

Special Education Review

October 18, 2024

Budget

Amount		Additional Income	
4,500	Details	Month	Amount
2,500	Mid Year Bonus	June	2,000
	Year End Bonus	December	3,000
		January	5,000

Planned Expenses	
Expenditure	Month
November vacation	November
Home for the holidays	December
Gifts for family	December
Family vacation	July
	January
	January
	January
	January

Annual Budget by Month		
April	May	June
9,915	13,220	16,000
2,000	7,000	7,000
	0	

Saugus Union
School District

Michael H. Fine
Chief Executive Officer

October 18, 2024

Colleen Hawkins, Ed.D., Superintendent
Saugus Union School District
24930 Avenue Stanford
Santa Clarita, CA 91355

Dear Superintendent Hawkins:

In May 2024, the Saugus Union 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:

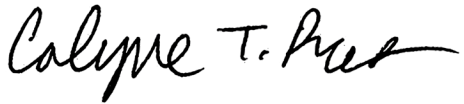
1. Review the district's implementation of student success teams, response to instruction and intervention, and multitiered system of supports, and make recommendations for improvement, if any.
2. Analyze special education teacher staffing ratios, class sizes and caseloads using statutory requirements 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 district's professional development/training program as it relates to special education, and make recommendations for improvement, if any.
9. Review the district's unrestricted general fund contribution to special education and make recommendations for greater efficiency, if any.
10. 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 draft report contains the study team's findings and recommendations. Please review this document and provide any factual corrections by November 1, 2024. If you have questions regarding the report, please contact me at cbeno@fcmat.org or (530) 723-3892.

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

Sincerely,

A handwritten signature in black ink, reading "Carolynne T. Beno". The signature is fluid and cursive, with the first name being the most prominent.

Carolynne Beno, Ed.D., CFE
FCMAT Chief Analyst

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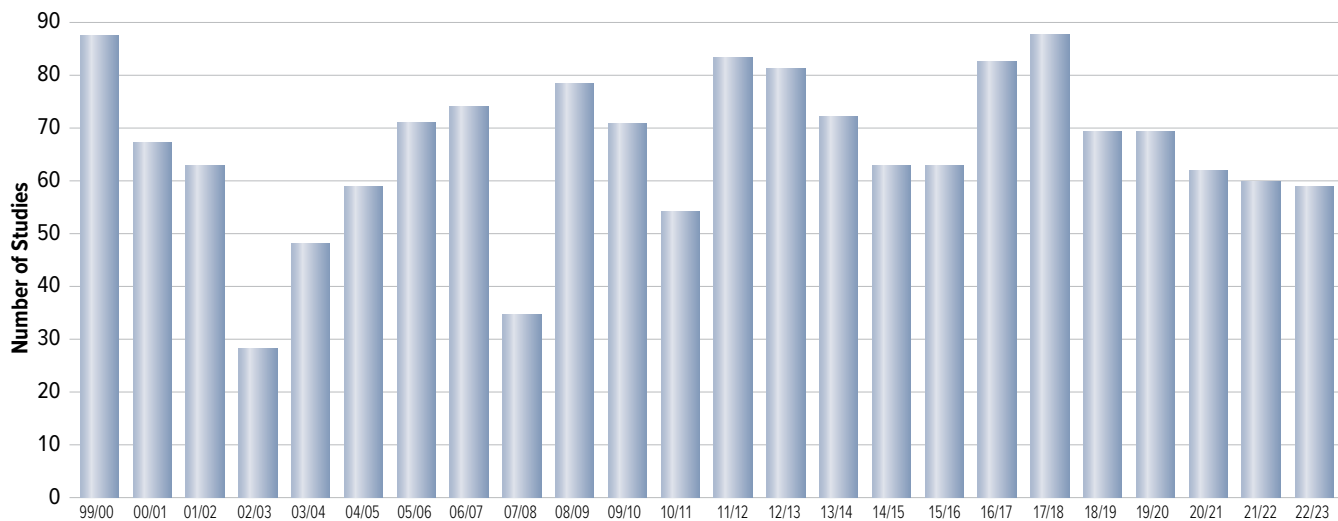
About FCMAT

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

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

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

Studies by Fiscal Year



FCMAT has continued to make adjustments in the types of support provided based on the changing dynamics of TK-14 LEAs and the implementation of major educational reforms. FCMAT also develops and provides numerous publications, software tools, workshops and professional learning opportunities to help LEAs operate more effectively and fulfill their fiscal oversight and data management responsibilities. The California School Information Services (CSIS) division of FCMAT assists the California Department of Education with the implementation of the California Longitudinal Pupil Achievement Data System (CALPADS). CSIS also hosts and maintains the Ed-Data website (www.ed-data.org) and provides technical expertise to the Ed-Data partnership: the California Department of Education, EdSource and FCMAT.

FCMAT was created by Assembly Bill (AB) 1200 in 1991 to assist LEAs to meet and sustain their financial obligations. AB 107 in 1997 charged FCMAT with responsibility for CSIS and its statewide data management work. AB 1115 in 1999 codified CSIS' mission.

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

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

On September 17, 2018 AB 1840 was signed into law. This legislation changed how fiscally insolvent districts are administered once an emergency appropriation has been made, shifting the former state-centric system to be more consistent with the principles of local control, and providing new responsibilities to FCMAT associated with the process.

Since 1992, FCMAT has been engaged to perform more than 1,400 reviews for LEAs, including school districts, county offices of education, charter schools and community colleges. The Kern County Superintendent of Schools is the administrative agent for FCMAT. The team is led by Michael H. Fine, Chief Executive Officer, with funding derived through appropriations in the state budget and a modest fee schedule for charges to requesting agencies.

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Introduction

Background

Located in the Santa Clarita Valley in northern Los Angeles County, the Saugus Union School District is governed by a five-member board and serves students from transitional kindergarten through grade six. The district encompasses approximately 94 square miles and comprises 15 school sites. According to [DataQuest](#), the district enrolled a total of 9,192 students during the 2023-24 academic year.

Saugus Union is a member of the Santa Clarita Valley Special Education Local Plan Area (SELPA), which is a regional service delivery model for special education. In 2023-24, 15.36% of the district's students were identified as requiring special education, which was above the statewide noncharter school average of 13.85% calculated from [DataQuest](#) for students in transitional kindergarten through grade six.

In May 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 September 3, 4, and 5, 2024, to conduct interviews with district and school administrators, special education teachers, related service providers, paraeducators, and other support 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, a comprehensive guide to usage and accepted style that emphasizes conciseness, clarity and plain language. In addition, this guide discourages the use of jargon and capitalizes relatively few terms.

Study Team

The study team was composed of the following members:

Carolynne Beno, Ed.D., CFE
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

Special Education Identification

According to DataQuest, the district's census day enrollment has declined over the past five years, but its special education enrollment has increased. In 2023-24, 15.36% of the district's transitional kindergarten through sixth grade students were identified as requiring special education, which was just below the countywide noncharter average, but 1.51 percentage points above the statewide average. FCMAT calculated the percentage of students enrolled in special education at each of the district's elementary schools. After excluding special day class enrollment, FCMAT found that the percentage of students enrolled in special education at certain district schools is more than double that of other schools.

Identifying students for special education when they do not require it is not a best practice and increases special education costs. When they are not enrolled in special education, students experience less stigma, increased access to rigorous instruction given in general education, and more interactions with their typically developing peers. Increases in the percentage of students identified for special education in the district appear to be caused by its student study team (SST) process, multitiered systems of support (MTSS), and exit procedures, as described below.

- **SST Process** — Historically, the district did not have a districtwide SST process, which was a deliberate decision intended to grant schools autonomy to develop their own processes and prereferral interventions. However, the district has been working to standardize processes such as the SST across district schools. Staff reported that use of the district's SST process is inconsistent from school to school, and at certain schools, the SST process is viewed as a pathway leading to a special education assessment instead of an opportunity for a student to receive appropriate interventions in response to their differing needs. The district needs to establish an expectation that all schools use the district's SST process, provide training, and proactively monitor, support, and require its consistent use.
- **MTSS** — Since the return to school following the COVID-19 pandemic, the district has been working to standardize the supports and interventions offered across district schools. It has adopted districtwide focus areas, initiatives and curriculum, and offers districtwide professional development. The district has been contracting with the Los Angeles County Office of Education to provide Positive Behavioral Interventions and Supports (PBIS) training for district leaders and school PBIS teams. Staff reported that parts of the PBIS program are being implemented at all district schools and that it supports positive student behavior at the schools where staff view the program positively and implement it strictly. The district needs to continue its work to define and provide training on its MTSS to address students' academic, behavioral, and social-emotional needs and to provide PBIS training and support for schools.
- **Student Exit Procedures from Special Education** — Many district staff indicated that certain students are not being transferred or "exited" from special education according to the two-pronged (i.e., has two criteria) test at their three-year (triennial) individualized education program (IEP) meeting if they no longer qualify for special education. As previously stated, students experience less stigma, have increased access to rigorous instruction given in the general education curriculum, and have more interactions with their typically developing peers when they are not enrolled in a special education program. In addition, general education students can continue to access academic, behavioral, and social-emo-

tional interventions and supports through the district's MTSS. A student's exit from special education is evidence of both the student's and the program's success. The district needs to evaluate its special education exit rates by at least school, grade level and disability, and provide professional development on proper exit procedures from special education.

District Continuum of Special Education Options

The district offers a full continuum of special education options and services through district programs, Santa Clarita Valley SELPA programs, and nonpublic schools (NPSs). However, the district did not meet four of six targets measuring least restrictive environment (LRE) in its most recent local level annual performance report. This indicates that the district's continuum of service options for students with disabilities overly restricts student access to general education settings and interactions with neurotypical peers. Providing access to general education settings and fostering interactions with neurotypical peers are essential for maximizing the performance and outcomes of students with disabilities.

The district has begun shifting its service delivery model to improve access for students with disabilities to general education settings through its collaborative preschool classes and inclusion program. This expansion of inclusive opportunities is a best practice and should continue because it is strongly aligned with the recommendations in *One System: Reforming Education to Serve All Students, Report of California's Statewide Task Force on Special Education* and supported by empirical research discussed in the "Placement in the Least Restrictive Environment" section of this report. Accordingly, the district needs to continue to offer more inclusive opportunities for school-age students with disabilities in general education settings and to reduce the enrollment of students with mild-to-moderate support needs, such as learning disabilities, in special day classes (SDCs). In addition, the district needs to evaluate its RISE preschool classes to determine whether the IEP goals for students in those programs could instead be met in collaborative preschool classes, which would improve their access to the LRE.

Special Education Staffing

FCMAT analyzed the adequacy of district special education staffing for the central office, special education teachers, special education paraeducators, and related service providers using comparison districts, state-wide guidelines and/or industry standards, and found the following:

- **Central Office** – Saugus Union has a similar number of positions supporting the special education program compared to the average of the seven comparison districts, with 0.50 FTE fewer administrator/leadership positions and 0.25 FTE fewer administrative support positions.
- **Resource Specialist Program (RSP)** – In 2023-24, the districtwide average resource specialist program (RSP) teacher caseload size was over the maximum required by the Education Code. The district needs to review its RSP teacher caseload projections for 2024-25 to determine if additional teachers need to be hired so its student-to-teacher ratio is under the maximum.
- **Special Day Class (SDC) Programs** – In 2023-24, preschool SDC class sizes and school age noncategorical SDC caseloads for students with mild-to-moderate and extensive support needs were aligned with the industry standards. In the same year, the district's Building Academic and Social Emotional Success (BASES) program was staffed more than 1.00 FTE above what was required to meet the industry standard student-to-teacher ratio. According to staff, the BASES program required a lower student-to-teacher ratio in

2023-24 to support student needs, and in 2024-25, the district was able to reduce by 1.00 FTE BASES teacher. In 2023-24, the district's school-age Regional Autism Program (RAP) staffing was below what was required to meet the industry standard student-to-teacher ratio. The district needs to review RAP teacher caseloads and student needs for 2024-25 to determine if increasing staffing to align with industry standards would allow it to provide better service to students.

- **Special Education Paraeducators** – The district uses industry standard base classroom staffing to assign paraeducators to its SDCs. If the district added an adult-to-student ratio to its paraeducator staffing for SDCs, it might be able to reduce staffing by up to two special education paraeducators in 2023-24. While no industry standard exists for 1-to-1 paraeducators, in 2023-24, the district had 80 paraeducators providing 1-to-1 student support. This is a relatively high number for a school district of this size compared to what FCMAT has observed across the state. The district needs to consistently use the Santa Clarita SELPA's Special Circumstances Instructional Assistance (SCIA) School Day Description and Support Needed, known as the "daily grid," to determine when to provide 1-to-1 paraeducator support during a student's school day. This will prevent a student from being assigned 1-to-1 support during parts of the school day when they do not require it. Use of the daily grid will also maximize the student's independence and may allow the district to assign a 1-to-1 paraeducator to more than one student. In addition, the district needs to ensure that each IEP with 1-to-1 paraeducator support, except for medically necessary support, contains goals for independence and a transition or "fade" plan that is actively monitored.
- **Related Service Providers** – In 2023-24, district staffing for adapted physical education teachers and occupational therapists was aligned with industry standard provider-to-student ratios. In 2023-24, district staffing for school nurses and school psychologists was above the industry standard provider-to-student ratios. The district needs to evaluate the factors described in the "Related Service Provider Staffing and Caseloads" section of this report to determine if it should change school nurse or school psychologist staffing. In 2023-24, district staffing for speech and language pathologists (SLPs) was approximately 2.00 FTE below the level needed to comply with the caseload maximums outlined in Education Code (EC) 56441.7(a) and EC 56363.3. The statewide shortage of SLPs is contributing to the district's SLP caseloads being over the Education Code maximums. The district needs to review SLP caseload projections for 2024-25 to determine if it needs to increase its SLP staffing to meet student needs and the EC 56441.7(a) and EC 56363.3 caseload maximums.

General Fund Contribution to Special Education

In 2023-24, the district's unrestricted general fund contribution to special education was \$17,794,094, or 55.17% of total special education costs. In 2024-25, the district's unrestricted general fund contribution to special education is projected to increase to 56.27% of total special education costs.

School Transportation

Since the inception of the Local Control Funding Formula (LCFF), the district has received \$386,613 annually for school transportation. The Budget Act of 2022 increased school transportation funding to the equivalent of the prior year's student transportation expenditures reported in Standardized Account Code Structure (SACS) Function 3600, beginning in the 2022-23 fiscal year. The district received \$348,992 in

additional school transportation funding in 2023-24. To optimize its transportation funding, the district needs to ensure it reports expenses for all staff who ride on school buses to support students under transportation expenditures in SACS Function 3600.

In 2022-23, the district spent \$9,430 per student for school transportation. At the time of FCMAT's fieldwork, the district was projected to spend \$15,878 per student for school transportation in 2024-25. Because of substantial increases in the cost of transportation labor and operations across the state since the COVID-19 pandemic, these increases may be within the new norm. The Budget Act of 2022 reinstated the requirement to publish school transportation data. Once this data is published, the district can conduct a thorough comparison of recent per-student transportation costs.

At the time of FCMAT's visit, the district was providing special education transportation to 130 students, which is approximately 9% of the students with an IEP. This percentage is typical of what FCMAT has seen across the state, indicating that the district's IEP process is effective in determining whether transportation is required as a related service.

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Findings and Recommendations

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

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

In 2013, California convened a statewide special education task force dedicated to ending persistent poor outcomes for California's students with disabilities, including infants, toddlers, preschoolers, and students up to age 22 in kindergarten through grade 12 schools. The task force's purpose was to study the complex systems designed to serve students with disabilities and to forward recommendations to the State Board of Education, the Commission on Teacher Credentialing, and the California Department of Education (CDE). In March 2015, the task force published *One System: Reforming Education to Serve All Students, Report of California's Statewide Task Force on Special Education*, as well as an executive summary.

