a large portion of its costs related to the direct instruction and support of students in the special education program from its special education expenses. For this analysis, FCMAT added costs for several ongoing special education expenses, which were not consistently reported as such over the review period. FCMAT took the total cost for certain positions providing direct instruction and support to students in both the general education and special education programs and applied a percentage to split the costs between these two programs as shown in Table 33 below. The costs attributed to the special education program following this split were added to the expenses that had been assigned a SACS special education goal code.

**Table 33: Percentage of Time Certain Positions Support Students in the Special Education Program and the Percentage of Total Costs FCMAT Charged to Special Education for this Review**

Position	Percent of Time Supporting Students in the Special Education Program	Percent of Mileage and Supplies FCMAT Charged to Special Education	Percent of Testing Protocols and Vendor Service Contracts FCMAT Charged to Special Education
Home and Hospital Instructor	75%	75%	N/A
School Psychologist	70%	70%	100%
Speech and Language Pathologist	90%	90%	100%
School Nurses (credentialed and LVN)	60%	60%	60% of LVN and credential school nurse contracts only

Sources: District-provided data.

The amounts added to the special education expenses reported in SACS for the services listed in Table 33 included: \$8,416,806 in 2021-22, \$9,102,059 in 2022-23, and \$9,657,066 in 2023-24. This was necessary to calculate an unrestricted general fund contribution inclusive of as many special education student expenses as FCMAT could identify from district data, and to create consistency over the three-year review period.

Because of the size and complexity of the district's mental health program, and the lack of data to determine the percentage of services being provided just to students in the special education program, all identifiable expenses related to its mental health program were excluded from this analysis. These excluded expenses were: \$2,042,204 in 2021-22, \$1,515,210 in 2022-23 and \$1,314,775 in 2023-24.

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 \$2,008,281 in 2021-22, \$877,834 in 2022-23, and \$14,807 in 2023-24. It appears that special education expenditures charged to these one-time state and federal income sources were ongoing and were budgeted by the district as such beginning in 2022-23.
- FCMAT used only special education expenses in the comparison. In 2022-23 the district charged some non-special education expenditures to a grant (Special Ed: ARP IDEA Part B, Sec. 611, Local Assistance Coordinated Early Intervening Services), which was specifically allocated for special education and services for early interventions and students not yet identified as special education students. To ensure that the unrestricted general fund contributions are attributed solely to special education services, FCMAT excluded \$192,447 in 2022-23 from its calculation.
- The district included 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:
  - Elementary and Secondary School Emergency Relief Fund (ESSER).

- Extended Learning Opportunities Program Grant.
- In-Person Instruction Grant.
- Educator Effectiveness Grant.
- Learning Communities for School Success Program.
- Other restricted local funds.

FCMAT added the following amounts back to the contribution amount for comparison purposes: \$518,075 in 2021-22, \$1,107,835 in 2022-23, and \$179,505 in 2023-24. The impact of the one-time funding on the unrestricted general fund contribution dropped to \$123,504 in the 2024-25 second interim budget as these funds were exhausted.

- 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. For continuity of data, FCMAT made modifications to the district's reported prior year indirect costs charged to special education to account for the adjustments listed above.

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's expenses for the entire transportation program, including general education home-to-school transportation and transportation for students who receive it as a related service in their IEP, were split by multiplying the total transportation program budget by approximately 52% to determine a cost for special education transportation. However, as described in the "[Total Transportation Program Cost](#)" section of this report, the district does not effectively track and differentiate between expenditures for these two programs when determining the percentage of costs charged to each program. Based on district-reported annual general education and special education fleet mileage for 2023-24, FCMAT estimates that a more accurate split would be to apply 65% of total transportation expenditures to the special education home-to-school transportation program and 35% to the general education home-to-school transportation program. Therefore, FCMAT adjusted special education transportation program expenses to charge 65% of the total transportation program costs to the special education program.

In addition, transportation income is not reported since the CSAM has not developed a method to match the income with the expense. For 2024-25, the district's special education transportation expenses, if allocated at 65% of total transportation program expenditures, are projected to increase its special education MOE by \$8 million. However, the estimated \$2.7 million in special education transportation income for 2024-25 is not credited to the SACS special education goal code and is not reduced from the district's unrestricted general fund contribution.

