FCMAT

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM

Special Education Review

August 21, 2024

Siskiyou County Office of Education

Michael H. Fine
Chief Executive Officer

FCMAT

August 21, 2024

Allan Carver, County Superintendent of Schools
Siskiyou County Office of Education
609 South Gold St.
Yreka, CA 96097

Dear Superintendent Carver:

In February 2024, the Siskiyou County Office of Education and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for FCMAT to conduct a review of the county office's special education program. The agreement stated that FCMAT would perform the following:

1. Analyze special education teacher staffing ratios, class sizes and caseloads using statutory requirements for mandated services and statewide guidelines, and make recommendations for improvement, if any.
2. Review the efficiency of staffing allocations of special education paraeducators, per Education Code requirements and/or industry standards, and make recommendations for improvement, if any. Review the procedures for identifying the need for paraeducators, including considerations related to the least restrictive environment and the processes for monitoring the assignment of paraeducators and determining the need for continued support from year to year (include classroom and 1-to-1 paraeducators).
3. Analyze staffing and caseloads for related service providers, including but not limited to speech pathologists, psychologists, occupational/physical therapists, behavior specialists, adaptive physical education teachers and other staff who may be related service providers, and make recommendations for improvement, if any.
4. Review the Special Education Department's organizational structure and staffing with the central office of the county office of education to determine whether its administration, clerical and administrative support, program specialists, teachers on special assignment and overall function are aligned with those of county offices of comparable size and structure, and make recommendations for greater efficiencies, if any.
5. Review the county office's professional development/training program as it relates to special education, and make recommendations for improvement, if any.
6. Provide one day of on-site technical assistance to the county office's business services administration to better understand the Special Education Local Plan Area's (SELPA's) funding model.
7. Review the Siskiyou County SELPA funding allocation formula. Conduct interviews with county office and SELPA personnel, as well as staff at member districts, to gain insights and perspectives on the allocation formula. Provide recommendations to the county office and SELPA, offering guidance on a potential process for revising the SELPA allocation model.

Michael H. Fine • Chief Executive Officer
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This report contains the study team's findings and recommendations.

FCMAT appreciates the opportunity to serve the Siskiyou County Office of Education and extends its thanks to all the staff for their assistance during fieldwork.

Sincerely,

Michael H. Fine
Chief Executive Officer

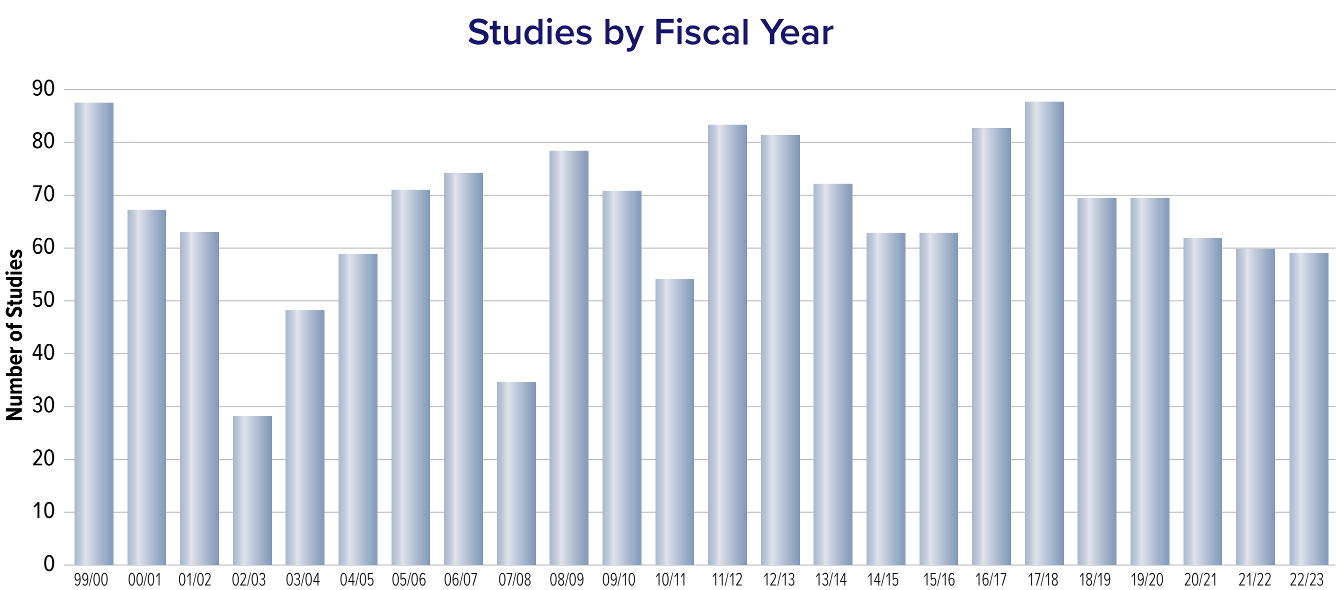
Table of Contents

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.



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.

Introduction

Background

Located in inland northern California, adjacent to the Oregon border, Siskiyou County is the fifth largest county in the state by area. According to DataQuest, Siskiyou County had an enrollment of 5,578 transitional kindergarten through grade 12 (TK-12) students in the 2023-24 academic year. In 2023-24, 11.03% of the county's TK-12 students were identified as requiring special education, which is lower than the statewide TK-12 average of 13.70%. The Siskiyou County Special Education Local Plan Area (SELPA), which is a regional service delivery model for special education, is a necessary small SELPA composed of 27 local educational agencies (LEAs), as shown in Table 1 below.

Table 1: Enrollment and the Percentage of Students in Special Education in 2023-24 for the Siskiyou County SELPA's LEAs

LEA	TK-12 Special Education Enrollment	TK-12 Total Enrollment	Percentage of Students in Special Education
Big Springs Union Elementary	14	120	11.67%
Bogus Elementary	1	15	6.67%
Butte Valley Unified	27	302	8.94%
Butteville Union Elementary	12	149	8.05%
Delphic Elementary	3	62	4.84%
Dunsmuir Elementary	6	76	7.89%
Dunsmuir Joint Union High	15	65	23.08%
Gazelle Union Elementary	5	35	14.29%
Golden Eagle Charter	39	401	9.73%
Grenada Elementary	13	207	6.28%
Happy Camp Union Elementary	12	115	10.43%
Hornbrook Elementary	7	38	18.42%
Junction Elementary	2	23	8.70%
Klamath River Union Elementary	1	5	20.00%
Little Shasta Elementary	0	19	0.00%
McCloud Union Elementary	4	50	8.00%
Montague Elementary	13	154	8.44%
Mt. Shasta Union Elementary	52	506	10.28%
Northern United – Siskiyou Charter	14	124	11.29%
Scott Valley Unified	50	624	8.01%
Seiad Elementary	1	14	7.14%
Siskiyou County Office of Education	70	70	N/A
Siskiyou Union High	48	515	9.32%

LEA	TK-12 Special Education Enrollment	TK-12 Total Enrollment	Percentage of Students in Special Education
Weed Union Elementary	49	288	17.01%
Willow Creek Elementary	7	40	17.50%
Yreka Union Elementary	98	869	11.28%
Yreka Union High	52	692	7.51%
Total	615	5,578	11.03%

Source: California Department of Education (CDE) - Enrollment for Charter and Non-Charter Schools With District Data - Siskiyou County.

Note: Northern United – Siskiyou Charter and Golden Eagle Charter are authorized by the Siskiyou County Office of Education.

In 2023-24 the share of students enrolled in special education varied among the SELPA's LEAs, from a low of 0% in Little Shasta Elementary District to a high of 23.08% in Dunsmuir Joint Union High School District.

In February 2024, the county office of education and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for FCMAT to conduct a review of the county's regionalized special education program and recommend a process to revise the Siskiyou County SELPA's allocation policy.

Study and Report Guidelines

FCMAT visited the county office of education on May 13, 14 and 15, 2024 to conduct interviews with staff from SELPA member LEAs, and with county office administrators, special education teachers, related service providers, and other staff. FCMAT continued interviews via videoconferences on May 16 and 17, 2024. 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 and clarity. In addition, this guide emphasizes plain language, 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

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

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

Executive Summary

SELPA Governance Structure

The Siskiyou County SELPA is composed of 27 LEAs and governed by a steering committee composed of its LEA's superintendents. The SELPA also has an executive council whose role and function is not well defined in the local plan. Many SELPAs have a joint advisory committee composed of special education program administrators and chief business officials, who provide input on items such as SELPA policies and procedures, operation of the special education programs, and proposed budgets. In SELPAs that use this governance structure, the joint advisory committee typically evaluates and then makes a recommendation on an item that will later be presented to the committee with decision-making authority. The SELPA needs to consider whether there is an operational advantage to restructuring the executive council into a joint advisory committee, which would evaluate and suggest revisions to items before making a recommendation on them to the steering committee.

SELPA Funding Allocation Plan

Staff reported that the SELPA's funding allocation plan, which was adopted in 2007-08, was revised slightly in the spring of 2024. The local plan and available county office documents lack sufficient detail to provide transparency about SELPA revenues, the SELPA administrative unit and county office special education program budgets and expenditures, and the bills LEAs receive for the excess costs of SELPA programs and services. Several SELPA member LEAs reported that they do not understand the existing SELPA funding allocation plan and indicated a need for more transparency about SELPA revenues and expenditures. The SELPA needs to update its current local plan to clearly outline at least the items suggested in the "Siskiyou County SELPA's Funding Allocation Plan" section of this report. If the SELPA decides to revise its local plan, the SELPA steering committee needs to carry out the process outlined in the "Recommended SELPA Funding Allocation Plan Revision Process" section of this report.

Associate Superintendent/SELPA Director Position

The SELPA is a necessary small, single county SELPA for which the county office functions as both administrative unit and provider of special education regional programs and related services. These are two distinct and independent functions, and it is not required that both functions be performed by a single LEA. Only a few of the SELPA member LEAs interviewed understood the difference between the county office and the SELPA or regarded them as separate entitles. It would be beneficial to divide the 1.0 full-time equivalent (FTE) associate superintendent/SELPA director position into two positions to create distinction and delineation between the county office and the SELPA. This would also enable the SELPA director to focus on the redefined role of SELPAs to help member LEAs improve outcomes for students with disabilities as outlined in the state's continuous improvement system of support.