The *Statewide Special Education Task Force Project Summary* found that:

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.

This project summary explained that operating special education as a separate program is contrary to current research that suggests:

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.

The 2015 report on One System identified the following 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 project summary identified a need to transform the understanding of special education from being:

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,”¹ 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*, explains 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 examined the 2015 report on One System's seven focus areas and made 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, districts should focus on achieving coherence, fostering inclusive practices, and integrating student support systems to build a comprehensive educational system that promotes positive outcomes for all students. Districts need to recognize that students who receive special education services are general education students first and operate with the understanding that special education services are one of the many programs of support under general education rather than a place where students go to receive more or different services. These tenets will be used throughout this report to analyze the district's organization, staffing and continuum of service options, and to inform current recommendations for improvement.

1 WestEd: Success for Every Learner. (n.d.). <https://www.wested.org/about-us/>

District Organization and Central Office Special Education Staffing

District Organization

A district's organizational structure plays a critical role in shaping its special education program's effectiveness. A district should be organized to foster effective communication and collaboration among departments in its central office and with its schools. This collaboration is necessary to address the unique needs of students with disabilities and to implement evidence-based practices that promote inclusive education.

The district's administrative cabinet includes the superintendent and the assistant superintendents of the Business Services, Educational Services, Human Resources and Student Support Services departments, as shown in Figure 1 below. The assistant superintendent of student support services oversees the director of student support services, who provides leadership over the special education program.

Simplified District Organizational Chart — 2024-25

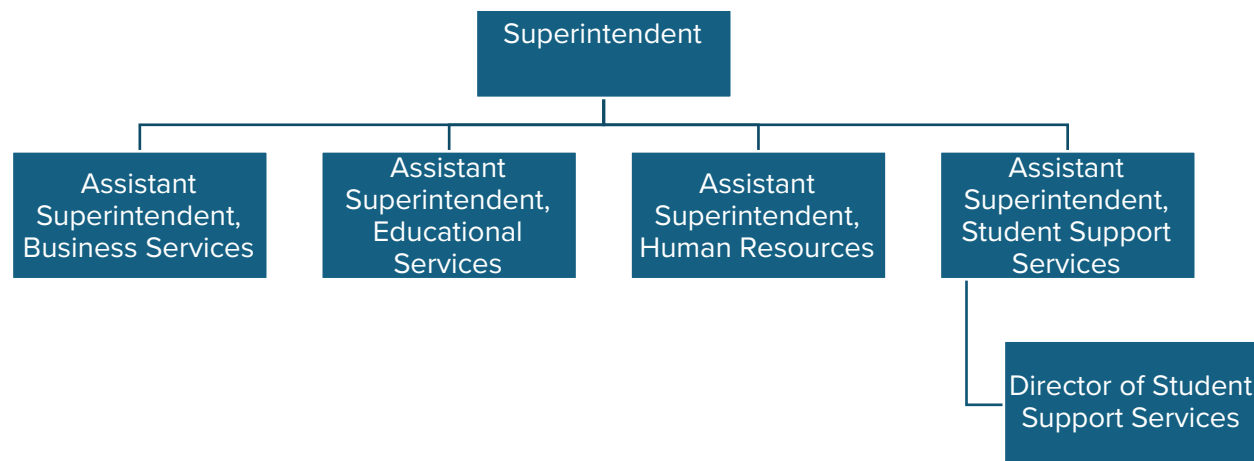


Figure 1. A simplified version of the district's organizational chart that shows administrative cabinet and the director of student support services.

Source: District-provided documents.

The district's organization promotes regular communication and collaboration. The assistant superintendent of student support services is part of the district's administrative cabinet, and the director of student support services meets weekly with other department directors to solve problems and discuss items such as district initiatives. Staff reported interdepartmental collaboration has increased over the past several years, and special education staff members are now included in activities such as districtwide professional learning, curriculum adoption initiatives, and Local Control and Accountability Plan² (LCAP) development. These collaboration structures are in agreement with the 2015 report on One System in that they provide regular opportunities for communication and coordination among general education and special education staff to promote the development of well-integrated models of support for students with disabilities.

2 A three-year plan that describes the goals, actions, services, and expenditures to support positive student outcomes.

Special Education Administrator and Administrative Support Staffing

Administrator/Leadership Positions

The Student Support Services Department has 5.00 full-time equivalent (FTE) administrator/leadership positions, as shown below in Table 1.

Table 1: Administrator Positions Supporting Special Education, 2024-25

Position Title	Number of Positions	Total FTE
Director of Student Support Services	1	1.00
Coordinator of Student Support Services	1	1.00
Program Specialist	3	3.00
Total	5	5.00

Source: District-provided data.

Note: One of the program specialist positions was unfilled at the time of FCMAT's visit.

Administrative Support Positions

The Student Support Services Department has four administrative support positions partly devoted to special education program support, as shown below in Table 2.

Table 2: Administrative Support Staff Positions Supporting Special Education, 2024-25

Position Title	Number of Positions	Total FTE
Confidential Administrative Assistant	1	0.50
Administrative Secretary	1	0.80
Student Database Analyst	1	0.85
Department Secretary	1	0.50
Total	4	2.65

Source: District-provided data.

Note: The Student Support Services Department's Spanish translator/interpreter position was excluded from the total number of positions because school districts do not always centralize the services this position provides. In such cases, these services are provided by staff at individual schools.

Special Education Staffing Comparison

FCMAT conducted an informal survey among school districts in California with student enrollment and unduplicated pupil percentages³ (UPP) similar to Saugus Union. The survey focused on gathering information about these districts' Special Education Department central office staffing in two areas:

3 This acronym refers to the percentage of students who are English learners, foster youth, or qualify for free or reduced-price meals. A student is counted only once even if they are in more than one of these categories.

1. **Central office administrator/leadership positions:** This includes roles such as directors, assistant directors, coordinators, program specialists, and teachers on special assignment (TOSAs.) These positions do not require an administrative credential.
2. **Central office administrative support positions:** This includes roles such as secretaries, administrative assistants, filing clerks, and data technicians.

Table 3 on the following page compares Saugus Union's Student Support Service Department's central office staffing to the responses from the seven districts that replied to FCMAT's survey. Among these comparison districts, the average number of FTE leadership/administrator positions supporting special education in the central office is 5.50, while Saugus Union reports a lower figure of 5.00 FTE. In terms of special education administrative support positions in the central office, the average among the comparison districts is 2.90 FTE, whereas Saugus Union reports a slightly lower figure of 2.65 FTE.

Table 3: Leadership and Administrative Support Staffing Comparison, 2024-25

District	County	2023-24 Census Day Enrollment	2023-24 Census Day UPP%	2024-25 Administrator/ Leadership Position FTE	2024-25 Administrative Support Position FTE
Buckeye Union Elementary School District	El Dorado	10,189	33.95%	2.00	0.80
Carlsbad Unified School District	San Diego	10,832	21.34%	4.50	2.50
Fremont Union High School District	Santa Clara	9,646	17.91%	7.00	6.00
Oak Grove Elementary School District	Santa Clara	8,714	51.97%	3.00	2.00
Roseville Joint Union High School District	Placer	12,626	42.38%	7.00	2.00
San Dieguito Union School District	San Dieguito	12,364	19.70%	8.00	3.00
Sequoia Union High School District	San Mateo	9,741	37.45%	7.00	4.00
Average FTE				5.50	2.90
Saugus Union	Los Angeles	9,192	37.88%	5.00	2.65

Sources: Comparisons (Ed-Data) and district-provided information in response to FCMAT survey.

Notes: "Census Day Enrollment" and "Census Day UPP%" data from the most recent year available.

Saugus Union was excluded from the average FTE calculations.

Teachers on special assignments (TOSAs) were included in administrator/leadership FTE count only if they were ongoing positions performing special education program support functions in the central office.

The number of positions supporting the special education program at Saugus Union is similar to the average of the seven comparison districts. Saugus had 0.50 FTE fewer administrator/leadership positions and 0.25 FTE fewer administrative support positions.

Recommendation

The district should:

1. Continue to include representatives from the special education staff in activities such as districtwide professional learning, curriculum adoption initiatives, and Local Control and Accountability Plan⁴ (LCAP) development to ensure that the needs of students with disabilities are actively considered in all district planning, evaluation, and decision-making.

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⁴ A three-year plan that describes the goals, actions, services, and expenditures to support positive student outcomes.

Special Education Identification Rate

From 2018-19 through 2023-24, the district's census day enrollment for transitional kindergarten through grade six decreased by 599 students, as shown in Figure 2 below.

Census Day Enrollment of District Students in Transitional Kindergarten through Grade Six, 2018-19 — 2023-24

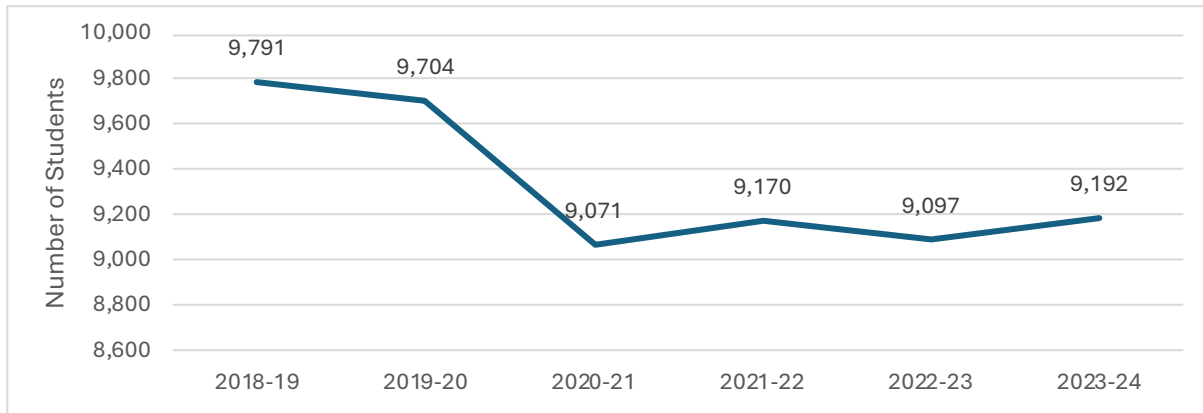


Figure 2. A graph showing the district's census day enrollment for transitional kindergarten through grade six from 2018-19 through 2023-24.

Source: Enrollment by Subgroup for Charter and Non-Charter Schools - Saugus Union School District (CDE).

From 2018-19 through 2023-24, the district's special education enrollment increased by 154 students, as shown in Figure 3 below.

Number of District Students in Transitional Kindergarten through Grade Six Enrolled in Special Education, 2018-19 — 2023-24

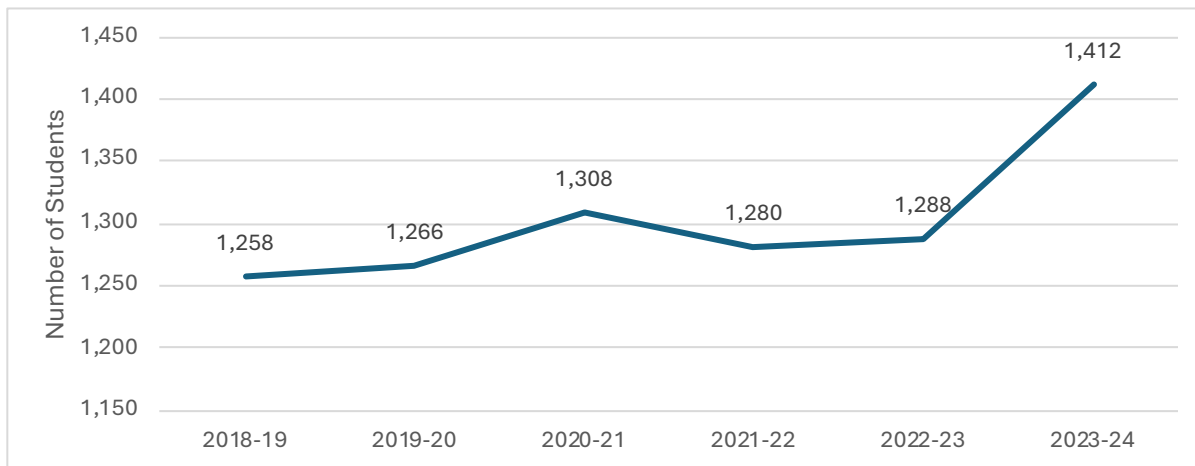


Figure 3. A graph showing the number of district students in transitional kindergarten through grade six enrolled in special education from 2018-19 through 2023-24.

Source: Enrollment by Subgroup for Charter and Non-Charter Schools - Saugus Union School District (CDE).

Despite constituting 51% of the overall student population within the district, students who identify as male account for 67% of those in special education. This percentage mirrors the statewide average of 67%, as calculated from DataQuest. Students who identify as male experience higher identification rates for special education, influenced by factors such as referral bias (in which boys are more likely to be referred due to

poor grades or behavior support needs) and differences in how teachers perceive student behavior (with boys often drawing more negative attention in school). Consequently, it is important for districts to analyze special education referrals rates by identified gender and provide professional development as necessary to address any disparities.

Percentage of Students Enrolled in Special Education

From 2018-19 through 2023-24, the percentage of district students in transitional kindergarten through grade six enrolled in special education increased by 2.51 percentage points, as shown in Figure 4 below.

Percentage of District Students in Transitional Kindergarten through Grade Six Enrolled in Special Education, 2018-19 — 2023-24

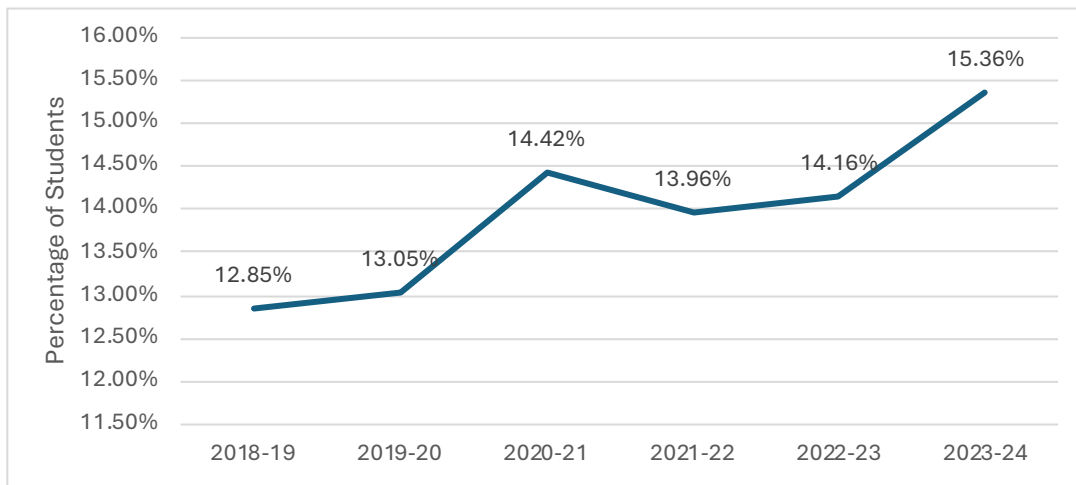


Figure 4. A graph showing the percentage of district students in transitional kindergarten through grade six enrolled in special education from 2018-19 through 2023-24.

Source: Enrollment by Subgroup for Charter and Non-Charter Schools - Saugus Union School District (CDE).

