



Coronado Unified School District Management Review

February 5, 2014



Joel D. Montero
Chief Executive Officer







CSIS California School Information Services

February 5, 2014

Jeffrey P. Felix, Ed.D., Superintendent
Coronado Unified School District
201 Sixth Street
Coronado, CA 92118

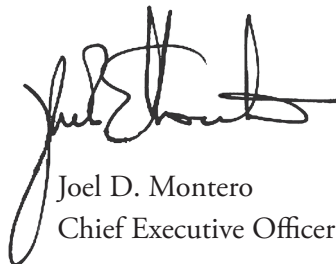
Dear Superintendent Felix:

In July 2013, the Coronado Unified School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement to provide a review of the district's special education programs and services. Specifically, the agreement states that FCMAT will perform the following:

1. Determine the district's general fund contribution to special education and make recommendations for greater efficiency.
2. Provide an analysis of staffing ratios and class load sizes using statutory requirements for mandated services and statewide guidelines.
3. Provide an analysis of all staffing and caseload sizes for related service providers including psychologists, occupational and physical therapists, behavior specialists, etc.
4. Review the SELPA allocation model and any options for revenue generation.
5. Review the internal controls used to monitor staffing levels.
6. Meet the maintenance of effort (MOE) and options for adjusting the MOE.
7. Review the use of resources allocated for nonpublic schools and agencies, mental health services and alternative programs, and make recommendations for greater efficiency.
8. Review the costs of due process and mediations over the past three years.
9. Review the efficiency of staffing for 1:1 instructional aides. Analyze procedures for the identification, building independence and the process for monitoring the use of resources.

This report contains the study team's findings and recommendations. We appreciate the opportunity to serve you and extend our thanks to all the staff of the Coronado Unified School District for their cooperation and assistance during fieldwork.

Sincerely,



Joel D. Montero
Chief Executive Officer

FCMAT

Joel D. Montero, Chief Executive Officer

1300 17th Street - CITY CENTRE, Bakersfield, CA 93301-4533 • Telephone 661-636-4611 • Fax 661-636-4647
422 Petaluma Blvd North, Suite. C, Petaluma, CA 94952 • Telephone: 707-775-2850 • Fax: 707-775-2854 • www.fcmat.org

Administrative Agent: Christine L. Frazier - Office of Kern County Superintendent of Schools



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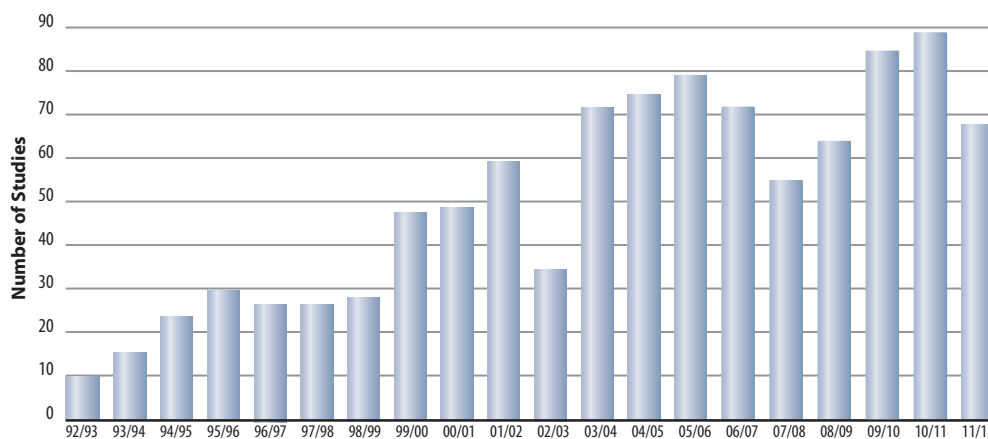
About FCMAT

FCMAT's primary mission is to assist California's local K-14 educational agencies to identify, prevent, and resolve financial and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related school business and data services. FCMAT's fiscal and management assistance services are used not just to help avert fiscal crisis, but to promote sound financial practices and efficient operations. FCMAT's data management services are used to help local educational agencies (LEAs) meet state reporting responsibilities, improve data quality, and share information.

FCMAT may be requested to provide fiscal crisis or management assistance by a school district, charter school, community college, county office of education, the state Superintendent of Public Instruction, or the Legislature.

When a request or assignment is received, FCMAT assembles a study team that works closely with the local education agency to define the scope of work, conduct on-site fieldwork and provide a written report with findings and recommendations to help resolve issues, overcome challenges and plan for the future.

Studies by Fiscal Year



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

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

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

Since 1992, FCMAT has been engaged to perform nearly 850 reviews for LEAs, including school districts, county offices of education, charter schools and community colleges. The Kern County Superintendent of Schools is the administrative agent for FCMAT. The team is led by Joel D. Montero, Chief Executive Officer, with funding derived through appropriations in the state budget and a modest fee schedule for charges to requesting agencies.

Introduction

Background

The Coronado Unified School District is located in San Diego County and serves approximately 3,174 students in grades K-12. The district has five schools: Coronado High, Palm Academy, Coronado Middle, Strand Elementary, and Village Elementary. Approximately 54% of students are residents of Coronado; 36% are from families connected with the military; and 10% are from interdistrict transfers, including children of parents who work but do not live in Coronado.

The district is a member of the South County Special Education Local Plan Area (SELPA) and serves approximately 300 students in special education. The district's 2013-14 unrestricted general fund contribution to special education is estimated to be 51.07% of special education expenditures. The district has requested a FCMAT study to review special education costs and determine if greater efficiency could be achieved.

Study Team

The study team for this report was composed of the following members:

William Gillaspie, Ed.D.
FCMAT Deputy Administrative Officer
Bakersfield, CA

JoAnn Murphy
FCMAT Consultant
Santee, CA

John Lotze
FCMAT Technical Writer
Bakersfield, CA

Trina Frazier*
Administrator
Fresno County SELPA
Fresno, CA

Matt Doyle, Ed.D.*
Executive Director,
Curriculum and Instruction
Vista Unified School District
Vista, CA

Anne Stone
FCMAT Consultant
Mission Viejo, CA

*As members of this study team, these consultants were not representing their respective employers but were working solely as independent contractors for FCMAT. Each team member reviewed the draft report to confirm accuracy and achieve consensus on the final recommendations.

Study Guidelines

FCMAT visited the district on December 9-11, 2013 to conduct interviews, collect data and review documents. This report is the result of those activities and is divided into the following sections:

- I. Executive Summary
- II. Fiscal
- III. SELPA Allocation Model
- IV. Maintenance of Effort
- V. Staffing Ratios and Caseloads
- VI. Internal Controls
- VII. 1-to-1 Instructional Aides
- VIII. Nonpublic Schools and Agencies, Mental Health Services and Alternative Programs
- IX. Due Process
- X. Appendix

In writing its reports, FCMAT uses the Associated Press Stylebook, a comprehensive guide to usage and accepted style that emphasizes conciseness and clarity. In addition, this guide emphasizes plain language, discourages the use of jargon and capitalizes relatively few terms.

Executive Summary

The Coronado Unified School District's unrestricted general fund contribution to special education, including transportation, for the 2012-13 school year was 44.15% of special education expenditures, and the 2013-14 contribution is estimated to be 51.07%. These percentages exceed the 32.08% identified by the California State Board of Education Work Group (2011) as the statewide average.

