

Educational Strategic Planning LLC

Santa Rosa City Schools Special Education Review



November 18, 2024

**Dr. William Gillaspie
Strategic Planning LLC
Executive Officer**

Intelligence plus Character
That is the Goal of True Education

Martin Luther King Jr.

Educational Strategic Planning LLC

Special Education is Not a Place

It is a Service

November 18, 2024

Dr. Daisy Morales, Superintendent

Santa Rosa City Schools

110 Stoney Point Road Suite 210

Santa Rosa, CA 95401

Dear Superintendent Morales:

August 28, 2024, Santa Rosa City Schools (SRCS) and Educational Strategic Planning (ESP) LLC entered into an agreement for ESP to conduct a review of the districts special education delivery system. The agreement stated that ESP would perform the following:

The scope and objectives of this study are to:

1. Determine whether the district is over identifying students for special education services compared to statewide average, and make recommendations that will reduce over identification, if needed.
2. Analyze special education teacher staffing ratios, class and caseload size using the statutory requirements for mandated services and statewide guidelines.
3. Review the efficiency of staffing allocation of special education assistants throughout the school district. Review the procedures for identifying the need for the process for placement and cost efficiencies.
4. Determine the district's general education fund contribution to special education and make recommendations for greater efficiency.
5. Review the cost of special education transportation and the process of determining eligibility for students to receive specialized transportation.

6. Review the cost and placement process for students receiving extended school year services.
7. Provide an analysis of all staffing and caseloads for related service providers: speech therapists, psychologists, occupational/physical therapists, behavior specialists, adaptive physical education teachers, credentialed nurses and others. Review how these services are related to contracted services.
8. Determine, if the district needs to develop a district wide stakeholder's taskforce to study, implement, and monitor the special education system. Assist the district in the development such taskforce committee, if necessary.
9. If requested, assist the district in developing an action plan to implement special education findings and recommendations that would be monitored by the district-wide taskforce committee.
10. Review the district's procedural manual, and determine whether the district has systems, procedures, and policies in place that provides for a coherent and cohesive district wide special education delivery system that provides services to All students.

The final report will include findings, commendations and recommendations as they related to the scope of study objectives. At the request of the district four additional scope of study objectives were added at time of on-site review:

1. Disproportionality of EL Students placed in Special Education
2. Review effectiveness of Student Study Team
3. Increase of ADA, how it impacts the district fiscally
4. Review cost of Non-Public Schools

We appreciate the opportunity to serve Santa Rosa City Schools and extend our thanks to all the staff for their assistance during on-site field work, which was conducted October 14-18, 2024.

We hope the results are beneficial to all concerned. Recommendations and/or suggestions from the report are based on district data, comparable size school districts, CDE information systems data, and staff interviews.

This is a management assistance report and recommendations have no binding authority to be implemented. This draft report is being reviewed by district staff to assure accuracy, and as a result the final report will be present to the district superintendent. Depending on the availability of data from the district, is to the extent all study objectives were completed.

A Summary of the study objectives are as following including, but not limited to:

- Effectiveness of Special Education Delivery System:
 - The study will examine the efficiency and effectiveness of the current special education services.
 - It will assess both **fiscal** (budget, spending, resource allocation) and **programmatic** aspects (types and quality of services provided) to ensure they meet students' needs.

- District Culture and Integration:
 - A key question is whether the district's culture supports viewing special education students as part of the general education system first.
 - This means seeing students as **general education students who need additional support** rather than categorizing them solely as special education students.
 - This cultural view would support a more inclusive approach to education.

It will be determined whether the district is providing a delivery model to reflect “**Reforming Education to Serve All Students, Report of California’s Statewide Task Force on Special Education**.” The district should be providing a delivery system in relationship to One System Alignment with the One System Model. This would aim to integrate special education within the broader general education framework, ensuring a unified, inclusive system where all students' needs are met seamlessly.

Sincerely

William P. Gillaspie

William P. Gillaspie, Ed.D.

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Introduction

Background

At the request of the Santa Rosa City Schools (SRCS), Educational Strategic Planning (ESP) LLC was contracted to review the status of the district's special education delivery system in determining which costs are causing the district to exceed the statewide average of encroachment on the general fund and make recommendations for greater efficiency. Within that review the district has established 12 study objectives as listed in the study report.

This is the perfect start for a program review with recent hiring of the District Superintendent, Executive Director, Special Services and appointment of Coordinator of Special Services who is knowledgeable and experienced school administrator. They will be able to develop an administrative organizational plan, ensure fiscal accountability and strengthen the special education student services delivery model between board, superintendent, staff, parents and community.

The executive director of special services has taken on a department with highly skilled and dedicated staff who, despite their individual expertise, have operated without consistent leadership or structured guidance in recent years. This lack of direction has left the department without written systems or a cohesive special education delivery framework. The absence of such structure runs counter to the recommendations set forth in the **2015 One System report**, which emphasizes the importance of a unified, district-wide approach to special education. Developing and implementing structured policies and written systems will be essential to building a coherent service delivery model, enabling staff to work effectively within a unified framework to support students comprehensively across the district.

Throughout the interview process the staff were passionate, hardworking, and professional. The Special Services Department is committed to serving all students. School staff reported they are proud to work for the district and are committed to providing the best services to all students.

It is imperative for stakeholders to understand the status of the district's fiscal special education program and make certain that policies, procedures and systems ensure legal compliance and meaningful education for all students. In addition, the district should continue reviewing budget development and monitoring and determine appropriate educational options for students who are below academic grade level before placement in special education.

The district does not have a coherent system of education for all children. Within a coherent system, students who struggle to compute or read will receive specialized help as soon as they need it in general education. These children's difficulties are identified in preschool or earlier. For years, research has shown for years that with appropriate support, children with early signs of learning problems can catch up with their peers by the time they enter kindergarten. Within a coherent system, transitional kindergarten, kindergarten, and elementary school teachers should have readily available evidence-based academic and behavioral instructional strategies and

interventions for targeting specific needs. The child who continues to struggle receives more intense levels of support.

Central to a coherent system is the development of a culture of collaboration and coordination between the district and the numerous educational and family service agencies that influence a child's education. The success of all organizations is based on effective and efficient human and fiscal resources and a balanced budget that reflects transparency, solvency and integrity.

SRCS District comprises of a common administration, common board of education representing Santa Rosa Elementary and Santa Rosa High School District. According to Education Code 35110 these districts report demographics and staff as two separate districts yet their financial information is filed as they are a signal district. For Special Education purposes, all special education staff, central office administration and budget are treated as a single district special education program.

Santa Rosa City School District is a medium-sized PreK-12 school district serving approximately 14,200 students and is comprised of 12 elementary schools, and 4 middle schools, and 5 high schools. Alternative Education programs include Ridgway High School, Summer School, Independent Study, Bridge Academy for 8th graders, Credit Recovery, and Home and Hospital for students unable to attend school due to illness.

The District must acknowledge that students receiving special education services are, first and foremost, general education students. This perspective shifts the focus from viewing special education as a diverse learner, the District can foster a more inclusive environment where all students benefit from the same educational opportunities.

This foundational principle is woven throughout this report, serving as a lens through which to analyze current District practices and assess how effectively they promote the inclusion of special education students in general education programs. Emphasizing this approach not only enhances educational equity but also ensures that all students receive the support they need to thrive academically and socially. Separate entity to recognizing it as an integral part of a broader support system within general education. By understanding special education services as one of many resources available to support students with special needs.

The District needs to recognize that students who receive special education services are general education students first; they must operate with the understanding that special education services are one of many systems of support under general education rather than a place where students go to receive more or different services. These tenets are used throughout this report to analyze the District practices and how they provide inclusion of special education students in the general education programs.

Study and Report Guidelines

ESP visited the district on October 14-18 2024, to conduct interviews with district administrators, school administrators, special and general education teachers, special education aides, community members, and related service providers. Following fieldwork, ESP reviewed and analyzed data and documents and conducted additional interviews. This report is the result of those activities.

ESP reports focus on systems and processes that may need improvement. Those that maybe functioning well are generally commend on ESP report. In writing this report, ESP asks for assistance from the district highly qualified technical experts to assist in editing proofing reading of grammar and sentence structure.

Study Team

The study team was composed of the following:

Dr. William Gillaspie, Chief Executive Officer

Educational Strategic Planning LLC

About Educational Strategic Planning LLC

Dr. William Gillaspie

Experienced Administrative Chief Executive Officer with a demonstrated history of working in the management industry. Specializes in development of Special Education Instructional Design, Organizational and Leadership, Administrative mentoring and coaching, fiscal and community board governance. Dr. Gillaspie is a business development professional with a Doctorate of Education focused in Education and Leadership from University of San Francisco.

With over 35 years of experience in public education, Dr. Gillaspie has vast experience in educational leadership in California as a County Superintendent, Assistant Superintendent Educational Services, Director of Special Education, Teacher and School Psychologist.

Worked as Deputy Administrator Officer for Fiscal Crisis & Management Assistance Team (FCMAT) from 2002-2016.

Dr. Gillaspie has conducted more than 250 educational studies throughout California schools including but not limited to working in the following: County offices of education, school districts K-8 and K-12 unified, charter schools and SELPAs.

The following are additional highlights of Dr. Gillaspie's experience:

- Vast experience in teaching at all college levels, community college, California State Universities, California Universities, as well as a keynote speaker nationally
- Served for three years as Adjunct Field Supervisor at the California State University (CSU), Sacramento, College of Education, Department of Educational Leadership and Policy Studies. Provided supervision of Internships of school principals throughout Northern California
- Adjunct Director of Pupil Personnel Services for Fresno Pacific University, Associate Professor from 2002-2015, Bakersfield Center
- Started company Educational Strategic Planning LLC in 2016. Serving all school districts, county, county offices of education and SELPAs throughout California. Providing administrative mentoring/coaching and conducting management assistance studies
- Served as Fiscal Advisor for Santa Clara County Office of Education, for fiscal and fiscal and school community governance support to Alum Rock Union Elementary School District, during 2018-19 school year
- Board Member for School Innovations and Achievement (SI & A) Attendance Institute, 2019

Credentials:

- Lifetime valid Pupil Personnel Services with emphasis in counseling and school psychology
- Lifetime valid California Standard Secondary Teaching Credential in Psychology
- Lifetime valid California Administrative Credential
- Lifetime valid credentials in California Community Colleges with emphasis in teaching psychology and physical education.
- Doctor of Education, School of Education, University of San Francisco

Executive Officer of Educational Strategic Planning LLC, Dr. William Gillaspie

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Executive Summary

Through the leadership of the district superintendent, the district governing board's Strategic Plan 2019-24 needs to be updated, with a set of clear vision, mission, goals, and direction for SRCS District. This should include prioritization of inclusion to support students with disabilities in general education settings.

As a result of this study, it is a perfect place for the newly appointed district superintendent, executive director and coordinator of special services to begin in developing a district-wide special education delivery system that is cohesive and coherent, consisting of systems, procedures, policies and goals. **These systems should follow the 2015 report on one system.**

Accordingly, the Special Education Department (Special Services) should consider developing a departmental vision and mission statement and create a department strategic plan to support the governing board's goals. The district needs to emphasize and better support continuum of service options to give students in special education access to general education, and doing so is a clear district need.

The District needs to provide ongoing professional development for general and special education teachers, special education aides, related service providers, administrators, and other staff on evidence-based practice identified in **the 2025 report on one system**, such as MTSS to better support special education students in general education.

Based on interview with district administration and school staff, interventions are lacking throughout the district, where principals and school site are providing MTSS, may lack the training and direction from the district.

It was found that the school sites in SRCS District are not using Student Study Teams (SST) process and guidelines. There is no SST Board Policy, Administrative Regulations, or SST Procedural Handbook. Forms are on line at school sites. SST training is needed at all sites for all staff members involved in SST. All staff expressed that there is need for comprehensive formal training on the district SST process and development on systems, guidelines and handbook.

The district k-12 student enrollment as of October 14,307, and the number of students identified as students with disabilities was 2,771. This is equivalent to 19.37% of student population within the district.

The Statewide average percentage is 12.48%. The number of students over-identified as compared to the state-wide average is 983 students which results to the district fort over identifying students is \$26,107,647. The average cost in the district for an identified student with special needs is \$26,569.29. Due to limited interventions, such as effective SSTs and MTSS, the district over identifies students with special needs.

According to data provided by the district, English Language Learning makes up 22% of students with disabilities, compared to 14% overall. Presently, there are 796 students district-wide identified as EL/SWD. The percentage of English learners in special education is not close to the percentage of these students in the district as a whole, consequently, the district is over identifying English Learners for special education.

It was found that 68% of EL students are not in the general education setting more than 80% of their day. This is in direct conflict with the **2015 report on one system.**

Educational Services has produced a document entitled “**Continuous Improvement Collaborative Extended Learning**” dated September 19, 2024. This an excellent document and district should continue to move forward with implementation of findings and recommendations.

It was stated throughout interviews, SRCS contracts with outside agencies for a significant number of special education assistants. The district should consider negotiating in good faith with CSEA to make necessary adjustments in the contract that would assist the district in employing their own instructional assistants, instead of relying on contracted staff.

The district’s general fund contribution is projected to be \$41,939,351.00 or about 56.96% of the special education budget not including transportation and NPS/NPA services, which would increase the overall support from the general fund. About 38% of the special education funding comes from AB 602.

The statewide average of 64.3% as calculated by School Services of California for the 2024 school year, is the average of school districts contribution, from the general fund to special education budget operations. SRCS is commended for being below the state wide average of general contribution. The district contributes 56.96% of general fund to balance the special education budget projected for 2024-25 school year.

State special education funding is meant to pay the additional costs of serving students with disabilities. The California Legislative Analyst’s Office (LAO) estimates that education for students with disabilities cost on average more than twice as much as educating general education students. In followings **One System, Reforming Education to Serve All Students, Report of California’s Statewide Task Force on Special Education**, SRCS should make every effort to have students with special needs remain in general education classroom, with support from special education that benefit the student.

Using 2023-24 as a baseline, the district enrollment was 12,853 and the actual ADA was 11,747.70, which is a ratio of district ADA to Enrollment of 91.40 In 2023-24, if the district would have increased the ADA, ratio anywhere between 1-5% the financial benefit to the district could with an increase of funding \$5,758,824.

SRCS contracts for specialized transportation with **West County Transportation Agency**. The cost for contracting with WCTA for transporting students with special needs is projected to be \$9,586,358. Nearly 60% of the transportation operation of WCTA is paid by SRCS.

The following charts within this report demonstrates costs, budget, type of student and number of students for the 2024-25 school year. SRCS transportation costs and ridership has continued to increase the last years.

The increase of number of students being transported is more than the statewide average. This is costing the district to increase its contribution from the general fund to special education.