FCMAT calculated the percentage of students enrolled in special education at each of the district's elementary schools, as shown in Figure 5 below. The percentages for schools that have special day classes were computed after reducing the total school enrollment and the school's special education enrollment by the number of students in special day classes. This was necessary because special day class enrollment is not equally distributed across the district's schools.

Percentage of Students Enrolled in Special Education at Each District School, 2023-24

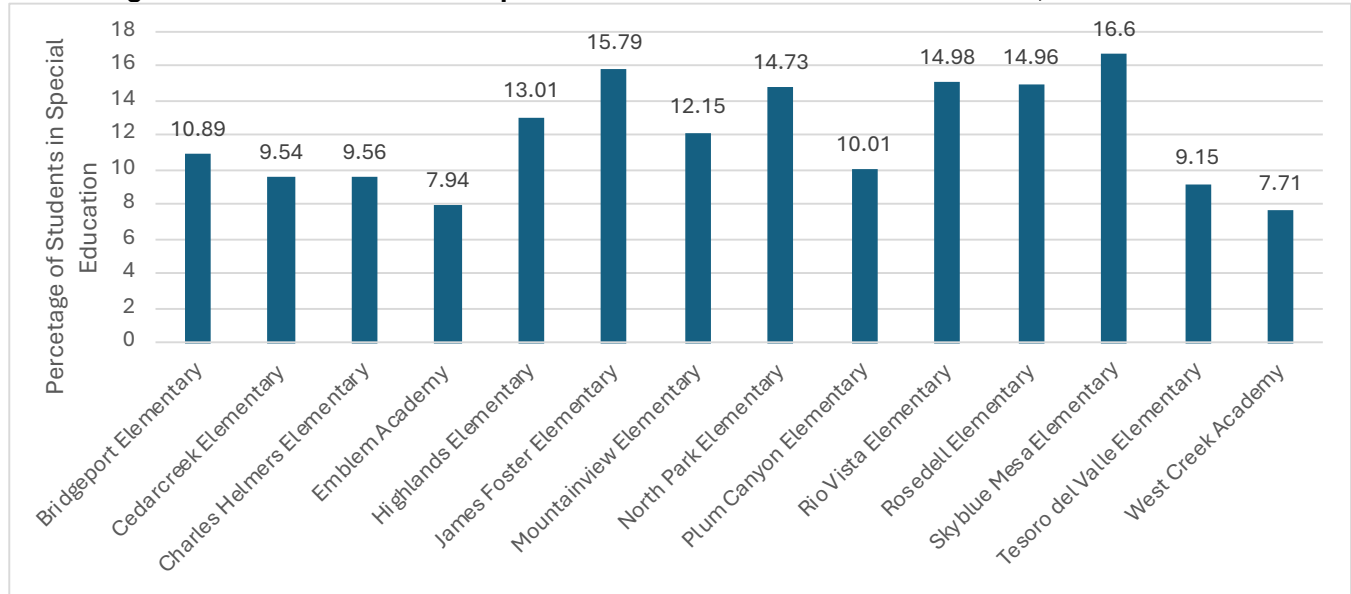


Figure 5. A graph showing the percentage of district students in transitional kindergarten through grade six enrolled in special education at each school in 2023-24.

Source: Enrollment by Subgroup for Charter and Non-Charter Schools - Saugus Union School District (CDE) and district-provided data.

Note: The percentages for schools that have special day classes were computed after reducing the total school enrollment and the school's special education enrollment by the number of students in special day classes.

The percentage of non-SDC students enrolled in special education at certain district schools is more than double that of others. Identifying students for special education even though they do not require it is not a best practice and increases special education costs. As previously stated, students experience less stigma, increased access to rigorous instruction given in general education, and more interactions with their typically developing peers when they are not enrolled in special education. Staff speculated that special education identification rates for students not enrolled in SDCs differ across district schools due to differences in available schoolwide interventions and supports and because of beliefs about the types of accommodations and supports a general education teacher should provide all students. The district needs to investigate these disparate special education identification rates by school using at least the items presented in the “Factors Contributing to the Increasing Percentage of Students in Special Education” section of this report.

FCMAT conducted an analysis of total and special education noncharter school enrollment for transitional kindergarten through grade six for the district, Los Angeles County, and the state, as shown in Table 4 below.

Table 4: Transitional Kindergarten through Grade Six Total and Special Education Enrollment Comparison, 2023-24

2023-24	Saugus Union School District	Los Angeles County	California
Transitional Kindergarten through Grade Six Noncharter Enrollment	9,192	182,865	2,693,528
Transitional Kindergarten through Grade Six Noncharter Special Education Enrollment	1,412	29,427	372,958
Percentage	15.36%	16.09%	13.85%

Sources: Enrollment by Subgroup for Charter and Non-Charter Schools - Saugus Union School District (CDE), Enrollment by Grade - Los Angeles County Report (CDE), Enrollment by Grade – State Report (CDE).

In 2023-24, 15.36% of the district’s students in transitional kindergarten through grade six were identified as requiring special education. This percentage is above the statewide noncharter school average but lower than the Los Angeles County noncharter average for students in transitional kindergarten through grade six.

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 other words, it is the under- or overrepresentation of racial or ethnic groups in special education. The district needs to monitor for disproportionality in special education identification annually and provide training to IEP teams as necessary on how to properly identify students for special education.

Racial and Ethnic Balance of Students in Special Education

The race and ethnicity of students enrolled in the district’s special education program compared to the district’s total student population in 2023-24 was proportionate for most racial and ethnic groups. However, in 2023-24, 45.60% of the district’s special education students identified as Hispanic or Latino, compared to 38.40% of the district’s total student population, and 4.60% of the district’s special education students identified as Asian, compared to 9.60% of the district’s total student population. This is an overrepresentation of students who are Hispanic or Latino and an underrepresentation of students who are Asian in special education, as shown in Figure 6 below.

Percentage of the District's Students in Special Education Compared to the District's Total Student Population by Race and Ethnicity, 2023-24

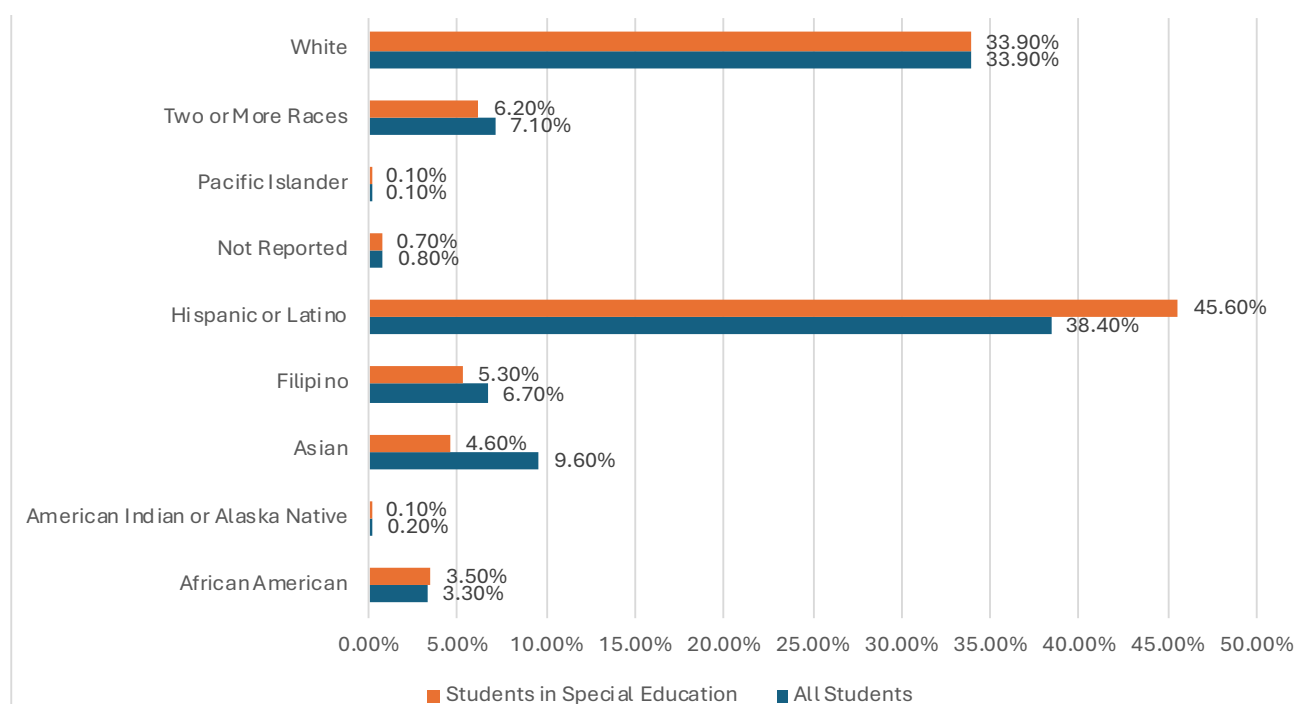


Figure 6. A graph showing the percentage of the district's students in special education compared to the district's total student population by race and ethnicity in 2023-24.

Source: Enrollment by Ethnicity for Charter and Non-Charter Schools in 2023-24 - Saugus Union School District (CDE).

Although the reason for the district's higher-than-expected identification of students who are Hispanic and Latino in special education is unclear, it is imperative that the district identifies only qualifying students with disabilities for special education. This is necessary for at least two reasons. First, even the most efficient special education programs do not receive sufficient funding to support their programs, so it is critical to use these finite resources exclusively for qualifying students with disabilities. Second, while special education services are vital for supporting students with disabilities, those identified for special education may experience stigma, reduced expectations, and less access to the general education curriculum and teachers. These factors can limit their academic achievement and outcomes.

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

In addition, the district needs to investigate its lower-than-expected identification of students who are Asian for special education. The reason behind the district's lower-than-expected identification of students who are Asian is unclear; however, academic literature is informative. In a review of 15 academic studies examining the special education identification of Asian students, Kulkarni (2017) found that most studies reported an underrepresentation of Asian American students in special education. According to Kulkarni (2017), these studies rationalized that this occurs because of factors such as the model minority myth (which stereotypes all Asian Americans as academically successful and hardworking, and ignores the diver-

sity within this group), cultural differences and parental beliefs related to the stigma of disability labels, and lack of proficiency in Asian languages in school districts.

Yet, it is imperative that the district identify all qualifying students with disabilities. This is necessary for at least two reasons. First, public schools are required under the Individuals with Disabilities Education Act (IDEA) to identify, locate, and evaluate all children who are suspected of having a disability. Second, failing to identify a student with a disability for special education can deprive them of their rights 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.

English Learners in Special Education

In 2023-24, 8.02% of all district transitional kindergarten through grade six students were identified as English learners. Of the district's 1,412 transitional kindergarten through grade six students in special education, 160, or 11.33% were identified as English learners, as shown in Figure 7 below.

Percentage of District's English Learners in Special Education Compared to the District's Total Student Population, 2023-24

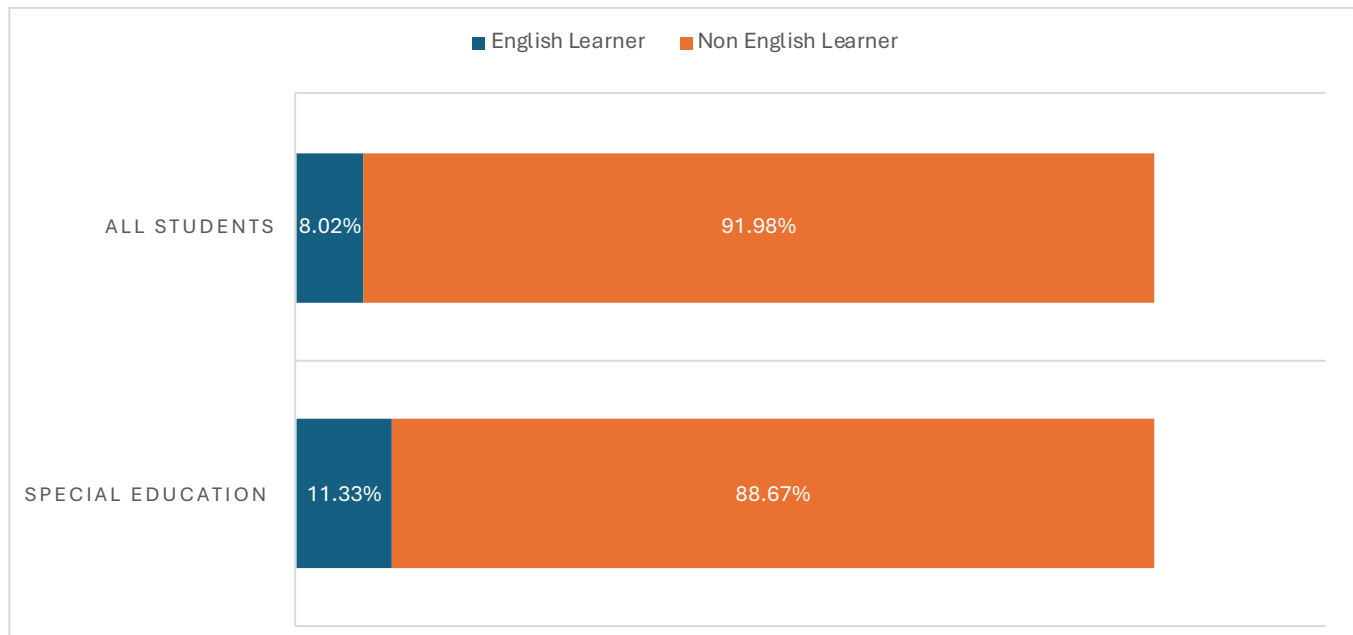


Figure 7. A graph showing the percentage of the district's English learners in special education compared to the district's total student population in 2023-24.

Source: Enrollment by Ethnicity for Charter and Non-Charter Schools in 2023-24 - Saugus Union School District (CDE).

English learners are commonly overidentified for special education, a trend that does not appear to be reflected within the district given that the percentage of English learners in special education compared to the district as a whole is approximately the same. The district needs to review its data to annually to monitor for higher-than-expected identification of English learners in special education.

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 professional development in the proper identification of students for special education, as necessary.
2. Annually monitor the percentage of students who qualify for special education by school site. Provide professional development in the proper identification of students for special education, as necessary.
3. Review its data to determine possible causes of higher-than-expected identification of Hispanic or Latino students in special education. Consider using ACSA's brief, *The Disproportionality of Latinx Students in Special Education*, as a guide.
4. Review its data to determine possible causes of lower-than-expected identification of Asian students in special education.

Factors Contributing to the Increasing Percentage of Students in Special Education

Many staff interviewed explained that the percentage of district students enrolled in special education is increasing because people move to the district as a result of the special education program's positive reputation. However, since the program's reputation has been a factor for many years, and the percentage of the district's students enrolled in special education has increased only in the past few years, it appears to also be influenced by these factors:

- The district's SST process and MTSS.
- Student exit procedures from special education.

These factors are discussed below.

Student Study Teams and MTSS

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. However, failing to identify students with disabilities for special education can deprive them of their rights to a FAPE under the IDEA. This can impede student learning and may obligate a district to pay for compensatory educational services.

Student Study Teams

Education Code 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." Before considering placement in special education, struggling students should be referred to an

SST. This team approach is specifically designed to help students with a wide range of concerns related to their school performance and experience. All districts should have an SST process. The primary purpose of an SST is to provide early intervention and develop a support system for students who face challenges in the general education classroom. SSTs are responsible for reviewing students' strengths and weaknesses, identifying appropriate interventions, setting SMART (specific, measurable, achievable, relevant, and time-based) goals, and monitoring students' progress toward these goals. An SST is composed of the student (if appropriate), the parent or guardian, and various school-based personnel such as counselors, resource specialists, speech pathologists, school psychologists, classroom teachers and administrators.

