



CSIS California School Information Services

Stanislaus County Office of Education

Special Education Review

September 21, 2011



Joel D. Montero
Chief Executive Officer







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Tom Changnon, Superintendent
Stanislaus County Office of Education
1100 H Street
Modesto, CA 95354

Regina A. Hedin
Stanislaus SELPA Director
1100 H Street #841
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Dear Superintendent Changnon and Director Hedin:

In July, 2011 the Stanislaus SELPA COE and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement to provide a review of the district's special education programs and services. Specifically, the agreement states that FCMAT will perform the following:

1. Review the current Stanislaus County SELPA structure with the Stanislaus County Office of Education (SCOE) as the Administrative Unit and analyze the pros and cons of having a district take over the AU duties of running the SELPA. Determine the fiscal and programmatic consequences, the timeframes for proper notification to the current AU and CDE, the processes and procedures necessary for any such transfer of the AU duties.
2. Review the current SELPA structure with regard to the delivery of Regionalized Programs and Services. Determine the fiscal and programmatic consequences of having a school district assume responsibility (take-back) the running all 33 RP currently run by the SCOE. Specifically identify the pros and cons of such a take-back. Additionally, determine what steps are necessary to take for effective transfer of program operation/delivery from SCOE to a district run operation.
3. Analyze the present AB 602 funding model, and make recommendations, if necessary, that would make the formula more equitable, in both the current SELPA structure and if a district was the AU of the SELPA.
4. Analyze the present Fee for Service funding model, and make recommendations, if necessary that would make the FFS model more equitable for all districts, in both the current SELPA structure and if a district was the AU of the SELPA.
5. Review student caseload status of the 9 regional operating programs and the fiscal effects of their operations.

FCMAT

Joel D. Montero, Chief Executive Officer

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6. Review COE special education operated programs and determine whether some programs would be more cost-effective if operated by participating districts.
 - a. Determine the capacity of districts to operate additional programs (such as facilities, staffing etc.)
7. Review all current staffing levels for certificated and classified employees, including management level and caseloads per full time equivalent (FTE) position of all COE programs and make recommendations regarding efficiency.
8. Analyze COE special education classified and certificated staffing formulas and caseloads, salaries and benefits and compare with legal requirements, statewide averages and county averages.
9. Perform a fiscal review of the cost of special education programs, with the intent of developing a “defendable professional standard” or baseline for staffing and providing services per program offered by the COE’s Special Education Department.
10. Evaluate and recommend staffing ratios of all special education support staff including but not limited to school psychology, speech, occupational, adaptive PE, and occupational therapists based on “defendable professional standards.”
11. Review the SELPA policy and procedures for providing Para-professionals; including staffing ratios to determine whether the process is cost effective and make recommendations to improve efficiency and effectiveness.
12. Conduct a review and analysis, and provide recommendations for the county special education program operation and service delivery including but not limited to:
 - The efficiency and effectiveness of the county office’s special education fiscal and program delivery system.
 - Legal costs and due process at the SCOE and district level, determine costs involved.

This report details the study team’s findings and recommendations.

On behalf FCMAT, we appreciate the opportunity to serve you and extend our thanks to all the staff of Stanislaus County Office of Education and the school districts of Stanislaus County and SELPA for their cooperation and assistance during fieldwork.

Sincerely,



Joel D. Montero
Chief Executive Officer

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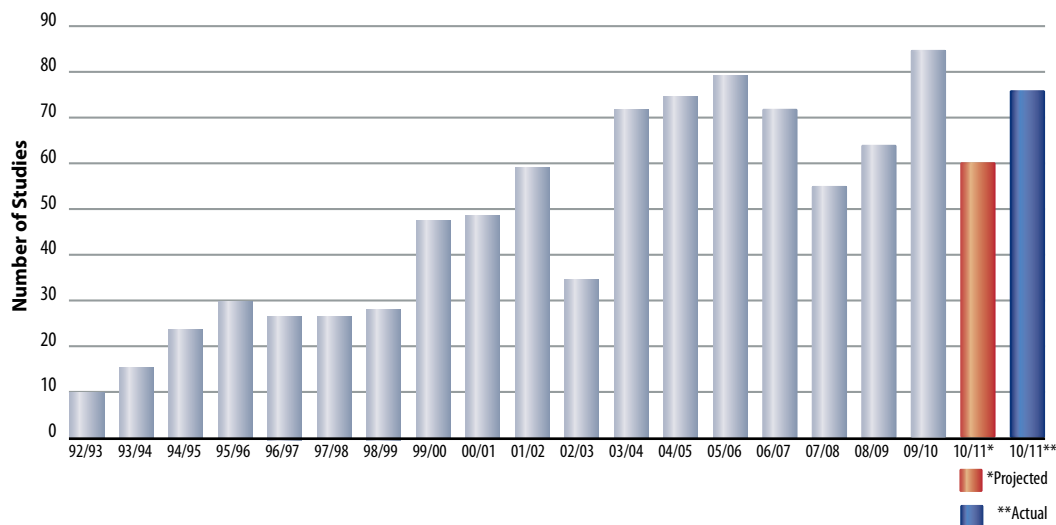
About FCMAT

FCMAT’s primary mission is to assist California’s local K-14 educational agencies to identify, prevent, and resolve financial 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 and efficient operations. FCMAT’s data management services are used to help local educational agencies (LEAs) meet state reporting responsibilities, improve data quality, and share information.

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 local education agency to define the scope of work, conduct on-site fieldwork and provide a written report with findings and recommendations to help resolve issues, overcome challenges and plan for the future.

Studies by Fiscal Year



FCMAT also develops and provides numerous publications, software tools, workshops and professional development opportunities to help local educational agencies operate more effectively and fulfill their fiscal oversight and data management responsibilities. The California School Information Services (CSIS) arm of FCMAT assists the California Department of Education with the implementation of the California Longitudinal Pupil Achievement Data System (CALPADS) and also maintains DataGate, the FCMAT/CSIS software LEAs use for CSIS services. FCMAT was created by Assembly Bill 1200 in 1992 to assist LEAs to meet and sustain their financial obligations. Assembly Bill 107 in 1997 charged FCMAT with responsibility for CSIS and its statewide data management work. Assembly Bill 1115 in 1999 codified CSIS’ mission.

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

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

Since 1992, FCMAT has been engaged to perform nearly 850 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 Joel D. Montero, Chief Executive Officer, with funding derived through appropriations in the state budget and a modest fee schedule for charges to requesting agencies.

Introduction

The 25 school districts in Stanislaus County have experienced severe state budget decreases over several years with little expectation of improvement in the near future. As a result, superintendents are evaluating every program for possible cost savings. Special education has consistently and increasingly required a contribution from districts' general funds because the program is consistently underfunded at the federal and state levels. Because state and federal laws require districts to provide a free, appropriate, public education (FAPE) to every eligible disabled student, it is also a mandated program.

These difficult fiscal times have prompted many districts to implement furlough days, salary reductions and staff reductions. School district administrators consistently indicated during interviews that county office employees had not experienced reductions in salaries, benefits, and work years similarly to the districts. This independent study developed by the Fiscal Crisis and Management Assistance Team (FCMAT) was designed to examine the issues associated with special education delivery in Stanislaus County and provide recommendations and guidelines that could benefit the districts.

Through mutual agreement with the Stanislaus County and SELPA, a FCMAT study was requested to provide an independent assessment of fiscal, staffing and program transfer options to address current budgetary concerns. The study agreement between the FCMAT and the county office requests that FCMAT perform the following:

1. Review the current Stanislaus County SELPA structure with the Stanislaus County Office of Education (SCOPE) as the Administrative Unit and analyze the pros and cons of having a district take over the AU duties of running the SELPA. Determine the fiscal and programmatic consequences, the time-frames for proper notification to the current AU and CDE, the processes and procedures necessary for any such transfer of the AU duties.
2. Review the current SELPA structure with regard to the delivery of Regionalized Programs and Services. Determine the fiscal and programmatic consequences of having a school district assume responsibility (take-back) the running all 33 RP currently run by the SCOPE. Specifically identify the pros and cons of such a take-back. Additionally, determine what steps are necessary to take for effective transfer of program operation/delivery from SCOPE to a district run operation.
3. Analyze the present AB 602 funding model, and make recommendations, if necessary, that would make the formula more equitable, in both the current SELPA structure and if a district was the AU of the SELPA.
4. Analyze the present Fee for Service funding model, and make recommendations, if necessary that would make the FFS model more equitable for all districts, in both the current SELPA structure and if a district was the AU of the SELPA.
5. Review student caseload status of the 9 regional operating programs and the fiscal effects of their operations.

6. Review COE special education operated programs and determine whether some programs would be more cost-effective if operated by participating districts.
 - a. Determine the capacity of districts to operate additional programs (such as facilities, staffing etc.)
7. Review all current staffing levels for certificated and classified employees, including management level and caseloads per full time equivalent (FTE) position of all COE programs and make recommendations regarding efficiency.
8. Analyze COE special education classified and certificated staffing formulas and caseloads, salaries and benefits and compare with legal requirements, statewide averages and county averages.
9. Perform a fiscal review of the cost of special education programs, with the intent of developing a “defendable professional standard” or baseline for staffing and providing services per program offered by the COE’s Special Education Department.
10. Evaluate and recommend staffing ratios of all special education support staff including but not limited to school psychology, speech, occupational, adaptive PE, and occupational therapists based on “defendable professional standards.”
11. Review the SELPA policy and procedures for providing Para-professionals; including staffing ratios to determine whether the process is cost effective and make recommendations to improve efficiency and effectiveness.
12. Conduct a review and analysis, and provide recommendations for the county special education program operation and service delivery including but not limited to:
 - The efficiency and effectiveness of the county office’s special education fiscal and program delivery system.
 - Legal costs and due process at the SCOE and district level, determine costs involved.

Study Team

The study team was composed of the following members:

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*As members of the study team, these consultants were not representing their employers but were working solely as independent consultants for FCMAT.

Study Guidelines

FCMAT visited the district on July 25-29, 2011 to conduct interviews, collect data and review documents. This report is the result of those activities

Executive Summary

The superintendents' council of the Stanislaus County Special Education Local Plan Area (SELPA) has expressed concerns over increasing costs to support special education programs and services provided by the Stanislaus County Office of Education. Programming quality is not an issue in this county; however, the participating districts are concerned about rising special education program costs using the fee-for-service model at a time when they have had to significantly reduce their budgets. In this model, the county office operates moderate to severe programs, with individual districts contributing fees based on the number of enrolled students. Fees to local districts have risen as a result of increased costs to the county office.

Total compensation for a county office teacher and a teacher in two of the county's largest districts differs by an average of \$12,851 because of salary and benefit increases for the county office staff. The county office should work toward a total per diem compensation similar to the salary schedules in the two largest districts in Stanislaus County. As districts continue to make budget reductions using furlough days and significant staffing decreases, the difference in total compensation will only increase. The superintendents' council has initiated the notification process for transferring special education programs and the administrative unit (AU) to a district in the Stanislaus SELPA to realize an estimated savings of \$2.5 million. However, no decisions have been made regarding which district will assume responsibility for these programs.

The Stanislaus County SELPA operates as a joint powers authority (JPA) with the county office serving as the AU. There is much confusion in the SELPA over the AU's role and which entities can serve in that capacity. FCMAT has defined the roles and responsibilities of the AU and determined that any member district or county office can serve in that capacity. Most importantly, FCMAT clarified that the local educational agency operating the programs for the moderate to severe population and operating as the AU are two separate and distinct functions. The decision regarding which district or the county office will serve as the Stanislaus County SELPA AU will be made by the superintendents' council.

Over the past few years, Stanislaus County districts have increasingly assumed responsibility for programs serving moderate to severe populations. Regardless of the organizational structure, there is significant support for using a fee-for-service model to fund regional programs. The original intent of this model was to control external excess costs. However, member districts lack trust in the current fee-for-service model and as a result, overall confidence in this model is low.

FCMAT reviewed the fiscal and programmatic consequences of program transfer from the county office to a member district and will provide the superintendents' council with five options for programs and service providers. The pros and cons of each option are included to provide the council with the necessary background for making a decision. The steps for successful transition of programs are also provided.

Since the SELPA operates with a fee-for-service model, fiscal resources accrue to the districts, which may choose to serve all of their disabled students or arrange with another district or the county to provide them with a fee-per-child agreement. Fiscal resources are equally allocated per ADA or per child served in the prior year. The rates are equal, but that does not ensure the allocation model is equitable since there is no provision to consider intrinsic factors that can influence program costs such as demography, geography, and socioeconomic conditions. Little consideration is given to the creation of funding pools to provide for unforeseen situations. These

may include children with extraordinary excess costs associated with their needs or the impacts of new arrivals to programs with high populations. The SELPA should review its allocation of resources for possible inequities.

The current county office indirect cost fee is 9.85%, which is the average among Class 3 county offices in the state. This percentage could be lowered through negotiation process.

County office programs are staffed at lower student-to-teacher ratio lower than the recommended standards for program efficiency. This is largely due to regional SELPA standards that offer less flexibility than those in other districts across the state and are supported through certificated contract language. Negotiated contract language also limits the maximum caseload for speech and language pathologists to considerably less than the state's standard of 55 established in the California Code of Regulations Section 5 3051.1(b) . Maintaining staffing patterns at this level adds to increased program operation costs, which are transferred to districts through the fee-for-service-model.

