

RIVERSIDE UNIFIED SCHOOL DISTRICT

SPECIAL EDUCATION REVIEW

PHASE ONE: Financial Audit

PHASE TWO: Comparative Data and Analysis

PHASE THREE: Program Delivery and Analysis



**TOTAL SCHOOL SOLUTIONS
4751 MANGELS BOULEVARD
FAIRFIELD, CA 94534**

January 2017

Table of Contents

Preface.....	1
Study Activities.....	1
Executive Study	2

PHASE ONE: Financial Audit

Preface.....	7
Program Revenue	
Introduction.....	7
State Resource Code 6500	8
State Resource Codes 6501 through 6535	9
Federal Resource Codes 3xxx's and 5640	12
Program Expenditures	
Introduction.....	14
State Resource Code 6500	14
State Resource Codes 6501 through 6535	17
Federal Resource Codes 3xxx's and 5640	20
Nonpublic School and Nonpublic Agency	
Background Information.....	24
Nonpublic School (NPS).....	25
Nonpublic Agency (NPA).....	26
Legal Expenses	27
Special Education Maintenance of Effort	
Background Information.....	28
Special Education Maintenance of Effort Reports.....	30
Phase One: Findings	34
Phase One: Recommendations.....	35

PHASE TWO: Comparative Data and Analysis

Preface.....	36
Background Information.....	36
Federal and State Statute.....	37
Comparison of Special Education Pupil Count to Total Enrollment	
Introduction.....	38

Differences in Pupil Count Information by District of Residence and District of Service.....	39
Impact on Funding and Accountability by District of Residence Versus District of Service ..	41
Comparison of Special Education Pupil Count to Total Enrollment	44
Number/Percent of Pupils Identified by Disability Category	45
Comparison of District Special Education Pupil Count to Statewide Averages	48
Number of Pupils Served by Grade Level and Disability.....	50
Percent of Time Inside of Regular Class by Disability.....	53
Type and Frequency of Services Provided	58
Phase Two: Findings.....	65
Phase Two: Recommendations	66

PHASE THREE: Program Delivery Analysis

Preface.....	67
Staffing Levels and Patterns	
Introduction.....	68
Special Education Personnel Data Information	68
Special Education Teachers	70
Instructional Assistants	70
Psychologists	71
Adapted Physical Education Teachers.....	72
Speech and Language Pathologists and Assistants	72
Occupational Therapists.....	73
Itinerant Teachers for Visually Impairment Program	74
Nurses	74
Program Specialists.....	75
Special Education Program Delivery Systems	
Preface.....	78
Evidence-Based Curriculum	78
Special Education Programs	79
Service Delivery.....	80
Least Restrictive Environment.....	81
Psychological Services.....	82
Local Control and Accountability that Support Psychological Services	82
Adapted Physical Education Services.....	83
Occupational and Physical Therapy.....	84
Language and Speech Services	86

Preschool Program	88
Transition Services.....	89
Response to Intervention and Multi-Tiered System of Supports	
Preface.....	90
Multi-Tiered System of Supports.....	91
Student Success Team.....	92
Stakeholder Input	
Preface.....	93
Interview Process with District Personnel	93
District Personnel Input	95
Strengths and Strong Areas of Special Education Programs and Services.....	95
Response to Intervention (RtI) or Multi-Tiered System of Supports	95
Changes or Additions to Improve Special Education Programs and Services	95
Flow of Information or Communication.....	96
Wish List (If we can do one thing for you – what would you want us to do?).....	96
Communication Across District Office and School Sites.....	97
Parent Input	
Preface.....	97
Parent Input Session.....	97
Parent Survey	98
Informal Dispute Resolution.....	103
Other Components	
Personnel Development	105
Inclusion of Students with Disabilities in the LCAP	106
Special Education Handbook.....	107
Organizational Chart.....	107
Phase Three: Findings.....	108
Phase Three: Recommendations	111
Acronym List	117
Attachment One, ‘Friendly’ Title for Standardized Account Structure (SACS)	120

PREFACE

Total School Solutions (TSS) conducted a comprehensive special education financial and program review for the Riverside Unified School District (RUSD). Three phases of this study completed to date include: (1) Financial Audit; (2) Comparative Data and Analysis; and, (3) Program Delivery Analysis. Phase 4, Development and Implementation of a Special Education Strategic Action Plan, will be conducted beginning January 2017.

The RUSD is to be commended for its commitment to study and analyze its special education financial data, programs, and operations. Throughout this study process, District personnel were extremely helpful in providing pertinent information and/or compiling critical data needed to complete this analysis. In particular, a thank you is due to the District Departments of Special Education and Business Services, who responded immediately to every request, shared pertinent data, and were always available to assist in any way possible. Commendation goes also to the Board Members, Superintendent, Chief Business Officer and Governmental Relations, and Assistant Superintendent of Pupil Services and Special Education who are committed to a systemic change process to afford children with disabilities quality programs and services provided in the least restrictive settings.

STUDY ACTIVITIES

Study activities utilized during the course of this review are outlined below.

- Work closely with District fiscal and program personnel to collect and compile financial reports, enrollment data, and program information.
- Analyze financial, program, and pupil count data and prepare pertinent reports.
- Present a draft report of Phase One (*Financial Audit*) and Phase Two (*Comparative Data and Analysis*) to key business and program personnel for review and revisions as needed prior to finalizing these sections.
- Submit a draft report of Phase Three (*Program Delivery and Analysis*) to key program personnel for review and revisions as needed, prior to finalizing this section.
- Submit a final integrated report (Phases One, Two, and Three) to the District.
- Present the report(s), findings, and recommendations as requested by the Superintendent.
- Two TSS Consultants to conduct three days of interviews and/or meetings with stakeholders (e.g., board members, parents, district and site-level administrators and support staff, special and general education teachers, related service providers, pupil personnel, health service providers, and classified staff). Hold interviews and meetings at the District Special Education Office.
- Provide an opportunity to individual board members and parents to meet or talk with TSS Consultants and share their concerns as well as commendations and/or positive aspects.
- Lead a parent input meeting in the evening to facilitate optimum participation.
- Develop and collate a “Special Education Parent Survey.”
- Assist the District in preparing a Special Education Strategic Action Plan (“Action Plan”) to include (a) District-prioritized focus areas and planning strategies based on the findings and recommendations from the special education study; (b) projected timelines; (c) persons responsible for implementation; and, (d) program and/or fiscal adjustments/implications (to be conducted after study process is completed).
- Conduct two days of visitation to assist in implementing the Action Plan.

EXECUTIVE SUMMARY

PHASE ONE: FINANCIAL AUDIT

A financial audit of state and federal revenue and expenditures for special education programs was conducted for Fiscal Years 2011-12 through 2016-17. State and federal special education program revenue and grants were reviewed, including Out-of-Home Care funding and Mental Health Services apportionment. Expenditures were analyzed by specific object codes (e.g., certificated and classified salaries, employee benefits, book/supplies, and other operating expenses including nonpublic school/agency contracted services).

Notable increases in specific object codes from prior fiscal years were analyzed to determine those expenses that could result in more adverse financial implications. Contributing areas were identified that may have created and/or increased excess costs. Preliminary recommendations were provided in the full report for District's consideration in order to maximize existing revenue and/or reduce the contribution from the general fund to special education, where appropriate.

FINDINGS

- With Local Control Funding Formula (LCFF), transfer of revenue limit dollars for special education students was eliminated, and as such the deficiency of special education revenue to expenditures increased requiring additional contribution from the general fund.
- In reviewing the Local Control and Accountability Plan (LCAP), there is no specific language to address the needs of student with disabilities, as well as help offset the deficit due to the elimination of revenue limit dollars transfers.
- With substantial increases in Mental Health Services funding from one fiscal year to the next, Riverside Unified School District (RUSD) continues to have a large excess of revenue to expenditures in Resource Code 5640.
- There is a significant ending fund balance in the LEA Medi-Cal Billing Option Program.
- Although the number of nonpublic school (NPS) pupils significantly decreased across the fiscal years studied, the NPS costs did not decrease proportionately.
- The nonpublic agency (NPA) costs decreased across the fiscal years studied, which could indicate that District employees are providing these related services as needed. For example, RUSD has built capacity related to Applied Behavior Analysis (ABA) and created a cadre of behavior intervention specialized staff members.
- Combined legal expenses from Special Education and the General Fund increased by approximately \$384,000 or 85 percent from Fiscal Year (FY) 2014-15 to FY 2015-16.
- Contributing areas identified that may have created and/or increased excess costs include:
 - a. Less Assembly Bill 602 state entitlement due to declining average daily attendance;
 - b. Elimination of transfer of revenue limit dollars due to implementation of LCFF;
 - c. Series of negotiated certificated and classified salary agreements, as well as an increase in services to students in the form of increasing daily instructional hours;
 - d. Capping special education class sizes resulting in opening additional classes;
 - e. Higher number of identified pupils with speech and language development needs requiring speech pathology related services; and,
 - f. Providing more services to accommodate pupils enrolled under District of Choice and inter-district permits.

PHASE TWO: COMPARATIVE DATA AND ANALYSIS

In order to determine operational functions and service deliveries that have financial implications, special education pupil count data were analyzed and when appropriate compared to statewide averages and benchmarks. This information included, but was not limited to: number and percent of students identified by disability group, grade level, and age range; type and frequency of services provided to special education students; percentage of time students (by disability) were served in general education classes and other instructional settings; and, special education enrollment trends compared to total enrollment.

FINDINGS

- There are significant differences in the District of Residence (DOR) pupil count reported by RUSD as compared to the District of Service (DOS) pupil count. Although RUSD assumes all financial and educational responsibility, these pupils are reported as DOS only. There are no contracts or inter-SELPA permits that allow RUSD to determine excess costs for IEP-required programs and services rendered to these pupils.
- In comparing the percent of enrollment by disability for December 2012 through 2015, categories showing growth included: Other Health Impairment (OHI); Specific Learning Disability (SLD); and, Autism. On the contrary, Speech or Language Impairment (SLI), Emotional Disturbance (ED), and Orthopedic Impairment (OI) showed a decline.
- Regarding pupils with ED, a decrease was reported from 182 pupils in 2012 to 112 in 2015. It appears that some pupils are receiving limited or no 500 Code services related to counseling, guidance, psychological, social work, and/or behavior intervention.
- Some nonpublic schools (NPS) have bundled their daily rate that might include the basic educational program along with counseling and guidance and other related Mental Health educationally based services. As such, these related services might not appear on the pupils' individualized education program (IEP).
- As of December 2011 through 2015, RUSD reported a lower percentage of disability categories than statewide averages in: Hard of Hearing (HH); Deaf; Visual Impairment (VI); ED; OI; SLD; and, Autism. On the contrary, RUSD had a higher percentage in: Intellectual Disability (ID); SLI; OHI; and, Multiple Disability (MD).
- Although the number of SLI pupils has decreased, the District's percentage is higher than statewide averages. Also, approximately 46-48 percent of the speech therapy was provided as a related service in December 2014 and 2015 to pupils with other disabilities than speech impairment.
- The number of pupils reported as "Other/Ungraded" increased from 52 in 2011 to 130 in 2015.

PHASE THREE: PROGRAM DELIVERY ANALYSIS

A review of special education program operations, including current staffing levels and patterns, was conducted to determine if the District could decrease and/or increase staff, and/or make any staffing changes to include, but not limited to: special education teachers; related service providers (e.g., speech and language pathologists, adapted physical education teachers, occupational therapists; physical therapists, behaviorists, nurses); pupil personnel (e.g., psychologists); other contracts service providers; and, paraprofessionals.

An analysis of the District's current special education program delivery systems was conducted to determine if they are appropriate as structured or if opportunities exist for enhancing program delivery in the least restrictive environment (LRE), in which to the maximum extent possible, students with disabilities are educated with other students in the regular educational environment. The review addressed the percentage of students receiving services in regular classes, separate special education programs, and separate schools or facilities.

This evaluation included a comprehensive review of District-operated special education programs and services. In looking at a system of operations and instructional settings, special education as a service under a Multi-Tiered System of Supports (MTSS) and Response to Intervention (RtI), was addressed.

Two TSS Consultants conducted three days of on-site meetings and interviews with key groups of stakeholders. A parent forum was held in the evening to facilitate optimum participation. Follow-up emails for continued information gathering as well as and phone conferences were held with stakeholders who were not available during the site interviews. Furthermore, a *Special Education Parent Survey* (in English and Spanish) was mailed to the home address of every special education student enrolled in the RUSD, with a stamped return envelope to the address of Total School Solutions Office in Fairfield, California.

FINDINGS

Staffing Levels And Patterns

- There have been notable increases in special education teachers; mostly a result of adding classes pursuant to the special education class size language in the Agreement for Certificated Bargaining Unit ("Agreement"). Also, one new Transitional Kindergarten (TK) class and two new preschool classes were opened.
- There have been notable increases in instructional assistants; mostly a result of adding classes pursuant to the special education class size language in the Agreement. Also, Intensive Behavior Interventions Assistants were added and a number of assistants may have been increased due to students entering the District with aides included on their IEPs.
- Although the Special Education Department has an allocation formula to assign instructional assistants to each school site based on the number of special education classes and adherence to the special education class size language in the Agreement, it appears that a system is not in place to monitor on a regular basis, the actual number of aide hours at each school site in order to determine if a current employee is available to fill immediate vacancies and/or assist with assigning specific special circumstances for individual students.
- The Special Education Department recently adopted a formal process and protocol when determining the need for special circumstance instructional assistants for individual students. Training has been provided to principals and other school site administrators.
- The District is cognizant of mandated state staffing caseloads (e.g., Resource Specialists and Speech and Language Pathologists) and actively recruits to adhere to these statutes and/or contracts with nonpublic agencies to fill the vacancies.

- The Special Education Department and Human Resources has actively recruited for positions to build capacity within its own programs (e.g., Occupational Therapists, Intervention Specialists).
- The Early Childhood Assessment Team (ECAT), comprised of psychologists, speech pathologists, as well as a nurse, occupational therapist, or other related service provider(s) as needed, is a time-consuming process and involved approximately 200 assessments last year for determination of eligibility for special education services at the preschool level. It appears that there is adequate staffing to complete these assessments. However, the nursing staff indicated a need for additional time to participate fully in the ECAT process.
- There appears to be inadequate support to school sites with only six full-time Program Specialists. Their assignments were restructured this school year so that each Program Specialist serves specific number of schools along with having other specialty responsibilities based on their expertise.

Special Education Program Delivery Systems

- Adoption of evidence-based curriculum and expansion of course offerings have provided special education students more access to the core curriculum.
- The District provides a comprehensive continuum of programs for special education students across the school sites, including an alternative campus.
- It appears that there are limited “push-in” or integration models at the secondary level. Integration models would include having the majority of services provided in general education classes with the support from special education teachers and other related service providers.
- The District did not meet its state-imposed targets for Indicator 5A and 5B–Least Restrictive Environment. The 5C target was met in 2013-14, but not 2014-15. Indicator 5 measures the average amount of time special education pupils, between the ages of 6 through 21, receive their services in settings apart from peers without disabilities.
- The District did not meet its Indicator 6–Preschool Least Restrictive Environment for 2013-14 and 2014-15. Indicator 6 measures the percent of children ages 3 through 5 with IEPs attending regular early childhood program and receiving a majority of special education and related services in the regular program or, in a separate special education class, separate school or residential facility.
- Intensive behavioral intervention supports and psychological services are provided for students with social-emotional needs, including global implementation of Boys Town curriculum and interventions across all classes designed for students with emotional and behavioral disorders.
- The Student Assistance Program (SAP) was repeatedly cited during the stakeholder meetings as a critical resource for special education students, especially in the area of social and emotional support personnel to provide Positive Behavioral Interventions and Supports (PBIS).
- District personnel, who provide related services in the areas of adapted physical education, speech therapy, and occupational therapy, work collaboratively within each of their special areas. There specific challenges that face each of these areas, which are addressed separately in the full report.

Multi-Tiered System of Supports

- Some of the teaching staff did not know the distinction between RtI and MTSS; however, it appears that numerous educators were providing levels of support within the context of RtI and/or MTSS.
- The District has a clear understanding of a MTSS framework and has implemented elements of MTSS initiated this school year. Considerable district-wide planning has occurred through the Curriculum and Instruction Department, and a MTSS Specialist has been employed. Special Education Department representatives have been included in this process and attend monthly focus meetings.
- All components of the Student Success Team (SST) intervention process have been integrated within a MTSS and RtI structure to include detailed procedures, forms, and professional development. However, the SST process is not being implemented consistently across all school sites.

Stakeholder Input

- District personnel who participated in the three-day stakeholder meetings were professional and open in sharing their concerns as well as providing constructive ideas for improvement. There were many positive comments shared during the discussions and it was evident that the members of each job-alike group respect one another and collaborate to do what's best for their students.
- It was clear during the personal discussions with the special education teachers and related service providers that they are dedicated, hardworking, and are interested in looking at different service delivery models to promote maximum student learning as well as more inclusion into general education settings.
- All staff members interviewed believed that there is good communication from the District Office to the school sites and educators are afforded many opportunities for professional development.

Parent Input

- Based on the results of a *Special Education Parent Survey*, the majority of the responses (from 84 to 97 percent) were in the categories of “strongly agree” and “agree.” A few parents noted individual concerns on their surveys.
- During a parent input session, with approximately twelve participants and several follow-up phone calls made by the TSS Consultant, individual parent and student challenges were raised. The concerns and challenges will be provided confidentially to Special Education District administrators for follow-up.

PHASE FOUR: SPECIAL EDUCATION STRATEGIC ACTION PLAN

A TSS Consultant will assist the District in preparing a Special Education Strategic Action Plan to include (a) District-prioritized focus areas and planning strategies based on the findings and recommendations from this study; (b) projected timelines; (c) persons responsible for implementation; and, (d) program and/or fiscal adjustments/implications. Two days of consultation will be provided to assist in implementing the Strategic Action Plan.

PHASE ONE: FINANCIAL AUDIT

PREFACE

Study components addressed during PHASE ONE are listed below.