The district has adopted Board Policy and Regulation 6164.5: Student Success Teams, and has an SST process, which is intended to be used districtwide. However, staff reported that use of this process is inconsistent from school to school. Furthermore, staff members at certain schools described the SST process as a pathway to a special education assessment instead of an opportunity for a student to receive appropriate interventions in response to their differing needs. Many staff explained that certain teachers believe special education is the preferred intervention if a student is not meeting academic standards or behavioral expectations, regardless of whether the student has a disability and is eligible for special education services. Historically, the district did not have a districtwide SST process, which was a deliberate decision intended to grant schools autonomy to develop their own processes and prereferral interventions. However, staff explained that the district has been working to standardize processes such as the SST across district schools so that students at certain schools are not deprived of access to tiered interventions within general education.

Multitiered Systems of Support

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

Response to Instruction and Intervention (RtI²)

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 RtI² to indicate a general education approach of high-quality, culturally responsive differentiated instruction and early intervention, prevention, and behavioral strategies. RtI² uses universal screening and data analysis of all students' learning progress in the general education classroom. A comprehensive districtwide RtI² system not only prevents the inappropriate identification of students for special education but also ensures the delivery of services within students' LREs. An RtI² system should define the following for tiers 1 and 2:

- Type of intervention (e.g., literacy, mathematics, positive behavior supports).
- Who will be 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 adopted Board Policy 6120: Response to Instruction and Intervention, which is aligned with CDE's definition of RtI². Staff reported that the district did not have a districtwide MTSS with defined tiered interventions until recently. Similarly to the district's SST process, this lack of standardization was intended to give schools autonomy to creatively address student needs. However, because the district was not using formalized standard, tiered academic, behavioral, and social-emotional prereferral supports and interventions districtwide, certain students may have lacked access to intervention and support opportunities in the general education program, which can reduce the need for identification for special education services.

Staff explained that since the return to school following the COVID-19 pandemic, they have been working to standardize the supports and interventions offered across district schools. The district has made significant progress in this area by adopting districtwide focus areas, initiatives and curriculum, and by offering districtwide professional development. Despite districtwide directives and expectations for MTSS, most staff reported that continued work is needed to ensure tiered interventions are consistently provided across and within schools.

The district has been contracting with the Los Angeles County Office of Education to provide PBIS training for district leaders and school PBIS teams. District schools are in different parts of the PBIS scope and training sequence. Staff reported that parts of the PBIS program are being implemented at all district schools and that it supports positive student behavior at schools where staff view the program positively and implement it strictly. Staff reported that staff turnover has affected PBIS implementation at certain schools since the school's PBIS team being trained and leading the implementation of PBIS at their school has been inconsistent. In addition, the district has adopted social-emotional learning curriculum which was reported to be used across district schools.

Student Exit Procedures

Not all students require special education services throughout their school years. Special education should be reserved for students who are eligible to receive these specialized services. To be eligible for special education, a student must qualify by meeting the two-pronged test, which requires that they:

- Meet the definition of one of the 14 disability categories in the IDEA.
- Require specially designed instruction.

Students may exit special education at their annual or three-year (triennial) IEP meeting when they have demonstrated an ability to succeed in general education, or no longer meet the definition of one of the

IDEA's disability categories, and/or have acquired the skills they previously lacked, such as using intelligible speech or language skills. A student's IEP team makes the recommendation regarding the student's continued need for special education.

Many district staff indicated that students are not being exited from special education according to the two-pronged test at their triennial IEP meeting if they no longer qualify for special education, and some staff indicated they never exit a student from special education. Staff reported parent pressure for the student to remain in special education as the largest factor. In addition, many staff reported that part of the district's culture is to keep a student in special education if they are making educational progress because the program is viewed as effective. However, keeping students in special education even though they do not require it is not a best practice. Students experience less stigma, increased access to rigorous instruction given in general education, and more interactions with their typically developing peers when they are not enrolled in special education. A student's exit from special education is evidence of the student's and the program's success.

The following two strategies could help the district evaluate its exit procedures for students in special education.

1. Review psychoeducational and speech and language assessments to identify those in which students could have been exited from special education. From those assessments, select several for which students were exited from special education and several for which students were not exited. Then, redact any student, staff or school identifying information on the assessment and have an attorney or expert witness (school psychologist or speech and language therapist) use the redacted documents as they provide professional development on exit criteria and best practices for special education staff and district staff who serve as the administrative designee at IEP meetings.
2. Conduct a more detailed analysis of its student exit rates from special education at least by school, grade level, and disability. Consider using the 2020 Policy Analysis for California Education (PACE) brief, Students with Disabilities in the CORE Districts, as a guide. This brief describes key characteristics and outcomes of students with disabilities as well as how they transition in and out of special education. PACE leveraged data from the CORE districts (Fresno, Garden Grove, Long Beach, Los Angeles, Oakland, Sacramento, San Francisco, and Santa Ana) and determined that, "Exit rates between grades remain relatively constant from kindergarten through fourth grade, where about 25 percent of students who had an IEP in the prior year exited special education."

In contrast to the 2020 PACE brief findings, most staff reported that district students are seldom exited from special education. The district needs to analyze its special education exit data at least by school, grade level and disability category to determine if staff reports regarding exit rates are accurate. It may be helpful to collaborate with the CORE districts studied in the 2020 PACE brief to determine how they provide training for and monitoring of exit procedures from special education. Individuals from the CORE districts may also be able to provide knowledge and insights to help district staff view and approach the exit process differently.

Recommendations

The district should:

1. Set an expectation that all schools use the district's SST process, and proactively monitor, support, and require its consistent use.

2. Continue its work to define and provide training on its MTSS to address students' academic, behavioral, and social-emotional needs.
3. Continue its work to provide training and support for schools in PBIS.
4. Provide professional development on proper student exit procedures from special education for special education staff and other staff who serve as the administrative designee at IEP meetings.
5. Analyze its special education entry and exit data at least by school, grade level, and disability category to identify trends, and provide professional development, as necessary.
6. Monitor special education exit rates by school, grade level and disability category annually, and provide professional development, as necessary.

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Continuum of Service Options for Students in Special Education

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 ensures the availability of a FAPE for any child with a disability in need of 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)]).

District Continuum of Services

FCMAT analyzed the district's special education continuum of services and its alignment with the principles outlined in the 2015 report on One System.

Preschool Continuum of Services

The district has a preschool assessment team that facilitates the required assessments for students transitioning from the North Los Angeles County Regional Center to the district. The team also evaluates other preschool-age children who are suspected of having a disability to determine their eligibility for special education. Following assessment, qualifying students receive school-based specialized academic instruction, and/or related services, such as speech and language therapy, adapted physical education (APE), and occupational therapy (OT) as necessary.

Most preschool students who qualify for special education receive specialized academic instruction in one of the district's self-contained SDC programs, which include:

- **RISE Special Day Classes** – These classes support students with disabilities who have mild support needs and goals in areas such as speech and language.
- **Noncategorical Special Day Classes** – These classes serve students with a variety of disabilities and support needs.
- **Regional Autism Program (RAP) Special Day Classes** – The district provides the RAP for students with autism throughout the SELPA.

In addition, the district recently opened two collaborative preschool classes that are taught by a general education teacher and a special education teacher and include students with disabilities and students who are typically developing. This expansion of inclusive opportunities for preschool-age students with disabilities is a best practice and should be continued because it is strongly aligned with the 2015 report on One System's recommendations.

School-age Continuum of Services

The district provides specialized academic instruction and related services in accordance with students' IEPs in either a general education classroom or in a separate setting through a variety of district programs.

Programs supporting students in special education who are working to meet general education standards include the following:

- **Resource Specialist Program** – Staff adapt the content, method and instructional delivery to facilitate access for students with mild-to-moderate support needs to general education curricula and settings. Staff reported teachers in this program provide most of the specialized academic instruction in small groups outside of the general education classroom.
- **Inclusion Program** – Similarly to the resource specialist program, staff adapt the content, methodology and instructional delivery to facilitate access for students with mild-to-moderate support needs to general education curricula and settings. However, staff reported teachers in this program provide most of the specialized academic instruction in the general education classroom setting through co-teaching or push-in support. This is a best practice and needs to be continued because it is strongly aligned with the 2015 report on One System’s recommendations. Co-teaching is a collaborative teaching approach offering targeted support for students with disabilities within inclusive general education settings instead of in separate classes taught by a special education teacher. Push-in support is where a special education teacher provides 1-to-1 or small group instruction in a general education classroom.
- **Special Day Classes for Students with Mild-to-Moderate Support Needs** – Special education teachers adapt the content, method, and instructional delivery in this program to provide access to general education curricula in a self-contained classroom. Staff reports that students may be mainstreamed into general education settings for certain grade level activities such as art, music, physical education, academic subjects or lunch based on their skills and needs.
- **Building Academic and Social Emotional Success (BASES)** – Staff facilitate social-emotional and behavior management support systems so students may access general education curricula in a self-contained classroom setting.

The district also offers programs using a modified curriculum for students with extensive support needs, which include:

- **Special Day Classes for Students with Extensive Support Needs** – This highly individualized program is based on a modified curriculum emphasizing communication, mobility, life skills, and specialized health care.
- **Regional Autism Program (RAP) Special Day Classes** - The district provides the RAP for students with autism throughout the SELPA.

Placement in the Least Restrictive Environment

The IDEA requires that students with disabilities be offered a FAPE and 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 assessment of LRE placement is conducted through the CDE’s local level annual performance report. These reports, required by the IDEA, evaluate districts on 14 indicators for which the target is “met” or “not met.”

School-age Students

In 2022-23, the district met two of the three targets for indicator 5, which assesses the placement of school-age students in the LRE, as shown in Table 5 below.

Table 5: District's 2022-23 Performance on Indicator 5 — School-age Students in the Least Restrictive Environment

Indicator	Indicator	Rate	Target	Target Met?
5a	LRE Rate: In Regular Class More than 80%	70.69%	≥62.00%	Yes
5b	LRE Rate: In Regular Class Less than 40%	23.59%	<16.50%	No
5c	LRE Rate: Separate Schools	0.39%	<3.00%	Yes

Source: Local Level Annual Performance Report 2022-23 (CDE) (most recent report).

The district met the target for LRE indicator 5a. This is significant since studies such as the one performed by Cole and colleagues (2021) have demonstrated that students with disabilities who spent 80 percent or more of their time in general education settings performed significantly better in reading and mathematics assessments than their comparable peers who spent more time in special education settings (Cole et al., 2021). In addition, Oh-Young and Filler (2015) found that students with disabilities in general education settings outperformed those with disabilities in less-integrated settings on academic and social-emotional measures.

To increase student access to general education settings, many districts across the state have reduced the number of SDCs for students with mild-to-moderate support needs such as learning disabilities. The district did not meet LRE indicator 5b because it has not significantly reduced the number of its SDCs for students with these needs. However, some progress was made when the district started its inclusion program in 2023-24 with one teacher who supported students with mild-to-moderate support needs in general education settings who otherwise would have been served in an SDC. The district's inclusion program emphasizes serving students in their LRE and is strongly aligned with the recommendations in the 2015 report on One System. In 2024-25, the inclusion program grew to two teachers, and this trend needs to continue so that the district can increase access for students with mild-to-moderate disabilities, such as learning disabilities, to general education settings. If not, the district will continue to struggle to meet LRE indicator 5b and may hinder the performance and outcomes of students with mild-to-moderate support needs.

Many districts have improved their performance on LRE indicator 5b by reducing enrollment in mild-to-moderate SDCs and supporting those students in general education settings through a co-teaching program. This strategy is aligned with evidence-based practices, and empirical research demonstrates co-teaching approaches can benefit both teachers and students with disabilities. For example, Lehane and Senior (2019) concluded that co-teaching is an effective mode of instruction in a general education setting to meet the needs of students with disabilities and typically developing students in the primary grades. They found that students with disabilities and typically developing students in the primary grades achieved statistically significant increases in numeracy skills on standardized assessments following seven months of co-taught mathematics instruction. Scruggs and colleagues (2007) found special education teachers engaged in collaborative teaching, increased their knowledge of course content and classroom management strategies, and improved in their ability to adapt the curriculum to meet the needs of diverse learners, while general education teachers reported collaborative teaching contributed positively to their professional development.

Staff reported that most co-teaching in the district is performed by the two inclusion program teachers and is an instructional model rarely used by resource specialists at district schools. The broader adoption of co-teaching may be hindered by a lack of training across the district, which is discussed in the Professional Development Plan section of this report.

Additionally, staff reported that certain district educators believe students with disabilities enrolled in SDCs for students with mild-to-moderate support needs are best served in these programs. However, this belief contradicts empirical research (Cole et al., 2021 and Oh-Young and Filler 2015) and the findings in the 2015

report on One System, which explains that the performance and outcomes of students with disabilities improve with increased access to general education settings. According to Cathy Pratt (1997):

...inclusion is a belief that ALL students, regardless of labels, should be members of the general education community. As members of the general education community, students with and without disabilities should have access to the full range of curriculum options. This means, for example, that students without disabilities should be able to utilize resource rooms without receiving a label first. It also means that students with disabilities should have access to typical homerooms, general education classrooms and courses, and school clubs. Those who support inclusion acknowledge that students have diverse learning needs and that the traditional model of education increasingly is not able to accommodate all students. The philosophy of inclusion encourages the elimination of the dual special and general education systems, and the creation of a merged system that is responsive to the realities of the student population.

While some district staff interviewed expressed views that agreed with this definition of inclusion, many did not. For example, many staff interviewed described special education services as a separate place where students with disabilities can go to receive instruction instead of a support within the general education program. Therefore, training addressing inclusion, which is discussed in the “[Professional Development Plan](#)” section of this report, may be beneficial.

Preschool Students

In 2022-23, the district did not meet the targets for indicator 6, which assesses the placement of preschool-age students in the LRE, as shown in Table 6.

Table 6: District’s 2022-23 Performance on Indicator 6 — Preschool-age Students in the Least Restrictive Environment

Indicator	Indicator	Rate	Target	Target Met?
6a	Preschool LRE: Regular Program	12.27%	≥43.00%	No
6b	Preschool LRE: Separate Class	68.10%	<29.00%	No
6c	Preschool LRE: Home	4.29%	<3.50%	No

Source: Local Level Annual Performance Report 2022-23 (CDE) (most recent report).

The district did not meet any of the preschool-age LRE indicators in 2022-23. To increase access for preschool-age students with disabilities to general education settings, many districts across the state have opened integrated preschool classes for students with disabilities and typically developing students. The district’s collaborative preschool classes are an example of this and are aligned with best practice and the 2015 report on One System’s recommendations. The district needs to evaluate its RISE preschool classes to determine whether the IEP goals for students in those programs could be met in collaborative preschool classes. If collaborative preschool classes would meet the needs of students traditionally enrolled in RISE preschool classes, the district could consider transitioning the RISE preschool classes into collaborative preschool classes. Doing so would help the district progress towards meeting preschool-age LRE indicators.

District Continuum of Services in the Least Restrictive Environment

Overall, the district offers a full continuum of special education options and services and has begun shifting its service delivery model to improve access for students with disabilities to general education settings. However, the district did not meet four of six targets measuring LRE in its most recent local level annual performance report. This indicates that the district's continuum of service options for students with disabilities overly restricts student access to general education settings and interactions with neurotypical peers. 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 continue to prioritize the LRE and better support its continuum of service options that facilitate access to general education settings for students with disabilities. To do so, the district needs to provide professional development in inclusive practices as described in the "[Professional Development Plan](#)" section of this report.

