

October 8, 2015

Sean McPhetridge, Ed.D., Superintendent
Alameda Unified School District
2060 Challenger Dr.
Alameda, CA 94501

Dear Superintendent McPhetridge:

In April 2015, the Alameda Unified School District entered into an agreement with the Fiscal Crisis and Management Information Team (FCMAT) for a special education technical assistance review. The study agreement requested the FCMAT perform the following:

1. Analyze the district's special education program funding and determine the proper accounting and uniform financial reporting format in accordance with the state's Standardized Account Code Structure (SACS).
2. Determine whether the district provides special education and related services at or above the legally mandated level.
3. Review staffing ratios and class load sizes using statutory requirements for mandated services and statewide guidelines.
4. Review the process for all staffing and caseload sizes for related service providers including but not limited to school psychologists, occupational and physical therapists and behavior specialists.
5. Review the procedures for identifying the need for instructional aides and building student independence, and the process for monitoring the use of instructional aides in classrooms and 1:1 assignments.
6. Analyze the district's process identifying students for special education and make recommendations for reduction, if any.

The purpose of this management letter is to provide the findings and recommendations developed by FCMAT in response to this request. FCMAT conducted staff interviews at the district office on September 22-23, 2015. The team also reviewed various documents collected before and during the visit. This management letter is the result of those efforts.

In writing its reports and letters, 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.

FCMAT

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Study Team

The study team was composed of the following members:

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*As a member of this study team, this consultant was not representing his respective employer but was working solely as an independent contractor for FCMAT. Each team member reviewed the draft report to confirm the accuracy and to achieve consensus on the final recommendations.

Background

The Alameda Unified School District has a student enrollment of 9,551 ages three to 22 served at a childhood development center, 10 elementary schools, two middle schools, two comprehensive high schools, a continuation school, an early college high school and an adult school. The district is one of five under the North Region Special Education Local Plan Area (SELPA).

The district requested a review of its special education program because of a rise in identification rates, staffing increase requests and intervention needs, which increase the contribution from the general education fund. This study is intended to provide an independent and external review of these services.

Funding and Account Structure

FCMAT analyzed the district's special education program funding to determine the proper accounting and uniform financial reporting format in accordance with the state's Standardized Account Code Structure (SACS).

FCMAT was primarily requested to determine the reasons the special education contribution for special education has continued to increase significantly over the past three years and develop strategies to control costs while maintaining an appropriate level of services to students. The district has an estimated operating budget of \$100 million for 2015-16, and the special education budget is \$21,194 million, or one-fifth of the overall budget.

The general contribution to the special education budget the past four years is as follows:

2012-13	\$9,010,717
2013-14	\$12,312,373
2014-15	\$12,605,910
2015-16	\$15,331,035

On average, the state's school districts contribute 43% of the special education budget from the general fund. Alameda Unified is contributing more than 60% in the 2015-16 school year.

During the FCMAT visit, district personnel expressed the desire to account for the amount of time special education personnel expend performing services that benefit the general education student population. Examples of these services include professional development provided by special education personnel for preintervention strategies (Tier 1 and Tier 2 systems of support), and intervention strategies for all students such as Positive Behavior Intervention Supports (PBIS). Tracking this time would allow for a more accurate accounting of special education services, and therefore a more accurate calculation of the contribution from the general fund to special education. However, there is no indication that the district has a system for special education personnel to track time spent on general education support.

District personnel also wanted to determine the cost of implementing an inclusion model for special education. This information could be used as another strategy to improve tracking. The district has no system for special education personnel to track the time spent on pilot projects, such as the staffing needed for learning centers used to support an inclusion model. Locally defined "program codes" are available in the district's financial system for this purpose. The Education Services Department has adopted numerous program codes, but the Special Education Department has used them infrequently. Increasing the use of these codes would facilitate analysis of the cost-effectiveness of pilot projects.

In conjunction with Business Services, the Special Education Department should develop a system for special education personnel to track the time spent on general education support. The assistant of superintendent of educational should provide direction on this implementation. The data from this system can be used to recode special education personnel time and charge general education for time spent on general education functions, resulting in a more accurate calculation of the contribution from the general fund to the special education program.

In addition, the Special Education Department, in conjunction with Business Services, should develop a system to track time spent on pilot projects, such as the learning centers used to support an inclusion model. The financial system has locally defined "program codes" for this purpose.