## 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 2022-23 and 2023-24 income was excluded), and excluding identifiable mental health expenses, as shown in Table 34 below.

**Table 34: Comparison of Special Education Expenses Using Ongoing Income Only and Excluding Mental Health Expenses, 2022-23 to 2024-25**

Category	Historical 2022-23	Historical 2023-24	Projected 2024-25	Average Historical Annual Rate
Increase/Decrease in Special Education Students	-1.0%	0.01%	-1.1%	-0.7%
Increase/Decrease in Ongoing Income	11.3%	-0.9%	5.1%	5.2%
Increase in Certificated Salaries	11.3%	7.9%	2.4%	10.0%
Increase/Decrease in Non-Transportation Classified Salaries	23.7%	-4.7%	6.5%	8.9%
Increase in Transportation Classified Salaries and Benefits	11.5%	6.4%	3.3%	9.3%
Increase in Non-Transportation Benefits	6.1%	10.1%	7.6%	8.4%
Increase/Decrease in Books and Supplies	-17.7%	-2.8%	81.1%	-10.0%
Increase/Decrease in Transportation Supplies	26.4%	-10.0%	18.2%	6.9%
Increase/Decrease in Services (Excluding Transportation and County Mental Health)	9.5%	-14.4%	-12.5%	-3.2%
Increase in Services (Transportation Only)	25.5%	6.6%	27.1%	16.9%
Increase/Decrease in Transportation Capital Expenditures	0%	100%	-100%	50.0%
Increase in Indirect Costs	16.2%	0.8%	14.1%	8.6%
Increase in Adjusted General Fund Contribution	13.6%	3.1%	4.3%	8.5%
Adjusted Dollar Amount of General Fund Contribution	\$45,173,430	\$46,572,078	\$48,667,025	N/A
Adjusted Dollar Amount of Special Education Expenses	\$66,796,802	\$68,008,170	\$71,201,843	N/A

Sources: Official SACS unaudited actuals, 2024-25 second interim SACS data, and [Enrollment by Subgroup for Charter and Non-Charter Schools - Pajaro Valley Unified](#) (CA Dept of Education).

Notes: Official SACS unaudited actuals and 2024-25 income and general fund contribution data were reduced by mental health income and expenses and one-time income in 2021-22, 2022-23, and 2023-24, and indirect costs were adjusted. 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.

Amounts and percentages in the "Increase/Decrease in Ongoing Income," "Increase in Adjusted General Fund Contribution," and "Adjusted Dollar Amount of General Fund Contribution" categories were amended to exclude expenses charged to mental health and non-special education ongoing income, and for adjusted indirect costs.

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

## Special Education Funding and Expenses

The average increase in ongoing special education funding over the review period was 5.2% per year. In 2024-25, the district is projecting a 5.1% increase in special education income.

In 2023-24, the number of students identified for special education was relatively flat, but expenses continued to increase.

## Staffing Costs

From 2021-22 to 2023-24 special education certificated staff salaries, excluding transportation and mental health program support, increased by 20%. Special education classified employee salaries, excluding

transportation, increased by 17.8% over the same period. From 2021-22 to 2023-24, there was an average annual increase of approximately 6.5% per year in instructional assistant/behavior technician expenses, which included raises, additional positions and/or the cost for contracted instructional assistant/behavior technician services. The district is projecting an additional 8.8% increase in instructional assistant/behavior technician expenses in 2024-25, which appears reasonable.

## Cost of Nonpublic School Services

According to district-provided data the number of students attending an NPS increased by four students between 2021-22 and 2023-24 but increased by 10 students, or 56%, between 2023-24 and 2024-25 as shown in Table 35 below.

**Table 35: District-Reported NPS Enrollment, 2021-22 through 2024-25**

	2021-22	2022-23	2023-24	2024-25
Number of Students	14	20	18	28

Sources: District-provided data.

