

# **Community Advisory Committee Advisory Report, March 13, 2026 Regarding the Proposed Santa Rosa City Schools SELPA Local Plan**

*This advisory reflects the review and input of members of the SRCS Community Advisory Committee.*

## **1. Introduction**

The Community Advisory Committee (CAC) conducted a review of the proposed Santa Rosa City Schools (SRCS) SELPA Local Plan in accordance with the advisory responsibilities outlined in California Education Code Sections 56190–56194. The CAC reviewed the Local Plan to assess whether it clearly describes the governance, administrative structure, procedural safeguards, and program implementation necessary to support an effective and compliant special education system. This review was conducted within a limited timeframe following the initial formation of the CAC. Despite the compressed timeline and the absence of an established governance structure for the committee, CAC members conducted a good faith review of the Local Plan and identified several areas where the plan provides limited detail or lacks clarity, including governance transparency, the structure and functioning of the Community Advisory Committee, proposed program changes affecting the continuum of placements, dispute resolution safeguards, and fiscal planning and program capacity.

## **2. Process Concerns**

CAC members have expressed concern that the timeline and structure of the SELPA formation process have limited the committee's ability to provide meaningful advisory input. Under California Education Code §§56194–56195, the Community Advisory Committee is intended to advise the governing board regarding the development and amendment of the SELPA Local Plan. Members have raised concern that the current process has made it difficult for the CAC to fully carry out that advisory role.

Concerns raised during CAC meetings include:

- CAC members were asked to review large portions of the Local Plan during meetings rather than receiving full documents in advance for review.
- Meetings have often involved presentation of materials without sufficient time for committee discussion.
- CAC members were asked to submit individual written comments rather than developing a collective advisory through committee discussion.

- Key governance documents, including CAC bylaws, are still being developed while the SELPA approval process is moving forward.
- Documents have been introduced during meetings rather than being provided sufficiently in advance to allow meaningful review.
- Some materials referenced in the process have not yet been translated, and when translation was requested during the March 5 meeting, members were informed that translation would begin but would require additional time.
- CAC members have also expressed concern regarding the availability of agenda materials and supporting documentation needed to fully review the Local Plan.

These conditions have limited the committee's ability to engage in thorough review and deliberation regarding the proposed SELPA Local Plan.

### **3. Summary of Review Findings**

#### **A. Governance Transparency and Oversight**

**Local Plan Reference:** Section B – Governance and Administration (Pages 16, 24–31)

The CAC review identified limited detail in the Local Plan regarding governance oversight and administrative accountability within the proposed SELPA structure. The plan does not clearly describe evaluation procedures for SELPA leadership, the mechanisms used to ensure transparency and accountability, or how independence is maintained within dispute resolution processes.

Formation of a district administered SELPA raises important questions regarding governance and oversight. In a district administered SELPA, the same district both administers and oversees special education services. For this reason, governance structures must clearly define the roles and responsibilities of SELPA leadership and establish clear oversight mechanisms.

The CAC review noted that the Local Plan does not clearly specify:

- The role and authority of the SELPA Administrator.
- Whether the SELPA Administrator operates independently or under the direct authority of district administration.

- How the performance of SELPA leadership will be evaluated.
- How decisions regarding special education program changes will be reviewed and approved.
- What oversight mechanisms will exist to ensure transparency and accountability in SELPA operations.

Members expressed concern that the proposed governance structure may place operational authority primarily within district administration without clearly describing independent oversight mechanisms. Clear governance structures are particularly important in a district administered SELPA where the same entity both administers and oversees special education services.

## **B. Administrative Roles and Responsibilities**

**Local Plan Reference:** Section B – SELPA Administration (Pages B-2, 27–28)

The CAC review found that the Local Plan provides limited clarification regarding the roles and responsibilities of SELPA leadership and administrative positions. The document does not clearly define how administrative authority will be distributed or how responsibilities will be managed within the proposed SELPA structure.