The county office's administrative ratio of support far exceeds the level provided by the two largest SELPA districts. If programs transfer, appropriate adjustment will need to be made. In a comparison to similar county offices, FCMAT found that the Stanislaus County Office is over-staffed in management and clerical support. Reductions could be made to align the county office management structure to comparable counties such as the Fresno, Sonoma and Solano county offices for a total projected annual savings of \$281,554.

The difference between teachers and specialists for 51 classes identified for transfer in the two largest districts (Ceres and Turlock) and the county office is projected to be \$947,884 in total average compensation annually. This includes classroom teachers and designated instruction providers in areas such as speech, adapted physical education (APE), deaf and hard of hearing (DHH) services, etc. Some districts have expressed an interest in maintaining programs with the county office; however, the difference in salaries between the districts and county office would have to be addressed.

FCMAT found that as a result of collective bargaining agreements and an insufficient number of cost-efficiency reviews, program and service costs tend to be inordinately higher than those provided by the districts. The county office has also taken few steps to respond to the fact that the districts are experiencing state funding decreases of 20% and more.

Overall, this study provides the superintendents' council with several options for program transfer. The data suggests that SELPA member districts would reduce fee-for-service costs by a projected average of \$3,517,048 annually by transferring moderate to severe programs from the county office to either the Ceres or Turlock districts. The county office could reduce the compensation difference between district and county office certificated salaries for a significant savings. This would require continued discussion among the districts and the county office to determine the best solution.

Findings and Recommendations

Administrative Unit

The Stanislaus County Special Education Local Plan Area (SELPA) operates as a joint powers authority with the Stanislaus County Office of Education acting as its administrative unit (AU). In that capacity, the county office performs functions such as receiving and distributing funds, providing administrative support, and coordinating the implementation of the SELPA local plan.

The SELPA AU role should not be confused with that of the district or county office, which provide direct instructional programs and services on a regional basis. Any member district may also provide regional services to students under the SELPA local plan. The Stanislaus County Office operates regional special education programs for moderately to severely disabled students and fulfills the role as AU for the SELPA, but these are two separate and independent functions. Statewide, some SELPAs choose to provide direct instructional services but this is not common. FCMAT found that SELPA members frequently did not understand the distinct roles and responsibilities of a SELPA and the AU.

There was some discussion in the SELPA governance council regarding the SELPA serving as the AU and operating special education programs. Although a SELPA cannot be the AU, any member district can assume the AU's responsibilities for the SELPA. The AU does not generally operate instructional programs and services, but the agency serving as the AU may provide them. Consequently, county-office-operated special education programs could transfer to one or more districts while the county office remains the AU. Another option is for programs to remain with the county office and a district to assume the role of AU. Yet another possibility is for programs to be operated by the county office and the AU to transfer to a district.

The SELPA AU staff members are county office employees who are paid in accordance with the county office salary schedule. An AU transfer would mean that the SELPA staff members would come under the new AU's contract and salary/benefit package. A SELPA policy requires the AU to be housed by the SELPA, and this issue would need to be addressed if a transfer occurred.

The SELPA AU's responsibilities fall under the following broad categories. However The SELPA carries out most of these responsibilities.

Fiscal

The AU employs the SELPA director and all the SELPA staff. It receives and distributes state and IDEA special education funds per the SELPA's local plan. The AU also receives and distributes specialized resources such as low incidence and regionalized services/program specialist funds. The AU is also responsible for ensuring these funds are expended legally, subject to an annual independent audit. The SELPA AU is required to complete and submit an annual budget and service delivery plan for the SELPA as adopted at a public hearing. (Ed. Code 56205(b))

State and Federal Reporting

The AU coordinates and ensures appropriate data collection and management. This includes maintaining a special education management information system, such as the Special Education Information System, to create and submit required federal and state pupil-related reports in a

timely, accurate and complete manner. These reports include December 1 and June 30 reporting for the California Special Education Management Information System and the September 30 behavior emergency report to the California Department of Education (CDE).

Interagency Agreements

The AU is required to ensure that interagency agreements are current and complete as required by state and federal law. SELPAs are required to maintain interagency agreements with county mental health, California Children's Services, Head Start, and the regional center. The AU also has to coordinate services to medical facilities, licensed children's institutions (LCI) and foster family homes.

Compliance Monitoring

All LEAs have the responsibility of following state and federal law as a condition of receiving special education funds. However, the SELPA AU, as the grantee, has special duties regarding the ongoing review of programs and procedures to identify and correct problems and ensure a full educational opportunity according to Education Code Section 56195.7 (c) (6). The SELPA AU is responsible for coordinating the SELPA and implementing the local plan. The SELPA director is required to work with the member LEAs to develop policies and procedures that comply with state and federal laws and regulations such as identification and assessment, a system of procedural safeguards, curriculum development, and alignment with the core curriculum, which are incorporated into the local plan. Coordinating a system of internal program review, evaluating the effectiveness of the local plan, and implementing an accountability mechanism are also duties of the SELPA AU.

Staff Development

The SELPA AU is required to develop a comprehensive plan for staff development. The Education Code specifically refers to training in emergency behavioral intervention and the SELPA's requirement to certify behavior intervention case managers. The SELPA AU is required to support and work with a community advisory committee (CAC) for special education.

Other responsibilities of the SELPA AU include coordinating transportation services for individuals with exceptional needs, career and vocational education and transition services.

The pros and cons of transferring the AU to a SELPA member district are as follows:

Pros

- It could reinforce the AU's independence. The superintendents' council should consider this factor to maintain the AU's neutrality in the SELPA.
- It would essentially mean a fresh start, enabling a review of practices that could lead to changes in policies and procedures.
- It may increase trust and openness in the SELPA. This is an extremely important factor and was discussed by numerous interviewees throughout this study.

Cons

- The SELPA would be further removed from the county office as the intermediate educational unit through which financial and other transactions occur for districts throughout Stanislaus County.
- If SELPA staff chooses to remain with the county office or find employment elsewhere because of the AU's transfer, the SELPA may be left with untrained or inexperienced staff.
- An AU transfer may perpetuate a loss of county office expertise. The county office has experience with receiving and distributing special education funding.
- An AU has a role and performs a variety of functions that are unfamiliar to most school district board members
- Throughout FCMAT's interviews, some districts expressed concerns about transferring the AU to a district because they are satisfied with the county office's performance in providing special education services.

Also important in deciding who will act as AU is the potential for neutrality or bias. The process for distributing funds should be open. Establishing and maintaining trust is one of the most important factors in a SELPA.

Administrative Unit Transfer Time Line

Another important factor for an AU's transfer to a member district is the time line for proper notification and procedures. No SELPA policy specifically addresses an AU transfer in the Stanislaus County SELPA. Having a policy would assist member districts with the basic understanding of the AU. A letter submitted June 27, 2011 to the county superintendent (attached as Appendix A to this report) indicated that on "June 17, 2011, the Stanislaus SELPA Superintendents' Council voted to proceed with a possible transfer of the AU and Special Education programs that are currently operated by the SCOE to a SELPA member district commencing July 1, 2012."

The SELPA is required to notify the CDE of an AU transfer five months in advance so that special education funding can be disbursed to the new AU in a timely manner. An AU change also requires the SELPA's local plan to be rewritten with the approval of all member district school boards. The SELPA would continue to assist with AU responsibilities.

Recommendations

The superintendents' council should:

1. Thoroughly review the SELPA AU responsibilities with the member districts to ensure complete understanding.
2. Ensure that the districts understand that the SELPA will continue to assist with AU responsibilities.
3. Discuss the pros and cons of a district assuming AU duties before considering the transfer of the AU.

4. Consider the time line and planning required to complete an AU transfer.
5. Determine whether the AU should remain with county office or one of the SELPA districts.
6. Ensure that whoever serves as the AU is able to maintain neutrality in the SELPA.
7. Notify the CDE at least five months in advance if the council decides to transfer the AU to a member district.

Fee-for-Service Model

Many factors can make a fee-for-service model more equitable for all member districts, whether the structure remains the same or the AU is transferred. The SELPA policy “Fee for Service for Regional Providers (FFS)” indicates that fees are charged monthly. The amount will be charged according to the fee-for-service schedule per student placed in a regional special day class or receiving designated instructional services (DIS) from a regional provider. Each regional provider will establish their fee-for-service schedule by March 1 of the prior year. The policy states that these fees may be revised three times per year on November 1, February 1, and April 15. At the close of the fiscal year, the fee is adjusted to reflect actual expenses and student enrollment. Any necessary adjustments are charged or credited to the fiscal year in which they occurred, which is referred to as a true up/reconciliation process. Fee-for-service payments are calculated based on the fee-for-service schedule submitted by regional providers.

The fee for service may include the following:

Reimbursable Services	
Administration	Classified staff
Clerical staff	Certificated staff
Instructional supplies	Books
Equipment	Printing
Network services facilities	Field trips
Legal costs	Assessments
Hearing screening	CBI transportation
Mileage	Nursing services
Communications	Indirect costs
LVN	Autism specialist
Behavior intervention case managers	DHH interpreters – unless 1-to-1
Audiological services	Staff training

- Like other comparable SELPAs in the state that have moved to a full or modified fee-for-service model, the Stanislaus County SELPA opted for this approach to satisfy districts’ concerns regarding an increasing level of year end “bill-backs” from the county office for providing services to disabled students. The model was intended to strengthen the districts’ control over these external costs, and when the economic environment is healthy, it seems to accomplish that goal.
- Interviews with district administrators indicated there is a lack of trust between some SELPA superintendents’ council members and the county office. Ineffective communication between the county office and some member districts is exacerbated by

a lack of openness regarding detailed program and staffing information and the actual costs of operating programs. The county office does not provide SELPA superintendents' council members with regular program and staff cost breakdowns of programs operated on the districts' behalf. Understandable, clear and concise fiscal data and information should be regularly provided. Since county office programs are funded using the fee-for-service model, the districts should know what is included in the operation of programs and services. Further breakdown of costs is necessary to demonstrate openness and build trust among members.

- With K-12 school districts in California in the middle of a fiscal crisis, it is crucial for the SELPA's local educational agencies to know the exact operational cost of county office programs to ensure efficiency. This is a priority for all participating districts. Member districts are not included in decision-making for programs operated by the county office.
- The Ceres, Turlock, and Sylvan school districts began providing regional programs and services on a fee-for-service basis and were subsequently joined by the Empire, Patterson, Stanislaus Union, and Oakdale districts. However, the fee-for-service levied by the county office was significantly higher than those of the districts for serving the same type of severely disabled student. Many member districts indicated that if the county office cannot address this fee difference, it may be necessary for one or more SELPA members to assume responsibility for all programs currently operated by the county office.
- While many districts interviewed by FCMAT indicated that issues involving the county office could improve without a program transfer, they also emphasized that changes will be necessary. (The specific provision options are outlined later in this report.) Cost guidelines should be included in calculating a service fee, but at present, there is little fiscal oversight or negotiation for regional service fees.
- The districts that assumed responsibility for moderate to severe programs also indicated that the transferred students and their families participated in school activities, and other pupils benefitted from interaction with them. Districts also take greater pride in serving more of their own students.
- Regardless of the organizational structure, support for using a fee for service is significant.
- Member districts reported that the fee-for-service model used by the county office and districts providing regional programs needs to be more specific, include fiscal data, and be thoroughly itemized. The information submitted for reimbursement to the SELPA sometimes does not include the following information:
 - The total number of full-time equivalent (FTE) positions and the specific position title.
 - Each regional services provider, a list of specific services, and the designated instructional service (DIS) provided to the students.
 - A list of specific equipment purchased such as lifts, printers, copiers, etc.
 - A list of specific supplies and materials purchased such as toner cartridges, paper, books, etc.

FCMAT determined that the fee-for-service model does not establish standardized levels for regional providers in the following areas:

- Standards alignment.

- Staffing ratios and class loadings for each type of classroom (e.g., autism, emotional disturbance, severe handicap) that are strictly adhered to throughout the SELPA.
- Equipment replacement. For example, all copiers may be replaced every four years instead of having one service provider replace some copiers every two years and another every three years. The practice should be consistent and uniform throughout the SELPA.
- Travel and conference for regional providers, for example, a certain amount that is not to be exceeded per staff member or program annually.

Although the SELPA has a business and program committee, it could form a joint oversight committee or change the role of the business and program committee to establishing and monitoring submissions for reimbursement of the fee for service. This committee would monitor the effectiveness and equitability of the fee-for-service model and participate in developing any fiscal charges. This body could ensure the overall cost-efficient use of resources throughout the SELPA and would be chaired by the SELPA director.

A difficult situation for all program operators is the enrollment of a new student that exceeds the program standard. This necessitates a discussion regarding cost and appropriate programming.