It was consistently, expressed throughout the interview process concerns regarding the SLP delivery system. It was recognized there were outstanding staff, but would benefit from administrative leadership in providing a cohesive and coherent special and language delivery system districtwide.

The district took back several classes of ESN students from SCOE which inundated some of the SLPs. Some district SLPs now has over 90 students on their caseload, and two other SLPs have over 70. All of these SLP are working very hard and are ethical members of the staff. However, they are burning the candle at both ends. Contractual negotiations should take place based on mutual respect and trust that would eliminate overages, hire more SLPs if necessary, agree on exit and eligibility process for SLPs and an adopted procedural manual for SLPS that would outline the systems, procedures, polices, roles, responsibilities and evaluation requirements for SLPs.

The caseload cap is 55 for both elementary and secondary. It is 40 at the preschool.

To address the need for a district-wide special education taskforce, the report will address how a structured approach that leverages the superintendent's expertise and engages stakeholders effectively. From reviewing the results from this special education review, regarding special education staff's frustration with lack of communication, and lack of goals, objectives and action by the special education department over the last several years, the development of a district-wide taskforce consisting of stakeholders should be initiated by the district superintendent, and co-chaired by Assistant Superintendent of Educational Services and Executive Director of Special Services. It is essential that Educational Services provides leadership with the task force, since special education students must be considered general education students first, who receive specialized support, this supported within the **2015 Report One System**.

It will be the intent of the steering committee to guide special education and provide a forum for staff to express concerns and solutions to challenges; they will have a professional forum to work with that will be mutually satisfying for all concerned.

Strategic planning study objective was added, to assist the newly appointed Executive Director of Special Services in regards to implementing the findings and recommendations of this report. Educational Services needs to collaborate as educational partners with special education services in the development and monitoring the strategic plan.

The implementation (action) plan will serve as a roadmap for the newly appointed Executive Director of Special Services and the Coordinator in developing special education systems, policies, procedures that ensure a legal, fiscally compliance, and programmatically sound special education delivery system. This action plan will enable the Executive Director to build a strong foundation for a compliant, efficient, and student-centered special education delivery system, with clear benchmarks for measuring progress and success.

Findings and Recommendations

Background and Context-Transforming Education to Improve Outcomes for Students with Disabilities

Over the past two decades, educational reform movements emphasizing accountability have heightened achievement gaps among students based on factors such as race and ethnicity, family income, language ability, and disability. Although California has made some progress in reducing inequities in educational outcomes for these student groups, students with disabilities remain among the lowest-performing sub-groups. In 2013, California convened a statewide special education task force to end persistent poor outcomes for students with disabilities, including infants, toddlers, preschoolers, students in California K-12 schools, and those up to age 22. The task force's purpose was to study the complex system for serving students with disabilities and to forward recommendations to the State Board of Education, the commission on Teacher Credentialing, and the California Department of Education (CDE). In March 2015, the task force published **One System: Reforming Education to Serve All Students, Report of California's Statewide Task Force on Special Education**, as well as an executive Summary.

The Statewide Special Education Task Force Project Summary stated:

California's current policies, including funding, credentialing, and a range of service delivery options, tend to "bolt on" special education to general education. While there are certainly examples throughout the state of well-integrated models of supports, these are the exception rather than the norm. Our prevailing model has made it acceptable, and in some instances, seem desirable, to isolate special education as a unique and separate system that parallels general education.

This project summary explained that operating special education as a separate program is contrary to current research that suggests:

Inclusive practices, integrated systems, and coherence are essential to provide high-quality, cost-effective special education programs within (rather than apart from) a well-articulated system of education.

The **2015 report on one system** identified the following seven distinct and interconnected areas of focus to improve outcome for student with disabilities:

1. Early learning
2. Evidence-based school and classroom practices
3. Educator preparation and professional learning
4. Assessment
5. Accountability
6. Family and student engagement
7. Special education financing

A predominant theme of the **2015 report on one system** was that California’s special education system would improve if one coherent system was designed in which general education and special education work together to meet the needs of all students. **The report explained:**

In a coherent system of education, all children and students with disabilities are considered general education students first; and all educators, regardless of which students they are assigned to serve, have a collective responsibility to see that all receive the education and the supports they need to maximize their development and potential, allowing them to participate meaningfully in the nation’s economy and democracy.

The project summary identified a need to transform the understanding of special education from being;

A place where students go to receive more or different services, to a viewpoint that includes special education services as one of many programs of support under the umbrella of general education.

In 2020, the California Department of Education (CDE) assigned WestEd to report on policy and system changes that have affected students with disabilities since the **2015 report on one system**. The 2021 WestEd report, California’s Progress Toward **Achieving ONE SYSTEM; Reforming Education to Serve All Students**, explains that the **2015 report on one system** was intended to create momentum and discourse in California’s efforts to reform special education. To evaluate special education reform efforts, WestEd examined the **2015 report on one system’s** seven focus areas and then made additional recommendations in each area. WestEd concluded, “Numerous improvements have been made to California’s general and special education landscapes.”

Using the 2015 report on one system and the 2021 WestEd report as guides, Santa Rosa City Schools needs to focus on coherence, inclusive practices, and integrated system to develop a comprehensive system of education to support positive outcomes for all students.

The District needs to recognize that students who receive special education services are general education students first; they must operate with the understanding that special education services are one of many systems of support under general education rather than a place where students go to receive more or different services.

These tenets are used throughout this report to analyze the District practices and how they provide inclusion of special education students in the general education programs.

To develop a change current thinking and culture within the district, based on staff interviews, it has been identified as a need to transform the understanding of special education and utilizing the **2015 Report, One System:**

A place where student go to receive more or different services, to a viewpoint that includes special education services as one of many programs of support under the umbrella of general education. **Therefore:**

Special Education is not a Place

It is a Service

District Focus, Strategic Plan

Board of Education Strategic Plan 2019-24

The SRSC district has developed a strategic plan for 2019-2024. It was consistently stated by some staff that the district does not actually have a strategic plan, but rather board stated goals and priorities. The following is the plan that has been developed for the SRCS District Board of Trustees.

Vision: SRCS will send students into the world empowered to find purpose, think critically, embrace diversity, work together, and adapt to our changing planet, and live healthy and fulfilling lives.

<p>Mission: SRCS ensures equitable access to a transformative educational experience grounded in the assets of our students, staff, and community. We nurture the whole student in an engaging, challenging, and safe environment. We recognize and value each student's individuality and our community's cultural wealth.</p> <p>Board Strategic Priorities</p>	<p>State Priorities</p>	<p>Board Values and Commitments</p>
<p>Priority 1 - Life Ready Learners</p>	<p>1,2,3,4,5,7,8</p>	<p>SRCS supports students to embrace their identities and claim their own agency in order to navigate diverse, complex and constantly changing environments by developing the following capacities: literacy, inquiry,</p>

<p>Mission: SRCS ensures equitable access to a transformative educational experience grounded in the assets of our students, staff, and community. We nurture the whole student in an engaging, challenging, and safe environment. We recognize and value each student's individuality and our community's cultural wealth.</p> <p>Board Strategic Priorities</p>	<p>State Priorities</p>	<p>Board Values and Commitments</p>
		<p>investigation, collaboration, creativity, communication, problem-solving, critical thinking, empathy, civic participation, and cultural consciousness.</p>
<p>Priority 2 - Whole Person Focus</p>	<p>2,7,4,5,6,8</p>	<p>SRCS recognizes our responsibility to develop and care for the whole person so that each is mentally, emotionally, and physically healthy. We commit to policies, practices, and relationships that help ensure each person is safe, engaged, supported, and challenged.</p>
<p>Priority 3 - High Quality Staff</p>	<p>1,2,7</p>	<p>SRCS values and supports growth-minded professionals. We commit to provide collaborative, high-quality</p>

<p>Mission: SRCS ensures equitable access to a transformative educational experience grounded in the assets of our students, staff, and community. We nurture the whole student in an engaging, challenging, and safe environment. We recognize and value each student's individuality and our community's cultural wealth.</p> <p>Board Strategic Priorities</p>	<p>State Priorities</p>	<p>Board Values and Commitments</p>
		<p>professional development to staff members so they can successfully educate and support students. SRCS commits to fairly compensating staff.</p>
<p>Priority 4 - Teaching and Learning Environment and Resources</p>	<p>1,2,5,6</p>	<p>SRCS will provide safe and clean schools. We will provide flexible learning environments that are conducive to teaching and learning. SRCS is committed to supporting teachers with current tools and training to support pedagogical leadership and innovation. SRCS believes in building a staff that reflects the students we serve.</p>
	<p>2,3,4,5,6,7</p>	<p>SRCS grounds our work in a deep understanding of</p>

<p>Mission: SRCS ensures equitable access to a transformative educational experience grounded in the assets of our students, staff, and community. We nurture the whole student in an engaging, challenging, and safe environment. We recognize and value each student's individuality and our community's cultural wealth.</p> <p>Board Strategic Priorities</p>	<p>State Priorities</p>	<p>Board Values and Commitments</p>
<p>Priority 5 - Equity and Excellence</p>		<p>students' identities and the historical and cultural contexts in which we all operate. SRCS will remove barriers and create structures that provide opportunities to further personal and academic student success. SRCS believes that student-centered, differentiated practices lead to equitable teaching and learning.</p>
<p>Priority 6 - Family Engagement and Community Partnerships</p>	<p>3,5,6</p>	<p>SRCS understands the value of engaging our students' families and our larger community. SRCS commits to providing its resources and educational opportunities to families equitably, and developing lasting partnerships with our community to deepen and expand student success.</p>

<p>Mission: SRCS ensures equitable access to a transformative educational experience grounded in the assets of our students, staff, and community. We nurture the whole student in an engaging, challenging, and safe environment. We recognize and value each student's individuality and our community's cultural wealth.</p> <p>Board Strategic Priorities</p>	<p>State Priorities</p>	<p>Board Values and Commitments</p>
<p>Priority 7 - Sustainable Funding</p>	<p>1-8</p>	<p>SRCS believes that the chronic underfunding of public education in California is unacceptable and undermines the health of our community. The current funding levels limit student outcomes and staff compensation. The SRCS Board commits to working with our community to create additional funding opportunities and to being consistent and fierce advocates for full and fair funding from the State of California.</p>

Timeline for development of the Strategic Plan:

- 02/26/14 - Approval of Strategic Plan in 2014
- 04/17/19 - First Study Session for new Strategic Plan
- 05/15/19 - Second Study Session for new Strategic Plan
- 06/19/19 - Final Study Session for new Strategic Plan
- 07/24/19 - First Presentation of the SRCS Strategic Plan 2019-24 (Version 1) to

the Board of Education

08/14/19 - Second Presentation of the SRCS Strategic Plan 2019-24 (Version 1) to the Board of Education

08/28/19 - SRCS Strategic Plan 2019-24 (Version 1) presented at Board of Education meeting for public input

09/03/19 - Strategic Plan Community Meeting (in English and Spanish) at Elsie Allen High

09/04/19 - Strategic Plan Community Meeting (in English and Spanish) at Montgomery High

09/01-30/19 - Strategic Plan online survey (in English and Spanish)

11/13/19 - Strategic Plan 2019-2024 Approved by the Board of Education

Recommendations

The SRCS Board of Trustees as directed by the District Superintendent

1. Through the leadership and direction of the district superintendent, SRCS needs to update their district strategic plan, establish a district-wide task force that includes but limited to, board member, superintendent administrative executive staff, stakeholders from throughout the district, including parents, and advocate groups that will provide input into the district mission, vision, values, and goals statements.
2. The task force will provide input for revising the district's mission, vision, values, and goals statements.
3. Within the districts strategic plan there should be a specific goal and actions addressing students with special needs as general education students first, who received specialized services, and the district serves all students in the least restrictive environment.
4. Once the strategic 5-year action plan is developed, this should be placed on the district webpages, and all staff receive on going professional development training regarding implementation of all goals and actions necessary in obtaining the goals and objectives of the strategic plan.

Special Education Department Alignment with District Goals and Direction

As determined from reviewing the districts strategic goals, vision, mission and value statements, Santa Rosa City School District is committed to working toward a district attitude and culture that provides services to the whole child.

The Special Education Department (Special Services) does not have its own mission and vision statements and has no goals that align with the District's.

The Special Education Department needs to define its vision and align its focus and professional development with the following:

1. The Governing Board's goals, concentrating special education that includes a goal of Inclusion of special education students within general education.
2. The **2015 report on One System**, with focus on coherence, inclusive practices, and integrated systems

It was stated that within the K-6 and 7-8 grade levels the District continues to struggle to get students included into general education. This means that the District utilizes a more restrictive means much earlier on with students in elementary and junior high which creates deficits that are hurdles for the student and high school staff to overcome. Staff stated that this underline current reflects the two divisions, one being elementary and the other high school, rather than a philosophical belief we are one system K-12.

The **2015 report on One System** clearly states that special education services are some of many programs of support under general education, not a place where students go to receive more or different services. The prevailing model in most California school districts, including Santa Rosa City Schools, has been to isolate special education as a unique and separate system that parallels general education.

Findings

1. The District does little to integrate its special education and general education students and has made little efforts to focus on inclusion to increase the access students in special education have to general education as recommended by **the 2015 Report One System**.

Within SRCS district Inclusion is a volunteer process, if staff elect to participate, they do so, if not, no inclusion process. The district needs to make it a priority with staff through collaboration, mutual support and trust, between administration and staff developing inclusive practices district wide.

Extensive professional development will be required for all staff.

2. The District's does not have an inclusion initiative that would assist in reducing the number of students in special education by initiating inclusive practices and systems.
3. The districts 2019-24 goal/actions within the board adopted strategic plan does not focus on supporting students who receive special education services in a general education classroom, or does it align well with the **2015 report on One System**.
4. The District's prioritization of inclusion within its aligned Governing Board's goals do not set a clear direction to better support students with disabilities in general education settings and doing so is a clear District need.

5. The district does not have systems, procedures, or policies that provides for a cohesive and coherent educational delivery system for general education or special education.

As mentioned in this report the District still does not educate enough of its preschool age or K-12 students who are in special education in general education settings. Thus, the District's current continuum of service options for students in special education strictly limit student access to general education. This is especially found with EL students not being mainstreamed that at a recommended percentage to time into the general education classroom.

The Individual with Disabilities Education Act (IDEA) set nationwide minimum standards for educational services, as well as related services, for student with disabilities, including all eligible infants, toddlers, preschoolers, children, and youths up to age 22. Each state must ensure that a free appropriate public education (FAPE) is available to any child with a disability who needs special education and related services, even if the student has not failed or been retained in a course or grade and is advancing from level to great level (Title 34, Section 300.101© of the Code of Federal regulations – CFR 300.101©). In addition, districts need to align their practice and systems with the 2015 report on ONE System and **shift mindsets so that students in special education are considered general education students who receive specialized services.**

The District needs to create District-wide strategic goals to ensure that will increase access to general education for students with disabilities.

