

# Campbell Union High School District

## Special Education Study

November 1, 2018

Prepared by:

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Director, Management Consulting Services

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Vice President



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## Table of Contents

<b>Executive Summary .....</b>	<b>1</b>
<b>Study, Scope, and Methodology .....</b>	<b>2</b>
<b>Background.....</b>	<b>3</b>
<b>Organizational Effectiveness .....</b>	<b>5</b>
Leadership and Culture .....	6
Organizational Efficiency .....	9
▪ Roles and Responsibilities.....	9
▪ Policies and Procedures .....	9
Organizational Structure .....	10
▪ Administrator .....	11
▪ Program Specialist .....	12
▪ Administrative Assistant/Clerical.....	13
<b>Recommendations—Organizational Effectiveness .....</b>	<b>13</b>
<b>Special Education Revenues and Expenditures.....</b>	<b>16</b>
Special Education Funding History.....	16
▪ Background .....	16
▪ Equity Funding .....	17
▪ Contributions .....	18
<b>Special Education Local Plan Area .....</b>	<b>20</b>
District Special Education Revenues .....	21
Program Expenditures .....	22
▪ Transportation .....	27
Budget Planning and Maintenance of Effort .....	33
<b>Recommendations—Revenues, Expenditures, and Transportation .....</b>	<b>33</b>
<b>Special Education Programs.....</b>	<b>33</b>
History of Special Education Programs.....	34

Special Education Cost Drivers.....	35
▪ Number of Students Served.....	36
▪ Pre-Referral Interventions .....	38
▪ Disproportionality.....	39
Continuum of Placement Options.....	40
<b>Recommendations—Special Education Programs .....</b>	<b>43</b>
<b>Special Education Staffing.....</b>	<b>45</b>
Comparative Analysis of Pupil Personnel and Designated Instructional Support Staffing.....	45
▪ School Psychologist.....	45
▪ Speech and Language Pathologist .....	47
▪ Behavior Specialist.....	48
Program Staffing Levels .....	48
▪ Teaching Staff .....	49
▪ Paraprofessionals.....	50
<b>Summary and Conclusions .....</b>	<b>51</b>
<b>Appendix A: Program and Staffing Surveys Completed by the District .....</b>	<b>53</b>
<b>Appendix B: Sample Transportation Decision-Making Trees .....</b>	<b>63</b>
Sample 1.....	63
Sample 2.....	64

## Executive Summary

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The Campbell Union High School District (District) requested that School Services of California, Inc., (SSC) review its Special Education Programs (Programs) to offer an assessment of, and recommendations on, how the District can improve the delivery of programs and services to students with disabilities. Our collection and analysis of data from districts similar in size and demographics compares the resources, incidence of disabilities, and staffing costs to that of the District using state-certified data.

We found the District leadership team to be student-centered and focused on outcomes for student achievement. The program staff has a great deal of pride in the quality of work they do, and the data shows the overall number of students identified for Special Education is being reduced through staff efforts. The District has transferred programs from the Santa Clara County Office of Education back to the District, as well as reduced the number of students served in outside placements. Student interventions and inclusive practices are being implemented to assist students who need additional resources. Over time, these practices may reduce the number of students eligible for Special Education because their needs are being met through these intervention programs. Overall staffing, revenue, and expense comparisons were made to similar districts to provide a basis for determining efficiencies. The data shows that the District has a higher-than-average contribution from the General Fund to support the Special Education Programs, despite a lower-than-average population of students with disabilities.

The following report will provide the detail for both the student population and the cost of the programs for the District as well as the comparative data.

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## Study, Scope, and Methodology

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Creating cost-effective, high-quality Special Education programs is a concern for virtually every school district in California. There has been a long-standing gap between the funding that is provided to operate Special Education programs and the cost to actually provide services, but in recent years the gap has grown. For most school districts, the widening gap can be attributed to rapidly rising costs due to a growing incidence of children with higher-cost disabilities (such as autism), litigation, and employee compensation coupled with little to no growth in Special Education revenues.

The Campbell Union High School District (District) requested that School Services of California, Inc., (SSC) review its Special Education Programs (Programs) to offer an assessment of, and recommendations on, how the District can improve the cost effectiveness of its Programs. This study used a multifaceted approach to first understand the issues facing the District's Programs and then recommend changes to help the District operate cost-effective, high-quality, and legally compliant Programs. This approach consisted of the following steps:

- Analysis of District-level data related to the Programs, including financial information, pupil counts, class sizes, and caseloads
- Collection and analysis of data from districts of similar type and size to compare staffing levels and costs
- Interviews with District staff, including executive staff, Special Education administrators, Special Education teachers, psychologists, speech and language pathologists (SLPs), principals, and classified staff
- Site visitations

Our collection and analysis of data from districts similar in size and demographics compares the resources, incidence of disabilities, and staffing costs to that of the District using state-certified data. Thirteen comparative districts were identified by SSC in consultation with the District. High school-only districts are more difficult for comparisons because there are so few in the state. We included 6 unified school districts in the 13 comparative districts originally identified.

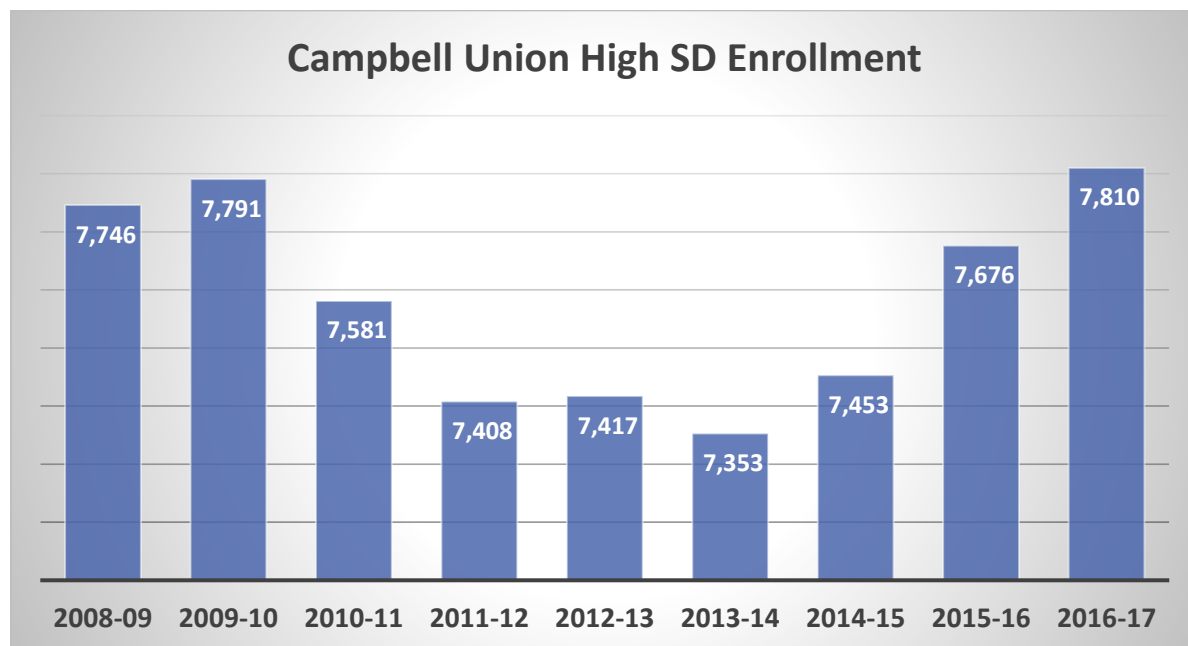
Comparative current-year staffing data is based on a survey of the comparative group. Responding to the staffing survey is completely voluntary and can be difficult to obtain—we normally expect half of the comparative districts to volunteer and submit data. For this study, 6 of the 13 comparative districts provided the requested staffing data. We are able to access some statewide data for incidence of disabilities, revenue, and expenses for additional comparisons in certain areas. The participating comparative group of districts includes the following:

- Castro Valley Unified School District (SD)
- Fremont Union High SD
- Liberty Union High SD
- Los Gatos-Saratoga Union High SD
- Morgan Hill Unified SD
- South San Francisco Unified SD

## Background

The District has had moderate growth in the recent past and all indications are that moderate growth will continue. Figure 1 shows the changes in student enrollment over a nine-year period, based upon data reported to the California Department of Education (CDE) by the District.

**Figure 1: Enrollment**

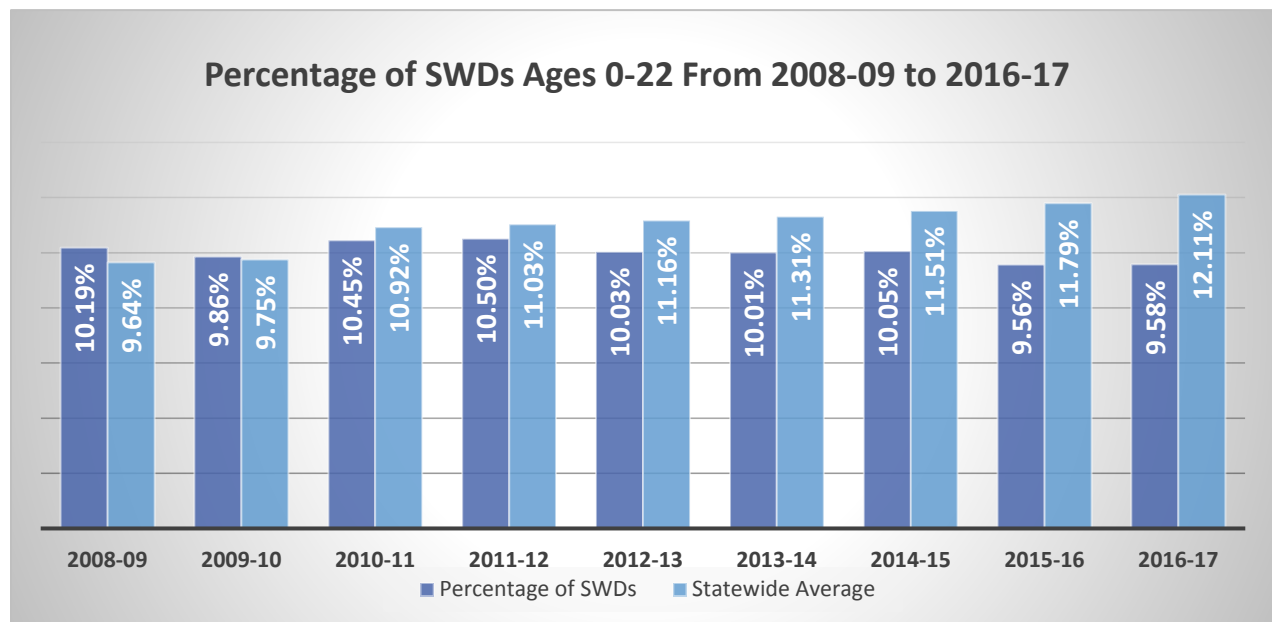


Source: CDE state-certified data

Although the District is a community funded district (meaning local property taxes provide most of the revenue), enrollment growth does not equate to additional revenue. As the District's total enrollment declines or grows, it is expected that the number of students with disabilities (SWDs) will grow or decline at a similar rate. During periods of significant growth or decline, enrollment

in SWDs may or may not increase or decrease at the same rate depending on where the change in enrollment is occurring (e.g., preschool, elementary, secondary) and can be somewhat erratic until such time as enrollment levels off. While the District is continuing to grow, the number of SWDs has declined. In addition to reviewing the growth or decline in the number of SWDs, we must also examine whether or not the rate of growth or decline is proportionate to overall enrollment losses or gains. Figure 2 illustrates the growth in enrollment and the decline in SWDs over time. Figure 3 compares enrollment changes and the extent to which the changes in the number of SWDs is proportionate to overall enrollment changes based upon data reported to the CDE by the District. The data shows that the number of SWDs has remained below the statewide average for the last seven years.

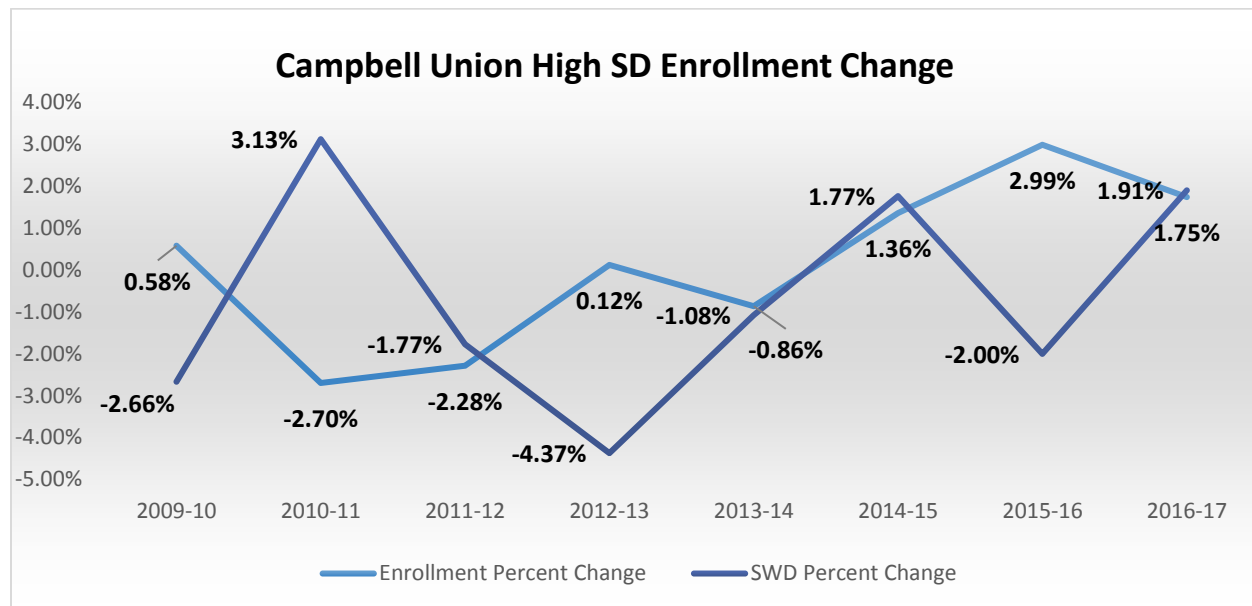
**Figure 2: Growth in SWDs**



Source: CDE state-certified data



Figure 3: Comparison of Enrollment Changes of SWDs Ages 0-22



Source: CDE state-certified data

As Figure 3 indicates, the District has reached (in 2016-17) nearly the same percentage change in enrollment as the percentage change in SWDs. This is considered to be the equilibrium between general education and Special Education enrollments. Fluctuations in enrollment impact overall funding, as the funding base is average daily attendance (ADA) for all students. These fluctuations also impact staffing needs and caseloads/class sizes. It is important that the Director of Special Education (Director) is included in enrollment meetings and updates to plan for fluctuations in the entire student population in order to prepare for program changes and staff movement, if needed.

## Organizational Effectiveness

The ability of the District to provide effective instructional programs that meet the needs of students in the most cost-effective manner is dependent upon its ability to build a strong culture where organizational values and expectations are shared and there is a commitment to investing in employees and operational effectiveness. This is true of all programs, including those that serve SWDs.

In assessing organizational effectiveness we assessed leadership and culture, organizational efficiency, and organizational structure. In assessing these areas, we asked the following essential questions:

- Is the inclusion of SWDs an organizational value and/or expectation that is widely held and what impact, if any, does this have on productivity, operational efficiency, and personal and organizational satisfaction?
- Does the current level of Special Education Department (Department) staffing meet existing service demands?
- Are the roles and responsibilities of both District Office and school site staff appropriately allocated and clearly defined?
- Do current policies and procedures ensure operational efficiency and support effective program delivery?
- Are roles and responsibilities, as well as policies and procedures, well communicated, and are there systems of accountability to ensure consistency across the District?

## Leadership and Culture

Leadership and organizational culture play a pivotal role in the District's ability to achieve established goals. The collective attitudes, values, and behaviors of individuals and groups within any organization, and the traditions and norms they share, determine its culture. A strong organization is one where organizational values and expectations are aligned with those of individuals and groups, resulting in high productivity, operational efficiency, and personal and organizational satisfaction. Leaders are responsible for shaping and nurturing a culture that supports the ongoing growth and development of the organization and its most valuable asset—its employees. Figure 4 depicts the pyramid of organizational effectiveness, beginning with the strong foundation of a shared purpose.

Figure 4: Organizational Culture and Program Effectiveness



Organizational culture, or the collective attitudes, values, and behaviors of individuals and groups within an organization, or a department within an organization, is indicative of its leadership.

We found the District leadership team to be student-centered and focused on outcomes for student achievement. The organizational culture, or the extent to which the organization values the inclusion of SWDs, cannot be attributed to the current leadership within the District or the Department; rather, it is indicative of leadership instability. The Director has only been in her position for four months and came to the position from within the District. The Superintendent; Assistant Superintendent, Business Services; and Chief Human Resources Officer—although experienced—are all relatively new to the District as well. Transitions in key staff roles can lead to leadership instability, which can in turn negatively impact staff morale and create frustration, dissatisfaction, and mistrust among staff. We found some of this to be the case in the District given leadership turnover. Staff we interviewed were concerned about the number of students on 504s

and how the interaction between accommodations and Special Education eligibility are managed. Staff felt as if the message was not consistent and/or not consistently conveyed to all staff. The turnover rate of teachers was another area where staff felt that the gaps in leadership were contributing.