Position Control

Business Services and Human Resources regularly work together to monitor the special education full-time equivalent positions that have been approved and built into the district budget. Additionally, the district has a process for the cabinet to review any new special education positions; however, department staff are occasionally hired outside this system and without the proper approvals. There is a lack of communication between Special Education, Business Services, Human Resources, and Educational Services regarding budget development, monitoring and staffing. The departments work in an isolated manner, each doing independent work without systemic communication between them.

Special education has no system to monitor every service needed per IEP for each student in the district. Therefore, it is not possible to aggregate the services needed by type and school site to determine if districtwide resources are sufficient to meet documented needs. Lack of this information makes true position control impossible.

The potential expirations of services for each student are analyzed as a part of the development of an individualized education plan (IEP). This is often referred to as a "fade plan." However, many of those interviewed by FCMAT indicated these plans are either not used or not monitored. As a result, services are potentially continued when they are no longer needed.

The district has minimal institutional memory of any special education certificated or classified personnel layoffs that occurred because of services that were no longer needed for particular students. Over the last three years, the number of students identified as having a specific language impairment (SLI) and specific learning disability (SLD) has declined while those identified as autistic have increased, but no corresponding changes were made in personnel. Maintenance of effort (MOE) is the federal statutory requirement that with limited exceptions, a district must spend the same amount of state and local money on special education each year, but this provision does not require a district has to spend additional resources. Without appropriate reductions in services provides and/or personnel layoffs, the Special Education Department uses excess resources, efficiencies are not realized, and proper accounting to minimize the district's MOE requirement is not possible.

In conjunction with the Special Education Department, Business Services should develop a tracking system to monitor every service needed, per IEP, for each student. This data should then be aggregated by type of service and school site to determine if districtwide resources are sufficient to meet demonstrated special education resource needs. This tracking system should also include data on when services expire, and the expirations should be monitored to determine potential layoff notices and the resulting reductions in district special education maintenance of effort calculations.

Contribution from the General Fund to Special Education

The special education reporting methods of districts, county offices, and SELPAs 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 unrestricted general fund contribution to that of other districts. However, a district may still need to address an excessive or increasing unrestricted general fund contribution.

Interpretations of contribution amounts may differ even within a district. At Alameda Unified, special education utilizes figures calculated by the SELPA, Business Services uses data from a separate spreadsheet, and a third set of numbers is included in reporting to the state of California through SACS software and the Form Special Education Maintenance of Effort Report (SEMA). The three sources are reported as follows.

Alameda USD Contribution Percentages

Data from North Region SELPA special education Program Certification 2014-15

	2012-13	2013-14	2014-15 (projected)
Expenditures	\$17,464,051	\$19,210,190	\$20,296,198
General Fund Contribution	\$9,010,719	\$11,274,008	\$12,660,623
G.F. % of Expense	51.6%	58.7%	62.4%
Total North Region SELPA average G.F. % of Expense	53.8%	60.0%	57.9%

*Note: Alameda USD represents approximately 35% of total SELPA expenditures
Data from Alameda USD Business Services*

	2012-13	2013-14	2014-15	2015-16 (projected)
Expenditures	\$18,646,687	\$20,703,479	\$21,194,249	\$23,572,398
General Fund Contribution	\$9,010,717	\$12,312,374	\$12,605,910	\$15,331,035
G.F. % of Expense	48.3%	59.5%	59.5%	65.0%

Data from Alameda USD SEMA Reports; State & Local Expenditures

	2012-13	2013-14	2014-15
Expenditures	\$18,569,507	\$20,454,058	\$21,516,498
General Fund Contribution	\$8,957,658	\$11,171,178	\$11,464,808
G.F. % of Expense	48.2%	54.6%	53.3%

All three sources of data indicate contributions have increased since 2012-13. The LCFF was enacted with the passage of the 2013-14 Budget Act, replacing the previous K-12 finance system. Under the previous K-12 finance system, revenue generated by attendance in special day classes was transferred from the unrestricted general fund to the special education program.

Special day class ADA is no longer reported separately, and the California Department of Education (CDE) determined that this revenue limit special education ADA transfer will no longer occur. For many districts, implementation of the LCFF automatically increased the unrestricted general fund contribution to special education because of this accounting change. Additionally, effective in 2013-14, special education transportation revenue became an add-on to the LCFF and therefore is no longer restricted special education revenue. This change has also increased the amount of the unrestricted general fund contribution to special education for many districts, including Alameda Unified.