Specifically, the Local Plan does not clearly describe:

- The role and authority of the SELPA Administrator.
- How the SELPA Administrator relates to district leadership and governance structures.
- How administrative responsibilities for SELPA operations will be distributed among district leadership.
- The procedures used to evaluate SELPA leadership and ensure accountability.

Clear definition of administrative roles and responsibilities is important in a district administered SELPA to ensure transparency, accountability, and effective oversight of special education services.

### **C. Community Advisory Committee Structure**

**Local Plan Reference:** Section B – CAC Governance (Pages 22, 26; B-5–B-6)

The CAC review found that the Local Plan provides limited detail regarding the structure and operation of the Community Advisory Committee. While the plan references the existence of a CAC, it does not clearly describe membership composition, governance procedures, or the process by which CAC recommendations are formally communicated to the Board of Education. These issues are discussed further in the CAC governance section of this advisory.

### **D. Accessibility of Referenced Procedures and Documents**

**Local Plan Reference:** Section B – Policies, Procedures, and Programs (Pages B-13–B-22; B-16–17)

The CAC review found that several procedural documents referenced within the Local Plan—including special education procedure manuals and related guidance materials—were not readily accessible through district or SELPA websites at the time of review. The absence of publicly accessible procedural documentation may limit transparency and create challenges for families, educators, and community members seeking to understand how policies and procedures are implemented.

### **E. Operational Implementation of Services**

**Local Plan Reference:** Section B – Program Operations (Pages B-13, B-23)

The CAC review also identified limited detail in the Local Plan regarding operational procedures supporting program implementation. In particular, the document provides minimal information regarding the management and distribution of specialized equipment and the development or selection of curriculum used in special education programs.

### **F. Description of Services**

**Local Plan Reference:** Section E – Annual Service Plan (pages E-1–E-14)

The CAC review noted that Section E frequently states that Santa Rosa City Schools will provide the full continuum of services to students based on the services identified in each student's IEP. However, the Local Plan provides limited description of how that continuum of services will be implemented within the proposed SELPA structure. In several entries, the plan states that services

will be provided if identified in the IEP but does not describe the program structures, staffing models, or service delivery methods through which those services would be provided.

#### **4 .Program Changes and Elimination of Mild-to-Moderate Special Day Classes (SDC)**

Local Plan Reference: Section B – Program Operations (pages B-13, B-23)

The CAC review found that the Local Plan does not address how the district will implement the elimination of mild-to-moderate Special Day Class (SDC) programs while maintaining the continuum of services required under federal special education law. Although the Local Plan describes the district’s overall special education program structure, it does not explain how the removal of these placements will be implemented in practice.

School districts may redesign programs or adjust service delivery models; however, the Individuals with Disabilities Education Act (IDEA) requires that placement decisions remain individualized and determined by Individualized Education Program (IEP) teams based on the needs of each student. District program changes cannot predetermine placement decisions or limit the range of placements available to IEP teams.

The Local Plan does not describe how students currently served in mild-to-moderate SDC programs will continue to receive services consistent with their IEPs once these programs are eliminated.

##### **A. Individualized placement decisions**

Federal regulations require that placement decisions be made by the IEP team based on the individual needs of each student (34 C.F.R. §300.116). Placement decisions may not be based on administrative convenience, staffing availability, or the configuration of district programs.

Because the district has eliminated an entire category of placement, CAC members expressed concern that program availability may now influence placement decisions in ways that conflict with the requirement for individualized IEP team decision-making. The Local Plan does not explain how the district will ensure that IEP teams retain full authority to determine appropriate placements when previously available program options have been removed.

##### **B. Least Restrictive Environment**

IDEA requires that students with disabilities be educated in the least restrictive environment appropriate to their individual needs (34 C.F.R. §300.114). The law does not require that all students be educated in general education classrooms.

For some students, mild-to-moderate SDC placements provide the specialized instruction necessary for students to receive a Free Appropriate Public Education (FAPE). The Local Plan does not describe how students whose needs previously required this level of specialized instruction will be served within the district's remaining program structure.