Professional Development Plan

The county office would benefit from developing a comprehensive onboarding plan for the Special Schools and Services Department that is differentiated by position and addresses the items in the "Special Education Staff Onboarding" section of this report. Special Schools and Services Department staff need to be surveyed annually regarding their training needs, and the county office needs to prioritize providing training in the areas identified in the "Professional Development Plan" section of this report.

County Office Special Education Staffing

FCMAT found the county office's special education teacher staffing to be higher than required to meet Education Code and industry standard caseload averages. However, staffing appears appropriate because students in the resource specialist program (RSP) are supported through an inclusive model, which requires higher staffing levels, and students from different parts of this relatively large county are clustered into regional special day classes (SDCs). If the number of SDCs were reduced to increase class sizes, certain students would need to travel unreasonable distances to attend school.

The county office does not assign special education teacher assistants to its SDCs using industry-standard adult-to-student ratios. If the county office were to use industry-standard adult-to-student ratios to determine base staffing for its SDCs, it could still increase support in certain SDCs to meet student needs and/or account for teacher assistant/driver schedules. This would help prevent an SDC from having more special education teacher assistant support than is necessary, which is costly and can limit students' opportunities to gain independence.

The county office has more adapted physical education (APE) teachers, credentialed school nurses, and teachers of students who are deaf or hard of hearing than the industry standard adult-to-student ratios. However, because of the long travel times between districts and schools, staffing for these positions appears appropriate.

The county office has 1.71 FTE fewer school psychologists than the industry-standard adult-to-student ratio and should evaluate whether it needs to increase staffing in this area to better align with industry standards and support district, school and student needs using the factors outlined in the "School Psychologists" section of this report.

The county office has 1.05 FTE fewer speech and language pathologists (SLPs) than the caseload size indicated in the Education Code. It needs to increase SLP staffing so that its average caseload size is less than the Education Code maximum and adequate to meet student needs.

Findings and Recommendations

Siskiyou County SELPA

SELPAs

In 1977, all school districts and county offices in California were required to form geographical regions of sufficient size and scope to provide for all special education needs of children residing within the region's boundaries. Each region became known as a Special Education Local Plan Area (SELPA).

The state has 136 SELPAs, which are configured in different ways and include the following types:

- Single district.
- Multidistrict.
- Multidistrict/county office.
- Multidistrict/multicounty.
- SELPAs with joint powers agreements.
- Charter only.

The Siskiyou County SELPA is a multidistrict/county office SELPA.

SELPAs facilitate high quality educational programs and services for students with disabilities, and training for parents and educators. The SELPA fosters coordination between general and special education for prevention and early intervention and works cooperatively with other public and private agencies to support a full complement of special education services for students.

Each SELPA has a local plan that describes its policies and procedures, how special education services are provided for students, and the allocation of SELPA revenues to support shared priorities.

Siskiyou County SELPA Governance Structure

The Siskiyou County SELPA's local plan describes the SELPA's governance structure and its regional policy making process for coordinating and implementing the local plan.

SELPA Administrative Unit

Each SELPA must have an administrative unit, which serves as the legal entity and is responsible for functions such as receiving and distributing special education funds to LEA accounts, employing staff to support SELPA functions, and maintaining a SELPA office. The Siskiyou County Office of Education is the administrative unit for the Siskiyou County SELPA.

Siskiyou County SELPA Steering Committee

The local plan establishes a steering committee as the SELPA's administrative governing body. It is composed of a superintendent or designee from each SELPA member LEA, with the county superintendent of schools representing the SELPA administrative unit and the county office special education programs. The steering committee is responsible for actions such as:

- Reviewing and determining changes to the local plan.
- Adopting policies, regulations, and procedures related to the local plan.
- Approving the SELPA's annual service and budget plans.
- Establishing a community advisory committee to facilitate parent involvement.
- Directing the SELPA director regarding the development, revision, implementation, and review of the local plan.
- Approving the SELPA allocation plan for distribution of federal, state, and local funds received for special education programs.
- Advising on the number and type of SELPA staff employed by the county office to provide regionalized services.

The local plan indicates the steering committee receives and acts on information from the executive council, the community advisory committee and the SELPA director.

Siskiyou County SELPA Executive Council

The local plan states that executive council membership is limited to LEA superintendents and board designees. The executive council has seven voting members representing LEAs and the county superintendent's office. This council's role and function are not well defined other than a statement indicating the steering committee will receive and act on information from groups that include the executive council. County office staff and SELPA member LEAs described the executive council as a group that provides input on SELPA policies and procedures, operation of the special education programs, and proposed budgets. The steering committee needs to clarify the executive council's role and determine whether the executive council must formally approve an item, such as a new policy or the county office special education budget, before it is considered by the steering committee. Then the local plan needs to be updated accordingly.

SELPA Joint Advisory Committee

Many SELPAs have a joint advisory committee composed of special education program administrators and chief business officials. However, depending on the size and organization of a SELPA's LEAs, superintendents and other staff also serve on joint advisory committees. Joint advisory committees exist to thoroughly evaluate items such as changes to the local plan, policies and procedures, regional programs, and proposed budgets. Since joint advisory committees include staff with special education program and financial expertise, they can thoroughly assess proposed actions. In SELPAs that use this governance structure, the joint advisory committee typically evaluates and makes a recommendation on an item that will later be presented to a committee that has decision-making authority, such as a superintendent's council. During this process, items may be modified based on input from the joint advisory committee.

The Siskiyou County SELPA does not have a joint advisory committee, in part because many of its LEAs do not have a chief business official or program administrator solely devoted to managing the special education program. However, some of the LEAs have such positions, and during interviews, many LEAs expressed interest in a joint advisory committee that could consider and discuss SELPA-related items from a fiscal and program perspective. Thus, the SELPA needs to consider whether there is an operational advantage to restructuring the executive council into a joint advisory committee that would consider and potentially revise items before making a recommendation to the steering committee.

Recommendations

The SELPA should:

1. Outline the role and function of the executive council in the local plan, including an explanation of what the executive council is responsible for evaluating, potentially revising, and approving, before it is considered by the steering committee.
2. Consider whether there is an operational advantage to restructuring the executive council into a joint advisory committee, composed of representatives who have fiscal and special education program expertise, to consider items such as proposed budgets and policy changes and make a recommendation on them to the steering committee.
3. Update its local plan if it implements recommendation two.

State Aid for Special Education

Special education is defined by California Education Code (EC) 56031(a) as "specially designed instruction, at no cost to the parent, to meet the unique needs of individuals with exceptional needs, including instruction conducted in the classroom, in the home, in hospitals and institutions, and other settings, and instruction in physical education." As the cost of providing special education has increased because of factors such as rising employee costs, increased student behavioral and mental health needs, and the need to use contracted service providers due to special education staffing shortages, SELPAs throughout the state face ongoing obstacles in ensuring students with disabilities have meaningful access to a free appropriate public education (FAPE) to acquire the skills needed for postsecondary life.

Assembly Bill (AB) 602, which became effective in the 1998-99 fiscal year, defines the formula through which SELPAs receive state aid for special education. According to AB 602, most of the state funds for special education are distributed to SELPAs based on the total number of TK-12 students in attendance, or the average daily attendance (ADA), in the LEAs that make up each SELPA. This is independent of the number of students who receive special education services or the cost of those services and programs. In addition to the AB 602 apportionment, LEAs receive other state funding such as mental health and Workability funds, and federal aid from the Individuals with Disabilities Education Act (IDEA) to educate students with disabilities, all of which are intended to supplement the general education program, not provide a separate program.

Under federal law, students with disabilities are entitled to a FAPE regardless of available funding. State and federal special education aid are insufficient to provide FAPE for all students, so LEAs transfer funds from the unrestricted general fund to pay for the portion of special education costs that exceeds program revenues. Because federal funds may be used only to cover the excess costs of providing special education and related services to students with disabilities, LEAs must annually show that they have spent at least the same amount of state and local funds on special education services in each succeeding year. This is known as meeting the maintenance of effort, or MOE, requirement.

AB 602 Base Grant

Per AB 602, a SELPA's base grant entitlement is calculated by multiplying its funded base rate by the SELPA-wide funded ADA and is paid through the principal apportionment.

SELPA Funded Base Rate

Since AB 602 was enacted, per-ADA special education grant funding rates have historically differed significantly among SELPAs because funding was based on previous special education expenditures by the LEAs before the AB 602 legislation was adopted. The Siskiyou County SELPA historically received a higher per-ADA funding rate than most other SELPAs in the state and than the AB 602 statewide target rate (90% of the statewide average funding rate). For example, in 2018-19 the AB 602 statewide target rate was $539.67 per ADA, and the Siskiyou County SELPA was funded at $653.54 per ADA. The 2018-19 funding was reduced by 1.78%. According to the Coalition for Adequate Funding for Special Education, in 2018-19 just seven SELPAs in the state received a higher AB 602 per-ADA funding rate than the Siskiyou County SELPA.

Beginning in 2019-20, all SELPAs that received less than the AB 602 statewide target rate began receiving $545 per ADA, and the SELPA base grant was prorated by only 0.24%. Then, in 2020-21, an

AB 602 base rate, or minimum funding rate, replaced the AB 602 statewide target rate, and the SELPA prorations stopped. In 2021-22, the statewide AB 602 base rate increased above the Siskiyou SELPA's rate, so it began receiving that higher rate. AB 602 base rates have increased significantly since, and in 2023-24 the AB 602 base funding rate was $887.40 per ADA.

The Siskiyou County SELPA's base funding rate increased by $245.49 per ADA between 2018-19 and 2023-24 (inclusive of the proration factor in 2018-19). The AB 602 base funding rates from 2021-22 to 2023-24 (which were used to calculate the Siskiyou County SELPA's AB 602 base grant), and the projected base funding rate for 2024-25 from the Budget Act of 2024, are shown in Figure 1 below.

Figure 1: SELPA AB 602 base funding rates, which were used to calculate the Siskiyou County SELPA's AB 602 base grant

Source: CDE AB 602 Special SELPA Funding Exhibits - First Principal Apportionment (P-1) and CDE Funding Rates and Fiscal Information for 2024-25 - Special Education Local Plan Area (SELPA) Base Rate, EC Section 56836.146.