Recommendations

The district should:

1. Continue to monitor the percentage of the school day that students with IEPs are educated in general education settings, with a focus on meeting or exceeding LRE targets in the local level annual performance report.
2. Develop a plan to offer more inclusive opportunities for school-age students with disabilities in general education settings and reduce the enrollment of students with mild-to-moderate support needs, such as learning disabilities, in SDCs.
3. Evaluate its RISE preschool classes to determine whether the IEP goals for students in those programs could be met in collaborative preschool classes. If so, consider transitioning the RISE preschool classes into collaborative preschool classes.

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. The district has been providing training in MTSS but has only offered optional training addressing UDL. Mostly special education teachers and few general education teachers or other staff were reported to have attended the UDL training. Training recommendations related to UDL, and other areas of need, are outlined below.

Supporting Inclusive Practices

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 learn-

ing. 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 that 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 the designing of lesson plans by general education teachers.

Prior to providing training in UDL, a best practice is to address the critical changes in thinking required to achieve a more inclusive education system for students with disabilities. During interviews, many staff reported that not all educators within the district believe that students with disabilities are general education students first. Staff need to understand that they all share the responsibility to support the success of every student.

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 moderate-to-severe service needs, are best served in SDCs rather than general education settings. To foster a more inclusive educational environment, the district needs to offer training in inclusive practices. This will help 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.

Training for Co-Teaching

As mentioned in the “Placement in the Least Restrictive Environment” section of this report, co-teaching is an instructional model used by the two inclusion program teachers and supported by empirical research, but rarely used by district resource specialists. Instead, most district resource specialists use a pull-out model in which students leave their general education class for part of the school day to receive instruction in a separate class using curriculum that may not be standards-based. The broader adoption of co-teaching may be hindered by a lack of training. To enable more students to access general education settings through co-teaching, the district's general education and special education teachers need to receive training on at least the different co-teaching models and how to co-plan and co-teach.

Training Addressing Student Exit Procedures

As mentioned in the “Student Exit Procedures” section of this report, many staff reported students are not exited from special education if they no longer qualify according to the two-pronged test. In addition to providing training addressing the special education eligibility determination process, the district would benefit from having the special education staff and district staff who serve as the administrative designee at IEP meetings review recent psychoeducational and speech and language assessment reports in which students were and were not properly exited from special education. The district could redact any student, staff or school identifying information on the assessment reports and have an attorney or expert witness (school psychologist or speech and language therapist) use the redacted documents as they provide professional development on the criteria and student exit procedures from special education.

Training for Administrative Designees

California Education Code 56341(b)(4) requires attendance at IEP meetings by an LEA representative who is qualified to provide or supervise the provision of specialized instruction and is knowledgeable about the general education curriculum and the LEA's resources. This IEP team member is commonly called the

administrative designee. Staff reported that site administrators and student support services administrators serve as administrative designees for IEP meetings. Staff indicated site administrators have received administrative designee training but need additional support in how to lead difficult conversations, in alternative dispute resolution tactics, and in understanding what makes the written IEP and the process to develop it legally defensible. In addition, as described in the “[Student Exit Procedures](#)” section of this report, administrative designees need training on student exit procedures from special education. Accordingly, staff who serve as administrative designees at IEP meetings should receive annual training in at least the following:

- Roles and responsibilities of IEP team members.
- Eligibility determination process for special education, and when to exit a student from special education.
- Components of a procedurally compliant IEP and IEP meeting.
- IEP development process for provision of FAPE in the LRE.
- Adding supports and services based on student needs as measured by assessment results.
- Common reasons for conflict at IEP meetings and strategies to reduce conflict.
- How to respond to unexpected requests during IEP meetings.
- How to follow up if a parent or guardian does not consent to the IEP.

Training for Special Education Paraeducators

The best practice is for special education paraeducators to receive regular training in how to work with students with disabilities and stay up to date with research-supported, evidence-based practices. Staff reported that special education paraeducators participate in mandated training, and some receive additional formal training on topics such as nonviolent crisis intervention. However, most staff interviewed indicated that the district’s special education paraeducators have unmet training needs in critical areas such as:

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

This training gap is exacerbated by staff turnover. A lack of training may result in less effective support for students and may create liabilities for the district.

Recommendations

The district should:

1. Provide training in inclusive practices to foster a mindset that students with disabilities can be successfully included in general education settings.
2. Use the 2015 report on One System as a guide for professional development planning that prioritizes UDL and MTSS and encourages positive student outcomes for all students.

3. Provide co-teaching training for the district's general education and special education teachers so that more students in special education can receive support from their special education teacher in a general education setting with access to the general education curriculum and typically developing peers.
4. Provide annual training to district staff who act as administrative designees at IEP meetings, with an emphasis on proper exit procedures from special education, how to facilitate difficult conversations, and how to ensure a written IEP and the process to develop it are legally defensible.
5. Develop a plan to facilitate better access for special education paraeducators to professional development in areas such as disability awareness, positive behavior supports, deescalation strategies, implementing accommodations and modifications, and differentiation strategies.

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Special Education Teacher Staffing

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

Resource Specialist Program Staffing

Education Code 56362(c) specifies a statewide guideline for RSP staffing and 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.

Concurrently, the district's Regulation 4112.23: Special Education Staff states:

No resource specialist shall have a caseload which exceeds 28 students. As necessary and with the agreement of the resource specialist, the Board of Trustees may request a waiver from the State Board of Education to increase the caseload to no more than 32 students, provided that an individual resource specialist does not have a caseload exceeding 28 students for more than two school years and has the assistance of an instructional aide at least five hours daily during the period of the waiver (Education Code 56362, 56362.1; 5 CCR 3100).

In 2023-24, the district had 22.0 FTE resource specialists supporting students with mild-to-moderate service needs. Based on caseload estimates provided by the district, these teachers managed the cases of 638 students, averaging 29.0 students per teacher, as shown in Table 7 below.

Table 7: Resource Specialist Teacher Staffing, 2023-24

School Level	Total Teacher FTE	Total Student Caseload	Average Teacher Caseload	Staffing Above (+) or Below (-) Education Code Standard
Elementary	22.0	638	29.0	-0.79

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

At the end of 2023-24, districtwide resource specialist teacher staffing was 0.79 FTE below what is required to meet the EC 56362(c) standard. The district needs to review resource specialist caseload projections and student needs for 2024-25 to determine if it needs to increase the number of resource specialists to meet the EC 56362(c) standard.

Industry-Standard Class Size by Special Day Class Program

The district operates self-contained noncategorical SDCs for students with disabilities in preschool and elementary school. The district also operates specialized, regional SDCs that support students with autism from districts in the SELPA.

Neither the district's contract with the Saugus Teachers Association nor the Education Code specify maximum caseloads or class size for SDC teachers, but industry standard class sizes are shown in Table 8 below. The district reported it uses these industry standard class size ranges to determine staffing for its SDC programs.

Table 8: Special Day Class Industry Standard Class Size

School Level	SDC Support Level	SDC Focus	Industry-Standard Class Size Range
Preschool	Mild-to-Moderate Support Needs	Noncategorical	14 students per teacher
Preschool	Extensive Support Needs	Noncategorical	10 students per teacher
Preschool	All	Autism	9 students per teacher
School age	Mild-to-Moderate Support Needs	Noncategorical	12-15 students per teacher
School age	Extensive Support Needs	Noncategorical	10-12 students per teacher
School age	All	Autism	8-10 students per teacher
School age	All	Emotional Disability	8-10 students per teacher

Sources: Industry standards.

Note: Preschool teachers often lead a morning and an afternoon class for two different groups of students.

Preschool SDC Teacher Staffing

In 2023-24, the district had 10.0 FTE SDC preschool teachers, as shown in Table 9 below. All the district's preschool teachers conduct a morning and an afternoon class for two different groups of students except for the three leading SDCs for students with autism and the one who leads a noncategorical morning SDC and serves as an administrative designee in the afternoon.

Two of the preschool teachers support students in an inclusive collaborative preschool class, which is co-taught in the mornings by both a general education and special education teacher.

Table 9: Preschool Special Day Class Teacher Staffing, 2023-24

School Level	SDC Focus	Total Number of Teachers Assigned Per Session	Total Student Caseload	Teacher Class Size Average Per Session	Industry-Standard Class Size Range
Preschool Morning Session	Noncategorical	7.0	101	14.43	10-14 students per teacher
Preschool Afternoon Session	Noncategorical	6.0	61	10.17	10-14 students per teacher
Preschool	Autism	3.0	28	9.33	9 students per teacher

Sources: District-provided data and industry standards.

Note: The district's preschool SDC classes, except for those supporting students with autism, are noncategorical. Hence, a ratio of 1 teacher to 10-14 students was applied, which incorporates the industry standard ratios of 1-to-14 for students with mild-to-moderate support needs and 1-to-10 for those with extensive needs.

In 2023-24, the districtwide preschool noncategorical SDC average class sizes of 14.43 students per teacher in the morning session and 10.17 students per teacher in the afternoon session were aligned with the industry-standard range. The districtwide preschool RAP class size average of 9.33 students per teacher was aligned with the industry standard.

School-age Mild-to-Moderate Support Needs SDC Teacher Staffing

In 2023-24, the district had 15.0 FTE mild-to-moderate SDC teachers who led noncategorical classes as shown in Table 10 below. The district also had a 1.0 FTE teacher who had previously taught a mild-to-moderate SDC, piloted the inclusion program in 2023-24, and was not included in the staffing analysis below. Based on caseload estimates provided by the district, these 15.0 FTE teachers managed the cases of 200 students, averaging 13.33 students per teacher.

Table 10: Mild-to-Moderate Special Day Class Teacher Staffing, 2023-24

School Level	SDC Focus	Total Teacher FTE	Total Student Caseload	Teacher Caseload Average	Industry-Standard Caseload Range
Elementary	Noncategorical	15.0	200	13.33	12-15 students per teacher

Sources: District-provided data and industry standards.

Note: In 2023-24, the district also had a 1.0 FTE teacher who had previously taught a mild-to-moderate SDC but piloted the inclusion program and was not included in the staffing analysis.

In 2023-24, the districtwide mild-to-moderate support need noncategorical SDC caseload average of 13.33 students per SDC teacher was aligned with the industry-standard range.

School-age Social Emotional Support Needs SDC Teacher Staffing

In 2023-24, the district had 3.0 FTE teachers who led classes for students with social emotional support needs in the BASES program as shown in Table 11 below. Based on caseload estimates provided by the district, these 3.0 FTE teachers managed the cases of 14 students, averaging 4.67 students per teacher.

Table 11: Social Emotional Support Needs Special Day Class Teacher Staffing, 2023-24

School Level	SDC Focus	Total Teacher FTE	Total Student Caseload	Teacher Caseload Average	Industry-Standard Caseload Range
Elementary	Emotional Disability	3.0	14	4.67	8-10 students per teacher

Sources: District-provided data and industry standards.

In 2023-24, the district's BASES program was staffed at 1.25 FTE above the 1-to-8 student-to-teacher ratio and 1.60 FTE above the 1-to-10 student-to-teacher ratio. Staff reported a lower student-to-teacher ratio was necessary in 2023-24 due to the support needs of students in the BASES program, and that in 2024-25, the district reduced by a 1.0 FTE BASES teacher.

School-age Regional Autism Program SDC Teacher Staffing

In 2023-24, the district had 7.0 FTE teachers who led classes in the RAP as shown in Table 12 below. Based on caseload estimates provided by the district, these 7.0 FTE teachers managed the cases of 77 students, averaging 11.00 students per teacher.

Table 12: Regional Autism Program Special Day Class Teacher Staffing, 2023-24

School Level	SDC Focus	Total Teacher FTE	Total Student Caseload	Teacher Caseload Average	Industry-Standard Caseload Range
Elementary	Autism	7.0	77	11.00	8-10 students per teacher

Sources: District-provided data and industry standards.

In 2023-24, the district's school-age RAP staffing was 2.63 FTE below the 1-to-8 student-to-teacher ratio and 0.70 FTE below the 1-to-10 student-to-teacher ratio. Factors such as increased special education enrollment and higher student support needs following the COVID-19 pandemic have contributed to RAP caseload averages that are higher than industry standard. High caseloads can prevent teachers from providing students with adequate supervision and support. Therefore, the district would benefit from reviewing RAP teacher caseloads and student needs to determine if staffing adjustments to align with industry standards would allow it to provide better service to students.

School-age Extensive Support Needs SDC Teacher Staffing

In 2023-24, the district had 5.0 FTE SDC teachers who led noncategorical classes for students with extensive support needs as shown in Table 13 below. Based on caseload estimates provided by the district, these 5.0 FTE teachers managed the cases of 50 students, averaging 10.00 students per teacher.

Table 13: Extensive Support Needs Special Day Class Teacher Staffing, 2023-24

School Level	SDC Focus	Total Teacher FTE	Total Student Caseload	Teacher Caseload Average	Industry-Standard Caseload Range
Elementary	Noncategorical	5.0	50	10	10-12 students per teacher

Sources: District-provided data and industry standards.

In 2023-24, the districtwide extensive support needs noncategorical SDC caseload average of 10.00 students per SDC teacher was aligned with the industry-standard range.

Recommendations

The district should:

1. Review resource specialist caseload projections and student needs for 2024-25 to determine if it needs to increase the number of resource specialists to meet the EC 56362(c) standard.
2. Review school-age RAP teacher caseloads and student needs for 2024-25 to determine if increasing its staffing to align with industry standards would allow it to provide better service to students.
3. Continue to annually review caseload projections for special education teachers and assess student needs to determine if teacher staffing adjustments are necessary for any of its programs.

Paraeducator Staffing

Special education paraeducators, also known as special education aides or instructional assistants, are trained professionals who work with students, typically under the direction of a classroom teacher. School districts often employ special education paraeducators 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 special circumstance instructional assistance (SCIA).

The district employs special education paraeducators for preschool and school age programs under three job descriptions. The distinguishing characteristics of each position are outlined below.

- **Special Education Paraeducator:** The district's job description states that this position provides:

Support to the instructional program within an assigned classroom with specific responsibility for assisting in the supervision, care, and instruction of special needs students with behavior challenges one-on-one, in the regular classroom, or in a self-contained classroom; assisting in implementing plans for instruction; monitoring student behavior during non-classroom time; and providing information to appropriate school personnel.
- **Special Education Paraeducator (Behavioral Management):** The district's job description states that this position provides:

Support to the instructional program under the general supervision of a Board Certified Behavior Analyst and/or School Psychologist, supporting the coordination of a school behavior program designed to support students (in general and special education) who exhibit the most challenging behaviors to develop prosocial behaviors and coping skills; serving as a coach to school personnel regarding behavior interventions; assisting in the development and implementation of behavior intervention plans/services for eligible students; collaborating with school-site leadership to evaluate the effectiveness of the program and making needed adjustments.
- **Speech and Language Pathologist Assistant:** The district's job description states that this position provides:

Speech and language services and appropriate intervention services to eligible students under the direction of a Speech Language Pathologist; and maintaining speech and language special education records and documentation as directed by a Speech Language Pathologist.

Resource Specialist Program Paraeducator Staffing

Education Code 56362(6)(f) states, "At least 80% of the resource specialists within a local plan shall be provided with an instructional aide." In 2023-24, the district had 22.0 FTE resource specialist teachers and 23 special education paraeducators assigned to the RSP. Thus, in 2023-24, all resource specialists could have been provided with a special education paraeducator.

Special Day Class Program Paraeducator Staffing

The industry standard base staffing for SDCs is to assign one paraeducator for every teacher supporting students with mild-to-moderate and extensive support needs. For SDCs supporting students with autism, the standard is two paraeducators for every teacher. Additionally, the industry standard for staffing beyond the SDC base staffing level is determined by an adult-to-student ratio, as shown in Table 14 below.