### **C. Continuum of placement options**

Federal law requires school districts to maintain a continuum of alternative placements to meet the needs of students with disabilities (34 C.F.R. §300.115). This continuum includes general education placements, resource services, special classes, and more intensive settings when necessary.

The CAC review found that the Local Plan does not describe how the district will maintain a full continuum of placements following the elimination of mild-to-moderate SDC programs. Removing a category of district-operated placement raises questions regarding how the continuum will function in practice for students whose needs fall between resource services and more intensive placements.

### **D. Procedural implications of placement changes**

Changes to student placements require IEP team meetings with parent participation. When district program changes affect the placements of multiple students, a substantial number of IEP meetings may be required in order to review and determine appropriate placements.

The Local Plan does not address how the district will manage these placement reviews, including the time and administrative capacity required to conduct IEP meetings for students currently served in SDC programs.

### **E. Potential dispute resolution implications**

Program changes that affect student placements may increase requests for facilitated IEP meetings, mediation, or due process hearings when families disagree with proposed placement changes. The Local Plan does not address how the district has planned for the administrative or fiscal implications associated with these dispute resolution processes.

### **F. Conclusion**

Because the Local Plan does not address how the elimination of mild-to-moderate Special Day Class programs will affect placement decision-making, the continuum of placements, or the procedural operation of the IEP process, CAC members were unable to identify advisory recommendations within the Local Plan that would remedy these issues.

These omissions involve core elements of special education program structure rather than minor implementation details. As a result, CAC members concluded that the Local Plan does not provide sufficient information regarding how these program changes will be implemented while maintaining compliance with IDEA placement requirements.

These concerns contribute to the committee's broader determination that the proposed SELPA Local Plan does not provide sufficient clarity regarding program structure and implementation to support adoption in its current form.

### **5. Alternative Dispute Resolution (ADR)**

Access to neutral dispute resolution services is an important support for families of students with disabilities. Currently, Alternative Dispute Resolution (ADR) services are available through the Sonoma County SELPA regional program, which provides neutral facilitation and mediation services independent from individual districts.

Maintaining access to dispute resolution services that are clearly independent from district administration is an important safeguard for families and can help prevent disagreements from escalating into formal due process proceedings.

CAC members expressed concern that under a district administered SELPA structure, dispute resolution services could potentially be administered internally by the district rather than through an independent regional system. Maintaining access to neutral mediation and facilitated IEP processes is an important safeguard for families, particularly during periods of program change.

During the CAC review process, concerns were raised regarding:

- Whether SRCS will continue participation in the Sonoma County SELPA ADR system.
- Whether ADR services could instead be administered internally by the district.
- The importance of maintaining neutral mediation services that remain independent from district administration.

## **6. Fiscal Considerations and Program Capacity**

Review of the SELPA budget included in the Local Plan indicates that a substantial portion of the district's special education expenditures are directed toward contracted services and non-public school placements. Budget documents reviewed by the CAC indicate approximately \$14.6 million in contracted staff (NPA services), \$10.3 million in non-public school placements, and approximately \$28.3 million in services and operational costs, with approximately \$46 million contributed from the district's general fund.

These figures indicate that a significant share of the district's special education services are currently provided through external providers rather than district-operated programs. In a district administered SELPA structure, this level of reliance on contracted services and outside placements represents a significant financial obligation that must be carefully managed through strong internal program capacity.

CAC members also discussed the district's internal autism program development. Sonoma County Office of Education previously operated evidence-based autism classrooms serving Santa Rosa City Schools students. The district later removed its students from those classrooms and created its own program, now known as RISE, with the stated goal of reducing costs and building internal program capacity.

The intent of bringing these programs back to the district was widely understood to include the development of strong district-operated autism services. However, the SELPA budget shows that a substantial number of students continue to be served in non-public school placements, with a significant portion of those placements occurring at programs such as Anova, which provides specialized autism services using evidence-based instructional models.

CAC members noted that this pattern raises questions regarding the district's current program capacity. If internal programs such as RISE were intended to expand the district's ability to serve students with autism within district programs, the continued reliance on specialized non-public schools for these services suggests that internal program capacity may not yet meet the needs of all students requiring intensive supports.