With support of Educational Services, Business Services and Special Education should agree to a common, consistent definition of the amount of contribution from the unrestricted general fund to special education. Once this is determined, the district should conduct an analysis covering at least three years to determine the sources of increasing special education costs and potential areas for expenditure reduction. Special Education, Business services, Educational Services and Human Resources should hold regular scheduled meetings. The agendas and minutes should be provided to the superintendent for staffing, budget development and monitoring purposes.

Special Education Transportation

Special education transportation costs have increased from \$941,129 in 2012-13 to \$1,866,877 in 2015-16 (budgeted). This does not appear to be the result of a rise in the number of students requiring transportation, but rather, the way the transportation provider, Durham School Services, has scheduled

additional routes. These added routes transport relatively the same number of students and result in the overidentification of those who may not need this related service. Several of those interviewed by FCMAT indicated the district does not appear to closely monitor the provision of transportation, implementation of the transportation contract, and any potential penalties to be paid by the transportation provider because of numerous service delivery issues. Approximately 13.8% of the 924 special education students in grades one through 12 utilize transportation services, a higher percentage than other districts that FCMAT has studied. The cost savings of reducing transportation services to within a 10% of identified students could be approximately \$900,000.

Although a full transportation study was not part of the scope of this site visit, the district should engage a detailed study of special education transportation that focuses on the following:

1. The percentage of students who are assigned transportation through the IEP process versus typical standards
2. Maximizing route efficiency
3. Implementing a system to document services delivered by the provider that are below standard
4. Guidelines to monitor adherence by the provider to the transportation contract
5. Potential language to include in any new contracts for special education transportation
6. The district personnel necessary to run a safe, efficient and compliant special education transportation program.

This may also include the recommendation that the transportation function be moved to the supervision of Business Services.

In the meantime, the Special Education Department should review IEPs to determine students who receive transportation but may not need this related service. The district should assign Business Services to monitor and assume responsibility for transportation and immediately discuss contract monitoring with Durham. Educational Services, Special Education, and Business Services should meet regularly during this transition, with the superintendent chairing the meetings.

District Service Delivery

The district provides services to students who have IEPs and are ages three to 22 in classrooms from preschool through transition (postsecondary). It provides services in the general education setting, learning centers, and self-contained special education classes, and includes out-of-district supports as required. The students receive services according to individual need, including but not limited to specialized academic instruction, speech and language therapy, physical therapy, occupational therapy, vision services, adapted physical education, and transportation, according to the Individuals with Disabilities Education Act (IDEA). Students matriculate from one grade to the next each year.

Although the special education coordinators work with case managers each spring to create a list for the following year's caseloads, the district does not have a formal practice to assist with the transition of students from one grade level to the next (specifically, preschool to kindergarten, elementary to middle and middle to high school). A formal written practice should be established for students and teachers for this purpose.

Although staff reported students and staff have equal access to the technology at their particular school sites, its availability depends on the financial supports provided through funding. These resources are based on whether the school qualifies for Title 1 and the level of contribution it receives from the Parent Teacher Association (PTA), which creates inequality. Staff lack training and supports to use technology in the classrooms for curriculum and as a means for accommodations and assistive technology. The district should consider developing a technology plan for classrooms with a strategic plan for enhanced technology at all school sites equally.

FCMAT reviewed the 2013-14 District Level Special Education Annual Performance Report Measure from the CDE website, which has been rebenchmarked with decreased percentage requirements. The district's 2013-14 report continued to show that it does not meet graduation rate for students with disabilities to receive a diploma; the target was 85%, but only 62% of these students graduated. Staff indicated that improving this percentage was discussed, but only support curriculum was provided. The district may need to consider additional pathways and courses for students to meet the diploma track requirements.

Inclusion should be introduced at the beginning of a child's education, yet the annual performance report indicated that more than half the district's preschool students are served in a separate learning environment. The district has a few included preschool environments, and staff is working towards providing additional opportunities. The district should continue to work towards preschool general education inclusion. Staff also reported that access to preschool playgrounds is inequitable, and students require adequate play equipment. Staff should regularly ensure equal access to all.

Thirty-nine district students are placed in nonpublic schools at an annual cost of more than \$1 million (although staff reported a decrease in the number of placements). The district should analyze the cost of these placements and determine the expense of creating high-level SDC classes so it can directly serve these students. When analyzing the cost, the district should include the potential decrease in transportation expenses.

Although many students have been returned to their neighborhood schools, the district did not adjust the level of support staff and services accordingly. This has created an impact on the general education staff and a need for additional training for the school staff, but no changes were made in response to these needs. The district should examine the levels of supports necessary for sites to be adequately provided with general and special education staff.