Table 14: Industry Standard Paraeducator Staffing and Adult-to-Student Ratios

SDC Support Level	SDC Focus	Industry Standard Special Education Paraeducator Staffing	Adult-to-Student Ratio
Mild-to-Moderate	Noncategorical	1-2 six-hour special education paraeducators depending on a class size of 12-15	1-to-7
Extensive	Noncategorical	1-2 six-hour special education paraeducators depending on a class size of 10-12	1-to-5
All	Autism	2-4 six-hour special education paraeducators depending on a class size of 8-10	1-to-3

Source: Industry standards.

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

District SDC Program Paraeducator Staffing

The district has established paraeducator staffing guidelines, referred to as building blocks, for its SDC programs, most of which match the industry standards. The district reported that when it assigns a 1-to-1 paraeducator to a student in an SDC, it assesses whether it can reduce the number of classroom paraeducators assigned and still meet student needs. The district's use of paraeducator staffing building blocks is a positive practice; however, because the district does not use an adult-to-student staffing ratio to determine paraeducator staffing (except at the preschool level), it may be over- or understaffed as a result. Assigning more paraeducator support than necessary is costly and may limit the opportunities of students with disabilities to gain independence; however, not assigning enough paraeducators to an SDC can mean that students lack appropriate support and supervision. Therefore, the district would benefit from adding an adult-to-student ratio to its paraeducator staffing building blocks for SDCs. When using an adult-to-student ratio to determine paraeducator staffing, the teacher is included as an adult, and any students who have a 1-to-1 paraeducator and their assigned 1-to-1 paraeducator need to be removed from the ratio.

FCMAT validated that in 2023-24, the district reduced the number of classroom paraeducators assigned to several SDCs that had multiple 1-to-1 paraeducators. Overall, in 2023-24 the district's SDC paraeducator staffing was aligned with the industry standards. If the district had allocated special education paraeducators to its SDC programs in 2023-24 using the industry standard adult-to-student ratios, it may have been able to reduce SDC paraeducators by 2.0 FTE as shown in Table 15 below.

Table 15: SDC Paraeducator Allocation – District Compared to Industry Standards, 2023-24

School and SDCs	SDC Enrollment	SDC Enrollment Less 1-to-1 Para-educators	No. of Special Education Classroom Support Para-educators	Adult to Student Ratio (Teacher and Classroom Support Paraeducator(s) to Students)	Industry Standard Adult to Student Ratio (Teacher and Classroom Support Paraeducator(s) to Students)	Classroom Support Paraeducator Staffing Above (+) or Below (-) Industry Standard
Bridgeport RAP SDC TK-1 st	12	10	3	4-to-10 or 0.40	1-to-3 or 0.33	Almost Equal to Industry Standard
Bridgeport RAP SDC 2 nd -4 th	10	7	1	2-to-7 or 0.29	1-to-3 or 0.33	Almost Equal to Industry Standard
Bridgeport RAP SDC 4 th -6 th	12	8	1	2-to-8 or 0.25	1-to-3 or 0.33	Almost Equal to Industry Standard
Emblem Academy RAP SDC TK-1 st	11	10	3	4-to-10 or 0.40	1-to-3 or 0.33	Almost Equal to Industry Standard
Emblem Academy RAP SDC 1 st -2 nd	11	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Almost Equal to Industry Standard
Emblem Academy RAP SDC 2 nd -3 rd	12	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Almost Equal to Industry Standard
Emblem Academy RAP SDC 3 rd -6 th	10	8	1	2-to-8 or 0.25	1-to-3 or 0.33	Almost Equal to Industry Standard
Charles Helmers M/M SDC TK-1 st	15	14	2	3-to-14 or 0.21	1-to-7 or 0.14	Almost Equal to Industry Standard
Charles Helmers M/M SDC 2 nd -4 th	8	7	1	2-to-7 or 0.29	1-to-7 or 0.14	+1.0 FTE Above Industry Standard
Charles Helmers M/M SDC 4 th -6 th	14	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Almost Equal to Industry Standard
Highlands M/M SDC TK-1 st	15	14	2	3-to-14 or 0.21	1-to-7 or 0.14	Almost Equal to Industry Standard
Highlands M/M SDC 1 st -3 rd	15	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Almost Equal to Industry Standard
Highlands M/M SDC 4 th -6 th	15	14	1	2-to-14 or 0.14	1-to-7 or 0.14	At Industry Standard
Mountainview M/S SDC TK-K	10	9	1	2-to-9 or 0.22	1-to-5 or 0.2	Almost Equal to Industry Standard
Mountainview M/S SDC K-2 nd	10	6	1	2-to-6 or 0.33	1-to-5 or 0.2	Almost Equal to Industry Standard
Mountainview M/S SDC 2 nd -4 th	10	8	2	3-to-8 or 0.38	1-to-5 or 0.2	Almost Equal to Industry Standard

Mountainview M/S SDC 4 th -5 th	9	5	1	2-to-5 0.40	1-to-5 or 0.2	+1.0 FTE Above Industry Standard
Mountainview M/S SDC 5 th -6 th	11	7	0	1-to-7 or 0.14	1-to-5 or 0.2	Almost Equal to Industry Standard
Rosedell M/M SDC 2 nd -4 th	14	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Almost Equal to Industry Standard
Rosedell M/M SDC 5 th -6 th	13	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Almost Equal to Industry Standard
Skyblue Mesa M/M SDC TK-K	13	13	2	3-to-13 or 0.23	1-to-7 or 0.14	Almost Equal to Industry Standard
Skyblue Mesa M/M SDC K-2 nd	10	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Almost Equal to Industry Standard
Skyblue Mesa M/M SDC 2 nd -4 th	14	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Almost Equal to Industry Standard
Skyblue Mesa M/M SDC 4 th -6 th	13	9	0	1-to-9 or 0.11	1-to-7 or 0.14	Almost Equal to Industry Standard
Tesoro del Valle M/M SDC TK-1 st	15	14	2	3-to-14 or 0.21	1-to-7 or 0.14	Almost Equal to Industry Standard
Tesoro del Valle M/M SDC 2 nd -4 th	11	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Almost Equal to Industry Standard
Tesoro del Valle M/M SDC 4 th -6 th	15	10	0	1-to-10 or 0.10	1-to-7 or 0.14	Almost Equal to Industry Standard

Source: Industry standards and district-reported data.

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

The BASES program at North Park Elementary was not analyzed because FCMAT does not have an industry standard adult-to-student ratio for SDCs designed for students with social-emotional and behavioral support needs.

1-to-1 Student Support

There is no established industry standard for special education paraeducators providing 1-to-1 student support. Many districts throughout the state have taken steps to remove the designation of 1-to-1 support because it unintentionally reinforces the concept of one adult assigned to one student. Industry practice commonly refers to both the assessment process and the special education paraeducator descriptive title as special circumstance instructional assistance (SCIA).

The SELPA has developed an SCIA process to assess whether a student requires intensive individual service, also known as 1-to-1 support from a paraeducator. This process clarifies decision-making procedures and recognizes that 1-to-1 support is a significant programmatic decision that should be based on a thorough, data-driven evaluation, considering all less restrictive alternatives. SELPA'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.

In 2023-24, the district had 80 paraeducators assigned to provide 1-to-1 student support. While there is no industry standard for comparison, this is a relatively high number for a school district of this size compared to what FCMAT has observed across the state. Staff reported that the district does not use the SELPA's SCIA assessment to determine the need for 1-to-1 paraeducator support. Instead, the district uses an environmental learning assessment or a functional behavior assessment. Staff explained they endeavor to use part of the SELPA's SCIA assessment, called the School Day Description and Support Needed or "daily grid," when assigning 1-to-1 paraeducator support to attempt to determine which parts of the school day a student requires support (e.g., for mathematics or during recess). This is as opposed to assigning the student a 1-to-1 paraeducator for the entire school day. If staff were to use the daily grid for this purpose, a 1-to-1 paraeducator may be able to be shared by more than one student at a school. This approach could reduce the number of 1-to-1 paraeducators needed and the associated costs. Moreover, it could also reduce a student's dependence on 1-to-1 paraeducator support and may help a student transition to independence over time. Staff recognized the daily grid could be used for this purpose, but the district has not yet begun analyzing daily grids to determine whether 1-to-1 paraeducators could be used by more than one student at a school.

Part of the industry standard SCIA assessment process focuses on planning for a student's transition to independence and developing annual IEP goals to support this. The SELPA's SCIA process includes an independence planning template. Staff reported that some students who have a 1-to-1 paraeducator have goal(s) for independence and a plan to reduce 1-to-1 instructional assistant support, but most do not. It is important for an IEP team to agree on goal(s) for independence because it focuses IEP services on addressing deficit areas to strengthen skills, allows the team to monitor annual progress, and helps them determine whether adjustments to the level of service are needed. It also helps the IEP team move away from the concept of assigning one adult to one student, enabling the district to assign one paraeducator to support several students when appropriate. Staff identified resistance from parents as the main barrier to reducing or removing 1-to-1 paraeducator support, regardless of whether this support is necessary or beneficial to the student.

Recommendations

The district should:

1. Add an adult-to-student ratio to its paraeducator staffing building blocks for SDCs.
2. Begin using the SELPA's SCIA assessment to determine the need for 1-to-1 paraeducator support.
3. Consistently use the SELPA's SCIA School Day Description and Support Needed, known as the "daily grid," to determine when to provide 1-to-1 paraeducator support during a student's school day. Assign 1-to-1 paraeducators to more than one student when it is possible to do so and meet the students' identified support needs.
4. Ensure that each IEP with 1-to-1 paraeducator support, except for medically necessary support, contains goals for independence and a fade plan that is actively monitored.

Related Service Provider Staffing and Caseloads

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

FCMAT analyzed staffing ratios for the district's APE teachers, occupational therapists, school nurses, school psychologists, and SLPs. Staffing ratios for other related service providers such as teachers for students who are visually impaired were not analyzed because the district contracts for these services, or there is no established industry standard. The industry standards for related service providers are listed in Table 16 below.

Table 16: 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 five through 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 Codes 56363.3 and 56441.7(a), and Pupil Services Staff by Type (CDE).

Adapted Physical Education

In 2023-24, the district had 3.0 FTE APE teacher positions, each managing an average caseload of 51.33 students receiving direct services, as shown in Table 17 below. That year, the district also had a paraeducator assigned to support the APE program who worked 6.5 hours per day. Because a paraeducator cannot perform all the duties of an APE teacher and does not perform assessments, they were not included in this staffing comparison.

Table 17: District's Adapted Physical Education Teacher Staffing, 2023-24

Provider	Number of FTE	2023-24 Total Caseload	Caseload Average	Industry Standard Provider-to-Student Ratio	Staffing Above or Below Industry Standard
APE Teacher	3.0	154.0	51.33	1-to-45-55	Within Industry Standard Range 0.42 FTE below 1-to-45 0.20 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.

The district is staffed within the industry standard provider-to-student ratio range for APE teachers at 0.42 FTE below the 1-to-45 ratio and 0.20 FTE above the 1-to-55 ratio. The district needs to continue to annu-

ally review APE teacher caseload projections, assessment loads, the number of schools each APE teacher supports, driving time between sites, direct and consultation service minutes, the support provided by the paraeducator assigned to this program, and student needs to determine if adjustments to APE teacher staffing are necessary.

Occupational Therapy

In 2023-24, the district had 7.0 FTE occupational therapists, each managing an average caseload of 53.43 students receiving direct services, as shown in Table 18 below. That year, the district also had two paraeducators assigned to support the occupational therapy program who each worked 6.5 hours per day. Because a paraeducator cannot perform all the duties of an occupational therapist and does not perform assessments, they were not included in this staffing comparison.

Table 18: District's Occupational Therapist Staffing, 2023-24

Provider	Number of FTE	2023-24 Total Caseload	Caseload Average	Industry Standard Provider-to-Student Ratio	Staffing Above or Below Industry Standard
Occupational Therapist	7.0	374.0	53.43	1-to-45-55	Within Industry Standard Range 1.31 FTE below 1-to-45 0.20 FTE above 1-to-55

Sources: District-provided data and industry standards.

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

The district is staffed within the industry standard provider-to-student ratio range for occupational therapists at 0.20 FTE above the 1-to-55 ratio and 1.31 FTE below the 1-to-45 ratio. The district needs to continue to annually review occupational therapist caseload projections, assessment loads, the number of schools each occupational therapist supports, driving time between sites, direct and consultation service minutes, the support provided by the paraeducators assigned to this program, and student needs to determine if adjustments to occupational therapist staffing are necessary.

Credentialed School Nurses

In 2023-24, the district had 4.50 FTE credentialed school nurse positions, each managing an average caseload of 2,042.67 students, as shown in Table 19 below.

Table 19: District's Credentialed School Nurse Staffing, 2023-24

Provider	Number of FTE	2023 Census Day Enrollment	Caseload Average	Industry Standard Provider-to-Student Ratio	Staffing Above (+) or Below (-) Industry Standard
School Nurses	4.50	9,192	2,042.67	1-to-2,274	+0.46 FTE

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

In 2023-24, the district was staffed at 0.46 FTE above the industry standard for credentialed school nurses. The district needs to continue to annually review district enrollment, special education enrollment, duties performed by credentialed school nurses, schoolwide needs, and student needs to determine if changes to credentialed school nurse staffing are necessary.

School Psychologists for School Age Programs

In the 2023-24 fiscal year, the district had 10.60 FTE school psychologists supporting the school age program, each managing an average caseload of 867.17 students, as shown below in Table 20. That year, the district also had 2.00 FTE school psychologists who supported the preschool program and a 1.00 FTE school psychologist who supported the general education behavior team who were not included in this staffing comparison because they were not working in the comprehensive role of a school psychologist.

Table 20: District's School Age School Psychologist Staffing, 2023-24

Provider	Number of FTE	2023 Census Day Enrollment	Caseload Average	Industry Standard Provider-to-Student Ratio	Staffing Above (+) or Below (-) Industry Standard
School Psychologist	10.60	9,192	867.17	1-to-977	+1.20 FTE

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

Note: The district's 2.0 FTE school psychologists who supported the preschool program and the 1.0 FTE school psychologist who supported the general education behavior team in 2023-24 were not included in this staffing comparison because they were not working in the comprehensive role of a school psychologist.

In 2023-24, the district was staffed at 1.20 FTE above the industry standard for school psychologists. The district needs to evaluate at least the following factors to determine if it needs to change school psychologist staffing:

- 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.
- The number of specialized programs in the district.
- Total student enrollment.
- Special education enrollment.
- Individual site needs.

Speech and Language Pathologists

Speech and Language Pathologists Serving the Preschool Program

Education Code 56441.7(a) establishes the maximum caseload for SLPs serving preschool age students at 40 students.

In 2023-24, the district had 3.0 FTE SLPs exclusively serving preschool age students, each managing an average caseload of 55.67 students receiving a direct service, as shown in Table 21 below.

Table 21: District's Preschool Speech and Language Pathologist Staffing, 2023-24

Provider	Number of FTE	2023-24 Total Caseload	Caseload Average	Education Code Standard Provider-to-Student Ratio	Staffing Above (+) or Below (-) Education Code Maximum
Speech and Language Pathologist for Preschool	3.0	167	55.67	1-to-40	-1.20 FTE

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

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

Speech and Language Pathologists Serving the School Age Program

Education Code 56363.3 establishes the maximum caseload for SLPs serving students ages five to 22 at 55 students.

In 2023-24, the district had 21.0 FTE SLPs, each managing an average caseload of 56 students receiving a direct service, as shown in Table 22 below.