AB 602 Base Grant Entitlement

Per AB 602, a SELPA's base grant entitlement is calculated by multiplying its funded base rate by the SELPA's funded ADA (using the SELPA-wide ADA for the current, prior, or second prior year, whichever is greatest). The Siskiyou County SELPA's funded ADA decreased by 334.53 from 2021-22 through 2023-24 as shown in Figure 2 below.

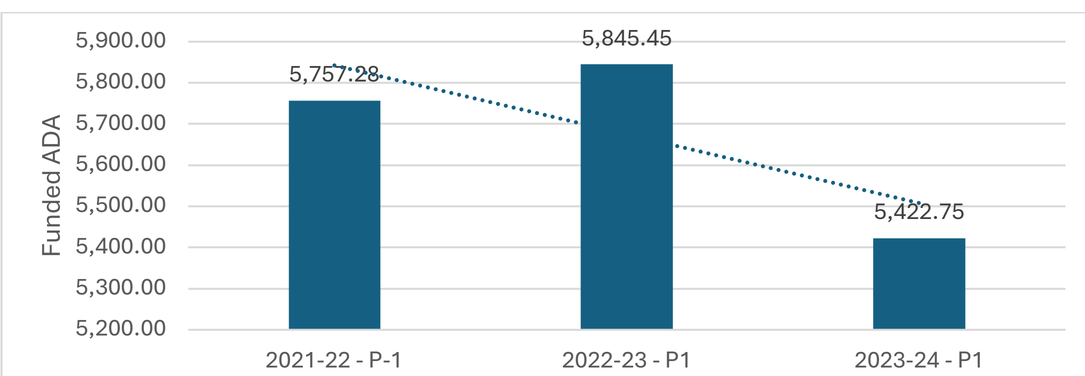


Figure 2: Siskiyou County SELPA's funded ADA from 2021-22 through 2023-24

Source: CDE AB 602 Special SELPA Funding Exhibits - First Principal Apportionment (P-1).

Despite declining SELPA-wide ADA, increases in the AB 602 base funding rates caused the SELPA's base grant entitlement to increase by $695,714.84 from 2021-22 through 2023-24, as shown in Figure 3 below.

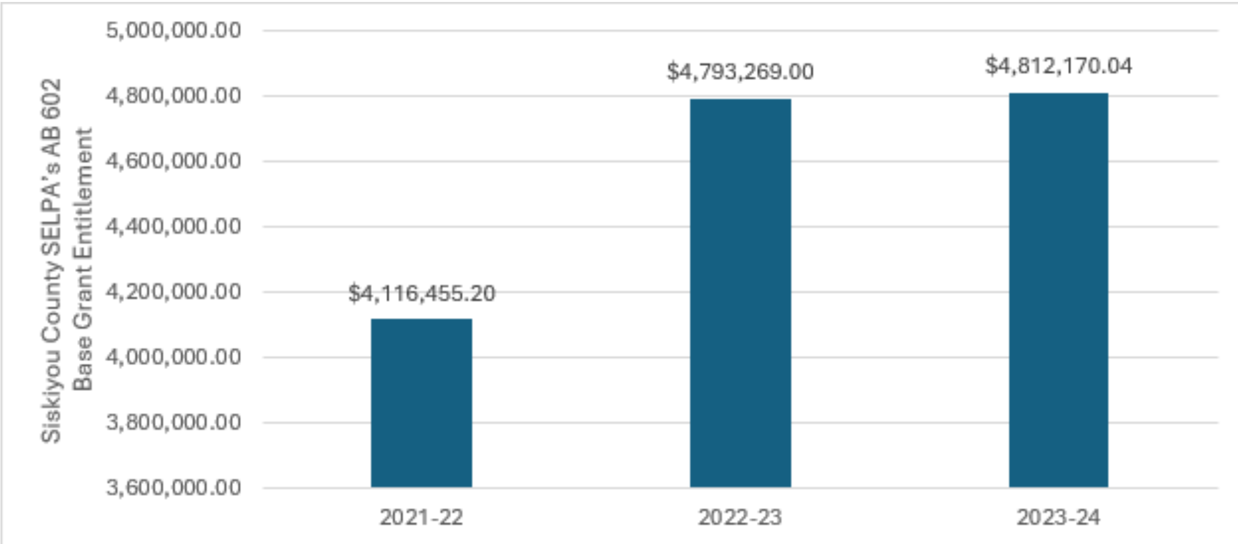


Figure 3: Siskiyou County SELPA's AB 602 base grant entitlement from 2021-22 through 2023-24

Source: CDE AB 602 Special SELPA Funding Exhibits - First Principal Apportionment (P-1).

Because AB 602 state aid is the main source of a SELPA's special education funding, it is increasingly important for the SELPA to monitor its ADA; a decline in that number could lead to a decreasing SELPA base grant entitlement because future COLA increases to the AB 602 base rates are unknown.

SELPA Funding Allocation Plans

Each SELPA is required to have a funding allocation plan designed to meet local needs and agreed upon by the SELPA's governance council. Because SELPAs are one of the earliest forms of local control, they allocate special education funds to their member LEAs in a variety of ways, including:

- By total ADA.
- By a combination of total ADA and funds allocated first for certain regional programs or services.
- By a combination of ADA and special education pupil count.
- By weighted formulas.
- By retaining all funds generated by their member LEAs for things such as operating regional special education programs, with any remainders being distributed to members or members being billed for excess costs.

A best practice is to annually review SELPA funding allocation plans so they can be revised to meet changing LEA and program needs and to accommodate funding shifts and SELPA dynamics.

Siskiyou County SELPA's Funding Allocation Plan

FCMAT reviewed the SELPA's funding allocation plan, which has been used since 2007-08. A simplified overview is shown in Figure 4 below.

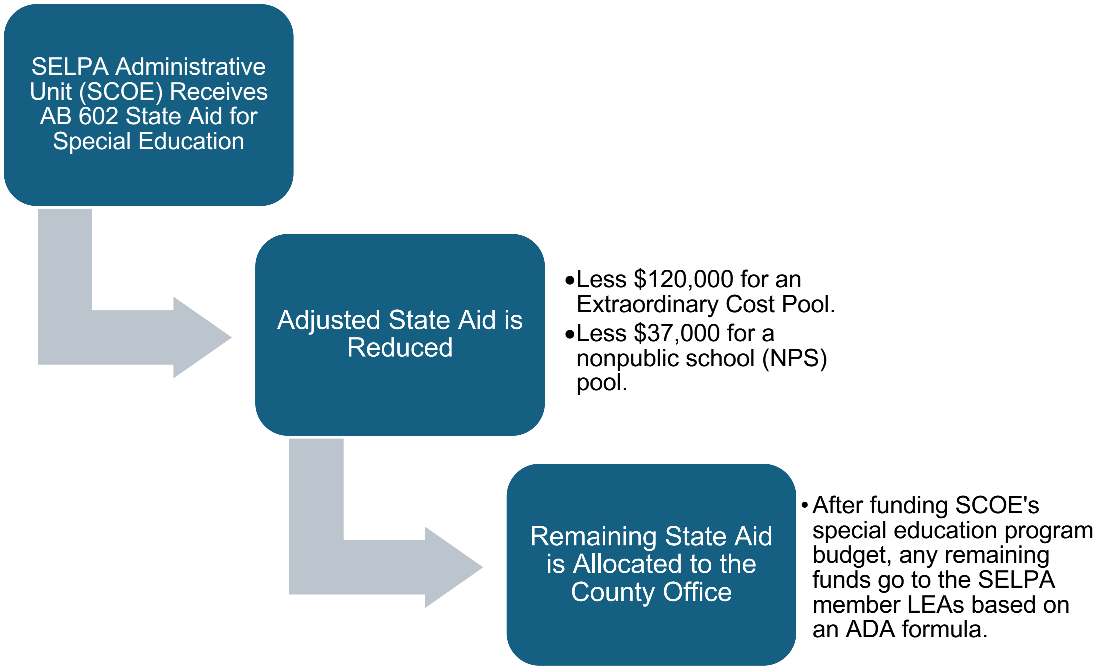


Figure 4: Graphic depicting a simplified version of the Siskiyou County SELPA's funding allocation plan

Source: FCMAT, based on the Siskiyou County SELPA Local Plan.

A best practice is for a SELPA to have a clearly written funding allocation plan outlining items such as:

- SELPA revenues collected on behalf of its member LEAs, including federal, state and local revenue.
- SELPA administrative unit expenditures, including items such as salaries and benefits (for the SELPA director, SELPA executive assistant, other employees), supplies, facilities, and indirect costs.
- Regionalized special education program and service expenditures, including items such as salaries and benefits (for special education teachers, instructional assistants, related services providers, other employees), services, equipment, facilities, and indirect costs.
- The funding distribution or bill-back method used.

Although Siskiyou County SELPA's local plan provides some information about its funding allocation plan, FCMAT found the local plan and available county office documents lack sufficient detail to provide transparency regarding SELPA revenues, the SELPA administrative unit and county office special education program budgets and expenditures, and the LEA bill-backs. A bill-back is when a SELPA member LEA is charged for a percentage of the total cost of a service they have used during the school year. During interviews, most LEAs requested a more detailed account of what they are billed for, and certain LEAs reported that they are surprised by the amount on their bills yearly because the cost of services is unclear at the beginning of the year.

The Siskiyou County SELPA needs to consider revising its local plan to clearly outline at least the following:

- The SELPA's revenue sources.
- The components of the SELPA administrative unit's budget.
- The parts of the county office's special education program and services that are funded off-the-top (i.e., paid for at the SELPA-level and accessible by any LEA at no additional cost).
- The portions of the county office's special education programs or services that an LEA may access at an additional cost for which it will be billed for (i.e.,fee-for-service program or service).
- An explanation of how LEA bill-backs are calculated for the county office's special education fee-for-service programs and services.

County Office Special Education Program Budget Development and Monitoring

County Office's Special Education Program Budget

According to the local plan, the county office's special education budget is built based on the remaining AB 602 state aid (after funding the extraordinary cost and NPS pools), the revenue from 75% to 100% of the federal IDEA funds received by the SELPA, and the revenue for program specialist/regionalized services. These services, which are part of the AB 602 apportionment, are for regionalized operations and services and direct instructional support for program specialists. The county office special education budget includes a 4% reserve to "address unknown issues such as: allocation changes, prior year adjustments, COLA and deficit changes, negotiations, high needs student, etc." The local plan states that, at year-end, any excess funds remaining in the county office special education budget will be reallocated to the districts.