At the same time, the district has moved forward with the elimination of mild-to-moderate Special Day Class placements. CAC members expressed concern that reducing existing district-operated programs while continuing to rely heavily on external placements may increase rather than reduce long-term fiscal exposure.

Operating as a district administered SELPA places full financial responsibility for special education services on the district. When internal programs do not meet the needs of students, districts must fund outside placements or contracted services. In addition, program changes that affect student placements may result in increased mediation requests, complaints, or due process proceedings when families disagree with proposed placement changes.

CAC members noted that the projected fiscal benefit associated with operating as a district administered SELPA is relatively limited when compared with the scale of the district's overall special education expenditures. In the absence of clear planning for internal program development and placement transitions, the potential costs associated with additional outside placements, contracted services, or dispute resolution processes may exceed projected administrative savings.

For these reasons, CAC members concluded that the Local Plan does not clearly describe how the district intends to strengthen internal program capacity while managing the financial risks associated with operating a district administered SELPA.

### **7. Fiscal Implications of a district administered SELPA**

Operating as a district administered SELPA places full financial responsibility for special education services on the district rather than distributing costs across multiple member districts. This structure can increase financial exposure when student needs require intensive services, outside placements, or specialized providers.

CAC members noted that the Local Plan provides limited detail regarding how the district will manage this financial risk within a district administered SELPA structure. The plan does not clearly describe the fiscal safeguards, planning strategies, or program capacity development that would allow the district to absorb fluctuations in service needs while maintaining stable special education programs.

### **8. Community Input**

Community members reviewed sections of the proposed Local Plan and provided written comments identifying areas where additional clarification or documentation may be necessary. These comments informed the CAC's review and are reflected in the summary findings above.

CAC members also noted concerns regarding the level of outreach and opportunities for community participation during the SELPA formation process. Some community members reported difficulty accessing documents in a timely manner, challenges joining virtual meetings, and questions that remained unanswered during the review process.

Members also expressed concern that outreach regarding the CAC and SELPA formation process may not have reached all segments of the SRCS parent community. Outreach efforts were primarily conducted through ParentSquare notifications, and some parents indicated that they were not aware of the CAC application process or opportunities to participate.

Concerns were also raised regarding access for families whose primary language is not English. Some members of the community expressed that additional outreach and language accessibility may be necessary to ensure that families from diverse linguistic backgrounds are able to participate fully in the CAC process.

Despite these challenges, CAC members made every effort to incorporate community concerns and feedback into this advisory review.

## **9. CAC Membership Composition and Governance Structure**

California Education Code requires that each Special Education Local Plan Area maintain a Community Advisory Committee composed of representatives from specified categories, including parents, educators, administrators, and community members. The law further requires that a majority of the committee membership be parents, and that a majority of those parent members be parents of children with exceptional needs (Education Code §56193).

At present, the CAC has not yet been established in a manner that meets the structural requirements outlined in California Education Code, including the requirement that at least 51 percent of the membership be parents, and that the committee operate under an adopted governance framework. The current committee membership is disproportionate in its ratio of parents to staff, with some individuals serving on the committee who are staff and also parents in SRCS of children with exceptional needs. Because these foundational elements are not yet in place, the CAC struggles to be able to carry out its statutory role of reviewing and advising on the SELPA Local Plan. The Local Plan relies on the participation of a properly constituted CAC to provide this oversight and advisory function, and therefore cannot accurately represent that the CAC review and participation required under Education Code have occurred.

This situation appears to be the result of the CAC being in the early stages of formation without a defined governance structure. The current committee has not yet adopted bylaws establishing membership categories, selection procedures, or mechanisms to ensure the legally required parent-majority membership. In addition, the current membership process has not clearly identified how parent representation will be maintained over time, how vacancies will be filled, or how compliance with statutory

composition requirements will be ensured. At present, there is also no governing body or chairperson to formally approve advice to the SRCS Board.