Recommendations

The superintendents' council should:

1. Increase openness regarding the fee-for-service model including fiscal accountability to help build trust among members.
2. Ensure the fiscal and program information submitted is specific and itemized when districts submit for reimbursement under the fee-for-service model.
3. Establish standardized levels and alignment for regional providers. Using recommended standards from such entities as School Services of California Inc. and surveys of practices in other comparable SELPAs, the council should develop defensible standards to maximize the cost-efficiency of programs and services.
4. Work with the county office to align its fee-for-service model with the district members' fee for service model.
5. Consider forming a joint oversight committee or adjust the role of the business and program committee to monitor the effectiveness and equitability of the fee-for-service model.
6. Consider developing plans to fiscally support the need for new classes without significantly affecting service fees.

The county superintendent should:

7. Consider taking the initiative to clearly express an understanding of the districts' fiscal position and investigate ways to respond to their concerns regarding the difference between the district and county office teacher salary and benefit compensation schedules.

8. Meet with the districts, emphasize that the county office understands their fiscal situations, and request district suggestions to reduce the fiscal impact of county office fees.

The county office should:

9. Establish trust by developing and implementing a process to negotiate the fee for service funding model with member districts.
10. Explain to staff that any concessions made to reduce costs during this economy may help retain county office programs, enhancing their ability to remain as county office employees.
11. Develop a clearly understandable format for reporting the factors behind service fees. The county office should establish defined caps on total salary and benefit compensation increases, and regional service providers that exceed them should exclude the excess in calculating the fee. It should be understood that the fees are negotiable and not unilaterally established by the regional service provider.

Program Delivery and Transfer Options

SELPA Program Structure

In each of the various configurations, students that live in the SELPA are required to have access to the full range of program options as required by Education Code 56205. (a) as follows:

Each special education local plan area submitting a local plan to the Superintendent under this part shall ensure, in conformity with Sections 1412(a) and 1413(a)(1) of Title 20 of the United States Code, and in accordance with Section 300.201 of Title 34 of the Code of Federal Regulations, that it has in effect policies, procedures, and programs that are consistent with state laws, regulations, and policies governing the following: (1) Free appropriate public education and (2) Full educational opportunity.

The Stanislaus County SELPA has provided a range of services to meet the mandate using regional programs through its participating members.

The SELPA has eight regional program providers of services such as special day classes and designated instructional services (DIS). These providers are the Ceres, Empire, Oakdale, Patterson, Stanislaus Union, Sylvan and Turlock districts as well as the Stanislaus County Office of Education. These programs are all funded through a constructed fee-for-service model that began in 1999.

A SELPA procedure clearly specifies the districts served by a regional provider for each program. The district regional providers primarily serve their own students as well as pupils from their region upon referral. A regional program referral is outlined in Section 2 of the SELPA's policies and administrative regulations. However, according to the staff, the process does not clearly define the following:

- The eligibility criteria for regional programs.
- What a referring district must provide for a student prior to referring.
- What must be provided to the regional provider in a referral packet.
- A process for resolving disagreements regarding the appropriateness of a referral.

A variety of program configurations located throughout the state serve students with more intensive needs such as those served by the county office. Programs are provided by the county office, one district, individual districts for their students, or SELPA member districts for other SELPA members districts,

Except for court and community schools and charter schools authorized by the county board of education, a county office is not a district of residence. Therefore, the students served in a county office program are ultimately the responsibility of the student's district of residence. In the same manner, students served by a district regional program who are residents of another district are the responsibility of their district of residence.

Although out-of-district students are the responsibility of their district of residence, staff members indicated that when districts operate regional programs, they carefully monitor all aspects of the program including staffing, curriculum, compliance and due process issues. This is because most of the class's students belong to the district that operates the program. When the county office operates a class, the students belong to their districts of residence and not the county office.

Districts that send students to regionalized programs and districts that operate these programs indicated that it is sometimes difficult to coordinate individualized education program (IEP) meetings and obtain the necessary services, equipment or assessments.

Fiscal & Programmatic Consequences of Program Transfer

Stanislaus County SELPA districts began discussing a transfer of all county-office-operated programs to one of its member districts because of significant increases in the fee-for-service costs to districts. The districts had ongoing concerns about the costs of the county office's moderate to severe programs. On May 19, 2011, the county superintendent of schools presented information to the SELPA superintendents' council regarding the magnitude of a transfer and its consequences for local districts. FCMAT found that these issues are all valid and could have a significant impact on a district assuming responsibility for these programs.

A major consideration is that a district or districts providing regional programs and services would experience an accelerated outflow of cash with considerably delayed recoupment that would be compounded by the increased cash deferrals from the state. Program operation and associated cost could prompt serious cash shortages by November or December of the fiscal year. Cash does not drive the budget certification. A district could have a positive budget certification with little or no cash and borrow needed cash utilizing Tax Revenue Anticipation Notes (TRANS) with no impact on the district's budget certification.

To avoid or minimize this situation, a regional provider could require districts to pay that month's fee and an advance on future fees. However, this type of practice may put the participating districts in a negative cash position. Cash-flow issues are the biggest cause of fiscal crises among school districts and should be avoided to sustain a district's financial solvency.

The county office can compensate for this type of cash shortfall because its funding resources have differing flow schedules. The county office could assist during cash flow shortages, and this possibility should be explored if it cannot reduce its fees for service, and regional programs and services are transferred to a district or districts. If that option is not available, the SELPA as a JPA could explore the possibility of securing a short-term loan.

If the cash-flow problem cannot be resolved, FCMAT cannot recommend the transfer of a number of regional programs and services from the county office to a district or districts. The possible consequences of a transfer are as follows:

Consequences from the County Office Perspective

- The impact of a transfer of approximately 400 employees to the district's human resources, payroll and other district staff.
- The potential for increased litigation costs.
- The capacity to provide paraprofessionals and teacher substitute coverage.
- The need to establish safety programs to control and mitigate workman's compensation claims.
- The need to ensure all staff members are fully credentialed.
- The need for the program provider to have the necessary cash reserve or ability to borrow sufficient funds to cover costs.

Consequences from the District Perspective

- Savings in the indirect cost rate to districts from the county office.
- More students will be educated in their home/district schools.
- Cost savings in the fee-for-service charges to member districts.
- Cost savings in total compensation to teachers.

Changing indirect costs and decreasing the credentialed compensation package could reduce the total fee-for-service budget by more than \$1.6 million or approximately 8.3%. Although this would be a reduction for all member districts, FCMAT suggests a total decrease that is closer to 20% or \$4 million. The county office should revise its budget and revenue expectations to incorporate a reduction of 20% in fee-for-service revenue from the districts.

The current county office indirect cost fee is 9.85%, which is the average among Class 3 county offices in the state.

Options for Program Transfer: Pros and Cons

FCMAT reviewed several program transfer options, including maintaining the programs with the county office. SELPA member districts clearly indicated they prefer this option if fees can be adjusted to more closely align with those of other regional providers.

Additional significant reductions in the county office budget are possible when loading factors and staffing factors are calculated. The savings in these two areas are included in a later section of this report.

OPTION ONE: Maintaining the programs at the county office with reduced costs of approximately 20%.

Pros

- This option would be the least disruptive to students, parents and staff.
- The SELPA member districts are familiar with the county office and generally pleased with the programs.
- The county office has extensive knowledge in operating daily programs and providing support services such as substitutes, hiring, credentials, etc.
- Districts are comfortable with the county office's referral process and expectations.
- The costs incurred by districts for students in county office programs will be more similar to those of district-operated regional programs.
- The responsibility for reductions will be shared by all SELPA entities.
- All SELPA districts will benefit financially from cost reductions.

Cons

- Districts indicated that there a lack of trust in how the county office fiscally operates the special education programs.
- SELPA member districts have little or no control of their students in county office programs.
- Some SELPA member districts expressed concern that any significant reductions made by the county office will be temporary. Increases in the following years could revive interest in a program transfer.

OPTION TWO: Individual districts assume responsibility for any students they can serve and start new regional classes for those with disabilities such as autism, leaving the remaining classes with county office at the current fee-for-service rates.

Pros

- Keeping many of the programs with the current provider would be the least disruptive to students, parents and staff.
- The SELPA member districts are familiar with the county office and generally pleased with the programs.
- The county office as has extensive knowledge of operating daily programs and providing support services such as obtaining substitutes, hiring, handling credentials, etc.
- Districts are comfortable with the county office's referral process and expectations.
- A greater number of students would be educated by their district of residence, and this would occur closer to home in some cases, reducing travel time.
- The concept of least-restrictive environment requires students to be educated with their nondisabled peers and in their home districts and home schools whenever possible. This would pertain to any students returned to a district program.
- Districts would have more control over the curriculum and general program for those specific students and programs.
- Newly formed regional programs would create opportunities for students and staff members to be integrated into the school they attend.
- Classes transferred would be regional and therefore available to all districts in the region of the district operating the classes.
- The quality of regional programs for autism is considered equal to that of county office programs.
- Districts whose students attend a regional and not a county office class would experience a fee reduction for those students.

Cons

- There is no reason to transfer individual students that can be served by their district of residence.
- When additional classes are transferred, the cost of operating the remaining classes would likely increase under county office fee-for-service rates.
- According to the SELPA guidelines, access to the transferred classes is only for students in the region of the district that will operate the classes. Therefore, some students in the SELPA may lack access to the full range of services as required.
- Additional classes may be necessary for students that lack access to the regional class, but continue to need that level of program.
- Although county office teachers have rights of employment under program transfer, some teachers, administrators and other designated instruction providers may choose not to transfer.
- Travel time for students that cannot access the regional program may be increased.

- The SELPA member districts have little or no control of their students in the county office programs.
- SELPA member districts have a little trust in how the county office fiscally operates the special education programs.

OPTION THREE: Individual districts assume responsibility for any county office class housed in their district, and these become regional. If the district housing a class is unable to provide the necessary infrastructure or support, one of the two largest SELPA districts would become the program operator.

County office regional classes are located in the Ceres, Salida, Sylvan, Empire, Stanislaus Union, Hart-Ransom, Waterford, Riverbank, and Turlock districts. Waterford and Hart-Ransom are the only districts that house county office classes but are not district regional providers. The locations of these county office classes is shown in the following table. Thirteen SELPA districts are not regional providers and do not house a county office class. These districts refer students to both district regional and county office programs.

Location of County Office Classes in the SELPA

District	Number of county office classes in district
Ceres	18
Empire	4
Hart-Ransom	2
Riverbank	3
Salida	5
Stanislaus Union	4
Sylvan	7
Turlock	1
Waterford	1

Pros

- Several students in the county office class are likely from that district. Therefore, the students would be served in their district of residence, by their district and not a second party.
- Students' in these regional classes would have access to the district's curriculum and opportunities for integration. These are often not available to students in a county office program housed in a district.
- Class locations likely would not change.
- County office teachers have the first right of employment and therefore many teachers will continue with their current assignments.
- Credentialed and classified staffs transferring to the district have experience working with their students and in that district.
- County office teachers will become district teachers and therefore part of the faculty instead of guests on campus.

- Most districts that house county office programs have experience in assuming responsibility for classes transferred from the county office and in providing appropriate services.
- Site administrators would be responsible for and involved with the students in these classes.
- The transferred classes would be regional and therefore available to all districts in the region of the district operating the classes.
- Based on current regional program fees, the cost for the students in the newly formed regional programs will be less than the amount charged by the county office, resulting in a cost savings for all SELPA districts.

Cons

- Before implementing this option, the SELPA superintendents' council and county office would have to address the cash flow problem that would affect all SELPA districts and is addressed above in this report.
- Smaller districts that house county office classes may not have the infrastructure or knowledge to operate the programs housed in their districts.
- Dealing with hiring, payroll, credentials, etc. may be an undue burden to any of the districts housing county office programs.
- Transferring students to a number of districts instead of only one is more complicated and confusing for staff and families.
- Teachers in these classes will be more involved with their sites, but more isolated from their job-alike peers.
- There is a greater likelihood of program differences because of the lack of coordination when several districts provide programs.
- Although county office teachers have rights of employment under program transfer, some teachers, administrators and other designated instruction providers may choose not to transfer, leaving openings that are difficult to fill.
- Because salary compensation packages vary between districts, county office staff members may choose to transfer to a different program in a higher-paying district.
- The SELPA's policy is for regional program providers to operate programs for all the districts in their region. This would need to be amended so that SELPA students have access to the programs similarly to the access they have under the county office.
- Additional rental agreements between districts and the county office would sometimes be required. Classes will need to be moved in some cases, and the district will no longer need rental agreements in others.
- The cost for the new classes in the new county office building will need to be negotiated.

OPTION FOUR: One of the two largest districts serves as the AU and administers the county office classes with the programs under the “umbrella of the SELPA,” rather than as a district.

In this option, administration support is maintained separately from program operation. The SELPA director would have the dual function of SELPA director and special education director, and the compensation package for this position would be divided between SELPA regionalized services dollars and fee-for-service resources. Keeping the two functions completely separate is often difficult. Districts can easily become confused about when this individual is acting as the SELPA director and when the person is functioning as special education director.

Pros

- There would be greater consistency in program implementation, reducing the opportunity for the programs to become fragmented among several districts.
- Teachers can continue “job-alike” meetings.
- Because county office teachers have the first right of employment, many will continue their current assignments.
- Credentialed and classified staffs transferring to the district have experience working with their students.
- Class locations likely would not change.
- The large district providing the program support will have the infrastructure to absorb the additional staff and responsibilities assigned to the supporting the staff.
- Based on current regional program fees, the cost for students in SELPA-operated programs will be less than the amount charged by the county office, resulting in a cost savings for all SELPA districts.