Table 22: District's Speech and Language Pathologist Staffing, 2023-24

Provider	Number of FTE	2023-24 Total Caseload	Caseload Average	Education Code Standard Provider-to-Student Ratio	Staffing Above (+) or Below (-) Education Code Maximum
Speech and Language Pathologist – School Age	21.0	1,176	56	1-to-55	-0.38 FTE

Sources: District-provided data and EC 56363.3.

Note: Only students receiving direct services from an SLP were included in the caseload average for comparison with the EC 56363.3 maximum.

Speech and Language Pathologists Serving Preschool and School Age Students

In 2023-24, the district had a 1.0 FTE SLP who served preschool and school age students in the RAP. This SLP managed the cases of 72 students who received a direct service, as shown in Table 23 below.

Table 23: District's Preschool and School Age Blended Speech and Language Pathologist Staffing, 2023-24

Provider	Number of FTE	2023-24 Total Caseload	Caseload Average	Education Code Standard Provider-to-Student Ratio	Staffing Above (+) or Below (-) Education Code 56363.3 and 56441.7(a) Blended Maximum
Speech and Language Pathologist – Blended Preschool and School Age	1.0	72	72	1-to-47.5	-0.52 FTE

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

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

Summary of Speech and Language Pathologist Staffing

In 2023-24, the district's speech and language pathologist staffing was:

- **Preschool** – 1.20 FTE less than what was needed to meet the EC 56441.7(a) maximum.
- **School age** – 0.38 FTE less than what was needed to meet the EC 56363.3 maximum.
- **Blended Preschool and School age** – 0.52 FTE less than what was needed to meet the EC 56441.7(a) and EC 56363.3 blended maximum.

The statewide shortage of SLPs is contributing to the district being staffed below what is needed for SLP caseloads to be under the Education Code maximums. Adequate staffing allows SLPs to meet special education assessment timelines and provide students with direct and consultation service minutes. Given current staffing, SLPs are unlikely to be able to provide schoolwide support for the language-related prevention and intervention services that can reduce the need for special education identification. The district needs to review SLP caseload projections for 2024-25 and student needs to determine if it needs to increase its SLP staffing to meet the EC 56441.7(a) and EC 56363.3 maximums.

Recommendations

The district should:

1. Continue to regularly analyze whether all related service provider staffing ratios are aligned with current laws and industry standards and are adequate to meet student needs.
2. Analyze whether the current allocation of school nurse and school psychologist staffing is needed.
3. Review SLP caseload projections and student needs for 2024-25 to determine if it needs to increase its SLP staffing to meet the EC 56441.7(a) and EC 56363.3 maximums.

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 financial resources 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 that 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 requirement is commonly referred to as the maintenance of effort (MOE). There are limited exceptions to this requirement, 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 CDE lists the following exceptions that allow a district to reduce the amount of state and local funds spent 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 (FAPE) 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, are used to calculate special education MOE. Districts need to monitor their MOE throughout the year and analyze pro forma MOE calculations at first and second interim reporting periods. Districts should be mindful of what expenses are charged to special education SACS goal codes and take advantage of opportunities to revise or reduce the MOE.

Building Comparable Data

Resource codes in the SACS are used to identify revenue and expenditures that have specific accounting or reporting requirements or that are legally restricted. Special education SACS resource codes form the basis of a district's unrestricted general fund contribution to its special education program.

The special education finance reporting methods used by districts, county offices and SELPAs can vary. For example, some districts include legal/settlement or transportation costs, while others exclude them. Saugus Union included five years of early retirement incentive plan costs as special education expenditures, which are not always included by other districts. There are also variations in how special education funds are allocated by SELPAs. Therefore, it is not always possible to accurately compare a district's unrestricted general fund contribution to those of other districts. However, a district should evaluate a contribution that is excessive compared to other districts or that is increasing disproportionately compared to other costs.

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

- Only ongoing income and expenses were used, so one-time funding totaling \$1,442,233 in 2021-22, \$65,356 in 2022-23 and \$854 in 2023-24 were removed. Staff reported that special education expenditures charged to one-time state and federal income in 2021-22, 2022-23 and 2023-24 were generally ongoing and were budgeted by the district as ongoing special education expenditures beginning in 2023-24.
- In the period FCMAT analyzed, the district charged a few expenditures to special education SACS resource codes that were not credited to special education income, so the revenue correlating with these expenditures was removed. To match the expenditures comprising the district's unrestricted general fund contribution with the expenditures contributing to its special education MOE, the following expenditures were added: \$1,949 in 2021-22; \$2,772 in 2022-23, and \$33,034 in 2023-24. Further, the expenditures or contribution for these programs budgeted in 2024-25 were reversed.
- Full indirect costs for special education programs have not been charged using the CDE's approved rates for all the comparison years. The district reported that it has historically charged a 5% indirect cost rate to all federal programs instead of CDE's approved rate. In 2023-24, the district charged a substantial portion of indirect costs to AB 602 special education expenditures (SACS Resource 6500) for the first time, which added approximately \$900,000 to its special education program costs in 2022-23 and to the 2023-24 unrestricted general fund contribution. The district budgeted the full CDE approved indirect cost rate of 7.4% to all special education expenses in its 2024-25 adopted budget and multiyear projections. A best practice is to charge the full indirect rate to all programs, including special education SACS resource codes so that the true cost of the special education program can be determined. For continuity of data, FCMAT modified the district's reported prior year indirect cost expenses to charge the full indirect cost rate.

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:

- In 2022-23 and 2023-24, the district used Early Intervention Preschool and Mental Health Service special education resources to support students who have not been identified for special education, which is allowable by the CDE. As of 2023-24, neither program's

expenses have exceeded available funds, so those programs have not added to the district's unrestricted general fund contribution to special education.

- Expenditures with special education SACS goal codes have been charged inconsistently to nonspecial education SACS resource codes. These include the unrestricted general fund, Elementary and Secondary School Emergency Relief Fund (ESSER), Arts, Music and Instructional Materials Block Grant, Classified School Employee Summer Assistance Program (CSESAP), and other local income. FCMAT estimates the fiscal impact on the unrestricted general fund contribution to be a reduction of \$2,186,860 in 2024-25.
- In certain general education programs, expenses for supports such as paraeducators were incurred to facilitate access for students with disabilities to these programs.
- Transportation expenses are included in total special education expenditures but reported separately in Table 24 below. This is because transportation income is not reported since the California School Accounting Manual has not developed a method to match the income with the expense. In 2024-25, the district's transportation expenses will increase its special education MOE by \$2,164,000 and its unrestricted general fund contribution by \$372,000. In addition, the estimated \$620,334 in special education transportation income is not credited to the special education SACS goal code.

District Special Education Expenses

FCMAT conducted an analysis of the district's special education income and expenditures, exclusively using ongoing income (excluding one-time 2021-22, 2022-23 and 2023-24 income/expenses) from the fiscal years 2021-22 to 2024-25, as shown in Table 24 below.

Table 24: Comparison of Special Education Expenses Using Ongoing Income Only, 2021-22 to 2024-25

Category	2021-22	2022-23	2023-24	2024-25	Average Annual Rate
Increase/Decrease in Special Education Students	-2.14%	0.63%	9.63%	N/A	10.31%
Increase in Ongoing Income	4.50%	19.50%	7.10%	1.80%	7.40%
Increase in Certificated Salaries	13.70%	6.50%	10.40%	6.40%	9.20%
Increase in Classified Salaries	3.70%	6.70%	5.90%	2.40%	4.70%
Increase in Benefits	11.70%	8.90%	8.70%	7.20%	9.10%
Increase/Decrease in Books and Supplies	50.30%	-16.10%	-36.10%	-27.30%	-10.40%
Increase/Decrease in Services (Excluding Transportation)	80.10%	17.20%	-40.50%	-97.20%	-24.10%
Increase in Transportation	7.40%	16.40%	22.50%	47.90%	31.70%
Increase in Capital Expenditures	0%	100%	35.20%	50.00%	51.20%
Increase/Decrease in Tuition Excess Costs/Indirect Costs	-1.40%	-0.40%	-5.00%	147.50%	17.00%
Increase/Decrease in Adjusted General Fund Contribution	25.70%	3.90%	-0.10%	2.50%	8.30%
Adjusted Dollar Amount of General Fund Contribution	\$17,194,842	\$17,872,092	\$17,794,094	\$18,230,646	N/A
Adjusted Dollar Amount of Special Education Expenses	\$29,517,092	\$31,758,926	\$32,252,928	\$32,627,158	N/A

Sources: Official SACS unaudited actuals and 2024-25 budget data charged to special education SACS goal codes.

Notes: Official SACS unaudited actuals and 2024-25 budget data were reduced by one-time income in 2021-22, 2022-23, and 2023-24, and any Mental Health (SACS Resource 6546) or Special Education Early Intervention Pre-School (SACS Resource 6547) expenses.

Amounts and percentages in the “Increase in Ongoing Income,” “Increase/Decrease in Adjusted General Fund Contribution,” and “Adjusted Dollar Amount of General Fund Contribution” amounts were adjusted to add expenses for full indirect costs for any year they were not charged by the district.

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

The average increase in ongoing funding over the last four years has been 7.4% per year. District certificated salaries increased more than funding between 2020-21 and 2022-23. In addition, there was an average annual addition of 5% in certificated staff services, accompanied by negotiated payroll increases.

In 2023-24, the special education enrollment increased by 9.63%, but the expenses remained relatively flat. This was mainly due to the decrease in books and supplies and nontransportation services. Expenses for nonpublic school services decreased by 88% in 2023-24 since those students were placed in a SELPA regional program, which caused a reciprocal increase in tuition excess costs and transportation costs.

Staff reported that the district does not track the number of open informal complaints or update its budget based on this data. While most informal complaints are settled by offering compensatory services, the cost of those services is not tracked separately in the general ledger and therefore is unavailable. Compensatory service costs have historically not been tracked in the district; however, if it were to begin tracking the costs of settlements, it could analyze this data to identify trends.

District Unrestricted General Fund Contribution

The district's adjusted unrestricted general fund contributions, including expenditures for increased indirect costs and reductions for one-time income and redirected income, are shown in Table 25 below.

Table 25: District's Adjusted Unrestricted General Fund Contributions to Special Education, 2020-21 to 2023-24

Category	2020-21	2021-22	2022-23	2023-24
Adjusted Unrestricted General Fund Contribution	\$13,681,421	\$17,194,842	\$17,872,092	\$17,794,094
Percentage of Adjusted Special Education Costs	52.72%	58.25%	56.27%	55.17%

Sources: Official SACS unaudited actuals data.

Notes: Official SACS unaudited actuals data were reduced by one-time income in 2021-22, 2022-23, and 2023-24, and any Mental Health (SACS Resources 6546) or Special Education Early Intervention Pre-School (SACS Resource 6547) expenses. They were also adjusted to add expenses for full indirect costs for any year they were not charged by the district.

In 2023-24, the district's unrestricted general fund contribution (adjusted to add indirect costs to special education program expenditures) was 55.17%. The fluctuations in expenses observed between 2020-21 and 2021-22 were associated with declines during periods when students were generally not in attendance because of the COVID-19 pandemic. The trend now appears to be adjusting to pre-COVID 19 contribution levels. The district's unrestricted general fund contribution as a percentage of total special education costs, inclusive of indirect costs, is projected to increase to 56.27% in 2024-25.

Recommendations

The district should:

1. Continue to monitor its unrestricted general fund contribution to special education.
2. Consistently charge indirect costs to special education programs.
3. Track the number of open formal and informal complaints, and update its budget regularly based on the potential costs.
4. Track compensatory services costs related to settlements separately in the general ledger so that the cost of settlements is available for analysis.

School Transportation

Context – School Transportation Funding

Historically, school transportation has been one of the most poorly funded areas within 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, school 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. 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 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 a maintenance-of-effort 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 the 2022-23 fiscal year, school transportation funding is equal to 60% of the prior year's student transportation expenditures reported in SACS Function 3600. The LCFF transportation funding is part of this new allocation.

In addition, the Budget Act of 2022's trailer bill language reinstated school transportation data collection and required each California school district to adopt a Transportation Services Plan by April 1, 2023, outlining how it will provide student transportation to unduplicated⁵ students. The district developed and adopted a plan as required, allowing it to receive school transportation funding equal to 60% of the prior year's student transportation expenditures reported in SACS Function 3600. Future Transportation Services Plans can cover multiple years.

District School Transportation Funding

Since the inception of the LCFF, the district has received \$386,613 for school transportation. Its 2022-23 unaudited actuals financial report shows that \$1,226,008 was spent on 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 was \$735,605. Consequently, the district received an additional \$348,992 in school transportation funding for the 2023-24 fiscal year due to the Budget Act of 2022, which was a significant increase in funding.

District Transportation Delivery Model

The district contracts with Storer Transportation Services, an external transportation service provider that facilitates the district's school transportation program. The district's transportation service provider

⁵ Students who are foster youth, eligible for free or reduced-priced meals, or identified as English learners. Each eligible student is counted only once, even if they meet more than one of these criteria.

coordinates all routing and scheduling; provides dispatchers, school bus drivers, and vehicle mechanics; and trains and supervises those staff. In addition, the district has contracts with three alternative external transportation providers that are used when a student's program location and/or behavior support needs necessitate it.

The district's director of maintenance, operations, transportation, and facilities oversees its external transportation service providers. The district has built a strong relationship with its transportation service providers and its director is highly involved in day-to-day school transportation operations and is knowledgeable about school transportation laws and regulations.

All routes use buses from a district-owned fleet except three, which use buses belonging to the district's transportation service provider. Staff reported the transportation service provider's three buses are in use because the district does not have enough buses with air conditioning.

District School Transportation Costs

The district is projected to spend \$838,164 more for school transportation in 2024-25 than it spent in 2022-23, as shown in Figure 8 below. Projected school transportation costs for 2024-25 were calculated based on expenditures to date at the time of FCMAT's visit.

Total District School Transportation Costs, 2022-23 to 2024-25

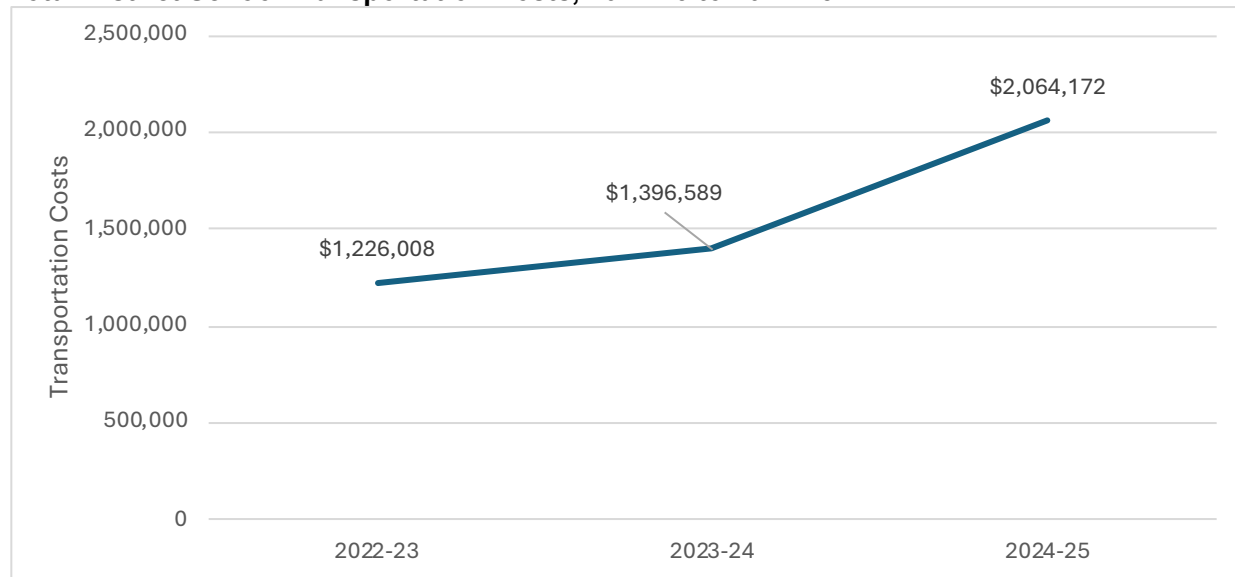


Figure 8. A graph showing the district's transportation costs from 2022-23 to 2024-25.