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 did not adjust the 2024-25 budget to account for the increased NPS tuition expenses until second interim when the budget was increased by \$1.8 million or 17.11%. The district reported that its average per-student cost for a student to attend an NPS has fluctuated from a low of \$92,390 to a high of \$125,644 per student over the review period. These average per-student costs exclude a student whose costs were significantly higher than average, \$185,000 in 2021-22 and 2022-23. The district submitted an extraordinary cost pool reimbursement request to the CDE for this student, and some additional funding to support the student was received.

## Transportation Costs

All of the district's capital expenditures were related to transportation. Transportation supply costs (primarily fuel and tires) and service costs (primarily contracted services) are increasing at higher rates, which are much more linear, than other special education expenses. The 2024-25 budget for special education transportation appears to be underbudgeted in salaries and benefits and overbudgeted in supplies and services. Despite this, the cumulative 2024-25 budget for special education transportation appears reasonable. This trend data may indicate less reliance on contracted drivers.

## District Unrestricted General Fund Contribution

The district's adjusted unrestricted general fund contributions, including expenditures for adjusted indirect costs and increases or reductions for one-time income and redirected income, are shown in Table 36 below.

**Table 36: District's Adjusted Unrestricted General Fund Contributions to Special Education, 2021-22 through 2023-24**

Category	2021-22	2022-23	2023-24
Adjusted Unrestricted General Fund Contribution	\$39,772,294	\$45,173,430	\$46,572,078
Percentage of Adjusted Special Education Costs	67.17%	67.63%	68.48%

Sources: Official SACS unaudited actuals data.

Note: Official SACS unaudited actuals income and unrestricted general fund contribution data were adjusted for mental health revenue and expenses and one-time income in 2021-22, 2022-23 and 2023-24. Expenses include adjusted indirect costs.

In 2023-24, the district's unrestricted general fund contribution (using adjusted indirect costs and excluding mental health revenues and expenditures and one-time income) was 68.48% 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 and increased staffing expenses, many of which were initially charged to COVID-19 funding, and not coded to special education goals. The large increase in salaries and benefits in 2022-23 was due to the inclusion of expenses not originally charged to special education revenues or goals in the SACS, while other one-time sources of funding were available.

In 2024-25, the district's adjusted unrestricted general fund contribution as a percentage of total special education costs is projected to decrease to 68.35%.

## 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.

Between 2006 and 2014 several of the district's cases heard by the Office of Administrative Hearings (OAH) set precedents that have been used for other OAH decisions. For example, the cases of E.M. versus Pajaro Valley Unified School District (2011) and Pajaro Valley Unified School District versus J.S. (2006) are frequently cited as the basis for judicial decisions. However, the district has not had any cases settled before the OAH since 2014, which may mean that the district has been more successful in settling disputes at the local level. At the time of FCMAT's fieldwork the district did not have any OAH hearings scheduled.

The district's special education related legal fees and settlement costs have declined significantly over the past three years as shown in Table 37 below.

**Table 37: District's Special Education Related Legal Fees and Settlement Costs, 2021-22 through 2023-24**

Category	2021-22	2022-23	2023-24
Legal Fees	\$145,719	\$90,546	\$92,636
Settlement Costs (excluding tuition costs)	\$371,217	\$84,459	\$88,067

Sources: District-reported data.

The best practice is for the Business Services and Special Services departments to regularly monitor budgets for special education related legal fees and settlement costs. Although the district establishes budgets for special education related legal fees and settlement costs, staff reported that the Special Services Department does not have access to the detailed budgets. In 2024-25, the district budgeted \$150,000 for legal fees and \$215,000 for settlement costs, which appears sufficient. However, the district should begin providing a detailed budget to the Special Services Department so it can better monitor these expenditures.

## Recommendations

*The district should:*

1. Consider funding positions that serve both special education and general education students, such as credentialed school nurses, school psychologists, home and hospital instructors and bus drivers, in proportion to the student populations they serve. Ratios used to split how positions are funded should be based on data.
2. Use position control information in budget development and hiring for special education salaries and benefits, particularly if the revenue source is not a special education SACS resource.
3. Review position control as it relates to instructional assistant/behavior technician placements. Reconcile payroll to position to budget, paying particular attention to positions filled with contractors.
4. Pay all salary and benefit costs from special education goals, including retroactive salary increases.
5. Charge employee mileage, protocols and employee supplies that support the special education program to the special education goal in the SACS.
6. Consider applying the income earned by transportation prior to the application of the unrestricted general fund contribution to the special education program.
7. Disaggregate, monitor and track transportation, NPA and NPS costs, and annually analyze trend data to use for budgeting.
8. Continue to have leaders in the Special Services Department participate in the budgeting process and provide access to current available balances and allocations within their budget.
9. Continue to monitor its unrestricted general fund contribution to the special education program.