The SELPA's federal IDEA revenue for 2023-24 (as of January 2024) was $1,412,498. The county office's 2023-24 special education program budget included 78.38% of these funds, and the SELPA distributed the remaining 21.62%, or $305,382, to the Yreka Union Elementary and Yreka Union High school districts. Using 78.38% of the SELPA's federal IDEA revenue to partially fund the county office's special education program is aligned with its local plan, which allows the county office to use 75% to 100% of these revenues. However, the local plan does not explain why a portion of the federal IDEA funds are distributed to only two districts, and staff interviewed did not know the reason. Thus, it is not clear why other SELPA member LEAs do not receive part of the SELPA's IDEA funds. In addition, staff did not know why the distribution amount of the federal IDEA funds to the two districts has remained the same for at least 10 years despite the SELPA's federal IDEA revenue increasing by 28.78% during that time.

County Office Special Education Program Budget Development and Monitoring

A best practice is for a regional special education program operator (such as the county office) to present its budget annually to its SELPA's governing body for approval, and to regularly update and discuss its budget, staffing and SELPA member LEA needs throughout the fiscal year. SELPA member LEAs should receive updates, and a variance analysis, at least at the interim budget reporting periods, so they can be aware of any changes in revenues and/or expenditures affecting these budgets and potential allocations or bill-backs to the SELPA member LEAs.

The local plan indicates that the executive council will review and approve the county office's special education budget in June of each year, and that the executive council will receive budget updates at first and second interim reporting periods to "allow for discussion and understanding of specific issues related to program delivery and budget impact." However, SELPA member LEAs reported that they have not regularly received SELPA administrative unit or county office special education program budget updates at first and second interim reporting periods or estimated actuals. This means they cannot predict bill-back changes and how these may affect their own LEA's ending fund balance. Without regular budget updates, SELPA member LEAs also cannot monitor their county office special education service bill-back throughout the year to verify its accuracy.

In addition, without regular county office special education program budget updates, SELPA member LEAs are missing an opportunity to discuss and provide input on at least the following:

- County office regional special education program and service implementation.
- The needs and goals of SELPA member LEAs.
- County office regional special education program enrollment and related service provider caseloads.
- Possible staffing changes for the next school year.

Accordingly, the steering committee needs to adopt calendars for county office special education program budget development and budget monitoring with at least the activities shown below. The county office needs to discuss the activities in each of these calendars with the executive and steering committees and seek approval from the steering committee for items as noted in Tables 2 and 3 below.

Table 2: Suggested County Office Special Education Program Budget Development Calendar

Month	Activity
August - October	Budget development calendar discussion and approval
	Monitor county office special education program and service implementation
	Identify county office special education program and service priorities and goals for the following school year
November - January	Project county office special education program enrollment and related service needs for the following school year
January	Discuss county office staffing needs for the following school year
February	Develop and approve budget assumptions for the county office special education budget
	Discuss and approve staffing changes for the following school year so layoff notices may be issued to classified and certificated employees if needed no later than March 15
March	First review of county office's proposed special education budget for the next fiscal year
April - May	Continue review of county office's proposed special education budget for the next fiscal year
	Public hearing and budget adoption of county office's special education budget for the next fiscal year

Source: FCMAT.

Table 3: Suggested County Office Special Education Program Annual Budget Monitoring Calendar

Month	Activity
August - October	Monitor county office special education program and service implementation and program/student needs
	Monitor county office special education program ADA
	Track and revise county office special education program estimated revenues and expenses
November	Review and adoption of first interim budget revision report for county office special education programs and services
November - January	Monitor county office special education program and service implementation and program/student needs
	Monitor county office special education program ADA
	Track and revise county office special education program and service estimated revenues and expenses
February	County office to update income to reflect final annual certification Review and adoption of second interim budget revision report for county office special education programs and services
February - June	Monitor county office special education program implementation and program/student needs
	Monitor county office special education program ADA
	Track and revise county office special education program and service estimated revenues and expenses
August	Review and adoption of year-end budget report for county office special education program and services

Source: FCMAT.

Recommended SELPA Funding Allocation Plan Revision Process

FCMAT was asked to review the Siskiyou County SELPA's funding allocation plan and provide recommendations on a process the SELPA could use if it were to revise its plan. Staff reported that limited revisions, most recently in the spring of 2024, have been made to the SELPA's funding allocation plan, which was adopted in 2007-08.

FCMAT made recommendations for the SELPA to provide a more detailed description of its current funding allocation plan in the "Siskiyou County SELPA's Funding Allocation Plan" section of this report. In addition to clarifying its current funding allocation plan, if the SELPA were to also revise its plan, the SELPA's steering committee would need to carry out the process outlined in Figure 5 below.

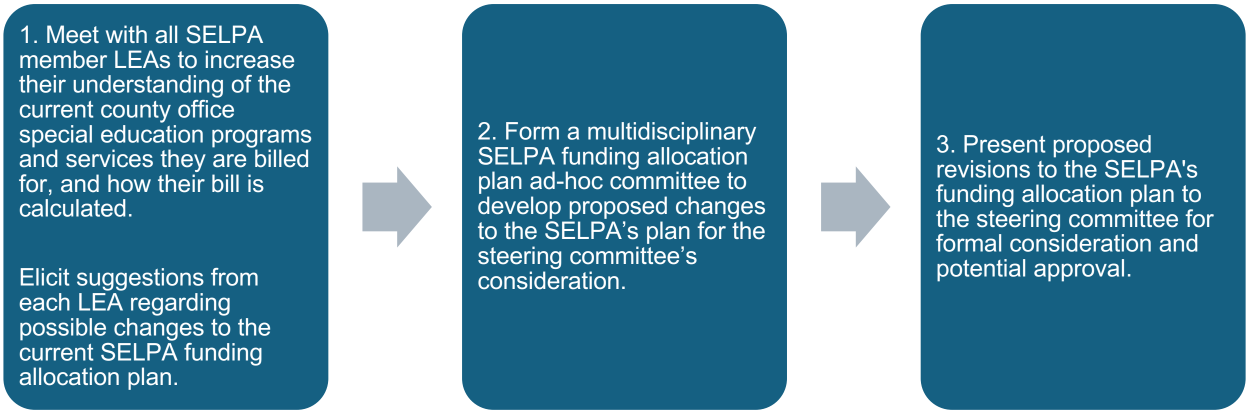


Figure 5: Graphic depicting an overview of FCMAT's recommended process if the SELPA were to revise its SELPA funding allocation plan

Source: FCMAT.

Below is a detailed description of FCMAT's recommended SELPA funding allocation plan revision process.

1. **Meet with all SELPA member LEAs to increase their understanding of the current funding allocation plan, which county office special education programs and services they are billed for, and how their bill is calculated. Elicit suggestions from each LEA regarding possible changes to the funding allocation plan.**

   The SELPA should schedule time for the county office's associate superintendent of business services, county office's budget technician who implements the SELPA funding allocation plan, and the SELPA director to meet with each SELPA member LEA (this could be 1-to-1 or in group sessions) to:

   a. Review the 2024-25 county office special education budget and increase all LEAs' understanding of at least the following:

      i. Which of the county office's special education programs and services are funded off-the-top (available for all LEAs to use at no additional cost).

      ii. Which of the county office's special education programs and services an LEA may opt out of, and whether there is a resulting reduction in their bill-back.

      iii. Which of the county office's special education programs and services are fee-for-service (available for LEAs to use at an additional cost that they will be billed for at the end of the year).

      iv. The estimated cost of each fee-for-service program and service from the county office's special education budget.

   b. Identify the continuum of special education services available for students in each LEA and discuss at least the following:

      i. The LEA's enrollment in the county office special education programs.

      ii. The LEA's use of other county office services (e.g., speech and language therapy, occupational therapy, transportation, etc.).

iii. Any areas of need the LEA has that may be preventing it from offering a full continuum of special education services while ensuring students with disabilities are educated in their least restrictive environment (i.e., with their nondisabled peers in general education settings to the greatest extent possible).

c. Recognize the pros and cons of the current SELPA funding allocation plan and discuss possible changes.

2. **Form a multidisciplinary SELPA funding allocation plan ad-hoc committee to develop proposed changes to the SELPA's plan for the steering committee's consideration.**

   The SELPA funding allocation plan ad-hoc committee could be facilitated by the SELPA director and composed of the county office's associate superintendent of business services, the county office's budget technician who implements the SELPA funding allocation plan, and a representative (e.g., superintendent, director of fiscal services, special education program director) from at least half of the SELPA member LEAs to explore possible ways to revise the existing SELPA funding allocation plan.

   First, the SELPA's funding allocation plan ad-hoc committee should develop a set of core principles (e.g., stability and predictability of funding, timely and accurate projections, transparency, serving students in the least restrictive environment, minimizing out-of-county placements) to provide a foundation for current and future evaluation and revision of the SELPA's funding allocation plan.

   Then, the SELPA's funding allocation plan ad-hoc committee should consider the suggestions from SELPA member LEAs about how to revise the funding allocation plan.

3. **Present the proposed revisions to the SELPA's funding allocation plan to the steering committee for formal consideration and potential approval.**

   Potential revisions to the SELPA funding allocation plan should be presented to the steering committee for formal consideration and possible action following the process outlined in the local plan. If changes are adopted, the SELPA's local plan should be updated accordingly.

Recommendations

The SELPA should:

1. Monitor the ADA of its SELPA member LEAs because a decline in that number could lead to a decreasing SELPA base grant entitlement since future COLA increases to the AB 602 base rates are unknown.

2. Revise the Siskiyou County SELPA's local plan to more clearly outline at least the following components of its current plan:

   - The SELPA's revenue sources.
   - Components of the SELPA administrative unit's budget.
   - The parts of the county office's special education program and services that are funded off-the-top (paid for at the SELPA level and accessible by any LEA at no additional cost).

- The parts of the county office's special education program that an LEA may access at an additional cost for which it will be billed for (fee-for-service program or service).
- An explanation of how LEA bill-backs are calculated for the county office special education fee-for-service programs and services.