- Financial audit of state and federal revenue and expenditures for special education programs for Fiscal Years (FY) 2011-12 through 2016-17.
- Review of state and federal special education program revenue for Resource Code 6500 for state apportionment and Resource Code 3xxx's for Federal grants funded with Individuals with Disabilities Education Act (IDEA) dollars and Resource Code 5640 for Other Federal Revenue. This review included Out of Home Care funding and Mental Health Services apportionment.
- Analysis of expenditures by Object Codes: Certificated Personnel Salaries 1000's; Classified Personnel Salaries 2000's; Employee Benefits 3000's; Books and Supplies 4000's; and, Other Operating Expenses 5000's).
- Review of contract service agreements (as operating expenses under Object Code 5000's specifically related to nonpublic schools/agencies, and/or other contracted services.
- Analysis of identified notable percentage increases in specific object codes from one year to the next to determine those expenses that could result in more adverse financial implications.
- Identification of contributing factors that may have created and/or increased excess costs.
- Examination of the Special Education Maintenance of Effort (SEMOE) reports across the same six-year reporting period. The District's local percentage of total expenditures (contribution from unrestricted revenue) was compared to statewide averages.

This review of the **Financial Audit** will be presented into three parts as listed below.

- Program Revenue
- Program Expenditures
- Maintenance of Effort

PROGRAM REVENUE

Introduction

A series of tables for program revenue is presented as reported in the Standardized Accounting Code Structure (SACS) Resource Code 65xx's for state revenues, the SACS Resource Code 3xxx's for Federal grants funded with Individuals with Disabilities Education Act (IDEA) dollars, and the SACS Resource Code 5640 for Other Federal Revenue. The source of these "Financial Summaries by Fund and Resource" was provided by the RUSD Business Services Department for FY 2011-12 through 2016-17.

For reference purposes, **Attachment One** includes a list of SACS Resource and Object Codes, along with a description and links to specific details regarding each of the Resource Codes.

State Resource Code 6500

“Special Education Program State Apportionment” for SACS State Resource Code 6500 as outlined in **Figure 1** is comprised of state apportionment, revenue limit dollars, and a small amount of local special education revenue. The Local Control Funding Formula (LCFF) was implemented in 2013-14 and the transfer of revenue limit dollars for special education students was eliminated. Revenue limit transfer was reported in Object Code 8091 and any transfer of unrestricted LCFF funding to Resource 6500 is currently reported as a contribution using Object Code 8980.

The special education state apportionment is certified during the current year at P-1 (first principal apportionment) and at P-2 (second principal apportionment). The annual apportionment is certified the following year; recertified three times; and, all data corrections are reflected with subsequent year certifications.

Beginning in Fiscal Year (FY) 2012-13, the current year apportionment has been deficit-funded, with the proration factor eliminated in subsequent year certifications. The apportionment is funded based on school district total average daily attendance (ADA). Since RUSD’s ADA has been in decline since FY 2014-15, the current year apportionment has been steadily decreasing. See **Figure 20** (Column C) for P-2 ADA information from FY 2011-12 through 2015-16. A declining ADA Adjustment of (\$145,038.09) was applied to RUSD’s “SELPA Special Education Funding Exhibit” for 2015-16 P-2.

In FY 2015-16, the FY 2014-15 annual apportionment did not eliminate the proration factor, so we can anticipate increased funding in FY 2016-17 from adjustments to prior year corrections.

Figure 1 – Special Education Program State Apportionment by Resource Code 6500

A	B	C	D	E	F	G
Description Resource Code 6500 (Object Code)	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16	Budgeted FY 2016-17
Revenue Limit Transfers (Object Code 8091)	8,886,130.00	9,773,563.00				
State Apportionment/ Revenue (Object Code 8311)	20,873,960.00	20,428,373.00	21,009,666.00	21,796,713.01	21,263,376.00	21,415,934.00
All Other Local Revenue (Object Code 8699)	304.65	47,916.95	27,357.34	2,901.00	339,731.62	0.00
Total State Revenue (Resource 6500)	29,760,394.65	30,249,852.95	21,037,023.34	21,799,614.01	21,603,107.62	21,415,934.00
Difference in Revenue from Prior Fiscal Year		489,458.30	(9,212,829.61)	762,590.67	(196,506.39)	(187,173.62)
Percentage Change from Prior Fiscal Year		1.64%	(30.46%)	3.62%	(0.90%)	(0.87%)

The “Deficiency of Special Education Program Revenue to Expenditures” by SACS Resource Code 6500 (state apportionment) and General Fund Contribution is presented in **Figure 2**. A general fund contribution is made to offset the excess costs. That contribution and its percent of total revenue in Resource Code 6500 are also shown in this table.

- The General Fund Contribution to Resource Code 6500 has steadily increased from \$12,670,207.95 (Column B) in FY 2011-12 to \$46,820,556.00 (Column G) budgeted in FY 2016-17.
- The General Fund Contribution of \$15,313,094.92 in FY 2012-13 increased substantially to \$25,296,731.23 in FY 2013-14 as a result of the onset of LCFF funding and the elimination of the revenue limit transfer in Resource Code 6500.

Figure 2 – Deficiency of Special Education Program Revenue to Expenditures by Resource Code 6500 (State Apportionment) and General Fund Contribution

A	B	C	D	E	F	G
Description Resource Code 6500 (Object Code)	Actuals FY 2011-12*	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16	Budgeted FY 2016-17
Deficiency of Revenue to Expenditures (Object Code 8980)	12,820,695.95	15,313,094.92	25,296,731.23	30,161,986.28	36,742,891.23	46,820,556.00
General Fund Contribution (Object Code 8980)	12,670,207.95	15,313,094.92	25,296,731.23	30,161,986.28	36,742,891.23	46,820,556.00
Total Revenue (Includes Contribution)	42,430,602.60	45,562,947.87	46,333,754.57	51,961,600.29	58,345,998.85	68,236,490.00
Percent of General Fund Contribution to Total Revenue	29.86%	33.61%	54.60%	58.05%	62.97%	68.62%

* In FY 2011-12, Resource Code 6500 had a beginning fund balance of \$150,488.00.

State Resource Codes 6501 through 6535

“Special Education Program State Revenue” for SACS Resource Codes 6501 through 6535 is shown in **Figure 3**.

- The lowest State Revenue was reported at \$2,168,596.00 in FY 2011-12, with the highest reported in FY 2014-15 at \$2,921,156.00.
- There was a significant increase of 40.61 percent in Mental Health Services funding from \$1,690,208.00 in FY 2011-12 to \$2,376,579.00 in FY 2012-13.
- Otherwise, State Revenue has remained consistent.

Figure 3 – Special Education Program State Revenue by Resource Codes 6501 through 6535

A	B	C	D	E	F	G
Description (Object Code) Resource Code	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16	Budgeted FY 2016-17
Low Incidence Funding (8311) Resource Code 6501/6531*	110,559.00	120,697.00	161,221.99	149,079.00	163,599.00	124,270.00
Mental Health Services (8590) Resource Code 6512	1,690,208.00	2,376,579.00	2,396,174.00	2,413,840.00	2,394,131.00	2,458,725.00
Infant Discretionary Funds (8590) Resource Code 6515	1,365.00	2,148.00	3,689.00	6,591.00	4,159.00	0.00
Workability I LEA (8590) Resource Code 6520	335,976.00	335,976.00	349,664.00	351,646.00	345,146.00	327,889.00
Low Incidence Entitlement** (8590) Resource Code 6530	12,834.00	13,508.00				
Personnel Staff Development** (8590) Resource Code 6535	17,654.00	17,564.00				
Total State Revenue	2,168,596.00	2,866,472.00	2,910,748.99	2,921,156.00	2,907,035.00	2,910,884.00
Difference in Revenue from Prior Fiscal Year		697,876.00	44,276.99	10,407.01	(14,121.00)	3,849.00
Percentage Change from Prior Fiscal Year		32.18%	1.54%	0.36%	(0.49%)	0.13%

* Resource Code 6501 was a local resource established for Low Incidence funding through 2014-15. In 2015-16, CDE created a State Local Assistance Grant and used Resource Code 6501. Resource Code 6531 was then established for Low Incidence funding.

** Resource Code 6530 and Resource Code 6535 were eliminated in 2013-14.

The “Excess of Special Education Program Revenue to Expenditures” for SACS Resource Codes 6501/6531 (Low Incidence Funding) and 6512 (Mental Health Services) is presented in **Figure 4** as an excess of revenue as compared to expenditures.

The current budget shows that RUSD will spend the majority of its “Total Ending Fund Balance” in Resource Code 6501/6531 (Low Incidence Funding). There was an ending balance of \$291,924.69 reported in FY 2015-16, with only \$9,083.69 budgeted in FY 2016-17. This funding supports the purchase of specialized books, materials, and equipment as required under the individualized education program (IEP) for each pupil with LI disabilities as defined in the California (CA) Education Code (EC) Section (§) 56026.5: “hearing impairments, vision impairments, severe orthopedic impairments, or any combination thereof.”

On June 30, 2011, Assembly Bill (AB) 114 “was signed into law. Under AB 114, several sections of Chapter 26.5 of the California *Government Code (GC)* were amended or rendered inoperative, thereby ending the state mandate on county mental health agencies to provide mental health services to students with disabilities. With the passage of AB 114, it is clear that school districts are now solely responsible for ensuring that students with disabilities receive special education and related services, including some services previously arranged for or provided by county mental health agencies.”

Reference: California Department of Education website, *AB 114 Special Education Transition* <http://www.cde.ca.gov/sp/se/ac/ab114twg.asp>

There is a significant “Total Ending Fund Balance” of \$10,327,462.12 in FY 2015-16 in Resource Code 6512 – Special Education Mental Health Services. Since the “Total Ending Fund Balance” is budgeted at \$10,327,462.12 again in FY 2016-17, it appears that RUSD is anticipating to spend the full amount of mental health revenue allocated in FY 2016-17. This funding must exclusively be used to support mental health services that are included within an IEP. It is the understanding of the TSS Consultants that RUSD is in the process of developing a comprehensive Mental Health plan. This will be studied further in Phase Three, “Program Delivery Analysis,” during the Special Education Program Review to be conducted during September through November 2016 by TSS.

Figure 4 – Excess of Special Education Program Revenue to Expenditures by Resource Codes 6501/6531 (Low Incidence Funding) and 6512 (Mental Health Services)

A	B	C	D	E	F	G
Description Resource Code	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16	Budgeted FY 2016-17
Low Incidence Funding Resource Code 6501/6531*	61,268.83	35,485.95	104,549.26	51,957.41	38,663.24	(282,841.00)
Total Ending Fund Balance	61,268.83	96,754.78	201,304.04	253,261.45	291,924.69	9,083.69
Mental Health Services Resource Code 6512	1,690,208.00	2,307,148.76	2,369,277.17	2,254,937.93	1,705,890.26	0.00
Total Ending Fund Balance	1,690,208.00	3,997,356.76	6,366,633.93	8,621,571.86	10,327,462.12	10,327,462.12

* Resource Code 6501 was a local resource established for Low Incidence funding through 2014-15. In 2015-16, CDE created a State Local Assistance Grant and used Resource Code 6501. Resource Code 6531 was then established for Low Incidence funding.

Federal Resource Codes 3xxx's and 5640

Included in **Figure 5** are the following components: “Special Education Program Federal Revenue” for SACS Federal Resource Codes 3xxx's (federal grants funded with IDEA dollars); and, SACS Resource Code 5640 (Other Federal Revenue).

- Total Federal Revenue, as reported in the actuals, fluctuated from a low of \$8,725,159.79 in FY 2011-12 to a high of \$9,725,340.73 in FY 2015-16.
- There was an increase in Mental Health Services funding from \$573,703.35 in FY 2014-15 to 919,971.26 in FY 2015-16.

Figure 5 – Special Education Program Federal Revenue by Resource Codes 3xxx's and Resource Code 5640

A	B	C	D	E	F	G
Description (Object Code) Resource Code	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14*	Actuals FY 2014-15	Actuals FY 2015-16*	Budgeted FY 2016-17*
Local Assistance Entitlement (8181) Resource Code 3310	7,115,590.32	7,438,987.42	7,012,394.52	6,245,577.80	6,829,014.38	6,721,447.00
Local Assistance Private School Proportionate Share (8181) Resource Code 3311	5,888.80	17,340.22	11,041.53		19,025.00	10,000.00
Local Assistance Early Intervening Services (8990) Resource Code 3312			30,000.00		14,970.01	10,000.00
Preschool Grants (8182) Resource Code 3315	197,508.15	200,107.50	180,563.84	172,069.00	171,928.00	155,293.00
Preschool Local Entitlement (8182) Resource Code 3320	346,233.49	346,675.71	308,678.00	324,534.00	319,735.00	292,892.00
Mental Health Services (8182) Resource Code 3327	59,753.68	49,062.22	112,164.00	573,703.35	919,971.26	441,020.00
Preschool Staff Development (8182) Resource Code 3345	927.81	2,805.56	1,039.63	3,037.00	0.00	0.00

Figure 5, Continued – Special Education Program Federal Revenue by Resource Codes 3xxx’s and Resource Code 5640

A	B	C	D	E	F	G
Description (Object Code) Resource Code	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14*	Actuals FY 2014-15	Actuals FY 2015-16*	Budgeted FY 2016-17*
Early Intervention Grants Part C (8182) Resource Code 3385	134,487.00	134,487.00	134,487.00	137,447.00	134,699.48	129,108.00
LEA Medi-Cal Billing Option Resource Code 5640	864,770.54	1,130,302.36	1,075,171.67	1,492,745.49	1,315,997.60	1,100,000.00
Total Federal Revenue	8,725,159.79	9,319,767.99	8,865,540.19	8,949,113.64	9,725,340.73	8,859,760.00
Difference in Revenue from Prior Fiscal Year		594,608.20	(454,227.80)	83,573.45	776,227.09	(865,580.73)
Percentage Change from Prior Fiscal Year		6.81%	(4.87%)	0.94%	8.67%	(8.90%)

Note: Revenue totals may include local revenue.

*Contribution from Resource Code 3310 to Resource Code 3312.

The “Excess of Special Education Program Revenue to Expenditures” by Resource Code 5640 (LEA Medi-Cal Billing Option) is presented in **Figure 6** as an excess of revenue as compared to expenditures. There is a significant ending balance in Resource Code 5640.

Local Educational Agency (LEA) Medi-Cal Billing Option Program provides the federal share of reimbursement for health assessment and treatment for Medi-Cal eligible children and family members within the school environment. The District’s Medi-Cal Collaborative determines how to spend these funds based on identified priorities that are consistent with California laws and regulations.

The significant “Ending Fund Balance” for Resource Code 5640 warrants further analysis to include developing a plan that facilitates expenditures for identified priorities, while maintaining adequate funds for any discrepancies identified in the audit process.

Figure 6 – Excess of Special Education Program Revenue to Expenditures by Resource Code 5640

A	B	C	D	E	F	G
Resource Code 5640 LEA Medi-Cal Billing Option	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16	Budgeted FY 2016-17
Excess of Revenue to Expenditures	221,601.76	284,338.91	122,567.02	379,222.73	121,045.75	140,000.00
Ending Fund Balance	1,278,340.77	1,562,679.68	1,685,246.70	2,064,469.43	2,185,515.18	2,325,515.18

Note: 2011-12 Beginning Fund Balance was \$1,056,739.01.

PROGRAM EXPENDITURES

Introduction

A series of tables for program expenditures is presented as reported in SACS Resource Code 6500 (state apportionment), SACS Resource Codes 3xxx's (federal grants funded with IDEA dollars), and SACS Resource Code 5640 (Other Federal Revenue). The source of these "Financial Summaries by Fund and Resource" was provided by RUSD Business Services Department for FY 2011-12 through 2016-17.

Again, **Attachment One** includes a list of SACS Resource and Object Codes, along with a description and links to specific details regarding each of the SACS Resource Codes.

State Resource Code 6500

The "Special Education Program Expenditures" are presented in **Figure 7** for SACS Resource Code 6500 (state apportionment). Total expenditures ranged from \$42,581,090.60 in FY 2011-12 to \$68,236,490.00 budgeted in FY 2016-17.

The expenditures significantly increased from \$51,961,600.29 expended in FY 2014-15 to \$68,236,490.00 budgeted in FY 2016-17. This will be discussed further in **Figure 8**.

Figure 7 – Special Education Program Expenditures by Resource Code 6500 (State Apportionment)

A	B	C	D	E	F	G
Description Resource Code 6500	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16	Budgeted FY 2016-17
Certificated Salaries (1000-1999)	22,897,149.86	25,173,432.19	25,776,784.23	28,255,901.84	30,865,143.41	34,654,039.00
Classified Salaries (2000-2999)	3,859,152.28	4,475,539.89	5,032,969.98	6,368,477.65	7,243,353.97	9,185,992.00
Employee Benefits (3000-3999)	7,655,766.55	8,413,881.65	8,287,800.87	9,736,307.05	11,769,352.63	14,779,235.00
Books and Supplies (4000-4999)	260,764.47	281,278.20	326,396.40	321,061.06	447,956.32	346,250.00
Services and Other Operating Expenses (5000-5999)	6,352,972.58	5,490,188.00	5,222,686.67	5,539,427.49	5,634,983.40	6,657,190.00
Capital Outlay (6000-6999)					57,772.63	
Other Outgo/ Indirect Cost (7000-7999)	1,555,284.86	1,728,627.94	1,687,116.42	1,740,425.20	2,327,436.49	2,613,784.00
Total Expenses	42,581,090.60	45,562,947.87	46,333,754.57	51,961,600.29	58,345,998.85	68,236,490.00

Provided in **Figure 8** are the increases and/or decreases in special education program expenditures from **Figure 7** from the prior to the next fiscal year. There were notable increases in “Certificated Salaries,” “Classified Salaries,” and “Employee Benefits.”

There was a decrease of \$603,352.04 in “Certificated Salaries” from FY 2012-2013 to FY 2013-14 (Column C) as highlighted below. As TSS Consultants did not have access to the District’s detailed budget reports, this decrease may have been attributed to the state budget shortfall, which prompted local educational agencies to impose mandatory furlough days and/or shortened work years.