1. Through this goal SRCS must create an Inclusive Practices Committee that reviews all aspects of special education services which includes inclusion from programmatic design for professional development necessary to support general education. This is primarily a general education responsibility.

Commendations

General education teachers **who have volunteered to** participate in co-teaching setting with special education teachers are outstanding professionals and are passionate regarding including students with disabilities into their classrooms.

Recommendations

1. The District should not be divided, (elementary vs high school) but more of a continuum of K-12 special education services.
2. To assist in developing this mindset on **One System**, the Special Services Department needs to define its vision and align its focus and professional development with the following:
 - A. Updated and revised Governing Board's goals that will include special education and inclusion
 - B. The **2015 report on One System**, with focus on coherence, inclusive practices, and integrated systems.
3. Given the District's lack of focus on inclusion and special education goals, it would

benefit the Special Education **Department to adopt a corresponding vision statement** or long-term goals that state what it wants students in special education to experience.

For example, the Special Education Department vision could be as follows:

To Support an inclusive educational experience for students with disabilities by offering specialized services, to the maximum extent possible and appropriate, in the general education setting that helps them reach their full potential and prepares them for life after high school.

4. In addition to developing a vision statement, the Special Education Department should create a strategic plan that outlines its goals, accompanying actions and milestones, and data and metrics that will be used to measure success in reach of the Governing Board's goal for special education. The District should use the department's vision and strategic plan to determine what leadership positions are needed.
5. Have the Special Education Department ensure a three to five-year strategic plan that aligns with the updated Governing Board's Goal regarding special education that would include Inclusion, and that outlines its goals, actions, milestones, and the data and metrics that will be used to measure success.
7. Emphasize and better support continuum of service options to give students in special education access to general education, with emphasis of EL students who are identified as with special education disabilities having at 80% of the time accessible to the general education classroom.
8. Prioritize supporting and expanding its volunteer co-teaching program.
9. Develop ongoing professional development for general and special education teachers, special education aides, related service providers, administrators, and other staff on evidence-based practices identified in the **2015 report on One system**, such as MTSS, and SST to better support students with disabilities in general education.
10. Expand opportunities to **all** staff in providing access to multiple professional development opportunities for general and special education teachers as well as administrators in meeting updated SRCS Board of Trustee's goals.
11. Add to the District's website in relationship to District goals:

In order to create a safe, positive school environment where all students, staff, parents/guardians, and community members are treated with respect and dignity; we must "include" everyone and welcome them into our school family. Through inclusion, students learn the power of friendship, kindness, empathy, compassion, and the strength of having a diverse community.

In addition to the above statement, adding language that strengthens the District's commitment to changing staff perceptions regarding concerns and fears regarding inclusion:

Inclusion calls us to confront the biases in our own school District as well as

practices, policies, and institutional barriers that may negatively influence student learning, perpetuate achievement gaps, and impede access to opportunities for all students. Together we eliminate disparities in educational outcomes for students from historically underserved and under-represented populations.

Special Education Student Identification Comparison

It is important for every school district to evaluate whether students are properly identified for special education and to analyze their performance and outcomes. As emphasized in the **2015 report on one system**, the responsibility for proper identification, and the performance and outcomes of students in special education are responsibilities share by both general education and special educators.

Special education should be reserved for students who are eligible for it. To be eligible for special education, a student must qualify under the two-pronged test: does the student have one of the 13 categories of disability in the Individuals with Disabilities Education Act (IDEA), and does the student require specially designed instruction.

Identifying a student for special education before implementing general education interventions does not best serve the student. Students in special education can experience stigma, less access to rigorous instruction using the general education curriculum, limited interactions with their typically developing peers, and lower expectations, which can limit their progress and outcomes.

Additionally, serving a student in special education through an individualized education program (IEP) is costlier than serving one through interventions and general education supports. Hence, proper identification only of qualifying students with disabilities for special education is essential and is influenced by a district's implementation of study teams, response to instruction and intervention, and multi-tiered system of supports.

Many district staff indicated that some students are not be exited from special education according to the two-pronged test at their three-year (triennial) IEP meeting, if they no longer qualify for special education. As stated, students experience less stigma, have increased access to rigorous instruction given in the general education curriculum, and have more interactions with their typically developing peers when they are not enrolled in special education, according to one system for all.

As stated in **One system: Reforming Education to Serve All Students, Report of California's Statewide Taskforce on Special Education**, general education students can continue to access academic and behavior interventions and supports.

Identification Rate and Cost

Identification Rate and Cost	
The District k-12 student enrollment as of Oct.	14,307
Student's identified as students w/ disabilities	2,771
% of student populations within the district with IEP's	19.37%
State wide average percentage	12.48%
Number of students over-identified as compared to the state	983
Cost to the district over identifying students	\$26,107,647
Cost per student identified	\$26,569.29

Two-Pronged Test for Special Education Eligibility

The districts special education rate is above the state average. To be eligible for special education a student must qualify under the two-pronged test: does the student have one of the 13 categories of disability as specified in the IDEA, and does the student require specially designed instruction.

During the last several years the district's overall enrollment has declined. Special education enrolment continues to increase while the overall district population is in decline.

Special Education Enrollment by Disability Category

When reviewing the identification process of students with special education it is essential, we understand that a student qualifies for special education according to the following 14 categories of disability:

- Intellectual Disability (ID)
- Hard of Hearing (HH)
- Deafness (Deaf) Hearing Impairment (HI)
- Speech or Language Impairment (SLI)
- Visual Impairment (V)
- Emotional Disturbance (ED)
- Orthopedic Impairment (OI)
- Other Health Impairment (OHI)
- Specific Learning Disability (SLD)
- Deaf-Blindness (DB)
- Multiple Disabilities (MD)
- Autism (AUT)

- Traumatic Brain Injury (TBI)
- Established Medical Disability (EMD)

Recommendations

For district consideration

1. The district needs to prioritize supporting and expanding its co-teaching program.
2. It needs to provide ongoing professional development for general and special education teachers, special education instructional assistants, related services providers, administrators, and other staff on evidence-based practices identified in the **2015 Report on One System**, such as MTSS, to better support special education students in general education.
3. Give priority to supporting and expanding the co-teaching program
4. Increase the access that students who receive special education services have to general education, with a focus on exceeding the least restrictive targets and reduce over-identifying students for special education.

Disproportionality in Special Education Identification

The National Association of School Psychology defines disproportionality as “the extent to which membership in a given group affects the probability of being placed in a specific disability category.” In other words, it is the under- or overrepresentation of a given group in special education.

Findings

From reviewing district documents and data are the following findings:

1. In Santa Rosa City Schools, English Language Learners make up 22% of students with disabilities, compared to 14% overall. 796 students district-wide identified as EL/SWD.
2. With the percentage of English learners in special education is not close to the percentage of these students in the district as a whole, the district is over-identifying English learners for special education.
3. The district does not break down its special education data to identify disproportionality based on factors such as gender, English language status, and race/ethnicity.
4. 68% of those EL students are not in the general education setting

more than 80% of their day as evidenced by CALPADS data pulled in the Disproportionality and LRE Snapshot reports.

5. Students coming from low socio-economic status
6. Lack of priority area is the implementation of Tier 1 strategies, specifically best first instruction practices in the classroom
7. Lack of engagement and discourse because of a deficit-based lens, seen in the way adults in the system talk about student abilities, outcomes, and expectations.
8. Challenges in shared curriculum use in the implementation of programs in the system, but most importantly, and to highlight again, there is a lack of cultural context alongside discourse and how that is facilitated to engage all students.
9. Results of programs vary between sites and communities. This cause variation in the types of supports offered at the fundamental Tier 1 level.
10. The lack of cohesiveness with the and across the educational system.
11. Lack of administrative support, calibrated program offering, shared language, professional development, and acceleration or support statues
12. Lack of equity audits, courses within the system that deliver below grade level standard curriculum
13. Lack of formative feedback, lack of reelection on teaching to adjust practices and how it affects leaning

Recommendations

1. Monitor annually the percentage of students who qualify for special education at least by gender, race/ethnicity, English learner status, and disability category, and provide professional development as needed on how to correctly identify student for special education.
2. Provide professional training for all staff regarding serving EL students.
3. Review EL student's placements in special education and make necessary adjustments for EL students to receive more time, with staff support (both special education and general education staff training) and training in the general education classroom
4. The district needs to develop a mechanism for tracking the number of students referred for special education and those who did not qualify.

5. The district needs to develop data on the number of students with disabilities, presently there is no data available.
6. Develop SST board adopted policy and administration regulations.
8. Develop SST procedural manual that will be used consistently throughout the district by all sites, and hold site administration accountable for use and implementation.
9. Develop master plan for MTSS that will be used consistently throughout the district. Develop site MTSS student assessment committees have all students who are function below grade level and based on teacher referral must be reviewed for necessary interventions at this level, prior to any further referrals for assessment.
10. The district needs to monitor annually for disproportionality in special education identification and provide professional development on special education identification as needed.
11. The district needs to reduce the amount of time EL students spend in special education classrooms, and provide a least restrictive environment, which is more effective for students and will meet federal compliance requirements.

Factors Contributing to the Increasing Percentage of All Students in Special Education

The increasing percentage of students enrolled in special education may be related to the special education appears to be caused by these additional factors:

- The district's lack of systematic and written procedures related to student team SST process and MTSS
- No written student exit procedures from special education
- Number of students transferring from outlying districts, the district has little input into transition of 8th graders into HS placements.
- Presently the district does not have consistent MTSS or SST procedure or policies throughout the school sites that would promote more students being served in the general education programs. Without available interventions, the students are being first referred to special education programs without necessary adjustment and intervention being made in the regular classroom, therefore, more students are being placed in special education than the statewide average.
- The district does not embrace the 2015 Report, Once System
- The number of students being placed continue to grow, which is not be

in the best interest of students and is definitely an increased cost to the district. The more special education students identified the direct cost increase to the general fund.

Student Study Team

We are including a review of SST within the scope of identification. SST is a general education process, however, within the SRCS District, it is often considered the gateway into special education, which leads to over identification based on state wide averages.

All school sites operate SST differently within SRCS District. Since the district has no cohesive written school board adopted procedures each school sites operates differently.

This does not only cause confusion and extra work by itinerant staff; it is not an effective district wide system.

The following overview serves as a reminder of the function and purpose of SST

The student study team (SST) process is a longstanding and widely-used method that gathers information from teacher's specialists and parents to provide struggling students with additional educational strategies and interventions. Either a staff member or a parent can make a referral to the program. SST meetings provide an opportunity for all parties to voice concerns and develop a plan. The interventions agreed upon will vary depending on the child's educational needs. The process has proven to be successful if consistently implemented. When properly employed, these meetings can be effective in mitigating referrals, but more importantly, in designing strategies for parents, teachers, and ancillary school personnel to assist students experiencing difficulty to improve performance. These teams typically include parents, teachers, school administrators, counselors and the student (at the middle school level and beyond). The objective is for people to work together across traditional boundaries to identify the students' strengths and assets to build an improvement plan based on the dynamic skills and perspectives of the participants.

The SST should design and implement instructional and behavioral strategies, providing practical support through the involvement of all team members. The SST should offer consistent follow-up and evaluation, with regularly scheduled meetings, examining prior decisions that build further plans based on accumulated data and analysis. Under the best conditions, the district SST should function as a strategic service before a formal referral for special education evaluation is considered. The intervention sequence prior to the consideration for possible special education eligibility should follow these steps:

1. The classroom teacher attempts a documented series of unsuccessful Interventions.
2. The team designs another set of proposed intervening measures.
3. The student is referred for special education assessment only after documented measures have been consistently implemented and thoroughly evaluated.

The district has no board policies or administrative regulations on SSTs. It lacks a manual that can be used as a reference across the district. During interviews, employees indicated numerous times that ongoing staff development in this area as well as consistent policies and procedures would be helpful.

Some district staff stated that sites do not have strong a MTSS implementation process; therefore, have a higher rate of assessment and referrals. Students from these sites who may qualify under specific learning disability (SLD) may not have qualified if they received reading or math interventions.

Serving a student with an individualized education program (IEP) is more expensive than using intervention and general education supports. Identifying a student for special education before general education interventions are considered is illegal under IDEA 2004 and not in student's best interest. It is essential the district adopt a districtwide process through the leadership team. The stakeholders should have input in the developing the process and procedures, and the principals should review and agree with district administration on the school sites' role and functions. The final district adopted SST process should reflect a districtwide process and system that all school sites follow.

Commendation

The district school sites individually offer SST processes led by the Special Education/Student Services Department. Each school site recognizes the importance of SSTs and assisting students in the general education classroom settings. Although SSTs are conducted at local school sites, there is no process that provides for consistent implementation districtwide. The staff is commended for realizing the important role SST can play in determining interventions for struggling students.

Recommendations

The district should consider:

1. Educational Services taking the lead in developing consistent procedures and policies districtwide for the development and implementation of SSTs. **It is noted this is not a special education responsibility.**

This is not an activity that is led by special education staff, but rather a general education process, to assure All student processing learning problems in the general education classroom are being served in the least restrictive environment.

2. Develop a districtwide Board SST policy and submit it to the governing board for adoption. CSBA has a model policy.

The school board of trustees through the leadership of the superintendent should update a current policy, the administration develop a current and effective handbook outlining: The Purpose, Roles, Forms, Process to implement and Professional Development for all staff.

3. Develop administrative regulations for the implementation of SST policy.

4. Develop a handbook (manual) including policy, procedures and forms that will be distributed districtwide. The goal is for all school sites to have a consistent manual that is used throughout the district. The referral should be submitted digitally.
5. Solicit input from all school site principals (and other district staff stakeholders) in developing districtwide SST process and procedural manual. A district wide steering committee comprised of stakeholders should be developed and assist in the development and process on how the SST handbook will be effectively implemented.
6. Once the SST policy and procedural manual is adopted, provide school-site staff with training in the SST model. This should be ongoing throughout the year, at least annually.
7. Ongoing training for the staff responsible for chairing SST and this should be a special education staff member, SST is a general education responsibility and function.
8. Require all general education teachers to utilize the SST model to assist in meeting students' needs prior to referring to special education for assessment.
9. Provide teachers with training in behavior management prior to SST referrals, if the student they may be referring has behavior issues.
10. Assure to use Positive Behavior Interventions and Supports (PBIS) prior to referral to special education.
11. Ensure that a comprehensive formal training on the SST process, guideline and handbook is provided to all staff member in the district.
12. Educational Services should ensure that there is consistency with efficiency and effectiveness with the intervention provide district-wide.
13. Ensure through Educational Services Leadership that there is consistency across the district with the intervention methods that are implemented.
14. Develop systems to monitor the referral rate and track the rate of unqualified for special education.
15. Develop systems to analyze the exit rates for all students leaving special education.