Source: Official SACS unaudited actual data and district-reported data.

Note: Projected school transportation costs for 2024-25 were calculated based on expenditures to date at the time of FCMAT's visit.

As previously stated, transportation expenses coded to SACS Function 3600 qualify for 60% state funding under the new law. Staff reported that the district codes most of its school transportation expenses under SACS Function 3600; however, the time for two bus attendants who ride the bus to support students appears not to be coded that way. The district needs to ensure it tracks all expenses for bus attendants (paraeducators or medical assistants) under SACS Function 3600 to maximize reimbursement.

Transportation Cost Per Route

The district spent \$87,572 per bus route in 2022-23 and \$99,756 in 2023-24, which are a lower cost per route than what is commonly observed across the state. However, this cost is projected to increase to approximately \$147,440 per bus route in 2024-25. All district schools begin and end within a 45-minute period. The district could explore whether creating more time between the start and end times at different schools would allow for fewer bus routes to service multiple school sites, thus reducing the total number of routes operated as described in the “Routing and Scheduling” section of this report.

Transportation Cost Per Student

The district spent \$9,430 per student for school transportation in 2022-23 and \$10,742 in 2023-24. Before the implementation of the LCFF in 2013, the CDE collected and published school transportation data. At that time, the average cost to transport a student enrolled in general education was approximately \$1,500 per year, while the cost for a student enrolled in special education was \$6,500 per year. At the time of FCMAT’s fieldwork, the district was projected to spend \$15,878 per student for school transportation in the 2024-25 fiscal year. Although this represents a significant increase from 2022-23, the cost of transportation labor and operations has increased substantially across the state since the COVID-19 pandemic, so these increases may be within the new norm. Staff reported that the increase in projected 2024-25 transportation expenditures occurred because the transportation service provider’s renewal contract increased by approximately 25%, which again matches statewide trends since the COVID-19 pandemic. Once the school transportation data required by the Budget Act of 2022 is published, the district can conduct a thorough comparison of recent per-student transportation costs.

In 2023-24 the district reimbursed two parents for a total of \$1,972.41 for mileage for transporting their students in lieu of receiving district-provided transportation services. At the time of FCMAT’s visit, the district had one in-lieu contract to reimburse a parent for mileage for transporting their student. The district pays for one round trip per school day of attendance using a standard parent in-lieu transportation contract and the mileage rate set by the Internal Revenue Service. Use of these parent in-lieu transportation contracts increases efficiency.

Fuel for District Vehicles

School districts are exempt from federal and state excise taxes for diesel fuel, while gasoline is exempt from federal excise taxes. FCMAT reviewed recent fuel invoices and confirmed that the district was not charged excise taxes for fuel.

Recommendation

The district should:

1. Ensure that a portion of the FTE spent working as a bus attendant is assigned to Function 3600 when staff outside the Transportation Department support students on buses.

Routing and Scheduling

Special Education Routing

The district's transportation service provider routes students who have been identified by the district for special education transportation service. The district has an administrative clerk who is the liaison between the student's case manager and the district's transportation service provider. The district gathers transportation-related student information using a transportation form and then shares it with the district's transportation service provider through a Google doc. The Google doc includes:

- Student's name.
- Student's home address.
- Student's pick-up/drop-off address (if different than the home address, such as pick-up from a daycare provider).
- Responsible parent(s), guardian(s) and/or other adult(s) identified to release the student to.
- District home school and school of program assignment (approximately 41 students receive school-to-school transportation mid-day for program services).
- Special instructions.
- Use of specialized transportation equipment such as a student safety vest or a wheelchair.

The district's administrative clerk and the transportation service provider team have a strong working relationship. However, staff reported that certain transportation-related instructions or special transportation equipment needs are communicated verbally because they are not included in the Google doc. The district needs to work with its transportation service provider to identify information that should be added to the student transportation request form, and ensure the form prompts the student's IEP team to identify transportation as a necessary related service in the least restrictive manner.

Special Education Transportation Routes

At the time of FCMAT's visit, the district was providing special education transportation to 130 students, which is approximately 9% of the students with an IEP. This percentage is typical of what is observed across the state, indicating that the district's IEP process is effective in determining whether transportation is required as a related service.

FCMAT reviewed the district's special education bus routes, which were developed by its transportation service provider. The routes are efficient and use the lowest number of routes and drivers possible. There are 118 students transported on 11.5 bus routes to district schools and 12 students transported on 2.5 bus routes to Valley View School, which is a SELPA regional program site outside district boundaries.

The district's special education bus routes have an average of approximately nine students per bus, which is lower than the 10-12 student average observed in similarly sized/operated programs. The district cannot easily achieve a higher passenger ratio because of its master bell schedule, which does not allow sufficient time between school start times for greater transportation routing efficiency. School districts can typically implement a two-tiered schedule, in which schools are grouped into tiers which start at different times to allow for a second run on each bus route in the morning and afternoon. These second runs enable school districts to increase efficiency by reducing the number of buses used and increasing the student ridership ratio.

The district's contract with its transportation service provider is based on five service hours per day, with an additional charge for extra hours. FCMAT reviewed invoices from the district's transportation service provider and found the district rarely receives an additional hourly charge. An additional hourly charge is reasonable if delays occur due to traffic, weather, or an emergency.

In 2023-24, two alternative external transportation providers, HopSkipDrive and EverDriven, transported six students. At the time of FCMAT's visit, staff reported that EverDriven transported just one student. Alternative external transportation is expensive because it is more restrictive, and often one adult is transporting one student. Staff reported alternative external transportation is used only when a student's program location and/or behavior support needs necessitate it, which is reasonable.

Recommendations

The district should:

1. Examine its transportation request form to ensure it includes all student information needed and prompts the student's IEP team to identify transportation as a necessary related service in the least restrictive manner.
2. Annually assess its transportation service provider's contract hourly base rate (five hours daily) to ensure it is sufficient.
3. Explore the potential for improved efficiency and significant savings by establishing a two-tiered master bell schedule with greater separation between the start and end times of the schools in each tier to achieve two runs per bus route in the mornings and afternoons.
4. Continue to assess whether it needs to use an alternative external transportation provider instead of the district's regular transportation service provider on a student-by-student basis.

Special Education Transportation Service

Transportation Decision Tree

A best practice is to use a transportation decision tree, which is a tree-like structure used to guide decisions, when assessing a student's need for special education transportation as a related service. Staff members reported they do not do so. Yet, the district reported providing special education transportation to approximately 9% of the students with an IEP, which is typical of what is observed across the state. This indicates that the district's IEP process is effective in determining whether transportation is required as a related service.

Parent Transportation Handbook

A best practice is to provide a special education school transportation handbook for parents. The district reported that it has not developed such a handbook. A comprehensive parent handbook that outlines the district's practices and procedures, along with contact information for key staff members, would be a useful resource for parents. It may also reduce the number of telephone calls to both the Transportation and Special Education departments.

Recommendations

The district should:

1. Consider whether use of a transportation decision tree would help IEP teams evaluate whether a student requires special education transportation as a related service to receive a FAPE.
2. Develop a special education transportation handbook for parents.

Transportation Service Provider Staffing

As previously mentioned, the district's transportation service provider employs the staff facilitating the district's school transportation program. At the time of FCMAT's visit, the district's transportation service provider had the following positions listed in Table 26 below, which are appropriate given the district's program size.

Table 26: Storer Staffing, 2024-25

Job Title	FTE or Number of Staff
Transportation Manager/State Certified Instructor	1.00 FTE
Safety Manager/Behind the Wheel Trainer	1.00 FTE
Dispatcher	1.00 FTE
Lead Vehicle Equipment Mechanic	1.00 FTE
Shop Manager/Lead Mechanic	1.00 FTE
Vehicle Equipment Mechanic	1.00 FTE
Bus Driver	14 Staff
Cover Drivers	3 Staff

Source: District-reported data.

Bus Driver Staffing and Scheduling

The district's transportation service provider has been operating with enough school bus drivers to meet daily routing requirements, which is seldom observed across the state. The district's transportation service provider reported that it has three filled substitute driver positions, which equates to a spare driver ratio of 21.4%, exceeding the industry standard of 10%.

The district's contract requires that daily routes are not to exceed five hours, which has allowed it to successfully bid for services based on a daily five-hour driver base.

Vehicle Maintenance Staffing

The district's transportation service provider employs two vehicle maintenance technicians who maintain all district school buses and support fleet and the transportation service provider's three buses used for district transportation service. The ratio of fleet vehicles to maintenance staff is appropriate.

Recommendations

The district should:

1. Annually review its transportation service provider's staffing to ensure it continues to meet district needs and be appropriate for the district's size.

Vehicle Maintenance, Fleet and Facilities

The district's transportation service provider performs maintenance for all district vehicles (21 school buses and 42 support fleet vehicles) and invoices the district. The district should ensure that specific departments are charged for the parts and labor costs associated with performing maintenance and repairs on their vehicles.

Safety Compliance Report/Terminal Record Update

California regulations require all school buses to receive an annual inspection from the California Highway Patrol (CHP) Motor Carrier Safety Unit. Any problems must be repaired before placing the vehicle back into service. The CHP Motor Carrier Inspector 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 Update," commonly referred to as the CHP terminal grade. It is important to recognize that this grade is merely a snapshot in time and does not necessarily confirm adherence to the best practices and processes expected within a robust vehicle maintenance program.

The CHP Motor Carrier Safety Unit designates school districts as either "satisfactory" or "unsatisfactory" on the Safety Compliance Report/Terminal Record Update. A satisfactory designation is the highest grade awarded to any motor carrier and indicates that the carrier is generally in compliance 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 these deficiencies may lead to severe consequences, including a recommendation to the Public Utilities Commission (PUC) to revoke the school district's motor carrier operating authority, filing a complaint with the local district attorney for potential prosecution, and seeking an injunction. Failing to correct these issues may result in criminal charges against the school district's superintendent and governing board.

Even though the district contracts with an external transportation service provider, it owns a school bus fleet that is operated and maintained by its transportation service provider. The district earned grades of "satisfactory" on its most recent CHP terminal grade inspections in August of 2022 and 2023. Given the district's satisfactory CHP terminal grades, the district and its transportation service provider are operating a safe and compliant school transportation program.

School Bus Safety Inspections

Title 13 of the California Code of Regulations, Section 1232 mandates that school buses be inspected every 45 days or 3,000 miles, whichever occurs first. 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 being performed at the required intervals.

Transportation Department Fleet and Facility

The district has a fleet of 21 school buses. In 2023-24, the district's fleet accumulated just 166,596 miles, which is relatively low. The district has done an excellent job purchasing a few buses every 2-3 years, which allows for lower fleet maintenance costs and for the fleet to meet past and current California Air Resources Board emission standards. The district's average school bus fleet model year is 2012; four school buses have a 2005 model year, and the newest four school buses have a 2020 model year.

New legislation requires that all new school buses in California be electric by 2035, with additional grant funding likely to support this transition. Staff reported that the district is already aggressively pursuing grants for electric vehicles and related infrastructure through various funding opportunities. Staff reported the district applied for the Zero Emission School Bus and Infrastructure grant and hopes to be awarded three or four electric school buses.

The district's transportation facility is located with its support services area. The facility has a modern shop with two vehicle maintenance bays, office space, adequate fleet parking capacity, and space for electric bus and vehicle infrastructure. This is also a contractual bargaining item when seeking an external transportation service provider. The district has an above ground fuel tank which allows for both gasoline and diesel fuel storage and meets the current double-walled protection design requirements. In addition, the district has an electronic fuel management system. Overall, the district's transportation facility appears to comply with general environmental regulations applicable to industrial facilities.

Recommendation

The district should:

1. Continue to pursue grants for electric vehicles and related infrastructure.

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. 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.

All annual, classroom and behind-the-wheel training sessions must be conducted by a state-certified school bus driver instructor. Behind-the-wheel training may also be administered by a behind-the wheel instructor, another classification of instructor allowed by law and certified by the CDE's Office of School Transportation. All training activities must be documented by a valid state-certified school bus driver instructor on the appropriate form.

The district's contract with its transportation service provider identifies the need for school bus driver initial training, in-service training and proficiency training. FCMAT reviewed driver training records, in-service program records, and operator proficiency logs and found no discrepancies.

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's transportation service provider adheres to this regulation with a robust safety and training program that ensures compliance.

School Bus Driver Requirements

School bus drivers are required to: (1) undergo a background check and fingerprinting for licensing and employment; (2) submit to drug and alcohol testing in compliance with US Department of Transportation rules; and (3) be enrolled in the California Department of Motor Vehicles' Employer Pull Notice (DMV-EPN) program in compliance with the California Vehicle Code.

The DMV-EPN program provides transportation service providers with an annual copy of the driver's record and updates upon any moving violation, citation, or accident. The district's transportation service provider registers school bus drivers for this program.

The district reported they do not have staff, such as teachers or coaches, who transport students in district student passenger vehicles. Therefore, it does not identify any staff in a district managed DMV-EPN program. To maintain student safety and limit its liability, if the district were to begin having staff provide transportation to students in student passenger vehicles, it would need to enroll those staff in a DMV-EPN program.

District Transportation Safety Plan

Education Code 39831.3 requires school districts to develop transportation safety plans outlining the procedures employees must follow to ensure student safety. These plans must include protocols to prevent students from being left unattended on a school bus. Additionally, each school must keep a copy of its transportation safety plan on-site for review by California Highway Patrol officers. It is best practice to review and revise these plans annually and whenever necessary.

The district has adopted a transportation safety plan in accordance with EC 39831.3, which includes bus checking procedures. The district and its transportation service provider are aware of the requirement that a copy of this plan must be maintained on-site at each district school.

Safety Drills

Education Code 39831.5 requires school districts to conduct school bus emergency evacuation drills annually. It also mandates school districts to maintain specific records for students in transitional kindergarten through grade eight who ride school buses and to announce specific safety information before every field trip. Staff reported that the drills needed to fulfill the 2024-25 annual requirement are scheduled for October.

Recommendations

The district should:

1. Continue to ensure that its transportation service provider enrolls all staff who operate district vehicles in the DMV-EPN program.

Appendix

A. Study Agreement

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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 Saugus Union 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 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 district's professional development/training program as it relates to special education, and make recommendations for improvement, if any.
9. Review the district's unrestricted general fund contribution to special education and make recommendations for greater efficiency, if any.
10. 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.
11. The Team will present the final report to the charter'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 \$40,000.

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

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

5. RESPONSIBILITIES OF THE CLIENT

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

All documents and data provided shall be responsive to FCMAT's request, in quality

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

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

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

6. **PROJECT SCHEDULE**

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

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

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

ACTION	TIMELINE
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: Michelle Barries, Assistant Superintendent Student Support Services
Telephone: (661) 294-5300
Email: mbarries@saugusd.org

17. SIGNATURES

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

For Client:



Michelle Barries
Assistant Superintendent Student Support Services
Saugus Union School District

5/29/24
Date

For FCMAT:

Michael H. Fine

Digitally signed by Michael H. Fine
Date: 2024.05.29 19:49:49 -07'00'

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

Date