Several factors account for the increase in unrestricted general fund contribution, including the increased costs of residential placements in out-of-state mental health facilities, staffing at levels that exceed federal and state requirements or guidelines, settlement costs, and a possible \$300,000 discrepancy in local control funding formula (LCFF) calculations in the 2013-14 budget.

The district's certificated and classified staffing levels for instructional support programs and support services exceed both statewide statutory requirements and statewide averages recommended by School Services of California, Inc. The district should align its staffing levels with statewide averages, continue to provide services at the mandated level based on federal and state law, and maximize resources.

The district lacks adequate systems for internal control of special education staffing and expenditures. There is no systematic interdepartmental method for identifying, tracking and adjusting staffing levels. The Special Education Department is not involved in developing projected budgets each year. The district lacks sufficient communication among the Human Resources, Business Services and Special Education departments, which reduces overall efficiency.

Findings and Recommendations

Fiscal Issues

Unrestricted General Fund Contribution

The Coronado Unified School District's unrestricted general fund contribution, including transportation, was 39.42% of special education expenditures (or \$1,785,466) in 2011-12, 44.15% (\$2,363,741) in 2012-13, and is estimated to be 51.07% (\$2,695,982) for 2013-14. The State Board of Education Work Group reported to the state board in November 2011 that the expected average general fund contribution to special education for California school districts was 30.49% in 2011-12, and projected that this amount would increase to 32.08% in 2012-13. The district's 2013-14 budget is a projection.

There are unanticipated costs for newly enrolled or identified students with special needs or students requiring a change of placement to a more restrictive nonpublic or residential setting. Therefore, it is not unusual for cost projections to underestimate or overestimate actual costs. The Fiscal Crisis and Management Assistance Team (FCMAT) reviewed several revenues and expenditures that affect the special education budget. Both revenue and expenditures should be considered when developing budgets and determining the unrestricted general fund contributions.

The Legislative Analyst's Report dated January 3, 2013 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:

For FY (fiscal year) 2012, IDEA federal funding covered 16 percent of the estimated excess cost of educating children with disabilities, less than in FY 2008 when federal funding covered 17 percent of the cost and well below FY 2009 when additional funding through the American Recovery and Reinvestment Act (ARRA) covered 33 percent of the cost. IDEA Part B "full funding" for FY 2012 would have amounted to approximately \$28.33 billion, or roughly \$16.95 billion more than was actually appropriated. The shortfall in IDEA funding has been assumed by the states and local school districts.

The district's percentages of unrestricted general fund contributions, including transportation, are significantly higher than the statewide average, and more importantly have continued to increase.

Districts have little control over special education revenues. California distributes funds to special education local plan areas (SELPA) based on the total number of students in the SELPA, not on their disability status. Therefore, a district with declining enrollment will receive less funding for special education even if its special education enrollment is stable or increasing.

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 reporting methods districts, county offices and SELPAs use carefully follow maintenance-of-effort instructions; however, they vary. Some districts include transportation, while others do not; some have county office apportionments, but not others; and there are variations in how special education funds are allocated through a SELPA's allocation plan. Therefore, it is

not always possible to accurately compare a district's unrestricted general fund contribution to that of other districts. However, when the amount of the general fund contribution is excessive or is increasing, it becomes a concern that a district needs to address.

Changes in Revenue from Fiscal Year 2011-12 to the Fiscal Year 2013-14 Projected Budget.

Revenue Area	Base 2011-12	Increase/Decrease 2012-13	Increase/Decrease 2013-14
Revenue Limit/LCFF Transfer	269,482	+337,801	-307,283
Property Tax Transfer	92,725	+9,130	-8,625
Transfer of Apportionment from City	1,357,577	-131,084	-23,088
Impact Aid Funds	99,295	-27,708	+7,841
Impact Aid Funds	53,104	-9,695	-25,009
IDEA B	493,455	+7,932	+537
IDEA B non RIS	21,549	-2,300	-963
IDEA preschool	39,401	-3,470	-1,797
ERMHS State	0	+83,452	-48,736
Preschool Staff Development	196	-13	+13
ERMHS Federal	123,533	+55,275	-528
Workability	54,382	0	0
Low Incidence	335	-33	0
Staff Development	967	+5	0
ARRA funds- 3313,3319,3324	72,600	-72,600	0
Sub - Total	2,678,601	+246,692	-407,638
Transportation	65,090	-124	+10
Total	2,743,691	+246,568	-407,628

Source: Document of Revenue and Expenditures reports developed by the district for the years 2010-11 to adopted 2013-14.

The revenue table provides information on how some funding sources change in different budget years. These changes affect the amount and percentage of the unrestricted general fund contribution if the expenditures for the special education budget are not adjusted to the revenue.

Changes in Expenditures from Fiscal Year 2011-12 to the Fiscal Year 2013-14 Projected Budget.

Expenditure Area	Base 2011-12	Increase/Decrease 2012-13	Increase/Decrease 2013-14
Certificated Salaries	1,573,261.19	+198,488.60	+47,415
Classified Salaries	803,333.38	+129,689.56	+27,643
Benefits	785,147.40	+169,992.38	+67,881
Supplies	66,507.27	-23,671.03	-7,599
Contracted Services	671,629.80	+224,335.19	-219,672
Indirect	164,089.28	+99,345.80	-11,950
Sub- Total	4,063,968	+798,180.50	-96,282
Transportation	465,189	+26,662.00	+20,895
Total	4,529,157	+824,842.50	-75,387

Source: Document of Revenue and Expenditures reports developed by the district for the years 2010-11 to adopted 2013-14.

Although the district increased revenue received by \$246,568 from fiscal year 2011-12 to fiscal year 2012-13, expenses increased by \$824,842.50, creating an additional deficit of \$578,274.50. This deficit affected the unrestricted general fund contribution in 2012-13 and even more significantly in 2013-14 because of a projected revenue decrease of \$407,628, but a projected expenditure decrease of only \$75,387.

Two major areas in the budget's expenditures that require monitoring are salary and benefits, and contracted services. The district reported several reasons for the increase in salaries and benefits in 2012-13 including step-and-column increases, the hiring of seven instructional aides, the charge to special education of a portion of certificated salaries that had been charged to a general education resource, and one additional certificated position for mental health counseling.

Although costs for contracted services are projected to decrease to the fiscal year 2011-12 level, this is only an estimate and may not be accurate. Further, the budget information the district provided to FCMAT did not differentiate the costs of nonpublic schools, nonpublic agencies, independent contractors, and attorney and due process costs. A spreadsheet provided by the district for fiscal year 2011-12 specified cost areas for each expenditure, but did not calculate expenditures by category. This level of specificity was not available for fiscal years 2012-13 or 2013-14. Expenditures for these areas are discussed later in this report.

Budget information provided by the district included revenue received for Workability and educationally related mental health services; however, salaries and supplies for these programs are included in the general special education expenditures.

Recommendation

The district should:

1. Evaluate the salary and benefit increases in fiscal year 2012-13 to determine the exact cost of the step-and-column increases, the additional classified and certificated staff, and the salary moved back to special education to determine if these account for the entire amount. If not, determine what other expenditures were the cause of these increases and if any of these areas can be reduced to the fiscal year 2011-12 level.

SELPA Allocation Model

As a member of the South County SELPA, the district receives an allocation of state and federal funds to help pay the excess costs of providing special education services for its disabled students.