Figure 8 – Increase/Decrease in Special Education Program 6500 (State Apportionment) Expenditures from Prior Fiscal Year

A	B	C	D	E	F
Description RESOURCE 6500	Actuals From FY 11-12 To FY 12-13	Actuals From FY 12-13 To FY 13-14	Actuals From FY 13-14 To FY 14-15	Actuals From FY 14-15 To FY 15-16	Budgeted From FY 15-16 To FY 16-17
Certificated Salaries (1000-1999)	2,276,282.33	603,352.04	2,479,117.61	2,609,241.57	3,788,895.59
Classified Salaries (2000-2999)	616,387.61	557,430.09	1,335,507.67	874,876.32	1,942,638.03
Employee Benefits (3000-3999)	758,115.10	(126,080.78)	1,448,506.18	2,033,045.58	3,009,882.37
Books and Supplies (4000-4999)	20,513.73	45,118.20	(5,335.34)	126,895.26	(101,706.32)
Services and Other Operating Expenses (5000-5999)	(862,784.58)	(267,501.33)	316,740.82	95,555.91	1,022,206.60
Capital Outlay (6000-6999)				57,772.63	(57,772.63)
Other Outgo/ Indirect Cost (7000-7999)	173,343.08	(41,511.52)	53,308.78	587,011.29	286,347.51
Change in Total Expenses	2,981,857.27	770,806.70	5,627,845.72	6,384,398.56	9,890,491.15

The information from **Figure 8** was converted into percentages as shown in **Figure 9**.

Again, notable increases by “Percentage Change” from prior fiscal years were reported in “Certificated Salaries,” “Classified Salaries,” and “Employee Benefits.”

Figure 9 – Percentage Change from Prior Fiscal Years in Special Education Program 6500 (State Apportionment) Expenditures

A	B	C	D	E	F
Description RESOURCE 6500	Actuals From FY 11-12 To FY 12-13	Actuals From FY 12-13 To FY 13-14	Actuals From FY 13-14 To FY 14-15	Actuals From FY 14-15 To FY 15-16	Budgeted From FY 15-16 To FY 16-17
Certificated Salaries (1000-1999)	9.94%	2.40%	9.62%	9.23%	12.28%
Classified Salaries (2000-2999)	15.97%	12.46%	26.54%	13.74%	26.82%
Employee Benefits (3000-3999)	9.90%	(1.50%)	17.48%	20.88%	25.57%
Books and Supplies (4000-4999)	7.87%	16.04%	(1.63%)	39.52%	(22.70%)
Services and Other Operating Expenses (5000-5999)	(13.58%)	(4.87%)	6.06%	1.73%	18.14%
Capital Outlay (6000-6999)					(100.00%)
Other Outgo/ Indirect Cost (7000-7999)	11.15%	(2.40%)	3.16%	33.73%	12.30%
Percentage Change	7.00%	1.69%	12.15%	12.29%	16.95%

It was shared by RUSD that there have been a series of negotiated certificated and classified salary agreements, as well as an increase in services to students in the form of increasing daily instructional hours. Also, a special education maximum caseload of 13 pupils for elementary Special Day Class (SDC) was enacted resulting in the Special Education Department opening ten classes throughout the 2015-16 school year and ongoing as needed in subsequent school years.

Reprinted below is an excerpt from the “2013-2016 Agreement for Certificated Bargaining Unit” between the RUSD and the Riverside City Teachers Association (RCTA) related to class size.

ARTICLE XII – CLASS SIZE

Section 5 - Special Education

- A. The District will examine individual caseloads to determine what additional staff support or other assistance is needed should site averages exceed these maximums:
 1. Elementary Special Day Class: 13
 2. Middle School Special Day Class and High School Severely Handicapped Class: 15
 3. Elementary and Middle School Resource Specialist: 28 (32 with waiver)
 4. High School RSP and Non SH Special Day Classes: 25
 5. Designated Instructional Services: 60

A list of the most recent classified personnel related to special education is listed below as posted from the posted on the District website.

<u>Classification</u>	<u>Salary Range</u>
Certified Sign Language Interpreter	32
Instructional Assistant - Special Education I	9
Instructional Assistant - Special Education II	14
Instructional Assistant - Special Education II – Sign Language	14
Intensive Behavior Interventions Assistant	16
Job Development Specialist	30
Non Public School Agency Technician Assistant	16
Occupational Therapist	48
Occupational Therapy Assistant	30
Occupational Trainer	14
Pupil Services/SELPA Technician	22
Resource Assistant	10
Senior Job Development Specialist	32
Senior Occupational Trainer	16
Sign Language Interpreter	17
Speech Language Pathology Assistant	30
Student Health Care Specialist	30
Transcriber – Visually Impaired	17

The District may want to further analyze if any of the increases and/or fluctuations from one year to the next in “Classified Salaries” could be the result of the number of one-on-one instructional aide time. Increased expenses could be attributed to RUSD providing support and related services based on pupil needs pursuant to IEP in one or more of the following areas: sign language interpretation; health services, intensive behavioral intervention, job development, occupational therapy, sign language interpretation, speech therapy, and/or transcription. It was reported by the District Special Education Department that RUSD has built capacity and provides related services formerly contracted through nonpublic agencies.

State Resource Codes 6501 through 6535

The summary of SACS Resource Codes 6501 through 6535 for “Special Education Program State Expenditures” is summarized in **Figure 10**. Observations are listed below.

- Total State expenditures ranged from a low of \$417,119.17 in FY 2011-12 to a high of \$3,193,725.00 budgeted in FY 2016-17.
- There was a significant increase in expenditures in Resource Code 6512 with:
 - \$158,902.07 expended in FY 2014-15;
 - \$688,240.74 expended in FY 2015-16; and,
 - \$2,458,725.00 budgeted in FY 2016-17.

Figure 10 – Summary of Special Education Program State Expenditures by Resource Codes 6501 through 6535

A	B	C	D	E	F	G
Description Resource Codes 6501 through 6535	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16	Budgeted FY 2016-17
Low Incidence Resource Code 6501/6531	49,290.17	85,211.05	56,672.73	97,121.59	124,935.76	407,111.00
Mental Health Services Resource Code 6512		69,430.24	26,896.83	158,902.07	688,240.74	2,458,725.00
Infant Discretionary Resource Code 6515	1,365.00	2,148.00	3,689.00	6,591.00	4,159.00	
Workability I LEA Resource Code 6520	335,976.00	335,976.00	349,664.00	351,646.00	345,146.00	327,889.00
Low Incidence* Resource Code 6530	12,834.00	13,508.00				
Personnel Staff Development* Resource Code 6535	17,654.00	17,564.00				
Total Expenditures	417,119.17	523,837.29	436,922.56	614,260.66	1,162,481.50	3,193,725.00

* No Longer Funded

The information in **Figure 10** above is disaggregated by SACS Object Codes in **Figure 11**. This table appears on the next two pages.

Again, the purpose of this table is to look at Object Codes within each of the SACS Resource Codes for 6501 through 6535 to determine if there are any notable decreases/increases across fiscal years. Five areas appear to have notable changes that include:

- 1) “Certificated Salaries” in Resource Code 6512 with a low of \$13,869.74 in FY 2012-13, increasing each FY to a high of \$962,967.00 budgeted in FY 2016-17;
- 2) “Certificated Salaries” in Resource Code 6512 with no expenditures until FY 2015-16;
- 3) “Employee Benefits” in Resource Code 6512 with \$2,147.52 in FY 2012-13, increasing substantially each FY to \$277,187.00 budgeted in FY 2016-17; and,
- 4) “Books and Supplies” in Resource Codes 6501/31 with \$41,862.50 in FY 2011-12, increasing to \$114,685.58 in FY 2015-16, and budgeted \$401,792.00 in FY 2016-17.
- 5) “Books and Supplies” in Resource Code 6512 with \$26,873.43 in FY 2015-16, increasing to \$158,835.00 budgeted in FY 2016-17.

Figure 11 – Special Education Program State Expenditures by Resource Codes 6501 through 6535 and by Object Codes

A	B	C	D	E	F	G
Description Resource Codes 6501 through 6535	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16	Budgeted FY 2016-17
Certificated Salaries (1000-1999)						
Resource 6501/6531						
Resource Code 6512		13,869.74	34,718.06	131,811.33	339,957.83	962,967.00
Resource Code 6515	1,158.31	1,253.81	301.17	5,643.00	1,815.06	
Resource Code 6520	92,649.90	94,259.40	90,358.76	106,809.49	94,645.49	107,490.00
Resource Code 6530		2,713.78				
Resource Code 6535	11,483.63	7,905.41				
Classified Salaries (2000-2999)						
Resource 6501/6531						
Resource Code 6512					11,525.28	50,159.00
Resource Code 6515		477.60				
Resource Code 6520	144,530.94	141,837.22	161,818.45	154,155.59	151,873.40	128,797.00
Resource Code 6530	2,900.00	2,327.76				
Resource Code 6535	3,487.55	6,210.95				
Employee Benefits (3000-3999)						
Resource 6501/6531						
Resource Code 6512		2,147.52	6,360.48	20,833.23	70,999.70	277,187.00
Resource Code 6515	150.54	326.06	34.45	701.07	257.75	
Resource Code 6520	53,627.67	56,191.87	59,105.78	50,656.23	59,162.00	67,732.00
Resource Code 6530	1,642.02	1,090.73				
Resource Code 6535	1,956.82	2,707.39				
Books and Supplies (4000-4999)						
Resource 6501/6531	41,862.50	68,050.20	46,312.28	81,903.89	114,685.58	401,792.00
Resource Code 6512		246.80			26,873.43	158,835.00
Resource Code 6515			3,198.08		1,900.27	
Resource Code 6520	20,197.37	17,626.59	10,695.71	8,329.05	9,274.47	8,121.00
Resource Code 6530	2,750.60	1,936.14				
Resource Code 6535						

Legend for Resource Codes

6501/6531 Special Education Low Incidence
6512 Special Education: Mental Health Service
6515 Special Education: Infant Discretionary. Early Ed Individuals with Exceptional Needs
(Infant Program)
6520 Special Education: Project Workability I LEA
6530 Special Education: Low Incidence (No Longer Funded)
6535 Special Education: Personnel Staff Development (No Longer Funded)

Figure 11 (continued) – Special Education Program State Expenditures by Resource Codes 6501 through 6535 and by Object Codes

A	B	C	D	E	F	G
Description Resource Codes 6501 through 6535	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16	Budgeted FY 2016-17
Services/Operating Expenses (5000-5999)						
Resource 6501/6531	5,400.10	13,569.58	8,097.02	1,993.57	4,927.40	
Resource Code 6512		50,240.00	(14,181.71)	484.54	214,116.66	899,406.00
Resource Code 6515			7.97	7.48	8.73	
Resource Code 6520	11,149.65	11,901.01	13,720.22	18,920.22	15,486.00	1,000.00
Resource Code 6530	5,013.45	4,870.59				
Resource Code 6535						
Capital Outlay (6000-6999)						
Resource 6501/6531				10,061.20		
Resource Code 6512						
Resource Code 6515						
Resource Code 6520						
Resource Code 6530						
Resource Code 6535						
Other Outgo/Indirect (7000-7999)						
Resource 6501/6531	2,027.57	3,591.27	2,263.43	3,162.93	5,322.78	5,319.00
Resource Code 6512		2,926.18		5,772.97	24,767.84	110,171.00
Resource Code 6515	56.15	90.53	147.33	239.45	177.19	
Resource Code 6520	13,820.47	14,159.91	13,965.08	12,775.42	14,704.64	14,749.00
Resource Code 6530	527.93	569.00				
Resource Code 6535	726.00	740.25				
Total Expenditures	417,119.17	523,837.29	436,922.56	614,260.66	1,162,481.50	3,193,725.00

Federal Resource Codes 3xxx's and 5640

The summary of SACS Resource Codes 3xxx's and 5640 for "Special Education Program Federal Expenditures" is provided in **Figure 12**.

Total Federal expenditures ranged from a low of \$8,503,558.12 in FY 2011-12 to a high of \$9,604,294.98 in FY 2015-16.

Figure 12 – Summary of Special Education Program Federal Expenditures by Resource Codes 3xxx's and 5640

A	B	C	D	E	F	G
Description Resource Codes 3xxx's and 5640	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16	Budgeted FY 2016-17
Resource Code 3310	7,115,590.32	7,438,987.42	7,012,394.52	6,245,577.80	6,829,014.38	6,721,447.00
Resource Code 3311	5,888.89	17,340.22	11,041.53		19,025.00	10,000.00
Resource Code 3312			30,000.00		14,970.01	10,000.00
Resource Code 3315	197,508.15	200,107.50	180,653.84	172,069.00	171,928.00	155,293.00
Resource Code 3320	346,233.49	346,675.71	308,678.00	324,534.00	319,735.00	292,892.00
Resource Code 3327	59,753.68	49,062.22	112,164.00	573,703.35	919,971.26	441,020.00
Resource Code 3345	927.81	2,805.56	1,039.63	3,037.00		
Resource Code 3385	134,487.00	134,587.00	134,487.00	137,447.00	134,699.48	129,108.00
Resource Code 5640	643,168.78	845,963.45	952,604.65	1,113,522.76	1,194,951.85	960,000.00
Total Expenditures	8,503,558.12	9,035,529.08	8,743,063.17	8,569,890.91	9,604,294.98	8,719,760.00

The information in **Figure 12** above is disaggregated by SACS Object Codes in **Figure 13**. The purpose of this table is to look at specific Object Codes within each of the SACS Resource Codes for 3xxx's and 5640 to determine if there are any notable decreases/increases across fiscal years. This table appears on the next two pages.

Three areas appear to have notable changes that include:

- “Certificated Salaries” in Resource Code 3310 with a large increase in FY 2015-16 and no amount budgeted in FY 2016-17;
- “Books and Supplies” in Resource 3327 with a large increase FY 2014-15 and in Resource Code 5640 with a substantial decrease in FY 2015-16 and no amount budgeted in FY 2016-17; and,
- “Services/Operating Expenses” in Resource Codes 3327 and 5640 with fluctuations of higher to lower expenditures across all FYs.

Again for reference purposes, **Attachment One** includes a list of the SACS Resource and Object Codes, along with a description and links to specific details regarding each of the Resource Codes. Also a legend for Resource Codes 3xxx's and 5640 is outlined on the following page.

Figure 13 – Special Education Program Federal Expenditures by Resource Codes 3xxx's and 5640 and by Object Codes

A	B	C	D	E	F	G
Description RESOURCES 3xxx's and 5640	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16	Budgeted FY 2016-17
Certificated Salaries (1000-1999)						
Resource Code 3310	171,765.62	173,360.70	22,423.87	21,333.06	319,706.52	
Resource Code 3311	4,190.00					
Resource Code 3312						
Resource Code 3315	61,148.21	60,026.66	47,399.90	47,992.50	51,563.00	54,735.00
Resource Code 3320	268,333.98	265,256.21	239,112.22	251,134.18	211,776.34	216,455.00
Resource Code 3327		37,558.00		79,262.08	229,543.30	193,035.00
Resource Code 3345		328.50	895.68	1,314.00		
Resource Code 3385	72,999.14	95,757.80	82,571.76	94,171.04	87,504.52	89,575.00
Resource Code 5640	128,989.68	110,354.71	114,960.04	189,518.72	274,708.35	322,221.00
Classified Salaries (2000-2999)						
Resource Code 3310	4,398,423.46	4,622,273.93	4,609,256.35	4,135,283.77	4,289,373.02	4,327,357.00
Resource Code 3311						
Resource Code 3312						
Resource Code 3315	69,789.81	70,600.71	74,016.98	73,336.90	66,852.85	49,733.00
Resource Code 3320		1,354.34			6,475.72	
Resource Code 3327				21,686.55	93,271.73	71,959.00
Resource Code 3345		1,830.11				
Resource Code 3385	23,427.99	7,792.85	19,103.71	9,557.85	13,313.39	7,621.00
Resource Code 5640	71,612.03	111,108.11	106,686.03	191,276.76	214,684.85	285,439.00
Employee Benefits (3000-3999)						
Resource Code 3310	2,252,126.08	2,328,658.26	2,079,100.43	1,862,026.33	1,890,365.63	2,054,556.00
Resource Code 3311	1,456.64					
Resource Code 3312						
Resource Code 3315	53,988.75	56,514.48	47,489.10	39,197.07	42,784.21	39,232.00
Resource Code 3320	63,342.68	63,177.80	56,988.74	60,383.84	59,612.25	61,790.00
Resource Code 3327		9,436.46		22,614.17	128,286.25	98,858.00
Resource Code 3345		508.71	98.44	163.17		
Resource Code 3385	27,677.55	23,173.97	24,599.60	23,901.10	23,992.06	25,237.00
Resource Code 5640	52,945.44	66,077.90	61,159.96	118,631.66	172,061.60	229,158.00

Legend for Resource Codes

- 3310 IDEA Local Assistance Entitlement (formerly PL 94-142)
- 3311 IDEA Local Assistance Entitlement – Private School Identified Student Percentages (ISPs)
- 3312 IDEA Local Assistance Entitlement – Early Intervening Services
- 3315 IDEA Preschool Grants (Ages 3-4-5)
- 3320 IDEA Preschool Local Entitlement (Ages 3-4-5)
- 3327 IDEA Mental Health Services
- 3345 IDEA Preschool Staff Development
- 3385 Special Education: Early Intervention Grants, Part C (Infants)
- 5640 LEA Medi-Cal Billing Option Program

Figure 13 (continued) – Special Education Program Federal Expenditures by Resource Codes 3xxx's and 5640 and by Object Codes

A	B	C	D	E	F	G
Description RESOURCES 3xxx's and 5640	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16	Budgeted FY 2016-17
Books and Supplies (4000-4999)						
Resource Code 3310	573.25	1,173.99			33,841.50	37,194.00
Resource Code 3311		16,609.40	10,600.55		9,874.77	9,550.00
Resource Code 3312			28,801.83		11,051.43	9,550.00
Resource Code 3315	4,077.82	4,532.00	1,532.67	5,282.10	3,395.40	4,608.00
Resource Code 3320	314.42			1,221.13	28,240.95	1,472.00
Resource Code 3327			16,194.65	217,051.95	10,406.37	
Resource Code 3345	789.64			1,445.50		
Resource Code 3385	3,648.86	578.07		4,179.04	2,785.27	868.00
Resource Code 5640	209,204.86	323,225.85	313,677.63	352,483.05	221,275.28	
Services/Operating Expenses (5000-5999)						
Resource Code 3310			21,548.96	30.64	4,783.58	
Resource Code 3311					8,339.69	
Resource Code 3312					3,280.80	
Resource Code 3315	379.00		3,000.13	9.10	7.70	
Resource Code 3320		2,276.50	249.89	4.42	7.71	
Resource Code 3327	58,663.01		91,489.68	212,245.75	431,775.99	57,330.00
Resource Code 3345	100.00	20.00	3.99	3.99		
Resource Code 3385	1,201.30	1,616.28	2,840.71	752.01	1,365.48	
Resource Code 5640	153,959.83	199,543.25	318,075.34	221,157.90	261,311.90	80,000.00
Other Outgo/Indirect (7000-7999)						
Resource Code 3310	292,701.91	313,520.54	280,064.91	226,904.00	290,944.13	302,340.00
Resource Code 3311	242.25	730.82	440.98		810.54	450.00
Resource Code 3312			1,198.17		637.78	450.00
Resource Code 3315	8,124.56	8,433.65	7,215.06	6,251.33	7,324.84	6,985.00
Resource Code 3320	14,242.41	14,610.86	12,328.15	11,790.43	13,622.03	13,175.00
Resource Code 3327	1,090.67	2,067.76	4,479.67	20,842.85	26,687.62	19,838.00
Resource Code 3345	38.17	118.24	41.52	110.34		
Resource Code 3385	5,532.16	5,668.03	5,371.22	4,885.96	5,738.76	5,807.00
Resource Code 5640	26,456.94	35,653.63	38,045.65	40,454.67	50,909.87	43,182.00
Total Expenditures	8,503,558.12	9,035,529.08	8,743,063.17	8,569,890.91	9,604,294.98	8,719,760.00

NONPUBLIC SCHOOL AND NONPUBLIC AGENCY

Background Information

The RUSD provided Nonpublic School (NPS) and Nonpublic Agency (NPA) financial worksheets for the purposes of this Special Education Review. Also, RUSD provided a December pupil enrollment report of NPS pupils as of December 1st from its California Special Education Management Information System (CASEMIS) for each fiscal year.