3. Consider adopting county office special education program budget development and budget monitoring calendars to provide regular updates to the executive council and steering committee on budget changes and how they will affect LEA bills.
4. Consider following the process outlined in the "Recommended SELPA Funding Allocation Plan Revision Process" section of this report if the SELPA decides to revise its funding allocation plan.
5. Update the local plan if the SELPA's funding allocation plan is revised.
6. Review the SELPA's funding allocation plan at least annually to determine if modifications are needed to meet changing student, LEA and program needs, funding shifts, and SELPA dynamics.

SELPA Funding Allocation Plan Review Items

During FCMAT's review of the SELPA's funding allocation plan, FCMAT identified the following items as requiring review, regardless of whether the SELPA decides to revise its funding allocation plan.

Special Education Revenues Received by the SELPA

A SELPA has a fiduciary duty to collect funds on behalf of its member LEAs. The best practice is for SELPAs to account for all revenues in their funding allocation plan and share this information with SELPA member LEAs so all available funding is known and accounted for. Some revenue received by the SELPA is either not accounted for in its special education revenue allocation plan spreadsheet, or the use and/or allocation of the funds are not explained in the local plan; These revenue items are described below.

- The following revenue received by the SELPA was not accounted for in its special education revenue allocation spreadsheet and/or local plan: IDEA/American Rescue Plan 611 local assistance entitlement funds, alternative dispute resolution funds, special education learning recovery support funds, and mental health funds.
- The local plan does not explain how special education out-of-home care funding is used and/or distributed to SELPA member LEAs. This is funding that is received by the SELPA and must be used to support the needs of students who are foster youth, and who are placed in the short-term residential therapeutic program and three other types of facilities located within a SELPA's geographic boundaries.
- The local plan does not explain how low-incidence specialized service funding is used and/or distributed to SELPA member LEAs to meet the needs of qualifying students. This is funding that is received by the SELPA and must be used to support students with low-incidence disabilities including hearing impairments, vision impairments, severe orthopedic impairments, or any combination of these.

Distribution of IDEA Funds to SELPA Member LEAs

A best practice is for SELPAs to account for disbursements of all SELPA revenues in their local plan and funding allocation plan. As mentioned in the "County Office Special Education Program Budget Development and Monitoring" section of this report, just two SELPA member LEAs receive a fixed amount of IDEA funds. The SELPA needs to determine whether this arrangement should continue and update its local plan to reflect any distribution of IDEA funds to SELPA member LEAs.

SELPA Bill-Backs

- School Transportation -Generally Accepted Accounting Principles require matching the cause of expenses with the effect of generating income. The SELPA has been offsetting its school transportation bill-back to its member LEAs based on 2012-13 school transportation income apportioned from the CDE. However, 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 Function 3600. At the time of FCMAT's visit, the SELPA had not updated the school transportation bill-back to account for this additional income.

However, as of the publication date of this report, the SELPA is accounting for this additional school transportation income in its bill-back formula.

- Utilities - An explicit cost is a tangible and quantifiable expenditure such as wages, rent, materials or utilities. Measuring explicit costs requires meticulous tracking. SELPAs often agree on a rate they will be charged by SELPA member LEAs that host a regional SDC program at one of their school sites. The rate is typically based on a cost per square foot that includes utilities, custodial services and any other variables deemed reasonable. The Siskiyou SELPA's bill-back for utilities is outlined in the local plan and based on an explicit cost model. Staff indicated the SELPA is billed for the cost of power at seven schools where regional SDC programs are located, based on a formula that uses a rate established in 2012-13. This formula does not appear to be supported by explicit cost data or the local plan. The SELPA needs to consider determining a rate per square foot that includes utilities, custodial and any variables deemed reasonable, and adjusting the utility bill-back in its local plan.

Recommendations

The SELPA should:

1. Report all federal and state special education funding it receives in its special education revenue allocation spreadsheet.
2. Update its local plan to explain how the Special Education Out-of-Home Care and Low Incidence funds are used at the SELPA level and/or distributed to SELPA member LEAs.
3. Determine whether it should continue distributing some of its IDEA funds to two LEAs, and update its local plan to reflect whatever the agreed-upon distribution of IDEA funds to SELPA member LEAs is.
4. Consider revising its utility bill-back to be based on a rate per square foot, which would help an LEA that hosts a regional program recover costs for items such as utilities and custodial services. If the utility bill-back is revised, update its local plan accordingly.

Siskiyou County SELPA Administrative Structure

The county office serves as both the SELPA administrative unit and the operator of all regional special education classroom programs and related services for the SELPA. These are two distinct and independent functions that are not required to be performed by a single LEA. Even though the county office serves in both roles, it and the SELPA should be distinct entities. During interviews, SELPA member LEAs did not distinguish the functions and responsibilities of the SELPA from those of the county office, and most viewed them as the same entity.

The SELPA has a 1.0 FTE associate superintendent/SELPA director who has two roles: implementing the SELPA's local plan and administering the county office special education regional programs and services. The associate superintendent/SELPA director is employed by the county office, which is organized as shown in Figure 6 below.

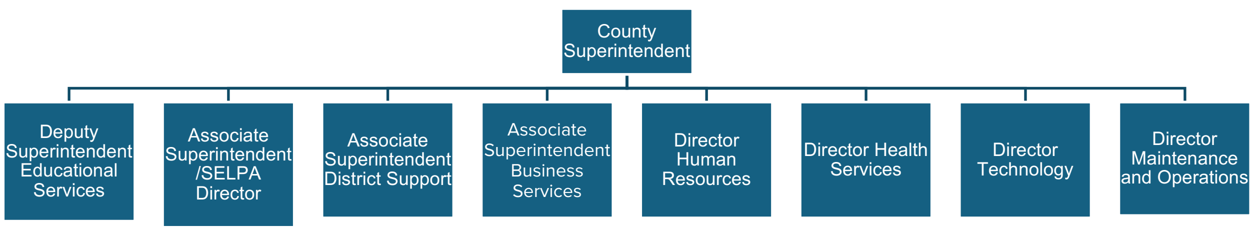


Figure 6: Simplified version of the Siskiyou County Office of Education's organizational chart in 2023-24

Source: County Office-supplied documents.

Associate Superintendent/SELPA Director Position

Staff reported that the associate superintendent/SELPA director position has historically implemented the SELPA's local plan and administered the county office special education regional programs and services. These dual roles have supported the belief that the SELPA and the county office are synonymous. However, the county office is one of the SELPA member LEAs; it is not the SELPA. To distinguish between the SELPA and the county office regional special education programs and services, the SELPA could consider splitting the 1.0 FTE associate superintendent/SELPA director position into two positions as described below.

1. A 1.0 FTE director of special education to lead the county office regional special education programs and services and be hired, directed, supervised, and evaluated by the county superintendent of schools.
2. A 1.0 FTE SELPA director who would be employed by the county office but selected, directed, supervised, and evaluated by the Siskiyou County SELPA's governing board.

If this change were made, the SELPA governing board and county superintendent of schools could determine whether the SELPA could eliminate one of the county office's principal/program manager positions, because the new county office director of special education could take on some of these duties.

Splitting the associate superintendent/SELPA director position into two positions would also provide the SELPA director with time and capacity to facilitate the redefined roles and responsibilities of SELPAs as outlined in California's System of Support (see details about the system below).

California's System of Support

California's public school accountability system, based on the Local Control Funding Formula (LCFF), includes a system of support as one of its central components. This new accountability and continuous improvement system includes a three-level framework:

- **Level 1** is support from state and local agencies for all LEAs and schools to improve performance across LCFF priorities.
- **Level 2** is differentiated assistance through county superintendents, the California Department of Education, charter authorizers, and the California Collaborative for Educational Excellence for certain LEAs to help improve low performance.
- **Level 3** is intensive intervention from the state superintendent of public instruction for LEAs that have persistent low performance.

The main goal of California's system of support is to help LEAs and their schools meet the needs of every student they serve. EC 52059.5(b) states that the purpose of the system of support is to build the capacity of LEAs in each of the following areas:

- Support the continual improvement of student performance in each of the eight state priorities described in EC 52060(d).
- Address the gaps in achievement between student groups identified in EC 52052.
- Improve outreach and collaboration with education partners to ensure that the goals, actions and services described in school district and county office of education local control and accountability plans reflect the needs of students and the community, especially for historically underrepresented or low-achieving groups.

Because the LCFF holds LEAs accountable for improving student performance and narrowing performance gaps between student groups, and because the largest performance gaps are often among students with disabilities, SELPAs are uniquely positioned to use a network of well-established resources to help LEAs improve outcomes for these students.

Role of SELPAs in California's System of Support

To help implement California's System of Support, the SELPA Administrators of California have stated that the role and responsibilities of SELPAs need to shift to give priority to the following:

- Participating in SELPA member LEAs' Local Control and Accountability Plan (LCAP) process.
- Building capacity of SELPA member LEAs to implement high-leverage and evidence-based practices.
- Developing annual plans to ensure compliance with all federal and state laws and regulations, and with SELPA policies to align SELPA goals and services with SELPA member LEAs' LCAP priorities.
- Facilitating SELPA member LEA improvement efforts to ensure best practices and a culture of continual improvement.
- Providing oversight and monitoring to ensure a full continuum of educational options (including oversight of NPSs).

Although some of these new SELPA priorities are related to traditional SELPA roles and responsibilities, in the era of LCFF the SELPA Administrators of California have redefined the role of SELPAs to serve as capacity builders, facilitators, and connectors, as outlined in Table 4 below.

Table 4: SELPA Administrators of California – Role of SELPAs

SELPAs as Capacity Builders	SELPAs as Facilitators	SELPAs as Connectors
SELPAs provide targeted technical assistance resulting in quality programs with aspirational goals for student achievement and engagement in the least restrictive environment.	SELPAs facilitate equity in local decision-making and access to the full continuum of supports and services in the least restrictive environment for students with disabilities.	SELPAs' ability to connect is rooted in the foundation of shared leadership, local control, expertise in a variety of areas, and relationships across many perspectives - education, advocacy, community, and policy.
As partners in quality assurance monitoring and differentiated assistance processes, SELPAs use continual improvement as a framework for identifying equity gaps and improving student outcomes.	Leadership support for local governance structures is provided by SELPAs in the allocation of resources and dissemination of essential information.	As a member of the system of support, SELPAs provide technical assistance, including differentiated assistance and work with the LCAP development, to improve student achievement.
SELPAs provide professional development on high-leverage and evidenced-based practices as well as collaborate with statewide reform efforts.	SELPAs collaborate with LEAs to ensure alignment of statewide and local improvement efforts.	SELPAs encourage parent and community engagement within the LEAs through a community advisory committee (CAC) that provides a forum for collaboration, training, and advice about special education programs and services.
	SELPAs build positive relationships among education partners to ensure quality outcomes for students by providing conflict prevention services and trainings.	Through interagency partnerships, SELPAs leverage resources and opportunities to help districts and families access specialized services and supports, enhance learning opportunities, and develop innovative programs to improve outcomes for children.