Based on a federally prescribed formula, the California Department of Education (CDE) distributes federal Individual with Disabilities Education Act (IDEA) Part B funds to the SELPA. Similarly, according to the requirements of Assembly Bill (AB) 602, the CDE distributes state aid to the SELPA's administrative unit.

The SELPA members have developed a plan for distributing these funds among themselves in a reasonably equitable manner. According to the South County SELPA, the philosophy of its allocation plan is first to disburse federal and state funds based on each member district's average daily attendance (ADA), and second to ensure that small districts are partially protected from high-cost programs.

Funding documents the SELPA provided to FCMAT indicate that the ADA for the member districts ranges from 3,056.73 to 38,662. Coronado Unified is the smallest district in the SELPA and therefore, based on an ADA distribution, receives the smallest amount of federal and state funds. For example, the SELPA allocation documents project that the district will receive \$93,230 in property tax compared to \$1,083,381 for the largest district.

Funding streams such as the out-of-home funds are distributed based not on ADA but on the percentage of licensed children's institutions (LCIs) and foster homes in a district. The district and the SELPA report that Coronado does not have any LCIs and therefore receives only \$1,158 of more than \$2,000,000 in funding that the SELPA receives for LCIs.

Programs such as the program for deaf students, inter-SELPA agreements and the day treatment program are paid for by a combination of funds: individual district responsibility based on students in programs, and funding taken from the allocation model prior to distribution (known as off-the top funding).

This funding model was developed and approved by the SELPA member districts, and is a model found in many multidistrict SELPAs that have a combination of large and small districts. The district and the SELPA also reported that the last complete review of the plan was at least three years ago. It is possible that the needs of the member districts have changed and that therefore a review of the entire model with the member districts may be appropriate.

Recommendation

The district should:

1. Request that the SELPA discuss with the member districts whether a review of the allocation plan is appropriate.

Maintenance of Effort

Maintenance of effort is a federal statutory requirement that a district must spend the same amount of state and local money on special education each year, with limited exceptions. When considering how to reduce the overall unrestricted general fund contribution, the district is required to follow the guidelines in the maintenance of effort document (20 U.S.C 1413(a)(2) (A)). This 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:

1. The voluntary departure, by retirement or otherwise, or departure for just cause, of certificated and/or classified special education or related service personnel (does not include contract nonrenewal or staff layoff due to budget shortfall).
2. A decrease in enrollment of children with disabilities.
3. The termination of the obligation to provide a program of special education to a particular child with a disabilities that is an exceptionally costly program because:
 - A. Child has left the jurisdiction of the agency; or
 - B. Child has reached the age at which the obligation of the agency to provide free appropriate public education to the child has ceased.
 - C. The child no longer needs the program of special education.
4. The termination of costly expenditures for long-term purchases, such as the acquisition of equipment or the construction of school facilities (must have per unit cost of \$5,000 or more).

The CDE recently reported to the state maintenance of effort work group that the federal regulations regarding the use of the local only test may be reinstated. There is language in proposed federal regulations that indicates districts may go back to the last time they used local only to pass MOE. However, if the local only test has never been used to pass maintenance of effort, then a district may only go back to the prior year. The final federal regulations have not yet been passed into law but are expected to be soon.

Recommendations

The district should:

1. Determine if it can reduce expenditures using any of the exemptions listed in the maintenance of effort documents, such as terminating an expensive nonpublic school (NPS) placement that is no longer required by the student, decreasing special education enrollment, or the departure of certificated or classified staff.
2. Monitor the proposed federal regulations regarding maintenance of effort and any changes regarding the local only test that may allow increased flexibility in reducing the unrestricted general fund contribution.

Staffing Ratios and Caseloads

The Special Education Department has an assistant superintendent, who is supported by four .20 full-time equivalent (FTE) coordinators and one full-time administrative assistant.

The four coordinators each serve in that capacity for .20 FTE in addition to their other full-time duties. They include a Workability/transition coordinator (transition teacher), high school coordinator (school psychologist), middle school coordinator (speech pathologist), and elementary coordinator (school psychologist). The coordinators work a 6/5 contract, which means they have a contract to work five days a week and are paid an additional .20 FTE for their coordinator responsibilities. The coordinators work as liaisons from the district office to the school sites, schedule individualized education programs (IEPs), coordinate the instructional assistants, take parent phone calls, write transition plans, provide training, make addendums to IEPs, and work with advocates. Staff reported that the coordinators have no authority to allocate district funds at IEP meetings. Two of the coordinators also receive an additional 7% annual salary stipend for holding an additional degree. These positions were established last year, and their additional time is funded by a contribution from the unrestricted general fund. The total cost of the four coordinators' stipends, including benefits, is \$91,632. These staff members report to the assistant superintendent of student services.

The district was not able to make special education staffing data available to the FCMAT team, and caseload information was developed manually. The class size data generated manually did not match the caseload data generated from the Special Education Information System (SEIS) and provided by the district. Some caseloads matched SEIS data; however, many SEIS caseloads were either higher or lower than those generated manually. One resource specialist listed in SEIS with a caseload of eight was not listed on the manually generated staffing and caseload list.

Maintaining data manually can lead to great inefficiencies. Manually compiled data is often inaccurate, outdated, or more vulnerable to human error. It is also time-consuming to enter and maintain. Inaccurate data may lead to decisions that are subjective rather than driven by data. The district does not use a position control system to monitor staffing assignments for certificated and classified positions; however, it plans to implement one in 2014-15.

It is best practice for special education administrators to monitor the following data monthly:

1. Caseloads and class sizes of all service providers and teachers using a carefully maintained database. This should include lists, by school and provider, to be shared with special education staff and school site principals.
2. The number of instructional assistants and one-to-one aides, especially when new staff are added.
3. All Designated Instruction Services (DIS) caseloads.

It is best practice to provide the above data monthly to the superintendent's cabinet, special education staff, and principals. In addition to not sharing this information with the superintendent's cabinet, the district's Special Education Department does not have a data-driven proposal process for cabinet to review and approve staffing additions when they are being considered.

The district also lacks a formal process and procedures at the school sites for instances when a special education teacher's caseload exceeds the maximum allowed. Although district-provided data indicates that no teachers' caseloads exceed the maximums, a formal process is needed in case this occurs.

The California Special Education Management Information System (CASEMIS) can generate reports on identification rates and exit rates of special education students, trends in disability areas, high-incidence disability areas, and data by grade, disability and ethnicity. The district does not frequently run reports to be disseminated and discussed with all special education staff. These reports should be discussed with both the special education and general education staff.

According to CASEMIS data provided by the district, the number of special education students increased by 4% from December 2011 to December 2012. The increase mainly resulted from a 15% rise in the number of students identified on the autism spectrum. However, increases and decreases in other disability areas contributed to the overall 4% increase. The area of speech and language impairment (SLI) is of considerable concern because students identified as SLI represent 39% of the total students in the special education program. SLI identification decreased by 4% from 2011 to 2012; however, it still remains high and should be examined and closely monitored.

Recommendations

The district should:

1. Consider generating caseloads and class sizes based on the SEIS data rather than manually.
2. Ensure that special education administrators continually monitor caseloads, class sizes, data and trends.
3. Use data to drive decisions regarding staffing, especially when any growth is needed or requested.
4. Provide the cabinet with written proposals when increases in staffing are required.
5. Provide data to the cabinet, special education staff, and principals monthly.
6. Create a database that aligns with the Human Resources Department system to track placement and movement instead of relying on manual entry.
7. Implement a position control system.
8. Consider evaluating special education SLI identification practices to decrease the number of students identified in this disability category.
9. Develop a formal process and procedures at the school sites for instances when a special education teacher's caseload exceeds the maximum allowed.