Pursuant to CA EC § 56034, a **NPS** is defined below.

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

Note: NPSs need to meet the basic educational needs of individual special education student. The program could range from academic subjects to life skills classes that meet graduation requirements.

Pursuant to CA EC § 56035, a **NPA** is defined below.

“Nonpublic, nonsectarian agency” means a private, nonsectarian establishment or individual that provides related services necessary for an individual with exceptional needs to benefit educationally from the pupils' educational program pursuant to an individualized education program and that is certified by the department. It does not include an organization or agency that operates as a public agency or offers public service, including, but not limited to, a state or local agency, an affiliate of a state or local agency, including a private, nonprofit corporation established or operated by a state or local agency, a public university or college, or a public hospital. The nonpublic, nonsectarian agency shall also meet standards as prescribed by the superintendent and board.

Note: “NPAs can consist of one or multiple service providers that are contracted by districts and NPSs. NPAs are generally associated with different types of therapies. In the past, school districts may have been more likely to use NPAs rather than their own employees because under prior law the state paid 70 percent of these costs. Upon implementation of AB 602, however, districts may be more likely to hire their own therapists to work with special education students.”

Reference: *Special Education: Nonpublic School and Agency Study*, Thomas Parrish, Project Director, 1998.

Nonpublic School (NPS)

The “Nonpublic School Costs and Number of Pupils Served” are listed in **Figure 14**. Listed below are observations regarding NPS costs.

- In FY 2011-12, total NPS costs were reported at \$2,881,470.39 and \$2,478,259.53 in FY 2015-16.
- Although the number of NPS pupils significantly decreased from 133 in FY 2011-12 to 83 in FY 2015-16, NPS costs did not decrease proportionately.
- There was a cost reduction with Oak Gove Institute and Somerset Educational Services; however, there was a notable cost increase with Bright Futures Academy and Port View Preparatory.

Figure 14 – Nonpublic School Costs and Number of Pupils Served

A	B	C	D	E	F
Description Nonpublic School	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16
Blind Children’s Learning Center	32,189.45	1,114.70			
Bright Futures Academy		642,792.19	600,719.62	567,599.59	669,617.27
Childhelp Incorporated					4,654.76
Cody Educational Enterprises	280,544.59	195,965.01	86,767.26	65,335.94	
Kids Behavioral Health of Alaska	20,055.00				
Oak Grove Institute	346,072.14	118,431.25	145,003.91	121,293.09	45,974.19
Oak Grove at the Ranch					78,507.79
Port View Preparatory, Incorporated				103,357.45	319,967.10
Somerset Educational Services, Incorporated	797,374.51	353,926.23	255,319.32	196,203.73	248,152.87
Starting Gate Educational Services	1,405,234.70	1,862,673.14	1,525,781.04	1,411,531.83	1,111,385.55
Total NPS Pupils	133	128	97	97	83
Total NPS Costs	2,881,470.39	3,174,902.52	2,613,591.15	2,465,321.63	2,478,259.53
Percentage Change From Prior Year		10.18%	(17.68%)	(5.67%)	0.52%

As shown in **Figure 14** above, the NPS costs for Starting Gate Educational Services (“Starting Gate”) increased from \$1,405,234.70 in FY 2011-12 to \$1,862,673.14 in FY 2012-13. However there was a decrease in costs each subsequent year to a low of \$1,111,385.55 in FY 2015-16.

As part of the NPS review, the Master Contract with Starting Gate was reviewed, as this is a unique NPS program. Starting Gate is located on a District campus and was established to allow more District ownership of NPS pupils in collaboration with that NPS as well as a goal to reduce costs while maintaining the same quality of program. The rate for the first 60 pupils was reported at \$75.77 per day, with each additional pupil (after 60) at \$116.77 per day. These rates appear to be lower than other NPS rates.

In reviewing the Starting Gates Master Contract language, there are no references to the costs of books/supplies and it appears that the District could be covering these costs. This may warrant further analysis to determine if the District is providing any other items or support that is not typical when contracting with a NPS. Starting Gate makes “Facilities Use Payments” to RUSD that have been summarized in **Figure 15**.

Figure 15 – Starting Gate Educational Services Facilities Use Payments to Riverside Unified

A	B	C	D	E
Facilities Use Payments	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16
Starting Gate Educational Services	10,080.51	10,679.93	15,191.24	11,716.52

Nonpublic Agency (NPA)

Total “Nonpublic Agency Costs” are provided in **Figure 16**. Listed below are observations regarding NPA costs.

- Total NPA costs decreased with a high of \$2,586,340.09 in FY 2011-12 to a low of \$1,770,266.17 in FY 2015-16.
- There was a significant decrease of 34.38 percent in costs from FY 2011-12 to FY 2012-13, with another significant decrease of 12.60 percent from FY 2014-15 to FY 2015-16.

The District reported that it has built capacity related to Applied Behavior Analysis (ABA) and created a cadre of behavior intervention specialized staff members.

Figure 16 – Nonpublic Agency Costs

A	B	C	D	E	F
Description Nonpublic Agency	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16
Academy Business Services	691,981.36				
A.C.C.E.S.S. Incorporated			16,151.00	65,541.50	67,000.96
Applied Behavior Consultants Incorporated	86,183.46	98,018.80	84,746.86	136,741.33	119,295.26
Autism Behavior Consultants, Incorporated	339,590.05	407,494.71	473,859.54	585,172.18	550,897.99
Autism Spectrum Consultants	54,157.64				
Carolyn E Wylie Center	150,441.61	94,957.49			
Center for Autism and Related Services	377,076.12	238,948.11	360,398.79	219,218.02	209,892.78
Coyne and Associates Education	385,324.80	357,209.01	347,214.58	337,318.40	291,423.03
Dr Janet Kohtz	9,053.68	9,720.00	10,870.00	23,070.00	21,580.00
EMQ Families First			13,047.39		
Hope, Incorporated			14,589.39	49,185.51	
Pristine Rehab Care				169,125.00	
Russo, Fleck and Associates	492,531.37	482,608.47	497,759.09	397,865.71	356,960.00
Senseabilities, Speech- Language				33,375.00	96,215.00
Up & Movin' Pediatric PT		8,301.25	38,176.25	40,342.06	57,001.15
Other (Transfer)				(31,448.72)	
Total NPA Costs	2,586,340.09	1,697,257.84	1,856,812.89	2,025,505.99	1,770,266.17
% Change from Prior Year		(34.38%)	9.40%	9.09%	(12.60%)

Legal Expenses

The “Legal Expenses” from Special Education and General Fund are shown in **Figure 17**, with increases and decreases or fluctuations across fiscal years. Combined, legal expenses increased by 84.72 percent or \$384,034.76 from FY 2014-15 to FY 2015-16. During that same time period, General Fund legal expenses increased at a higher rate of 87.70 percent as compared to Special Education legal expenses at 80.21 percent.

Special Education expenses in **Figure 17** are limited to attorney and legally related fees. They are not inclusive of services provided through settlement agreements, such as NPS placements, NPA services, or additional related services provided directly by the District.

Fluctuations in Special Education legal expenses would depend on legal proceedings that might occur within a school year. In some situations a school district has the obligation to file for a due process hearing in order to ensure that the child’s educational rights are being protected.

Figure 17 – Legal Expenses – Special Education and General Fund

A	B	C	D	E	F
Legal Expenses	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16
Special Education	399,149.91	137,377.18	204,984.08	180,349.16	325,000.00
Difference in Special Education from Prior Year		(261,772.73)	67,606.90	(24,634.92)	144,650.84
% Change in Special Education from Prior Year		(65.58%)	49.21%	(12.02%)	80.21%
General Fund	363,463.81	327,735.79	268,031.30	272,948.53	512,332.45
Difference in General Fund from Prior Year		(35,728.02)	(59,704.49)	4,917.23	239,383.92
% Change in General Fund from Prior Year		(9.83%)	(18.22%)	1.83%	87.70%
Total Legal Expenses	762,613.72	465,112.97	473,015.38	453,297.69	837,332.45
Difference in Total Legal Expenses from Prior Year		(297,500.75)	7,902.41	(19,717.69)	384,034.76
% Change in Total Legal Expenses from Prior Year		(39.01%)	1.70%	(4.17%)	84.72%

SPECIAL EDUCATION MAINTENANCE OF EFFORT

Background Information

The Special Education Maintenance of Effort (SEMOE) reports are used to obtain the numbers needed to determine if a local educational agency (LEA) met the maintenance of effort required by the federal Individuals with Disabilities Education Act (IDEA) and implementing regulations. The IDEA requires that amounts received under Part B of IDEA shall not be used, except in specified situations, to reduce the level of expenditures for the education of children with disabilities, on an aggregate or per capita basis, made by the LEA from combined state and local funds, or from local funds only, below the level of those expenditures for the preceding fiscal year (20 *United States Code* Section 1413 and 34 *Code of Federal Regulations* Section 300.203).

Each year's SEMOE requirement is based on the amount that was expended in the last year that the LEA maintained effort. To determine compliance with this requirement, two sets of comparisons are done for each fiscal year: (1) the SEMB at the beginning of the year, when the special education **budget** is compared with the prior year's **actual** expenditures to determine if an LEA is eligible to receive the IDEA entitlement grant (eligibility test); and, (2) the SEMA after the end of the year, when the special education **actual** expenditures for that year are compared with those **actual** expenditures for the prior year to determine if an LEA is in compliance with the IDEA SEMOE requirements (compliance test).

The comparisons verify if the level of effort required was met on an aggregate expenditures basis or on a per capita basis. The comparisons are applied to the combined state and local expenditures and to local expenditures only. The "local expenditures only" method is not another requirement that must be met; rather it is an option that is available for the LEA to use if the requirement is not met based on combined state and local expenditures.

The LEA may reduce the level of expenditures below the level of the preceding fiscal year if the reduction is attributable to any of the following reasons. These allowable expenditures are listed below.

1. The voluntary departure, by retirement or otherwise, or departure for just cause, of certificated and/or classified special education or related services personnel (does not include contract renewal or staff lay-off due to budget shortfall).
2. A decrease in the enrollment of children with disabilities.
3. The termination of the obligation to provide a program of special education to a particular child with a disability that is an exceptionally costly program because:
 - A. Child has left the jurisdiction of the agency; *OR*
 - B. Provide free and appropriate public education (FAPE) to the child has terminated;
OR
 - C. 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).

Reference: "Exempt Reductions to Maintenance of Effort" worksheet pursuant to IDEA Regulations 34 CFR § 300.204, revised 4-23-25

The LEA that has a "meets requirement" compliance determination under IDEA, Section 613(a) and that is not found significantly disproportionate for the current year is eligible to reduce its SEMOE requirement by utilizing the "50 Percent Rule". Under federal law and regulations, an LEA may reduce its required SEMOE by not more than 50 percent of the increase in IDEA Part B Section 611 funding, minus the amount of Part B funds the LEA is required to use for early intervening services (EIS). The LEA must use an amount of state or local funds equal to the reduction in the required level of expenditures used in this section, to carry out activities that could be supported with funds under the Elementary and Secondary Education Act of 1965 (ESEA), regardless of whether the LEA is using funds under the ESEA for those activities (IDEA of 2004, Section 613(a)(2)(C)).

Reference: Language except from the 2014-15 SACS Software Maintenance of Effort Instructions

Note: The field is awaiting guidance on the new subsequent year's rules. The SACS SEMOE SEMA/SEMB forms will include this information.

Special Education Maintenance of Effort Reports

A method for identifying the general fund contribution is to review the SEMOE reports, Object Code 8980, “Contribution from Unrestricted Revenues to Federal Resources” and “Contribution from Unrestricted Revenues to State Resources.” In **Figure 18**, a summary of the SEMOE reports for RUSD is outlined. This table appears on the following two pages.

Typically, the entire cost of special education services is not covered by special education revenue. As such, districts need to make contributions from unrestricted revenues to ensure that the required IEP needs of students are met. These contributions are sometimes referred to as general fund contribution, contribution from unrestricted revenue, local contribution, in-kind contribution, or encroachment. For purposes of this discussion, the term “contribution” will be used.

A critical comparison is to determine if there has been a pattern of increased contributions from unrestricted revenue from one fiscal year to the next. Listed below include observations regarding RUSD’s contribution.

- Contribution increased steadily from a low of \$13,019,059.59 in FY 2011-12 to a high of \$46,820,556.00 budgeted in FY 2016-17.
- Contribution increased by 61.80 percent from FY 2012-13 to FY 2013-14, and another 27.43 percent from FY 2015-16 to budgeted FY 2016-17.
- A pattern of increased contribution is clearly apparent with implementation of LCFF in 2013-14, as the transfer of revenue limit dollars for special education pupils in Object Code 8091 no longer exists.

Many school districts are concerned regarding large increases in MOE. The following information was included in the California SELPA Administrators’ Meeting Finance Report (September 2016):

“Revenue limit transfer was removed when LCFF was implemented; Special Education has received little funding (1 percent COLA last year, no COLA this year); staff compensation; benefits increases; STRS and PERS increases; AB 602 is not fully funded. We are receiving a little over 97 cents on each dollar.”

In reviewing the District’s Local Control and Accountability Plan (LCAP), there is no specific language to address the needs of student with disabilities, as well as to help offset the deficit due to the elimination of revenue limit dollars transfers.

Figure 18 – District Special Education Maintenance of Effort Reports

A	B	C	D	E
SEMA Comparison	Actuals FY 2011-12	Actuals FY 2012-13	Difference	% Change
Total Expenditures	68,853,695.16	68,540,037.18	(313,657.98)	(0.46%)
Federal Expenditures	8,974,163.78	8,055,075.70	(919,088.08)	(10.24%)
State and Local Expenditures	56,879,531.18	60,484,961.48	3,605,430.30	6.34%
Special Education Pupil Count	4,537	4,710	173	3.81%
Per Capita State/Local	12,536.82	12,841.82	305.00	2.43%
Local Expenditures	22,015,142.10	25,521,591.25	3,506,449.15	15.93%
Per Capita Local	4,852.36	5,418.60	566.24	11.67%
Total Contribution/	13,019,059.59	15,634,880.55	2,615,820.96	20.09%

A	B	C	D	E
SEMA Comparison	Actuals FY 2012-13	Actuals FY 2013-14	Difference	% Change
Total Expenditures	68,540,037.18	69,665,501.21	1,125,464.03	1.64%
Federal Expenditures	8,055,075.70	8,011,261.67	(43,814.03)	(0.54%)
State and Local Expenditures	60,484,961.48	61,654,239.54	1,169,278.06	1.93%
Special Education Pupil Count	4,710	4,685	(25)	(0.53%)
Per Capita State/Local	12,841.82	13,159.92	318.11	2.48%
Local Expenditures	25,521,591.25	33,819,220.76	8,297,629.51	32.51%
Per Capita Local	5,418.60	7,218.62	1,800.01	33.22%
Total Contribution	15,634,880.55	25,296,731.23	9,661,850.68	61.80%*

A	B	C	D	E
SEMA Comparison	Actuals FY 2013-14	Actuals FY 2014-15	Difference	% Change
Total Expenditures	69,665,501.21	75,857,158.31	6,191,657.10	8.89%
Federal Expenditures	8,011,261.67	7,860,779.71	(150,481.96)	(1.88%)
State and Local Expenditures	61,654,239.54	67,996,378.60	6,342,139.06	10.29%
Special Education Pupil Count	4,685	4,677	(8)	(0.17%)
Per Capita State/Local	13,159.92	14,538.46	1,378.55	10.48%
Local Expenditures	33,819,220.76	38,177,136.80	4,357,916.04	12.89%
Per Capita Local	7,218.62	8,162.74	944.12	13.08%
Total Contribution	25,296,731.23	30,161,986.28	4,865,255.05	19.23%

***Note:** The significant percentage increase was due to the implementation of LCFF, eliminating revenue limit transfer dollars.