Cons

- Before implementing this option, the SELPA superintendents’ council and county office would have to address the cash flow problem that would affect all SELPA districts as mentioned earlier in this report.
- Education Code Section 44903.7(b) prohibits certificated staff members that serve disabled students from being employees of a SELPA or the entity created by the SELPA. They are required to be employees of a school district or a county office.
- The SELPA’s role as an independent entity for all districts as equals could be in doubt when it is responsible for operating programs.
- The local plan will need to be revised to transfer the responsibility of operating programs to the SELPA.
- Teachers will not be more closely connected to the district where they are located than they are under the county office.
- Students would have no more access to district curriculum and integration than they have at present.
- Although county office teachers have rights of employment under program transfer, some teachers, administrators and other designated instruction providers may choose not to transfer, leaving openings that are difficult to fill.
- Rental agreements will need to be renegotiated with the district operating the programs under the SELPA.

- The cost for the new classes in the new county office building will need to be negotiated.
- The district operating the programs under the SELPA will have the increased responsibility of payroll, substitutes, safety programs, etc.

OPTION FIVE: The administration of county office classes is transferred to one of the two largest districts in the SELPA, which would be responsible for programs in the same manner as the county office.

The SELPA provided a comparison of the 2011-2012 cost if program were provided by the two largest districts, Ceres and Turlock, and the county office. Full compensation packages were compared, and staffing and student loading levels were maintained at county office levels. Although these numbers are estimates, they can be used to review this option. The data did not make adjustments for paying teachers to work during their preparation periods and used only one compensation package in calculating Turlock's rates.

The projected cost of running the programs currently operated by the county office is \$16,634,788 for the Ceres district, \$16,345,188 for the Turlock district, and \$20,007,036 if they remained with the county office. The data indicates that SELPA member districts would reduce their fee-for-service costs by \$3,372,248 if the programs were provided by the Ceres district and \$3,661,848 if the programs were provided by the Turlock district. The full program estimate provided by the SELPA to FCMAT is attached as Appendix B to this report.

Comparison of Program Operation by Provider

Program Provider	Cost of program	Difference between SCOE and District	Percentage Difference
Ceres	\$16,634,788	\$3,372,188	16.86%
Turlock	\$16,345,188	\$3,661,848	18.30%
SCOE	\$20,007,036		

Pros

- Consistency in program implementation would increase because one entity would operate the program.
- Because county office teachers have the first right of employment, many teachers will continue with their current assignments.
- Teachers will be able to continue "job-alike" meetings.
- Credentialed and classified staffs transferring to the district have experience working with their students.
- Large districts have the infrastructure to absorb the additional staff and responsibilities that go with supporting the staff.
- Class locations likely would not change.
- The SELPA member districts would significantly reduce their total fee-for-service costs.

Cons

- Before implementing this option, the SELPA superintendents' council and county office would have to address the cash flow problem that would affect all SELPA districts and is addressed above in this report.
- The district of residence is not the responsible party for program operation.

- Although county office teachers have rights of employment under program transfer, some teachers, administrators and other designated instruction providers may choose not to transfer, leaving openings that are often difficult to fill.
- Teachers would not be more closely connected to the district where they work than they are under the county office.
- Students would have no more access to district curriculum and integration.
- Rental agreements will need to be renegotiated with the district operating the programs under the SELPA.
- The cost for the new classes in the new county office building will need to be negotiated.

Recommendations

The SELPA should:

1. Establish a committee composed of district special education directors to develop a more comprehensive eligibility/referral process that includes the following:
 - A time line for referral that allows the receiving district adequate time to review all documents before an initial placement IEP.
 - Clear processes for interim placements and after placement.
 - The specific assessments and IEP information required in the referral packet.
 - The interventions the district of residence provided to the student in the least-restrictive environment before referral that were found to be inadequate to meet the student's needs.
 - A process for the referring and receiving district when the receiving district determines that the student is not appropriate or no longer appropriate for the program.
 - Alternative communication systems and processes to better coordinate IEP meetings such as telephone conferences, Internet video meetings, e-mail etc.
 - A process to respond to an emergency situation that requires immediate action by the district of service.
2. Continue operating regional classes whenever possible since they are effective in meeting students' needs without a more restrictive environment.

The county office should:

3. Consider lowering the indirect cost fee of 9.85% through the negotiation process.
4. Continue operating programs with a goal of reducing by 20% the total fee-for-service to districts for students that attend a county office special education program or receive services from a county office special education staff member such as a school psychologist. Districts have recently experienced a state funding reduction of 20 percent. This recommendation can be accomplished incrementally over the next few years.

If this is not possible, the SELPA should:

5. Implement Option Four to provide the most cohesive and cost-effective programs for the SELPA member districts. Using this option, the following would occur:
 - The county office would continue operating programs for infants, alternative education, court and community schools.
 - The council of superintendents would first ensure cash flow concerns are clearly addressed so that all districts remain solvent.
 - A committee of SELPA member district superintendents, business officials and special education directors would be formed to determine which of the two largest districts would operate the program.
 - Following this decision, a number of steps will be required to ensure a successful transition. These include the following:
 - Assigning designated staff whose primary responsibility will be to ensure that the transfer process is completed as outlined and to provide the necessary support to the transferred classes and site staff after completion.
 - Begin discussions with parents and the staff regarding the possible transfer of programs through regularly scheduled meetings, e-mail updates, telephone conversations, etc.
 - Establish ongoing meetings at the receiving district to ensure it has the infrastructure to support program transfer. This would include facilities, transportation, business, program, and human resources.
 - Provide ongoing updates for the school board(s) in receiving district(s).
 - Identify all students for transfer.
 - Develop a matrix that includes the student's IEP goals, the amount of time for each student's related services, the setting for each service, any additional paraprofessional necessary and whether transportation is required.
 - Establish the facilities to be included in the transfer and negotiate for district purchase or lease for others.
 - Ensure that transportation is transitioned and available for each student when the programs begin.
 - Complete an audit of all materials and equipment. The SELPA should determine whether materials and equipment should remain in the class for the use of the receiving district and develop appropriate agreements on the transfer of all low-incidence equipment.
 - Complete a human resources review on the transfer of certificated and classified staff members.
 - Determine the actual costs of each program based on staffing information including the psychologist and nurses, facilities, materials, equipment, maintenance, etc.
 - Determine the indirect costs to be included in fee-for-service model.
 - Convene IEP meetings 30-45 days before the transfer for each student to prevent any misunderstandings and maintain program/service continuity.

- Begin training district personnel at receiving sites six months before the transfer. Training should include disability awareness for the administrators and staff at sites that are unfamiliar with the moderate to severe population. Administrators should also be trained in fulfilling additional responsibilities and using the available support structures.

Facilities

Moderate to severe regional programs are housed in facilities that are owned by the SELPA, county office and member districts. Some facilities are owned by county office and were purchased by the SELPA years ago. The newer county-office-owned facilities were purchased with hardship funds.

The following table indicates the number of facilities and which entity owns each building.

Classes Operated by the Stanislaus County Office of Education

District Location of Classroom(s)	Ceres	Empire	Hart Ransom	Oakdale	Patterson	Riverbank	Salida	Stanislaus	Sylvan	Turlock	Waterford	SCOE	Total
Facility Owner	Number of Classrooms												
District	0	4	0	0	0	3	5	4	4	3	1	0	24
SELPA	1	0	2	0	0	0	0	0	2	0	0	3	8
SCOE	0	2	0	0	0	1	1	0	1	0	0	22	27
Total SCOE Operated	1	6	2	0	0	4	6	4	7	3	1	25	59

Districts that operate regionalized severe special education programs have demonstrated that they have the capacity to operate programs in their district facilities. Some member districts would have sufficient facilities to operate additional programs if they could purchase these facilities from the county office for \$1 since the buildings were constructed with public funds for special education purposes. Another option is to use the SELPA facility lease policy, which is outlined in the next paragraph.

SELPA facility policy guidelines state that facility payments of \$2,500 or \$5,000 will be applied to all regional classrooms. The lessee or owner will pay \$2,500 annually for rental and custodial fees. According to the policy, maintenance of more than \$500 per incident and property insurance is the responsibility of the facility owner, who also is required to approve any improvements. Facility payments collected by the SELPA will be maintained in an account designated to cover facility maintenance costs of more than \$500 per incident. The SELPA annually develops master lease and custodial agreements, maintains records of classroom use, and coordinates the billing process with each district.

Recommendations

The county office and districts should:

1. Discuss the acquisition of facilities that are not district-owned. During these discussions, the county office and districts should ensure that the cost of facilities is not a barrier to operating programs and serving students' needs.
2. Make available the facilities they own for purchase by the district for \$1, or lease these facilities to districts at the rate as included in the SELPA facility policy.

AB 602 Funding Model

Eighty-five of the 124 SELPAs in California are composed of two or more local education agencies. Each SELPA is responsible for defining and implementing an allocation plan for distributing to its member agencies AB 602 state aid funding, IDEA Part B local assistance funding, and local property taxes for special education. This funding is to help local education agencies pay the excess costs of providing special education services to disabled students.

In January 1974, the California State Board of Education adopted the California Master Plan for Special Education. While much has changed over the last 37 years, the underlying purpose of the fiscal model remains essentially intact and provides the following guidance.

The objectives essential to the construction of an equitable finance plan for special education are as follows:

1. Provide adequate resources to assure equality of educational opportunity for all individuals with exceptional needs.
 2. Provide levels of support for special education programs which will promote programs and services of equal quality.
 3. Provide encouragement for the development of comprehensive programs.
 4. Promote both program and fiscal accountability.
 5. Clarify fiscal relationships between state, county, and district.
 6. Ensure equity in support levels among various program components.
 7. Provide adjustments in support levels to reflect changing costs.
 8. Provide support based on needs of pupils enrolled in special education-funding based on specified programs and services rather than on categorical disability groupings.
 9. Ensure that reporting and auditing policies and procedures are meaningful for evaluation and program development.
 10. Provide methods for monitoring and evaluating quality control in special education
- (California Master Plan for Special Education, California State Board of Education, Jan. 10, 1974, Pages 36-37) emphasis added

None of the state's 85 multiagency SELPAs is exactly like another. Each SELPA addresses concerns of "equality of educational opportunity," "programs and services of equal quality," and "equity in support levels" using its own demographic, socioeconomic, and political considerations. Therefore, there is no single correct way to construct a SELPA funding model.

Of equal importance is the SELPA's responsibility to continuously review and analyze its funding model to ensure funds are used effectively and optimize equal opportunity and quality as well as equity of support. AB 602 was developed to give SELPAs a state funding model that could be changed according to the circumstances.

SELPA fiscal policies frequently include wording such as the following sample:

"It is the responsibility of each member LEA and the SELPA to assure a free and appropriate education for each special education pupil residing within its geographical boundaries. This responsibility shall be met by direct provision of services, establishing

an agreement with another public education agency, or contracting with non-public school and agencies. The allocation plan for distribution of resources must recognize the responsibility for all children in the SELPA while addressing the need to equitably share resources among the districts and county office of education. The allocation process and procedures are for the distribution of available resources and are not a restriction of services to be provided for eligible pupils.”

This paragraph is often followed by guiding principles such as the following:

“The allocation plan is the means by which the SELPA distributes funds it receives from county property taxes, state, and federal sources to the local educational agencies for the purpose of assistance in paying the excess costs of providing special education services.

It should be kept in mind that these are “communal monies” and are not the “private property” of the recipient. Each member has a legitimate stake in the equitability of the allocations and in how other members use the resources.

The guiding principle should be that no member accrues undue benefit at the expense of other members. Thus, the allocation model must be fair, equitable, and transparent to all members.”

These statements clearly articulate the SELPA allocation plan’s purpose. The key to successful collaboration is trust, which is fostered through openness and communication. This is especially important when it comes to allocation of resources.

SELPA receives funding from three sources to help districts pay the excess costs of providing special education programs and services to children with physical, emotional, or developmental disabilities. These sources are federal funds provided by the Individuals with Disabilities Education Act (IDEA), state funds provided according to Part 30 of the Education Code (commonly referred to as AB 602 funding), and local funds raised through local property taxes to fund special education programs and services.

The Stanislaus County SELPA operates on a fee-for-service basis. With few exceptions, this operational model allocates all revenue to the school districts to help pay the excess costs of special education programs and services. State and local property tax funding is allocated based on each district’s reported average daily attendance, and federal funds are distributed based on the numbers of disabled children served by the district in the prior year.

The districts may choose to use these funds to provide services to all disabled children living in the district, or to provide them for some disabled children and arrange for another agency to provide them to those that remain.

Four agencies provide regional services. Traditionally, the county office was the sole regional provider; however, it was joined by the Ceres, Sylvan, and Turlock districts in the last decade. Each year, these agencies establish service fees based on the cost of providing the special education services needed by children with varying disabling conditions. The districts then pay these regional providers a fee for service for children served

While allocating equal amounts of resources based on reported average daily attendance or numbers of pupils served in the prior year may be equal, it may not necessarily be equitable. Demographic, geographic, and socioeconomic factors may warrant an increase to ensure fairness and equitability. One option is to set aside a pool of funds to help any district, small or large, with extraordinary costs. However, extraordinary costs should be carefully defined and criteria developed to prevent abuse of the funding pool.