In addition to the above recommendations and to assist the district in clarifying the role of SST within general education and help prevent over-identification for special education, here are some strategies will be helpful, for the district to consider:

- 1. Define Clear SST Guidelines and Objectives:**

- Establish SST as a problem-solving process to support students within general education rather than as a referral step to special education.
 - Develop guidelines that outline specific, targeted interventions to address a student's needs and monitor progress before considering special education referral.
2. **Strengthen Early Intervention and Support Options:**
 - Expand access to general education interventions, like tutoring, behavioral supports, and counseling services, to provide help within the general education setting.
 - Train general education teachers on differentiated instruction and classroom accommodations to meet diverse learning needs effectively.
 3. **Data-Driven Decision-Making:**
 - Use data to track student progress during SST interventions, and set criteria for when additional interventions should be tried versus when a special education referral might be appropriate.
 - Implement regular reviews to assess if students are being referred to special education without sufficient general education intervention.
 4. **Provide Professional Development for Staff:**
 - Train SST team members and educators on the distinction between learning differences and disabilities to prevent misunderstandings.
 - Emphasize professional development on multi-tiered systems of support (MTSS) to better address academic and behavioral issues within general education.
 5. **Increase Family Engagement and Communication:**
 - Educate families about the SST process as a general education support tool, not a pathway to special education.
 - Involve parents in discussions to ensure they understand the interventions being provided and the intended outcomes, reducing pressure to pursue special education as the only option.
 6. **Regularly Review SST and Referral Data:**
 - Analyze SST referral trends to identify patterns in over-identification and make adjustments as needed.
 - Compare district referral rates to state averages to continuously evaluate the effectiveness of the SST process in supporting general education outcomes.

These strategies can help the SRCS District realign the SST process within general education and reduce unnecessary referrals to special education by addressing students' needs early and effectively

Teacher Staffing Ratios, Class Size, and Caseloads

The district organized the delivery system with RSP and (mild/moderate) SDC settings and some push-in model programs. Staff interviews indicated that there is no standardized system for consistent procedures to be implemented districtwide.

The district contacts with Sonoma County Office of Education for county operated classes to be located on SRCS campus with district students.

46 County Operated Classes

\$104,000. Average cost per student in SCOE Programs

Number of students: District will supply data

The district should conduct an analysis (study) to determine in the next 2-3 years, the benefits for the district to operate these programs, determine the pros and cons, cost, and benefit for district students to be served by district staff.

A written process should be implemented so that when problems arise, the district can respond with consistent processes. Some staff stated that the district is reactive and not proactive in solving problems.

The teaching staff is unclear about how decisions are made in transferring student from an RSP to an SDC or vice-versa. Several interviewees indicated the district needs a more effective system to communicate with parents since they do not know the process or when a change in placement is made.

The district has the following categories of identification of special education programs:

RSP

SDC

Educational Specialist: Blended caseload of RSP and SDC

More intensive programs:

ESN - Extensive Support Needs, students significantly impacted, take alternate assessment etc.

CEP - Counseling Enriched Program (students who are Emotionally Disabled, etc.)

RISE - Students with higher functioning Autism

	RSP Teachers	# RSP Students	SDC Teachers	# SDC Students	Educ. Spec. Teachers (serving a blend of RSP/SDC)	# Students Served by Blend Teachers	ESN Teachers	# ESN Students	CEP Teachers	# CEP Students	RISE Teachers	# Rise Students
Preschool	0	0	0	0	0	0	7	47	0	0	0	0
Elementary	13	307	9	110	1	20	12	102	0	0	4	39
Middle School	2	39	3	45	16	251	6	47	1	7	2	17
High School	24.6	564	13	179	11	221	8	81	6	57	2	21
18-22 Transition	0	0	0	0	0	0	6	60	0	0	0	0
District Goals	39.6	910	25	334	28	492	39	337	7	64	8	77

Recommendations

For the district to consider

1. A best practice is for special education administrators to establish objective staffing criteria and monitor the following data monthly as follows:
2. Develop caseload and class sizes for all service providers and teachers using a carefully maintained database. This should include lists by school, service delivery option and teacher, to be provided to special education staff and school site principals.
3. Review the number of assistants, especially when new staff is added.

Resource Specialist Program

Interviewees described the district's special education service delivery model as where most students in special education are served in special programs but mainstreamed to the maximum extent possible. Some specialized academic instruction is provided through push-in support, pull-out, and co-teaching using RSP teachers. Elementary schools are staffed with full-time resource specialists. Education Code:

56362(c) states:

“Caseloads for resource specialist shall be stated in the local policies developed pursuant to Section 56195.8 and in accordance with regulations established by the board. No resource specialist shall have a caseload which exceeds 28 pupils.”

At the time of visit, based on caseload estimates provided by the district, there were no special education teachers in the resource specialist programs that were over the caseload maximum as shown below:

Resource Specialist Instructional Support

Education code and industry standard is 30 hours per week of IA support for RSP and/or 80% minimum IA time assigned to RSP

The district should consider

1. Develop and implement caseload criteria for RSP teachers and instructional assistants based on the Education Code.
2. Ensure all caseloads are at full capacity before adding programs.

Special Day Class Program

Mild to Moderate Special Day Class (SDC)

The Education Code does not include maximum caseloads for mild to moderate SDCs; however, industry standards have been developed as caseload guidelines. Traditionally, the students receiving services in this program require direct instruction for more than 50% of the day, although this is not an education code requirement.

Usually, SDC has 2 paraprofessionals assigned as needed. A 1:1 paraprofessional may be added depending on student needs as identified by the IEP, through the SCIA process. The district provides the following classes and caseloads for SDC, with the understanding the industry standard average for caseload is 1 teacher to 12-15 students.

There is no education code requiring a caseload limit or maximum. Students supported in this class usually follow the core curriculum with modifications and supplemental work.

Staffing Allocations of Special Education Assistants

Throughout California, the number of districts utilizing instructional assistants, 1-to-1, and special circumstance instructional assistants has increased dramatically over the past few years. This has affected special education budgets and contributions from the unrestricted general fund, especially in situations where the services are not warranted or monitored and create a sense of dependence. One strategy for a district to determine if these services are appropriate is to implement policies, procedures, and guidelines while strictly monitoring these services to prevent them from being provided unnecessarily.

The number of 1-to-1 instructional assistants should continue to be monitored since the goal should be to foster student independence not dependence.

The district has no written Guidelines/Procedures for Requesting an Independence Assistants (IA) that are used by SCOE. These guidelines do not cover mentoring or a fading process for the instructional assistant. Most staff, principals, teachers, and support staff are not aware of the document and stated in most cases it is not used at IEP meetings.

The district does not consistently use policies or procedures for assigning, supporting, fading, or dismissing instructional assistants, including one-on-one instructional assistant services.

The SELPA provides the district with an instructional assistant policy, but some staff reported this document is online, is not referred to by most staff and does not cover the fading process.

Lack of policy and procedures increases the potential for adversarial IEPs because when a 1-to-1 instructional assistant is requested or recommended, the district lacks a structure to guide the process for decision-making. When the determination is made that a 1-to-1 instructional assistant is appropriate, the IEP team does not include a fading or exit plan for these services.

It was stated in interviews, because of the lack of policy and procedures, teachers are unclear about when they can decline a request for a 1-to-1 instructional assistant. The Special Services Department does not re-evaluate to determine if such an assistant is still needed for the student to benefit from education.

Contracted Special Education Assistant	
ADEP Interpreting	4
Amergis	17
Emerald	21
EP Behavior Consulting	9
Inspire	120
PBS	6
Redwood Pediatric	4
RO Health	2
Soliant	2
The Nature of Interpreting	5
Total Contracted with Outside Agencies	190

However, it is noted the district does not have very many one-to-one assistants, the vast majority are classroom assistants. The issue is whether the district is overstaffed with classroom assistants. The district contract states that TK, K, 1 SDC classes must be at a one adult to two student's ratio, which is generally too low a ration and very costly.

The establishment of policies and procedures provides an opportunity to clearly define the role of the special education Executive Director, special education staff, and school site administrators.

Guidelines can assist district staff members when they are challenged by parents and advocates who request these services and promote a student-centered focus at IEP meetings. Extensive training and strategies must follow the development and implementation guidelines. Administrators, general education staff, and special education staff should attend mandatory training on the usage of the guidelines.

Current Special Education Assistants at SRCS as presented by District Data	
Behaviors Assistant	13
Enhanced Special Education Assistant	1
License Vocational Nurse-Instructional Assistant	1
Special Education Assistant	31
Special Education Assistant Severely Handicapped (ESN)	36
Special Education Assistant, DHH	9
Total Number of District Employed	91

TOTAL SPECIAL EDUCATION ASSISTANTS - 281

It was stated throughout interviews, SRCS contracts with outside agencies for a significant number of special education assistants; the following reasons including; but not limited to:

1. District cannot fill vacancies with district employed staff, therefore contracts with outside agencies
2. Due to lower salary schedule for district instructional assistants, they are hired by contracted agencies for higher pay
3. District pays nearly \$50 per hour for contracted instructional assistants, which is significantly higher than district pay.

Recommendations

1. The district should consider negotiating with district classified bargaining union in good faith to make necessary adjustments in the contract that would assist the district in employing their own instructional assistants, instead of relying on contracted staff.

This should be done through mutual respect and trust between administration, staff, and the bargaining unit, with common ground for all concerned in doing what is best for students and is fiscally responsible.
2. There are several benefits of the district employed staff vs contracted staff, it is recommended the district present the following positions to the bargaining unit for collaborative and respectful negotiations.
 - * Staff feel part of the district when employed by the district
 - * Staff feel more ownership and feel more valued when working for the district, instead a contracted employee.
 - * It should be a cost saving to the district by hiring district instructional assistants, instead of contracting with outside agencies, when possible.
 - * The district has more control of personnel hired by the district rather than contracting with staff, who are employed by outside agencies.
3. District should develop policy and procedure that are adopted regarding 1:1 instructional assistants.
4. Review of all instructional assistant placements should be conducted, with the goal of utilizing these resources more effectively. This should include the following components:
Number of the assignment of instructional assistants to classrooms.
5. Identify need for 1-to-1 instructional assistant assignments within a step-by step structured process.

6. Identify Alternatives to 1-to-1 instructional assistants.
7. Determination of whether existing resources are being utilized.
8. Evaluation of the continuing need for 1-to-1 instructional aides.
9. Determination of when it is appropriate to add hours to an existing instructional assistant's schedule.
10. Measurable outcomes.
11. Dependence factors.
12. Fading procedures.

Many districts use the term special circumstance instructional assistant (SCIA), instead of 1-to-1 instructional assistant to indicate that an assignment is temporary and should be faded after a predetermined period of time. Fading is an important aspect of these services and is crucial to encouraging independence.

Most staff members who were interviewed indicated this system of evaluation and placement are not utilized in the district. An instructional assistant is often hired to assist the teacher with a student's behavior.

In ESP's opinion the district does over staff special education assistants, due to contract language. It is recommended this be renegotiated to reflect staffing ratios in more accordance with statewide guidelines and standards.

Commendation

The district works diligently to process requests for hiring instructional assistants. It was stated by staff they realize hiring an IA must be justified. Staff indicated that they would prefer working with district employed special education assistants, because they would be less turn over and assistants would take more ownerships with the district.

Recommendations

The district should consider:

1. Develop district policy and procedure for the use of SCIA's rather than 1-to-1 instructional assistants along with general instructional assistant guidelines.
2. Develop a policy and procedures to assist with assigning, supporting, fading, and dismissing 1-to-1 instructional assistant services.
3. Develop a policy and procedures to include the establishment of monitoring and fading plans at IEP meetings.
4. Provide mandatory training to special education staff and school site Administrators on the policy and procedure for determining the need for 1-to-

- 1 instructional assistants (SCIAs).
5. Closely monitor the assignment of 1-to-1 instructional assistants and the placement of the student they are assigned at the school site.
 6. Evaluate the continuing need for 1-to-1 instructional assistants. Identify specific staff members to be responsible for analyzing 1-to-1 usage and student needs. Clearly define roles of the special education directors, special education staff, and school site staff in this regard.
 7. Ensure that the placement of 1-to-1 instructional assistants is a good fit for the student and staff.
 8. Ensure a fading policy is adopted when deciding at the IEP meeting whether an instructional assistant is required.
 9. Have the superintendent's cabinet review additional staffing requests or additional hours regarding instructional assistants.
 10. Provide training for all instructional assistants in understanding their roles, responsibilities, confidentiality and how to effectively manage behavioral disruptive students.
 11. Develop a **Special Education Instructional Assistant Recourse Guide (instructional assistant procedural manual) that should include; but not be limited to the following:**
 - Professionalism
 - Instructional assistant expectations
 - Role of classroom teacher
 - Role of teachers and instructional assistants
 - Effective communication
 - Accommodation modifications
 - Instruction and progress monitoring
 - Independence
 - Confidentially
 - Instructional strategies for specific learning disabilities

General Fund Contribution to Special Education

The district requested a review of its unrestricted general fund contribution to special education. Most school districts need to make contributions from their unrestricted general fund to special education to sustain these programs as required, but when the amount of contribution is excessive, it becomes a concern.

The district does an outstanding budgeting and monitoring special education expenditures and incomes. The percentage of contribution from the general fund to balance special education is below the statewide average. However, the newly appointed Executive Director of Special Education/Student Services should meet regularly with Business Services to assist and monitor budget development.

The Code of Federal Regulations defines excess costs as follows:

Excess cost means those costs that are in excess of the average manual per student expenditure in a LEA (local educational agency) during the preceding school year for an elementary or secondary school student, as may be appropriate. (34 CFR 300.16),

Excess special education costs that require a contribution from a district's unrestricted general fund (also known as encroachment) begin to accrue only after the costs of educating special education students exceed the district's proportionate share of the average per-pupil expenditures. Therefore, a school district's local general fund is required to pay its share of the cost of special education first.

The Legislative Analyst's Report dated January 3, 2019 states, "a combination of increasing special education costs and relatively flat state and federal special education funding has resulted in local budgets covering an increasing share of these costs."

The report also states the following:

Districts have little control over special education revenues. California distributes funds to special education local plan areas (SELPA's) based on their member districts total average daily attendance (ADA), not on identified special education students.