Moderate to Severe Special Day Class Caseloads

FCMAT utilized district data to analyze class and caseload size using the statutory requirements for mandated services and statewide guidelines. The Education Code does not indicate maximum caseloads for special day classes (SDC) however, School Services of California, Inc. (SSC) has developed recommended caseload guidelines using data collected throughout the state. These guidelines are used as the standard of practice for efficient special education caseloads and

staffing. The district uses a class size maximum of eight students for moderate to severe SDCs. The manually generated data provided by the district was used to calculate class size ratios.

The following table is organized by type of SDC and provides a class size comparison to SSC guidelines. These class size comparisons are divided by program, school site, number of students, total classroom staffing, including instructional assistants and staff to student ratios. The district class titles differ from the SSC category titles; however, the composition of the classes described by district staff corresponded with the SSC categories and is indicated in this table.

Moderate to Severe Special Day Class Caseload Ratios

Program	Site	Teacher FTE	No. of Students	No. of Teacher Assistants	CUSD Ratio per Classroom	SSC Recommended Caseload
Moderate/Severe	ECDC	2	20	5	10 Students 2.5 Assistants	8-10 Students 2 Aides
	Village Elementary	2	10	6	5 Students 3 Assistants	8-10 Students 2 Aides
SSC Category: Multi-Handicapped	CMS	1	7	4	7 Students 4 Assistant	8-10 Students 2 Aides
Moderate/Severe (Nonsevere Handicapped)	CMS	1	9	4	9 Students 4 Assistants	12 Students 2 Aides
SSC Category: Developmentally Delayed	CHS	1	13	2	13 Students 2 Assistants	10-12 Students 2 Aides

Source: School Services of California, 2011 and Coronado Unified School District

FCMAT found that most moderate to severe SDCs have fewer students than recommended by SSC, but a much higher number than recommended for instructional assistants except Coronado High School and the Early Childhood Development Center. Coronado Unified's moderate to severe SDC is composed of students similar to those in a SSC multihandicapped SDC, which has a guideline recommending 8-10 students and two instructional assistants per classroom.

The Early Childhood Development Center has an average of 10 students and 2.5 instructional assistants per class, which is slightly above the SSC guideline. The number of students per class at Village Elementary is five, with three instructional assistants in each classroom. This means that each classroom has four staff and five students, which is much higher than the SSC guidelines. Coronado Middle School has a much higher ratio than recommended, with seven students and four instructional assistants compared to SSC's recommendation of 8-10 students and two instructional assistants.

Coronado Unified's moderate to severe SDC (nonseverely handicapped) is composed of students similar to those in a SSC developmentally delayed SDC, which has a guideline of 10-12 students and two instructional assistants per classroom. Coronado Middle School SDC has nine students, which is lower than recommended and four instructional assistants, which is much higher. Coronado High has 13 students and two instructional assistants and is within the recommended guideline.

A number of inefficiencies and overstaffing exist in moderate to severe SDCs. Decreasing the number of moderate to severe teachers at Village Elementary by one could result in a cost savings of approximately \$72,943 in average salary, statutory and health/welfare benefits. The number of instructional assistants at Village Elementary could be reduced to three (depending on the severity of student needs) for a cost savings of \$98,517, including statutory and health/welfare benefits. Coronado Middle School could reduce the number of instructional assistants by four to

align with SSC, yielding an additional approximate cost savings of \$131,356, including statutory and health/welfare benefits. These calculations are based on the averages of the staff salary and benefits provided by the district.

The district lacks written guidelines for deciding when to grant requests for additional instructional assistants and does not use “fading” plans to reduce and discontinue these services. This is likely to contribute to the high number of instructional assistants assigned to moderate to severe programs.

Recommendations

The district should:

1. Consider reducing the number of moderate to severe teachers at Village Elementary to align more closely with SSC recommended guidelines.
2. Consider reducing the number of instructional assistants at Village Elementary and Coronado Middle School assigned to moderate to severe classes to more closely align with SSC recommended guidelines.
3. Consider developing guidelines to justify the addition of instructional assistants and fading plans for these services.

Mild to Moderate Special Day Class/Resource Caseloads

The district has created flexible programming options for students to be placed in the appropriate classes to address their specific level of need. Students may have a combination of resource classes, nonsevere SDC classes, and general education classes throughout their day depending on each student’s unique needs.

The district has also elected to combine teacher caseloads to include both resource program and nonsevere special day class students. It has developed a weighted formula to calculate caseload size based on percentage of services to students, which is expressed as a student full-time equivalent (FTE). The district-provided data was used to compare the student service FTE to the teacher FTE to determine whether each teacher has a caseload that is appropriate, too high or too low. The following table provides a summary of the teacher caseloads based on the district formula.

Mild to Moderate Caseloads

Site	Teacher FTE	Caseload	Student FTE	IAs
	1.0	19	.77	1
Village	1.0	23	.82	1
Strand	1.0	10	.39	1
	1.0	14	.50	1
	1.0	19	.68	1
CMS	1.0	17	.61	1
	1.0	19	.73	1
	1.0	14	.59	1
	1.0	17	.64	1
	1.0	16	.59	1
CHS	1.0	22	.81	1

Source: Coronado Unified School District

According to the data in the above table, none of the mild to moderate teachers carry caseloads that are commensurate with their teaching FTEs. One teacher has a caseload of 10, which the district indicated represents a .39 student FTE of service provision/case management. Most teachers carry caseloads within the .50 to .68 range, indicating that they provide far less case management and service than they are hired to provide as full-time teachers. This is an area of substantial inefficiency.

Six full-time teachers at the high school case manage 88 students. An examination of high school teacher's schedules found that five teach one to three study skills classes for a total of 11 of these classes daily. This suggests small numbers of students in each class.

The staffing ratios for Strand Elementary, Coronado Middle School and Coronado High School are much lower than Education Code (EC) guidelines, which represents significant inefficiency and warrants staffing reductions. Mild to moderate teachers can carry caseloads of up to 28 students according to EC 56362. If the district aligned teacher caseloads closer to 28, it could reduce the number of teachers at the high school from five to three for a potential cost savings of approximately \$145,884 in salaries and statutory and health/welfare benefits. The middle school could reduce by one teacher for a potential savings of approximately \$72,942, including salary and statutory and health/welfare benefits.

In addition to the high number of teachers in the mild to moderate programs, each teacher is assigned a 6-hour instructional assistant. Many districts hire part-time instructional assistants for mild to moderate programs depending on the service delivery model. Education Code 56362(6) (f) states that, "At least 80 percent of the resource specialists within a local plan shall be provided with an instructional aide" The Education Code does not delineate whether instructional aides should be full-time or part-time. The district should consider reducing the number of instructional assistants assigned to mild to moderate programs and reducing a portion of them to part-time instead of full-time.

Recommendations

The district should:

1. Consider aligning mild/moderate teacher caseloads with Education Code maximums for resource teachers (1-to-28).

2. Consider reducing the number of mild/moderate teachers to increase efficiency.
3. Consider reducing the number of instructional assistants assigned to mild/moderate teachers.