The current funding model creates an incentive for excessive placements in certified nonsectarian nonpublic schools (NPSs). The funds provided by the AB602 funding model for students placed out-of-home in group homes, foster homes, and other similar facilities is used to pay for NPS placements. In 2010-11, almost 300 students were placed in NPS programs and/or received services from certified nonsectarian nonpublic agencies (NPAs) at a cost of \$5.7 million. Almost all of these students have been identified as autistic or emotionally disturbed. Ceres and Turlock, the two largest districts that are also being considered to operate regional programs, have somewhat higher numbers of these placements with 53 and 72 respectively.

A review of the fiscal reports to the superintendent's council found that they are thorough and detailed. These reports may be invaluable for the fiscal staff, but the amount of information included could be excessive for the program staff. Although all reports should be available to both fiscal and program decision makers, they should be modified according to the reader.

Recommendations

The SELPA should:

1. Consider reviewing its allocation model to determine whether greater equitability can be incorporated. For example, the SELPA could utilize some resources before funding is disbursed to the members. These resources could be used to fund a per-ADA "add-on" for districts affected by factors such as demography, geography, and socioeconomic attributes. These funds could also be used as to help any district, regardless of size, confronted with an extraordinary cost.
2. Consider developing summaries of fiscal information appropriate for readers that are less fiscally oriented. All information should still be available to all SELPA decision makers.
3. Reconsider the use of out-of-home funds to eliminate an incentive for NPS placements. The SELPA should also develop plans to provide educational programs for these students on regular school sites to the greatest practicable extent.

Staffing and Caseloads

The Stanislaus SELPA has developed program standards to determine class loading for county moderate to severe special day classes (Local Plan: Section 2) These standards are reviewed annually and updated with the approval of the superintendent's council according to SELPA Local Plan Policy # 2020. Class loading standards are based on best practice not class maximums and address students per class by grade level. They do not address staff ratios for paraprofessionals/aides.

The Stanislaus Association of Certificated Personnel contract (2008-10) states that the employer is required to “maintain the class size and caseload in compliance with the rules and regulations of the Stanislaus Special Education Local Plan Area and the State Education Code. These may be less than, but in no case more than stipulated.” (Article 23 23.1 Class Size). This has resulted in the county office operating several classes below the program standard. This can result in excess costs for programs and services, which is passed on to local districts. Article 23 1.4 allows for flexibility in the standard by stating “in the event of a reduction in state funding, the parties agree to reopen this article for the purpose of renegotiating these provisions.” The county office should consider reopening contract negotiations regarding the SELPA program standards because of shortfalls in state funding and the excess costs associated with the fee-for-service model for local districts.

Moderate to Severe Class Caseloads

The Education Code does not indicate maximum caseloads for special day classes; however, School Services of California, Inc. (SSC) has developed recommended caseload guidelines using data collected throughout the state. These guidelines are used across the state as the standard of practice for efficient special education staffing.

The county office's staffing data was collected, compared with that of SSC, and summarized in the following table. County office programs were clustered by type of program and reviewed in both county office, SELPA and SSC moderate to severe disability categories.

Classified and Certificated Staffing Caseloads

PROGRAM	GRADE LEVEL	TEACHER FTEs	AVERAGE PARAS PER CLASS	CLASS LOADING AVERAGES	COE SELPA LOADING STANDARDS	SSC RECOMMENDED CASELOADS
Developmentally Delayed (Severely Disabled & Behavior)	Preformal	4	1.1	12	10-12	10-12 Students 2 Aides
	Primary	2	.6875	6	11	10-12 Students 2 Aides
	Intermediate (Behavior)	2	.9	6	10	10-12 Students 2 Aides
	High (Behavior)	3	.9	9	10	10-12 Students 2 Aides
Autism	Preformal	5	4.68	8	12	8 Students 2 Aides
	Primary	5	4.68	7	8	8 Students 2 Aides
	Intermediate	1	2.5	10	9	8 Students 2 Aides
	Junior High	2	2.5	6.5	10	8 Students 2 Aides
Multihandicapped	Preformal	2	.5625	9	8	8-10 Students 2 Aides
	Primary	1	.96	8	8	8-10 Students 2 Aides
	Intermediate	1	.96	7	10	8-10 Students 2 Aides
	High	1	.96	6	12	8-10 Students 2 Aides
Hearing Impaired	Preformal	2	.75	6	8	8-10 Students 2 Aides
	Primary	2	.75	5	8	8-10 Students 2 Aides
	Intermediate	1	.75	6	10	8-10 Students 2 Aides
Emotionally Disturbed	Primary Level 3	1	1.25	6	10	8-10 Students 2 Aides
	Intermediate Level 2	2	1.25	7	12	8-10 Students 2 Aides
	Intermediate Level 3	1	1.25	8	10	8-10 Students 2 Aides
	Junior High Level 3	1	1.25	12	12	8-10 Students 2 Aides
	High Level 3	1	1.25	11	15	8-10 Students 2 Aides
Orthopedically Impaired (Medically Fragile)	Intermediate	1	2.31	12	12	8 Students 2-3 Aides
Developmentally Delayed (Life Skills)	Transition	2	.75	7	10	10-12 Students 2 Aides

FCMAT found several instances in which county office programs were loaded at a level that is lower than the standard recommended for program efficiency; however, classroom support is balanced with a high ratio of 1-to-1 instructional aides. Certificated and classified ratios are addressed in each SSC category of program is as follows:

1. Developmental Delay

Average class loadings were lower than recommended enrollment for all grade levels except the preformal level, which was at the SSC-recommended level. The ratio of paraprofessionals assigned to classes was lower than recommended at all grade levels.

2. Autism

Average class loadings for autism classes were lower than recommended for preformal, primary, and junior high, and higher than recommended for intermediate. The ratio of paraprofessionals assigned to classes was higher than recommended.

3. Multihandicap

Average class loadings were at recommended levels for preformal and primary grades, and lower than recommended at the Intermediate and high school levels. The ratio of paraprofessionals assigned to classes was lower than recommended.

1. Hearing Impairment

Average class loadings were lower than recommended levels at all grade levels. The ratio of paraprofessionals assigned to classes was lower than recommended.

2. Emotional Disturbance

Average class loadings were lower than recommended at the primary and intermediate levels and higher than recommended at the junior high and high school levels. The ratio of paraprofessionals assigned to classes was lower than recommended.

3. Orthopedic Impairment

Average class loadings were higher than recommended. The ratio of paraprofessionals was at the recommended level with the caveat that the class loading was higher than recommended, concluding that the number of paraprofessionals was lower than needed for a class of this size.

4. Developmental Delay-Transition

Average class loadings were lower than recommended. The ratio of paraprofessionals was lower than recommended.

The county office has a general trend of programs with lower-than-recommended class loadings. Programs for the developmentally delayed (not including transition) and autistic have a higher ratio of paraprofessionals than recommended, and all other programs have a lower ratio of paraprofessionals than recommended.

1-to-1 Paraprofessionals

The assignments of 1-to-1 paraprofessionals were evaluated as part of the review of current classified staffing levels to determine efficiency in the county office moderate to severe programs. Fifty-seven 1-to-1 paraprofessionals were assigned to students. Paraprofessional assignments ranged from three hours per day to six hours per day, with most paraprofessionals having a six-hour day assignment. The total cost of \$1,567,577 for county office 1-to-1 paraprofessionals results in an increase of excess costs that is passed on the local districts.

1-to-1 Paraprofessional Ratios by Program

Program	Stanislaus COE Average Staffing Ratio	Number of 1-to-1 aides	SSC Recommended Caseloads
Developmentally Delayed 4 Preformal 2 Primary 2 Intermediate 3 High	9.8 Students 1 Teacher 1 Aide	1 – 3.5 Hours 6 – 3 Hours 35 - 6 Hours	10-12 Students 2 Aides
Autism 5 Preformal 9 Primary 1 Intermediate 2 Junior High	7 Students 1 Teacher 4 Aides	1 – 3 hours 9 – 6 hours	8 Students 2 Aides
Multiple Handicap 2 Preformal 1 Primary 1 Intermediate 1 Junior High 1 High	7 Students 1 Teacher 1 Aide	2 – 6 hours	8-10 Students 1 Aide
Hearing Impaired 2 Preformal 2 Primary 1 Intermediate	6 Students 1 Teacher 1 Aide (not FT)	1 – 5.5 hours	8-10 Students 2 Aides
Emotional Disturbed 1 Primary Level 3 2 Intermediate Level 2 1 Intermediate Level 3 1 Junior High Level 3 1 High Level 3	10 Students 1 Teacher 1 Aide	Zero	8-10 Students 2 Aides
Orthopedically Impaired 1 Intermediate	12 Students 1 Teacher 2 aides	2 – 6 hours	8 Students 2-3 Aides
Developmentally Delayed-Life Skills 2 Transition	7 Students 1 Teacher .75 Aides	Zero	10-12 Students 2 Aides

Caseloads/ Designated Instruction Services

The county office has 5.75 psychologists. They serve a combined role with the moderate to severe classes at the county level, SELPA regional classes, and in some instances direct psychological school services to individual districts. Based on this unique configuration of service delivery, this staffing level is appropriate.

Caseloads for adapted physical education (APE) teachers in moderate to severe classes average 42 students, which is within the standard caseloads for APE teachers outlined in the SSC guidelines.

The Stanislaus SELPA program standards for preschool speech and language specialist caseloads are within those required in Education Code; however, these standards limit the caseload for speech and language specialists (ages five to 22) to 50 students. Education Code Section 3051.1(4) (b) stipulates that “a full time equivalent language and speech specialist caseload shall not exceed a district wide, special education local plan area wide, or county wide average of 55 students unless prior written approval has been granted by the State Superintendent of Public Instruction.” Revising the SELPA program standard on caseloads for speech and language specialists to align with Education Code could result in a staffing reduction of at least one position at an annual savings of \$85,649. In addition, Stanislaus County districts could benefit from calculating the countywide average caseload and making appropriate adjustments in county office programs.

Recommendations

The districts and SELPA should

1. Revise the SELPA class loading guidelines to incorporate SSC's recommended guidelines and include certificated and classified staffing formulas.
2. Align loadings in all classes with the SSC recommended guidelines.
3. Ensure that programs with class loadings that are lower than SSC recommended guidelines are closely monitored.
4. Decrease the ratio of paraprofessionals in autism classes to reflect the SSC recommended guidelines.
5. Reevaluate the program standards used for class loading in the Stanislaus County SELPA.
6. Consider holding discussions with the Stanislaus Association of Certificated Personnel regarding the need for alignment with the standard of practice in class loading.
7. Increase paraprofessional assignments in all other programs consistent with the SSC recommended guidelines.
8. Decrease the number of 1-to-1 aides' assignments through balancing classroom support levels with instructional aides rather than using 1-to-1 levels
9. Revise the SELPA program standard for speech and language specialist caseloads (ages five to 22) to align with the Education Code.
10. Work with all districts in Stanislaus County to determine the average speech and language caseload and align county office caseloads accordingly.

Management Staffing Formulas

Staffing formulas for special education management and program support were analyzed using data from two of the largest school districts in Stanislaus County SELPA, the Stanislaus County of Education and three comparable county offices (Level 3). For comparative purposes, the administrative review for the districts and county office in Stanislaus County include administrators at various levels, program specialists and psychologists. The administrative review for comparable county offices of education includes administrators and program managers but not program specialists and psychologists.

In the following table, the number of psychologists and program specialists are consistent between districts and the county. Discussions should take place regarding the role of the psychologist in moderate to severe programs and also to develop an understanding of their role as a direct service provider to smaller school districts.

Administrative Staffing Comparison

Stanislaus County Office/Ceres Unified/Turlock Unified

District/County	Special Education Students	Administrators	Program Specialists	Psychologists
Ceres Unified	1,398	1.25 FTE	3.0 FTE	7.0 FTE
Turlock Unified	1,404	1 FTE	3.5 FTE	6.55 FTE
SCOE	555	6 FTE	3 FTE	5.4 FTE

Source: California Department of Education, Dataquest 2010

Document from the Business Offices (Ceres and Turlock)

SCOE Special Education Organizational Chart 2011 – 12

The county office maintains a high administrative level of support compared to the two largest districts in the SELPA. Before a transfer, the receiving district(s) should discuss the role of administration in program operation and make appropriate adjustments when possible. For example, more program specialists could be needed instead of six full-time administrators. This would result in a savings of \$23,020 for each position or \$138,120 for all six positions and still provide appropriate levels of support.

Using data from the Fresno, Solano, Sonoma and Stanislaus county offices, FCMAT found that the average number of special education management positions is 9 FTE. Special education management for the Stanislaus county office exceeds the average in other Level 3 counties by 1 FTE. In addition, the average level of clerical support in the same counties is 9.3 FTE, while the Stanislaus County Office clerical support level is 10 FTE. The Stanislaus County Office of Education should align the management structure in the special education department with that of comparable county offices. This alignment would result in a reduction in a one director II position at an average annual savings of \$131,521 and a clerical support reduction of 1.7 FTE for an average annual savings of \$150,033. Since the county office has an open director II position, it could implement the management reduction during the 2011-12 school year.