The reporting methods of districts, county offices, and SELPA's can vary. Some districts include transportation, while others do not and there are variations in how special education funds are allocated through a SELPA's approved allocation plans. Therefore, it is not always possible to accurately compare a district's general fund contribution to that of other districts. However, a district may need to address a general fund contribution that is excessive or increasing.

Maintenance of effort (MOE) is the federal statutory requirement that a district must spend the same amount of state and local money on special education each year, with limited exceptions. In considering how to reduce the overall general fund contribution, the district is required to follow the guidelines in the MOE document (20 U.S.C.1413 (a) (2) (A)). The MOE document from the CDE lists the following as exceptions that allow the district to reduce the amount of state and local funds spent on special education:

The voluntary departure, by retirement or otherwise, or departure for just cause, of special education or related services, personnel, who are replaced by qualified, lower-salaried staff.

1. A decrease in the enrollment of children with disabilities.
2. The termination of the obligation of the agency to provide a program of special education to a particular child with a disability that is an exceptionally costly program, as determined by the State Educational Agency, because the child:
 - a. Child has left the jurisdiction of the agency; or
 - b. Child has as reached the age at which the obligation of the agency to provide FAPE (free and appropriate public education) to the child has terminated; or
 - c. No longer needs the program of special education

Special Education Budget 2024-25

Special education budget	\$73,623,500.00

General Fund Contribution

2024-25 Contribution from general fund	\$41,939,351.00
Actual contribution from general fund	

The district’s general fund contribution is projected to be \$41,939,351.00 or about 56.96% of the special education budget not including transportation and NPS/NPA services, which would increase the overall support from the general fund. About 38% of the special education funding comes from AB 602.

According to the March 2019 California Special Education Task Force Report on the General Fund Contribution Percentage to Special Education, the statewide average was 43%. However, the Legislative Analyst’s Office 2018-19 Budget: Proposition 98 Education Analysis dated February 9, 2019 states that as of 2018-19 “state and federal categorical funding covers about 40% of special education costs in California. Schools cover remaining special education costs with unrestricted funding (mostly) LCFF.”

This indicates that the unrestricted general fund contribution has increased to approximately 64%.

The statewide average of 64.3% as calculated by School Services of California for the 2024 school year, is the average of school districts contribution, from the general fund to special education budget operations.

SRCS is commended for being below the state wide average of general contribution. The district contributes 56.96% of general fund to balance the special education budget projected for 2024-25 school year.

State special education funding is meant to pay the additional costs of serving students with disabilities. The California Legislative Analyst’s Office (LAO) estimates that

education for students with disabilities cost on average more than twice as much as educating general education students.

Three main sources finance California special education service are as follows:

Federal government	9 %
State	29 %
Local school districts	62 %

Again, several factors affect a district's general fund contribution, including revenue received to operate the programs and the expenditures for salaries, increase of STRS and PERS benefits, staffing and caseloads, nonpublic school and nonpublic agency costs. Litigation can also increase the contribution.

The district provides special education transportation as a related service. No statewide data provides an accurate average for the percentage of students with IEPs transported as a related service. A review of studies has suggested that districts that manage their IEP process well transport approximately 10% - 12% of their students with IEPs. The district transports a very high number of students with IEPs compared to the statewide average.

Commendations

The overall contribution from the general fund to balance the special education budget is below industry standards. The district is commended for meeting student IEP needs at a cost-efficient manner.

The Associate Superintendent of Business Services works well with other department heads in developing budgets that are reflective of meeting all student needs in the district. The district does an excellent job in monitoring costs and expenditures on an ongoing basis.

Recommendations

The district should consider:

1. Monitor the district's general fund contribution through the annual MOE and determine if the district can reduce expenditures using any of the exemptions allowed.
2. Develop monthly meetings with itemized agenda between the Assistant Superintendent Business, Special Education/Student services and fiscal support staff responsible for the special education budget that include the following topics:
 - a. Budget development
 - b. Budget monitoring
 - c. Maintenance of effort requirements
 - d. Additional staff requests or change in assignments
 - e. Nonpublic school and/or agency contacts and invoices and new placements
 - f. Due process or complaint issues
 - g. Number of students being transported
 - h. Staff caseload
 - i. Identified student counts
3. Assign the Special Education, Business, and Human Resources departments to meet together and review all of the staffing and assignments through this process, including contracted positions.
4. Assign staff to review how positions are used and charged to the district budget.

ADA Attendance Percentage of the district

A source of income and increase services to students

As the district prepares for the 2024-25 school year, and the next two years in working to balance the budgets and reduce deficient spending, one review to promote increase in funding is to increase the average attendance rates.

Using 2023-24 as a baseline, the district enrollment was 12,853 and the actual ADA was 11,747.70, which is a ratio of district ADA to Enrolment of 91.40%. If the in 2023-24 if the district would have increased the ADA ratio anywhere between 1-5% the financial benefit to the district could be a following:

1% would additional LCFF revenue of	\$1,151,765
2%	\$2,303,530.
3%	\$3,455,295
4%	\$4,607,059
5%	\$5,758.824

In addition, 22% of the students are chronic absent. These students do not attend school on any regular bases, therefore not only a fiscal deficit for the district, but more importantly the students are not attending school, not learning, and not benefiting from the school offerings to become a productive citizen in the community. Further review should take in this finding.

Recommendation

1. The Department of Wellness and Engagement should develop a system that continues to address enrolment and attendance that increases the ADA by 1% for each year, the next 5 years.

Specialized Transportation

In the 2013-14 school year, California adopted the LCFF, and school transportation has been funded at the same level as the prior year appropriation.

In addition, the funding was structured as an add-on to the base grant received by each district. It can be utilized only on school transportation, and districts need to spend at least as much as they receive to maintain the same level of funding.

On a statewide average basis, California provides approximately 35% of the funding necessary for school transportation based on school districts' reported approved costs. Therefore, a majority of funding to operate transportation is funded out of the general fund.

SRCS contracts for specialized transportation with **West County Transportation Agency (WCTA)**. The cost for contracting with WCTA for transporting students with special needs is

projected to be \$9,586,358. Nearly 60% of the transportation operation of WCTA is paid by SRCS.

The following charts demonstrates costs, budget, type of student and number of students for the 2024-25 school year. SRCS transportation costs and ridership has continued to increase the last years as demonstrated on charts below.

The increase of number of students being transported is more than the statewide average. This costing the district to increase its contribution from the general fund to special education by more than \$3,000,000.

Routes and Staffing / Special Needs Ridership for 2024-2025

Routes and Staffing for 2024-2025		
RT Type	# Routes	Uncovered
SPED Ambulatory	49	3
SPED W/C	13	3
SPED Van	22	2
Gen Ed	35	4
Total RT	119	12
Standby Driver	20	
Total Et al.	139	12
Special Needs Ridership		
926 – School Year 2022-23 (485 SRCS)		
929 – School Year 2023-24 (535 SRCS)		
965 – October 2024 (562 SRCS)		

WCTA & SRCS Student Comparison

WCTA & SRCS Student Comparison			
Route Type	WCTA Total	SRCS	Current % of Use
General Ed Routes	35	17	42.1%
SPED Students	965	562	58.3%

Budget Information

Budget Information					
Year	% of Use	Gen Ed Budget	% of Use	SPED Budget	Total
2022-23	42%	\$1,764,712	58%	\$5,870,251	\$7,634,963
2023-24	42.5%	\$2,229,962	57%	\$6,886,374	\$9,116,336
2024-25	42.1%	\$2,280,499	59%	\$7,3054,859	\$9,586,358

The business office needs to continue to update information on a consistent basis regarding the number of students whose parents provide their own transportation, those special education students using general education transportation and those who require special education transportation. Both departments should develop an ongoing system for updated information between departments.

Transportation has excess costs which have an additional impact on the encroachment of special education to the general fund so efficient communication streams on these issues are very important.

The district provides special education transportation as a related service. No statewide data provides an accurate average for the percentage of students with IEPs transported as a related service. A review of studies has suggested that districts that manage their IEP process well transport approximately 10% of their students with IEPs. The district transports students with IEPs. 20% of the students in the district with IEP's are receiving specialized transportation.

Regarding the transportation costs, the district is budging \$9,586,358 for specialized transportation for special education. The district cost per student is about \$10,000 which is the statewide average cost per child receiving transportation.

If the district could work toward serving about 10% of the population of students with IEP through specialized transportation and assure the students educational needs are fully meet.

The district is commended for keeping cost per child in special education and cost of specialized transportation close to industry standards.

The decision-making process that defines eligible transportation for students with disabilities is also important. The district should review its current procedures for determining eligibility, how the need is established in the IEP etc.

Many districts use a decision tree to assist IEP teams in establishing transportation needs. In addition, the use of a transportation form can be an excellent way of refining communication between departments regarding student transportation needs.

Transportation costs

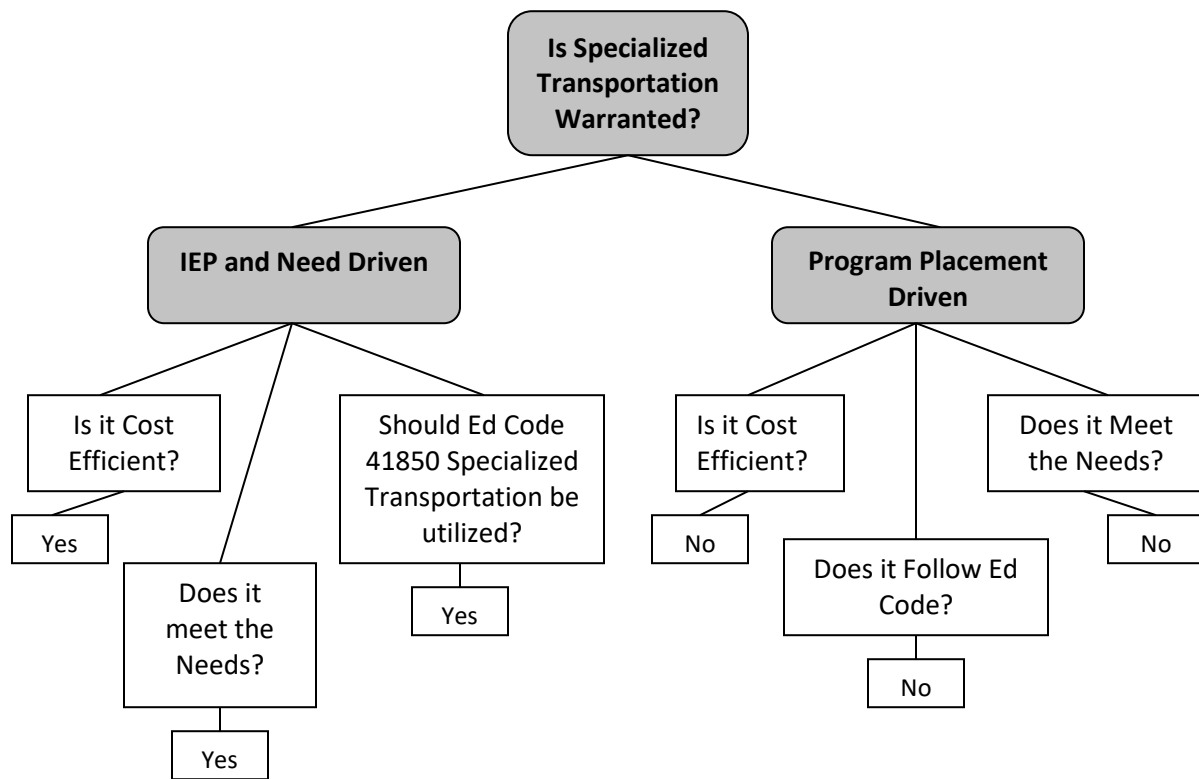
Budget	Actual	Budget for 2024-25
2023-24	2023-24	
\$6,697,943.20	\$6,731,517,517.02	\$9,586,358

The districts reimbursement for 2023-224 \$3,826,017

The district must assure they have a policy and system in place in determining student’s quality for specialized transportation. Due to the support of the general fund, it is costing the district significantly to transport a large number of students.

The following sample of a Specialized Transportation Decision Tree Process that could be used by SRCS to determine whether a student requires transportation as a related service, part of the IEP.

Sample Decision Tree



Sample Transportation Form to be completed at the IEP Transportation Requirements Assessment

IMPORTANT: ALL INFORMATION CONTAINED ON THIS FORM IS STRICTLY CONFIDENTIAL. DISCLOSING THIS INFORMATION TO ANY PARTY NOT DIRECTLY RESPONSIBLE FOR THE SAFETY AND WELFARE OF THE CHILD IS A VIOLATION OF STATE AND FEDERAL LAW.

Child's Name: _____ Student ID: _____

_____ School: _____

Grade: _____ Date: _____ 1. Disability

1. 1a. what is the child's disability?

2. 1b. yes No Are there specific IEP goals for the child's bus ride?

3. 1c. If yes, what are they?

2. Behavior and Supervision on the Bus Ride

1. 2a. Yes No can the child be safely included on a bus with typical children?

2.

3. 2b. Yes No Does child exhibit behavior aggressive or potentially dangerous to self/others?

4. 2c. Yes No Are there specific "triggers" or situations known to provide the child?

1. 2d. If yes, what are they?

2.

3. 2e. Yes No Is there a behavioral intervention plan in place for the child? (attach copy if yes)

4. 2f. Yes No Does the child require additional adult supervision on the bus besides the driver?

5. 2g. If an attendant is required, is specialized training needed? (circle any topics that apply)
6. Violence prevention training Epi-Pen training CPR certification
7. Other specialized training (describe):

8. 2h. yes No Does the child require an individualized, one-on-one attendant during bus rides?

3. Vehicle and Equipment Needs

1. 3a. Yes No Can the child use the vehicle stairs to enter and exit the bus?
2. 3b. Does child use braces, a walker, manual wheelchair, or power wheelchair? (If yes, circle which)
3. 3c. If child uses a wheelchair, indicate dimensions and any special features (e.g., tilt-in-space, etc.):
4. Width: _____(in inches) Length: _____ (in inches) Special features:

4. 3d. Yes No If child's wheelchair has a lap tray, may it be safely removed during the bus ride?
5. 3e. Yes No Can the child be safely transported to a school bus seat for the bus ride?

If yes, are special restraints required?

_____ If yes, what assistance is required? _____ How much does the child weigh?

4. Medical Concerns

1. 4a. Yes No Does the child have a potentially life-threatening condition or illness that requires monitoring, evaluation, and possible intervention by a

nurse or other medical professional during the bus ride? If yes, what is the condition or illness? _____

2. 4b. Yes No Does the child use assistive devices or medical technology such as tracheotomy or feeding tubes, ventilator, oxygen, suctioning devices, or wear a helmet or other protective gear? If yes, describe the device or technology required:

3. 4c. Yes No Does the child experience uncontrolled seizures, severe hypotonic resulting in constricted airway, or apnea? If yes, circle which and attach medical assessment.