Designated Instructional Services (DIS)

The Special Education Department reported that it does not use specific guidelines or the Education Code to determine designated instructional services caseloads.

Speech and Language Pathologist

District caseloads for speech and language pathologists (SLPs) were compared to the Education Code maximums and are outlined in the following table. Under EC 56363.3, “The average caseload for language, speech and hearing specialists in special education local plan areas shall not exceed 55 cases, unless the local plan specifies a higher average caseload and the reasons for the greater average caseload.” Education Code 56441.7 requires a specific caseload maximum of 40 students between the ages of three and five years inclusive.

Coronado has a total of five SLPs.

Speech and Language Pathologist Caseload Comparison

Provider	District Total Caseload Ratio (Total FTE to Total Student Caseload)	District Average Caseload Ratio	Ed. Code Ratio (FTE to Student Caseload)
Speech-Language Pathologist (SLP) (K-12 caseload)	3:158	1:53	1:55

Source: EC 56363.3 and Coronado Unified School District

Three SLPs serve kindergarten through 12th grade students and no preschool students. The average caseload per SLP was based on manual data that was provided by the Special Education Department. The Special Education Information System (SEIS) generated data that indicated a slightly lower numbers of students than the manually generated data. Using SEIS as the primary reference, the SLP caseload data indicated an average of 53 students per SLP and is below the Education Code average of 55.

SLP Combined Caseloads

SLP FTE	Total Caseload	Preschool Caseload	% FTE needed to serve based on Ed. Code maximum of 40 (Preschool)	K-12 Caseload	% FTE needed to serve based on Ed. Code maximum of 55 (K-12)	Total % FTE needed to serve based on Ed. Code
1.0	42	24	.60	18	.33	.93
1.0	51	2	.05	49	.90	.95

Source: EC 56441.7 and Coronado Unified School District

Two SLPs have combined caseloads of preschool and K-12 students. The above table shows the number of FTEs needed to serve the number of preschool students and K-12 students on each

SLP's caseload. It also indicates the total FTE needed to serve the total number of students to comply with Education Code. One SLP has a combined caseload that would require a .93 FTE SLP, and the second a caseload that could be served by a .95 FTE SLP. This analysis indicates that both SLPs with combined caseloads have the capacity to slightly increase them. Preschool numbers will fluctuate throughout the school year since eligibility in speech is established immediately following the third birthday for disabled students. For that reason, blended preschool and K-12 speech caseloads should be closely monitored monthly to ensure efficiency and compliance.

Although SLP caseloads are not significantly lower than the Education Code average, the district should evaluate the number of students identified as speech/language impaired (SLI). According to the district CASEMIS data for December 2012, 138 students were identified as SLI or 39% of the district students eligible for special education.

Identifying too many students as SLI could result in the use of more speech and language pathologists than necessary. The district should evaluate its SLI assessment and identification process to ensure that only students who meet special education SLI criteria and exhibit a need for special education services receive IEPs. Reducing the number of students identified for special education under SLI could decrease the overall number of SLPs. According to SLP salaries provided by the district, the average SLP salary and health/welfare benefits is \$88,008 including statutory and health/welfare benefits.

Staff indicated that the use of communication severity scales has helped to maintain the district's growing caseloads of students receiving speech services. These scales are guidelines used by the IEP team in determining the type, frequency, duration, and location of speech and language services. The guidelines help districts with individualized determination of therapy services, concerns with students missing classroom instruction, consistent identification and needs of English language learners. Despite the use of these scales, students identified on speech caseloads continue to be high.

Overall, SLP caseloads are not significantly below Education Code guidelines. However, the slightly lower caseloads combined with the possible overidentification of SLI students suggest that the district should reduce SLP services. If the district adjusted its assessment and identification practices and lowered the number of SLI students, it could decrease the number of SLPs needed over time.

School Psychologists

Staff indicated that the school psychologists were once housed at the district office, but now work at the school sites, which has been much more effective. The following table indicates the district school psychologist staffing ratio compared to the statewide average established by CalEdFacts (2010-11), which is a compilation of statistics and information on a variety of issues concerning education in California. The CalEdFacts guideline ratio is based on an average ratio of school psychologist staffing to general education enrollment across the state. The average school psychologist ratio across California is 1-to-1,466. According to district data, school psychologist caseload averages for Coronado Unified are one school psychologist to 1,059 students. Therefore, district psychologists have caseloads that are approximately 30% lower than the average of other districts in California. Coronado Unified could remain within the CalEdFacts guideline by reducing the number of school psychologists by one, yielding an approximate cost savings of \$79,916 in statutory salary and health/welfare benefits based on the salary information for school psychologists provided by the district. In addition to the cost of the three school psychologist's regular salary, one school psychologist receives an additional 7% of his or her annual salary for holding a secondary degree and two psychologists receive an additional .20 FTE salary for serving as coordinators. The combined stipends for the two psychologists were discussed in a previous section.

Coronado Unified School Psychologist Caseload Comparison

Provider	FTEs by Category	District Enrollment	District Ratio	CalEdFacts Staffing Ratio
School Psychologists	3 FTEs	3,176	1-to-1,059	1-to-1,466

Source: *California Education Facts (CalEdFacts) 2010-11 and Coronado Unified School District*

The ratio established by CalEdFacts is based on school psychologists serving in a traditional role, providing the complete spectrum of supports and services such as assessment, behavior support, consultation and counseling. The educationally related mental health services staff provide individual counseling, group counseling and case management for students with mental health issues and who require intensive behavior support. This relieves the three regular school psychologists of most counseling responsibilities. The regular school psychologists maintain case management responsibilities for six students who are placed at NPSs. Even with this additional NPS student responsibility, the district could decrease the number of regular school psychologists by one and maintain reasonable workloads.

Adaptive Physical Education (APE) and Occupational Therapy (OT)

The Education Code does not indicate maximum caseloads for the designated instruction services (DIS) providers listed in the following table; however, SSC has developed recommended caseload guidelines using data collected throughout the state. These guidelines are used as the standard of practice for efficient special education staffing.

The caseloads for DIS providers in the following table indicate that adaptive physical education teachers have lower caseloads than the SSC guidelines. The APE teacher caseload of 26 requires a .50 FTE to serve the students identified as requiring APE. The district schools are close to each other, so little travel is required in this assignment. This is an area of inefficiency, and the district should consider reducing at least .50 FTE for this position for an annual cost savings of \$72,943.

Designated Instructional Service (DIS) Provider Caseload Comparison

Provider	District Total Caseload Ratio (Total FTE to Total Student Caseload)	District Average Caseload Ratio	SSC Guideline Ratio (FTE to Student Caseload)
Adaptive Physical Education (APE)	1:26 1:6:74 (.60:45) (1:29)	1:26 1:46	1:45-55
Occupational Therapists (OT)			1:10-30

Source: *School Services of California (2011) and Coronado Unified School District*

The district employs a 1.0 FTE OT and the SELPA provides a .60 FTE OT to deliver services for Coronado Unified students. The SSC guidelines establish caseload maximums of 10-30 for occupational therapists (OT). It is not uncommon for OTs providing services in the schools to have caseloads that exceed the SSC guideline and maintain a manageable workload. Although the overall caseload ratio is one OT to 46 students, a review of individual caseloads found that one SELPA OT has a caseload of 45 students compared to the district OT, who has only 29. The district average caseload of 46 students is reasonable; however, redistributing caseloads between the two OTs would allow each to have a proportionate amount of the total students based on their FTE.