Administrative Comparison

Comparable Counties Level 3

County	Special Education Students	Administrators	Clerical
Fresno		0.5 Administrator	2 FTE
		1.0 Director	---
		8.0 Program Managers	8 FTE
		TOTAL 9.5 FTE	10 FTE
Solano		1.0 Senior Director	1 FTE
		4.0 Principals	5 FTE
		2.0 Program Managers	2 FTE
		TOTAL 7.0 FTE	8 FTE
Sonoma		1.0 Asst Supt.	1 FTE
		2.0 Director	2 FTE
		1.0 Adm / Nonpublic Schools	1 FTE
		5.0 Principals	5 FTE
TOTAL 9.0 FTE	9 FTE		
Stanislaus		1.0 Divisional Director	2 FTE
		4.0 Director II	5 FTE
		4.0 Program Specialists	2 FTE
		1.0 Principal	1 FTE
Total 10 FTE	10 FTE		
Level 3 County Avg = 9.0			Avg = 9.3

Total Compensation

FCMAT performed total compensation comparisons for special education management positions at two of the largest districts in the Stanislaus County SELPA (Ceres and Turlock) and the county office. The administrative positions reviewed were the division director, director I, director II and principal. The director II position is aligned to the director position in both districts; however, neither district has a position at the level of division director. If districts proceed with the program transfer, this position should be reevaluated. Elimination could lead to a potential annual savings of \$157,082.

2011-12 Total Average Compensation Expenditures within Current Staffing Stanislaus County / Ceres Unified / Turlock Unified

District/County	Adm 1	Adm 2	Adm 3	Total
Ceres Unified	Director \$136,484	Asst Supt (25%) \$42,076	None	\$178,560
Turlock Unified	Director \$133,210	None	None	\$133,210
SCOE	Division Director \$157,082	Director II (4) \$526,084	Principal \$121,717	\$804,883

Note: Psychologists in some districts are split funded between special education and general education

Source: California Department of Education, Dataquest 2010

Document from the Business Offices (Ceres and Turlock)

SCOE Special Education Organizational Chart 2011 - 12

The most notable difference in the total compensation of certificated staff members is for district and county teachers, speech pathologists and other DIS providers. The difference in total average compensation between teachers/specialists in the two largest districts (Ceres and Turlock) and the county office is \$12,851. The potential program transfer includes 51 classes. The infant, alternative, juvenile court and community schools programs are not included in the potential program transfer. The following table outlines the specific savings of group of certificated positions by area of total compensation. This could result in a total compensation savings of \$947,884.

Total Average Compensation Comparison by District/County Office/Position

Position	Ceres Unified	Turlock Unified	SCOE
Assistant Supt.	(25%) \$42,076	---	---
Division Director	---	---	\$157,082
Director	\$136,484	\$133,210	\$131,521
Principal	---	---	\$121,717
Program Specialist	\$115,115	\$110,968	\$106,035
Psychologist	\$100,824	\$105,162	\$105,071
Speech Therapist	\$77,086*	\$69,431	\$85,649
Teachers	\$72,802	\$72,794	\$85,649

**Includes annual stipend of \$4284*

Potential Savings in Certificated Teacher/Specialist Salaries if County Office Aligned to Districts

Position	#	Avg Total Comp (Ceres/Turlock)	SCOE	Difference
Teacher	51 classes	\$3,712,698	\$4,368,099	\$655,401
Speech Pathologists	9.4 FTE	\$695,956.	\$813,665.	\$117,709.
DHH	9.0	\$655,182.	\$770,841	\$115,659
APE	4.6	\$334,870.	\$393,985	\$59,115
Total		\$5,398,706.	\$6,346,590	\$947,884

Recommendations

If a program transfer occurs, the districts should:

1. Maintain program specialist/psychologist staffing at the current level.
2. Review the county office administrative structure for special education. If programs are transferred to a district for operation, the district should consider adjusting the current administrative positions from directors to program specialists for a savings of \$138,120.
3. Reevaluate the need for a division director position. Elimination could result in an additional savings of \$157,082.

If a program transfer does not occur, the county office should:

4. Align the administrative structure with comparable counties (Level 3) by eliminating one director II position for an additional annual savings of \$131,521 and \$150,082 in clerical support.

Paraprofessional Staffing

Throughout California, the number of districts utilizing paraprofessionals, 1-to-1 aides, and special circumstance instructional aides has significantly increased over the past few years. This has affected special education budgets and contributions from the unrestricted general fund, especially when students receive services that are not warranted or monitored, creating a sense of dependence. Districts can ensure students receive only appropriate services by implementing guidelines, policy, and procedures and closely monitoring these services.

The county office employs 187 paraprofessionals for moderate to severe programs, and 57 are assigned to individual students as one-on-one paraprofessionals. One-on-one paraprofessionals represent 30% of the paraprofessional assignments in county office programs. All county office classes except those for the autistic have a lower than recommended ratio of paraprofessionals assigned to classes. As the following table shows, one-on-one paraprofessionals are assigned in high numbers to classes for the developmentally delayed, autistic, multihandicapped, and orthopedically impaired. This is an inefficient means of staffing classrooms and providing support to students.

Paraprofessional and 1-to-1 Paraprofessional Assignments

Program	Stanislaus COE Average Paraprofessional Staffing Ratio	SSC Recommended Caseloads	Number of 1-to-1 Paraprofessionals
Developmentally Delayed 4 Preformal 2 Primary 2 Intermediate 3 High	9.8 Students 1 Aide	10-12 Students 2 Aides	1 – 3.5 Hours 6 – 3 Hours 35 - 6 Hours
Autism 5 Preformal 9 Primary 1 Intermediate 2 Junior High	7 Students 4 Aides	8 Students 2 Aides	1 – 3 hours 9 – 6 hours
Multiple Handicap 2 Preformal 1 Primary 1 Intermediate 1 Junior High 1 High	7 Students 1 Aide	8-10 Students 1 Aide	2 – 6 hours
Hearing Impaired 2 Preformal 2 Primary 1 Intermediate	6 Students 1 Aide (not FT)	8-10 Students 2 Aides	1 – 5.5 hours
Emotional Disturbed 1 Primary Level 3 2 Intermediate Level 2 1 Intermediate Level 3 1 Junior High Level 3 1 High Level 3	10 Students 1 Aide	8-10 Students 2 Aides	Zero
Orthopedically Impaired 1 Intermediate	12 Students 2 aides	8 Students 2-3 Aides	2 – 6 hours

The SELPA has no policy or procedures for assigning, supporting, reducing or dismissing paraprofessionals, including one-on-one paraprofessional services. As a result, there is no structure to help make decisions on the appropriateness of one-on-one paraprofessional when this type of support is requested. This increases the potential for adversarial IEPs. When the use of a one-on-one paraprofessional is determined to be appropriate, the IEP team does not include a “fading” or exit plan for these services.

Establishing guidelines can help the county office staff and districts when parents and advocates challenge decisions on these services. Implementation of these guidelines should be followed by extensive and mandatory training for administrators, general and special education staff members. Policy and procedure should include the following components:

1. Determination of the assignment of paraprofessionals to classrooms.
2. Determination of the need for one-on-one paraprofessional assignments within a step-by-step structured process.
3. Alternatives to one-on-one paraprofessionals.
4. Determination of whether existing resources are being utilized.
5. Evaluation of the continuing need for one-on-one paraprofessionals.
6. Determination of when it is appropriate to add hours to an existing paraprofessional’s schedule.

Many districts use the term “special circumstance instructional aides” instead of one-on-one paraprofessional to indicate that an assignment is temporary. Transitioning or “fading” a student away from this service is important in fostering independence.

Policies and procedures should clearly define the role of the special education director, special education staff, and school site administrators. Once policies and procedures are implemented, a review of all paraprofessional placements should be conducted with the goal of utilizing these resources more effectively.

Recommendations

The SELPA should:

1. Develop policy and procedure for determining paraprofessional assignments to reflect the recommended guidelines of SSC.
2. Develop policy and procedure for the use of special circumstance instructional aides instead of one-on-one paraprofessionals and guidelines for general instructional aides. (A sample of these guidelines is attached as Appendix C to this report).
3. Develop policies and procedures to help, support, reduce, and discontinue paraprofessional services.
4. Develop policies and procedures including some that establish monitoring and “fading” plans at IEP meetings.
5. Evaluate the continuing need for instructional one-on-one paraprofessionals. Whenever possible, the SELPA should consider the use of 3.5-hour paraprofessionals to reduce costs. Specific staff members should be responsible for analyzing paraprofessional usage and student needs. The SELPA should also clearly define the roles of the special education directors, special education staff, and school site staff in this regard.
6. Ensure that the placement of paraprofessionals matches the strengths and needs of the student and staff.

Legal Costs

The SELPA and its member districts have incurred legal costs in representing districts, the county office, and the SELPA in due process filings and reimbursements for parent's representation. Legal costs for district and parent representation over the past three year are shown in the following table:

Legal Costs Incurred in the SELPA

	District representation	Parent representation
2008-09	\$292,044	\$30,000
2009-10	\$382,748	\$73,468
2010-11	\$175,145	\$30,843

FCMAT reviewed complaints filed in the last three years with the State Department of Education, including the type and result of the complaint. One complaint was filed in 2008-09, with the district found to be in compliance. In 2009-10, complaints were filed against two different districts concerning four different issues, and one district was found out of compliance on one of the four issues. In 2010-11, five complaints were filed against five different school districts. Two of the issues were found to be out of compliance, and one issue was split. The other issues were found in the district's favor. The compliance issues were not systemic, and the districts were generally in compliance.

FCMAT reviewed due process filings during these same three years. In 2008-09 six were cases filed against five different school districts. Two of the cases were resolved through a settlement agreement, one through mediation, one through a resolution meeting, and two by a due process decision. These two included a total of 18 issues, with the districts found to be in compliance in 15. There were no due process filings in 2009-10, and two filings have occurred in 2010-11. One was decided in favor of the district, and the other is still in process.

The issues were not systemic and were generally resolved in favor of the district.

The SELPA director helps districts resolve complaints and due process filings whenever requested by a district. The director and the SELPA staff are also available to assist a district in resolving concerns before a complaint or due process filing.

Recommendations

The SELPA should:

1. Continue mitigating the number of complaints and due process filings by utilizing the SELPA director and other SELPA staff members to resolve issues before filings and while resolving the issues regarding the complaint or due process.
2. Continue to monitor all complaints and due process filings to ensure that issues are not systemic.
3. Inform the special education directors at their monthly meetings of all complaints and due process filings issues to ensure that issues do not become systemic.

Appendices

- A. Notification Letter for Program Transfer**
- B. Full Program Estimates for Program Transfer**
- C. Policy and Procedures for 1-to-1 Aides**
- D. Study Agreement**

Appendix A

Stanislaus SELPA

Stanislaus Special Education Local Plan Area

Regina A. Hedin,

SELPA Director

(209) 541-2944

FAX (209) 541-2947

Mailing Address:
1100 H Street
Modesto, CA 95354

Location:
Hatch & Stonum
(Behind JFK Complex)

June 27, 2011

Mr. Tom Changnon, Superintendent
Stanislaus County Office of Education
1100 H Street
Modesto, CA 95354

RE: Possible Transfer of Stanislaus SELPA Administrative Unit

Dear Tom,

On June 17, 2011, the Stanislaus SELPA Superintendent's Council voted to proceed with the possible transfer of the Administrative Unit and Special Education programs, currently operated by the Stanislaus County Office of Education (SCOE) to a SELPA member district commencing July 1, 2012.

This letter will serve as notice, pursuant to provisions in the Local Plan and the California Education Code 56140, 56207(b), 56195(c)(1), 56195.7 and 56205.

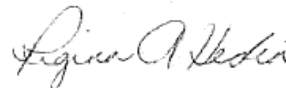
In addition to the above proposal, the Supt's Council agreed to your suggestion of FCMAT conducting a SELPA review of Regionalized Programs. This review will take place on July 25-29, 2011 with a full report of their assessment given at the September 23, 2011 Supt's Council meeting. The Supt's Council will make a final determination if the SELPA will proceed with moving the AU and/or the transfer of Special Education programs operated by SCOE sometime in October 2011.

We look forward to working collaboratively with SCOE as we proceed with the possible transfer process. Please feel free to contact me with any questions regarding this letter.