Figure 18 (continued) – District Special Education Maintenance of Effort Reports

A	B	C	D	E
SEMA Comparison	Actuals FY 2014-15	Actuals FY 2015-16	Difference	% Change
Total Expenditures	75,857,158.31	89,199,491.24	13,342,332.93	17.59%
Federal Expenditures	7,860,779.71	8,660,060.95	799,281.24	10.17%
State and Local Expenditures	67,996,378.60	80,539,430.29	12,543,051.69	18.45%
Special Education Pupil Count	4,677	4,692	15	0.32%
Per Capita State/Local	14,538.46	17,165.27	2,626.81	18.07%
Local Expenditures	38,177,136.80	47,133,281.76	8,956,144.96	23.46%
Per Capita Local	8,162.74	10,045.46	1,882.72	23.06%
Total Contribution	30,161,986.28	36,742,891.23	6,580,904.95	21.82%

A	B	C	D	E
SEMB Comparison *	Actuals FY 2015-16	Budgeted FY 2016-17	Difference	% Change
Total Expenditures	80,561,538.81	88,570,005.00	8,008,466.19	9.94%
Federal Expenditures	8,660,060.95	8,010,540.00	(649,520.95)	(7.50%)
State and Local Expenditures	71,901,477.86	80,559,465.00	8,657,987.14	12.04%
Special Education Pupil Count	4,692	4,705	13	0.28%
Per Capita State/Local	15,324.27	17,122.10	1,797.83	11.73%
Local Expenditures	47,133,281.76	55,820,698.00	8,687,416.24	18.43%
Per Capita Local	10,045.46	11,864.12	1,818.66	18.10%
Total Contribution	36,742,891.23	46,820,556.00	10,077,664.77	27.43%

*PCRA (Program Cost Report Allocations) are not included on SEMB report calculation.

The “Percentage of Total Special Education Expenditures Supported by Local Funds,” displayed in **Figure 19**, was calculated by using the information from **Figure 18**. The District’s contribution ranged from a low of 18.91 percent in FY 2011-2012 to a high of 39.76 percent in 2016-17.

The percentage of RUSD’s total Special Education expenditures to local contribution as compared to the statewide percentage of total expenditures to local funds has been consistently lower for FY 2011-12 through 2014-15. The most current statewide data available is FY 2014-15.

Reference: *Percentage of Total Special Education Expenditures Supported by State, Federal, and Local Funds*, Coalition for Adequate Funding for Special Education, Updated February 4, 2016.

Note: The Coalition is comprised of nine regions of member school agencies representing participating SELPAs across the state, of which, RUSD is a member of the 2016 Steering Committee.

Figure 19 – Percentage of Total Special Education Expenditures Supported by Local Funds

A	B	C	D	E	F	G
Fiscal Year	Actuals FY 2011-12	Actuals FY 2012-13	Actuals FY 2013-14	Actuals FY 2014-15	Actuals FY 2015-16	Budgeted FY 2016-17
RUSD Total Expenditures	68,853,695.16	68,540,037.18	69,665,501.21	75,857,158.31	80,561,538.81	88,570,005.00
RUSD Local Contribution	13,019,059.59	15,634,880.55	25,296,731.23	30,161,986.28	36,742,891.23	46,820,556.00
RUSD: % of Total Expenditures to Local Contribution	18.91%	22.81%	36.31%	39.76%	45.61%	52.86%
Statewide: % of Total Expenditures to Local Funds	52.15%	52.52%	55.85%	58.93%	NA	NA
Difference	(33.24%)	(29.71%)	(19.54%)	(19.17%)	NA	NA

In order to understand the financial impact of the District's contribution, different measurements are presented in **Figure 20**. Total contributions were divided by three different components: (1) total enrollment; (2) total P-2 ADA; and, (3) Special Education Unduplicated Count (UPC). For example, in FY 2015-16, the contribution by total enrollment was \$865.31; by total K-12 ADA was \$917.28; and, by SPED UPC was \$7,830.97.

Note: The UPC is the number of pupils receiving special education services reported annually on the CASEMIS pupil count information as of December 1. Although a special education student may be receiving multiple services, each pupil is counted only once for the UPC.

Figure 20 – Comparison of Contributions by Total Enrollment, Average Daily Attendance, and Unduplicated Special Education Pupil Count by Riverside Unified as District of Service

A	B	C	D	E	F	G	H
Fiscal Year	Total Enroll. (CBEDS)	Total P-2 ADA	SPED UPC	Total Contribution	Contribution by Total Enrollment (Col E ÷ B)	Contribution by Total P-2 ADA (Col E ÷ C)	Contribution by SPED UPC Pupil Count (Col E ÷ D)
2011-12	42,403	40,364.03	4,537	\$13,019,059.59	\$307.03	\$322.54	\$2,869.53
2012-13	42,560	40,393.36	4,710	\$15,634,880.55	\$367.36	\$387.07	\$3,319.51
2013-14	42,587	40,569.45	4,685	\$25,296,731.23	\$594.00	\$623.54	\$5,399.52
2014-15	42,339	40,294.86	4,677	\$30,161,986.28	\$712.39	\$748.53	\$6,449.00
2015-16	42,462	40,056.40	4,692	\$36,742,891.23	\$865.31	\$917.28	\$7,830.97

Source: California Department of Education Dataquest for Enrollment, AB 602 Average Daily Attendance (ADA), District CASEMIS Reports for Pupil Count, District SEMOE Reports for Contribution

PHASE ONE: FINDINGS

- With Local Control Funding Formula (LCFF), transfer of revenue limit dollars for special education students was eliminated, and as such the deficiency of special education revenue to expenditures increased requiring additional contribution from the General Fund.
- In reviewing the Local Control and Accountability Plan (LCAP), there is no specific language to address the needs of student with disabilities, as well as help offset the deficit due to the elimination of revenue limit dollars transfers.
- With substantial increases in Mental Health Services funding from one fiscal year to the next, RUSD continues to have a large excess of revenue to expenditures in Resource Code 5640.
- There is a significant ending fund balance in the LEA Medi-Cal Billing Option Program.
- Although the number of nonpublic school (NPS) pupils significantly decreased across the fiscal years studied, the NPS costs did not decrease proportionately.
- The nonpublic agency (NPA) costs decreased across the fiscal years studied, which could indicate that District employees are providing these related services as needed. For example, RUSD built capacity related to Applied Behavior Analysis (ABA) and created a cadre of behavior intervention specialized staff members.
- Combined legal expenses from Special Education and the General Fund increased by approximately \$384,000 or 85 percent from FY 2014-15 to FY 2015-16.
- Contributing areas identified that may have created and/or increased excess costs include:
 - a. Less Assembly Bill (AB) 602 state entitlement due to declining average daily attendance;
 - b. Elimination of transfer of revenue limit dollars due to implementation of LCFF;
 - c. Series of negotiated certificated and classified salary agreements, as well as an increase in services to students in the form of increasing daily instructional hours;
 - d. Capping special education class sizes resulting in opening additional classes;
 - e. Higher number of identified pupils with speech and language development needs requiring speech pathology related services; and,
 - f. Providing more services to accommodate pupils enrolled under District of Choice and inter-district permits.

PHASE ONE: RECOMMENDATIONS

Based on the financial audit of state and federal revenue and expenditures for special education programs conducted for Fiscal Years 2011-12 through 2016-17, the following preliminary recommendations are provided for the District's consideration in order to maximize existing revenue and/or reduce the contribution from the general fund to special education, where appropriate.

- Business and special education personnel need to continue to work together to monitor special education expenditures as well as the impact on the General Fund.
 - ✓ Study line items across object codes 1xxx's through 3xxx's in certificated salaries, classified salaries, and employee benefits, which reveal a notable percent increase and/or decrease to determine any specific areas that could result in contributing to increased excess costs.
 - ✓ Continue to analyze the Special Education Maintenance of Effort (SEMOE) reports to identify those expenditures that could be functions of general education (e.g., portion of school psychologist and behaviorist salaries related to initial assessment, counseling or crisis intervention for general education students).
- During the review cycle of the Local Control and Accountability Plan (LCAP), consider specific language to address the needs of students with disabilities, as well as to help offset the deficit due to the elimination of revenue limit dollars transfers.
- The significant Ending Fund Balance in Mental Health Services funding warrants further analysis to include developing a master plan that facilitates expenditures for identified priorities, while maintaining adequate funds for any discrepancies identified in the audit process. When developing a plan in providing educationally related school-based mental health services, RUSD needs to ensure that all pupils receiving services under the 500 Category service codes are included as part of the allocation of Assembly Bill (AB) 114 dollars.
- The Medi-Cal Collaborative needs to work closely with Business Services in developing a Local Educational Agency (LEA) plan that facilitates expenditures for identified priorities, while maintaining adequate funds for any discrepancies identified in the audit process.
- Although the Nonpublic School (NPS) costs of Starting Gate Educational Services decreased across the fiscal years studied, further analysis is warranted to determine if the District is providing any other items or support that is not typical when contracting with a NPS.
- Further analyze if any of the increases and/or fluctuations from one year to the next in "Classified Salaries" could be the result of the number of one-on-one instructional aide time.

PHASE TWO: COMPARATIVE DATA AND ANALYSIS

PREFACE

In order to determine operational functions and service deliveries that have financial implications, special education pupil count data were analyzed and when appropriate compared to statewide averages and benchmarks. This information included, but was not limited to: number and percent of students identified by disability group, grade level, and age range; type and frequency of services provided to special education students; percentage of time students (by disability) were served in general education classes and other instructional settings; and, special education enrollment trends compared to total enrollment.

A series of tables have been presented in this section to compare the District's special education pupil count to District total enrollment and statewide averages. Specific data analysis was conducted as follows:

- Comprehensive analysis of District special education pupil count data by disability factors, grade levels, age ranges, instructional setting, and type of services provided;
- Comparison of District special education pupil count to District K-12 enrollment information, specifically in consideration of declining enrollment; and,
- Contrast of District K-12 enrollment and special education pupil count demographics to statewide benchmarks.

For the purpose of this study, the RUSD provided and validated District pupil count information from the California Special Education Management Information System (CASEMIS).

BACKGROUND INFORMATION

Pupil count is reported by two categories: (1) District of Residence (**DOR**); and, (2) District of Service (**DOS**). The **DOR** count includes those pupils who are residents of the school district; whereas, the **DOS** count includes the students served by that district, which could include those students residing in other districts.

The **DOR** pupil count is an “unduplicated” count that represents the primary disability and constitutes only one count for each pupil residing within that district. That pupil may have a secondary disability or receiving multiple special education services. Although a pupil may have been diagnosed with more than one disability or is receiving multiple services, each pupil is counted only once for the **DOR** unduplicated count. The primary instructional setting for those unduplicated counts could be special day class (SDC), resource specialist program (RSP), home/hospital setting, hospital/institution, state school (e.g., California School for the Deaf), or nonpublic school.

Federal and State Statute

CA EC § 56031(b) reads:

- (a) “Special education,” in accordance with Section 1401(29) of Title 20 of the United States Code, means specially designed instruction, at no cost to the parent, to meet the unique needs of individuals with exceptional needs, including instruction conducted in the classroom, in the home, in hospitals and institutions, and other settings, and instruction in physical education.
- (b) In accordance with Section 300.39 of Title 34 of the Code of Federal Regulations, special education includes each of the following, if the services otherwise meet the requirements of subdivision (a):
 - (1) Speech-language pathology services, or any other designated instruction and service or related service, pursuant to Section 56363, if the service is considered special education rather than a designated instruction and service or related service under state standards.
 - (2) Travel training.
 - (3) Vocational education.
- (c) Transition services for individuals with exceptional needs may be special education, in accordance with Section 300.43(b) of Title 34 of the Code of Federal Regulations, if provided as specially designed instruction, or a related service, if required to assist an individual with exceptional needs to benefit from special education.
- (d) Individuals with exceptional needs shall be grouped for instructional purposes according to their instructional needs.

In determining whether specific services may be considered “special education” (unduplicated services count) and not a “related service,” specific terms need to be defined. Title 34 of the Code of Federal Regulations (CFR) 300.39(b)(3) defines specially designed instruction, travel training, vocational education, and physical education as:

§ 300.39 Special education.

- (a) *General.* (1) Special education means specially designed instruction, at no cost to the parents, to meet the unique needs of a child with a disability, including—
 - (i) Instruction conducted in the classroom, in the home, in hospitals and institutions, and in other settings; and
 - (ii) Instruction in physical education.
- (2) *Special education* includes each of the following, if the services otherwise meet the requirements of paragraph (a)(1) of this section—
 - (i) Speech-language pathology services, or any other related service, if the service is considered special education rather than a related service under State standards;
 - (ii) Travel training; and
 - (iii) Vocational education.
- (b) *Individual special education terms defined.* The terms in this definition are defined as follows:
 - (1) *At no cost* means that all specially-designed instruction is provided without charge, but does not preclude incidental fees that are normally charged to nondisabled students or their parents as a part of the regular education program.
 - (2) *Physical education* means—
 - (i) The development of—
 - (A) Physical and motor fitness;
 - (B) Fundamental motor skills and patterns; and
 - (C) Skills in aquatics, dance, and individual and group games and sports (including intramural and lifetime sports); and

- (ii) Includes special physical education, adapted physical education, movement education, and motor development.
- (3) *Specially designed instruction* means adapting, as appropriate to the needs of an eligible child under this part, the content, methodology, or delivery of instruction—
- (i) To address the unique needs of the child that result from the child’s disability; and
- (ii) To ensure access of the child to the general curriculum, so that the child can meet the educational standards within the jurisdiction of the public agency that apply to all children.
- (4) *Travel training* means providing instruction, as appropriate, to children with significant cognitive disabilities, and any other children with disabilities who require this instruction, to enable them to—
- (i) Develop an awareness of the environment in which they live; and
- (ii) Learn the skills necessary to move effectively and safely from place to place within that environment (e.g., in school, in the home, at work, and in the community).
- (5) *Vocational education* means organized educational programs that are directly related to the preparation of individuals for paid or unpaid employment, or for additional preparation for a career not requiring a baccalaureate or advanced degree.
- (Authority: 20 U.S.C. 1401(29))

The services referenced above could be stand-alone services if it is required to adapt the content, methodology, or delivery of instruction in order to address the unique needs of the child and ensure access to the general curriculum, so that the child can meet the educational standards of the District that apply to all children. The emphasis is clearly on “instruction” and access to the general curriculum. The stand-alone services are listed below.

- Physical education (including APE)
- Speech-language pathology services
- Travel training
- Vocational education
- Transition services, IF provided as specially designed instruction

The “Duplicated” service count involves designated instruction and services which means related services as that term is defined in Section 1401(26) of Title 20 of the United States Code and Section 300.34 of Title 34 of the CFR). Related services are supportive services required to assist a student to benefit from special education. The definition and list of related services can be found in CA EC § 56363 (a)–(c).

COMPARISON OF SPECIAL EDUCATION PUPIL COUNT TO TOTAL ENROLLMENT

Introduction

A number of sources were used in completing Phase Two of this Special Education Review. The comparison data comprise of the CASEMIS reports provided by RUSD and enrollment data gathered from the California Department of Education (CDE) DataQuest website.

The RUSD provided the CASEMIS *Special Education Enrollment Data Reports* as listed below.

1. *Special Education Annual Data Comparison Report* (by disability) for reporting cycles December 1, 2003 through December 1, 2015.

2. Special Education Enrollment Data Reports for reporting cycles December 2011, 2012, 2013, 2014, and 2015 by **DOR** and **DOS**:
 - a. Age by Disability
 - b. Age by Ethnicity
 - c. Grade by Disability
 - d. Grade by Ethnicity
 - e. Ethnicity by Disability
 - f. Service by Disability
 - g. Service and Age
 - h. Percent of Time Inside Regular Class by Disability

The following source was used for Special Education Enrollment Data Reports for reporting cycles December 1, 2004 through December 1, 2015: CDE DataQuest, Special Education Demographics by **DOS**.

The following sources were used for state and district K-12 enrollment for reporting cycles 2004 through 2015:

1. CDE DataQuest K-12 Enrollment Demographics by California Basic Education Data System (CBEDS); or,
2. California Longitudinal Pupil Achievement Data System (CALPADS) (depending on the reporting cycle year as found on the CDE DataQuest website).

All available enrollment data were analyzed, with specific information summarized for the purposes of this report. A series of worksheets with more detailed information for December 2011 through December 2015 by **DOR** and **DOS** will be provided to the District under separate cover for reference purposes. The tables presented within this report are, for the most part, summaries of the detailed worksheets.

Differences in Pupil Count Information by District of Residence and District of Service

There are significant differences in the **DOR** pupil count information reported by RUSD in its CASEMIS reports as compared to the CDE DataQuest. As shown in **Figure 21**, the RUSD CASEMIS pupil count ranged between 132 (Row 3, Column D) and 156 (Row 3, Column B) less than the pupil count posted on the CDE DataQuest website. This reason is that the CDE DataQuest contains RUSD DOR information reported by all SELPAs throughout the state – for example California for the School of the Deaf, Riverside (CSDR).

On the other hand, the **DOS** reports indicate a more consistent picture because there is a difference of three pupils between RUSD CASEMIS reports and DataQuest (Row 6). The three additional pupils could have involved duplicated counts, and as such, deleted by CDE.

It was shared by RUSD Special Education Department that parents move into its District so their children can be served at the California School for the Deaf, Riverside (CSDR). The RUSD provides administrative support and other operational services to enhance the education of the pupils. It was reported that there are approximately 120 RUSD pupils served at CDSR.