4. 4d. Yes No Will the bus staff be expected to perform any medical procedure or operate any medical equipment during the bus ride? If yes, what procedures or equipment? _____

5. 4e. Yes No Does the child experience severe allergic reactions? If yes, allergic to what?

6. 4f1. Yes No Does the child carry an "Epi-Pen?"

7. 4f2. Yes No If yes, is the child trained in how to self-administer the Epi-Pen?

8. 4g1. Yes No Does the child require medication to be transported on the bus? If yes, specify type(s) of medication and the amount(s) to be transported: _____

9. 4g2. If yes, must the medication be available for the child to use during the bus ride, or is the medication only to be transported between home and school? _____

10. 4g3. If yes, must the medication be available for the child to use during other activities/field trips requiring transportation? _____

11. 4h. Yes No In an emergency, could the child safely be lifted and carried off the bus?
12. 4i. Yes No Is an Out-of-Hospital "Do Not Resuscitate" Order in effect for the child?
13. 4j. Yes No Does the child's medical condition require any other special adaptations or restrictions to the bus environment? (e.g., temperature, light, noise, duration of ride, etc.) If yes, what adaptations or restrictions?

5. Special Transportation Concerns

1. 5a. Yes No Can the child be safely picked up and dropped off at a group bus stop?
2. 5b. Yes No Must a designated adult be present to accept custody of the child when dropped off at the bus stop and/or home?
3. 5c. Yes No Does the child require any special seating arrangements (e.g., position on the bus ride)? If yes, what are they?

4. 5d. Yes No Does the child need a child safety restraint system (e.g., car seat, safety vest, etc.) on the bus ride? If yes, what?

5. 5e. Yes No Does the child require an assistance animal during the bus ride?
6. 5f. Yes No Does the child require any special communication techniques (e.g., sign language, sign board, facilitative communication board, etc.)? If yes, what are they?

7. 5g. Yes No Are there any other special concerns that the bus driver, attendant or other transportation staff should know to ensure the safety and welfare of the child during the bus ride? If yes, what are they?

6. Emergency Contacts.

List the names, relationship (i.e., parent, neighbor, physician, etc.) and phone numbers of all emergency contacts for the child.

Information provided by:

Print name: _____ Signature: _____
_____ Date: _____

Information received by:

Print name: _____ Signature: _____
_____ Date: _____

Recommendations

1. Continue communication between the special education, WCTA and business office. Monthly meetings should take place with an agenda and minutes. Any additional staff needing to be hired such as 1 - 1 aides, that are not budgeted for should be discussed prior to approval of hiring. The utilization of existing instructional aides should be done prior to hiring any additional staff.
2. Share print outs of budgets with site administration.
3. Due the continued increase each year of fiscal impact on the general education budget regarding special education, the superintendent should consider conducting weekly meetings with an agenda that reviews status updates including, but not limited to the following: due process, budget, personnel, hiring and recruitment, high cost of services to pupils, special education transportation status, and SELPA policies, procedures, NPA costs, and funding allocation model.
4. Begin the process to analyze and examine the necessary steps and timelines to consider taking back special education programs from the county office. Necessary communication and procedures need to be followed in working with the SELPA and COE in reviewing the feasibility of this transfer of programs. This could provide for more effective program delivery and cost savings to the district.
5. Consider developing a district task force directed by the superintendent to identify district student needs regarding who are being transported, and costs.
6. Explore options for an in-depth study of transportation services for special education students to determine necessary efficiencies to reduce excess costs.
7. Review the procedures within the IEP process for determining which students are eligible for transportation, **determine if a decision tree is being used to determine the need in an IEP**, determine the degree to which students are provided door to door transportation and whether it is required in the IEP.
8. Ensure IEP teams are trained to appropriately assess the need for student transportation as a necessary related service using a decision tree for consistency in evaluating the need for service.

9. Review and/or revise the decision tree to identify special education students for transportation as a necessary related service.
10. Consider consolidating the decision makers through the IEP process for determining transportation support, or ensure that program managers or administrators are present for the IEP when a new special education student enters the district, and when students transition to another school (e.g., elementary to middle school and middle school to high school).
11. Evaluate the high percentage of bus monitors and aides on special education routes to reduce the overall number of aides through increased staff training in behavior support.
12. Increase the participation WCTA transportation staff in necessary IEP meetings to appropriately identify transportation support and ensure that it is applied in the LRE.
13. Implement a strategy to communicate with parents as to whether their student(s) will attend ESY and whether they wish to participate in transportation services if they are identified for such.
14. Immediately begin collapsing summer routing one week after ESY starts to ensure the greatest route efficiency and cost savings.
15. Enhance the communication and data exchange between the special education and transportation programs to ensure accurate and timely student information data for safe transportation scheduling.
16. Attempt to reduce the number of students receiving specialized transportation services and provide the least restrictive environment in meeting the student's educational needs.
17. Monitor transportation costs and expenditures between the transportation department, business and special education departments.

Extended School Year Services for Students with Disabilities

Extended School Year (ESY) services is an individualized instructional program for eligible students with disabilities that is provided beyond the regular school year. **The need for ESY services must be determined on an individual basis by the admission, review, and dismissal (ARD) committee.** The individualized education program (IEP) developed for ESY must include goals and objectives. It was stated by staff there is criteria form, but is not used consistently. Staff interviewed were unaware of an ARD Committee.

The need for ESY services must be documented from formal or informal evaluations provided by the district or the parents. If a student requires a significant amount of time to recoup acquired critical skills,

ARD committee must discuss whether the student needs extended educational or related services during school breaks. If the loss of acquired critical skills would be particularly severe or substantial, or if such loss results or reasonably may be expected to result, in immediate physical harm to the student or to others, ESY services may be justified without consideration of the period of time for recoupment of such skills.

The district provides an opportunity for students to attend summer school. It is providing support for many students. The district is commended for providing equal access for many students in the district.

It is recommended Special Services reviews the following requirements, and assure the district adopts systems, procedures and policies in regards to providing specialized transportation.

To maintain identified critical skills for students with disabilities, the district should ensure the following requirements are met to make certain that ESY services are available as necessary to provide a FAPE:

The student's ARD committee determines ESY services. Services are driven by student need and include a variety of options. ESY goals and activities are reflected in the student's current IEP.

ESY services are not limited to particular categories of disability.

District information indicates that all disability categories are considered for ESY. Consideration is by individual student need. ESY services are not unilaterally limited as to the type, amount, or duration. Consideration of service delivery includes community options and services.

Transportation, as a related service, is considered and offered to students with disabilities who need it to benefit from ESY services.

All district staff, including administrators, supervisors, teachers, related service personnel, and teaching assistants, should understand the purpose of ESY services and the role staff play in the consideration and delivery of ESY services. District staff participate in the consideration of ESY services discussion. Those staff involved in the provision of ESY services are informed of the

student's goals and other information related to ensuring the effectiveness of the services.

ESY services are connected to previous and future school year services. A communication system must be implemented that defines roles and responsibilities for ESY documentation to flow between and among district staff. Sending and receiving teachers must provide information and feedback regarding the provision and effectiveness of the ESY services. Framework for the ESY program must include a process for planning before the initiation of and following the end of ESY services.

District staff must ensure that parents understand information provided to them about the purpose and intent of ESY services and the role they play in the consideration and delivery of the ESY services. When parents have questions about this service, they know who to ask for further discussion or explanation of the process. Parents participate in the ARD committee discussion regarding the consideration of ESY services. Parents provide documentation to the ARD committee for use in the determination of ESY eligibility when it is needed or appropriate. Parents communicate with district staff and participate in the ESY services as they would for their child's school year services.

The district provides

Students with ESY accordingly to their IEPs	802
Out of district placements	180

It was found the staff do not use appropriate criteria/worksheet to determine eligibility. Most students served are ESN (mod severe).

Recommendation for consideration:

1. A cost analysis be conducted to determine the number of students receiving ESY and cost per student. Once the total cost of ESY is determined, the district should know the cost to the general fund.
2. Determine whether all students being transported qualify as determined by an ARD committee.

Staffing Caseloads for Related Services Providers

Related services are the developmental, corrective and other supportive services required to help a child with a disability benefit from special education (34 CFR 300.34). These services are written into students' IEPs and include, but are not limited to, psychological services, speech and language therapy, adapted physical education (APE), and occupational therapy.

The Education Code does not include maximum caseloads for certain related services; however, there are industry standards used as caseload guidelines. For psychologists and nurses, the reference used is the average in the state from KidsData.org and CalEdFacts, which reflects current information and should be updated annually. Psychologist and nurse caseloads are based on K-12 total district population. All related service providers listed below are considered itinerant and do not maintain self-contained classes.

Additional factors to consider include the following:

AB 114 - Educationally Related Mental Health Services (ERMHS) has recently effected change within the roles and responsibilities of school psychologist's providing direct services. If ERMHS is included under psychologist roles, consider the caseload weight.

Increased medical care in the schools and increased food and other allergies has increased responsibilities to school nurses. The types of care and nursing positions should be carefully evaluated.

Travel time and distance between school sites, Number of school sites

Industry Standards

Consultation vs. direct service	Range	Source or Notes
APE	1:45-55	
D/HOH	1:15-25	
OT/PT	1:45-55	
OI	1:45-55	
Nurse	1:2784	Calculated by total District population. KidsData.org
Speech Pathologist	1:55	Education Code 56563.3
VI/OM	1:10-30	
Psychologist	1-to-977	
SLP Preschool	1-to 40	

Commendation

The district is commended for making a commitment to have additional staff to meet the social emotional, academic and behavior need to all students.

The district supports school nurse staffing. Nurses play an essential role in the health assessment of students who are referred for possible special education placement. All staff providing direct services to the students are committed and dedicated. Staff meets the challenge of serving the needs of some of the most challenging students in the district.

Recommendations

1. Review all speech caseloads to assure students requiring services are being provided for and evaluate whether some students could be serviced in least restrictive environments.
2. Develop speech handbook outlining eligibility criteria and exit process.
3. Analyze each caseload of special education staff and determine how it relates to statewide caseloads and staffing ratios.
4. **Develop an OT, PT and APE handbook that includes but is not be limited to the following:**
 - OT/PT/APE roles and responsibilities
 - Eligibility requirements
 - Assessment guidelines
 - Guidelines for entry and exit
 - Evaluation tools
 - Transition planning
 - Service delivery consideration
5. Ensure the Director of Special Education/Student services reviews and discusses all staffing allocation and caseloads monthly with the business office and Human Resources Department. These discussions should include any need for increasing or decreasing staff to meet the needs of special education students.
6. Develop a consistent process and procedure for formalizing the parent request for assessments.
7. Consider developing a written guideline for determination of assignments for SLPs and school psychologists. SLP and school psychologist should have input into the assignment and schedule

8. Consider assigning a lead district speech pathologist to assess all speech referred students.
9. Ensure the school psychologists and SLPs have a current weekly/monthly schedule, and communicate any schedule changes to the school sites to which they are assigned.
10. Analyze all related services caseloads including school psychologists, speech and language pathologists, adaptive physical education, and occupational therapy

School Psychologist overview and caseloads

As calculated by total district population, KidsDATA.org and CalEDFACT, the statewide average is psychologist per 1,977 students. District enrollment is 14,377. Based on the district staffing ratio, the district would have more school psychologists using the above statewide data.

School Psychologies

# Of FTE District	District enrollment	Ratio District	Industry Standard
23	14,377	1- 625	1-to-977

Breakdown

School psychologists Authorized	23
ERHMS Psychologists	1.16
ERMHS SBT Team	3

Through leadership of school psychologists working collaboratively with other team members, they can assist the district administrative leadership with conducting Manifestation Determination meetings that are effective and legally defensible.

This is a critical area for the district in dealing with student behavior that maybe harmful to themselves or others. The district is encouraged to make this a priority training and accountability for staff in assuring MD meetings are held property and effectively for all parties.

Manifestation Determination

From conducting interviews, the district staff there is a clear need to **develop training** and accountability for staff in conducting Manifestation Determination (MD) meetings. **It was noted by reviewing some cases the following is occurring:**

1. Some School psychologists do not understand how Manifestation Determination works
2. No site administration present at IEP meeting
3. Paperwork is frantically being drafted prior to IEP meeting
4. Not all IEP Team members understand or know the MD procedure
5. Some team members were unfamiliar with the form for MD
6. If interpreter is required, make sure they know date, time and location of meeting
7. If parents do not show, make sure documented evidence is on file, that district made every diligent effort to get parents to meeting.

The district uses all school psychologists for a small percentage of time to provide mental health counseling/services as designated in the IEP.

Staff indicated that mental health and referral processes are challenging. Staff indicated that the development of a MTSS committee and implementation, training would assist with behavior issues. However, staff stated more communication is requested on the roles and responsibilities of staff regarding MTSS implementation.

The school psychologist has a districtwide procedural manual that outlines their responsibilities and roles, **however, it is not endorsed by the district superintendent or required by school psychologists to be implemented on a districtwide basis.** Therefore, school sites request their expertise and request services that take away from their primary role as testing students to determine special education eligibility.

Staff indicated there is limited time for the school psychologists to work with SDC classrooms and give teacher support. The school psychologists are highly qualified and professional staff along with the other related services staff members.

From staff interviews throughout the district, expressed the following concerns. It may be worthwhile for the district administration to consider exploring the creditability of these concerns, and consider what corrective action, maybe required, if necessary:

1. There is a lack of systems, and continuity exists lacks between school sites, and within school sites.
2. There are no consistent procedures for onboarding new staff. This should be automatic and all departments and school should be prepared and on the same page.

3. Need to emphasize need for cohesive programming based on evidence and not teacher preference.
4. One option the district could consider is exploring Pyramid Approach to Education. It is not a curriculum, but a framework for teaching based on behavior analytical principles. Since the majority of referral are due to student behavior.
5. The administration must assure there is a continuum of learning and programing that is consistent between grade levels. For instance, half of the district preschool teachers will actually implement Picture Exchange Communication System (PECS). When these students transition to TK/K there is not a continuation of the program, it is discontinued.
6. Overall, the district lacks preschool through k-12 systems and consistently regarding learning. For example, many staff stated each elementary school site has its own reading program.
7. Some school psychologists are not trained property, as a result do not write legally defensible assessment reports regarding Manifestation Determination.