Sincerely,



Brian Beck,
SELPA Superintendent's Council, Chair



Regina A. Hedin
SELPA Director

Cc: Supt's Council Members
C. Quaide, Legal Counsel for SELPA

Appendix B

FEE FOR SERVICE	2011-2012	2011-2012	2011-2012	SCOE/CERES		SCOE/TURLOCK	
PROGRAMS	CERES	SCOE	TURLOCK	COST SAVING	%	COST SAVING	%
SDC Emotionally Disturbed	1,094,310	1,379,317	1,073,303	(285,007)	-20.66%	(306,014)	-22.19%
DIS Emotionally Disturbed Inclusion	332,195	389,694	312,540	(57,499)	-14.75%	(77,154)	-19.80%
RSP Resource Specialist Program Preformal	62,695	82,119	57,733	(19,424)	-23.65%	(24,386)	-29.70%
SDC SH Multiple Handicap Preformal (MLA)	456,865	541,452	443,765	(84,587)	-15.62%	(97,687)	-18.04%
SDC SH Preformal Integrated Site	642,647	745,620	626,708	(102,973)	-13.81%	(118,912)	-15.95%
DIS Speech and Language Therapy	1,364,295	1,732,648	1,337,713	(368,353)	-21.26%	(394,935)	-22.79%
DIS E.I. One Assessment	28,346	30,969	27,204	(2,623)	-8.47%	(3,765)	-12.16%
DIS E.I. Two Assessments	56,688	61,938	54,406	(5,250)	-8.48%	(7,532)	-12.16%
DIS E.I. Three Assessments	85,035	92,908	81,610	(7,873)	-8.47%	(11,298)	-12.16%
DIS E.I. Assessment Full Team	396,816	433,563	380,835	(36,747)	-8.48%	(52,728)	-12.16%
SDC SH Medically Fragile	390,309	457,102	383,435	(66,793)	-14.61%	(73,668)	-16.12%
SDC SH Behavior Impulsive	1,126,363	1,298,864	1,112,580	(172,501)	-13.28%	(186,285)	-14.34%
SDC SH Life skills JFK	359,858	427,452	356,671	(67,594)	-15.81%	(70,780)	-16.56%
DIS Autism Inclusion	499,015	595,342	502,922	(96,328)	-16.18%	(92,420)	-15.52%
SDC Autism Preformal	1,510,404	1,811,348	1,484,174	(300,944)	-16.61%	(327,174)	-18.06%
SDC Autism Primary	2,749,594	3,285,637	2,708,506	(536,043)	-16.31%	(577,131)	-17.57%
SDC Severe Disorder of Language School Age	184,695	236,306	185,261	(51,611)	-21.84%	(51,045)	-21.60%
SDC Severe Disorder of Language Preformal	183,668	218,492	181,525	(34,824)	-15.94%	(36,967)	-16.92%
SDC Autism Interm/ JH	1,129,424	1,271,823	1,116,767	(142,399)	-11.20%	(155,056)	-12.19%
DIS Assistive Technology Assessment	7,558	9,236	7,426	(1,678)	-18.17%	(1,810)	-19.60%
DIS Assistive Technology Inclusion	21,161	25,866	20,792	(4,705)	-18.19%	(5,074)	-19.62%
DIS Assistive Technology Support	269,054	328,868	264,359	(59,814)	-18.19%	(64,509)	-19.62%
DIS Assistive Technology Consult	4,535	5,543	4,456	(1,008)	-18.19%	(1,087)	-19.62%
SDC SH Multiple Handicapped	916,724	1,082,539	903,678	(165,816)	-15.32%	(178,862)	-16.52%
DIS Physically Handicapped Assessment	371	423	372	(52)	-12.30%	(51)	-11.94%

DIS Physically Handicapped Inclusion	13,371	15,256	13,402	(1,885)	-12.36%	(1,854)	-12.15%
DIS Physically Handicapped Support	126,283	144,077	126,573	(17,794)	-12.35%	(17,504)	-12.15%
DIS Physically Handicapped Consultation	8,542	9,746	8,562	(1,204)	-12.35%	(1,184)	-12.14%
DIS Severe Inclusion	284,274	337,469	281,279	(53,195)	-15.76%	(56,190)	-16.65%
DIS Visually Handicapped Inclusion	140,356	169,789	137,133	(29,433)	-17.33%	(32,656)	-19.23%
DIS Visually Handicapped Support	201,763	244,703	197,129	(42,940)	-17.55%	(47,574)	-19.44%
DIS Visually Handicapped Consultation	28,823	34,867	28,161	(6,044)	-17.33%	(6,706)	-19.23%
DIS Visually Handicapped Assessment	2,005	2,425	1,959	(420)	-17.32%	(466)	-19.23%
DIS Visually Handicapped O&M Inclusion	38,598	46,692	37,712	(8,094)	-17.34%	(8,980)	-19.23%
DIS Visually Handicapped O&M Support	89,728	108,544	87,667	(18,816)	-17.33%	(20,877)	-19.23%
DIS DHH Inclusion	135,001	166,018	145,427	(31,017)	-18.68%	(20,591)	-12.40%
DIS DHH Support	183,465	225,612	197,632	(42,147)	-18.68%	(27,980)	-12.40%
DIS DHH Consultation	27,693	34,055	29,831	(6,362)	-18.68%	(4,224)	-12.40%
SDC DHH Preformal	393,522	463,064	395,408	(69,542)	-15.02%	(67,657)	-14.61%
SDC DHH School Age	540,956	704,390	487,164	(163,434)	-23.20%	(217,226)	-30.84%
DIS Adapted Physical Education	547,786	755,261	541,411	(207,475)	-27.47%	(213,850)	-28.31%
Total	16,634,788	20,007,036	16,345,188	(3,372,248)	-16.86%	(3,661,848)	-18.30%
				-16.86%		-18.30%	

Appendix C

Guidelines for Requesting Special Circumstance Instructional Assistance

Rationale: Special circumstance instructional assistance (SCIA) may be indicated in situations where additional staff support is needed in the classroom or en route to and from school due to 1) pervasive and aggressive student behaviors directed towards self or others, or 2) intensive student needs.

Factors for review and consideration:

The goal for any special needs student is to encourage, promote, and maximize independence. If not carefully monitored, special circumstance instructional assistance can easily and unintentionally foster dependence. A student's total educational program must be carefully evaluated to determine where support is indicated. Natural support and existing staff support should be used whenever possible to promote the least restrictive environment.

Special factors for students residing in the:

1. All requests for SCIA shall be submitted to the Director of Special Education. SCIA should not be indicated in individual student IEP's as a service. However, in certain circumstances the need for additional support may need to be indicated in a student's IEP. In those instances, the need shall be indicated in the present levels or meeting notes as "100% supervision."
2. For services requiring additional personnel support as a result of student-related behavioral issues, a positive behavioral support plan or Behavior Intervention Plan should be developed and should include provisions describing how and when the support will be utilized to implement the plan and when the plan will be reviewed and modified, including the fading of SCI Assistance.
3. Observational assessments and team staffing will be conducted on a quarterly basis to evaluate the continued need for SCIA.

Budget coding for additional paraeducators support (classroom and/or transportation):

0100-56400-0-5750-3142-220004-XXXX-XXX

0100-65000-0-5750-1110-210004-XXXX-XXX

The appropriate code must be entered on all status forms and payroll timesheets.

The Special Education Department Accountant shall receive a copy of all SCIA requests and shall be notified routinely of all excess costs.

Process for requesting SCI Assistance:

1. Complete the Request for Special Circumstance Instructional Assistance (for Classroom Support and/or Transportation Support).
2. Complete the Observational Evaluation for SCI Assistance (For Individual Student Support only).
3. Complete the Student Needs for Additional Support Rubric (For Classroom Support, Individual Student Support and Transportation Support).
4. Complete the Class Weighting Worksheet (For Classroom Support only).
5. Attach supporting documentation if pertinent (IEP, Behavior Plan, etc.).
6. Submit all paperwork to the Director of Special Education.
7. Upon approval, complete the Request for Long-term Substitute for classroom support and/or an employee status form for transportation support (regular employee ride along).
8. All forms will be disseminated to the Special Education Accountant, Human Resources Department, Program Specialist and Special Education Director.
9. The Special Education Director will assist the site during each quarter to review the need for on-going SCIA classroom and/or transportation support.

Request for Special Circumstance Instructional Aide

Student-Related/Transportation Support

Please complete all required information and return to the Special Education Department, Director of Special Education. Notification of approval will be provided to the Program Manager, Special Education Accountant, Finance Department, and Human Resources Department.

Program _____
Teacher _____
Program Specialist _____
Date _____

Student _____
DOB _____

District of Residence _____
Classroom _____

Requested Start Date _____ *Anticipated Ending*
date _____

Transportation Provider (check one): _____ **District of Residence** _____ **First Student**

Rationale for ride-along support: (Attach additional information/documentation)

Department Approval:

Program Specialist _____ Date _____

Special Education Director _____ Date _____

Comments:

SCIA Assignment Codes:

0100-56400-0-5750-3142-220004-XXXX-XXX

0100-65000-0-5750-1110-210004-XXXX-XXX

Enter budget code:

FUND	RESOURCE	YEAR	GOAL	FUNCTION	OBJECT	DEPT.	MANAGER

SCIA: rev. 9/1/09

Observational Evaluation for SCI Assistance

Student: _____ School: _____

Teacher: _____ Date: _____

Observer's Name/Title: _____ Setting: _____

Section I: *Please complete the following review of the visual and physical structure of the classroom, curriculum design, data collection and planning.*

Posted classroom schedule _____ *Yes* _____ *No*

If yes, complete section below:

1. The following elements are included in the classroom schedule:

Times
 Students
 Staff names
 Locations
 Activities

2. The schedule is Daily Weekly Other _____

Individual student schedule _____ *Yes* _____ *No*

If yes, complete section below:

1. Student uses the following format for individualized schedule:

Object
 Photograph
 Picture
 Icon
 Word

2. Room is arranged with structure to correlate with tasks on schedule:

Area for one-to-one work
 Area for group work
 Area for independent work

Area for leisure

Not applicable

3. Student ability to follow the schedule:

Independent

Non-verbal with gestural prompt

With indirect verbal prompt

With direct verbal prompt

With physical prompt

Consistent Inconsistent

4. Student use of the schedule:

Student carries schedule

Student goes to schedule board

Student uses transition cards

Teacher carries and shows the schedule

Consistent Inconsistent

**Attach sample classroom schedule and individual student schedule*

Curriculum and instructional planning

1. Check the curricular domains included in the student's program:

Communication

Self care

Academics

Motor skills/mobility

Domestic

Social/behavioral

Pre-vocational/vocational

Recreation/leisure

Other: _____

2. Describe curricular accommodations and/or modifications currently being used:

3. List equipment or devices used /available that may relate to the need for assistance (may be low incidence equipment or assistive technology device):

4. Are materials and activities age appropriate? _____ Yes _____ No

5. Are materials and activities instructionally appropriate? _____ Yes _____ No

Current data systems and collection of data

Has data been collected on student performance? _____ Yes _____ No

If yes, complete section below:

1. Current data on each objective includes:

Date
Task
Level of independence (prompting needed)

2. Data is collected:

Daily
Weekly
Biweekly
Monthly

3. Data is summarized in the following manner:

Graphed
Written narrative
Other _____

****Attach sample***

Behavior and safety

1. Describe the behavior management system in the classroom, including positive reinforcers and consequences. Is the system appropriate for the student or does it need modification?
2. Are specific positive behavior supports utilized for the student? _____ Yes _____ No

Describe:

3. Is there appropriate safety equipment in place? _____ Yes _____ No
4. Are appropriate safety and medical procedures being used? _____ Yes _____ No
5. Does it appear appropriate training has been provided? _____ Yes _____ No

Comments:

6. Describe the student's interactions with peers:

7. Describe the student's interaction with non-classroom staff in a less structured environment:

8. What activities does the student choose during breaks?

9. What problems are evident?

Planning team meetings

1. Are team meetings held? (formal or informal meetings to problem solve) _____ Yes _____
No

If yes, complete section below:

- Daily
- Weekly
- Biweekly
- Monthly
- Need to be scheduled

2. Meetings include the following participants:

Current utilization of assistance

How is existing assistance utilized?

- Behavior management
- Curriculum adaptation and preparation
- Instruction - individual
- Instruction - group

- Medical assistance
- Supervision

Other _____

Team Summary/Action Plan

1. Can current conditions be modified to meet the student's goals and objectives and/or personal care needs? If so, how?

2. What other types of assistance are needed? Why?

3. Are there any other issues that need to be addressed?

4. Recommendations:

SCIA rev. 2/12/09

Student Needs for Additional Support Rubric

Student Name: _____ DOB: _____ Disability: _____
 Date Reviewed: _____

Teacher: _____ Current Program: _____

Select the number that best describes the student in each rubric category that is appropriate.

	<i>Health/Personal Care/Rating</i>	<i>Behavior/Rating</i>	<i>Instruction/Rating</i>	<i>Inclusion/Mainstreaming/Rating</i>
0	General good health. No specialized health care procedure, medications taken, or time for health care. Independently maintains all "age appropriate" personal care.	Follows adult directions without frequent prompts or close supervision. Handles change and redirection. Usually gets along with peers and adults. Seeks out friends.	Participates fully in whole class instruction. Stays on task during typical instruction activity. Follows direction with few to no additional prompts.	Participate in some core curriculum within general education class and requires few modifications. Can find classroom. Usually socializes well with peers.
1	Mild or occasional health concerns. Allergies or other chronic health conditions. No specialized health care procedure. Medications administration takes less than 10 minutes time. Needs reminders to complete "age appropriate" personal care activities.	Follows adult direction but occasionally requires additional encouragement and prompts. Occasional difficulty with peers or adults. Does not always seek out friends but plays if invited.	Participates in groups at instructional level but may require additional prompts, cues or reinforcement. Requires reminders to stay on task, follow directions and to remain engaged in learning.	Participates with modification and accommodation. Needs occasional reminders of room and schedule. Requires some additional support to finish work & be responsible. Needs some social cueing to interact with peers appropriately.
2	Chronic health issues, generic specialized health care procedure. Takes medication. Health care intervention for 10-15 min daily (diet, blood sugar, medication). Requires reminders and additional prompts or limited hands on assistance for washing hands, using bathroom, wiping mouth, shoes, buttons, zippers, etc. Occasional toileting accidents.	Has problems following directions and behaving appropriately. Can be managed adequately with a classroom behavior management plan, but unable to experience much success without behavior support plan implementation.	Cannot always participate in whole class instruction. Requires smaller groups and frequent verbal prompts, cues or reinforcement. On task about 50% of the time with support. Requires more verbal prompts to follow directions.	Participates with visual supervision and occasional verbal prompts. Requires visual shadowing to get to class. Needs modifications & accommodations to benefit from class activities. Regular socialization may require adult facilitation.