We did, however, find that most staff have a great deal of pride in the quality of work they do and the data shows the overall number of students identified for Special Education is being reduced through staff efforts. The District has transferred programs from the Santa Clara County Office of Education back to the District, as well as reduced the number of students served in outside placements. With regard to general education, the District has increased the rigor of graduation requirements to an all a-g (Education Code Section [E.C.] 51220) curriculum, which some staff believe is leading to increased referrals for Special Education. However, there is no data to suggest that this is the case. Should this be a concern for the District, we suggest that the District examine referral data over the last several years, particularly initial referrals at the high school level, as well as track referral data moving forward. The District has implemented additional intervention courses and resources to prevent the requirements from having a negative impact on students. The Director should be included in enrollment projection meetings, as well as master scheduling meetings to ensure that SWDs are accessing appropriate programs and to project future department staffing needs.

The District experienced an additional transition as the Program Manager and a Program Specialist are also new to their positions for the 2018-19 school year. The new administrators may encounter some reluctance to support new initiatives as the myriad of staff and program changes lead to what is termed “transition fatigue.” This fatigue, and the lack of confidence staff may have in the changes implemented by the new leaders, can be mitigated through clear and consistent communication and implementation that is supported with resources and/or training.

The District should also recognize that an increased statewide focus on Individuals with Disabilities Education Act (IDEA) compliance is requiring additional compliance measures each year. These tasks fall to the Director and will take time away from staff support and training. It is important that the Director be visible and accessible to staff, but it is equally important that reports and compliance measures are timely and accurate.

## **Organizational Efficiency**

### **Roles and Responsibilities**

Role clarity is a prerequisite for organizational effectiveness and individual and/or team performance. For an organization or department within an organization to succeed, employees and leaders need to not only know their jobs and perform them well, they need to understand their roles as a part of the larger team.

Employees need to also understand the roles of those they work with and, in particular, the role that leaders play and how each supports the other. Role clarity can eliminate the duplication of effort as well as ensure that essential tasks aren't overlooked. The benefits of gaining role clarity are numerous, including increased efficiencies, improved individual and group performance, and job satisfaction. Role ambiguity can be a source of stress to individuals, teams, departments, and organizations.

Staff we interviewed consistently reported that roles and responsibilities are unclear. The staff expressed that reporting authority was unclear and that there was an inconsistency in directives provided or not provided to staff on school sites. Leadership instability in the District Office has resulted in a general sense of uncertainty around who does what in the Department. Without a clear understanding of the Departmental structure, roles, and responsibilities, site staff will tend to rely on the site administration, other staff, or their own instinct, which can lead to feelings of isolation, frustration, and stress. Often times this will also lead to a high number of workplace injuries or illnesses. However, we did not find the claims to be high; we actually saw a decrease in the number of claims within the Department over the last two years. We did find that there is a lack of role clarity among the sites, and in particular with the Individualized Education Plan (IEP) administration. It was reported that IEPs are not always chaired by a site administrator and that at times it may be a last-minute switch as to who can chair the meeting.

### **Policies and Procedures**

Policies are the rules, principles, and guidelines used to reach the goals in an organization. Procedures are the steps taken daily to support those policies. Well-communicated policies and procedures facilitate consistency across the organization and support operational efficiency. Policies and procedures are the link between the District's core mission and its day-to-day operations and answer the "What?" and "How?" of an individual's or group's assigned work. Well-written policies and procedures allow employees to understand their roles and responsibilities, while allowing management to guide operations without constant intervention. Additionally, well-written policies and procedures:

- Ensure consistent implementation of effective practices

- Increase efficiencies
- Reduce potential errors and mitigate risks
- Allow managers to hold employees accountable to predetermined standards

A good policy is explicit in nature and will offer clear and concise direction to staff. Policies are designed to help employees learn to comply and what to do if they can't. At the same time, policies must not be as rigid or out-of-date as to not offer discretion to management. Policies are not effective if not communicated.

During our interviews, we learned that, in the past, policies and procedures were not consistently applied to similar situations, making it difficult for staff to fully understand or communicate policy requirements. With few exceptions, staff recommended that there be more standardization in processes, particularly for the Student Study Team (SST) among all sites and the procedures for adding Instructional Assistants (IAs). Although SSTs are intended to identify intervention strategies prior to assessments for Special Education, some staff felt that the SSTs are a direct path to Special Education services.

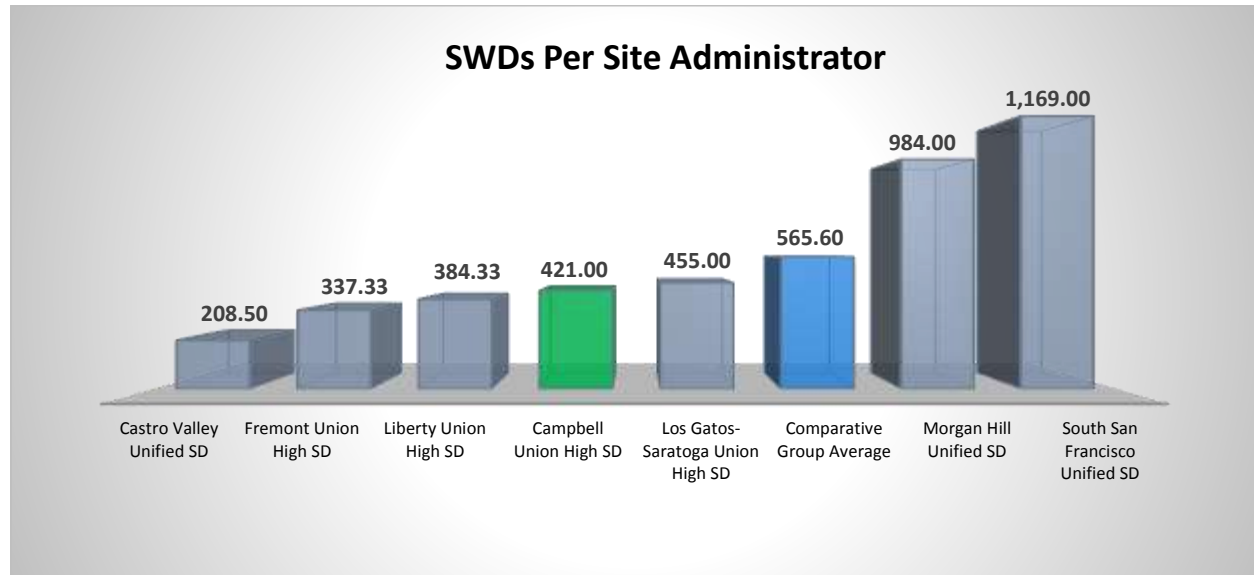
## Organizational Structure

The Director is supported by 1.0 full-time equivalent (FTE) Special Program Manager and 1.0 FTE Service Clerk III. The Director reports to the Assistant Superintendent for Educational Services and supervises all Department staff. The Department oversees services to 842 SWDs. The data in this section is based upon District responses to program and staffing surveys included in Appendix A.

### Administrator

Figure 5 compares District staffing ratios of SWDs per site administrator to districts in the comparative group who provided staffing data and who reported employing administrators. Administrators do not include support staff, school psychologists, program specialists, or any other position reported elsewhere in this report as the comparison that follows only compares staff that are responsible for the operation, direction, and oversight of Special Education programs. At a ratio of 421:1, the District employs more administrators relative to its Special Education student population than three of the comparative districts—Los Gatos-Saratoga Union High SD, Morgan Hill Unified SD, and South San Francisco Unified SD—and more than the average of the comparative group.

**Figure 5: SWDs Per Site Administrator**

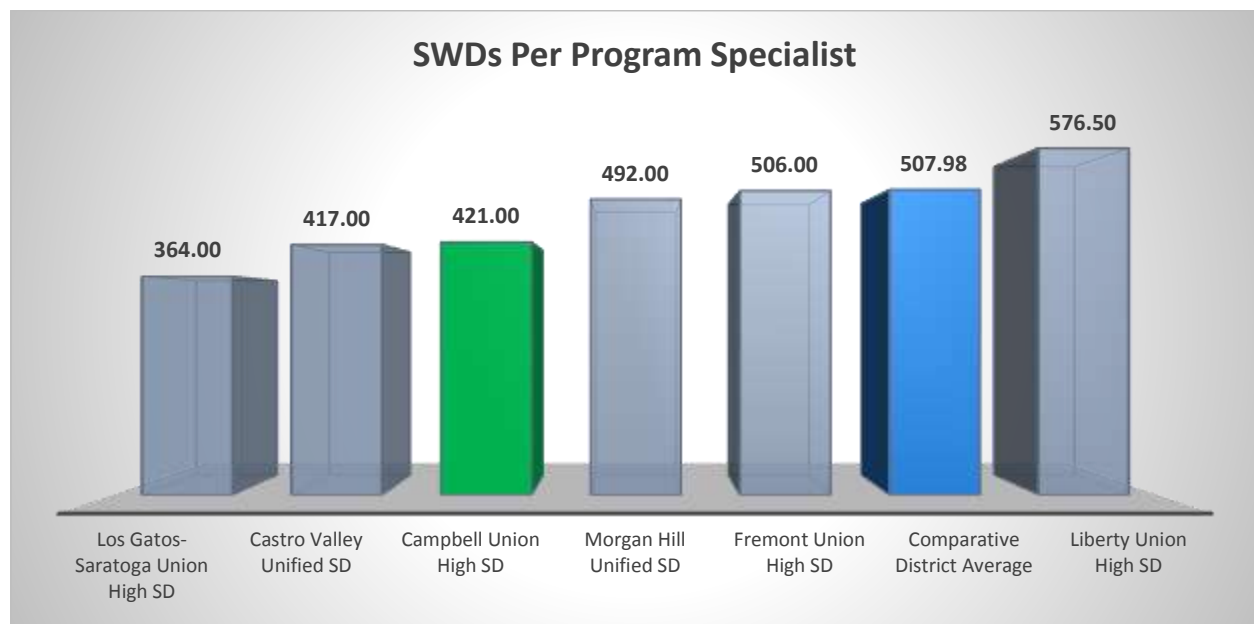


Source: District-provided staffing data for 2017-18 and comparative district survey data

### Program Specialist

Figure 6 compares District staffing ratios of SWDs per program specialist to districts in the comparative group who provided staffing data and who reported employing program specialists. Liberty Union High SD reported employing the job classification of coordinators as being similar in qualifications and duties as the program specialists. Castro Valley Unified SD and Los Gatos-Saratoga Union High SD reported their program specialists as nonmanagement while the remaining districts in the comparison group, including the District, reported program specialists as management. The District's program specialists are included in Figure 6 and not in Figure 5. At a ratio of 421:1, the District employs more program specialists relative to its Special Education student population than three of the comparative districts—Morgan Hill Unified SD, Fremont Union High SD, and Liberty Union High SD— and more than the average of the comparative group.

**Figure 6: SWDs Per Program Specialist**



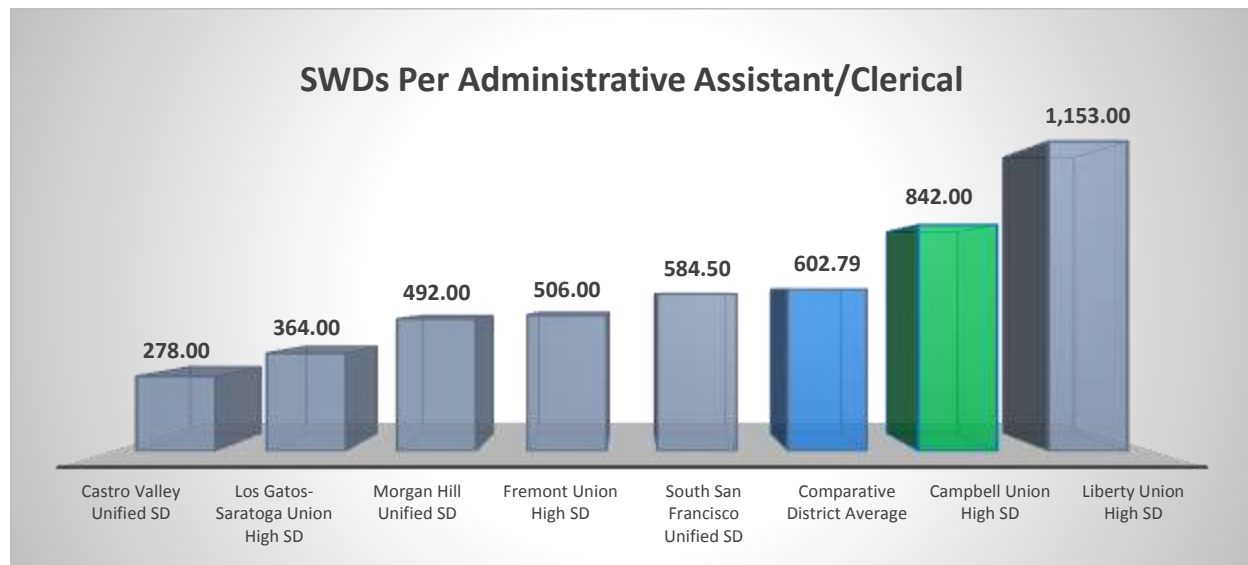
Source: District-provided staffing data for 2017-18 and comparative district survey data



### Administrative Assistant/Clerical

Figure 7 compares District staffing ratios for administrative assistant/clerical staff to districts in the comparative group who reported employing administrative assistant/clerical staff. At a ratio of 842:1, the District's administrative assistant/clerical staffing ratio is above the comparative group average, indicating that it employs fewer administrative assistant/clerical staff relative to its student population than all but one of the comparative districts.

**Figure 7: SWDs Per Administrative Assistant/Clerical**



Source: District-provided staffing data for 2017-18 and comparative district survey data

## Recommendations—Organizational Effectiveness

1. **Include the Director in enrollment and staffing meetings at the District level.** This is to ensure the necessary information for making and communicating the need for changes in program and staffing moves is clear to all District Administration.
2. **Increase communication during transitions.** As a new Director and staff begin their work, communicate often with staff and sites and ensure that practices, policies, and procedures are monitored for uniformity and consistency. Also provide for a feedback loop to make changes as needed or appropriate to practices to ensure needs of the site and the students are met.
3. **Implement clear and concise policies and procedures.** Well-communicated policies and procedures facilitate consistency across the organization and support operational efficiency and the effective delivery of programs. The development of a Department procedures manual would go a long way in making roles, responsibilities, and expectations more clear as well as clearly communicating Department policies, procedures, and practices. Once developed and

implemented, the Department will need to develop systems of accountability to ensure that policies and procedures are implemented consistently.

The development of Department policies and procedures should be led by the Director. The development of the policies and procedures and the compiling of a Special Education Procedures Manual should be a collaborative effort between Department and school site staff and should include a cross section of site administrators, teachers, IAs, and include at a minimum one representative from each designated instructional support (DIS) discipline (e.g., SLP, school psychologist, behaviorist). We would recommend that the district review the Desert Sands Unified SD manual, which can be found at <https://sites.google.com/a/desertsands.us/sped-policies/> as it contemplates the contents of the manual. The Desert Sands Unified SD manual contains links to all related forms and is organized as follows:

- **Chapter 1: Useful Information**—contains information related to the district, the school calendar, district map, and district telephone directory. It also includes Special Education information including, but not limited to: a district staffing list, including psychologists, speech/language pathologists, and other support staff such as the orthopedic impairment specialist, assistive technology specialist, etc.; program specialist assignments; and a feeder chart for Elementary Mild/Moderate special day class (SDC) programs.
- **Chapter 2: Miscellaneous Forms with Directions**—forms and directions related to leave requests, conference requests, purchasing, and mileage reimbursement.
- **Chapter 3: Assessment/Evaluation**—procedures that include, but are not limited to, referring school-aged students for possible assessment, occupational therapy (OT) and physical therapy (PT) referrals, and manifestation determinations.
- **Chapter 4: Early Childhood Referral and Programs**
- **Chapter 5: IEP Information**—procedures answer the following questions: Why are IEPs held? Who attends IEPs? How are meetings scheduled? How are timelines maintained?
- **Chapter 6: Procedures for Special Services**—including, but not limited to, procedures related to extended school year, transportation, and home/hospital instruction.
- **Chapter 7: Related Services for Students with IEPs**—procedures related to OT/PT, SLP and speech-language pathologist assistant (SLPA) services, adapted physical education (APE), 1:1 instructional aide support, and behavior and low-incidence services.

- **Chapter 8: Behavior Supports**—includes a link to an educationally related mental health services handbook.

While we find the Desert Sands Unified SD manual to be user friendly and comprehensive, it does not provide the specificity we would recommend related to procedures for adding a 1:1 special circumstances IA. The lack of clear policies and procedures in this area can make defending against demands for 1:1 assistants more challenging. It can lead to IEP teams adding 1:1 assistants when additional training of existing staff, for example, may have been a more effective solution. We recommend that the District develop and adopt a policy for requesting additional hours or positions that includes:

- Reasons for request (e.g., short-term transition, medical, behavioral, etc.)
- What interventions have been undertaken—and what were the results
- Desired outcomes (could be part of behavior, health, or inclusion plan)
- Specific description of paraprofessional services and goals to be provided
- Clear delineation of who is authorized to approve new paraprofessionals
- A plan to reevaluate pupil's or program's needs periodically (e.g., fade-out policy)
- Establish support activities for teachers to try prior to requesting additional paraprofessionals including, but not limited to, the following:
  - Implement systematic training on use of paraprofessionals along with ongoing support/training for paraprofessionals
  - Cross-train paraprofessionals
  - Provide intensive training for existing paraprofessionals before adding new ones
  - Use a variety of staff to decrease dependency on one person
  - Explore alternatives, such as cross-age, peer tutoring, volunteers, class credit, etc.
  - Require redeployment of paraprofessionals after need changes

## **Special Education Revenues and Expenditures**

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### **Special Education Funding History**

#### **Background**

The current funding structure, commonly referred to as Assembly Bill (AB) 602 (AB 602 was the legislation that passed the funding formula) replaces an 18-year-old formula. The old funding model was referred to as the J-50 funding model and was based upon unit rates and support ratios. This model encouraged identification of SWDs; essentially, the more SWDs receiving Special Education services, the more the local educational agency (LEA) would receive in state funding. The authors of AB 602 had an interest in eliminating this incentive as well as creating a less complicated funding model. AB 602 was introduced and signed into law in 1997 and took effect for the 1998-99 school year.