# 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 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. Subsequent Transportation Services Plans adopted by the district's governing board must be adopted each year by April 1 unless the district chooses to adopt a multiyear plan.

## District Transportation Funding

Since the inception of the LCFF, the district has received \$2,673,110 for school transportation. Its 2022-23 unaudited actuals financial report indicates that the district spent \$9,470,047 for school transportation. The district did not report any capital expenses in 2022-23, which would have reduced its eligible transportation related expenses for reimbursement. Sixty percent of the district's eligible school transportation expenditures in 2022-23 was \$5,682,028.20. Consequently, the district received an additional \$3,008,918.20 in school transportation funding in 2023-24 due to the Budget Act of 2022. The district reported \$11,371,368 in student transportation expenditures under Function 3600 in 2023-24, 60% of which will be eligible for reimbursement.

# District Transportation Costs

## Total Transportation Program Cost

The district's 2024-25 adopted budget projects \$12,281,737 in total transportation program expenditures, which appears consistent with actual and projected expenditures to date. 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 applies a percentage split to its total transportation budget to differentiate between general education and special education transportation expenses, and then it makes a contribution from its unrestricted general fund to cover the special education transportation expenses.

In 2024-25, the district budgeted \$6,357,335 for special education transportation expenses, which is 52% of the projected total transportation program expenditures. However, the district does not effectively track and differentiate between expenditures for its general education home-to-school transportation program and its special education home-to-school transportation program when determining the percentage of costs charged to the two programs. Based on district-reported annual general education and special education fleet mileage for 2023-24, FCMAT estimates that a more accurate split would be to apply 65% of total transportation expenditures to the special education home-to-school transportation program and 35% to the general education home-to-school transportation program. However, instead of applying a percentage split to the total transportation expenditures, the district needs to begin tracking fleet and labor expenditures for the special education and general education programs separately. This would enable the district to know the true costs of the two programs.

## Transportation Cost Per Student

The district's 2024-25 budget shows it is projected to spend \$211,754 this year to operate each district bus, and \$2,829 per student for transportation. This average per-student cost includes students receiving general education home-to-school transportation and students who receive transportation as a related service in their IEP. Compared to what is observed across the state, this average per-student cost is high. However, most districts separate expenditures for their general and special education transportation programs. Since the district does not effectively separate these expenses, the comparison is not valid.

The state stopped collecting school transportation data with the implementation of the LCFF, but the Budget Act of 2022 required school transportation data collection to resume. Upon its publication, if the district begins tracking fleet and labor expenditures for the special education and general education transportation programs separately, it will be able to conduct a thorough comparison of recent per-student transportation costs.

## Recommendations

*The district should:*

1. 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.

## Special Education Transportation Program

In 2024-25, the district reported it provides transportation for 494 students who receive transportation as a related service in their IEP. The district has an internal Transportation Department that transports 431 of these students on 29 school buses. This equates to an average special education ridership ratio of 14.9 students per school bus, which is within the statewide average of 10-15 students per special education bus route. The district's internal transportation department also transports 21 students in vans operated by district employees.

In 2024-25, the district augments its internal student transportation program by using four contracted external transportation providers, including Adriot, FirstAlt, Everdriven, and Michael's Transportation. In 2023-24, the district spent approximately \$71,996 per month to transport students who received transportation as a related service in their IEP through Adriot and Everdriven. In addition, Michael's Transportation provided both special education and general education transportation as needed, with an average monthly expense in 2023-24 of \$32,789. The number of students transported by these three external transportation providers fluctuated throughout the year due to staff vacancies on district operated bus routes. FirstAlt was not used for student transportation in 2023-24.

Table 38 below shows the average monthly cost for the two contracted external transportation providers in 2023-24 for students who received transportation.