Source: SELPA Administrators of California Website - SELPAs in the Statewide System of Support.

Splitting the associate superintendent/SELPA director position into two positions would allow the SELPA director to focus on the redefined role of SELPAs to serve as capacity builders, facilitators, and connectors as outlined above.

County Office Special Schools and Services Department Staffing

In the 2023-24 fiscal year, the associate superintendent/SELPA director position oversaw six other positions in the Special Schools and Services Department, as shown in Figure 7 below.

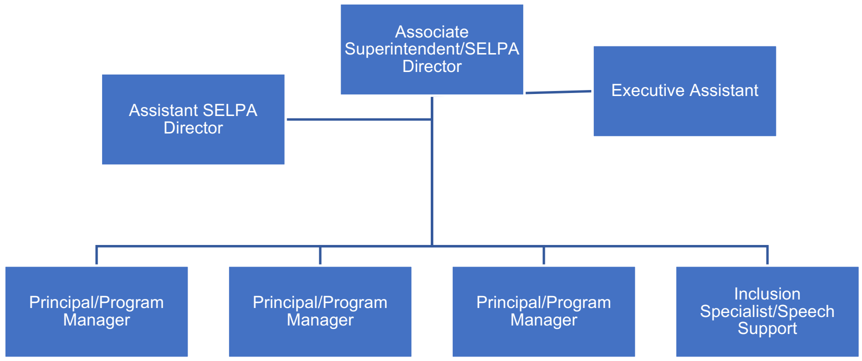


Figure 7: Positions overseen by the Associate Superintendent/SELPA Director in 2023-24

Source: County-office-provided data.

Staff reported that the assistant SELPA director position was removed from the 2024-25 county office special education program budget after it was not filled in 2023-24. Staff also stated that the county office added one principal/program manager position and eliminated the inclusion specialist/speech support position in its 2024-25 special education program budget for a total of four principal/program manager positions. Therefore, in the 2024-25 fiscal year, the county office Special Schools and Services Department will have 5.0 FTE administrator and leadership positions in the central office, as shown in Table 5 below.

Table 5: County Office Special Schools and Services Department Administrator and Leadership Positions, 2024-25

Position Title	Number of Positions	Total FTE
Associate Superintendent/SELPA Director	1	1.0
Principal/Program Manager	4	4.0
Total	5	5.0

Source: County-office-provided data.

In the 2024-25 fiscal year, the county office Special Schools and Services Department will have 2.5 FTE administrative support staff, as shown in Table 6 below.

Table 6: County Office Special Schools and Services Department Administrative Support Staff Positions, 2024-25

Position Title	Number of Positions	Total FTE
Executive Assistant	1	1.0
Administrative Secretary	1	1.0
Data Management Specialist	1	0.5
Total	3	2.5

Source: County-office-provided data.

Note: The department's transportation supervisor and health services executive assistant were excluded from the total number of positions in this analysis and the below comparison because not all county offices offer the services these positions provide.

Special Education Central Office Staffing Comparison

FCMAT conducted an informal survey of county offices in California that are members of a multidistrict/county office SELPA and have a countywide student enrollment similar to that of Siskiyou County. The survey focused on gathering information about county offices' special education staffing in two areas:

1. Administrator/leadership positions, including positions such as directors, assistant directors, coordinators, program specialists, and teachers on special assignment (TOSAs). These positions do not necessarily require an administrative credential.

2. Administrative support positions, including positions such as secretaries, administrative assistants, filing clerks, and data technicians.

Table 7 below compares Siskiyou County's staffing to the responses from the two other county offices that replied to FCMAT's survey. Among these comparison counties, the average number of FTE administrator/leadership positions that support special education is 3.5; Siskiyou County reports a higher figure of 5.0 FTE in this category. The special education administrative support positions in the central office average 2.0 FTE among the comparison districts, whereas Siskiyou County reports a slightly higher figure of 2.5 FTE.

Table 7: Special Education Leadership and Support Staffing Comparison

County	2023-24 Census Day Enrollment	2023-24 Special Education Enrollment	2023-24 Administrator/ Leadership Position FTE	2023-24 Administrative Support Position FTE
Colusa County Office of Education	4,720	692	4.0	3.0
Inyo County Office of Education	3,946	526	2.9	1.0
Average FTE			3.5	2.0
Siskiyou County Office of Education	5,578	615	5.0	2.5

Sources: 2023-24 Enrollment By Subgroup Filtered by County - CDE and county office-provided information in response to FCMAT survey.

Notes: Siskiyou County Office of Education was excluded from the average FTE calculations.

Teachers on special assignments were included in administrator/leadership FTE if they performed special education program support functions in the county office.

Any variances in FTE are due to FCMAT's interpretation of the information shared via survey.

The county office has 1.5 FTE more administrator/leadership positions and 0.5 FTE more administrative support positions for its special education program than the comparison county offices. Staff and SELPA member LEAs interviewed indicated that current staffing is appropriate given the large number of SELPA member LEAs, the great distance between districts, schools and SDCs in this relatively large county, and because only a few of the SELPA member LEAs employ their own special education staff.

Recommendations

The county office and SELPA should:

1. Consider splitting the 1.0 FTE associate superintendent/SELPA director position into two positions.

2. If the recommendation above is implemented, create a job description for a new county office director of special education position, and determine this position's essential duties

in the context of existing administrative positions that support the special education program.

3. If the first recommendation above is implemented, create a job description for a new SELPA director position that includes certain essential tasks from the current associate superintendent/SELPA director position and adds at least the following essential tasks:
   - Support SELPA member LEAs' LCAP processes.
   - Build the capacity of SELPA member LEAs to implement highly effective evidence-based practices.
   - Develop annual assurance support plans to align SELPA goals and services with SELPA member LEAs' LCAP priorities.
   - Support SELPA member LEA improvement efforts to ensure best practices and a culture of continual improvement.
4. If the first recommendation above is implemented, evaluate whether it can eliminate one principal/program manager position.

Professional Development Plan

Special Education Staff Onboarding

In addition to legally required trainings for new school employees, such as child abuse prevention training, a best practice is for new staff to receive information about an organization's policies and procedures and training that is aligned with their job responsibilities. Staff reported that new county office staff receive mandated trainings and are required to participate in nonviolent crisis intervention training. However, most county office special education staff interviewed reported that their onboarding experience was inadequate to meet the needs of their positions in areas including electronic data management systems and Special Schools and Services Department policies and procedures. Staff turnover and the lack of a plan for training new employees contribute to these difficulties. This can cause inconsistent practices and may increase staff employee and turnover.

The county office would benefit from developing a comprehensive onboarding plan for the Special Schools and Services department that is differentiated by position. The county office needs to consider providing training, as appropriate and based on a position's job responsibilities, in at least the following areas:

- County office mission and vision.
- County office policies, procedures, organizational chart, and whom to go to with questions or when help is needed.
- Special Schools and Services Department policies and procedures.
- The SELPA-wide continuum of service options.
- Positive behavior supports.
- Nonviolent crisis intervention.
- Use of curricular and instructional materials.
- Use of electronic data management and reporting systems such as the student information system, and special education information system.

Special Education Staff Ongoing Training

The best practice is for special education staff to regularly receive training to develop their knowledge and skills and stay up to date with current research-supported, evidence-based practices. The county office annually sends some of its employees to training courses that are aligned with their job responsibilities. For example, in the past few years two school psychologists attended an Autism Diagnosis Observation Schedule training, a few special education teachers attended a Picture Exchange Communication System (PECS) Basic training, and the SELPA's attorney provided training for some special education staff on special education-related legal requirements.

Despite these opportunities, most county office special education staff interviewed reported needing additional training, and some staff reported that they had not been invited to attend a training they would have benefited from even though a colleague with the same or a similar job had attended. For example, a few special education teachers reported they would have benefited from attending the PECS Basic training, but only some teachers were able to attend. Contributing to these difficulties was staff turnover, a lack of substitutes so staff could be released to attend training, and the lack of enough paid time for training. This can hinder an employee's job performance and increase staff stress and turnover.

Based on interviews, the county office needs to consider offering professional learning for its special education staff in the following areas:

- Trauma-informed care.
- Sensory support needs.
- Positive behavior supports.
- Inclusive practices and differentiation.
- Universal design for learning (UDL).

Special Education Teacher Assistant Training

The best practice is for special education teacher assistants to receive regular training so they gain an understanding of how to work with students with disabilities and stay up to date with research-supported, evidence-based practices. Staff reported that county office special education teacher assistants participate in mandated training, and some receive additional formal training on topics such as nonviolent crisis intervention and/or informal training from their classroom teacher or by shadowing other special education teacher assistants. However, most county office staff members interviewed indicated that the county office's special education teacher assistants 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 and a lack of substitutes that would allow for training to be provided during regular school hours. Identifying training time is particularly difficult in this county because many of the special education teacher assistants provide transportation for students before and after school, so training cannot be provided during those times. A lack of training may result in less effective support for students and may create liabilities for the county office.

Recommendations

The county office should:

1. Develop a comprehensive onboarding plan for its special education staff, and ensure it is differentiated to meet the unique needs of each position and considers the areas mentioned in the "Special Education Staff Onboarding" section of this report.
2. Consider providing training for county office special education staff in the following areas: trauma-informed care, sensory support needs, positive behavior supports, inclusive practices and differentiation, and UDL.

3. Survey the county office special education staff annually to understand their professional learning needs.

4. Develop a plan to facilitate better access for special education teacher assistants to professional development in areas such as disability awareness, positive behavior supports, deescalation strategies, implementing accommodations and modifications, and differentiation strategies.