Under AB 602, funding is based on ADA, not the number of students being served in Special Education. AB 602 assumes that the percentage of SWDs will be similar across all LEAs. To convert to the new formula, the state aggregated most of the Special Education funding and then divided by the 1997-98 ADA for each Special Education Local Plan Area (SELPA). The funding is allocated through the SELPA rather than directly to the districts.

A statewide target became common vernacular based upon the 1997-98 statewide average rate per ADA. Each year the cost-of-living adjustment (COLA) is based upon the percent increase to the statewide target and converted to a uniform dollar amount per SELPA.

Base funding for Special Education included in AB 602 is as follows:

- State aid (after deficit) for Special Education for ages 5-22 and 3-4 year-old preschoolers
- Longer Day/Longer Year
- Nonpublic School (NPS) Pilot (for those districts that participated in the program)
- Funded Phase I Equity Revenue
- Public Law (PL) 94-142 funds for ages 5-22
- Federal funds for county office continuous year and juvenile court schools
- Property tax for Special Education
- Extended School Year

- NPS/Nonpublic Agency (NPA) funding

## **Excluded funding sources:**

- State aid for Infant Units
- Property Tax for Infant Programs
- State aid for SELPA Administrative Units (including Regional Services/Program Specialists)
- State aid for NPS/NPA and Licensed Children's Institutions (LCI)
- All federal aid for preschoolers (PL 94-142 and 99-457)
- Federal aid for low-incidence, staff development, and workability

## **Not funded:**

- Emergency LCI (approximately \$1 million; affected 9 SELPAs negatively)

## **Equity Funding**

In the adoption of the new funding formula, there was a movement to provide equity among all SELPAs. The equity process became known as implementation phases. Attempts at equity are now known as the following four phases:

Phase I—Low-funded LEAs received equity funding in 1997-1998

Phase II—The conversion to the per-ADA model became known as Phase II

Phase III—Further funding to SELPAs with below-average funding per ADA

Phase IIIA—Additional funding for high-need SELPAs (considered a level up)

SELPA funding ranges from approximately \$488 per ADA up to \$935 per ADA. Currently, most SELPAs are in the midrange with the statewide target average of \$540.99.

Declining enrollment for the purposes of AB 602 funding is based upon total SELPA ADA rather than individual district's ADA. Additionally, because of the statewide decline in enrollment and the funds needed to support AB 602, there has been a shortage of funding each year causing a 3% deficit factor to be applied to the AB 602 funding. In some years, the deficit can be made up with the attendance recertifications that occur in subsequent years, but the impact has already been negative for current-year needs.

Programs that were excluded from the AB 602 calculation continue to be funded outside of the formula. Additionally, increases in state funding for COLA and/or growth are only applied to the state funds in the formula.

New federal funds (when there are new federal funds) are passed through in lieu of COLA and growth on the federal side. The result of this complexity is that when all other state programs are receiving funding enhancements for COLA and growth, Special Education is getting less on a per-ADA basis, as it is only applied to a portion of the funding formula. The statewide target is used to determine low-funded SELPAs and the special disabilities adjustment for high-need SELPAs.

Other programs funded through AB 602 are:

- Out-of-Home Care Regionalized Services/Program Specialists
- Low Incidence
- NPS Extraordinary Cost

The CDE website provides the funding exhibits for each SELPA through the Principal Apportionment menus. For 2018-19, some of the base funding for SELPAs will be removed from the AB 602 base and returned to the SELPAs for regional services and program specialists. This funding was initially outside of the formula, and the state recognizes the need to remove it. The statewide target rate will be adjusted based upon the removal of this funding. Allocation formulas may or may not be impacted depending upon the specific formulas adopted at each SELPA.

## Contributions

It is vital for districts and SELPAs to understand the history of their funding in order to develop and monitor their allocation models. The funding formula that AB 602 provides is better than the old system, but is still not providing uniform and consistent rates to all SELPAs. Equity in Special Education funding cannot be achieved, as each SELPA and each participating member of the SELPA will have unique needs, and the state cannot predict those needs. With that said, this is a woefully underfunded program that requires a significant contribution from the General Fund of each LEA.

With the implementation of the Local Control Funding Formula (LCFF), districts are no longer separating out any SDC ADA in the attendance reports to the state. It is imperative that districts know their SDC ADA in order to calculate how much of the contribution is to be made from the ADA that the SDC students generated toward the LCFF.

The funding for Special Education students should be applied to the Programs in the following order:

1. LCFF.
2. Lottery and other ADA-related state funding.
3. Supplemental and concentration grant funding as appropriate and outlined in the Local Control and Accountability Plan (LCAP).
4. AB 602 funds.
5. Any federal Special Education funds.

In understanding Special Education funding, districts should keep in mind that Special Education is not a “stand-alone” program; it is meant to supplement the education offered to the general population of students and to assist SWDs in attaining the educational goals contained in their IEPs. Special Education students generate LCFF dollars first, and those dollars should contribute to their educational program.

Among the responsibilities of each SELPA is ensuring that, within its local area, the following requirements are met for SWDs:

- A free and appropriate public education (FAPE) is provided in the least restrictive environment (LRE)
- All regular education resources are considered and, where appropriate, utilized on a local or regional basis to meet the needs of SWDs
- A system exists at the regional level for identification, assessment, and placement of SWDs
- A viable system for public education is functioning in the community, with broad participation and interaction involving parents and other agencies serving children and young adults
- All program compliance requirements are met and, when necessary, reported to the state

Each region must have a local plan that specifies how the above requirements are met, with an explanation of how the SELPA is organized and managed, and, most importantly, how funding is used in support of the local plan. The state allocates the vast majority of funding for Special Education services based on the number of students in attendance at the member districts of each SELPA. Each SELPA has an allocation formula for distributing the funding received for the Special Education-related needs of the SELPA.

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## Special Education Local Plan Area

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SELPA's are a requirement of the Education Code requiring LEAs to either form a consortium of LEAs, or individually comply with IDEA. The SELPA's serve as an intermediary between the state and the LEA in compliance and reporting.

Size and scope requirements of SELPA's are outlined in E.C. 56140. A single-district SELPA must have kindergarten through grade 12 and 30,000 or more pupils. The District does not qualify to be a single-district SELPA based on statute.

The District is a member of the SELPA III of Santa Clara County. The operator, or Administrative Unit (AU), of the SELPA is the Santa Clara County Office of Education (SCCOE). It is important to note that the SCCOE belongs to six SELPA's and serves as the AU for five of them. The SELPA III represents 38,431 ADA in Santa Clara County and is the highest funded SELPA in the county. In 2017-18, the SELPA was funded at \$676.65 per ADA; the average in the state was \$540.99. SELPA III is the only Santa Clara County SELPA funded above the statewide average.

The SELPA passes through funds to the districts for the local Special Education programs from the following sources:

- State apportionment (AB 602) less the AU costs per district
- Property tax attributed to Special Education in the district
- Federal Local Assistance Grants
- Federal Preschool Grants
- Infant and Toddler Funding Grants
- Inservice/Staff Development Grants

Low-incidence funds are distributed based upon need and in accordance with the SELPA policy. The SELPA has a "housing plan" which allows LEAs to recapture costs of housing SELPA (regionalized) programs on LEA campuses. Despite this agreement, the District believes that it is "supporting" several students in a program at one of its campuses because the students (from other Districts) are also mainstreamed into some of its general education classes; the District reports that it is educating 37 students in this program and only 6 are in-district students. An analysis done by the District on students included at grade level coming from other LEAs indicates that the District could be subsidizing the education of students who are not attributed to the District ADA. Based on the District's analysis, a reimbursement for the teacher salary is far less than an 80% of ADA (5/6 class periods) estimate based upon the contributing District per-student revenue. Figure 8



estimates the potential revenue loss when providing service to out-of-district students. The District provided the data based upon SELPA estimates. Figure 8 does not include any students who are fully included in an LCFF district and whose ADA is attributed to that District.

**Figure 8: District Support of Out of District Students—Options**

Program	Reimbursement for Teacher Salary	ADA	80% of ADA (5/6 Periods)
Deaf/Hard of Hearing	\$111,217	\$186,018	\$149,971
Orthopedic Impairments	\$68,250	\$106,352	\$85,082
Emotional Disturbances	\$3,609	\$5,012	\$4,008
<b>Total</b>	<b>\$183,076</b>	<b>\$297,382</b>	<b>\$239,061</b>

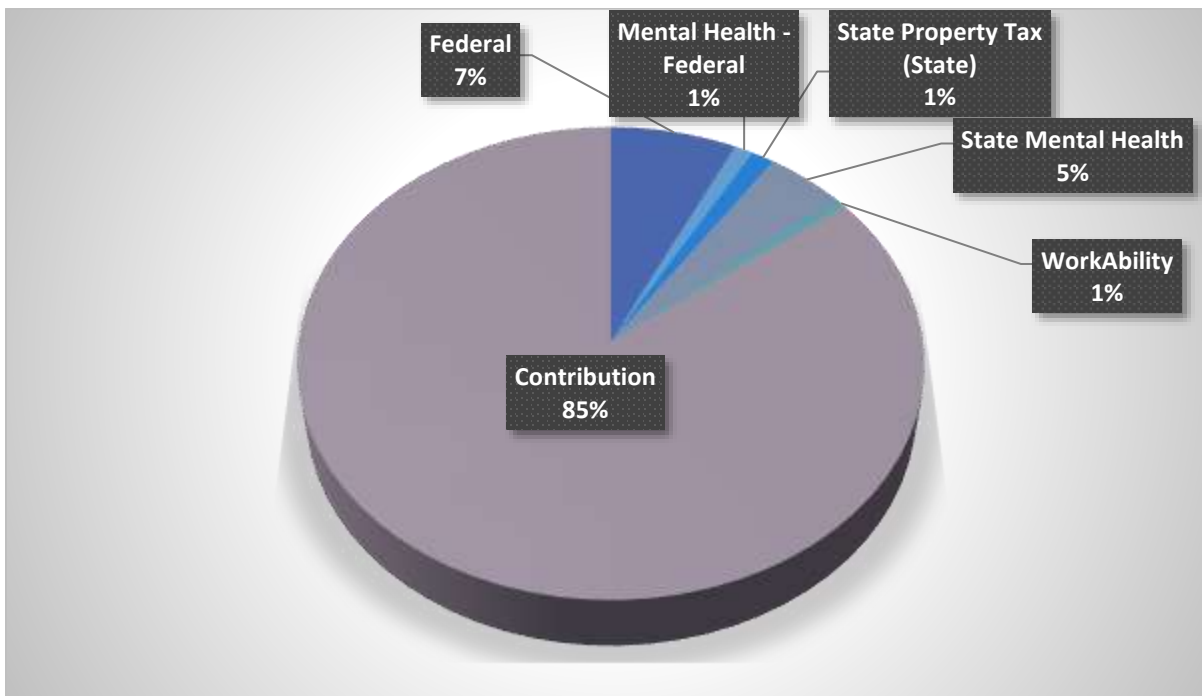
Source: District-provided data

The fairly new Assistant Superintendent, Business Services, and the even newer Fiscal Services Director have not been involved in any SELPA finance subcommittees yet. The finance subcommittees are the best opportunity to understand the financing and allocation plan attributed to member districts. The SELPA provided an estimated “block” rate for specific classes for member districts operated by the SELPA. The estimate shows that most costs for SELPA services will increase in the upcoming school year.

## District Special Education Revenues

Revenues are based upon the District’s overall ADA multiplied by the SELPA base rate, minus any deficit or SELPA costs. The 2016-17 District audited financial records include the following revenues and expenditures for Special Education Programs. The District budgets for expenditures in the General Fund for administration of the Programs using a Special Education goal in order to continue to track Program expenses. The data reported in the following charts and tables is based upon actual revenues received and reported in the California Standardized Account Code Structure (SACs) format by the District.

**Figure 9: 2016-17 Special Education Revenues by Type**

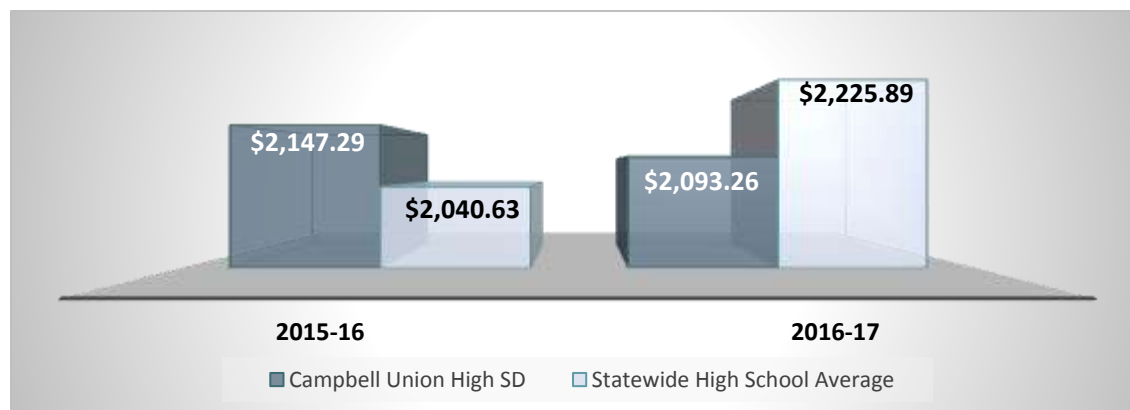


Source: District-provided data

## Program Expenditures

The District's overall per-student cost of operating programs for SWDs is above the statewide average in 2015-16 and below in 2016-17 as illustrated in Figure 10. The data reported in the following charts and tables is based upon actual expenditures reported in the SACs format by the District.

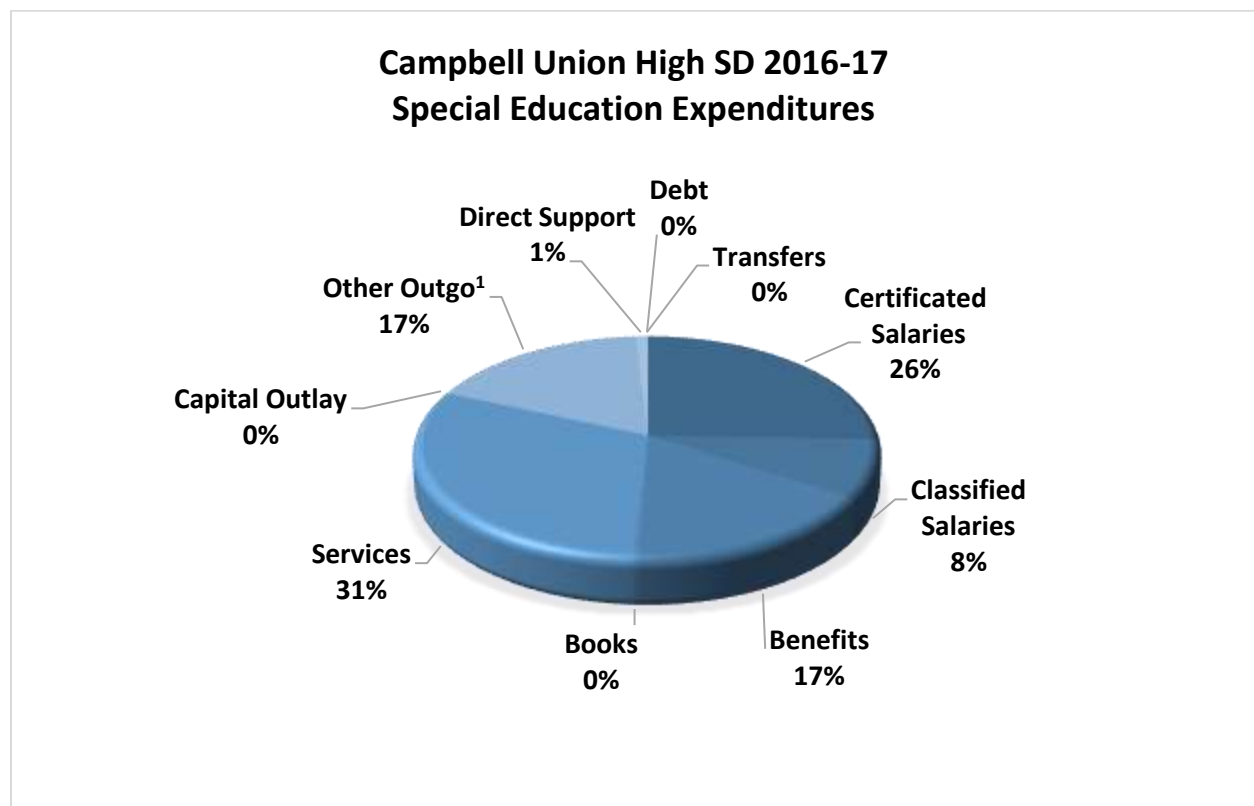
**Figure 10: SWDs Cost Per Pupil—District and Statewide Averages**



Source: California Longitudinal Pupil Achievement Data System (CALPADS) state-certified data

Figure 11 shows the distribution of operational costs for Special Education Programs in the District. Like the rest of an LEA budget, most of the costs associated with operating Special Education Programs are in personnel. Personnel costs represent 78% of Special Education expenditures for high school districts statewide, compared to 51% in the District. The percentage of total expenditures for the “Services” category includes any contracted services such as NPAs or schools, utilities, rents and repairs, or similar services from a private vendor. The District’s overall percentage for this category is 31%, which is high. As a result, the percentage of personnel costs appear low but is not due to understaffing or lower compensation, which will be discussed later in the report. The funding impact of declining enrollment is based upon SELPA-wide enrollment and may negatively impact Special Education funding for the District.