Staffing Ratios and Caseloads

The Special Education Department recently initiated a reorganization of special education support to students who receive mild/moderate services. This reorganization was primarily the result of two events: The CDE's local finding of disproportionality, and the professional development provided to the district on Response to Intervention (RtI2). A special education goal was established to ensure that students receive mild/moderate services under the framework of specialized academic instruction rather than in a resource specialist program (RSP) or a special day class (SDC). The reorganization also intended that students receiving mild/moderate services would attend their school of residence. This goal is consistent with the best practice in the field and recommendations from the Report of California's Statewide Task Force on special education (ONE SYSTEM: Reforming Education to Serve All Students, March 2015). In January 2013, district documents indicate it had five mild/moderate elementary SDCs, three middle school mild/moderate SDCs, and four high school mild/moderate SDCs. The number of mild/moderate SDCs has been significantly reduced. The previous mild/moderate SDC staff members were reassigned to

provide generic mild/moderate services without SDC designation. At the same time, an effort was made to implement some elements of RtI2 professional development on a school-by-school voluntary basis. Four schools began self-initiated implementation of a learning center approach to mild/moderate service delivery. The district also developed internal guidelines for special day class staffing and class size ratios. These guidelines are essentially consistent with industry standards across the state. To review staffing and caseload levels, FCMAT found it necessary to access multiple district-provided documents and ultimately request that some staffing and caseload information be arranged in new formats. The district should develop well-designed documents and, in coordination with other departments, consistently use that critical information to make well-informed staffing decisions and maintain a practical working knowledge and understanding of special education operation across all departments.

Virtually every group of staff members interviewed expressed some concern with the reorganization of mild/moderate services. For example, special education staff members indicated they had more difficulty meeting students' needs across a variety of settings. General education staff found that they did not receive professional development for the increased responsibility involved in meeting the needs of more involved special education students. Several sources across the state indicate that the success of a learning center approach is clearly connected to a shared responsibility between general education and special education in the delivery of Tier 1 and Tier 2 intervention services. Alameda Unified has not established a comprehensive commitment across all departments to provide leadership and actively support implementation of RtI2. Accordingly, the shift in mild/moderate services has lacked the instructional foundation that would help ensure success. Through the leadership of general education and special education, the district should design and implement a districtwide intervention model founded on the principals of RtI that will improve Tier 1 and Tier 2 intervention and support.

The caseload numbers for teachers providing moderate/severe services in an SDC setting are consistent with internal district guidelines and industry standards across the state. The caseload numbers for mild/moderate services vary widely across the entire district. The wide variation of caseload sizes and approaches to delivery across all grade levels suggests a lack of consistency, vision and district-level leadership from special education and general education in providing intervention and support for students with mild/moderate learning difficulties. Based on district-provided documents, 32.57 FTE teachers provide mild/moderate services to 630 students outside of an SDC model, reflecting an average caseload of 19.34 students per FTE. Increasing mild/moderate caseloads to the state-mandated maximum level of 28 students per FTE would result in 22.50 FTE necessary to serve the mild/moderate population. That staffing level could result in a decrease of 10.07 FTE and a reduction in cost of \$775,621.61. This review does not include a recommendation to make such a significant reduction in mild/moderate certificated staff based purely on a districtwide adjustment of caseload. Because of the high level of concern among all staff with the change in mild/moderate service, such a reduction would create significant distress and potential disruption of service to students. However, as part of the larger effort to redesign Tier 1 and Tier 2 intervention and support recommended above, the district should analyze the current allocation of mild/moderate certificated staff and the methodologies used to increase consistency and effectiveness in providing these services.

Related Service Providers

FCMAT reviewed the process for establishing staffing and caseload sizes for related service providers including school psychologists, occupational and physical therapists and behavior specialists.

District-provided documents included inconsistent information on staffing numbers, caseloads and allocations between the Special Education, Business and Human Resource departments. The district should

develop a consistent practice of review through in-person communication and one specialized document used by all the three departments. The three departments should meet regularly.