Special Education Teacher Staffing

FCMAT compared the county office's special education teacher staffing for RSP and SDC programs to 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.

In the 2023-24 fiscal year, the county office had 4.7 FTE RSP teacher positions. Based on caseload estimates provided by the county office, the 4.7 FTE RSP teachers managed the cases of 103 students, averaging 21.91 students per teacher, as shown in Table 8 below.

Table 8: Resource Specialist Program Teacher Staffing, 2023-24

Total RSP Teacher FTE	Total RSP Student Caseload	Average RSP Teacher Caseload	RSP Staffing Above (+) or Below (-) EC Standard
4.7	103	21.91	+1.02

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

SELPA-wide RSP teacher staffing is 1.02 FTE above what is needed to meet the EC 56362(c) standard. However, reducing RSP teacher staffing is not necessary because the EC 56362(c) standard is based on a maximum caseload, which is higher than the statewide caseload average commonly observed in LEAs with RSPs that have an inclusive model.

Although its definition varies among California's LEAs, the intent of an inclusive model is to enable students to attend their neighborhood schools, enroll and progress through the grade levels that match their chronological ages, and access general education classes and curricula to the greatest extent possible. In addition, under this model, specialized academic instruction is provided either in the general education classroom or through a pull-out service (in which a student is removed from the general education class setting for a period during the school day for specific skill building) depending on students' needs. Overall, the SELPA's LEAs use an inclusive model, which requires the current RSP teacher staffing to support students' needs.

The county office should continue to annually review data on RSP teacher caseload projections and student needs to determine whether adjustments to RSP teacher staffing are necessary.

Special Day Class Teacher Staffing

Self-Contained Classes for Students with Moderate-to-Severe Support Needs

The county office operates regional, self-contained classes for students with moderate-to-severe support needs. The Education Code does not specify maximum caseloads for these programs, but the industry standard is 10-12 students per teacher.

In the 2023-24 fiscal year, the county office had 10.3 FTE teachers leading noncategorical moderate-to-severe SDCs. The county office reported that these teachers managed the cases of 77 students, as shown in Table 9 below.

Table 9: Moderate-to-Severe Special Day Class Teacher Staffing in 2023-24

SDC Support Level	SDC Focus	Total Teacher FTE	Total Student Caseload	Teacher Caseload Average	Industry Standard Caseload Range
Moderate-to-Severe	Noncategorical	10.3	77	7.48	10-12 students per teacher

Sources: County-office-provided data and industry standards.

The average caseload for teachers leading noncategorical moderate-to-severe SDCs is 2.52-4.52 students below the industry standard caseload range of 10-12 students per teacher. However, this appears appropriate because students from different parts of this relatively large county are clustered into these regional SDCs. If the county office were to reduce the number of its noncategorical moderate-to-severe SDCs, some students would need to travel unreasonable distances to attend school.

Self-Contained Classes for Students with Social-Emotional Needs

The county office operates two regional, self-contained classes for students with social-emotional needs. The Education Code does not specify maximum caseloads for these programs and there is not an industry standard.

In the 2023-24 fiscal year, the county office had 2.0 FTE teachers leading SDCs for students with social-emotional needs. The county office reported these teachers managed the cases of 11 students, for an average caseload of 5.5 students per teacher. This appears appropriate because the two classes cannot be combined into one because one class serves students in kindergarten through grade 8, and the other class serves students in grades 9 through 12.

The county office will need to continue to annually review data on SDC teacher caseload projections and student needs to determine whether adjustments to SDC teacher staffing are necessary.

Recommendations

The county office should:

1. Continue to annually review data on RSP teacher caseload projections and student needs to determine whether adjustments to RSP teacher staffing are necessary.
2. Continue to annually review data on SDC teacher caseload projections and student needs to determine whether adjustments to SDC teacher staffing are necessary.

Special Education Teacher Assistant Staffing

Special education teacher assistants, also known as instructional assistants or paraeducators, are trained professionals who work with students, usually under the direction of a classroom teacher. Special education teacher assistants work 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 county office employs special education teacher assistants under the following job titles:

> **Behavior Management Assistant** – The job description states, "Under the direction of a supervisor, this position will provide in-depth, intensive support to Siskiyou County students with behavioral issues including implementation of comprehensive positive behavioral support plans and effective behavior management strategies."
>
> **Speech Language Pathology Assistant** – The job description states that under the direction of a speech language specialist, this position, "…assists with language development, oral-motor control for speech production and vocalization. May also monitor the use of communication devices and systems."
>
> **Teacher Assistant** – The job description states, "The Teacher Assistant performs a variety of general classroom assistance duties, physical assistance duties, specialized health care duties and does related work as required."
>
> **Teacher Assistant/Driver** – The job description states, "The scope of duties includes a variety of general classroom assistance, physical assistance, specialized health care assistance, and providing transportation as defined in student IEPs."
>
> **Teletherapist Aide** – The job description states, "Under the general supervision of a Speech/Language Specialist, the Teacher Assistant-Speech Aide assists with the instruction, of developmentally, communicatively, or physically disabled children and youth to enable them to particulate in their environment as independently as possible."
>
> **Vocational Technician** – The job description states that this position focuses on, "…increasing services for vocational education and community awareness and pupil programs."

Of these job categories, industry standard staffing ratios only exist for special education teacher assistants as described in the next section of this report.

Special Education Teacher Assistant Staffing for Special Day Class Programs

The industry-standard base staffing for SDCs is to assign one to two special education teacher assistants for every teacher in SDCs supporting students with mild-to-moderate and moderate-to-severe support needs. In SDCs for students with autism, the standard is two to four special education teacher assistants for every teacher. Additionally, the industry standard for staffing beyond the SDC base staffing is determined by an adult-to-student ratio, as shown in Table 10 below.

Table 10: Industry-Standard Teacher Assistant Staffing and Adult-to-Student Ratios

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

Source: Industry standards.

Notes: The industry-standard special education teacher assistant staffing should be determined by class size to meet the adult-to-student ratio.

Both the classroom teacher and special education teacher assistant(s) are included in the adult-to-student ratio.

Staff reported that the county office does not assign special education teacher assistants to its SDCs using adult-to-student ratios. In part this is because most of its SDCs have at least one teacher assistant/driver position, and in some SDCs all support staff are teacher assistant/drivers whose in-class hours are less than the full school day because they transport students. In addition, based on student needs, staff reported that some SDCs are assigned additional teacher assistant support.

If the county office were to use industry-standard adult-to-student ratios to determine base staffing for its SDCs it could still increase support in certain SDCs to meet student needs and/or account for teacher assistant/driver schedules. Use of industry-standard adult-to-student ratios would help prevent an SDC from having more special education teacher assistant support than is necessary, which is costly and may limit the opportunities of students with disabilities to gain independence.

1-to-1 Student Support

There is no industry standard for special education instructional assistants who provide 1-to-1 student support. Many LEAs throughout the state have taken steps to remove the designation of 1-to-1 support because it unintentionally reinforces the concept of one adult assigned to one student. Industry practice commonly refers to both the assessment process and the special education instructional assistant descriptive title as an SCIA.

The county office has licensed vocational nurses and one behavior management assistant who provide 1-to-1 student support but does not have any special education teacher assistants who do so. The county office uses an SCIA process to assess whether a student requires 1-to-1 support, which is the best practice because it clarifies decision-making processes and procedures. This practice also recognizes that assigning 1-to-1 student support is a significant program decision that should be based on a thorough, data-driven evaluation that includes considering all less restrictive alternatives. Consistently requiring an SCIA assessment process to determine the need for 1-to-1 support ensures an LEA is making data-driven decisions and considering less restrictive alternatives before assigning 1-to-1 support.

Recommendations

The county office should:

1. Assign special education instructional assistants to its SDCs using industry-standard base staffing and an adult-to-student ratio.
2. Consistently use its SCIA process to determine the need for 1-to-1 student support.

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 Code of Federal Regulations, 300.34). These services are written into students' IEPs and include but are not limited to adapted physical education, speech and language therapy, and occupational therapy.

FCMAT analyzed staffing ratios for the county office's APE teacher, credentialed school nurses, teacher of students who are deaf or hard of hearing, teacher of students who are visually impaired, occupational therapists, school psychologists, and speech-language pathologists. Staffing ratios for other related service providers were not included in the analysis because there is no industry standard for those. The industry standards for related service providers are listed in Table 11 below.

Table 11: 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

Source: Industry standards, EC 56363.3, and CalEdFacts - Publications (CDE).

Adapted Physical Education

In the 2023-24 fiscal year, the county office had a 1.0 FTE APE teacher who managed the cases of 21 students receiving direct services, as shown in Table 12 below.

Table 12: APE Teacher Staffing in 2023-24

Provider	Number of FTE	2023-24 Total Caseload	Caseload Average	Industry Standard	Staffing Needed to Meet Industry Standard
APE Teacher	1.0	21	21	1-to-45-55	0.47 FTE to meet 1-to-45 0.38 FTE to meet 1-to-55

Sources: County-office-provided data and industry standards.

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

The county office needs a 0.47 FTE APE teacher to meet the 1-to-45 APE teacher to student ratio and a 0.38 FTE APE teacher to meet the 1-to-55 APE teacher to student ratio of the industry standard range. However, given that the county office's APE teacher provides consultation for 64 students and has significant travel time to serve students countywide, current APE teacher staffing appears appropriate. The county office needs to continue to annually review APE teacher caseload projections, the assessment load, direct and consultation service minutes, travel time, and student needs to determine APE teacher staffing.

Credentialed School Nurses

In 2023-24, the county office had 6.00 FTE credentialed school nurses, each of whom managed an average caseload of 930 students, as shown in Table 13 below.

Table 13: Credentialed School Nurse Staffing in 2023-24

Provider	Number of FTE	2023 Census Day Countywide Enrollment	Caseload Average	Industry Standard	Staffing Above (+) or Below (-) Industry Standard
School Nurse	6.00	5,578	930	1-to-2,274	+3.55 FTE

Sources: County office-provided data, CalEdFacts - Publications (CDE), and 2023-24 Enrollment for Charter and Non-Charter Schools - Siskiyou County.