**Figure 11: Special Education Expenditures as a Percentage of Total Expenditures Campbell Union High SD**

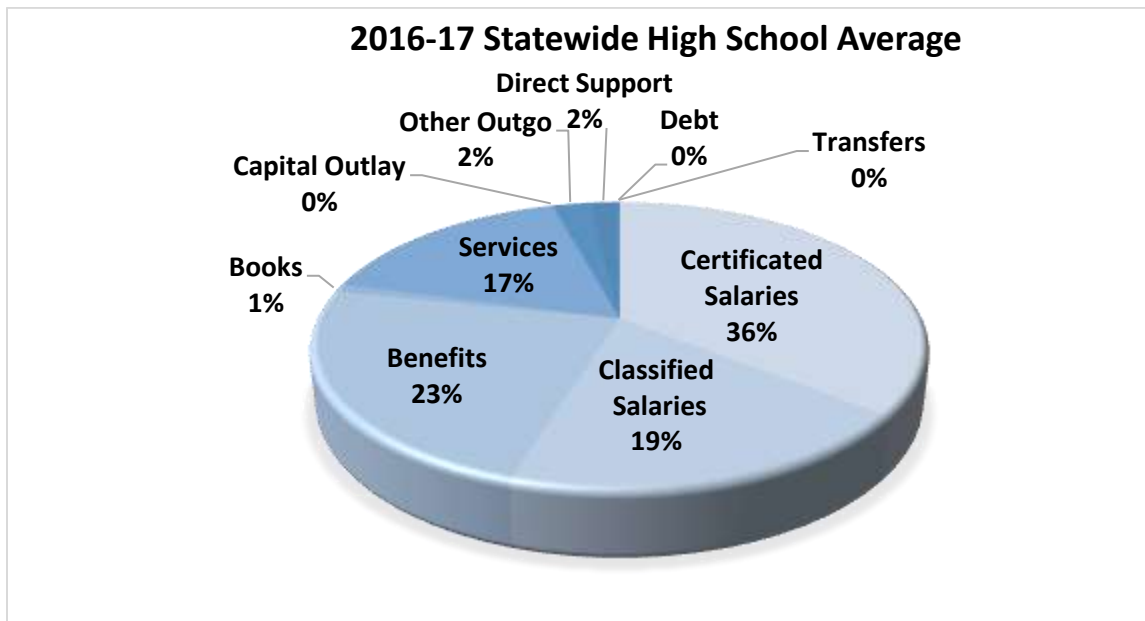


Source: CDE Standardized Account Code Structure (SACS) reports for 2016-17

<sup>1</sup>Other outgo includes excess cost and tuition payments to other entities and debt service expenditures, including contributions to county office programs

Figure 12 illustrates the statewide high school district average Special Education expenditures as a percentage of total expenditures.

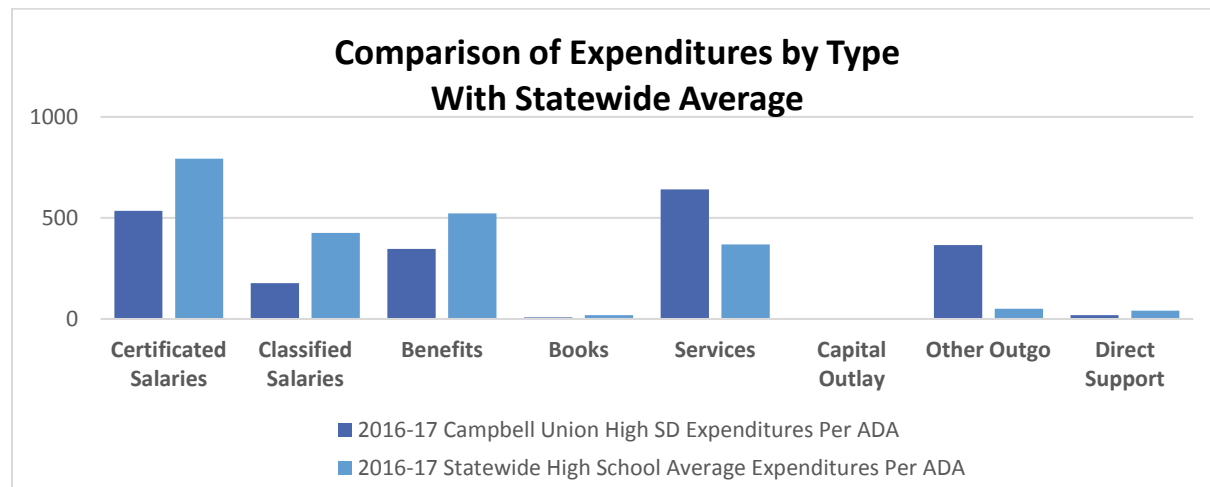
**Figure 12: Special Education Expenditures as a Percentage of Total Expenditures, Statewide High School District Average**



Source: CDE SACS reports for 2016-17

Figure 13 illustrates the District expenditures per ADA by type compared to the statewide high school district average. As the chart highlights, the statewide average is much higher, on a per-student basis, than the District for salary and benefits, while the District is much higher in both Other Outgo and Services. This indicates that the District is paying more for contracted and regional services and less in salaries for specialized services. In the current environment with shortages of qualified personnel for teachers and specialists, this is becoming more common.

Figure 13: Comparison of Expenditures by Type



Source: 2016-17 state-certified data from CDE

Figure 14 shows the cost comparison for 2015-16 and 2016-17 by type of expense. The data reported in the following charts and tables is based upon actual expenditures reported in the SACs format by the districts represented in the comparison.

This chart shows that the expenses were relatively stable, but vary significantly from the statewide average.

Figure 14: Comparison of Expenditures by Type 2015-16 and 2016-17

Special Education Program Expenditures by Type	2015-16 Campbell Union High SD Expenditures Per ADA	2015-16 Statewide High School Average	2016-17 Campbell Union High SD Expenditures Per ADA	2016-17 Statewide High School Average
Certificated Salaries	\$625.14	\$740.13	\$534.83	\$793.84
Classified Salaries	\$174.08	\$391.48	\$177.67	\$426.55
Benefits	\$349.94	\$456.72	\$346.95	\$522.09
Books	\$53.84	\$20.42	\$7.04	\$19.14
Services	\$571.93	\$339.37	\$641.83	\$368.63
Other Outgo	\$370.22	\$46.74	\$365.8	\$50.38
Direct Support	\$2.14	\$41.86	\$19.14	\$40.84

Source: 2016-17 state-certified data from CDE

Figure 15 shows District and comparative group expenses and contributions on a per-ADA basis. In this comparison, the District has the third highest contribution as a percent of total expenditures and the highest as a percent of total Special Education expenses.

**Figure 15: Contribution as a Percent of Total Expense**

LEA	Expense Per ADA	Contribution Per ADA	Contribution as a % of Special Education Expense	Contribution as a % of Total Expense
<i>Campbell Union High SD</i>	<i>\$2,147.29</i>	<i>\$1,827.22</i>	<i>85.1%</i>	<i>14.7%</i>
Acalanes Union High SD	\$1,745.63	\$1,064.53	61.0%	8.2%
Alameda City Unified SD	\$2,706.01	\$1,806.50	66.8%	15.3%
Castro Valley Unified SD	\$1,854.65	\$899.64	48.5%	8.9%
Fremont Union High SD	\$2,655.18	\$2,061.68	77.6%	16.2%
Liberty Union High SD	\$1,765.49	\$985.74	55.8%	9.4%
Los Gatos-Saratoga Union High SD	\$2,410.50	\$1,581.92	65.6%	9.9%
Morgan Hill Unified SD	\$2,123.94	\$1,298.47	61.1%	12.9%
Mountain View-Los Altos Union High SD	\$2,930.08	\$2,227.44	76.0%	11.3%
San Jose Unified SD	\$2,117.27	\$1,587.74	75.0%	13.3%
San Mateo Union High SD	\$2,781.52	\$2,031.10	73.0%	11.5%
Sequoia Union High SD	\$2,790.68	\$1,978.41	70.9%	11.6%
South San Francisco Unified SD	\$2,182.33	\$1,481.06	67.9%	13.6%
Tamalpais Union High SD	\$2,656.96	\$1,873.44	70.5%	10.2%

Source: 2016-17 state-certified data from CDE

Figure 16 shows the total revenue and total expenses for each of the comparison districts. The District has the lowest revenue and the highest contribution as a percent of total expense of all the districts in the comparison group. The statewide average contribution is approximately 65% for 2016-17 and the District exceeds that by an additional 20.33% at 85.33% of expenses.

**Figure 16: Revenue Comparison**

LEA	Total Revenue	Total Expense	Contribution	Contribution as a % of Total Expense
<i>Campbell Union High SD</i>	<i>\$2,266,583</i>	<i>\$15,452,500</i>	<i>\$13,185,917</i>	<i>85.33%</i>
Los Gatos-Saratoga Union High SD	\$2,760,496	\$8,243,440	\$5,482,944	66.51%
Mountain View-Los Altos Union High SD	\$2,885,454	\$12,695,607	\$9,810,153	77.27%
Tamalpais Union High SD	\$3,431,907	\$12,444,690	\$9,012,783	72.42%
Acalanes Union High SD	\$3,721,057	\$8,981,869	\$5,260,812	58.57%
Liberty Union High SD	\$6,029,154	\$13,032,728	\$7,003,575	53.74%
Fremont Union High SD	\$6,102,260	\$29,371,037	\$23,268,777	79.22%
Sequoia Union High SD	\$6,434,070	\$25,411,793	\$18,977,723	74.68%
Morgan Hill Unified SD	\$6,722,301	\$17,578,741	\$10,856,439	61.76%
San Mateo Union High SD	\$6,939,097	\$21,236,050	\$14,296,954	67.32%
South San Francisco Unified SD	\$7,213,604	\$17,291,088	\$10,077,484	58.28%
Alameda City Unified SD	\$8,210,154	\$26,179,497	\$17,969,343	68.64%
Castro Valley Unified SD	\$8,597,773	\$17,543,785	\$8,946,012	50.99%
San Jose Unified SD	\$14,359,614	\$65,275,922	\$50,916,307	78.00%

Source: 2016-17 state-certified data from CDE

## Transportation

The LCFF absorbed many funding sources from state categorical programs and rolled the funding into each district's base funding—home-to-school transportation was one of the programs. Although districts are required to maintain the same level of expenditures maintenance of effort (MOE) for home-to-school transportation as they did in 2012-13 (up to the state funding amount), the MOE doesn't specify the requirement to be for transportation for the general population of

students or specialized transportation. For those reasons, we chose to review transportation separately from other revenue and expenditures. The District only transports SWDs.

As stated, there is no longer a distinguishable revenue source solely for transportation, as it is considered an add-on to the LCFF. Transportation services for SWDs are addressed in Board Policy 3541. The policy states that the Board will ensure that transportation services are provided, based upon the student's IEP, at no cost to the parents. Interviews we conducted with Special Education staff indicated that there aren't decision-making guidelines for when transportation should be provided. There are many good documents used in other districts for the purpose of making these key decisions. We have provided a sample in Appendix B. The SELPA handbook provides the guidance issued by the CDE in 2012 regarding specialized transportation. The most recent guidance by the CDE is dated 2017. Although the content doesn't vary a great deal, the SELPA handbook and District training should be based upon the most recent version.

As shown in Figure 17, specialized transportation is available and utilized by SWDs, and more than one-third of students are transported curb to curb, which requires specialized routes and multiple stops, increasing the cost of transportation. Students are transported using buses and vans in nine total routes (two vans and seven buses). Two van routes and one bus route are 100% curb to curb. In some instances, the use of curb-to-curb service may impair a student's ability to gain independence. These services should be reviewed annually.

**Figure 17: SWDs Receiving Transportation**

Curb to Curb	Bus Stops/Other	Total
36	67	103

Figure 17 illustrates the number of SWDs receiving transportation services. The overall percentage of students being transported is approximately 14% of the total number of SWDs. Transportation costs for the 2015-16 fiscal year were in excess of \$1.3 million. Most of the costs incurred were paid to a transportation provider contracted by the District. Additionally, the District reported that it provides transportation vouchers for public transportation in the annual amount of approximately \$130,000 for eligible students, many of which are SWDs. The District had not separately tracked the transportation costs within a Special Education goal code. It appears that an audit adjustment corrected that practice and a budget adjustment was made on the Program Cost Report Allocations form (Form PCRA) within the SACS program to allocate the Special Education transportation program costs. We recommend that the transportation costs are reflected within the Special Education program costs and defined with the proper goal code. The goal code used to identify the transportation costs as Special Education was an unspecified Special Education code (Goal 5001). Whenever an unspecified goal code is used, the Form PCRA must reflect an allocation of costs by program.



The lack of funding for Special Education is impeding recruiting efforts as LEAs are dipping further into operational funds to maintain programs. This is further impacted by the nationwide shortage of qualified staff. The state has developed some budget relief to help LEAs recruit and retain qualified teachers, but it is only temporary relief. One area of comparison that is important to review is the salaries and benefits (total compensation) offered to ensure the District is competitive in attracting teachers. Figure 18 compares the District's total compensation for an entry-level teaching position to the comparative districts. In this comparison, the total compensation offered at the beginning salary is in the top three, and the health and welfare benefits offered are the highest in the group. The data reported in the following charts and tables is based upon actual J-90 reports by the represented districts.

**Figure 18: Entry-Level Teacher Salary and Benefit Comparison**

Total Compensation: Salary Paid for BA+30, Step 1, Plus Average District Contribution for Health and Welfare Benefits, 2016-17			
LEA	Total Compensation	Salary Paid for BA+30, Step 1	Average Health and Welfare Benefit Contribution
Los Gatos-Saratoga Union High SD	\$83,737.30	\$62,976.00	\$20,761.30
Fremont Union High SD	\$80,530.19	\$62,514.00	\$18,016.19
<b>Campbell Union High SD</b>	<b>\$76,634.00</b>	<b>\$55,444.00</b>	<b>\$21,190.00</b>
<b>Comparative Group Average</b>	<b>\$68,710.18</b>	<b>\$56,181.18</b>	<b>\$12,529.00</b>
South San Francisco Unified SD	\$64,982.80	\$55,363.00	\$9,619.80
Liberty Union High SD	\$63,996.73	\$49,797.00	\$14,199.73
Morgan Hill Unified SD	\$63,809.84	\$53,387.00	\$10,422.84
Castro Valley Unified SD	\$60,602.00	\$54,602.00	\$6,000.00

Source: 2016-17 state-certified J-90 report

Figure 19 compares the District's total compensation at the salary offered at BA+60, Step 10. At the midrange, the District remains in the top three with the highest benefit contribution.

**Figure 19: Entry-Level Teacher Salary and Benefit Comparison**

Total Compensation: Salary Paid for BA+60, Step 1, Plus Average District Contribution for Health and Welfare Benefits, 2016-17			
LEA	Total Compensation	Salary Paid for BA+60, Step 1	Average Health and Welfare Benefit Contribution
Los Gatos-Saratoga Union High SD	\$120,511.00	\$99,750.00	\$20,761.00
Fremont Union High SD	\$115,421.00	\$97,405.00	\$18,016.00
<i>Campbell Union High SD</i>	<i>\$103,898.00</i>	<i>\$82,708.00</i>	<i>\$21,190.00</i>
<b>Comparative Group Average</b>	<b>\$96,102.00</b>	<b>\$83,573.00</b>	<b>\$12,529.00</b>
Liberty Union High SD	\$90,228.00	\$76,028.00	\$14,200.00
Morgan Hill Unified SD	\$89,450.00	\$79,027.00	\$10,423.00
South San Francisco Unified SD	\$86,564.00	\$76,944.00	\$9,620.00
Castro Valley Unified SD	\$83,920.00	\$77,920.00	\$6,000.00

Source: 2016-17 state-certified J-90 report

Figure 20 compares the District's total compensation at the maximum salary offered. There is no change to the overall ranking by the maximum scheduled salary. This high placement in the ranking would indicate that the District offers competitive salaries and benefits for its teachers.

**Figure 20: Entry-Level Teacher Salary and Benefit Comparison**

Total Compensation: Maximum Scheduled Salary, Plus Average District Contribution for Health and Welfare Benefits, 2016-17			
LEA	Total Compensation	Maximum Scheduled Salary	Average Health and Welfare Benefit Contribution
Los Gatos-Saratoga Union High SD	\$149,918.00	\$129,157.00	\$20,761.00
Fremont Union High SD	\$134,511.00	\$116,495.00	\$18,016.00
<b><i>Campbell Union High SD</i></b>	<b><i>\$125,628.00</i></b>	<b><i>\$104,438.00</i></b>	<b><i>\$21,190.00</i></b>
<b><i>Comparative Group Average</i></b>	<b><i>\$117,214.00</i></b>	<b><i>\$104,685.00</i></b>	<b><i>\$12,529.00</i></b>
Morgan Hill Unified SD	\$110,417.00	\$ 99,994.00	\$10,423.00
Liberty Union High SD	\$110,148.00	\$95,948.00	\$14,200.00
South San Francisco Unified SD	\$107,108.00	\$97,488.00	\$9,620.00
Castro Valley Unified SD	\$105,896.00	\$99,896.00	\$6,000.00

Source: 2016-17 state-certified J-90 report

Movement of teachers across the salary schedule during their careers can be estimated based upon typical progression, which results in a certain amount of cumulative career earnings. In the next two tables, we review a typical earnings calculation (does not include health and welfare benefits) based on assumed step-and-column movement over time. The District's ranking moves to the midrange in both ten- and twenty-year comparisons. Figure 21 illustrates the ten-year earnings for teachers in the comparative group.