Assistive Technology

Two teachers with .20 FTEs each complete assistive technology assessments and provide services; one is a speech and language pathologist and the other is an occupational therapist. These two teachers work a 6/5 contract and receive an additional .20 of compensation beyond their regular contract to serve as coordinators, which costs the district an additional \$34,129 per year including salary and benefits. One teacher also receives an additional 7% annual salary stipend of \$1,211.26 including benefits, for holding an additional degree. Three students receive direct services, and 34 students require consultation. This school year, the team has completed six evaluations, with three open. Staff indicated that during the week, they work seven to eight additional hours that are outside the typical day. Coronado Unified uses an assistive technology flowchart to determine if these services are needed.

One cost saving measure is to shift assistive technology assessments and consultation to the speech therapists with the support of the OT when needed. These responsibilities can be incorporated into their assignment, especially for therapists with lower caseloads. Many districts provide assistive technology support in this manner. An adjustment of this service delivery option could yield as much as \$214,646 in savings through reductions in salary and statutory and health/welfare benefits.

Nurses and Licensed Vocational Nurses (LVNs)

The district contracts with Premier Healthcare Services, a nonpublic agency (NPA), for nursing services of an LVN at \$40 per hour as needed. The district has one school nurse. It is often more cost-effective to contract for services instead of hiring staff, especially in small districts like Coronado Unified.

Workability/Transition

In addition to the moderate to severe high school teacher staff, one full-time high school teacher serves as coordinator of the Workability program. This teacher has a 6/5 contract, which means she is paid for a regular 5-day week and an additional .20 FTE for serving as coordinator. This teacher has a 6-hour instructional assistant and is case manager to one student, according to district-provided data. The average class size for moderate to severe classes is eight to 10 as recommended by SSC guidelines. It is not cost-effective for the district to maintain a class with one student and a full-time teacher. The district should explore options to link with another district's transition age program until it has the capacity to fund its own class with eight to 10 students. The district could realize a staffing reduction of 1 FTE moderate to severe teacher at a savings of \$72,943 and one 6-hour aide \$32,839, including salary and statutory and health/welfare benefits. This would allow it to reallocate the Workability grant funds and increase student subsidized pay.

Recommendations

The district should:

1. Consider examining assessment and identification practices under SLI eligibility and reducing the number of students eligible for special education under this condition over time.

2. Consider reducing the number of school psychologists to align it more closely with the CalEdFacts ratio.
3. Consider reducing the APE teacher FTE to .50 to align with the caseload of students requiring APE services.
4. Redistribute OT caseloads so that they are proportionate to each OT's FTE.
5. Consider training the SLPs to conduct assistive technology assessments and provide consultation, and eliminate the stipends given to other providers to serve in this role.
6. Consider assigning the Workability coordination responsibilities to a high school teacher with a lower caseload and eliminating this position.
7. Consider reallocating the Workability grant funds, increasing student subsidized pay and decreasing certificated and classified salaries.

Internal Controls

The Special Education Department manually monitors special education staffing levels, including teacher placement and caseloads, itinerant placement and caseloads, and instructional assistant assignments. The department staff has developed a Microsoft Word document that contains a table with all special education certificated and classified staff identified. Information is manually gathered from several sources and hand-entered into the document at the beginning of the school year. The district has no official procedure for maintaining the accuracy of this master staffing list. Staff reported that the list is updated periodically, but no specific timeline was evident.

In addition to the master staffing list maintained manually by the Special Education Department, the Human Resources and Business Services departments maintain their own separate lists of staff and their assignments. Each list is maintained manually and independently of the others. However, discrepancies in staff and their assignments (classified and certificated) exist between lists. For example, the Human Resources list does not track caseload information while the Special Education list does. The Business Services list tracks the assignment of instructional assistants using FTE language, while the Human Resources and Special Education departments use hours language to define instructional assistant assignments.

The system used to monitor special education staffing and track caseloads is old and inefficient. Manually entering data gathered from a variety of sources is time consuming and leads to risk of human error and incorrect data. Each department acts independently of the others in maintaining its own staffing list, which can cause confusion related to program implementation and ultimately affect the district's financial resources. Manually maintaining master staffing lists also interferes with the district's ability to continuously monitor staffing and caseload levels over time.

During the school year, the district does not consistently use a systematic interdepartmental method for identifying, tracking, and adjusting staffing levels, which is often referred to as a position control system. As a result, there is no indication that staffing assignments are periodically adjusted in an efficient, fiscally responsible manner as student needs change.

The district recently transitioned to a new IEP information management system called SEIS (Special Education Information Systems). This is the most widely used IEP management system in California. Full utilization of this system will enable the district to track staffing levels and individual staff caseloads efficiently and accurately. However, the site administration has not been trained in the system's use. Monitoring the use of the SEIS has been left to the certificated staff and coordinators assigned to each school.

Recommendations

The district should:

1. Develop an automated position control system that is articulated between and among departments (Student Services, Human Resources, and Business Services) to identify staffing assignments, monitor caseloads, and facilitate staffing adjustments as student needs change throughout the year.
2. Ensure that SEIS and the district's student information system (Synergy) are connected to cross-reference staffing and student placement.

3. Train school site office and special education staff in the accurate procedures for IEP-related data entry in SEIS.
4. Develop monthly automated staffing/caseload reports to be used in making staffing adjustments as appropriate by school site.
5. Establish monthly interdepartmental meetings to review the staffing/caseload reports and make adjustments as necessary.
6. Establish clear criteria for staffing/caseload levels for each certificated and classified position.
7. Establish an official procedure for increasing and/or reducing staff based on clear criteria for staffing and caseloads.
8. Provide the site administration with initial and ongoing training in using the SEIS to monitor IEPs and track caseloads.

1-to-1 Instructional Assistants

A thorough review of staffing lists provided by the Student Services, Human Resources, and Business Services departments as well as interviews of more than 20 staff members found that the number of one-to-one instructional assistants used in the district is unclear. According to staffing lists from each department, between 39 and 40 instructional assistants are employed districtwide. However, there is a discrepancy of one instructional assistant between the staffing lists of the Student Services and the Human Resources departments. According to the staffing lists provided, half of these (20) are employed as standard instructional assistants based on the job description/class specification of instructional assistant approved by the school board in August 1983. The other half (between 19 and 20) are classified as instructional health care assistants as approved by the school board in June 1994. The district does not have a job description/class specification for a one-to-one instructional assistant.

While no official job description/class specification exists for a one-to-one instructional assistant, one parenthetical reference to this position appears on the student services staffing list, and two references on the human resources list. The one-to-one instructional assistant references do not match between departments. There is no reference to one-to-one instructional assistants on the staffing list provided by the Business Services Department. During interviews with more than 20 staff members, the estimated total number of one-to-one instructional assistants varied by one to five.

The district does not have a formal policy, procedure or criteria for identifying, placing, and “fading” the use of a one-to-one instructional assistant. Staff interviews found that these processes occur informally and on an individual basis during the IEP team meeting. Some staff indicated the district recently reduced the number of instructional assistants through fading; however, no official written record was available of this staffing adjustment.

Using an informal process to identify, place, and fade a one-to-one instructional assistant creates confusion among staff and parents about the level of support the instructional assistant provides and the duration of the assignment. The lack of clearly defined policies and procedures for these instructional assistants also creates ambiguity about the fiscal impact of these positions on the budget.