<p>3 *</p>	<p>Very specialized health care procedure and medication. Limited mobility. Physical limitations requiring assistance (stander, walker, gait trainer or wheelchair). Special food prep or feeding. Health related interventions 15-45 min. daily. Frequent physical prompts and direction assistance for personal care. Food prep required regularly. Requires toilet schedule, training, direct help, diapering.</p>	<p>Serious behavior problems almost daily. Defiant and/or prone to physical aggression. Requires a Behavior Intervention Plan (BIP) and behavior goals and objectives on the IEP. Requires close visual supervision to implement BIP. Medication for ADD/ADHD or other behaviors.</p>	<p>Difficult to participate in a large group. Requires low student staff ratio, close adult proximity and prompts including physical assistance to stay on task. Primarily complies only with 1-to-1 directions & monitoring. Cognitive abilities & skills likely require modifications not typical for class as a whole. Needs Discrete Trial, ABA, Structured Teaching, PECS. Requires signing over 80% of time.</p>	<p>Participation may require additional staff for direct instructional and behavioral support. Requires direct supervision going to & from class. Always requires modifications & accommodations for class work. Requires adult to facilitate social interaction with peers.</p>
<p>4 *</p>	<p>Specialized health care procedure requiring care by specially trained employee (G tube, tracheotomy, catheterization.) Takes medication, requires positioning or bracing multiple times daily. Health related interventions 45 min. daily. Direct assistance with most personal care. Requires two-person lift. Direct 1-to-1 assistance 45 or more minutes daily.</p>	<p>Serious behavior problems with potential for injury to self and others, runs-away, aggressive on a daily basis. Functional Analysis of Behavior or Hughes Bill has been completed and the student has a well-developed BIP, which must be implemented to allow the student to safely attend school. Staff has been trained in the management of assaultive behaviors.</p>	<p>Cannot participate in a group without constant 1-to-1 support. Requires constant verbal and physical prompting to stay on task and follow directions. Regularly requires specific 1-to-1 instructional strategies to benefit from the IEP. Cognitive abilities and skills require significant accommodation and modification not typical for the class group.</p>	<p>Always requires 1-to-1 staff in close proximity for direct instruction, safety, mobility or behavior monitoring. Requires 1-to-1 assistance to go to and from class 80% of the time. Requires adult to facilitate social interaction with peers and remain in close proximity at all times.</p>

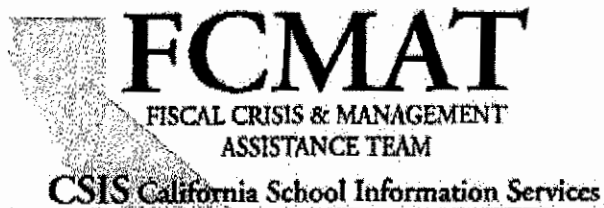
***Attach a copy of documentation indicating frequency and duration over a period of time to determine further consideration of special circumstance instructional assistance. If mostly ratings of 3's & 4's, in two or more areas, continue with needs assessment process.**

Techniques to Promote Independence and Fading of Support

1. Watch before assisting. Can the student ask for help from teacher or peer?
2. Can the student problem solve independently?
3. Give the student extra time to process and respond before assisting.
4. Provide consistent classroom schedule (posted, visual, at desk if needed, reinforcement periods included). Teach the student how to use it.
5. Start with the least intrusive prompts to get the student to respond:
 - A. Gestural, hand or facial signals
 - B. Timer
 - C. Verbal
 - D. Light physical
 - E. Hand over hand
6. Prompt, then back away to allow independent time.
7. Use strengths and weaknesses, likes and dislikes to motivate student participation and interest.
8. Model; guide (watch and assist); check (leave and check back).
9. Teach independence skills (raising hand, asking for help, modeling other students).
10. Praise for independent attempts.
11. Direct the student to answer to the teacher.
12. Prompt the student to listen to the teacher's instructions. Repeat only when necessary.
13. Encourage age appropriate work habits. See what other students are doing.
14. Be aware of proximity. Sit with the student only when necessary.
15. Encourage peer assistance and partnering. Teach peers how to help, not enable.
16. Utilize self-monitoring checklists for student.
17. Color code materials to assist with organization.
18. Use transition objects to help the student anticipate/complete transition (i.e., head phones for listening center).

19. Break big tasks into steps.
20. Use backward chaining (i.e., leaves the last portion of a cutting task for the student, and then gradually lengthens the task).
21. Assist in encouraging a means for independent communication (i.e., PECS).
22. Provide positive feedback (be specific to the situation).
23. Ask facilitative questions (“What comes next?” “What are other students doing?” “What does the schedule say?” “What did the teacher say?”).
24. Give choices.

Appendix D



FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM STUDY AGREEMENT

June 28, 2011

The FISCAL CRISIS AND MANAGEMENT ASSISTANCE TEAM (FCMAT), hereinafter referred to as the Team, and the Stanislaus County Office of Education hereinafter referred to as the COE, mutually agree as follows:

1. BASIS OF AGREEMENT

The Team provides a variety of services to school districts and county offices of education upon request. The COE has requested that the Team provide for the assignment of professionals to study specific aspects of the County operations. These professionals may include staff of the Team, County Offices of Education, the California State Department of Education, school districts, or private contractors. 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. Review the current SELPA structure with the SCOE as the AU and analyze the pros and cons of having a district take over the AU duties of running the SELPA. Determine the fiscal and programmatic consequences, the timeframes for proper notification to the current AU and CDE, the processes and procedures necessary for any such transfer of the AU duties.
2. Review the current SELPA structure with regard to the delivery of Regionalized Programs and Services. Determine the fiscal and programmatic consequences of having a school district assume responsibility (take-back) the running all 33 RP currently run by the SCOE. Specifically identify the pros and cons of such a take-back. Additionally, determine what steps are necessary to take for effective transfer of program operation/delivery from SCOE to a district run operation.
3. Analyze the present AB 602 funding model, and make recommendations, if necessary, that would make the formula more equitable, in both the current SELPA structure and if a district were the AU of the SELPA.

4. Analyze the present Fee for Service funding model, and make recommendations, if necessary that would make the FFS model more equitable for all districts, in both the current SELPA structure and if a district were the AU of the SELPA.
5. Review student caseload status of the 9 regional operating programs and the fiscal effects of their operations.
6. Review COE special education operated programs and determine whether some programs would be more cost-effective if operated by participating districts.
 - a. Determine the capacity of districts to operate additional programs (such as facilities, staffing etc.)
7. Review all current staffing levels for certificated and classified employees, including management level and caseloads per full time equivalent (FTE) position of all COE programs and make recommendations regarding efficiency.
8. Analyze COE special education classified and certificated staffing formulas and caseloads, salaries and benefits and compare with legal requirements, statewide averages and county averages.
9. Perform a fiscal review of the cost of special education programs, with the intent of developing a “defendable professional standard” or baseline for staffing and providing services per program offered by the COE’s Special Education Department.
10. Evaluate and recommend staffing ratios of all special education support staff including but not limited to school psychology, speech, occupational, adaptive PE, and occupational therapists based on “defendable professional standards.”
11. Review the SELPA policy and procedures for providing Para-professionals; including staffing ratios to determine whether the process is cost effective and make recommendations to improve efficiency and effectiveness.
12. Conduct a review and analysis, and provide recommendations for the county special education program operation and service delivery including but not limited to:
 - The efficiency and effectiveness of the county office’s special education fiscal and program delivery system.
 - Legal costs and Due process at the SCOE and district level, determine costs involved

B. Services and Products to be Provided

1. Orientation Meeting - The Team will conduct an orientation session at the COE to brief COE management and supervisory personnel on the procedures of the Team and on the purpose and schedule of the study.
2. On-site Review - The Team will conduct an on-site review at the COE office and at school sites if necessary.
3. Progress Reports - The Team will hold an exit meeting at the conclusion of the on-site review to inform the COE of significant findings and recommendations to that point.
4. Exit Letter - The Team will issue an exit letter approximately 10 days after the exit meeting detailing significant findings and recommendations to date and memorializing the topics discussed in the exit meeting.
5. Draft Reports - Sufficient copies of a preliminary draft report will be delivered to the COE administration for review and comment.
6. Final Report - Sufficient copies of the final study report will be delivered to the COE following completion of the review. The final report will be published on the FCMAT website.
7. Follow-Up Support – Six months after the completion of the study, FCMAT will return to the COE, if requested, to confirm the COE's progress in implementing the recommendations included in the report, at no cost. Status of the recommendations will be documented to the COE in a FCMAT Management Letter.

3. PROJECT PERSONNEL

The study team will be supervised by Anthony L. Bridges, CFE, Deputy Executive Officer Fiscal Crisis and Management Assistance Team, Kern County Superintendent of Schools Office. The study team may also include:

A.	<i>Dr. William Gillaspie</i>	<i>FCMAT Chief Management Analyst</i>
B.	<i>James Kennedy</i>	<i>FCMAT Consultant</i>
C.	<i>Anne Stone</i>	<i>FCMAT Consultant</i>
D.	<i>JoAnn Murphy</i>	<i>FCMAT Consultant</i>
E.	<i>Trina Frazier</i>	<i>FCMAT Consultant</i>
F.	<i>Trish Small</i>	<i>FCMAT Consultant</i>
G.	<i>Drew Sorensen</i>	<i>FCMAT Consultant</i>

Other equally qualified consultants will be substituted in the event one of the above noted individuals is unable to participate in the study.

4. PROJECT COSTS

The cost for studies requested pursuant to E.C. 42127.8(d)(1) shall be:

- A. \$500.00 per day for each Team Member while on site, conducting fieldwork at other locations, preparing and presenting reports, or participating in meetings.
- B. All out-of-pocket expenses, including travel, meals, lodging, etc. The COE will be invoiced at actual costs, with 50% of the estimated cost due following the completion of the on-site review and the remaining amount due upon acceptance of the final report by the COE.

Based on the scope of work identified in section 2 A, estimated total cost is \$29,500.

- C. Any change to the scope will affect the estimate of total cost.

Payments for FCMAT services are payable to Kern County Superintendent of Schools-Administrative Agent.

5. RESPONSIBILITIES OF THE COE AND SELPA

- A. The COE or SELPA will provide office and conference room space while on-site reviews are in progress.
- B. The COE or SELPA will provide the following (if requested):
 - 1. A map of the local area
 - 2. Existing policies, regulations and prior reports addressing the study request
 - 3. Current or proposed organizational charts
 - 4. Current and two (2) prior years' audit reports
 - 5. Any documents requested on a supplemental listing
 - 6. Any documents requested on the supplemental listing should be provided to FCMAT in electronic format when possible.
 - 7. Documents that are only available in hard copy should be scanned by the district and sent to FCMAT in an electronic format.
 - 8. All documents should be provided in advance of field work and any delay in the receipt of the requested documentation may affect the start date of the project.

- C. The members of the Superintendent's Council will review a preliminary draft copy of the study. Any comments regarding the accuracy of the data presented in the report or the practicability of the recommendations will be reviewed with the Team prior to completion of the final report. The final report will be posted on the FCMAT website.

Pursuant to EC 45125.1(c), representatives of FCMAT will have limited contact with pupils. The COE and SELPA shall take appropriate steps to comply with EC 45125.1(c).

6. PROJECT SCHEDULE

The following schedule outlines the planned completion dates for key study milestones:

<i>Orientation:</i>	<i>July 25, 2011</i>
<i>Staff Interviews:</i>	<i>July 25-29, 2011</i>
<i>Exit Interviews:</i>	<i>July 29, 2011</i>
<i>Preliminary Report Submitted:</i>	<i>to be determined</i>
<i>Final Report Submitted:</i>	<i>to be determined</i>
<i>Board Presentation:</i>	<i>to be determined</i>
<i>Follow-Up Support:</i>	<i>if requested</i>

7. CONTACT PERSON

Name of contact person: Don Gatti, Assistant Superintendent, Business

Telephone (209) 238-1708 FAX _____

E-mail: dgatti@stancoc.org

Tom Changnon 6-29-11
 Tom Changnon, Superintendent Date
 Stanislaus County Office of Education

Anthony Bridges June 28, 2011
 Anthony Bridges, CFE Date
 Deputy Executive Officer
 Fiscal Crisis and Management Assistance Team