Figure 21: Ten-Year Earnings Calculation	
LEA	Ten-Year Total Earnings
Los Gatos-Saratoga Union High SD	\$1,937,646.00
Fremont Union High SD	\$1,884,229.00
Liberty Union High SD	\$1,617,894.00
<b><i>Campbell Union High SD</i></b>	<b><i>\$1,585,136.00</i></b>
Morgan Hill Unified SD	\$1,539,806.00
Castro Valley Unified SD	\$1,535,348.00
South San Francisco Unified SD	\$1,506,691.00

Source: State-certified reports: J-90, California Basic Educational Data System (CBEDS), and SACS

Figure 22 illustrates the twenty-year earnings for teachers in the comparative group.

Figure 22: Twenty-Year Earnings Calculation	
LEA	Twenty-Year Total Earnings
Los Gatos-Saratoga Union High SD	\$2,531,317.00
Fremont Union High SD	\$2,458,847.00
Liberty Union High SD	\$2,101,384.00
<b><i>Campbell Union High SD</i></b>	<b><i>\$2,073,034.00</i></b>
Morgan Hill USD	\$2,013,253.00
Castro Valley Unified SD	\$2,002,655.00
South San Francisco Unified SD	\$1,986,354.00

Source: State-certified reports: J-90, CBEDS, and SACS

## Budget Planning and Maintenance of Effort

The District follows a budget planning process that includes a cadre of experienced and well-trained staff. This combination has allowed the District to adapt over the years to the growing fiscal needs, even as Special Education enrollment and costs increased. The District's Budget Office is attuned to its Special Education budget and costs.

As the District considers changes to service delivery plans and/or staffing, it is imperative to review and update the MOE calculation. LEAs can incur a penalty if they fail to meet the federal Special Education MOE standards. The CDE monitors compliance with the federal regulation that federal funds be used to supplement, not supplant, state and local funds for Special Education. The general rule is that LEAs must spend the same level of state and local funding on Special Education as in the prior year, either in total or per capita (Title 34 of the Code of Federal Regulations [CFR] 300.231-300.233).

## Recommendations—Revenues, Expenditures, and Transportation

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4. **Become involved in SELPA finance.** The Fiscal Director and/or Assistant Superintendent, Business Services should regularly attend SELPA meetings as well as SELPA Finance Committee meetings to keep abreast of funding challenges and changes as they occur and to keep the Administration informed of the impact of changes on the District's overall budget.
5. **Develop agreements to receive funding or services for inclusion of out-of-district students.** The District is not receiving any current funding when including out-of-district students in the general education population. The needs of the student are paramount to providing a full continuum of services, which includes being educated alongside their grade-level peers. It is recommended that the District work with the districts as they send students to help defray the additional cost incurred.
6. **Review IEP procedures for adding transportation.** Utilize a decision tree or specific process when adding transportation to the IEP. This will help to ensure that students are being provided the opportunity for increased independence and mobility by fading transportation services as independence increases.

## Special Education Programs

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In order to fully understand the requirements and related costs for a current Special Education program, it is important to include a brief history of Special Education as we discuss programs currently operated by the District.

## History of Special Education Programs

Between the mid-1960s and 1975, state legislatures, the federal courts, and the United States Congress spelled out strong educational rights for children with disabilities. Forty-five state legislatures passed laws mandating, encouraging, and/or funding Special Education programs. Federal courts, interpreting the equal protection and due process guarantees of the 14<sup>th</sup> Amendment to the U.S. Constitution, ruled that schools could not discriminate on the basis of disability and that parents had due process rights related to their children's schooling. PL 94-142, the Education for All Handicapped Children Act (EHA) was enacted by the United States Congress in 1975 and laid out detailed procedural protections regarding eligibility for Special Educational services, parental rights, and IEPs.

The EHA contained two key legal concepts based upon the Equal Protection Clause of the 14th Amendment: FAPE and LRE. FAPE ensures that LEAs provide a free education that is appropriate based on the individual needs of the child and that it is provided in a public school. LRE ensures that the least restrictive placement is always sought. The first option, or default option, to be considered was meant to be placement in the child's neighborhood school in a general education classroom with typically developing peers.

Despite the requirement that SWDs be educated to the maximum extent possible in general education, by the early 1980s a majority of students with the most significant disabilities across the country were still placed in segregated schools and classrooms. As a result, a nationwide full-inclusion movement began in the mid to late 1980s, and in 1990 the EHA was revised and renamed IDEA.

In full inclusion, all students—regardless of disability, health needs, academic ability, service needs, and, often, preference of parent or student—are educated full time in a general education class in their neighborhood school. In this model, the child receives Special Education support services in the general education classroom. In the late 1980s to early 1990s, some LEAs eliminated most, if not all, specialized settings for SWDs. In LEAs where the reform pendulum swung dramatically in the direction of full inclusion, by the late 1990s the need for a continuum of alternative placements was evident.

Since the passage of PL 94-142 in 1975, the law has mandated a continuum of placement options including: (1) full time in a general education classroom; (2) part time in a Special Education resource room; (3) full time in a Special Education self-contained classroom; (4) in a separate Special Education school; (5) at a residential facility; and (6) homebound or in a hospital. Proponents of this continuum agree that full-time placement in general education is appropriate for some students, but not for every SWD. Proponents argue that, in accordance with IDEA, each student should be assessed and placed individually. Additionally, they assert that many SWDs commonly need a more structured and clearly defined environment, either academically or

behaviorally, than a general education classroom can provide. The debate about where an SWD is best served, whether in general education or an alternative placement, continues to be one of the most volatile issues in Special Education.

The first decade of the 21<sup>st</sup> century witnessed a continued national commitment to FAPE intertwined with a renewed national concern for accountability, assessments that would help improve results for each child with a disability, and early intervention. IDEA was amended in 2004 to allow states to employ a response to intervention (RTI) framework and consider a student's response to scientific, research-based interventions prior to being referred to Special Education. Today, IDEA requires that research-based interventions be used and the results documented prior to determining eligibility for Special Education.

LEAs today are expected to provide a full continuum of placement options, including inclusive options such as learning centers, co-teaching, and Specialized Academic Instruction (SAI) models. Additionally, they are required to provide multitiered systems of support (MTSS) to ensure that, to the maximum extent possible, all students, including SWDs, are served in the general education classroom. A series of Performance Review Indicators are used to measure compliance with federal Special Education accountability and student outcome requirements, including requirements related to LRE. Specifically, LEAs must demonstrate the following:

- Greater than 49.2% of SWDs will spend 80% or more of the day in general education
- Not less than 24.6% of SWDs will spend less than 40% of the day in general education
- Less than 4.4% of SWDs will be served in public or private separate schools, residential placements, or homebound or hospital placements

While we do not have any data or information regarding the evolution of District programs since the passage of PL 94-142, the District's performance relative to the above LRE requirements, the continuum of program options offered to SWDs, the availability of MTSS, and the inclusive culture within the District are the basis for how successful the District is in both student achievement and compliance.

## Special Education Cost Drivers

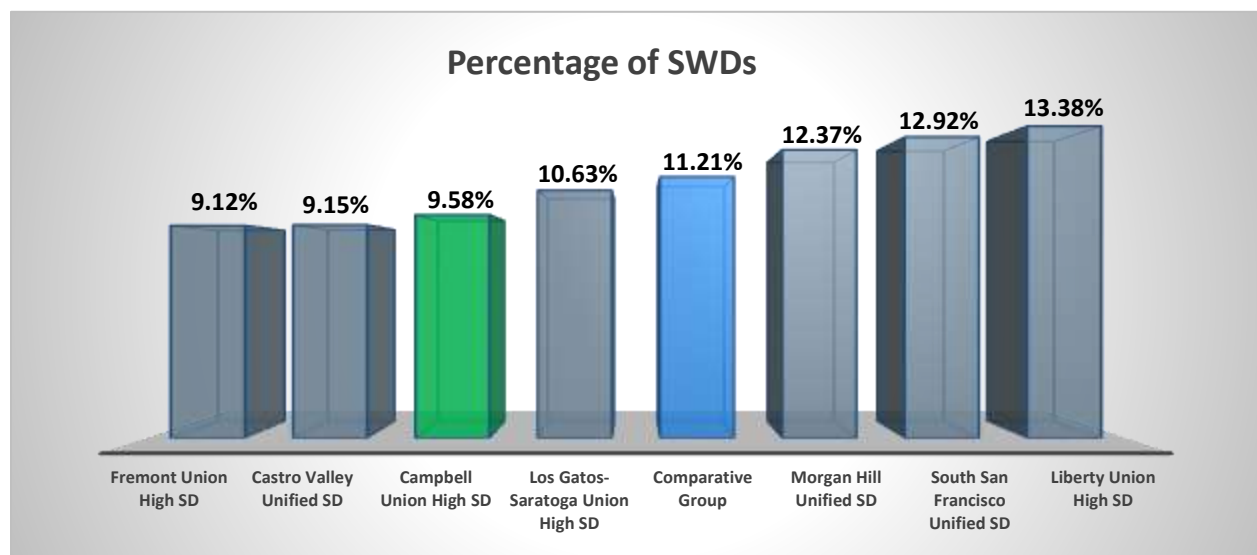
Reviewing revenue and expenditure data and making comparisons to a regional group and/or to statewide data can illuminate problem areas. But data is only part of the story. As indicated in the previous section of this report and like most LEAs, the costs associated with operating a Special Education program are in personnel—which is not the case for the District. Personnel costs (salaries and benefits) represent 51% of Special Education expenditures. Still, to ensure that the District is allocating resources effectively and that it continues to provide high-quality defensible programs, a review of program management and staffing is provided here.

Staffing costs are largely driven by the number and types of students served by the District. When a district is serving more students as a percentage of total enrollment than the statewide high school district average or its neighboring districts, it can expect to have higher-than-average personnel costs. For this reason, in this section we will examine the number of students served as a percentage of total enrollment, as well as examine the percentage of students served by disability type. We will review districtwide interventions and the degree to which they are reducing referrals to Special Education. Additionally, we will provide a comparative analysis of pupil personnel staffing, review how the District is staffing Special Education programs, and take a look at teacher and IA staffing levels.

### Number of Students Served

The state's current Special Education program funding model, AB 602, is largely based on the presumption that incidence and types of disabilities do not vary significantly from district to district. Hence, funding is based on the number of students overall from which each district must determine, as a member of its SELPA, how best to meet the needs of students. Unlike the old Special Education funding model, AB 602 creates a deliberate negative financial incentive for over identifying SWDs if their needs can be met adequately and appropriately in general education with interventions. As a result, it is useful to analyze the number of students, as a percentage of total enrollment, who are receiving Special Education services. The data found in Figure 23 is based on the December 2016 pupil count, the most recent state-certified data available, and compares the number of school-age SWDs being served in the District to the comparative group.

**Figure 23: SWDs as a Percentage of Total Enrollment**



Source: State-certified December 2016 pupil count data

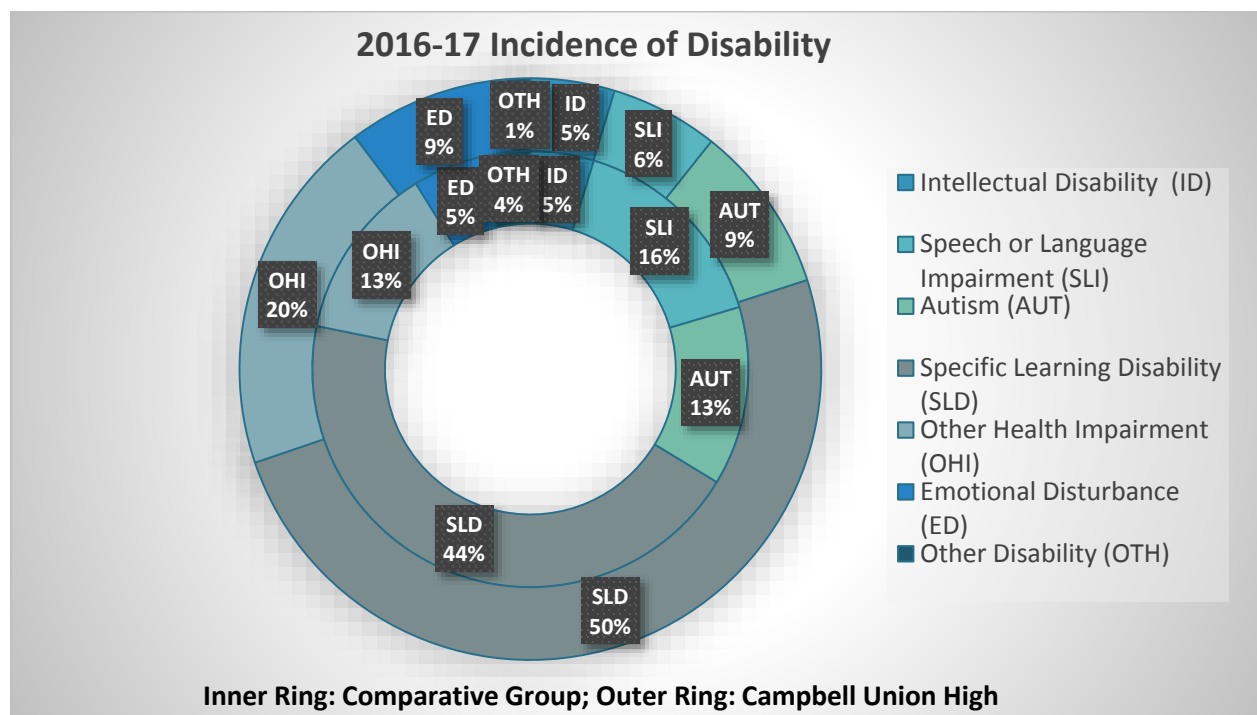


As Figure 23 shows, the average number of students receiving Special Education services among the comparative group is 11.21%. At 9.58%, the District is serving fewer SWDs than the comparative group average. Based on this data alone, one would expect the cost of Special Education programs to be similarly below average, which is not the case in the District.

While looking at enrollment of SWDs, it is also important for program planning purposes to consider the incidents of disabilities by type. Such an analysis can point to areas where the District may need to consider creating or phasing out programs, as well as potential areas of over or under identification. Additionally, it can shed light on the number of students being served with high-cost disabilities.

Figure 24 provides a breakdown of the incidents of disabilities by type and compares the District to the comparative group average. Incidents of disability are calculated by dividing the counts of students reported as having a disability by the total number of students enrolled.

**Figure 24: Comparison of Percentage of Disabilities by Type**



Source: December 2016 California Special Education Management Information System Data

Other: Hard of Hearing, Deaf, Deaf-Blindness, Multiple Disability, Traumatic Brain Injury, Orthopedic Impairment, and Visual Impairment

When comparing the percentage of students served by disability type between the District and the comparative group average, few similarities can be found. In fact, with the exception of students with the primary disability of ID (intellectual disability), the District is either significantly higher or lower than the comparative group average in every disability category. While it is not

uncommon to find a District to be high in one or two disability categories, it is very uncommon for there to be such disparity in nearly all disability categories. These disparities suggest that errors in primary disability codes reported to the state may exist or that the District may not be appropriately assigning primary disabilities when determining eligibility. We cannot determine what, or if, either have occurred based on this data alone. Such a determination would require extensive review of IEPs, which is outside the scope of this review, and should only be considered if the District has anecdotal evidence suggesting that further review is needed.

### **Pre-Referral Interventions**

Having an effective process of early intervention is a proven, cost-effective way to address the academic, behavioral, and/or social-emotional needs of students. Additionally, the IDEA and the Every Student Succeeds Act require that research-based interventions must be used and the results documented prior to determining eligibility for Special Education. Research-based interventions are strategies, teaching methodologies, and supports that have been shown through one or more valid research studies to help a student improve academic, behavioral/emotional, or functional skills. Many research-based interventions provide an MTSS. These systems offer a comprehensive method of differentiated supports that include evidence-based instruction, universal screening, progress monitoring, formative assessments, research-based interventions matched to students' needs, and educational decision making using student outcome data.

If implemented with fidelity, an MTSS will reduce referrals to Special Education. Ideally, efforts to implement an early intervention support structure, or an MTSS, should be led, managed, and monitored as a general education function with Special Education providing support.

While the overall percentage of SWDs in the District is comparatively low, and therefore we have no reason to suspect over identification, the cost of providing services to SWDs is high. Additionally, the percentage of students with SLD is significantly higher than the comparative group. This suggests that pre-referral interventions are either not in place or are not successful in reducing referrals to Special Education.

We found that the District does not have an identified districtwide intervention strategy in place at this time. The intervention strategy was described by many staff we interviewed as a “wait to fail model.” While individual schools are implementing systems of support for students in need of intervention, there is no Districtwide strategy that ensures that every school is implementing District-adopted and financially supported universal screening, progress monitoring, formative assessments, and research-based interventions.