Figure 21 – Difference in Special Education Pupil Count by DOR and DOS as Reported in CASEMIS and DataQuest, December 2011–2015

A	B	C	D	E	F
District of Residence (DOR)	2011	2012	2013	2014	2015
(Row 1) RUSD DOR from CASEMIS	4,522	4,692	4,667	4,659	4,620
(Row 2) RUSD DOR from DataQuest	4,678	4,835	4,799	4,796	4,754
(Row 3) DOR Difference between CASEMIS and DataQuest	(156)	(143)	(132)	(137)	(134)

District of Service (DOS)	2011	2012	2013	2014	2015
(Row 4) RUSD DOS from CASEMIS	4,539	4,710	4,686	4,677	4,692
(Row 5) RUSD DOS from DataQuest	4,537	4,710	4,685	4,677	4,692
(Row 6) DOS Difference between CASEMIS and DataQuest	2	0	1	0	0

With regard to the **DOS** data, RUSD CASEMIS reports contain all special education pupils served within its District. The RUSD has provided services for pupils residing in thirteen different districts based on CASEMIS data reviewed from December 2011 through December 2015. These districts are listed below.

1. Alvord USD
2. Corona-Norco USD
3. Hemet USD
4. Jurupa USD
5. Moreno Valley USD
6. Perris Elementary SD
7. Perris Union HSD
8. Lake Elsinore USD
9. Val Verde USD
10. Chino USD
11. Colton Joint USD
12. Ontario-Montclair Elementary SD
13. San Bernardino City USD

It was reported by RUSD Special Education Department that representatives from the school districts listed above do not participate in the educational process of those districts' resident pupils receiving services provided by RUSD. These districts do not send staff to IEP meetings and are not involved in the educational process of their resident pupils. Also, the costs of all special education services are covered by RUSD.

Although RUSD assumes all financial and educational responsibility, these pupils are reported as **DOS**. There are no contracts or inter-SELPA permits that allow RUSD to determine excess costs for IEP-required programs and services rendered.

Impact on Funding and Accountability by District of Residence Versus District of Service

The **DOR** and **DOS** pupil count information was analyzed further to determine the impact on funding and accountability as a result of RUSD's reporting practices.

As shown in **Figure 22**, on December 1, 2015, RUSD reported a **DOR** pupil count of 4,620 (Row 1, Column F), as compared to a **DOS** pupil count of 4,692 (Row 2, Column F). This represents a difference of 72 non-resident pupils (Row 3, Column F) who received services provided by RUSD. It appears that RUSD is incorrectly reporting these pupils only by **DOS**. Instead, RUSD should be recorded as **DOR** and **DOS**, on their CASEMIS reports, rather than other districts being recorded as **DOR**.

The increase in pupil count and percentage change from prior year by **DOR** and **DOS** is shown in **Figure 22**. Notable observations are listed below.

- There were 72 less pupils reported by **DOR** (4,620) as compared to **DOS** (4,692). (Row 3, Column F).
- There was a decrease of 39 pupils by **DOR** from 2014 to 2015 (Row 4, Column F), but an increase of 15 pupils by **DOS** (Row 5, Column F).

These differences warrant further study by RUSD.

Figure 22 – Comparison of District Special Education Pupil Count by District of Residence (DOR) and District of Service (DOS), December 2011–2015

A	B	C	D	E	F
Description	2011	2012	2013	2014	2015
(Row 1) RUSD SPED Pupil Count by DOR	4,522	4,692	4,667	4,659	4,620
(Row 2) RUSD SPED Pupil Count by DOS	4,537	4,710	4,685	4,677	4,692
(Row 3) Difference between DOR and DOS	(15)	(18)	(18)	(18)	(72)
Difference from Prior Year		From 2011 to 2012	From 2012 to 2013	From 2013 to 2014	From 2014 to 2015
(Row 4) Increase/Decrease in SPED Pupil Count by DOR from Prior Year		170	(25)	(8)	(39)
(Row 5) Increase/Decrease in SPED Pupil Count by DOS from Prior Year		173	(25)	(8)	15

The RUSD is a District of Choice (DOC) and transfers are available for any parent of a school age student who does not live within the geographical boundaries of RUSD. Under DOC, a release is not required from their district of residence in order for parents to apply for a DOC transfer during the established application period. Under a DOC, transfer a student can remain within RUSD schools until they graduate (with some exceptions). Second, RUSD uses the Inter-District transfer request process when parents are requesting to change from their district of residence, where the parent resides, to a school within the RUSD boundaries. **Reference:** RUSD website, Pupil Services Department – Transfers for “District of Choice”

The DOC provision is authorized pursuant to CA EC §§ 48300 through 48316. Under this provision, the school district of choice determines the number of transfer pupils it is willing to accept and must ensure that pupils admitted are selected through a random, unbiased process that prohibits an evaluation of whether or not the pupil should be enrolled based on his or her academic or athletic performance. **Reference:** CDE Website, *District Transfers – Laws Regarding Intra-district and Inter-district Transfers*

Note: Pursuant to CA EC §48315, “This article shall become inoperative on July 1, 2017, and, as of January 1, 2018, is repealed, unless a later enacted statute, which becomes effective on or before January 1, 2018, deletes or extends the dates on which it becomes inoperative and is repealed.”

With regard to inter-district transfers outside of the RUSD boundaries and requests to attend schools within the Riverside Unified School District, the following applies:

- Student must first be released from their district of residence;
- Inter–District Transfers are to the district, not a particular school; and,
- RUSD will attempt to accommodate parent’s request for a particular school, but the request is not guaranteed. Placement at schools is based on space availability as determined by the district, not the school site.

Reference: RUSD website, Pupil Services Department – Transfers for “Open Enrollment Intra and Inter-District Transfers”

Furthermore, AB 2537, recently signed into law by the Governor, eliminates the July 1, 2017 expiration date for CA EC §48204(b) commonly referred to as the "Allen Bill." Section 48204 authorizes a school district to allow a non-resident student to attend school in that district so long as at least one of the student’s parents or legal guardians works within the district’s attendance boundaries.

As shown in **Figure 23**, there was a percentage decrease by **DOR** of –0.84 percent (Row 4, Column F) from 2014 to 2015 as compared to a percentage increase of 0.29 percent in K-12 enrollment (Row 6, Column F) from 2014 to 2015. On the other hand, there was a percentage increase by **DOS** of 0.32 percent (Row 5, Column F) from 2014 to 2015, which is more comparable to K-12 enrollment.

Figure 23 – Comparison of Percentage Change from Prior Year in Special Education Pupil Count by District of Residence and Service Compared to Total K-12 Enrollment, December 2011–2015

A	B	C	D	E	F
Description	2011	2012	2013	2014	2015
(Row 1) RUSD SPED Pupil Count by DOR	4,522	4,692	4,667	4,659	4,620
(Row 2) RUSD SPED Pupil Count by DOS	4,537	4,710	4,685	4,677	4,692
(Row: 3) RUSD K-12 Enrollment	42,403	42,560	42,587	42,339	42,462
Percentage Change from Prior Year		From 2011 to 2012	From 2012 to 2013	From 2013 to 2014	From 2014 to 2015
(Row 4) % Change in SPED Pupil Count by DOR from Prior Year		3.76%	(0.53%)	(0.17%)	(0.84%)
(Row 5) % Change in SPED Pupil Count by DOS from Prior Year		3.81%	(0.53%)	(0.17%)	0.32%
(Row 6) % Change in RUSD K-12 Enrollment		0.37%	0.06%	(0.58%)	0.29%
(Row 7) Difference in % Change in SPED Pupil Count by DOR and K-12 Enrollment		3.39%	(0.59%)	0.41%	(1.13%)
(Row 8) Difference in % Change in SPED Pupil Count by DOS and K-12 Enrollment		3.44%	(0.59%)	0.41%	0.03%

By reporting the pupils as **DOR**, RUSD would generate additional Low Incidence (LI) funding. Based on the 2015-16 P-2 *SELPA Special Education Funding Exhibit*, RUSD generated \$163,599.45 in LI entitlement. By reporting LI pupils by **DOS** only, RUSD cannot generate LI funding for pupils identified as having a primary or secondary LI disability. The FY 2015-16 LI rate per eligible pupil was approximately \$432.80, which will be the same for FY 2016-17. By reporting LI pupils by **DOS** and not by **DOR**, RUSD cannot generate LI finding for pupils identified as having a primary or secondary LI disability. Again, these include hearing impairments, vision impairments, severe orthopedic impairments, or any combination thereof.

The **primary** disability categories of those pupils served by RUSD as **DOS** (December 2015) were reported in the following categories: Autism; Emotional Disturbance; Intellectual Disability; Other Health Impairment; Specific Learning Disability; Speech or Language Impairment. However, for funding purposes, both primary and secondary disability categories reported on the child's IEP generate LI entitlement based on prior year LI pupil count.

Although none of the categories listed above are a LI disability, staff reported that several non-resident pupils transferred into RUSD from other districts in prior years, requiring costly assistive devices, which needed to be purchased by their District.

Comparison of Special Education Pupil Count to Total Enrollment

For the remaining tables, District **DOS** information will be utilized, as **DOS** is more representative of the number of pupils and services provided by RUSD.

The percentage of RUSD special education pupil count to total RUSD K-12 enrollment as compared to statewide average percentages for a twelve-year period is shown in **Figure 24**. The RUSD's percent of special education pupil count to total K-12 enrollment has been consistently around 10 to 11 percent across the twelve-year time period, ranging from the lowest of 10.38 percent in 2007 (Row 3, Column E) to the highest of 11.07 percent (Row 3, Column J) in 2012.

The RUSD has been reliably lower than statewide averages across the twelve-year period. With a statewide average of 11.70 percent (Row 4, Column M) in 2015, the District reported 11.05 percent (Row 3, Column M) in December 2015, as compared to the statewide average of 11.79 percent.

Figure 24 – Total District Enrollment and Comparison of District Special Education Pupil Count by District of Service and K-12 Enrollment to Statewide Averages, December 2004–2015

A	B	C	D	E	F	G	H	I	J	K	L	M
Year	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
(Row 1) RUSD DOS SPED Pupil Count	4,535	4,561	4,566	4,521	4,575	4,621	4,506	4,537	4,710	4,685	4,677	4,692
(Row 2) RUSD K-12 Enrollment	42,521	43,052	43,464	43,560	43,336	42,696	42,532	42,403	42,560	42,587	42,339	42,462
(Row 3) % RUSD SPED DOS to Total K-12 Enrollment	10.67%	10.59%	10.51%	10.38%	10.56%	10.82%	10.59%	10.70%	11.07%	11.00%	11.05%	11.05%
(Row 4) % STATE SPED Pupil Count to State K-12 Enroll.	10.79%	10.82%	10.81%	10.80%	10.85%	10.98%	10.92%	11.03%	11.16%	11.31%	11.51%	11.79%
(Row 5) % Difference: RUSD SPED DOS and STATE	(0.12%)	(0.23%)	(0.31%)	(0.42%)	(0.29%)	(0.16%)	(0.33%)	(0.33%)	(0.10%)	(0.31%)	(0.46%)	(0.74%)

State Background Information

(Row 6) STATE SPED Pupil Count	681,969	683,178	679,648	677,875	678,105	680,164	678,929	686,352	695,173	705,279	717,961	734,422
(Row 7) STATE Total K-12 Enrollment	6,322,141	6,312,436	6,286,943	6,275,469	6,252,029	6,192,121	6,217,002	6,220,993	6,226,989	6,236,672	6,235,520	6,226,737

Number/Percent of Pupils Identified by Disability Category

The number of pupils by **DOS** for each primary disability type is presented in **Figure 25**. Any percentage comparison of the LI categories will be skewed because of the limited number of students identified. Again, these disability groups include hearing impairments, vision impairments, severe orthopedic impairments, or any combination thereof.

The highlighted rows in **Figure 26** indicate that there was notable growth or decline in the pupil count for a specific disability group. The disability categories showing a notable growth from 2004 to 2015 included: Deaf; OHI; Specific SLD; MD; and, Autism. On the other hand, notable declining categories included: SLI; ED; and, OI.

The District reported that the approximately 48 percent decrease in pupil count for ED pupils (from 216 in 2004 to 112 in 2015) was the result of group homes closing in Riverside County.

Figure 25 – Total Special Education Enrollment by Disability Categories by District of Service, December 2004–2015

A	C	D	E	F	G	H	I	J	K	L	M	N
Year	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
ID	288	309	318	296	313	299	284	294	319	316	311	301
HH	45	55	52	43	48	47	45	44	51	61	59	52
DEAF	9	14	23	23	20	19	15	10	14	13	16	18
SLI	1,516	1,492	1,459	1,480	1,508	1,500	1,480	1,410	1,351	1,271	1,239	1,188
VI	36	40	35	35	28	27	26	20	15	16	17	20
ED	216	245	238	205	187	200	170	171	182	158	136	112
OI	153	145	135	131	99	81	77	67	66	57	61	58
OHI	323	359	374	385	393	414	404	442	492	496	526	565
SLD	1,746	1,691	1,689	1,629	1,649	1,651	1,599	1,650	1,767	1,811	1,781	1,806
DB	2	1	1	1	1	1	0	1	1	1	1	2
MD	38	25	19	44	56	66	67	64	66	59	60	63
AUT	152	175	211	234	258	302	324	349	376	415	458	499
TBI	11	10	12	15	15	14	15	15	10	11	12	8
Total	4,535	4,561	4,566	4,521	4,575	4,621	4,506	4,537	4,710	4,685	4,677	4,692

Legend for Disability Categories

ID: Intellectual Disability
HH: Hard of Hearing
DEA: Deaf
SLI: Speech or Language Impairment
VI: Visual Impairment
ED: Emotional Disturbance
OI: Orthopedic Impairment

OHI: Other Health Impairment
SLD: Specific Learning Disability
DB: Deaf-Blind
MD: Multiple Disabilities
AUT: Autism
TBI: Traumatic Brain Injury

The number of pupils in each of the disability categories listed above in **Figure 25** with notable increases and decreases in enrollment was converted to a percentage format in **Figure 26** by four-year cycles (Columns B C, D) and from 2004 to 2015 (Column E). The percentages for DB and VI as well as TBI will be skewed due to limited number of identified pupils.

There was a percentage **increase** in the pupil count from 2012 to 2015 (Column D) in:

- ✓ Hard of Hearing
- ✓ Deaf
- ✓ Specific Learning Disability
- ✓ Other Health Impairment
- ✓ Autism

There was a percentage **decrease** in pupil count from 2012 to 2015 (Column D) in:

- ✓ Intellectual Disability
- ✓ Speech or Language Impairment
- ✓ Emotional Disturbance
- ✓ Orthopedic Impairment
- ✓ Multiple Disability
- ✓ Traumatic Brain Injury

A comparison of statewide averages for the percentage change of pupils by disability category from 2004 to 2015 (Column F) was prepared for the purposes of the study to ascertain if RUSD was comparable for the same time period. For example, Autism increased across the state at 230.82 percent, with RUSD comparable at 228.29 percent.

Figure 26 – Percentage Change of Special Education Enrollment by Disability Categories

A	B	C	D	E		F
Year Cycle	From 2004 to 2007	From 2008 to 2011	From 2012 to 2015	From 2004 to 2015		From 2004 to 2015
ID	2.78%	(6.07%)	(5.64%)	4.51%	STATEWIDE AVERAGES from 2004 to 2015	(0.79%)
HH	(4.44%)	(8.33%)	1.96%	15.56%		35.73%
DEAF	155.56%	(50.00%)	28.57%	100.00%		(22.70%)
SLI	(2.37%)	(6.50%)	(12.07%)	(21.64%)		(9.37%)
VI	(2.78%)	(28.57%)	33.33%	(44.44%)		(23.51%)
ED	(5.09%)	(8.56%)	(38.46%)	(48.15%)		(12.88%)
OI	(14.38%)	(32.32%)	(12.12%)	(62.09%)		(23.34%)
OHI	19.20%	12.47%	14.84%	74.92%		133.83%
SLD	(6.70%)	0.06%	2.21%	3.44%		(12.21%)
DB	(50.00%)	0.00%	100.00%	0.00%		(61.28%)
MD	15.79%	14.29%	(4.55%)	65.79%		11.71%
AUT	53.95%	35.27%	32.71%	228.29%		230.82%
TBI	36.36%	0.00%	(20.00%)	(27.27%)		(2.35%)
Total	(0.31%)	(0.83%)	(0.38%)	3.46%		7.69%

One observation in **Figure 26** above would include the comparison of RUSD's percentage change of OI and MD (Column E) as contrasted to statewide benchmarks (Column F). As the identification of OI as a primary or secondary disability generates low incidence funding, while MD does not generate funds, there has been an effort statewide to identify pupils with OI rather than MD. However, it is important to reiterate that this is the decision of an IEP team.

As shown in **Figure 27**, the percentage of MD fluctuated up and down from 2012 to 2015.

<u>Disability</u>	<u>RUSD</u>	<u>STATE</u>
OI	(62.09%)	(23.34%)
MD	65.79%	11.71%

Special education enrollment is shown in **Figure 27** as a percentage of the total special education pupil count for a four-year time period from December 2012 through December 2015. The disability categories that showed continuous growth included: OHI; SLD; and Autism.

On the other hand, the disability category of ED (Column G) revealed a notable decline from 3.86 percent in 2012 to 2.39 percent in 2015. The SLI (Column E) pupil count decrease in pupil count will be discussed further under **Figure 28**.

