

Board Memorandum
Santa Rosa City Schools – Public Hearing on Proposed SELPA Local Plan

Date: April 8, 2026

To: Board of Education
From: Lisa August-Hulme, Interim Superintendent
John Fischer, Exec Director, Special Services
Re: Santa Rosa City SELPA Local Plan [Second Reading and Public Hearing]

Purpose

This item is presented for second reading and public hearing, and for the Board’s consideration of whether to approve the proposed Local Plan to establish a Santa Rosa City (SRC) SELPA.

Clarifying the Roles: School District vs. SELPA

The Board asked for clarification regarding the respective roles of a school district and a SELPA.

1. School District Responsibilities (SRCS)

Under state and federal law, the school district is directly responsible for ensuring that students with disabilities receive a Free Appropriate Public Education (FAPE). This includes:

- Developing and implementing IEPs
- Conducting assessments
- Providing instruction and related services
- Monitoring student progress
- Ensuring compliance with procedural safeguards

These responsibilities apply regardless of SELPA structure and remain with SRCS whether it participates in a large regional SELPA, or operates its own regional services as a SELPA.

2. SELPA Responsibilities

A SELPA (Special Education Local Plan Area) is a governance, coordination, and funding structure, not a service provider to students *per se*. Its primary functions include:

- Developing and maintaining the Local Plan
- Receiving and allocating state and federal special education funding
- Coordinating regional programs and services
- Supporting compliance, data reporting, and interagency coordination
- Facilitating collaboration among participating districts

A SELPA does not replace the district’s legal responsibility to serve students. Changing SELPA structure does not change SRCS’s responsibility to serve students.

Key Consideration for the Board: The central question before the Board is not whether SRCS can serve students with disabilities.

Rather, the question is whether SRCS should:

- Continue operating within a large, regional SELPA structure, or
- Establish a locally governed SELPA that allows for greater control, transparency, and alignment with student needs.

The decision before the Board is how this responsibility is best organized, governed, and funded.

Why Staff Recommends a Local SRCS SELPA

Staff recommends approval based on the following:

1. Local Control and Accountability

A local SELPA allows SRCS to make decisions regarding funding, programs, and services directly at the district level, with accountability to the Board and community.

2. Increased Transparency

Operating locally provides clearer visibility into:

- Special education funding
- Program performance
- Student outcomes

This supports more responsive and informed decision-making.

3. Alignment to SRCS Student Needs

A large regional SELPA must balance the needs of 44 LEAs.

A local SELPA allows SRCS to focus exclusively on its own students and programs.

4. Operational Efficiency

A regional structure requires coordination across many districts, which can create administrative complexity. A local SELPA allows for more streamlined and nimble operations.

5. Capacity to Implement

SRCS already:

- Develops IEPs

- Provides instruction and services
- Partners with other agencies and oversees NPS/A as needed
- Ensures compliance

The Local Plan does not create new legal obligations—it provides a new structure for organizing and overseeing work, much of which already is or can be performed by SRCS.

Implementation Approach

The Local Plan establishes a framework for governance and compliance. It is not intended to represent a fully built operational system at the time of approval.

If approved, SRCS will:

- Implement systems in phases, including Inaugural SELPA CAC if approved
- Build capacity over time
- Utilize partnerships, interagency agreements, and contracts where appropriate
- Provide ongoing updates and oversight to the Board

Local Plan Development Process

The Local Plan was developed in accordance with statutory requirements, including:

- Board direction (December 17, 2025)
- Development by a Local Plan Committee
- Review by a Community Advisory Committee (CAC) over a 30+ day period
- Written CAC input incorporated into the draft

Compliance with Statutory Process Requirements

During the first reading, questions arose regarding whether SRCS complied with statutory requirements related to the development of the Local Plan, including the Community Advisory Committee (CAC) and Local Plan Committee.

Staff takes these concerns seriously and offers the following clarification:

1. Applicability of Certain Education Code Provisions

Certain provisions of the Education Code governing CAC composition and Local Plan Committee formation are written in the context of existing SELPAs with established governance structures.

Because SRCS is forming a new SELPA, those structures do not yet formally exist.

2. Consultation with the California Department of Education (CDE)

To ensure appropriate compliance, staff consulted directly with the California Department of Education (CDE) regarding:

- Timing of CAC formation
- Expectations for Local Plan development process prior to SELPA approval
- Appropriate steps in the absence of an existing SELPA structure

CDE advised that:

- Districts should make good faith efforts to gather a CAC to review and advise during Local Plan development
- Formal CAC bylaws would be developed after Local Plan approval, once the SELPA is established

3. Good Faith Efforts to Engage Stakeholders

Following Board direction to develop a Local Plan, in January 2026 SRCS recruited a Local Plan Committee to support development and review of the draft Local Plan. In future years, this committee will include parent-members of the CAC or recommended by the CAC. However, for this initial Local Plan development, there was no existing CAC for the SRC SELPA. Nonetheless, some contributors on the Local Plan Committee did later serve as members of the Founding CAC.

Consistent with CDE guidance, SRCS:

- Appointed a “Founding” CAC to review the draft Local Plan
- Provided the draft Local Plan to the CAC for at least 30 days of review
- Held multiple CAC meetings to review and discuss the plan
- Received a written CAC Advisory Statement submitted to the Board
- Considered and incorporated feedback into Local Plan revisions presented to the Board

4. Responsiveness to Input

Staff reviewed CAC and committee input and made revisions to the Local Plan prior to bringing it forward for Board consideration. The law neither contemplates nor requires subsequent 30-day review(s) by the CAC if the SELPA revises the Local Plan in response to CAC advice and comment, as occurred here.

5. Ongoing Commitment

Upon approval of the Local Plan, SRCS will:

- Recruit new CAC membership, if applicable, in accordance with Education Code and Local Plan procedures, including peer selection processes
- Support development of CAC bylaws
- Continue to expand stakeholder engagement
- Provide ongoing opportunities for parent and community input

Summary

Staff followed applicable legal requirements and, where statutory provisions were not directly applicable to a newly forming SELPA, sought and followed guidance from CDE.

The District made good faith, proactive efforts to engage stakeholders and incorporate input into the Local Plan.

Next Steps if Approved

If approved, the District will:

- Submit the Local Plan for County and comments, CDE review
- If the County Superintendent does not approve the Plan, SRCS may appeal to CDE
- Continue coordination with the Sonoma County SELPA
- Negotiate interagency agreements
- Develop systems and procedures
- Return to the Board with updates as implementation progresses

Recommendation

Staff recommends that the Board approve the proposed SRCS SELPA Local Plan.