Special Education referral data provided by the District also suggests that pre-referral interventions are either not in place or are not effective. Of the students referred to Special Education, only 20% were referred by an SST while 56% of the referrals are made by parents. Given the high percentage of parent referrals, it is likely that parents are not satisfied with the SST process or feel that

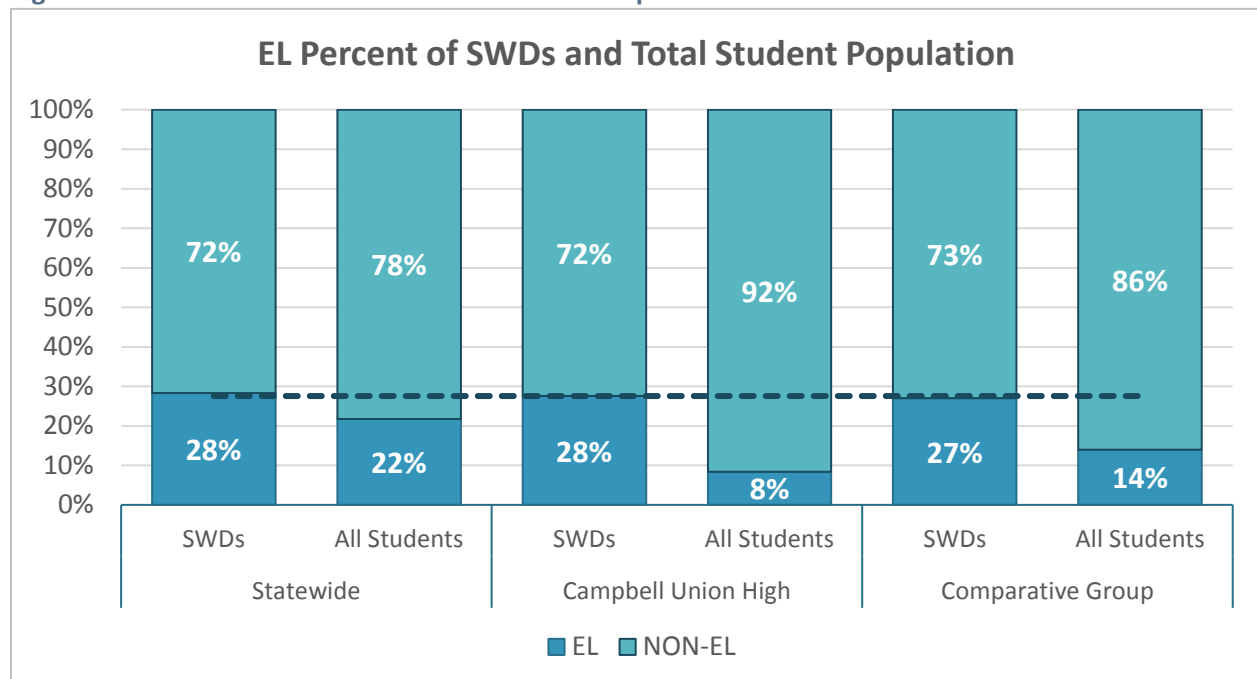
pre-referral interventions provided through the SST process are not meeting their children's needs. What we do not know is the number of students found eligible or ineligible for services by referral type (e.g., SST, parent, other). This data is not collected by the District, but would be helpful in determining the effectiveness of the SST process and any pre-referral interventions provided to students by school site.

### Disproportionality

Disproportionality is a common finding among school districts in two key areas. The first most common finding—in its simplest form—is the number of English learners (ELs) proportionate to the total number of students, and then comparing the same ratio applied to Special Education students. EL proportionality is subject to federal calculations performed by the CDE.

Figure 25 illustrates the number of SWDs who are also identified as EL compared to the statewide average and the comparative group average. At 28%, the number of District SWDs who are ELs is somewhat higher than the statewide average of 22% and slightly higher than the comparative group average of 27%. However, when compared to the 8% of students Districtwide identified as EL, the number of SWDs who are EL is disproportionate.

**Figure 25: EL Percent of SWDs and Total Student Population**

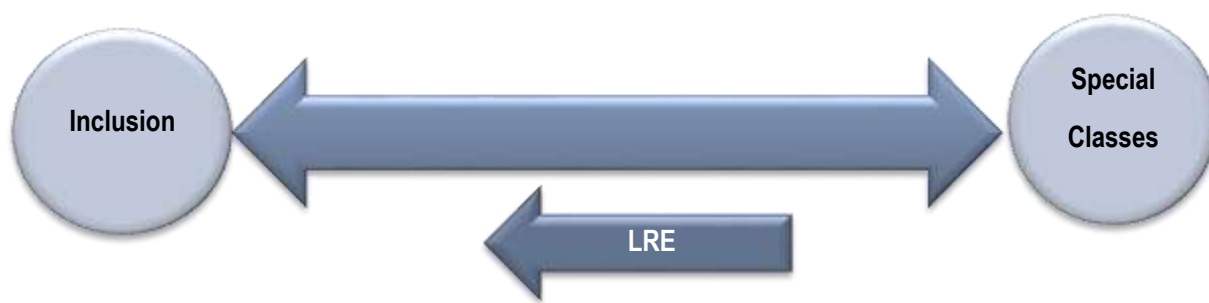


Source: State-certified December 2016 pupil count data

## Continuum of Placement Options

IDEA contains two key legal concepts based upon the Equal Protection Clause of the 14th Amendment, FAPE, and LRE. FAPE ensures that LEAs provide a free education that is appropriate based on the individual needs of the child and that it is provided in a public school. LRE ensures that the least restrictive placement is always sought. The first option, or default option, to be considered is meant to be placement in the child's neighborhood school in a general education classroom with typically developing peers. Figure 26 provides a graphic representation of an IDEA-based continuum of potential service environments to ensure that all students have access to a FAPE in the LRE.

**Figure 26: IDEA-Based Continuum of Potential Service Environments**



	Regular Education Classes	Regular Education Classes	Special Classes Serving SWDs
Basic Description	Academic and social support services available to all students	Additional services provided to students as required by their IEPs	Additional services provided to students as required by their IEPs
Services Provided	<p>Academic instruction based on state standards for the appropriate grade level and/or subject area</p> <p>Academic and social counseling</p> <p>Schoolwide behavior interventions</p> <p>Additional supports and services for the general student population (e.g., tutoring, after school programs)</p>	<p>Academic instruction based on state standards for the appropriate grade level and/or subject area</p> <p>Academic and social counseling</p> <p>Behavior intervention supports, behavior intervention plans</p> <p>Special supports and services individualized for students based on IEP goals and services</p>	<p>Specialized academic instruction based on students' IEP goals</p> <p>Special supports and services individualized for students based on IEP goals and student needs</p> <p>Behavior intervention supports, behavior intervention plans</p> <p>Residential placement as needed</p>

Source: CDE

While there does not appear to be a Districtwide vision for the delivery of Special Education programs and services, and there are no program descriptions, the District provides a continuum of placement options commonly offered by school districts. However, some school sites provide greater opportunities for inclusion in general education settings and more general education and Special Education teacher collaboration. Based on site visits and interviews with school site staff, we believe there is a direct relationship between the approach of the school site principal and the extent to which there is a culture of inclusion at school sites. The District has recently hired site leaders who we would describe as change agents. Several are very knowledgeable and experienced when it comes to the supervision of Special Education programs and staff, are comfortable in this role, and are passionate about building a culture of inclusion where all SWDs are valued members of their school community and have maximum opportunities for access to rigorous instruction in a general education setting. Several school site leaders reported being able to hire high numbers of experienced general education and Special Education teachers with an appetite for collaboration.

We commend the District for its success in hiring strong school site leaders and for supporting their efforts to build more inclusive schools. In addition to continuing to do so, we would

recommend that the District ensure that programs supporting students in special classes provide high-quality options and services for students. More specifically, the District should ensure that students identified as Emotionally Disabled (ED) or Autism (AUT) are appropriately placed. Based on our site visits and interviews with staff, students in these disability categories are sometimes placed in the same SDC. If this is the case, this may not be appropriate for some students based on their instructional needs, the methodology and delivery of instruction, and the methodologies used in managing the social, emotional, and behavioral needs of students with these disability types. The placement of students in these disability categories could be contributing to the unusual number of unilateral placements in 2015-16 and 2016-17. It is important to note that the District does operate some therapeutic special classes for ED students with the most significant needs. Lastly, we found programs for school-aged students with the most significant intellectual impairments lacking in terms of functional academic curriculum and community-based instruction in the areas of vocational training, mobility training, and the skills of daily living.

Complaints filed by parents may either lead to settlement through mediation, by hearing, or ultimately by settlement agreement between parents and the District. The District reports no case filings or hearings in the last three years, but does report at least one mediation each year, and settlements occurred each year. The data shown in Figure 27 indicates that the District may be agreeing to settlements prior to allowing a full mediation and/or hearing, depending on the circumstances of each case.

**Figure 27: Compliance Complaints**

Year	Case Filings	Mediation Only	Mediation	Hearing	Settlements
2017-2018	0	0	8	0	7
2016-2017	0	1	1	0	4
2015-2016	0	0	1	0	4

Source: District-provided data

The District reported that there have been multiple incidences of parents placing non-Special Education students in tuition-based programs and then asking for assessments and subsequent services under an IEP. The costs of these unilateral placements has exceeded \$700,000 in the last two years (\$464,000 in 2017-18 and \$255,050 in 2016-17) and represents ten unilateral placements. Although the overall cost represents less than 2% of total Special Education costs in 2016-17, there is a considerable increase in 2017-18 costs. Based on the data received, it does not appear that the 2017-18 student counts include the 2016-17 students in these placements, meaning the costs are compounding each year.

Figure 28: Unilateral Placements

	2016-17	2017-18
Autism	1	2
Emotional Disturbance	2	2
Other Health Impaired	1	1
Specific Learning Disability	0	1

Source: District-provided data

In our experience, the number of unilateral placements is high and is cause for concern. We do not have sufficient data to determine potential causes and additional study in this area is outside the scope of this review. However, we would recommend the District consider an in-depth review of the circumstances surrounding these unilateral placements and develop a plan to reduce incidences of unilateral placements. In the recommendations that follow, we provide a number of essential questions the District might consider when conducting such a review.

## Recommendations—Special Education Programs

- Develop and implement MTSS.** The percentage of students with the specific learning disabilities is significantly higher than the comparative group average. This suggests that pre-referral interventions are either not in place or are not successful in reducing referrals to Special Education. The District should implement MTSS and ensure they are consistently implemented and that they are supported financially. Keep in mind that pre-referral interventions are the responsibility of general education. The District should consider to what extent this recommendation aligns with the goals of its LCAP in order to leverage supplemental and concentration grant dollars as appropriate.
- Track Special Education referral and pre-referral data.** The District is tracking the number of students being referred for assessment by referral type (e.g., parents, SST, other) and by school site. It would also be wise to track the number of students found eligible or ineligible for Special Education by referral type. Without this accompanying data, it is difficult to determine the impact SSTs and pre-referral interventions are having on referral rates.
- Develop a Districtwide vision for the delivery of Special Education Programs and services.** While the district provides for a continuum of program options commonly found in school districts, some school sites provide much greater opportunities for SWDs to be educated to the maximum extent possible with their non-disabled peers and receive rigorous core instruction. Because this is largely attributed to leadership at the school site, developing



a Districtwide vision, supported by District leadership, will help ensure the District continues to hire teacher and principals with an inclusion approach and a collaborative disposition. A well-written vision statement provides the mental picture of what an organization wants to achieve over time. It provides guidance and inspiration as to what an organization is focused on achieving in the short and long term. A vision statement, if implemented with fidelity, will help the District ensure it is hiring the right people and that decisions support the overall goals of the Special Education Department and the District.

10. **Equip moderate to severe special day classes (MS-SDC) with functional academic curriculum.** We recommend that the District purchase functional academic curricular materials for MS-SDCs to ensure that students are reaching their full potential and that, for this population in particular, they are working towards independence in their daily living and have opportunities for community, mobility, and vocational training.
11. **Review and monitor compliance complaints to ensure processes are followed.** The District should have a process in place whereby a review of complaints is conducted with fidelity and with options considered prior to a settlement agreement being written.
12. **Conduct an in-depth review of unilateral placements.** The number of unilateral placements is high and the cause is unknown. Insufficient data exists and additional study in this area is outside the scope of this review. We recommend the District consider an in-depth review of the circumstances surrounding unilateral placements, identify commonalities or trends, and develop a remediation plan. We have identified a list of essential questions the District might consider when conducting such a review.

### **Essential Questions Related to Unilateral Placements**

- What was the status of the student prior to the unilateral placement?
- Did the student have an SST or Section 504 Plan?
- Was the student provided with supports and/or interventions?
- Was a Special Education assessment requested prior to the unilateral placement?
- If so, who made the request? Did the District provide an assessment plan or what its justification was for denial of the request?
- Was the placement the result of a failure to assess or to assess timely?
- Was the student assessed but found ineligible?
- Was the unilateral placement challenged by the District? Why or why not?



- Did the District offer an in-district or regionalized program?
- How many unilateral placements continued after a hearing, were discontinued, or never went to a hearing?
- Were there compensatory education costs and if so, what is the ongoing cost of each placement?
- How many placements are out of state? How many include residential placement?
- What, if any, involvement was there from the SELPA or other agencies such as county mental health?

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## Special Education Staffing

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### Comparative Analysis of Pupil Personnel and Designated Instructional Support Staffing

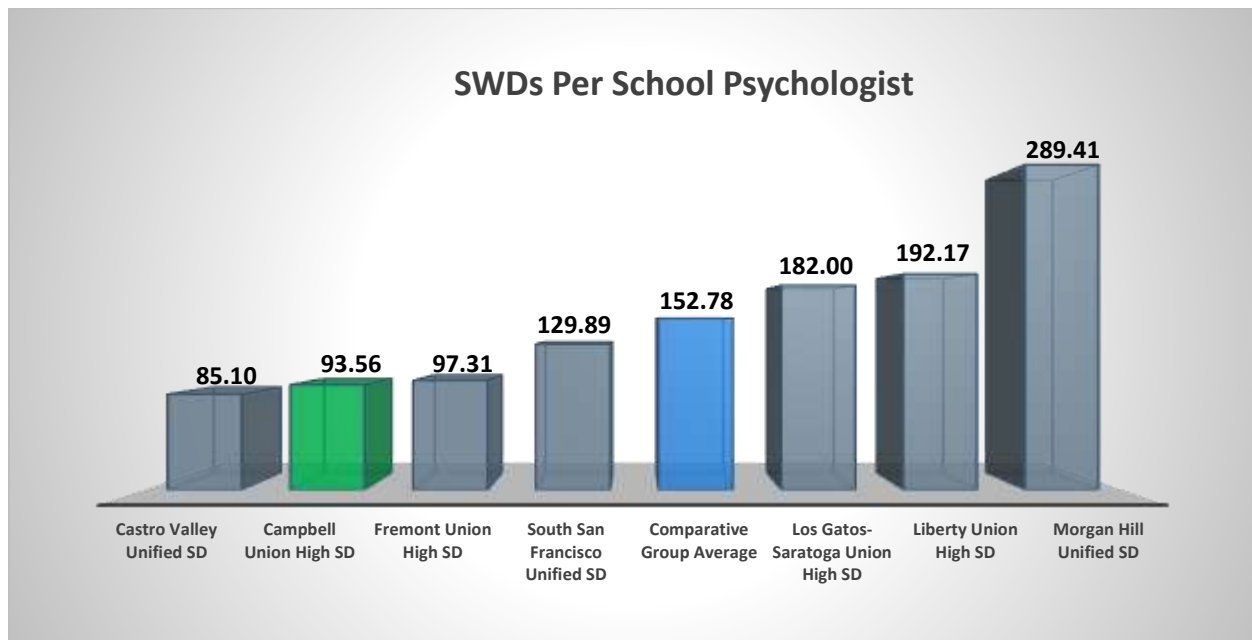
In this section we compare pupil personnel services and related services staffing ratios to those of the comparative group. The staffing data is based on a survey of districts and is based on the most recent completed year, 2017-18. Our comparison of pupil personnel services and DIS staff include: school psychologists, SLPs, program specialists, and behavior specialists. The ratios are based on the number of SWDs served by each district. The data includes any contracted services that were reportedly being provided in these areas. It is important to note that, because the data collection was based on voluntary participation, not all districts provided all of the requested data. The data in this section is based upon District responses to program and staffing surveys included in Appendix A.

#### School Psychologist

Figure 29 compares District staffing ratios for school psychologists to those of the comparative group. At a ratio of 93.56:1, the District's school psychologist staffing ratio is below the comparative group average, indicating that the District employs more school psychologists relative to its student population than all but one of the comparative districts. This higher-than-average staffing level may be somewhat attributed to administrative duties not typically assigned to school psychologists. For example, school psychologist in the district have responsibility for attending and facilitating monthly department meetings on sites, developing and delivering professional development, monitoring caseloads and caseload overages, developing master schedules in collaboration with other site administrators. Additionally, the therapeutic SDC programs provided to students with emotional disabilities require school psychologists who are qualified to also

provide counseling to students. School psychologists are also providing support to the SSTs at many school sites. Unless there was a business reason to assign these additional duties to other staff, we would not recommend a reduction in this ratio.