Without adopted bylaws and a clearly defined membership structure, the CAC lacks the framework typically used to ensure compliance with Education Code requirements governing CAC composition and function. Establishing bylaws that define membership categories, ensure compliance with the parent-majority requirement, and outline procedures for member selection and replacement will be necessary for the CAC to fully fulfill its advisory responsibilities under Education Code Sections 56190–56194 and to effectively advise the Board of Education on the SELPA Local Plan.

While the members of this CAC have made every effort to conduct this review in good faith and in alignment with the responsibilities outlined in the Education Code, the current formation of the CAC has not yet established the governance and membership structures described in Education Code §56193, including adopted bylaws and confirmed parent-majority representation. For that reason, the committee believes it is important that the advisory statement acknowledge these structural limitations as part of the context in which this review was conducted. As a result, the SRCS SELPA Local Plan relies on a CAC structure that has not yet been fully established under Education Code requirements.

#### **10. Continuation of the Community Advisory Committee**

The process of forming this Community Advisory Committee has been valuable for the SRCS community. Special education systems frequently involve differing perspectives among parents, staff, and administration, and the CAC plays an important role in supporting collaboration through parent education, community input, and advisory oversight related to special education programs and services.

SRCS is a large district serving students with a wide range of needs and a diverse community of families. For many parents, the CAC is the primary public forum through which they can receive parent education, better understand their rights within special education, and provide input to the district regarding programs and services.

For this reason, CAC members recommend that, regardless of the Board's decision regarding adoption of the proposed SELPA Local Plan, Santa Rosa City Schools establish and maintain a functioning Community Advisory Committee consistent with the requirements outlined in California Education Code Sections 56190–56194. A properly constituted CAC can provide an important forum for transparency, collaboration, and ongoing community input as the district works to strengthen its special education system.

The members of this committee strongly support a CAC that focuses on constructive parent education, transparency, and collaborative oversight of the district's special education programs. At the same time, the CAC must acknowledge that when significant program changes affect student placements, families may seek formal remedies through processes such as California Department of Education complaints or due process proceedings. In such circumstances, the CAC's responsibility to support parent education may include helping families understand how to access those procedural safeguards.

A properly constituted Community Advisory Committee will be essential, as the district works to strengthen its special education system.

### **11. Advisory Recommendation to the Board**

The Community Advisory Committee conducted this review in good faith and within a limited timeframe following the initial formation of the committee. Despite these constraints, CAC members carefully reviewed the proposed Santa Rosa City Schools SELPA Local Plan and identified several areas where the plan provides limited detail regarding governance, program implementation, fiscal planning, and procedural safeguards.

Based on its review of the proposed Santa Rosa City Schools SELPA Local Plan, the Community Advisory Committee identified the following findings:

- The Local Plan demonstrates that creating a district administered SELPA may not be financially sound.
- Oversight of special education services could be reduced under a structure in which the same district both administers and oversees its own SELPA.
- The district is currently experiencing significant fiscal instability, raising concerns about its ability to assume full financial responsibility for SELPA operations.
- The projected savings associated with forming an independent SELPA—estimated at approximately \$600,000—appear limited and remain speculative when compared with the potential financial risks. Furthermore, the CAC has not yet had the opportunity to review cost estimates for contracting with SCOE and the current SELPA for services the district is not yet prepared to implement independently. Without this information, it is difficult to determine whether the projected savings would be realized or significantly reduced by the cost of these contracts.
- The district already relies heavily on special education expenditures, including substantial spending on contracted services and non-public school placements.

Taken together, these factors raise serious concerns about whether forming a district administered SELPA at this time represents a financially responsible or operationally sustainable course of action.

For these reasons, the Community Advisory Committee advises the Board not to adopt the proposed SELPA Local Plan or proceed with the formation of a district administered SELPA at this time.

The CAC appreciates the opportunity to review the proposed Local Plan and provide this advisory input to the Board of Education.

*CAC Members: Members are identified by their role or affiliation for transparency and to reflect the representation categories described in California Education Code §56193.*

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