The school psychologists provide a range of general-education functions from consulting with general education teachers, attending and following up with 504 plans, working with positive behavioral intervention supports (PBIS) teams, performing scattered Tier 2 interventions under the special education umbrella, coordinating services teams (COST), assessing threats assessments, and writing community outreach grants. Special education supports include the usual initial, triennial assessments, IEP meeting attendance, and manifestation determination assessments and meeting attendance, but the psychologists also provide mental health counseling services, social skills group services, etc. Staff reports that about half of the psychologists' duties involve students in general education and half those in special education. Psychologist industry standards are determined by the total district population and would require Alameda Unified to employ 6.5 FTE. The district employs 10.6 FTE, which is 4.1 over the standard, at an annual cost of \$322,789. The district should first determine how it wants to utilize the psychologists since they provide more support to general education than other districts in the state, according to FCMAT observations. Once this determination is made, the district should budget the psychologist positions to reflect their use in general education. The district should also consider an open process and formula to determine FTE needs from year to year.

Although FCMAT has received several documents and emails trying to provide current data, the district does not use a method to track the number of students receiving speech services. It should develop a multidepartment spreadsheet for this purpose and update it weekly.

The Education Code limits speech and language caseloads to one teacher per 40 students for preschool and 1-to-55 for students in kindergarten through age 22. However, the district has allowed speech pathologists to have a caseload of 1-to-40 if they serve students in the moderate to severe classes, which increases costs. Preschool is served by 4.3 speech pathologists and requires only 2.5 FTE. Staff report caseloads may be a somewhat smaller at the start of the school year because children are identified and turn age three throughout the year. A .4 speech pathologist also provides administrative-type supports to the preschool; however, the district should consider transferring these duties to other positions and not additional staffing. For the K-22 caseloads, Alameda Unified has 9.5 FTE speech pathologists, and Education Code requires only 8.1 FTE. Some speech pathologists have begun to provide preinterventions to general education students, but the district has no formal process for this. If reductions were made to align FTEs with the Education Code, the district could save approximately \$261,878 per year.

Adaptive physical education (APE) teachers also have industry standards of 1-to 45-55 students per FTE. Using a 1-to-50 calculation, the district is overstaffed by 1 FTE. However, the APE teachers work with the preschool staff and a contracted physical therapist to provide APE provide support to preschool in lieu of the contracted physical therapy service. Staff reported that the cost of physical therapy contract decreased this year and eventually will result in a savings.

The Special Education Department includes a director, three coordinators, a part-time senior management support services, a teacher on special assignment, an assistive technology specialist, .4 support for preschool and three behavior specialists. All these positions support school-site staff, but have no direct caseloads. The district should discuss and analyze the special education organizational supports and determine duties, and efficiencies with allotment of staff. This staff may need to be utilized to assist with the implementation of districtwide RtI and therefore would be funded through general education. A district of this size would utilize a department administrative staff of approximately 3-4 administrative supports.

Paraeducator Staffing

The district document, “District Guidelines for Class Size Ratios” provides staffing ratios for paraeducators assigned to special day classes. The guidelines are consistent with industry standards across the state. As part of a salary review process for paraeducators, the district conducted a job study comparison of neighboring districts. This resulted in the establishment of three levels of paraeducator responsibility and training from academic support, to medical and personal assistance, to intense behavior support. The district utilizes a referral for special circumstances instructional (SCI) assistance to address requests for additional 1-to-1 support. The referral document also includes an independence plan that is to be completed at the same time as the SCI referral and updated through the IEP at least annually if a 1-to-1 paraeducator is assigned. The procedures include establishing a SCI assistance case manager to assist with SCI evaluation and implementation as required. Interviews with staff indicated that the SCI assistance referral procedure is widely used across the district, but not with 100% consistency. The independence plan component is less consistently used on initial SCI assistance referrals or updated for annual IEPs. Staff are also confused about who should serve as the SCI assistance case manager. The district should use appropriate administrative supervision to ensure that the SCI assistance referral procedures are applied consistently throughout the district. This should include identifying the SCI assistance case manager and completing the independence plan and its renewal through the IEP process. Staff indicated that additional paraeducator support was most frequently requested because of difficult student behavior. The district should continue district leadership and support for PBIS. Professional development in PBIS will assist with intervention for emerging student behavior problems, improve the use of staff resources and develop a culture of positive behavior that can affect even students with highly difficult behaviors.