Figure 27 – Percent of Enrollment by Disability by District of Service, December 2012–2015

A	B	C	D	E	F	G	H	I	J	K	L	M	N
SUMMARY OF SPECIAL EDUCATION PUPIL COUNT BY PERCENTAGE OF DISABILITY													
Disability	ID	HH	DEA	SLI	VI	ED	OI	OHI	SLD	DB	MD	AUT	TBI
2012	6.77%	1.08%	0.30%	28.68%	0.32%	3.86%	1.40%	10.45%	37.52%	0.02%	1.40%	7.98%	0.21%
2013	6.74%	1.30%	0.28%	27.13%	0.34%	3.37%	1.22%	10.59%	38.66%	0.02%	1.26%	8.86%	0.23%
2014	6.65%	1.26%	0.34%	26.49%	0.36%	2.91%	1.30%	11.25%	38.08%	0.02%	1.28%	9.79%	0.26%
2015	6.42%	1.11%	0.38%	25.32%	0.43%	2.39%	1.24%	12.04%	38.49%	0.04%	1.34%	10.64%	0.17%

Possible Reasons for Percentage Increases

- HH and Deaf: Families move into the RUSD to receive services from CSDR. By living in such close proximity to CSDR, families become part of the community and long transportation rides are avoided for their children.
- A higher percent of identified OHI and/or SLD pupils could indicate that several practices may not be available and/or are not consistently implemented, including but not limited to the following:
 - a. Response to Instruction and Intervention (RtI²) to integrate resources from general education, categorical programs, and special education into a comprehensive system of core instruction and interventions to benefit every pupil;
 - b. Student Study or Success Team (SST) processes to facilitate resources and pre-referral interventions for high risk pupils;

- c. Provision of resources through state and federal funded categorical programs to high-risk pupils prior to looking at special education;
- d. Availability of programs, curriculum, and means of support for reading deficits made available without identifying pupils with learning disabilities; and/or,
- e. Students not exited from special education (e.g., at the secondary level in anticipation to allow access to student support and supplemental services for post-secondary schools/programs).
- Autism has been the fastest growing disability across the United States. In 1990 under Public Law 101-476 to amend the Education for All Handicapped Children Act (EHA), a separate category was established for autism. Typically these pupils were classified under other categories depending on their primary and secondary disability indicators.

Possible Reasons for Percentage Decreases

- A higher percent of identified OHI pupils may trigger a lower percent identified as SLD. Specifically in RUSD, there was a 14.84 percent increase of OHI from 2012 to 2015 as compared to a slight increase of SLD at 2.21 percent. Typically, a higher percentage of identified OHI pupils may involve those lacking a severe discrepancy required to be eligible as a student with a learning disability. However, their educational performance may be adversely affected, for example, by attention deficit hyperactivity disorder (ADHD) demonstrating a need for special education services (CA EC § 56339 (a)).
- The decline in pupils identified as ED could be due to an increase in OHI pupils, utilizing mental health diagnoses, such as ADHD, Depression, Bipolar Disorder, Anxiety, etc.
- A decrease in the number SLI pupils could be a result of several factors, including but not limited to: (a) reclassification of pupils into the autism category; (b) speech-only students transitioning into other disability categories such as SLD or OHI; and, (c) more emphasis of speech and language development within the general and/or special education program curriculum.
- A higher percent of identified OH pupils may trigger a lower percent of MD. Orthopedic Impairment is one of the low incidence (LI) disabilities, thus generating approximately \$432.80 per LI pupil based on prior year December pupil count.

Comparison of District Special Education Pupil Count to Statewide Averages

As outlined in **Figure 28**, RUSD's special education pupil count by **DOS** was compared to statewide averages by the percentage of disability categories for 2011 through 2015. The ratio represents the number of pupils in a specific disability category divided by the total disability count. Specifically, a comparison of the disability categories SLI and SLD is highlighted below.

Although, the SLI pupil count has declined (see **Figure 27**), the District consistently has been **above** statewide averages as highlighted below.

<u>SLI</u>	<u>RUSD</u>	<u>STATE</u>	<u>Difference</u>
2011	31.08%	23.98%	7.10%
2012	28.68%	23.36%	5.32%
2103	27.13%	22.78%	4.35%
2014	26.49%	22.30%	4.19%
2015	25.32%	21.75%	3.57%

On the contrary, for **SLD**, the District consistently has been **under** statewide averages as outlined below.

<u>SLD</u>	<u>RUSD</u>	<u>STATE</u>	<u>Difference</u>
2011	36.37%	40.61%	(4.24%)
2012	37.52%	40.19%	(2.67%)
2103	38.66%	39.97%	(1.31%)
2014	38.08%	39.58%	(1.50%)
2015	38.49%	39.25%	(0.76%)

Figure 28 –Comparison of Percentage of Disability by District of Service to Statewide Averages, December 2011–2015

A	B		C		D		E		F	
Year	2011		2012		2013		2014		2015	
	RUSD	STATE	RUSD	STATE	RUSD	STATE	RUSD	STATE	RUSD	STATE
ID	6.48%	6.31%	6.77%	6.28%	6.74%	6.18%	6.65%	6.09%	6.42%	5.98%
HH	0.97%	1.46%	1.08%	1.47%	1.30%	1.47%	1.26%	1.44%	1.11%	1.41%
DEAF	0.22%	0.57%	0.30%	0.55%	0.28%	0.52%	0.34%	0.49%	0.38%	0.47%
SLI	31.08%	23.98%	28.68%	23.36%	27.13%	22.78%	26.49%	22.30%	25.32%	21.75%
VI	0.44%	0.63%	0.32%	0.59%	0.34%	0.57%	0.36%	0.54%	0.43%	0.50%
ED	3.77%	3.79%	3.86%	3.61%	3.37%	3.47%	2.91%	3.37%	2.39%	3.31%
OI	1.48%	2.08%	1.40%	1.93%	1.22%	1.83%	1.30%	1.71%	1.24%	1.60%
OHI	9.74%	9.01%	10.45%	9.57%	10.59%	10.06%	11.25%	10.67%	12.04%	11.35%
SLD	36.37%	40.61%	37.52%	40.19%	38.66%	39.97%	38.08%	39.58%	38.49%	39.25%
DB	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.04%	0.01%
MD	1.41%	0.82%	1.40%	0.87%	1.26%	0.88%	1.28%	0.90%	1.34%	0.90%
AUT	7.69%	10.46%	7.98%	11.31%	8.86%	12.01%	9.79%	12.65%	10.64%	13.23%
TBI	0.33%	0.26%	0.21%	0.25%	0.23%	0.24%	0.26%	0.24%	0.17%	0.23%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

The differences in percentages between RUSD and statewide averages from **Figure 28** were compared in **Figure 29**. For example

The District was consistently **higher** than statewide averages in the following disability categories.

- ✓ Intellectual Disability
- ✓ Speech or Language Impairment
- ✓ Other Health Impairment
- ✓ Multiple Disability

The District was consistently **lower** than statewide averages in the following disability categories:

- ✓ Hard of Hearing
- ✓ Deaf
- ✓ Visual Impairment
- ✓ Emotional Disturbance
- ✓ Orthopedic Impairment
- ✓ Specific Learning Disability
- ✓ Autism

Figure 29 – Percentage Differences of Disability Groups by District of Service to Statewide Averages, December 2011–2015

A	B	C	D	E	F
Disability	2011	2012	2013	2014	2015
PERCENTAGE DIFFERENCES BETWEEN RUSD AND STATEWIDE AVERAGES					
ID	0.17%	0.49%	0.56%	0.56%	0.44%
HH	(0.49%)	(0.39%)	(0.17%)	(0.17%)	(0.30%)
DEAF	(0.35%)	(0.25%)	(0.24%)	(0.24%)	(0.09%)
SLI	7.10%	5.32%	4.35%	4.35%	3.57%
VI	(0.19%)	(0.27%)	(0.23%)	(0.23%)	(0.07%)
ED	(0.02%)	0.25%	(0.10%)	(0.10%)	(0.92%)
OI	(0.60%)	(0.53%)	(0.61%)	(0.61%)	(0.36%)
OHI	0.73%	0.88%	0.53%	0.53%	0.69%
SLD	(4.24%)	(2.67%)	(1.31%)	(1.31%)	(0.76%)
DB	0.00%	0.00%	0.00%	0.00%	0.03%
MD	0.59%	0.53%	0.38%	0.38%	0.44%
AUT	(2.77%)	(3.33%)	(3.15%)	(3.15%)	(2.59%)
TBI	0.07%	(0.04%)	(0.01%)	0.02%	(0.06%)

Number of Pupils Served by Grade Level and Disability

The purpose of **Figure 30** is to determine if there is a clustering of specific disability categories at a specific grade level as of December 2015 by **DOS**. For specific disability categories there were high clusters of pupils identified as outlined below.

<u>Disability</u>	<u>Grade Level(s)</u>
DEAF	Infant (11 pupils)
SLI	Preschool (211 pupils) through Grade 5 (88 pupils)
ED	Grades 7 (16 pupils) through 11 (16 pupils)
OHI	Grade 4 (47 pupils) through 12 (45 pupils)
SLD	Grade 4 (135 pupils) through Grade 12 (162 pupils)
MD	Grade 6 (9 pupils) and Grade 7 (8 pupils)
AUTISM	Preschool (70 pupils)

Figure 30 – Pupil Count by Grade Level and Disability by District of Service, December 2015

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Grade	ID	HH	DEA	SLI	VI	ED	OI	OHI	SLD	DB	MD	AUT	TBI	Total	% By Grade Level
Infant	0	3	11	0	1	0	2	0	0	0	0	0	0	17	0.36%
Preschool	21	7	0	211	1	0	12	20	0	0	4	70	0	346	7.37%
K	16	0	0	175	1	0	5	9	3	0	2	35	0	246	5.24%
1	10	3	0	146	1	1	2	11	12	0	1	27	0	214	4.56%
2	13	2	0	135	0	5	1	16	51	0	0	34	0	257	5.48%
3	14	4	0	118	1	5	4	33	76	0	2	31	0	288	6.14%
4	15	2	2	108	3	4	2	47	135	0	5	31	1	355	7.57%
5	19	5	0	88	1	5	3	50	166	0	2	39	0	378	8.06%
6	15	6	0	50	2	7	3	63	170	0	9	38	1	364	7.76%
7	20	5	0	49	0	16	2	43	175	0	8	35	2	355	7.57%
8	24	5	1	30	1	9	3	50	200	0	5	37	0	365	7.78%
9	16	3	1	22	2	11	3	52	208	0	2	33	1	354	7.54%
10	23	1	1	23	3	17	3	61	201	0	2	26	0	361	7.69%
11	21	4	2	15	3	16	4	58	227	0	4	18	2	374	7.97%
12+	23	2	0	18	0	12	4	45	162	0	2	19	1	288	6.14%
Other/ Ungraded	51	0	0	0	0	4	5	7	20	2	15	26	0	130	2.77%
Total	301	52	18	1,188	20	112	58	565	1,806	2	63	499	8	4,692	100.00%

Special education pupil count by grade level was expanded to include December 2012, 2013, 2014, and 2015 enrollment data in **Figure 31** by grade level only, not including specific disability categories as shown in **Figure 30** above.

If the pupil count is followed diagonally, one could determine if there is a surge in pupil count at the next grade level. Column B, “Infant” and Column Q, “Other/Ungraded” would need to be excluded when looking across the grade levels by year. For example, if the arrows are followed in **Figure 31** at Kindergarten (Column D) in 2011, there were 205 pupils with that number increasing to 355 pupils at Grade 4 (Column H) in 2015.

It would be warranted to research the data included in Column Q, “Other/Ungraded” to ascertain why the numbers have increased from 52 in 2011 to 130 in 2015. As referenced, earlier it would be important to assign these pupils to a specific grade level.

Figure 31 – Special Education Pupil Count by Grade Level by District of Service, December 2011–2015

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
Grade	Infant	Pre	K	1	2	3	4	5	6	7	8	9	10	11	12+	Other	Total
2011	16	250	205	262	292	309	363	419	363	393	337	319	321	273	365	52	4,539
			↘					↘			↘						
2012	13	255	210	263	309	360	355	366	413	398	401	339	322	332	320	54	4,710
				↘					↘			↘					
2013	12	294	198	240	278	345	365	357	379	407	390	393	318	319	345	46	4,686
					↘					↘			↘				
2014	12	321	213	236	252	332	355	357	348	363	389	386	384	314	296	119	4,677
						↘					↘			↘			
2015	17	346	246	214	257	288	355	378	364	355	365	354	361	374	288	130	4,692

Information presented in **Figure 31** above was converted to percentages in **Figure 32**. Detailed reports for December 2011 through 2015 will be made available to the District under separate cover.

Again, if the arrows are followed in **Figure 32** at Kindergarten (Column D) in 2011, there were 4.52 percent of pupils in 2011 with the percent increasing to 7.57 percent at Grade 4 in 2015 (Column H).

Figure 32 –Percent of Special Education Pupil Count by Grade Level by District of Service, December 2011–2015

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
Grade	Infant	Pre	K	1	2	3	4	5	6	7	8	9	10	11	12+	Other
2011	0.35%	5.51%	4.52%	5.77%	6.43%	6.81%	8.00%	9.23%	8.00%	8.66%	7.42%	7.03%	7.07%	6.01%	8.04%	1.15%
			↘					↘			↘					
2012	0.28%	5.41%	4.46%	5.58%	6.56%	7.64%	7.54%	7.77%	8.77%	8.45%	8.51%	7.20%	6.84%	7.05%	6.79%	1.15%
				↘					↘			↘				
2013	0.26%	6.27%	4.23%	5.12%	5.93%	7.36%	7.79%	7.62%	8.09%	8.69%	8.32%	8.39%	6.79%	6.81%	7.36%	0.98%
					↘					↘			↘			
2014	0.26%	6.86%	4.55%	5.05%	5.39%	7.10%	7.59%	7.63%	7.44%	7.76%	8.32%	8.25%	8.21%	6.71%	6.33%	2.54%
						↘					↘			↘		
2015	0.36%	7.37%	5.24%	4.56%	5.48%	6.14%	7.57%	8.06%	7.76%	7.57%	7.78%	7.54%	7.69%	7.97%	6.14%	2.77%

Percent of Time Inside of Regular Class by Disability

The percent of time that special education pupils are served inside regular classes is shown in **Figure 33** (December 2014) and **Figure 34** (December 2015). The tables are on the following two pages.

Although the CASEMIS report is broken down by 10 percent increments, these were aggregated from 0 to 40 percent and 41 to 100 percent for the purposes of this study. The summary of these percentages is outlined below.

<u>Year</u>	<u>0 to 40%</u>	<u>41 to 100%</u>
2014	42.14%	57.86%
2015	42.28%	57.72%

This distribution would suggest that pupils are served approximately 42 percent of the time in self-contained and inclusive settings. This would not be consistent with state-imposed least restrictive environment (LRE) annual performance measures to be discussed immediately following **Figure 34**.

Another factor to consider is the percent of pupils by disability group served inside regular classes. As outlined below, the more populated disability groups of SLI, OHI, and SLD are served in regular classes between approximately 58 and 65 percent. This population would typically include pupils with mild to moderate disabilities. The state-imposed target for Indicator 5A is “inside of the regular class 80 percent or more of the day.”

<u>Year</u>	<u>Disability</u>	<u>0 to 40%</u>	<u>41 to 100%</u>
2014	SLI	20.55%	30.82%
2015	SLI	19.66%	29.47%
2104	OHI	8.32%	13.38%
2015	OHI	8.92%	14.33%
2014	SLD	26.59%	46.45%
2015	SLD	25.96%	47.67%

In comparing the percent of time inside regular classes for pupils identified with ED, they received services from 21.29 to 26.93 percent of the time at the 50 to 100 percent level.

<u>Year</u>	<u>Disability</u>	<u>0 to 40%</u>	<u>41 to 100%</u>
2014	ED	4.52%	1.74%
2015	ED	3.78%	1.37%

Figure 33 – Percent of Time Inside of Regular Class by Disability by District of Service, December 2014

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
% Time	ID	HH	DEA	SLI	VI	ED	OI	OHI	SLD	DB	MD	AUT	TBI	Sub-Total	% Time to Total
0 to 10%	100	7	10	186	2	42	25	53	48	1	42	116	2	634	13.56%
11 to 20%	113	4	1	131	1	21	14	61	216	0	15	168	2	747	15.97%
21 to 30%	48	3	1	78	1	18	4	36	177	0	1	52	2	421	9.00%
31 to 40%	31	3	0	10	0	8	3	14	83	0	2	14	1	169	3.61%
Subtotal	292	17	12	405	4	89	46	164	524	1	60	350	7	1,971	42.14%
% Time by Disability to Subtotal	14.81%	0.86%	0.61%	20.55%	0.20%	4.52%	2.33%	8.32%	26.59%	0.05%	3.04%	17.76%	0.36%	100.00%	

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
% Time	ID	HH	DEA	SLI	VI	ED	OI	OHI	SLD	DB	MD	AUT	TBI	Sub-Total	% Time to Total
41 to 50%	8	3	2	35	1	10	1	57	219	0	0	14	1	351	7.50%
51 to 60%	2	2	0	6	0	6	0	21	120	0	0	4	0	161	3.44%
61 to 70%	6	0	0	7	2	4	1	40	109	0	0	6	0	175	3.74%
71 to 80%	1	3	1	32	1	5	3	56	230	0	0	12	0	344	7.36%
81 to 90%	1	5	1	75	2	18	3	131	451	0	0	45	3	735	15.72%
91 to 100%	1	29	0	679	7	4	7	57	128	0	0	27	1	940	20.10%
Subtotal	11	39	2	799	12	37	14	305	1,038	0	0	94	4	2,706	57.86%
% Time by Disability to Subtotal	0.70%	1.55%	0.15%	30.82%	0.48%	1.74%	0.55%	13.38%	46.45%	0.00%	0.00%	3.99%	0.18%	100.00%	

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
% Time	ID	HH	DEA	SLI	VI	ED	OI	OHI	SLD	DB	MD	AUT	TBI	Total	% Time to Total
Total	311	59	16	1,239	17	136	61	526	1,781	1	60	458	12	4,677	100.00%
% Time by Disability to Total	6.65%	1.26%	0.34%	26.49%	0.36%	2.91%	1.30%	11.25%	38.08%	0.02%	1.28%	9.79%	0.26%	100.00%	

Figure 34 – Percent of Time Inside of Regular Class by Disability by District of Service, December 2015