**Table 38: Average Monthly Expense by External Transportation Providers for Students Receiving Transportation as a Related Service in their IEP, 2023-24**

External Transportation Provider	Service Period	Average Monthly Expense
Adriot	1 month	\$62,136
Everdriven	1 month	\$9,860
Total	N/A	\$71,996

Sources: District-provided data.

The district's expense for contracted external transportation providers is high, and two of the four contractors the district is using in 2024-25 are transportation network companies (TNCs). A TNC typically subcontracts driver operators who transport one to four students in alternative passenger transportation vehicles. Districts typically use TNCs to meet individual or small-group transportation needs, such as to transport a student to a unique program location with limited student attendance or an out-of-district program in which using a district school bus for just a few students would be inefficient. The district's other two contracted external transportation providers use nonbus passenger vehicles or school buses.

The dispatcher responsible for special education transportation routing coordinates student transportation using district buses, alternative passenger vehicles and contracted external service providers. Certain students are preidentified for routing through a contracted external service provider due to factors such as student behavioral or health needs, program location, or to shorten the student's ride time. Staff reported that they could use the district's internal transportation program more often if it had sufficient staffing and reduced bus driver absenteeism, which is discussed further in the "Transportation Department Staffing" section of this report. The district needs to perform a cost benefit analysis to explore whether it can increase its use of internal district transportation service and reduce its use of contracted external transportation providers.

## Recommendations

*The district should:*

1. Begin tracking external transportation provider expenditures for the special education and general education programs separately so the true cost of contracted services for each program can be known.
2. Perform a cost benefit analysis to explore whether it can increase its use of internal district transportation service and reduce its use of contracted external transportation providers.
3. Immediately develop alternative driver recruitment strategies to attract and retain certified school bus drivers and alternative vehicle operators to enhance its internal transportation capacity and reduce reliance on costly contracted external transportation providers.

## 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 18.5% of its students with IEPs receive transportation. The district reported it uses a transportation decision rubric and has established "Transportation Guidelines for IEP Team to Consider in the Transportation of Students" to ensure that only students meeting disability or program location criteria receive district transportation services. However, the percentage of students with IEPs receiving student transportation is higher than what is observed across the state, which suggests that transportation may be identified too broadly and not be aligned with IDEA guidelines. Additionally, it may indicate inconsistent use of the transportation decision rubric and guidelines when determining transportation needs. The high percentage of students receiving transportation also contributes to the district's relatively high transportation costs.

## Recommendation

*The district should:*

1. Review its transportation decision rubric and guidelines to ensure they align with legal requirements and best practices for authorizing transportation as a related service in a student's IEP, and ensure they are consistently used.

## Transportation Department Staffing

The district's director of transportation oversees both internal transportation operations and manages the contracted external transportation providers. Based on the transportation program's size, having a dedicated Transportation Department is reasonable and aligns with common models observed across the state.

In 2024-25, the district's Transportation Department has the positions listed in Table 39 below. Given the district and transportation program size, the number of support positions appears adequate.

**Table 39: Transportation Department Positions and Full-Time Equivalent or Number of Staff, 2024-25**

Position	FTE	Notes
Transportation Director	1.0 FTE	
Transportation Supervisor	1.0 FTE	
Administrative Assistant	1.0 FTE	
State Certified Trainer-Driver/Safety	1.0 FTE	This employee was on leave at the time of FCMAT's fieldwork.
Driver/Designated Behind-the-Wheel Instructor	2.0 FTE	
Dispatchers	4.0 FTE	
Transportation Router	1.0 FTE	
Lead Mechanic	2.0 FTE	
Mechanic (AM)	2.0 FTE	
Mechanic (PM)	2.0 FTE	
Automotive Repair (Support Fleet)	1.0 FTE	
Bus Driver	54 Positions (Varied FTE)	Fifteen positions were vacant at the time of FCMAT's fieldwork.
Van Driver	4 Positions	

Source: District-reported data.

The number of staff supporting the district's vehicle maintenance program is consistent with what is observed across the state; however, leadership of the district's vehicle maintenance program is shared between the two lead mechanics. The district needs to assess whether there is an operational advantage to creating a vehicle maintenance supervisor position to manage fleet replacement and support continued building of the infrastructure for and the acquisition of electric vehicles.