The county office is staffed at 3.55 FTE above the industry standard for credentialed school nurses. However, because of the significant travel time between districts and schools in this relatively large county, the county office's staffing for credentialed school nurses cannot be compared to the industry standard. The county office needs to continue to review countywide enrollment, the assessment load, the number of districts and schools each school nurse is supporting, the travel time between them, school nurse duties, and student needs to determine if it needs to change school nurse staffing.

Occupational Therapy

In 2023-24, the county office did not employ any of its own occupational therapists but contracted with a nonpublic agency and independent contractors, who managed the cases of 115 students receiving direct services, as shown in Table 14 below.

Table 14: Occupational Therapist Staffing, 2023-24

Provider	Number of FTE	2023-24 Total Caseload	Caseload Average	Industry Standard	Staffing Needed to Meet Industry Standard
Occupational Therapist	N/A	115	N/A	1-to-45-55	2.56 FTE to meet 1-to-45 2.09 FTE to meet 1-to-55

Sources: County-office-provided data and industry standards.

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

If the county office could recruit and hire its own occupational therapists, it would need 2.56 FTE occupational therapists to meet the 1-to-45 occupational therapist-to-student ratio, or 2.09 FTE occupational therapists to meet the 1-to-55 occupational therapist-to-student ratio of the industry-standard range. Hiring occupational therapists is difficult because of the statewide staffing shortage, so the county office is contracting for occupational therapists and a certified occupational therapy assistant, which meets present student needs. The county office will need to continue to annually review occupational therapist caseload projections, the assessment load, direct and consultation service minutes, travel time and student needs to determine occupational therapist staffing.

School Psychologists

In 2023-24, the county office had 4.00 FTE school psychologists, each managing an average caseload of 1,394.5 students, as shown in Table 15 below.

Table 15: School Psychologist Staffing, 2023-24

Provider	Number of FTE	2023 Census Day Countywide Enrollment	Caseload Average	Industry Standard	Staffing Above (+) or Below (-) Industry Standard
School Psychologist	4.00	5,578	1,394.5	1-to-977	-1.71 FTE

Sources: County-office-provided data, CalEdFacts - Publications (CDE), and 2023-24 Enrollment for Charter and Non-Charter Schools - Siskiyou County.

The county office is staffed at 1.71 FTE below the industry standard for school psychologists, partly because a staff member performing the comprehensive role of a school psychologist changed positions midyear to fill a position aligned with their credential. Inadequate staffing could cause staff to be unable to meet special education assessment timelines, and it limits the work a school psychologist can perform outside of special education assessment in areas such as prevention and intervention, crisis preparedness and response, instructional support, schoolwide practice development to support learning and positive student behavior, support for social-emotional learning, data collection and analysis, counseling, and mental health interventions. The county office employs other staff, including a 1.0 FTE marriage and family therapist who provides counseling services, and 2.0 FTE behaviorists who perform part of the comprehensive role of the school psychologist. Despite this, to determine if it needs to increase school psychologist staffing to better align with industry standards and support district, school and student needs, the county office needs to review at least the following:

- 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 county and their support needs.
- Countywide student enrollment.
- Countywide special education enrollment.
- Individual district and school needs.
- Students' direct and consultation service minutes provided by a school psychologist.

Speech and Language Pathologists

Education Code 56363.3 establishes the maximum caseload for SLPs who serve students ages five to 22 at 55 students, while EC 56441.7(a) establishes a maximum caseload of 40 students for SLPs who serve preschool-age students exclusively.

Preschool and School-Age Blended SLP Staffing

In 2023-24, the county office had 6.4 FTE SLPs serving students in the infant, preschool and school-age programs. Each managed an average caseload of 52.81 students receiving direct services, as shown in Table 16 below. The county office employs 2.4 FTE of these positions and contracts with a nonpublic agency for the other 4.0 FTE.

Table 16: Infant through Grade 8 SLP Staffing, 2023-24

Provider	Number of FTE	2023-24 Total Caseload	Caseload Average	Industry-Standard Blended SLP-to-Student Ratio	Staffing Below (-) Industry Standard
Infant through Grade 8 SLP	6.4	338	52.81	1-to-47.5	-0.72 FTE

Source: County-office-provided data and EC 56363.3 and 56441.7(a).

Note: Only students receiving direct services from an SLP were included in the total caseload for comparison with the industry standard.

A blended average of the industry standards for preschool (1-to-40) and K-12 (1-to-55) was used (1-to-47.5) because the county office's SLPs serve both groups of students.

School-Age SLP Staffing

In 2023-24, the county office had 2.0 FTE SLPs serving school-age students; both were contracted through a nonpublic agency, and each managed an average caseload of 64 students receiving direct services, as shown in Table 17 below.

Table 17: School-age SLP Staffing, 2023-24

Provider	Number of FTE	2023-24 Total Caseload	Caseload Average	Industry Standard	Staffing Below (-) Industry Standard
School-age SLP	2.0	128	64	1-to-55	-0.33 FTE

Sources: County-office-provided data and EC 56363.3.

Note: Only school-age students receiving direct services from an SLP were included in the caseload average for comparison with the industry standard.

The county office is staffed 0.72 FTE below the industry standard for SLPs who serve students in the infant, preschool, and school-age programs, and 0.33 FTE below the industry standard for SLPs serving students in the school-age program only. The statewide shortage of SLPs contributes to the county office being staffed below the industry standard for SLPs. Adequate staffing allows county office SLPs to meet special education assessment timelines and provide students with both direct and consultation services. Given current staffing, SLPs are unlikely to be able to provide schoolwide support for language-related prevention and intervention. If SLPs were able to provide prevention and intervention services, it could reduce the need for special education identification.

The county office needs to increase SLP staffing so that its average caseload size is under the Education Code maximum and adequate to meet student needs. In addition, the county office needs to annually review SLP caseload projections, the assessment load, time spent on direct and consultation services, travel time, and student needs to determine if it needs to change SLP staffing.

Teacher for Students who are Deaf or Hard of Hearing

In 2023-24, the county office had a 0.6 FTE teacher for students who are deaf or hard of hearing. This teacher managed the cases of seven students who received direct services, as shown in Table 18 below.

Table 18: Teacher Staffing for Students who are Deaf and Hard of Hearing, 2023-24

Provider	Number of FTE	2023-24 Total Caseload	Caseload Average	Industry Standard	Staffing Needed to Meet Industry Standard
Teacher for Students who are Deaf or Hard of Hearing	0.6	7	7	1-to-15-25	0.47FTE to meet 1-to-15 0.28 FTE to meet 1-to-25

Sources: County-office-provided data and industry standards.

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

The county office needs a 0.46 FTE teacher to meet the 1-to-15 teacher-to-student ratio and a 0.28 FTE teacher to meet the 1-to-25 teacher to student ratio of the industry standard range. However, because the county office's teacher for students who are deaf or hard of hearing provides consultation for one student who has a long travel time between districts and schools in this relatively large county, current teacher staffing appears appropriate. The county office will need to continue to annually review caseload projections for this teacher position, the assessment load, direct and consultation service time, travel time, and student needs to determine staffing.

Teacher for Students who are Visually Impaired

In 2023-24, the county office had a 0.6 FTE teacher for students who are visually impaired. This teacher managed the cases of 15 students who received direct services, as shown in Table 19 below.

Table 19: Teacher Staffing for Students who are Visually Impaired, 2023-24

Provider	Number of FTE	2023-24 Total Caseload	Caseload Average	Industry Standard	Staffing Needed to Meet Industry Standard
Teacher for Students who are Visually Impaired	0.6	15	15	1-to-15-25	1.0 FTE to meet 1-to-15 0.6 FTE to meet 1-to-25

Sources: County-office-provided data and industry standards.

Note: Only students receiving direct services from the county office's teacher for students who are visually impaired were included in the total caseload and related calculations.

The county office needs a 1.0 FTE teacher to meet the 1-to-15 student-to-teacher ratio and a 0.6 FTE teacher to meet the 1-to-25 student to teacher ratio of the industry-standard range for teachers for students who are visually impaired. However, because this teacher provides consultation for six students and has a long travel time between districts and schools in this relatively large county, current teacher staffing appears appropriate. The county office needs to annually review caseload projections for the teacher for students who are visually impaired, the assessment load, direct and consultation service minutes, travel time, and student needs to determine if it needs to change staffing.

Recommendations

The county office 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. Review school psychologist staffing using at least the factors mentioned in the "School Psychologists" section of this report to determine if it needs to increase school psychologist staffing to better align with industry standards and support district, school, and student needs.
3. Increase SLP staffing so that the average caseload size is under the Education Code maximum and is adequate to meet student needs.

Appendix

Study Agreement

FCMAT

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
FOR MANAGEMENT ASSISTANCE

This study agreement, hereinafter referred to as Agreement, is made and entered into by and between the Fiscal Crisis and Management Assistance Team, hereinafter referred to as the Team or FCMAT, and the Siskiyou County Office of Education, 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.

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

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

2. Review the efficiency of staffing allocations of special education paraeducators, per Education Code requirements and/or industry standards, and make recommendations for improvement, if any. Review the procedures for identifying the need for paraeducators, including considerations related to the least restrictive environment and the processes for monitoring the assignment of paraeducators and determining the need for continued support from year to year (include classroom and 1-to-1 paraeducators).

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

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

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

6. Provide one day of on-site technical assistance to the county office's business services administration to better understand the Special Education Local Plan Area's (SELPA's) funding model.

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 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 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 $27,600.

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

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

5. **RESPONSIBILITIES OF THE CLIENT**

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

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

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

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

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

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

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

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

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

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

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

6. PROJECT SCHEDULE

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

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

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

	receipt of all documents and data requested.
Client comments on draft report	Within 10 business days of FCMAT providing a draft report to the Client.

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

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

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

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

FCMAT will commence work as soon as it has assembled an available and appropriate study team, taking into consideration other jobs FCMAT has previously undertaken, and 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, final report or making 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: Sarah Applegate, Associate Superintendent of Business Services

Telephone: (530) 842-8424

Email: sapplegate@siskiyoucoe.net

17. SIGNATURES

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

For Client:

Allan S. Carver Digitally signed by Allan S. Carver
Date: 2024.02.05 17:02:15 -08'00'

Allan S. Carver, Superintendent Date
Siskiyou County Office of Education

For FCMAT:

Michael H. Fine Digitally signed by Michael H. Fine
Date: 2024.02.06 10:09:10 -08'00'

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