Recommendations

The district should:

1. Develop and implement a district policy and procedures for identifying, placing, tracking, and fading one-to-one instructional assistants based on student need.
2. Consider using language such as special circumstances instructional assistants instead of one-to-one instructional assistants.
3. Develop an automated position control system that is articulated between and among departments (Student Services, Human Resources, and Business Services) to identify the total number of one-to-one instructional assistants districtwide.

4. Provide mandatory training for all special education staff and site administration in following the district policy and procedures related to identifying, placing, tracking, and fading one-to-one instructional assistants based on student need.
5. Monitor the status of the student response to the one-to-one instructional assistant in an effort to fade the support and return the student to a less restrictive environment.
6. Provide initial and ongoing professional development to one-to-one instructional assistants to ensure high quality student support related to behavior, academics, and/or health.

Nonpublic Schools/Agencies, Mental Health Services and Alternative Programs

When reviewing the special education budget for efficiency, one important factor is how the initial budget is developed and monitored. Close communication between the Business and Special Education departments is essential to ensure that the initial budget contains accurate projections for income and tracking of expenditures. Special education has never been part of a process of budget development; however, district administration indicated that for the 2014-15 school year, all departments and school sites will participate in developing district and site budgets. In addition, the district has no effective tracking systems for nonpublic school/agency expenditures.

Nonpublic Schools/Agencies

Education Code 56034 states the following:

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 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 South County SELPA provides master contracts for nonpublic schools and individual service agreements for the students served in them. The contract specifies when the NPS is paid for absences, but does not specify the number of days an NPS can operate an extended school year program. Each individual district negotiates with the NPS regarding the number of extended school year days. The schools listed in the following table have a 30-day extended school year program while most districts operate 20-day programs. By reducing this program as appropriately determined by the IEP team for each student, the district would realize a savings of \$6,588.

District operating procedures for special education (2009) indicated that the IEP team determines the need for a student to attend a nonpublic school or continue in an NPS placement; however, they do not include guidelines for IEP teams on the criteria to make such a decision.

Seven students are enrolled in nonpublic schools during the 2013-14 school year. The district does not have the capacity or nonpublic school enrollment to provide district programs for these students, and the San Diego County Office of Education does not operate special education programs.

Nonpublic School Contracts and Annual Costs for 2013-14

Student	School	Cost
#1	Banyon Tree	\$55,650
#3	Winston School	\$27,567
#4	Winston School	\$27,567
#5	Winston School	\$27,567
Total		\$138,351

Source: Documents reported by special education (2013) excluding transportation costs

The district tracks NPA costs in the same Excel report, making it difficult to sort individual student expenses, which are sometimes reported individually or combined with those of other students. The total nonpublic agency expenses for 2011-12 were \$62,699, 95 of which included independent evaluations, bilingual education evaluations, vision therapy services, etc. The expenses for 2012-13 were not available at the time of fieldwork for this study.

FCMAT found a number of additional per-student expenses embedded in the nonpublic agency report that may actually be independent contractors instead of nonpublic agencies, including the following:

Individual Therapeutic Homework	\$27,150
Inclusive Education	\$23,245
Tutoring	\$26,990
Nursing	\$70,129
Transitional	\$13,618

The district should develop a systematic way of tracking nonpublic agency and independent contractor expenses. Most districts create a line item in the budget for each category such as nonpublic schools, nonpublic agencies, and independent contractors. There should be greater articulation and communication between the Business and Special Education departments on these expenditures.

Mental Health Services

The district receives funding to provide educationally related mental health services to students in district programs. These funds must be used to fund programs and/or services to support the mental health related needs of students although there is some flexibility in how these dollars may be utilized. To provide educationally related mental health services to students, the district funds a full-time social worker to provide individual and group counseling and a .25 FTE board certified behavior analyst to provide case management for counseling students. These two staff have a caseload of 31 students. There is no statutory caseload requirements for these positions in educationally related mental health services.

The cost of residential NPS placements has significantly increased because county mental health is no longer responsible for the student's room and board or the mental health counseling following implementation of Assembly Bill (AB) 114. The South County SELPA has developed an allocation plan with the member districts for distributing these mental health funds.

Educationally related mental health services funds received from the SELPA under the specific category of mental health in 2013-14 are \$178,000; however, the total cost of mental health services including the costs of residential placements is \$401,000. The revenue received in some years may not be sufficient to cover the cost of the district staff that is required to provide mental health services. For example, in 2013-14 educationally related mental health services is over budget by \$223,000, which increases the unrestricted general fund contribution.

The district should evaluate the staffing level of a full-time social worker and .25 case manager and determine whether reductions can be made.

Alternative Programs

Workability is a nationally recognized school to work program that provides pre-employment training, job placement and follow up for middle school and high school disabled students who are making the transition from school to work. Funding is provided through grants to school districts through the California Department of Education. The Workability grant for the 2013-14 school year is \$56,252.

Workability is generally expected to be self-sustaining, that is, only the amount received in revenue is expected to be expended to operate the program. The current expenditures are estimated at \$84,088, which exceeds the grant award by \$27,836. The district should review all expenditures in the Workability grant and determine the options to decrease costs to align with the grant award amount in the 2013-14 school year.

Recommendations

The district should:

1. Consider updating special education operation procedures to include specific guidelines for IEP teams that define the criteria for placement in restrictive environments such as outside the district in regional or nonpublic school classes.
2. Consider reducing the number of extended school year days in nonpublic schools by 10 to align with public school districts in San Diego County as appropriate.
3. Align the Workability budget for 2013-14 with the amount awarded to eliminate the encroachment of this grant on the unrestricted general fund.
4. Separate resource codes are used for any specialized programs such as Workability and educationally related mental health as required by the California School Accounting Manual to enable the district to monitor the expenses for these programs and to make specific adjustments to programs as needed.
5. Review caseloads for the full-time social worker and .25 case manager and determine if reductions can be made until program caseload and capacity is reached.
6. Establish a protocol between the Special Education and Business departments to track expenditures separately for nonpublic schools, nonpublic agencies and independent contractors.
7. Foster close communication between the Business and Special Education departments to ensure that the initial budget contains accurate projections for income and the tracking of expenditures. Special education has never been part of a process of budget development.

Due Process

Under Education Code 56501, a due process hearing may be initiated under the following conditions:

- (a)(1) There is a proposal to initiate or change the identification, assessment or education placement of the child or the provision of a free appropriate public education to the child.
- (2) There is a refusal to initiate or change the identification, assessment or education placement of the child or the provision of a free appropriate public education to the child.
- (3) The parent or guardian refuses to consent to an assessment of the child.
- (4) There is a disagreement between a parent or guardian and a local educational agency regarding the availability of a program appropriate for the child, including the question of financial responsibility, as specified in Section 300.148 of Title 34 of the Code of Federal Regulations.

The district does not track every potential or actual filing, school/program involved, issue addressed, resolution or resulting due process cost. The assistant superintendent of student services is familiar with these facts; however, without documentation, this assistant superintendent and the Business Services Department may lack sufficient information to make the appropriate budget, programmatic or instructional adjustments.