Recommendations:

District considerations for school psychologists

1. Remove most of the school psychologist's general education responsibilities, such as counseling students unless identified in IEP.
2. Clarify the role of the school psychologists.
3. Ensure superintendent endorses the procedural manual and have administrative staff mandate all school psychologists use the School Psychologist Procedure Manual (handbook), which will consist of the following topics:
 - Table of contents should include, but not be limited to:
 - Mission and philosophy, Eligibility Criteria, Assessment, Manifestation Determination, Disciplinary Coordination of Serves, Move-in Students with Special Education Services, Parent Request of Assessment, School Psychologist Role and Responsibilities (intervention, consultation), Crisis Intervention
4. Training in writing legally defensible reports. Assure all school psychologists understand their role at MD IEP meetings and write best practice reports regarding MD.
5. Have Lead school psychologist meet monthly with all school psychologists, develop agenda and minutes and share with Executive Director of Special

Services.

6. Instead of relying on psychologists for counseling and mental support, consider hiring counselors/clinical therapist or social workers to each site (including elementary schools). The Director of Special Services should meet with all the school psychologists (and other stakeholder the director determines appropriate), and develop and effective mental health delivery system, and then present to Superintendent Cabinet for review, fiscal analysis, and consideration.

The district behavior specialists should be involved within this discussion.

Adaptive Physical Education

No FTE	District Caseload	Industry standards	District average
4		1:45-55	

Under IDEA 2004, occupational therapist (OT) is referred to as a “related services,” which are defined as those services “required to assist a child with a disability to benefit from special education” (34 CFR300.34 (a)). OT services are determined through the IEP process.

To receive them, a student must first be eligible for special education. The district contracts with School Steps for some OT services.

Occupational Therapists

Occupational Therapists Caseloads Program	No. of FTE	Caseload	District Caseload Average	Industry Standards
	5			1:45

SRCS has 1 certified occupational therapy assistant (COTA) who can provide direct series to students according to the IEP, but is not allowed to assume caseload management, IEP implementation or progress reporting. COTAs work under the direction of the OT. The industry standard is one to 45 to 55 students for OTs without the use of a COTA.

The industry standards are one to 45-55 students for OTs without the use of a COTA.

The district has no guidelines or handbooks outlining process and procedures for OTs. OTs bill for Media-Cal, but only for assessments and not direct therapy.

School Nurses

The district has 5 FTE districtwide nurse for approximately 14,377 students. District staff interviews and data indicate the nurse provides support to students with IEPs, 504s and to the general population for daily medical needs required for all sites.

Although there is no mandated requirement, depending what agency to review, the state's average nurse-to-Student ratio as 1-to-2815. This places the district within industry standards with 5 FTE.

The district has 5 credential school nurses. According to Kidsda.org the industry standards is 1-to-2,784.

Nurse Caseloads

Program	No. of FTE	Enrollment	District Caseload Average	Industry standard
Nurses	5	14,377	1:2,873	1:2,784
RN				
LVN				
Certified Nursing Assistants				

Physical Therapists

Physical Therapy (PT) services are a “related service” under IDEA 2004, which are defined as those “required to assist a child with a disability to benefit from special education” (34 CFR300.34 (a)). PT services are determined through the IEP process. To receive them a student must first be eligible for special education.

Physical Therapists FTE	District caseload	Industry Standard
		1:45-55

Speech and Language Pathologists

Educational Code 56363.3 establishes the maximum caseload for speech and language pathologist (SLPs) serving student ages five to 22 at 55 students, and EC 56441.7(a) establishes a preschool maximum caseload of 40 students.

Presently the district has 22 SLPs, with 1 opening. Caseloads were review, but need further review and analysis. The district should assure all SLPs are working to education code caseload requirements.

A more difficult task for the district organizationally is to review the speech delivery system and reduce caseloads by removing students who do not require the services a certificated speech therapist provides.

SLP staff were found to be hard working and professional. Due to lack of administrative direction and expectation over the last several years, the SLP staff work in isolation and each SLP makes decisions based on individual site needs, rather than a cohesive and coherent district wide delivery system. The SLP staff need a procedural manual that will provide and assure eligibility and exit procedures are implemented consistently district wide.

From reviewing the teachers’ contract, interviews with providers, central office staff, and related services staff the following are the Substantiated Findings:

1. RSP and SDC teachers see students every day and get \$15.00/day/student.
2. SLPs get \$15.00/day/student regardless of how many times a week/month they provide services for that student.

The math on that is, for a month with 20 days, each student over caseload cost the district \$300. If an SLP has 20 students over that is \$6,000/month on top of salary.

3. Many of our elementary SLPs typically see students twice/week for 30 minutes, and many see students one time/week for 30 minutes. The SLPs

at the elementary level workload are more involved than at the secondary level: with screenings, initials, and case manage students.

4. The SLPs at the secondary level, rarely manage caseloads and only provide services. Most if not all, only see student's 1time/week for 30 minutes, some 1 time/month for 30 minutes but they are getting paid \$15.00/day/student.
5. Another problem with the overages is that there is no incentive to dismiss students.
 - * The higher the caseload the more money for the staff member.
 - * The district SLPs have integrity, but the district needs to give the SLPS more staffing, so they can discontinue this costly and ineffective service.
6. There is no speech handbook outlining the exit process, referrals, and placement procedures.
7. Staff indicated the district has no procedural guide lines on eligibility or the exit process. Some caseloads are high some low, but it appears many students have been on the caseload for years for articulation or language development.
8. The district took back several classes of ESN students from SCOE which inundated some of SLPs.
9. Some district SLPs now has over 90 students on their caseload, and two other SLPs have over 70. All of these SLP are working very hard and are ethical members of the staff. However, they are burning the candle at both ends.
10. Cost to the **district? Roughly between an extra \$6,000 to \$15,000and month on top of salary.**
11. The district is in year five of paying the SLPs for overages. The caseload cap is 55 for both elementary and secondary. It is 40 at the preschool.

Recommendations:

Considerations for the district:

1. Implement a district wide exit process for SLP students, especially essential at the secondary level.
2. When the SLPS are evaluated, the administration should be looking at speech and language assessments and make sure that the SLPs are following the eligibility criteria, and not over identifying
3. Ensure SLP services are not necessarily provided at the secondary ESN level where students who do not NEED speech therapy. If their cognitive scores are commensurate with their language scores there is no discrepancy. The student has maxed out and is doing the best that they can. This can be tricky with advocates and pushy parents of course. However, considerations could be made.
2. If the program managers became more involved with the ESN secondary students and understood our assessments that would also be helpful.
3. Streamline the process for retired SLPs who have to reapply every year which is a waste of time and district finances. Streamline the process for HR to post on Adjoin, potential SLPs to interview with district staff, HR to rehire and get emails and SEIS set up.
Note: One SLP who worked last year, was ready to start at the beginning of the school year but the position was not posted. She is still waiting to get on board, and students could have been provided services.
4. The district contract allows teacher and SLP overages. This should be renegotiated the certificated contract through respectful and collaborative negotiations.
5. The district needs to provide an exit procedure for all SLP students who do not qualify for services.
6. Determine what speech and language student could receive such services in the general education classroom with support, if necessary.
6. Through mutual respect, the SLPs and teachers should discuss through open and transparent collective bargaining how to discontinue the overage stipend. It makes for the appearance, that the district could over identify students, for staff financial gain and not be in the best interest for the student.

Note: It will be argued that due to lack of SLP staffing, there is an increase of caseloads, however, exiting students at all school grade levels who may not require the services may help with caseload overage.

Conduct an analysis to determine overage caseload of SLP and keep caseloads at maximum of 55, not to exceed, and instead of paying overage, the district can hire part time (retired SLPs) to work part time to meet student needs.

7. The district with SLP staff, input and engagement with the administration, develop a Speech and Language Procedural Manual. This manual will consist of but not be limited to the following: letter of endorsement from the Superintendent, mission and vision statement, role and function of SLP, exit and eligibility criteria. All appropriate district staff will receive in-service training, and these procedures, systems and policies will be required to be consistency implemented districtwide, that will provide for cohesive and coherent SLP delivery system.

In summary, the district could consider the following strategies that would be helpful. These actions would help the district establish a clear framework for speech services, promote efficient caseload management, and ensure services are focused on students who genuinely require ongoing support.

1. **Develop a Comprehensive Speech Handbook:**
 - Create a district-wide handbook outlining **procedures for referrals, eligibility criteria, placement, and the exit process** for speech and language services. This would provide clarity and consistency across schools.
 - Include detailed criteria for when students qualify for speech services and when they are ready for discharge, focusing on measurable goals for articulation and language development.
2. **Implement Consistent Eligibility and Exit Criteria:**
 - Establish district-wide criteria for speech and language eligibility, including benchmarks for articulation, fluency, and language skills.
 - Define specific exit criteria, ensuring students are discharged when goals are achieved and that caseloads are reserved for those requiring active support.
3. **Regular Caseload Reviews and Reassessments:**
 - Schedule annual reviews to evaluate each student's progress, ensuring that only students needing ongoing services remain on caseloads.
 - For long-standing cases focused on articulation or language development, consider alternative support options within general education for students nearing goal achievement.
4. **Equitably Distribute Caseloads:**

- Use standardized criteria to assess caseload sizes and redistribute workloads if necessary, creating a more balanced distribution across speech-language pathologists (SLPs) and schools.
 - This approach ensures SLPs can focus effectively on each student's needs without overburdening certain staff members.
- 5. Staff Training on New Procedures:**
- Conduct workshops or in-service training to familiarize all SLPs, special education staff, and administrators with the new handbook, eligibility guidelines, and exit protocols.
 - Encourage staff input in developing these resources, fostering buy-in and a clear understanding of procedural changes.

Stakeholders Taskforce

The following process for development of SRCS District Special Education Taskforce Steering committee. In light of the district superintendent expertise in understanding the importance of development of district adopted systems to provide for a coherent and cohesive delivery system the following recommendation's will assist in meeting that goal.

From reviewing the results from this special education review, regarding special education staff's frustration with lack of communication, and action by the special education department over the last several years. It will be the intent of the steering committee to guide special education and provide a forum for staff to express concerns and solutions to challenges; they will have a professional forum to work with that will be mutually satisfying for all concerned.

The district- wide Goal

To develop a model SRCS District Special Education Delivery System that is coherent and cohesive, severing all students that consists of systems, procedures and policies districtwide.

Special Education Taskforce (Steering) Committee, consisting of stakeholders

The development of a District-Wide Special Education Taskforce will allow stakeholders to have input, prioritize goals, and monitor the special education delivery system. With stakeholder's Involvement, the district administration will assure staff have a voice on how and why special education services are provided. It will provide the mechanism on how the to meet the districtwide goal of developing a model delivery system.

With the endorsement of the district superintendent and board of trustees, it will give the steering committee support, recognition, accountability, and encouragement. This will be accomplished with leadership of the Executive Director of Special Services and guidance from the Assistant Superintendent of Educational Services.

The steering committee will be an effective tool that will provide the following:

- Provide two-way communication between school site staff and administration

- Provide staff with the opportunity to prioritize and monitor special education district-wide goals/tasks
- Opportunities to recognize special education successes
- Opportunities for special education staff to discuss how to meet the challenges through mutual respect of all parties
- An open forum to discuss what is working, not working and being solution oriented
- Understanding how staff will work together to meet compliance requirements
- The development of a procedural manual that will provide district wide systems, procedures, and policies that should be mandated to be implemented consistently at each school site by the administration

The taskforce is only advisory, with no bylaws or board policies governing the body. It is the intent of the administration to develop a communication system between special education staff and the special education department; however, agendas and minutes should be kept on all meetings and distributed to all district administration and all members of the committee.

A key point:

The steering committee members must have a feeling that this is not a waste of time, it cannot be administratively driven, with staff having no opportunity to engage in providing feedback in supporting change and implementation of special education throughout the district. The committee members are the ambassadors of the district to communicate what is happening, why and when at the school site level. Through mutual respect and trust, all committee members must feel valued and their input respected. This does not mean we agree on all findings and recommendations, but staff recognize they have opportunity to engage with the administration openly and respectfully.

The districtwide special education steering committee should consist of, but not limited to the following; including, but not limited to:

Administration

Attendance of the superintendent briefly throughout the school year to express thanks and appreciation for the work and efforts of all staff

Executive Director of Special Services

Coordinator of Special Education

Program Managers

Assistant Superintendent of Educational Services

Human Resources as deemed necessary (not on the committee, but could be requested to attend to clarify human resource issues)

Business Services as deemed necessary (not on the committee, but could be requested to attend to clarify human resource issues)

Staff Representatives

One certificated staff member from the different programs: RSP, SDC, and Preschool ESN

Classified staff

Support staff
Site administration
General education staff
Parent representative

Related services staff such as lead school psychologist, nurse, and lead speech and language Pathologist, Union representatives, both classified and certificated other staff.

In summary the district should consider the following strategies:

1. **Form the Taskforce with Key Stakeholders:**
 - Assemble a diverse group that includes special education staff, general education teachers, administrators, parents, students, and community members.
 - This inclusive approach will ensure that various perspectives are represented and that the taskforce's initiatives are widely supported across the district.
2. **Define the Taskforce's Purpose and Goals:**
 - Establish clear objectives, such as creating a **coherent and cohesive delivery system** that aligns with the superintendent's vision for district-wide systems.
 - Goals could include improving service delivery, promoting inclusivity, enhancing resource allocation, and standardizing procedures across schools.
3. **Set Up Subcommittees for Focused Areas:**
 - Create subcommittees within the taskforce to address specific areas like referral processes, intervention models, eligibility criteria, and staff training.
 - This structure allows for a targeted focus on essential components of the delivery system while ensuring collaboration toward overall district goals.
4. **Create a Timeline and Action Plan:**
 - Develop a detailed timeline for the taskforce's work, including milestones for assessing current systems, gathering data, and implementing recommended changes.
 - Include phases for piloting changes in select schools and assessing the impact before district-wide adoption.
5. **Leverage the Superintendent's Expertise:**
 - Use the superintendent's experience in system development to guide the taskforce in creating a sustainable and scalable model.
 - The superintendent can help align the taskforce's goals with district priorities and ensure that new systems are integrated seamlessly with existing structures.
6. **Engage the Broader District Community:**
 - Hold informational sessions or town halls to keep the district community informed of the taskforce's progress and gather ongoing feedback.
 - This transparency builds trust and allows the taskforce to address concerns proactively.
7. **Monitor, Evaluate, and Adjust:**
 - Set up metrics to assess the effectiveness of new systems and processes and schedule regular evaluations to make improvements as needed.
 - Establish feedback loops with schools to understand on-the-ground challenges and successes, ensuring the taskforce's recommendations remain responsive to actual needs.

Once the committee is selected, input and final selection of the committee members should be made by the district Superintendent. This districtwide special education taskforce, guided by the superintendent's expertise, can play a pivotal role in building a unified system that improves service delivery and inclusivity for all students.