In addition, even though the district's director of transportation is a state-certified school bus instructor, the size of the district's transportation program warrants one to two dedicated state-certified school bus instructors. Therefore, the district needs to ensure its state-certified trainer-driver/safety position is filled.

## Bus Driver Absenteeism

The district's Transportation Department faces persistent daily absenteeism of bus drivers, significantly hindering its ability to provide reliable student transportation. Despite using contracted external services, staff reported general education home-to-school routes are frequently canceled, often with little notice. The Transportation Department's staffing model includes eight "floater" drivers who are permanent employees without assigned routes intended to cover daily driver absences. However, during FCMAT's on-site visit, six of the eight floaters were absent, leaving only two to cover four uncovered routes. Twelve total drivers were absent due to illness or approved personal leave. As a result, the Transportation Department's designated behind-the-wheel trainers, dispatchers and router filled in as drivers, and six general education home-to-school routes were canceled. Staff reported that they cancel general education routes because special education transportation is legally required.

Staff reported that an average of seven to 10 drivers are absent daily. Parents are notified of route cancellations through the district's Parent Square messaging system, but they often have only hours or minutes to make alternate transportation arrangements for their student. These frequent, last-minute cancellations have become routine, which staff reported has led to widespread frustration and anger among parents. Transportation Department staff reported being frustrated as well, since they are routinely assigned to cover routes for absent drivers, and certain nondriver staff have been assigned as a regular driver on an open/vacant route to create consistency.

The district needs to address the reported chronic absenteeism in the Transportation Department. The habitual need for nondrivers to cover routes is affecting Transportation Department operations. Combined with the fact the district has vacant routes due to staffing shortages, this causes significant disruptions in reliable general education home-to-school transportation, which is inconvenient for parents and may cause some students to miss school. The district needs to review its policies and procedures related to chronic staff absenteeism and begin addressing this problem.

## Recommendations

*The district should:*

1. Consider whether there is an operational advantage to creating a vehicle maintenance supervisor position to coordinate fleet replacement and alternative electric vehicle acquisition and infrastructure.
2. Ensure its state certified trainer-driver/safety position is filled.
3. Review its policies and procedures related to chronic staff absenteeism and begin addressing this problem.

## Technology

The district has four transportation dispatchers and one router. While all dispatchers share the same job description, two manage general education routes (split by route numbers), one manages field trips, and one manages special education routes. The district uses TransFinder (Student Finder) routing software. The router, who is new in the position and started after initial TransFinder implementation and training, enters student data and assigns students to routes using a North/South regional model to balance dispatcher workload.

Approximately half of the students have been entered into TransFinder because the Technology Department encountered problems when attempting to query and upload student data from the district's student information system, Synergy. As a result, the general education dispatchers manually assign students to long-standing routes that have not been optimized using the TransFinder routing software. Although eligible students are issued Radio Frequency Identification (RFID) bus passes, which are designed for students to tap as they board and disembark from the bus, the district does not use any onboard technology to track ridership in this way. Instead, it relies on driver-reported counts, which staff acknowledge are unreliable.

Full implementation of the TransFinder routing software will enhance the efficiency and ease of student routing. For special education student routing, efficiencies gained by use of the software may result in higher student ridership ratios and reduced routes through optimization. The district needs to immediately provide comprehensive TransFinder routing software training for the router and assess other staff's profi-

ciency with the software and then provide additional training for other staff as necessary. In addition, the Transportation Department needs to continue to collaborate with Technology Department staff to ensure proper integration of student data, allowing for accurate routing and ridership tracking.

## Recommendations

*The district should:*

1. Provide comprehensive TransFinder routing software training for the transportation router.
2. Assess how proficient other staff in the Transportation Department are with TransFinder routing software and provide additional training as necessary.
3. Continue to facilitate collaboration between the staff in the Technology and Transportation departments to ensure proper integration of student data, allowing for accurate routing and ridership tracking.