**Figure 29: SWDs Per School Psychologist**

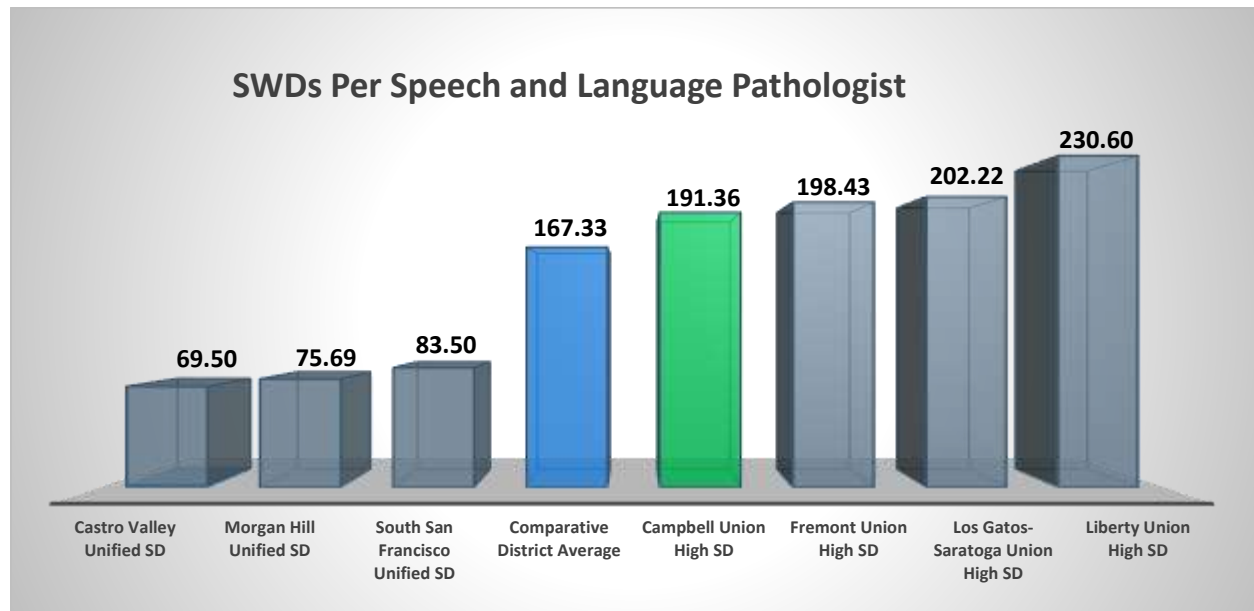


Source: District-provided staffing data for 2017-18 and comparative district survey data

### Speech and Language Pathologist

Figure 30 compares District staffing ratios for SLPs to those of the comparative group. At a ratio of 191.36:1, the District's staffing ratio is above the comparative group average, indicating that it employs fewer SLPs relative to its student population than the average of the comparative group.

**Figure 30: SWDs Per Speech and Language Pathologist**



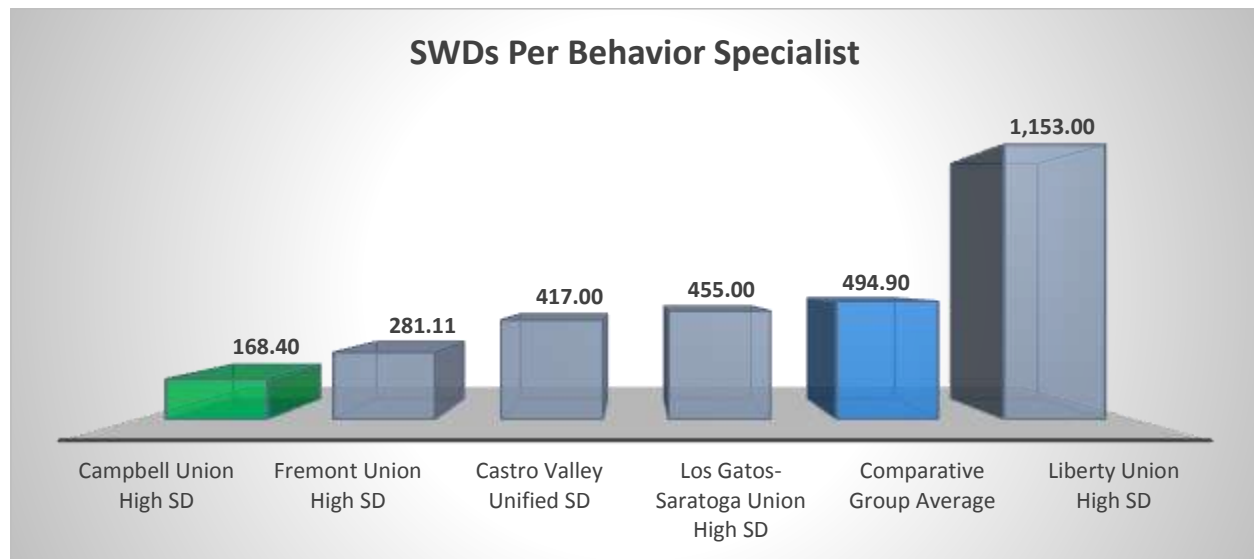
Source: District-provided staffing data for 2017-18 and comparative district survey data

Unlike school psychologists, SLPs have a caseload that is based on the number of students with SLP services. Statewide there is a shortage of qualified SLPs and more LEAs are hiring SLPAs rather than contracting out for SLP services when caseloads reach statutory or contractual maximums. This allows the LEAs to provide speech and language services to all students as required by their IEPs at a lower cost and keeps SLP caseloads below statutory and contractual limits. However, the hiring of SLPAs does not fully mitigate SLP workload demands, as the SLP must provide supervision of the services being provided by the SLPAs, must conduct the annual and triennial assessments, and attend all IEPs as assigned. The District should not only monitor SLP caseloads, in terms of direct services to students, but also track and monitor workload to ensure it is equitably distributed. It is important to note that only two districts—Liberty Union High SD and Morgan Hill Unified SD—in the comparative group employ SLPAs.

## Behavior Specialist

Figure 31 compares District staffing ratios for behavior specialists to those in the comparative group who reported employing behavior specialists. At a ratio of 168.40:1, the District's behavior specialist staffing ratio is the lowest of all districts who reported employing behavior specialists and the comparative average, indicating that it employs more behavior specialists relative to its student population than the comparative group.

Figure 31: SWDs Per Behavior Specialist



Source: District-provided staffing data for 2017-18 and comparative district survey data

Note: Morgan Hill Unified SD and South San Francisco Unified SD do not employ behavior specialists.

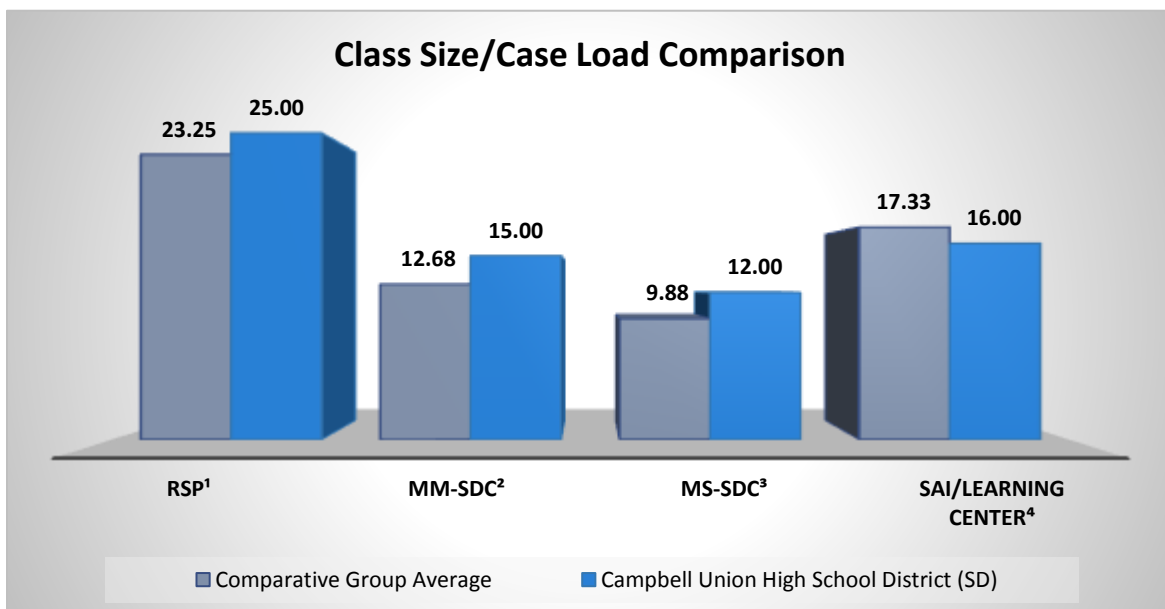
## Program Staffing Levels

In this section we examine teaching and support staff ratios. The information is based on caseload and staffing reports provided by the District and the comparative districts. The Education Code contains a caseload maximum of 28 students per Resource Specialist Program (RSP) teacher. There is no statutory class-size limit for SDCs; however, in comparing SDC class sizes, we include the average of the comparative group.

## Teaching Staff

The District provides a full continuum of program options but does not label programs in a traditional fashion. For comparison purposes, we compare class sizes according to program titles typically found in school districts across the state. The chart below compares class sizes and caseload for students being served primarily in the general education setting (RSP), in a special class (MM-SDC), in a specialized settings for students with more significant disabilities (MS-SDC), or in a collaborative or co-teaching setting (SAI).

**Figure 32: A Comparison of Class Size/Caseload Averages**



Source: District-provided staffing data for 2017-18 and comparative district survey data

<sup>1</sup>Resource Specialist Program (RSP)

<sup>2</sup>Mild to moderate special day class (MM-SDC)

<sup>3</sup>Moderate to severe special day class (MS-SDC)

<sup>4</sup>Specialized Academic Instruction (SAI)

We find RSP caseload to be comparatively average and within statutory caseload limits. MM-SDC and MS-SDC class sizes are higher than the comparative group. SAI/Learning Center class sizes are lower than the comparative group based upon the staffing survey submitted by the District. We are reporting the survey results that were provided as of the 2017-18 school year by the former Director, which may not reflect the inclusive practices of the District.

We found some Special Education staff to be dissatisfied with existing working conditions. We found their complaints to be similar to the complaints made by Special Education teachers statewide. Working with SWDs can be highly rewarding, but the work can also be emotionally and physically draining. Across the state and across the country Special Education teachers are

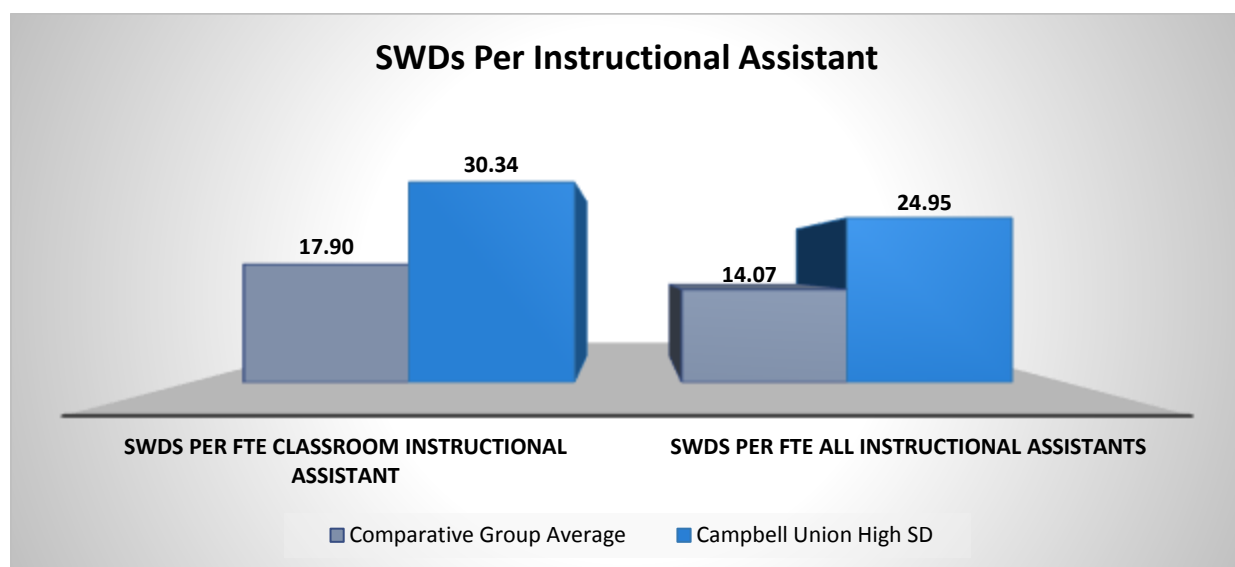
under considerable stress due to heavy workloads and administrative tasks. The demands for student progress are great; they must produce large amounts of paperwork and they often work under the threat of litigation by students' parents. Anecdotally, we know that demands for increased time for preparation, collaboration, testing, and IEP writing are common in the state. An examination or comparison of these working conditions is outside of the scope of this review. It is likely that the District would find that current working conditions are not dissimilar in neighboring districts if it conducted an in-depth analysis.

### Paraprofessionals

Recruiting, selecting, hiring, and retaining trained paraprofessionals is essential to the ability of districts to provide cost-effective, high-quality, and legally compliant programs to SWDs.

When comparing 1:1 paraprofessional staffing on a per-student basis to staffing levels among the comparative districts, we find that there are significantly more students per 1:1 paraprofessional, meaning that it does not employ more 1:1 paraprofessionals relative to its student population. During our interviews with staff, we learned that the 1:1 paraprofessionals are paid an additional 5% for the added responsibilities of toileting, feeding, etc. This leads to additional difficulty for site staff when attempting to meet the needs of the student and requirements of the IEP. This may be a factor in the number of 1:1 paraprofessionals in the District. When we compare SWDs per FTE to classroom paraprofessionals, the ratio in the District is 30.34:1 compared to the comparative group average of 17.90:1, meaning that, overall, the District employs, on average, a smaller number of classroom paraprofessionals relative to its student population as the comparative group.

**Figure 33: SWDs Per Instructional Assistant**



Source: District-provided staffing data for 2017-18 and comparative district survey data

During the Great Recession, paraprofessionals took statutory paid vacation in the form of “time off” rather than in the form of “pay”—this is having a significant impact as LEAs do not have enough paraprofessionals to fill permanent positions and there are no substitutes.

E.C. 45103 defines a short-term employee as an employee whose services are required but will not be extended or needed on a continuing basis. Short-term employees are not part of the classified service if employed and paid for less than 75% of the school year. Although evaluation of short-term paraprofessional staffing levels was outside the scope of this review, we recommend that the District ensure all short-term paraprofessionals are consistent with E.C. 45103.

## Summary and Conclusions

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The District has made meaningful changes within the Special Education Programs to bring more inclusive practices, provide more pre-referral interventions, and provide more training to staff. The Special Education department has continued to see rising costs despite the lower-than-average number of students with disabilities. Many innovative and inclusive options will increase costs initially and level off over the long term.

We recognize that many of the recommendations we make will require time and incur costs. We encourage the District to utilize the implementation plan and timeline included below to determine the priority recommendations and accountability for staff to complete the recommendations.

Implementation Plan					
Recommendations	Priority Rank	Assigned To	Additional Personnel	Additional Resources \$ Amount	Estimated Completion Date
Increase communication during transitions					
Implement clear and concise policies and procedures					
Include the Director in enrollment and staffing meetings at the District level					
Become involved in SELPA finance					
Develop agreements to receive funding or services for inclusion of out-of-district students					
Review IEP procedures for adding transportation					
Develop and implement MTSS					
Track Special Education referral and pre-referral data					
Develop a Districtwide vision for the delivery of Special Education Programs and services					
Equip moderate to severe special day classes (MS-SDC) with functional academic curriculum					
Review and monitor compliance complaints to ensure processes are followed					
Conduct an in-depth review of unilateral placements					



## Appendix A:

### Program and Staffing Surveys Completed by the District

#### Special Education Studies:

#### *Standard District Program Survey (from District)*

**Instructions:** Please list the number or percentage of students served in each applicable category. If your district does not serve an age group or population, please write N/A in the appropriate area.

District Name: Campbell Union High School District

SELPA: SELPA III SELPA Director Name: Annamarie Villalobos

#### Infants and Toddlers Served (Ages Birth - 2)

##### # of Infants and Toddlers Served Under IDEA Part C by Race/Ethnicity

	2017-18	2016-17	2015-16
American Indian/Alaskan Native			
Asian			
Black or African American			
Hispanic/Latino			
Native Hawaiian or Pacific Islander			
White			
Two or more races			

##### Percentage of Infants and Toddlers Served Under IDEA Part C by Setting

	2017-18	2016-17	2015-16
Community-Based			
Home			

Other			
-------	--	--	--

## Exit Status for Infants and Toddlers Served Under IDEA Part C

	2017-18	2016-17	2015-16
Part B Eligible, Exiting Part C			
Part B Eligible, Continuing in Part C			
Not Eligible for Part B, exit with referrals to other programs			
Part B Eligibility Not Determined			
No Longer Eligible for Part C prior to reaching Age 3			
Withdrawal by parent or guardian			
Attempts to contact unsuccessful			
Other exiting categories			

## Dispute Resolution for Infants and Toddlers Served Under IDEA Part C

	2017-18	2016-17	2015-16
Complaints with Reports Issued			
Complaints Withdrawn or Dismissed			
Complaints Pending			
Due Process Complaints that Resulted in Hearings Fully Adjudicated			
Due Process Complaints that were Hearings Pending			
Due Process Complaints Withdrawn or Dismissed			
Mediations held not related to due process complaints			
Mediations held related to due process complaints			
Mediations pending			
Mediations withdrawn or not held			

**Preschool Ages 3-5****# of Children Ages 3-5 Served Under IDEA Part B by Race/Ethnicity**

	2017-18	2016-17	2015-16
American Indian/Alaskan Native			
Asian			
Black or African American			
Hispanic/Latino			
Native Hawaiian or Pacific Islander			
White			
Two or more races			

**# of Children Ages 3-5 Served Under IDEA Part B by Disability Category**

	2017-18	2016-17	2015-16
Speech or Language Impairments			
Intellectual Disabilities			
Autism			
Other Disabilities Combined			

**# of Children Ages 3-5 Served Under IDEA Part B by Educational Environment**

	2017-18	2016-17	2015-16
Regular ECE Program at least 10 hours/week and majority of time in ECE			
Regular ECE Program at least 10 hours/week majority of time elsewhere			
Regular ECE less than 10 hours/week and majority			
Regular early childhood program less than 10 hours/week and majority elsewhere			
Separate Class			
Service provider location or some other location			
Other environments			