Strategic (Action) Plan

Strategic (Action) Implementation Plan

This scope was added, to assist the newly appointed Executive Director of Special Services in regards to implementing the findings and recommendations of this report. Based on the need to develop policies, procedures and systems within the special education delivery system, an action plan should be developed that will cover 2 to 5 years.

The following areas should be addressed in a matrix format:

- Goals (recommendations from the report)
- Tasks to be completed to meet the goals
- The employees responsible for implementation
- Status of outcomes
- Progress made on implementation of meeting goals and completion of tasks
- Evidence of accomplishment
- Timelines to accomplish tasks

The implementation (action) plan will serve as a roadmap for the newly appointed Executive Director and Coordinator of Special Services in developing special education systems, policies, procedures that ensure a legal, fiscally compliance, and programmatically sound special education delivery system.

It will serve as an accountability document to measure progress made in the development of a best-practice special education delivery system.

The action plan should consist of the director and coordinator of special services and should consist of district stakeholders of such as but not limited to the following;

Special education teachers, classified, support staff, site administrators, general education staff, program manager, parent representative, related services staff such as school psychologists, nurses, speech and language pathologists, special education staff, etc.

The district must develop an intensive strategic plan and a 2- to 5-year implementation plan by first creating leadership teams to include district office staff and initially include the superintendent, principals, general education teachers and parents. The strategic plan

needs to be transparent and supported by the board, and current board policies must be developed.

A systemic change of this type should include all staff and should be supported outlining timelines for development and implementation, intervention curriculum adoption and implementation, progress monitoring tools and methodologies, data analysis strategies, and implementation of the SST process and finally in the assessment for special education services.

This area must be a priority. Educational Services and Student Services in conjunction with school sites must have regular ongoing communication, meetings, and collaboration.

To support the Executive Director and Coordinator of Special Services in developing a robust special education system, here's a framework for the implementation plan that serves as a comprehensive roadmap:

1. **Establish Clear System Objectives:**
 - Define objectives for a **legal, fiscally compliant, and programmatically effective** special education system.
 - Outline specific goals around compliance with federal and state regulations, efficient use of resources, and high-quality service delivery for students.
2. **Develop Policies and Procedures:**
 - Create standardized policies that address eligibility, referral, placement, and exit criteria to ensure consistent practices across all schools.
 - Draft procedural guidelines for IEP (Individualized Education Program) development, progress monitoring, and accountability measures to meet legal and educational standards.
3. **Align Resources and Budgeting:**
 - Conduct a financial audit of current resources allocated to special education to identify areas needing adjustment.
 - Implement a budgeting model that allows for **fiscal compliance and efficient resource allocation** to meet students' needs without exceeding the district's budget.
4. **Build an Accountability and Compliance Framework:**
 - Establish an internal review process to ensure that all practices meet legal requirements, including timelines, procedural safeguards, and data documentation.
 - Set up systems for regular compliance audits to keep the district accountable and to identify areas for improvement.
5. **Create a Training Program for Staff:**
 - Develop ongoing professional development on new policies, legal requirements, and best practices to support educators, administrators, and special services staff.
 - Include training for data collection, reporting, and compliance standards to help staff contribute to a fiscally sound and compliant system.
6. **Engage Stakeholders and Communicate Progress:**
 - Use the taskforce and other channels to involve stakeholders in the development process, gathering feedback and adjusting the plan as needed.

- Provide regular updates to district leaders, school staff, and families to foster transparency and buy-in.
- 7. **Implement a Phased Rollout and Pilot Program:**
 - Begin with pilot implementations in a few schools to test new systems, procedures, and policies, refining them based on feedback and outcomes.
 - Gradually expand to district-wide implementation, supported by training and resources, once initial results indicate stability and effectiveness.
- 8. **Monitor, Evaluate, and Adjust:**
 - Develop metrics for measuring system effectiveness, including compliance rates, fiscal efficiency, and programmatic outcomes for students.
 - Schedule periodic evaluations to assess the success of each part of the system and make adjustments as needed to meet evolving needs.

Procedural Manual

Procedural Manual, Policies, Systems, Procedures

The district does not have a current District Special Education Policy and Procedural Manual to guide special education practice and decision-making. The district's staff does not use a document to consistently communicate a cohesive special education delivery system. Subsequently, there are no clear written directions, guidelines or procedures for the Special Education Department staff and site principals.

There are no processes existing to guide staff with addressing questions and seeking support. SCOE has a document that SRSC could consider modifying to fit their district.

The manual should consist of but not be limited to the following:

- Purpose, mission and vision statement
- Referral process
- Assessment
- Case management
- Continuum of service options
- Specialized programs
- IEP development, notice of IEP meeting, membership, request for meeting
- Administrative interim placement
- ERMHS
- Policies and procedures
- Organizational chart of the district and department
- Suspensions and expulsions
- Extended School Year (overview, services and programs, eligibility)
- Manifestation determination (behavior is a manifestation of the disability or not)

After stakeholders review and provide input to the revised and updated procedural manual, the district should consider providing some additional areas to strengthen the district wide process in the document. The areas identified may require a separate section

or additional information to be added to procedural manual. As staff review the document, additional areas may be identified including, but not limited to the following:

The identified areas are as follows:

- Development of Mission, Vision, and Goal Statements
- Organizational chart - a flowchart of Special Education Department staff with their specific duties and responsibilities to assist site staff in knowing who to call when a specific question arises.
- Continuum of educational options offered in the districts with descriptions of each that include nonpublic schools, state schools, etc.
- Clear definition of accommodations and modifications and the responsibility of the general education teacher in providing these based on a student's IEP.
- Definition of Due Process and Complaints to provide clarity as to what issues may result in which of these actions.
- The process that the district must follow and CDE follows when either a due process or a complaint is filed.
- The responsibility of the site administrator and site staff in responding to the complaint and/or resolving a complaint when it is filed.

The responsibility of the site administrator and site in responding to the due process when it is filed and/or resolving the issue(s) that resulted in the due process filing.

- How and when transition IEPs should be held for students changing programs from one school to another at the same level, or from one level to another (i.e., elementary to middle school).
- How interim placements are completed for a student who enrolls in the district when schools are not in session, and how this information is provided to the school site on time.
- How all interim placements are completed, who is responsible for the paperwork, who decides where the student will be placed, and the process for ensuring that the receiving school is prepared for the student?
- An intake procedure form developed by the Special Education Department, with input from sites, could be completed at the time of the interim placement so that a student's specific requirements are in place when the student comes to school the first day. Additionally, if a behavior support plan is part of the IEP, it would be available prior to the student's first day, as well as all necessary personnel on board the day the student arrives.
- How district students attending a nonpublic school will be transitioned into district operated programs, who will attend the IEP meetings when this is being discussed, how the site that the student may attend is kept informed, and the responsibility of the district office and the site for the implementation of the IEP?
- When an interpreter is to be at an IEP meeting, who is responsible for ensuring that the interpreter is present and the duties of the interpreter?

- When documents and/or IEPs are to be translated into the language of the parents, what is the process and who is responsible for the translation and getting the documents to the parents?
- When special education records are requested by parents or parent attorneys, what is the timeline for producing the records, which records are copied, and who is responsible for ensuring that all required records are copied and sent on time?
- The process for hiring a new aide for a school site, either as an additional classroom aide or as a specific aide for a student, based on that student's IEP. The process would appropriate forms and timelines for approval from initiation through hiring.
- The procedure for determining if an aide is moved with a student from one site to another.
- The procedure for determining if an aide is no longer needed for a student.
- The procedure to determine where an aide will be placed when the student they have been assigned to either moves from the district or no longer requires an aide.
- The formula for assigning aides to mild/moderate programs, moderate/severe programs, and specialized programs with information on exceptions to this formula.
- When to schedule "staffing" or "file reviews" and who should attend these meetings.
- How to schedule IEP meetings when district special education staff should be in attendance and how to proceed if that staff are unable to attend.
- What must be included in an assessment report to ensure that the report is defensible in a due process hearing, and that the report is available to the parents at the IEP meeting?
- How to complete the forms required that have been identified as problematic, including the prior written notice, invitation to the IEP meeting, and the assessment plan.
- How to complete the IEP sections that have been identified as problematic, including transition, assessment, general education, and parental input.

Recommendations

The district should consider:

1. Develop a procedural manual to provide useful and legal guidelines for determining special education placements, reviews and process for teachers, parents, administrators.
2. Establish a committee made up of representatives of the Special Education Department staff, site administrators, site special education staffs, related services, and other district departments to review the procedure manual and make changes as needed. This committee should meet as soon as possible and be given a short time- line to revise the document.
3. Develop a training module and schedule to distribute the adopted procedure manual to all site administrators and special educators so that there is consistency in providing special education throughout the district. This should be provided

during the 2025-26 school year.

The district should work from January –June 2025 in developing their manual.

4. Provide the procedure manual online so that it can be accessed by all staff as well as well as having a hard copy at each school site for reference. Establish a process to write the additional sections or portions of sections of the procedure manual indicated in this report.
5. Establish a committee to review these additions to the procedure manual.
6. Develop a training module and schedule to distribute these additions to all principals, special education staff and central office administration.
7. Develop a process for reviewing the district procedure manual at least annually and when any changes are required because of state or federal regulations or due to due process resolutions or corrective actions.
8. Ensure stakeholders, such as program managers, school psychologist, principals and parents, annually review the manual.
9. Provide training in implementing the manual at the beginning of the 2018-19 school year and annually for all stake holders. All stakeholders agree to these procedurals and provided consistent direction to site administration and staff as a recourse to follow implementation of special education.
10. Ensure the procedural manual is evaluated annually by the district task force consisting of stakeholders.
11. Finalize the manual by June 2025, if possible. All stakeholders (principals, teacher’s special education and general education, and program specialist) should review and have input into the final document.

All school sites receive in-service training during the school year, 2025-26.

All district office special education staff should deliver the same message and consistently interpret the manual with full agreement; this will ensure consistency of special education implementation in the district.

Non-Public Schools

Education Code section 56034 defines a nonpublic school (NPS) as follows:

“Nonpublic, nonsectarian school” means a private, nonsectarian school that enrolls individuals with exceptional needs pursuant to an individualized education program and is certified by the department. It does not include an organization or agency that operates as a public agency or offers public service, including, but not limited to, a state or local agency, an affiliate of a state or local agency, including a private, nonprofit corporation established or operated by a state or local agency, or a public university or college. A nonpublic, nonsectarian school also shall meet standards as prescribed by the Superintendent and board.

The Education Code requirements for a nonpublic agency (NPA) are now the same as those for an NPS. Specifically, Education Code section 56365(a) requires that an NPA be under contract with the local educational agency to provide the appropriate special educational facilities, special education, or designated instruction and services required by the individual with exceptional needs if no appropriate public education program is available.

When a district determines that it does not have the proper educational placement or related service for a specific student and cannot hire staff to provide related services to its students, it may contract with an NPS or NPA.

However, the district appears to continue to increase the number of students being placed in Nonpublic schools consistently the last several years. The district should examine each of these cases to determine the reason for the exit from Nonpublic School and identify those students who have returned to less restrictive settings.

A review of the District Level Annual Performance measure prepared by the Special Education Division of the California Department of Education shows that Santa Rosa High School did not meet their targets for Least Restrictive Environment (LRE) for students in segregated settings.

The placement in a Nonpublic School is made by the IEP team of which the parent is also a member. The goal with any restrictive placement or range of services is to return students to the district in the least restrictive environment.

Many districts have found that it is more cost effective to build alternative programs within the district to meet the needs of students who would typically require a nonpublic school.

In the following chart identified some Nonpublic Schools placements with a high number of district students enrolled at the secondary level. The district should review these cases and determine if an alternative program could be developed within the district to meet their needs. While this has the advantage of reducing the overall costs for the students' school programs, it also has the benefit to returning students to their home district in the Least Restrictive Environment.

Nonpublic Schools Enrollment San Rosa City Schools as of October 2024.

NPS	# of Students	Total Cost Per Student for 180 days	Total Costs for Year
ANOVA	<u>40</u>	\$56,226.60	\$2,249,064.00
Cypress	<u>14</u>	\$54,243.00	\$759,402.00
Greencare's	<u>18</u>	\$55,800.00	\$1,004,400.00
Hanna Academy	<u>18</u>	\$54,988.20	\$989,787.60
Journey	<u>12</u>	\$55,800.00	\$669,600.00
Lattice	<u>17</u>	\$54,406.80	\$924,915.60
New Directions	<u>10</u>	\$53,033.40	\$530,334.00
New Horizons	<u>2</u>	\$47,242.80	\$94,485.60
North Valley	<u>3</u>	\$47,187.00	\$141,561.00
Oak Hill	<u>1</u>	\$51,120.00	\$51,120.00
Plumfield	<u>6</u>	\$43,966.80	\$263,800.80
Sierra	<u>12</u>	\$55,159.20	\$661,910.40
Star Academy	<u>2</u>	\$64,067.40	\$128,134.80
Star View Adolescent Center/South Bay HS	<u>1</u>	\$42,359.40	\$563,380.23
		NPSs Grand Total for 24-25 SY thus far -	\$9,031,896.03

Nonpublic Agencies are certified by the California Department of Education to provide special education related services for students with disabilities. The issue of problematic student behavior in the school setting and the methods used to manage that can be high-cost items for the district. The study team recommends that this be a priority area for the district to address.

Some districts have created Behavior Support Teams as part of the Tiered Interventions within the Response to Intervention Model that can provide training and support for teachers to manage difficult behaviors that frequently drive the district to costly or restrictive settings for students. It would be worthwhile for the district to contact and/or visit other districts to see these kinds of teams.

Number of serving placed in Nonpublic school placements.	156
2024-25 Projected cost for Nonpublic School Placements	\$9,031,896.03.
Costs per student in Nonpublic School	\$57,896.
Cost per student in District Operated Programs	\$26,700.
Potential cost saving District take back Nonpublic Students	\$5,000,000.00

It would be a significant cost saving to examine the cost effectiveness, if the district could develop programs with support staff to meet the needs of these students in a least restrictive environment. This could be about \$5,000,000 in savings not spent on Nonpublic School and be available for district developed programs that meets students' needs and provides for a least restrictive environment.

Recommendations

1. Review the IEPs for students enrolled in the school listed above to determine if the district can create alternative program for some these students within the district.
2. Work with both the elementary and secondary staff to determine why there are so many requests for behavioral intervention with students who act out or present behavior disorders.
3. Explore options for crating support teams that can provide training to general education and special education teachers to manage difficult behaviors.
4. Review the programs and services provided by the County Office and determine the feasibility of providing direct services to its students.
5. Continue to evaluate all special education students who reside within the district's boundaries but receive outside services and determine the feasibility of serving these students with district-provided services in a less restrictive environment.
6. Continue to monitor its NPA contracts and determine how it may be able to provide these specific services to students within the district