## 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 December of 2023 and 2024. 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

The district’s fleet includes 93 school buses of varying sizes and passenger vans, and the vehicle maintenance team also supports 230 additional district vehicles. The district’s bus fleet is aging, with the oldest operating bus a model year 1991 and the newest a model year 2014. The district’s average model year for its bus fleet is 2002. In addition, the district has eight Crown transit buses dating back to 1978, 1986 and 1987 that are being retained for possible future air quality bus grant trade-ins. The district’s fleet inventory listing did not include individual bus mileage; therefore, an average fleet mileage could not be calculated.

Staff reported that it is not uncommon for a bus to break down on the side of the road. On average, seven district fleet buses are out of service daily, which is high and affects fleet availability to meet transportation

route demands. The district needs to create a long-term bus replacement schedule and strive to begin annual replacement of older buses.

The district has 12 Thomas electric vehicles (EVs), model years 2013 and 2014, which are the newest vehicles in the bus fleet. As the district transitions to using more EVs, specialized training for maintenance staff on EVs will be essential.

## 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. FCMAT audited the district's school bus inspection reports and school bus maintenance records and found that the 45-day, 3,000-mile inspections are performed at the required intervals.

Like most Transportation Department personnel, all vehicle mechanics cover bus routes almost daily because of bus driver vacancies and absenteeism. This affects vehicle work orders, and staff reported vehicle preventative maintenance inspections can become backlogged. Certain mandated school bus safety inspections have run close to exceeding the 45-day, 3,000-mile criteria for inspection. Further, when vehicle maintenance staff substitute for bus drivers almost daily, student safety may be compromised if attention is removed from ensuring shop work orders and preventative maintenance schedules are performed on time. The district needs to consider whether it can discontinue having the vehicle maintenance team work as substitute bus drivers.

In addition, as the district moves toward full compliance with SB 88, student alternative passenger vehicles like the vans used by the district must meet specific criteria for both inspections and safety equipment. The district needs to develop vehicle maintenance inspection schedules to meet SB 88 criteria.

## Recommendations

*The district should:*

1. Develop a long-term bus replacement schedule and strive to begin annual replacement of older buses.
2. Evaluate staff training needs for electric vehicles.
3. Consider whether it can discontinue having the vehicle maintenance team work as substitute bus drivers.
4. Develop vehicle maintenance inspections schedules to meet SB 88 criteria.

## 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 bus driver instructor position. The employee in that position was on leave at the time of FCMAT's fieldwork. In addition, the district has two designated behind-the-wheel instructors who were reported to be providing classroom instruction, which is outside of the scope of their training. At the time of FCMAT's fieldwork, the designated behind-the-wheel instructors were reported to be applying to attend the training program to become state-certified bus driver instructors. Even though the district's new director of transportation is a state-certified bus driver instructor, due to the size of the Transportation Department, the district needs to consider elevating both of its designated behind-the-wheel instructors to the position of state-certified bus driver instructor upon their successful completion of the CDE-OST course. In addition, the district needs to consider whether to backfill the two designated behind-the-wheel instructor positions if they become vacant to assist the state-certified bus driver instructor(s) with behind-the-wheel training.

## 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 compliant with 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 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 SB 88, effective July 1, 2024, the district must enroll any staff who transport students in district vehicles in its Pull Notice program. This includes van drivers providing home-to-school transportation, and teachers and coaches providing other student transportation. In addition, the district's contracted external transportation providers must also comply with California Department of Motor Vehicles' Employer Pull Notice program standards.

Staff reported that the Human Resources Department enrolls all Transportation Department commercial drivers and Class C operators in the Pull Notice program and ensures they are enrolled in a drug and alcohol testing program, as required by Section 34520.3 of the California Vehicle Code. Staff reported that the Human Resources Department is working toward identifying other district staff outside of the Transportation Department who may transport students in district vehicles to enroll them in the Pull Notice program. The district needs to aggressively implement procedures to ensure that all district staff who may transport students in district alternative passenger vehicles meet the requirements of SB 88. In addition,

the district needs to develop a process to make sure its contracted external transportation providers operating alternative passenger vehicles meet the requirements of SB 88.