Interviews indicated that paraeducators transfer between the position levels infrequently, and their original assignment locations rarely change. The district should develop a process (or fully inform staff if one already exists) that allows paraeducators to request a change in their assignments. The district should also develop a procedure to officially inform paraeducators at the point of hire that their job assignments may change based on administrative analysis of student and staff needs. Increased paraeducator movement will promote flexibility in assignments, which prioritizes service to students and more effectively uses personnel resources. Paraeducators receive some professional development annually. However, the training is typically insufficient to significantly improve their skills and is generic to the role rather than specific to the job or grade level. The district should provide a more thorough level of professional development for paraeducators that is specific to their assignments and calculated to improve critical job skills. (See “One-to-One Assistant Engagement In Autism Support Classrooms” Azad, Locke, et al, 2015 Teacher Education Division of the Council for Exceptional Children).

FCMAT found it difficult to identify a single definitive document used to track paraeducator assignments that is current, accurate and includes all essential information such as the supervising teacher, type of program, site, job level, student to be supported for 1-to-1 assistance, etc. A document is maintained by one clerical staff member in the Special Education Department, but its accuracy and current status is dependent on a variety of sources. The district should identify a clear line of management responsibility in the department to track, provide updates to the clerical paraeducator data list, and maintain site-level contact on the status of all paraeducator assignments. The district should consider assigning this function to one special education department manager.

Accurate documentation established that the district employs 38 1-to-1 paraeducators and additional support paraeducators. FCMAT calculated the average cost of paraeducators by combining job levels to establish one figure that includes salary and benefits. That cost is \$35,025 for each position per year for a combined average cost of \$1,330,950 for all 38 positions. An analysis of district documents also indicated 16 additional paraeducators are not assigned to 1-to-1 service at an average cost of \$560,400 per year. There is no indication that the district has a formal procedure to decide whether to grant additional paraeducator support that is not identified as 1-to-1 SCI assistance. The district should develop and consistently apply a process to determine the need for additional 1-to-1 paraeducators. A procedure should be developed to demonstrate that the Special Education Department has considered all possible changes in existing paraeducator positions before a request for additional paraeducator staff is considered for approval.

Preidentification

The overall identification rate for special education is within statewide averages, but is increasing and will soon exceed the average. RtI2 or MTSS provides districts with a method to drive educational decisions, measure academic growth, and meet the individual needs of students who do not respond to instructional strategies in general education. A Statewide Special Education Task Force report was recently initiated by Michael Kirst, President of the State Board of Education, and Linda Darling-Hammond, Chairwoman of the California Commission on Teacher Credentialing: One System: Reforming Education to Serve ALL Students (Report of California's Statewide Task Force on special education, 2015). This document indicates that a district's special education system should include preidentification services consisting of an MTSS. Alameda Unified does not have an RtI or MTSS. Almost every person and or group interviewed mentioned the lack of RtI, MTSS, inequalities and inconsistencies.

District office departments and school sites work in isolation. Because of the finding of disproportionality in special education, the Special Education Department took on the task of decreasing the identification of English learners through training, programs and curriculum. Although this is not an RtI program, it is almost all that exists besides PBIS. The district has also begun training and supporting the last cohort of school sites in PBIS, but it lacks the consistent options of interventions, common assessments, data collections, SST practices or procedures.

Interviews indicated the district's SST practices are inconsistent, likely resulting in different preidentification practices or interventions and assessment practices across sites. The California School Board Association (CSBA) provides guidance on SSTs and what school boards school boards throughout California should adopt. The district should ensure that the SST process includes comprehensive formal training and that guidelines and a handbook are provided to all school sites and included in the RtI2 system mentioned above.

The district should form leadership teams to develop an intensive strategic plan and a 3-5 year implementation plan for special education. These teams should involve the district office staff and initially include the superintendent, principals, general education teachers and parents. The plan should also be transparent and supported by the board. Related board policies should also be created.

A systemic change of this type should involve all staff and include the following:

- Timelines for formative assessment development and implementation, intervention curriculum adoption and implementation
- Progress monitoring tools and methodologies

- Data analysis strategies
- The implementation of norms continuing through the SST process and in the assessment for special education services.

This area should be a priority and include regular ongoing communication, meetings, and collaboration between the departments and school sites.

Conclusion

This technical assistance letter has outlined specific areas that the district can immediately address to improve the overall efficiency and effectiveness of the special education delivery system. Improvements can be made in all areas discussed. The district should outline priorities and establish a plan for implementation.

FCMAT thanks all staff and administrators of the Alameda Unified School District for their cooperation during fieldwork. We appreciate the opportunity to serve the district and hope that this letter is beneficial to all concerned.

Sincerely,

A handwritten signature in black ink that reads "William P. Gillaspie". The signature is written in a cursive style with a large, stylized initial "W".

William Gillaspie, Ed. D. Deputy Administrative Officer