The Business Department tracks the attorney fees paid for district representation in due process matters, which totaled \$141,912 for the 2012-13 school year. The Special Education Department has included other due process costs such as parent attorney fees, reimbursements to parents for education services, and additional services offered by the district in resolution meetings in the nonpublic agency budget. The total figure for this expenditure for 2011-12 was \$137,000. The NPA budget figures for 2012-13 were not available at the time of fieldwork for this study. This is not an appropriate category for these expenditures and further complicates the ability of the Business Department and superintendent to track due process expenditures. The district should develop a tracking system for all due process cases that includes the following:

1. Student name, school, and case number (if a formal due process has been filed).
2. Identification of the issue: eligibility, placement, assessment, FAPE.
3. Identification of the level of due process: Resolution meeting, mediation, due process hearing (a separate file should be maintained for cases which are problematic but considered pre due process filings for which the district incurred additional costs).
4. The outcome (open, resolved, withdrawn, closed) with any mediated agreements attached.
5. The district's attorney fees, if any.
6. The parent attorney fees paid out.
7. Reimbursements to parents for education services (clearly specified).
8. New services agreed to as part of a settlement.
9. Other: Additional agreements as part of a settlement.

This review should be prepared by the assistant superintendent of student services and must include all supporting documents: attorney invoices, mediated agreements, hearing decisions, etc. The document should be reviewed in superintendent's cabinet so that all members are aware of the due process costs, particularly those that are resolved with some costs prior to a formal due process hearing.

The board should receive a summary of due process costs at least annually.

Recommendations

The district should:

1. Develop a spreadsheet to include all pertinent areas of potential and actual due process filings, as well as any complaints that may be filed, so costs can be tracked, issues determined and remediated.
2. Provide this spreadsheet to the Business Department and superintendent at least monthly so the special education budget can be adjusted as needed.
3. Ensure the board receives a summary of due process costs at least annually.

Appendix

A: Study Agreement

Appendix A - Study Agreement

FCMAT

FISCAL CRISIS & MANAGEMENT
ASSISTANCE TEAM

CSIS California School Information Services

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM STUDY AGREEMENT June 26, 2013

The Fiscal Crisis and Management Assistance Team (FCMAT), hereinafter referred to as the team, and the Coronado Unified School District, hereinafter referred to as the district, mutually agree as follows:

1. BASIS OF AGREEMENT

The team provides a variety of services to school districts and county offices of education upon request. The district has requested that the team assign professionals to study specific aspects of the Coronado Unified School District's operations. These professionals may include staff of the team, county offices of education, school districts, or private contractors. All work shall be performed in accordance with the terms and conditions of this agreement.

In keeping with the provisions of Assembly Bill 1200, the county superintendent will be notified of this agreement between the district and FCMAT and will receive a copy of the final report. The final report will also be published on the FCMAT website.

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

The scope and objectives of this study are to:

1. Determine the district's general fund contribution to special education and make recommendations for greater efficiency.
2. Provide an analysis of staffing ratios and class load sizes using statutory requirements for mandated services and statewide guidelines.
3. Provide an analysis of all staffing and caseload sizes for related service providers including psychologists, occupational and physical therapists, behavior specialists etc.
4. Review the SELPA allocation model and any options for revenue generation.
5. Review internal the controls used to monitor staffing levels.

6. Meet the maintenance of effort (MOE) and options for adjusting the MOE
7. Review the use of resources allocated for nonpublic schools and agencies, mental health services and alternative programs, and make recommendations for greater efficiency.
8. Review the costs of due process and mediations over the past three years.
9. Review the efficiency of staffing for 1:1 instructional aides. Analyze procedures for the identification, building independence and the process for monitoring the use of resources.

B. Services and Products to be Provided

1. Orientation Meeting - The team will conduct an orientation session at the district to brief district management and supervisory personnel on the team's procedures and the purpose and schedule of the study.
2. On-site Review - The team will conduct an on-site review at the district office and at school sites if necessary.
3. Exit Report - The team will hold an exit meeting at the conclusion of the on-site review to inform the district of significant findings and recommendations to that point.
4. Exit Letter – Approximately 10 days after the exit meeting, the team will issue an exit letter briefly summarizing significant findings and recommendations to date and memorializing the topics discussed in the exit meeting.
5. Draft Reports - Electronic copies of a preliminary draft report will be delivered to the district's administration for review and comment.
6. Final Report - Electronic copies of the final report will be delivered to the district's administration and to the county superintendent following completion of the review. Printed copies are available from FCMAT upon request.
7. Follow-Up Support – If requested, FCMAT will return to the district at no cost six months after completion of the study to assess the district's progress in implementing the recommendations included in the report. This progress in will be documented for the district in a FCMAT management letter.

3. PROJECT PERSONNEL

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

- | | |
|--------------------------|---|
| A. Dr. William Gillaspie | FCMAT Deputy Administrative Officer, Project Lead |
| B. Joann Murphy | FCMAT Consultant |
| C. Trina Frazier | FCMAT Consultant |

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

4. **PROJECT COSTS**

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

- A. \$500 per day for each staff member while on site, conducting fieldwork at other locations, preparing and presenting reports, or participating in meetings. The cost of independent FCMAT consultants will be billed at their actual daily rate.
- B. All out-of-pocket expenses, including travel, meals and lodging.
- C. The district will be invoiced at actual costs, with 50% of the estimated cost due following the completion of the on-site review and the remaining amount due upon the district's acceptance of the final report.

Based on the elements noted in section 2 A, the total estimated cost of the study will be \$20,000.

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

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

5. **RESPONSIBILITIES OF THE DISTRICT**

- A. The district will provide office and conference room space during on-site reviews.
- B. The district will provide the following if requested:
 - 1. A map of the local area.
 - 2. Existing policies, regulations and prior reports that address the study scope.
 - 3. Current or proposed organizational charts.
 - 4. Current and two prior years' audit reports.
 - 5. Any documents requested on a supplemental list. Documents requested on the supplemental list should be provided to FCMAT only in electronic format; if only hard copies are available, they should be scanned by the district and sent to FCMAT in electronic format.
 - 6. Documents should be provided in advance of fieldwork; any delay in the receipt of the requested documents may affect the start date of the project. Upon approval of the signed study agreement, access will be provided to FCMAT's online SharePoint document repository, where the district will upload all requested documents.

- C. The district's administration will review a preliminary draft copy of the report resulting from the study. Any comments regarding the accuracy of the data presented in the report or the practicability of the recommendations will be reviewed with the team prior to completion of the final report.

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

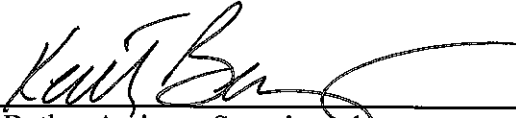
6. PROJECT SCHEDULE

The following schedule outlines the planned completion dates for different phases of the study:


Orientation:	December 9, 2013
Staff Interviews:	December 9-12, 2013
Exit Meeting:	December 12, 2013
Preliminary Report Submitted:	to be determined
Final Report Submitted:	to be determined
Board Presentation:	to be determined, if requested
Follow-Up Support:	if requested

7. CONTACT PERSON

Name: Keith Butler, Assistant Superintendent
 Telephone: (619) 522-8900 x1016
 E-mail: kbutler@coronadousd.net



 Keith Butler, Assistant Superintendent
 Coronado Unified School District
 7/31/13
 Date



 Anthony L. Bridges, CFE
 Deputy Executive Officer
 Fiscal Crisis and Management Assistance Team
 July 26, 2013
 Date