## Evacuation Drills and Student Safety

Education Code 39831.5 requires districts to conduct school bus emergency evacuation drills annually. Since all but two of the district's bus routes are for students in special education, physical evacuations are conducted only by students able to perform the evacuation drill. 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. The district has scheduled required evacuation drills for 2024-25 and at the time of FCMAT's visit was still completing them. The district needs to prioritize completing all annual mandated safety instruction and evacuation drills during the first few weeks or months of the school year.

## Recommendations

*The district should:*

1. Consider placing both of its designated behind-the-wheel instructors into the position of state-certified bus driver instructor upon their successful completion of the CDE-OST course.
2. Consider whether to backfill the two designated behind-the-wheel instructor positions to assist the state-certified bus driver instructor(s) with behind-the-wheel training if it acts on recommendation one.
3. Immediately enroll all district staff or volunteers who transport students in district alternative passenger vehicles in the California Department of Motor Vehicles' Employer Pull Notice program.
4. Implement a procedure to ensure that all contracted external transportation providers meet the requirements of SB 88.
5. Ensure that all required evacuation drills are completed as early as possible each school year and continue to provide necessary accommodations for students with disabilities during these drills.

# Appendix

## A: Study Agreement



## **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 Pajaro Valley 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, adaptive 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-saving 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 board of trustees at a public meeting following the completion of the review.

**B. Services and Products to be Provided**

**1. Orientation Meeting**

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

**2. Fieldwork**

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

**3. Exit Meeting**

The Team will hold an exit meeting at the conclusion of the fieldwork to inform the Client of the status of the study. The exit meeting will include a review of the scope

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

4. Exit Letter

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

5. Draft Report

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

6. Final Report

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

7. Board Presentation

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

8. Follow-Up Review

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

**3. PROJECT PERSONNEL**

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

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

**4. PROJECT COSTS**

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

- A. \$1,100 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 \$33,000.**

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

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

## **5. RESPONSIBILITIES OF THE CLIENT**

- A. Return current organizational chart(s) that show the Client's management and staffing structure with the signed copy of this Agreement. Organizational charts should be relevant to the scope of this Agreement.
- B. Provide private office or conference room space for the Team's use during fieldwork.
- C. Provide for a Client employee to upload all requested documents and data to FCMAT's online SharePoint repository per FCMAT's instructions. Provide FCMAT with the name and email of the person who will be responsible for collecting and uploading documents requested by FCMAT with the signed copy of this Agreement.
- D. Provide documents and data requested on the Team's initial and supplementary document request list(s) by the date requested.

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

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

- E. Ensure appropriate senior-level staff are available for the orientation and exit meetings.
- F. Facilitate access to requested board members, officers and staff for interviews.
- G. Facilitate access to requested information and facilities to include, but not be limited to, files, sites, classrooms and operational areas for observation.
- H. Review a draft of the report and return it to FCMAT by the date FCMAT requests with any comments regarding the accuracy of the report's data or the practicability of its recommendations. The Team will review this feedback in a timely manner and make any adjustments it deems necessary before issuing the final report.
- I. Return the requested evaluation survey to FCMAT as described below.

## 6. **PROJECT SCHEDULE**

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

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

<b>ACTION</b>	<b>TIMELINE</b>
FCMAT provides the Client with a draft Agreement.	Draft Agreements are usually provided within 20 business days of the Client's initial request for services.
Client returns partially executed Agreement to FCMAT along with the applicable organizational chart and the name and email of the of person who will be responsible for collecting and uploading documents requested by FCMAT.	Draft Agreements are valid for 30 business days.
FCMAT returns a fully executed Agreement to the Client and identifies the	Within five business days of the Client's return of the signed Agreement.

<b>ACTION</b>	<b>TIMELINE</b>
project schedule and the lead and other personnel assigned to the job.	
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: Jenny Im, Chief Business Officer

Telephone: (201) 527-5860

Email: [jenny\\_im@pvusd.net](mailto:jenny_im@pvusd.net)

## 17. SIGNATURES

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

For Client:



Dr. Heather Contreras, Superintendent  
Pajaro Valley Unified School District

Date

For FCMAT:

**Michael H. Fine** Digitally signed by Michael H. Fine  
Date: 2024.11.18 17:05:53 -08'00'

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

Date