**School Age (6-21)**

**# of Children Ages 6-21 Served Under IDEA Part B by Disability Category**

	2017-18	2016-17	2015-16
Specific Learning Disabilities	415	388	380
Speech or Language Impairments	45	46	46
Other Health Impairments	181	164	158
Autism	124	105	103
Intellectual Disabilities	93	85	80
Emotional Disturbance	83	73	64
Other Disabilities Combined	39	51	51

**# of Children Ages 6-21 Served Under IDEA Part B by Race/Ethnicity**

	2017-18	2016-17	2015-16
American Indian/Alaskan Native	38	39	40

Asian	97	83	81
Black or African American	48	52	48
Hispanic/Latino	456	423	416
Native Hawaiian or Pacific Islander	13	15	9
White	493	489	466
<del>Two or more races</del> Declined to state	40	17	8

## # of Children Ages 6-21 Served Under IDEA Part B by Educational Environment

	2017-18	2016-17	2015-16
Inside the regular class 80% or more of the day	513	407	391
Inside the regular class 40% - 79% of the day	243	262	272
Inside the regular class less than 40% of the day	78	56	43
Other Environments:			
NPS/NPA	24	23	28
Moderate to Severe SDC Class	128	164	148
Mild to Moderate SDC Class	117	148	129
Separate Classroom District Operated	NA	NA	NA
Separate Classroom Regional Program	NA	NA	NA

## # of Children Ages 6-21 Served Under IDEA Part B by Educational Environment and Race

2015-16 Educational Environment by Race	American Indian/Alaskan Native	Asian	Black or African American	Hispanic/Latino	Native Hawaiian or Pacific Islander	White	Two or More Races
Inside the regular class 80% or more of the day	17	37	20	153	3	175	

2015-16 Educational Environment by Race	American Indian/ Alaskan Native	Asian	Black or African American	Hispanic/ Latino	Native Hawaiian or Pacific Islander	White	Two or More Races
Inside the regular class 40% - 79% of the day	19	18	19	167	3	170	
Inside the regular class less than 40% of the day	4	31	8	62	2	78	
Other Environments:							
NPS/NPA	1	2	7	7	0	15	
Moderate to Severe SDC Class	3	26	4	33	1	61	
Mild to Moderate SDC Class	36	55	39	320	6	345	
Separate Classroom District Operated	NA	NA	NA	NA	NA	NA	
Separate Classroom Regional Program	NA	NA	NA	NA	NA	NA	

**Percentage of students ages 3-21, served under IDEA Part B; removed from educational placement due to discipline**

	2017-18	2016-17	2015-16
Removed to interim alternative educational setting	0	0	0
Removed unilaterally by school personnel for drugs, weapons, or serious bodily injury	0	0	0
Removed by hearing office for likely injury	0	0	0
Suspended or expelled > 10 days during school year			
Received out of school suspensions or expulsions	0	0	2
Received in school suspensions	0	0	0

**Percentage of students ages 3-21, served under IDEA Part B; removed from educational placement due to discipline by Disability**

2015-16	Removed unilaterally by school personnel for drugs, weapons, or serious bodily injury	Removed by hearing office for likely injury	Received out of school suspensions or expulsions	Received in school suspensions
Specific Learning Disabilities	0	0	1	0
Speech or Language Impairments	0	0	0	0
Other Health Impairments	0	0	1	0
Autism	0	0	0	0
Intellectual Disabilities	0	0	0	0
Emotional Disturbance	0	0	0	0
Other Disabilities Combined	0	0	0	0

**Dispute Resolution for students served under IDEA Part B (3-21)**

	2017-18	2016-17	2015-16
Complaints with Reports Issued	0	0	0
Complaints Withdrawn or Dismissed	0	0	0
Complaints Pending	0	0	0
Due Process Complaints that Resulted in Hearings Fully Adjudicated	0	0	0
Due Process Complaints that were Hearings Pending	0	0	0
Due Process Complaints Withdrawn or Dismissed	0	0	0
Mediations held not related to due process complaints	0	1	2
Mediations held related to due process complaints	0	3	2
Mediations pending	1	0	0

Mediations withdrawn or not held	0	0	0
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**Percentage of students ages 14-21 (if applicable) exiting IDEA by exit reason**

	2017-18	2016-17	2015-16
Graduated with a regular high school diploma		111	95
Received a certificate of completion		3	1
Dropped Out		3	3
Transferred to regular education	17 as of 3/26/18	38	49
Moved, known to be continuing education		47	48
Other exiting reason			

**Special Education Studies:*****Standard Comparative District Staffing Survey (from District)***

**Instructions:** When listing the number of students served by the District, please only provide the number of resident students who are receiving Special Education services by the District. Additionally, when providing staffing data, please provide the number of full-time equivalent (FTE) positions employed by the District for the 2017-18 school year for each of the positions or classifications listed in the table below. Please ensure that the data is based on FTE and not the number of positions within a classification. Please also provide class size and caseload averages as indicated in the table below.

District Name: \_\_\_\_\_ Campbell Union High School District (non-merit district)

Enrollment Data	2016-17	2017-18
<b>Total District Enrollment</b>	7,569	7,988
# of Students with Disabilities Served by Your District (students ages 6-22)	741	842
# of Students with Disabilities Served by a Nonpublic School (students ages 6-22)	25	19
# of Students with Disabilities Served by a Regionalized Program County programs (students ages 6-22)	146	119



Program Staff		2017-18
Average RSP caseload		25
Average Mild-Moderate SDC class size		15
Average Moderate-Severe SDC class size		12
If you operate a learning center, SAI, or other inclusive model, please indicate the average class size in these programs		16
Classroom Instructional Assistant FTE		.6
1:1 Instructional Assistant FTE		7
Support Staff	Check all applicable boxes	# of FTE
School Psychologist	<input checked="" type="checkbox"/> Management <input type="checkbox"/> Nonmanagement	9
Program Specialist	<input checked="" type="checkbox"/> Management <input type="checkbox"/> Nonmanagement	2
Speech and Language Pathologist	<input type="checkbox"/> District employees <input type="checkbox"/> Contracted Services <input checked="" type="checkbox"/> Both	4.4
Nurses	<input type="checkbox"/> Management <input checked="" type="checkbox"/> Nonmanagement	2
Behavior Specialists  <i>Check if applicable</i> <input type="checkbox"/> do not employ	<input type="checkbox"/> District employees <input type="checkbox"/> Management <input type="checkbox"/> Nonmanagement <input checked="" type="checkbox"/> Contracted Services <input type="checkbox"/> Both	5
Occupational Therapists  <i>Check if applicable</i> <input type="checkbox"/> do not employ	<input type="checkbox"/> District employees <input type="checkbox"/> Management <input type="checkbox"/> Nonmanagement <input checked="" type="checkbox"/> Contracted Services <input type="checkbox"/> Both	.4
Health Technicians  <i>Check if applicable</i> <input type="checkbox"/> do not employ	<input checked="" type="checkbox"/> District employees <input type="checkbox"/> Management <input checked="" type="checkbox"/> Nonmanagement <input type="checkbox"/> Contracted Services <input type="checkbox"/> Both	6

<p>Certified OT Assistants (COTAs)</p> <p><i>Check if applicable</i></p> <p><input checked="" type="checkbox"/> do not employ</p>	<p><input type="checkbox"/> District employees</p> <p><input type="checkbox"/> Management</p> <p><input type="checkbox"/> Nonmanagement</p> <p><input type="checkbox"/> Contracted Services</p> <p><input type="checkbox"/> Both</p>	
<p>Speech and Language Pathology Assistants (SLPAs)</p> <p><i>Check if applicable</i></p> <p><input checked="" type="checkbox"/> do not employ</p>	<p><input type="checkbox"/> District employees</p> <p><input type="checkbox"/> Management</p> <p><input type="checkbox"/> Nonmanagement</p> <p><input type="checkbox"/> Contracted Services</p> <p><input type="checkbox"/> Both</p>	

Special Education Department Staffing	# of FTE
Administrators	2
Administrative Assistants/Secretaries/Clerical Staff	1
Technical Staff (e.g. Accounting Techs, Data Techs)	0

**Thank you.**

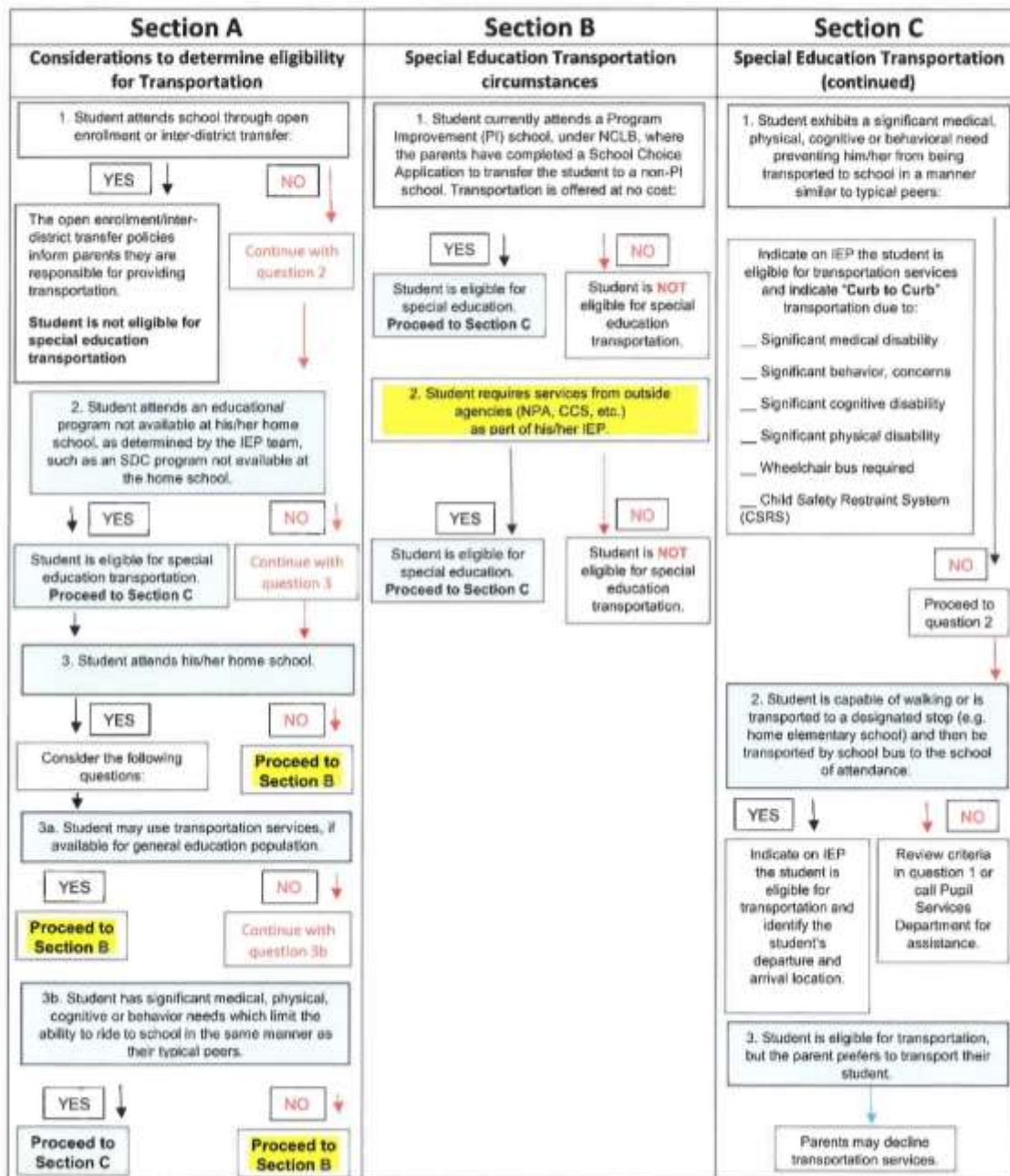
## Appendix B: Sample Transportation Decision-Making Trees

### Sample 1



Orange Unified School District  
Transportation Department

#### Transportation Eligibility Criteria FLOWCHART



Sample 2



Transportation Eligibility Checklist

Name: \_\_\_\_\_ Date of IEP: \_\_\_\_\_ D.O.B. \_\_\_\_\_

The IEP Team will consider student needs including, but not limited to:

**1) Medical Diagnosis and Health Needs:**

Does the student have significant limitations in strength, vitality, or alertness that prevents him/her from riding the regular bus?

☐ Yes ☐ No

Does the student have a medically fragile condition that prevents them from riding the regular school bus?

☐ Yes ☐ No

Does the student have special medical equipment that must be transported on a specialized school bus?

☐ Yes ☐ No

**2) Physical Needs:**

Does the student have a wheel chair requiring a special securement system on the school bus?

☐ Yes ☐ No

Does the student have a visual impairment that prevents him/her from riding the regular school bus?

☐ Yes ☐ No

**3) Safety Needs:**

Does the student's disability or level of functioning prevent them from being able to travel to school independently?

☐ Yes ☐ No

Does the student's disability or level of functioning prevent them from being able to travel to and wait independently at a regular school bus stop?

☐ Yes ☐ No

**4) Behavioral Needs:**

Does the student have a behavior plan that requires certain transportation services?

☐ Yes ☐ No

Is the student's behavior, after implementing behavior plan, so severe that he/she cannot ride the regular school bus?

☐ Yes ☐ No

**5) Program Location:**

Is the student required to attend a program outside of the district of residence geographic boundary?

☐ Yes ☐ No

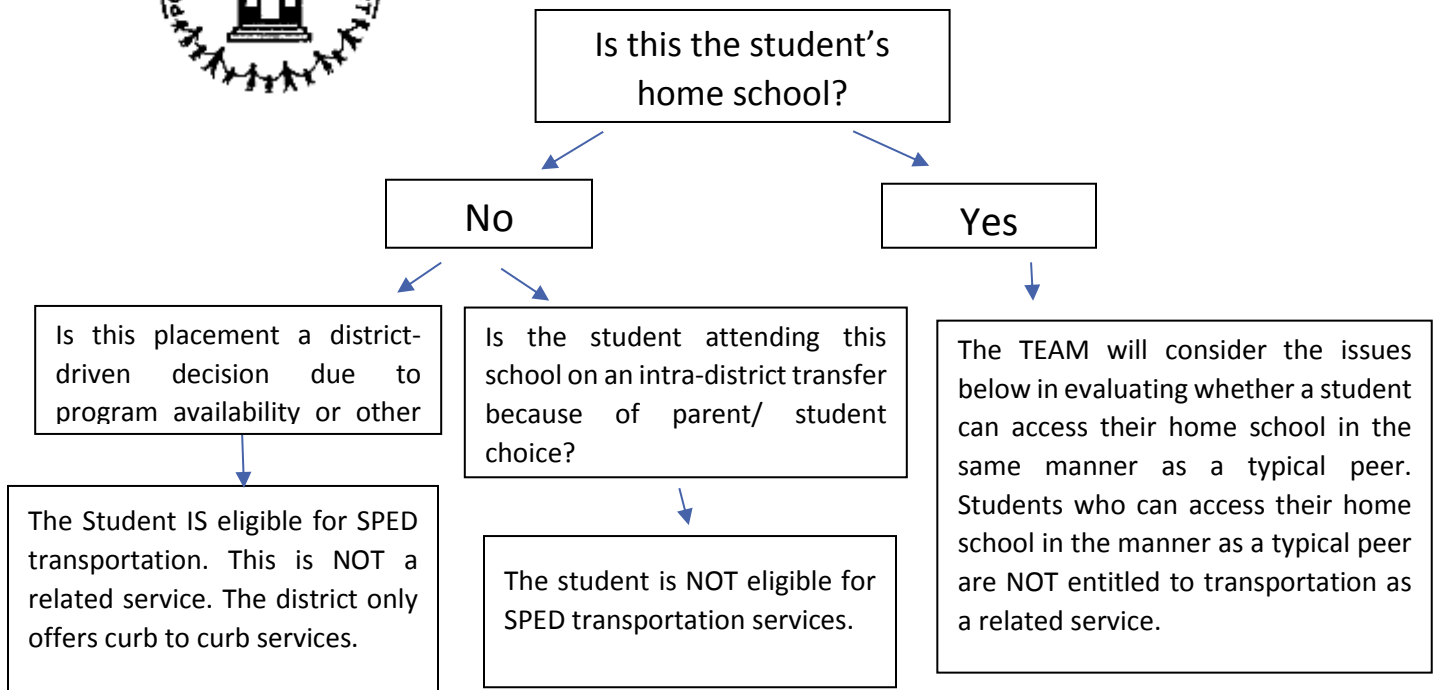
Does the student require special transportation in order to access services designated on the IEP (e.g. occupational therapy, physical therapy, mental health related service, etc.)

☐ Yes ☐ No

*Other needs may also be taken into consideration when the IEP team discusses a students' placement and transportation needs.*



## Consideration for Transportation Services



Issues to consider when deeming whether a SPED student can access the school in the same manner as a typical peer:

- 1) Will this student make reasonable decisions expected of any student in their grade/age cohort?
- 2) Does the student require assistance to and from class, or other related services during the school day?
- 3) Does the student require immediate supervision during breaks such as lunch and recess?
- 4) Are there any significant medical conditions that might impact the student's access to learning such as seizures or epilepsy? Are they controlled?

Please send the Poway Unified School District worksheet to the SPED office before holding an IEP to discuss possible addition of Transportation.

If transportation is added:

- 1) If Transportation is being added as a new service, invite the Program Specialist assigned to your school.
- 2) Please document on the "Special Factors" page in SEIS paying close attention to make accurate selections.
- 3) Make note in "Team Summary" page in SEIS and ensure it is noted within the "Offer of FAPE".
- 4) Complete the IEP transportation checklist, scan and attach in the NOTES tab in SEIS within 5 days of the IEP meeting. It typically takes 10 days for new transportation services to begin.
- 5) Place all original documents in the confidential file.