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
% Time	ID	HH	DEA	SLI	VI	ED	OI	OHI	SLD	DB	MD	AUT	TBI	Total	% Time to Total
0 to 10%	89	11	13	160	3	31	21	50	57	0	42	111	0	588	12.53%
11 to 20%	115	5	1	139	3	20	11	69	202	1	17	175	3	761	16.22%
21 to 30%	41	2	1	79	1	19	6	44	195	0	1	73	1	463	9.87%
31 to 40%	48	1	0	12	1	5	3	14	61	0	3	24	0	172	3.67%
Subtotal	293	19	15	390	8	75	41	177	515	1	63	383	4	1,984	42.28%
% Time by Disability to Subtotal	14.77%	0.96%	0.76%	19.66%	0.40%	3.78%	2.07%	8.92%	25.96%	0.05%	3.18%	19.30%	0.20%	100.00%	

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
% Time	ID	HH	DEA	SLI	VI	ED	OI	OHI	SLD	DB	MD	AUT	TBI	Total	% Time to Total
41 to 50%	6	1	1	22	1	13	1	61	224	1	0	21	1	353	7.52%
51 to 60%	0	1	0	17	0	5	1	37	178	0	0	7	0	246	5.24%
61 to 70%	0	0	0	11	0	2	0	24	94	0	0	6	1	138	2.94%
71 to 80%	0	0	0	26	1	3	5	64	235	0	0	13	0	347	7.40%
81 to 90%	1	11	1	64	3	9	5	152	457	0	0	41	2	746	15.90%
91 to 100%	1	20	1	658	7	5	5	50	103	0	0	28	0	878	18.71%
Subtotal	8	33	3	798	12	37	17	388	1,291	1	0	116	4	2,708	57.72%
% Time by Disability to Subtotal	0.30%	1.22%	0.11%	29.47%	0.44%	1.37%	0.63%	14.33%	47.67%	0.04%	0.00%	4.28%	0.15%	100.00%	

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
% Time	ID	HH	DEA	SLI	VI	ED	OI	OHI	SLD	DB	MD	AUT	TBI	Total	% Time to Total
Total	301	52	18	1,188	20	112	58	565	1,806	2	63	499	8	4,692	100.00%
% Time by Disability to Total	6.42%	1.11%	0.38%	25.32%	0.43%	2.39%	1.24%	12.04%	38.49%	0.04%	1.34%	10.64%	0.17%	100.00%	

As required by the Individuals with Disabilities Education Act (IDEA) of 2004, Part B, the CDE Special Education Division (SED) has developed the State Performance Plan (SPP), which is a six-year plan covering federal FY 2013–14 through 2018–19. The **DOR**, not **DOS**, pupil count is used for the accountability at the district or county office level for identified SPP Indicators (SPPI). The CDE identifies certain local educational agencies (LEA) as significantly disproportionate based on race or ethnicity with respect to the identification of children with disabilities; the identification of children in specific disability categories; the placement of children with disabilities in particular educational settings; or the incidence, duration, and type of disciplinary actions, including suspensions and expulsions. Under IDEA requirements, if a LEA is identified as significantly disproportionate, the LEA must reserve 15 percent of its 611 and 619 IDEA grant funds to provide comprehensive CEIS to students in the LEA. These services are specifically reserved for students who do not currently receive special education services, but who need additional academic and behavioral supports to succeed in a general education environment. (Source: CDE *Significant Disproportionality Coordinated Early Intervening Services Requirements and Instructions 2016*)

The RUSD Indicator 5–Least Restrictive Environment is an annual performance report measurement used by the SED according to its SPP measurements. Indicator 5 measures the average amount of time special education pupils, between ages of 6 through 21, receive their services in settings apart from peers without disabilities. Three measurement factors for Indicator 5 are listed below.

- A. Inside of the regular class 80 percent or more of the day
Note: Indicator 5A typically refers to students served in RSP classrooms.
- B. Inside regular class less than 40 percent of the day
Note: Indicator 5B typically refers to students served in SDC classrooms.
- C. In separate schools, residential facilities, or homebound placements
Note: Indicator 5C refers to students served in nonpublic or separate schools.

The RUSD did not meet state-imposed targets for Indicator 5A and 5B. The 5C target was met in 2013-14, but not 2014-15. The LRE Annual Performance Report is outlined in **Figure 35** for 2013-14 and in **Figure 36** for 2014-15.

Figure 35 – 2013-14 Annual Performance Report for Least Restrictive Environment (Indicator 5)

A	B	C	D	E	F
Measure	Total # Pupils receiving SPED (Ages 6-22)	# Pupils in the Environment	% Pupils in the Environment receiving SPED	Target This Year	Target Met
A. >80%	4,295	1,602	37.3%	>49.2%	No
B. <40%		1,578	36.7%	<24.6%	No
C. Separate Schools		175	4.1%	< 4.4%	Yes

Figure 36 – 2014-15 Annual Performance Report for Least Restrictive Environment (Indicator 5)

A	B	C	D	E	F
Measure	Total # Pupils receiving SPED (Ages 6-22)	# Pupils in the Environment	% Pupils in the Environment receiving SPED	Target This Year	Target Met
A. >80%	4,265	1,564	36.7%	>49.2%	No
B. <40%		1,529	35.8%	<24.6%	No
C. Separate Schools		192	4.5%	< 4.4%	No

Data Source: December 2013 and 2014 CASEMIS Submission Items District of Accountability, Age, and a compiled data field consisting of unduplicated Federal School Setting and Percent in Regular Class.

Note: Separate Schools includes Students in Separate Schools, Residential Facilities and Homebound/Hospital. It does not include students in Correctional Facilities or those that are Parentally Placed in Private School.

Furthermore, RUSD did not meet its Indicator 6–Preschool Least Restrictive Environment for 2013-14 and 2014-15. Indicator 6 measures the percent of children ages 3 through 5 with IEPs attending:

- A. Regular early childhood program and receiving a majority of special education and related services in the regular program; or,
- B. Separate special education class, separate school or residential facility.

The LRE Annual Performance Report for Preschool is listed below in **Figure 37** for 2013-14 and **Figure 38** for 2014-15.

Figure 37 – 2013-14 Annual Performance Report for Preschool Least Restrictive Environment (Indicator 6)

A	B	C	D	E	F
Measure	Total # Pupils receiving SPED (Ages 3-5)	# Pupils in the Environment	% Pupils in the Environment receiving SPED	Target This Year	Target Met
A. Regular Program	485	97	20.0%	>39.8%	No
B. Separate		357	73.6%	<34.4%	No

Figure 38 – 2014-15 Annual Performance Report for Preschool Least Restrictive Environment (Indicator 6)

A	B	C	D	E	F
Measure	Total # Pupils receiving SPED (Ages 3-5)	# Pupils in the Environment	% Pupils in the Environment receiving SPED	Target This Year	Target Met
A. Regular Program	519	130	25.0%	>32.9%	No
B. Separate		367	70.7%	<34.4%	No

Data Source: December 2013 and 2014 CASEMIS Submission Items District of Accountability, Age, and Federal Preschool Setting

Type and Frequency of Services Provided

There were 35 types of services provided in 2015 by different age groups as listed in **Figure 39**.

Figure 39 – Types of Services Provided as District of Service, December 2015

A	B	C	D	E	F	G	H
Type of Service	0 – 2	3 – 5	6 – 11	12 – 21	22+	Total	% Total
1. Family Training, Counseling, Home Visits	13	0	0	0	0	13	0.15%
2. Service Coordination (0-2 only)	14	1	0	0	0	15	0.17%
3. Special Instruction (0-2 only)	2	0	0	0	0	2	0.02%
4. Specialized Academic Instruction	0	343	1,404	2,238	5	3,990	44.73%
5. Intensive Individual Services	0	45	44	26	0	115	1.29%
6. Individual and Small Group Instruction	0	2	1	0	0	3	0.03%
7. Language and Speech	0	490	1,229	536	0	2,255	25.28%
8. Adapted Physical Education	0	4	61	13	0	78	0.87%
9. Health and Nursing – Specialized Physical Health	0	0	0	1	0	1	0.01%
10. Health and Nursing – Other Services	0	0	1	1	0	1	0.01%
11. Assistive Technology Services	0	0	9	8	0	17	0.19%
12. Occupational Therapy	0	32	101	34	0	167	1.87%
13. Physical Therapy	0	16	42	15	0	73	0.82%
14. Individual Counseling	0	0	22	47	0	69	0.77%
15. Counseling and Guidance	0	1	35	66	0	102	1.14%
16. Social Work Services	0	0	0	6	0	6	0.07%
17. Psychological Services	0	0	3	8	0	11	0.12%
18. Behavior Intervention Services	0	1	34	16	0	51	0.57%
19. Specialized Services for Low Incidence Disabilities	1	0	3	2	0	6	0.07%
20. Specialized Deaf and Hard of Hearing Services	7	3	24	40	1	75	0.84%
21. Interpreter Services	0	0	3	3	0	6	0.07%
22. Audiological Services	0	0	0	2	0	2	0.02%
23. Specialized Vision Services	0	3	13	24	0	40	0.45%
24. Orientation and Mobility	0	1	5	11	0	17	0.19%
25. Braille Transcription	0	0	1	0	0	1	0.01%
26. Specialized Orthopedic Services	0	1	0	0	0	1	0.01%
27. College Awareness/Preparation	0	0	0	230	1	231	2.59%
28. Voc/Career Assessment Counseling and Guidance	0	0	0	582	5	587	6.58%
29. Career Awareness	0	0	0	865	4	869	9.74%
30. Work Experience Education	0	0	0	15	0	15	0.17%
31. Job Coaching	0	0	0	0	0	0	0.00%
32. Mentoring	0	0	0	0	0	0	0.00%
33. Agency Linkages (Referral and Placement)	0	0	0	2	0	2	0.02%
34. Travel Training (includes mobility training)	0	0	0	25	3	28	0.31%
35. Other Transition Services	0	0	0	69	2	71	0.80%
Total	37	943	3,034	4,885	21	8,920	100.00%

In **Figure 40**, a summary of the services provided in December 2015 was compared to services provided in December 2014. “Job Coaching” and “Mentoring” were provided in 2014, but not in 2015. The difference in the number of services provided from one year to the next is displayed in Column F. Specific cluster of services provided will be addressed further in this report.

Figure 40 – Comparison of Types Services Provided as District of Service, December 2014 and 2015

A	B	C	D	E	F
Type of Service Provided	December 2014		December 2015		Difference
	Total Services	% Total Services	Total Services	% Total Services	Col. D minus Col. C
1. Family Training, Counseling, Home Visits (0-2 only)	6	0.07%	13	0.15%	7
2. Service Coordination (0-2 only)	11	0.13%	15	0.17%	4
3. Special Instruction (0-2 only)	2	0.02%	2	0.02%	0
4. Specialized Academic Instruction	3,946	45.35%	3,990	44.73%	44
5. Intensive Individual Services	80	0.92%	115	1.29%	35
6. Individual and Small Group Instruction	3	0.03%	3	0.03%	0
7. Language and Speech	2,212	25.42%	2,255	25.28%	43
8. Adapted Physical Education	73	0.84%	78	0.87%	5
9. Health and Nursing – Specialized Physical Health	4	0.05%	1	0.01%	(3)
10. Health and Nursing – Other Services	4	0.05%	1	0.01%	(3)
11. Assistive Technology Services	13	0.15%	17	0.19%	4
12. Occupational Therapy	177	2.03%	167	1.87%	(10)
13. Physical Therapy	68	0.78%	73	0.82%	5
14. Individual Counseling	59	0.68%	69	0.77%	10
15. Counseling and Guidance	111	1.28%	102	1.14%	(9)
16. Social Work Services	3	0.03%	6	0.07%	3
17. Psychological Services	6	0.07%	11	0.12%	5
18. Behavior Intervention Services	39	0.45%	51	0.57%	12
19. Specialized Services for Low Incidence Disabilities	3	0.03%	6	0.07%	3
20. Specialized Deaf and Hard of Hearing Services	92	1.06%	75	0.84%	(17)
21. Interpreter Services	6	0.07%	6	0.07%	0
22. Audiological Services	3	0.03%	2	0.02%	(1)
23. Specialized Vision Services	45	0.52%	40	0.45%	(5)
24. Orientation and Mobility	18	0.21%	17	0.19%	(1)
25. Braille Transcription	0	0.00%	1	0.01%	1
26. Specialized Orthopedic Services	0	0.00%	1	0.01%	1
27. Transcription Services	1	0.01%	0	0.00%	(1)
28. College Awareness/Preparation	122	1.40%	231	2.59%	109
29. Voc/Career Assessment Counseling and Guidance	573	6.58%	587	6.58%	14
30. Career Awareness	918	10.55%	869	9.74%	(49)
31. Work Experience Education	15	0.17%	15	0.17%	0
32. Job Coaching	16	0.18%	0	0.00%	(16)

33. Mentoring	12	0.14%	0	0.00%	(12)
34. Agency Linkages (Referral and Placement)	3	0.03%	2	0.02%	(1)
35. Travel Training (includes mobility training)	10	0.11%	28	0.31%	18
36. Other Transition Services	48	0.55%	71	0.80%	23
Total	8,702	100.0%	8,920	100.0%	218

As shown in **Figure 41**, the most frequent types of services provided was reported in the areas of “Specialized Academic Instruction,” “Language and Speech,” and “Career Awareness.” This information is outlined by services provided by age levels.

The definition of **Specialized Academic Instruction** is:

“Adapting, as appropriate, to the needs of the child with a disability the content, methodology, or delivery of instruction to ensure access of the child to the general curriculum, so that he or she can meet the educational standards within the jurisdiction of the public agency that apply to all children. (34 *CFR* 300.39(b)(3))”

The definition of **Language and Speech** is:

“Language and speech services provide remedial intervention for eligible individuals with difficulty understanding or using spoken language. The difficulty may result from problems with articulation (excluding abnormal swallowing patterns, if that is the sole assessed disability); abnormal voice quality, pitch, or loudness; fluency; hearing loss; or the acquisition, comprehension, or expression of spoken language. Language deficits or speech patterns resulting from unfamiliarity with the English language and from environmental, economic, or cultural factors are not included.”

“Services include: specialized instruction and services, monitoring, reviewing, and consultation. Services may be direct or indirect including the use of a speech consultant.”

Reference: *California Special Education Management Information System Technical Assistance Guide* (2015-16 Draft).

The **Career Awareness** category will be further addressed under **Figure 45**.

Figure 41 – Most Frequent Types of Services Provided by Age Level, December 2014 and 2015

Service (Code)	0-2		3-5		6-11		12-21		22+		Total	
A	B	C	D	E	F	G	H	I	J	K	L	M
	2014	2015	2014	2015	2014	2015	2014	2015	2014	2015	2014	2015
Specialized Academic Instruction (330)	0	0	320	343	1,361	1,404	2,261	2,238	4	5	3,946	3,990
Language and Speech (415)	1	0	427	490	1,249	1,229	535	536	0	0	2,212	2,255
Career Awareness (840)	0	0	0	0	0	0	916	865	2	4	918	869

The most frequent types of services provided referenced in **Figure 41** above were disaggregated by disability category in **Figure 42**.

Regarding “Language and Speech,” 2,212 pupils received these services as of December 2014, increasing to 2,255 in December 2015. This would include those services provided to pupils with a primary SLI disability as well as pupils identified with different disabilities as shown in **Figure 42**. With 1,193 reported as primary SLI pupils receiving speech therapy in December 2014, the difference is 928 (2,212 minus 1,193) or 46.16 percent of the pupils who received speech therapy as a related service. Decreasing to 1,162 reported as primary SLI pupils in December 2015, 1,093 (2,255 minus 1,162) or 48.47 percent who received speech therapy as a related service.

Figure 42 – Most Frequent Types of Services Provided by Disability, December 2014 and 2015

	Specialized Academic Instruction		Language and Speech		Career Awareness	
	Dec 2014	Dec 2015	Dec 2014	Dec 2015	Dec 2014	Dec 2015
A	B	C	D	E	F	G
ID	311	305	138	133	59	67
HH	28	30	21	22	7	7
DEAF	9	5	7	4	3	4
SLI	569	522	1,193	1,162	37	38
VI	10	13	3	4	3	4
ED	137	116	17	18	55	42
OI	59	56	16	22	10	12
OHI	521	565	101	113	144	136
SLD	1,778	1,810	336	349	532	475
DB	1	2	0	0	0	1
MD	60	62	25	30	5	9
AUT	451	496	352	394	58	71
TBI	12	8	3	4	5	3
Total	3,946	3,990	2,212	2,255	918	869

The 500 Code service categories are outlined in **Figure 43** as of December 2014 and December 2015. The RUSD provided 218 behavioral, counseling, and psychological services as of December 1, 2014 and 239 as of December 1, 2015.

See **Figure 45** for a description of the 500 service codes.

Figure 43 – Behavioral, Counseling and Psychological Services, December 2014 and 2015

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
	December 2014							December 2015						
Service (Code)	0-2	3-5	6-11	12-21	22+	Total	%	0-2	3-5	6-11	12-21	22+	Total	%
Individual Counseling (510)	0	0	15	44	0	59	0.68%	0	0	22	47	0	69	0.77%
Counseling & Guidance (515)	0	0	33	78	0	111	1.28%	0	1	35	66	0	102	1.14%
Social Work Services (525)	0	0	0	3	0	3	0.03%	0	0	0	6	0	6	0.07%
Psych Services (530)	0	1	2	3	0	6	0.07%	0	0	3	8	0	11	0.12%
Behavior Intervention Services (535)	0	1	29	9	0	39	0.45%	0	1	34	16	0	51	0.57%
Total (500)	0	2	79	137	0	218	2.51%	0	2	94	143	0	239	2.67%

As shown in **Figure 44**, RUSD provided 108 behavioral, counseling, and psychological services were provided for pupils with ED in 2014 and 80 in 2015. This represents a decrease of 28 services.

The following observations are presented below.

- The total number of pupils with ED as of December 2014 was reported at 136 and 112 as of 2015 (see **Figure 25**).
- In December 2014, if each ED pupil was provided only one service under the 500 Code, then 28 ED pupils would receive no services under 500 Code categories.
- In December 2015, 32 ED pupils would receive no 500 Code services.

As cited earlier, there is a significant “Total Ending Fund Balance” of \$10,327,462.12 in FY 2015-16 in Resource Code 6512 – Special Education Mental Health Services (see **Figure 4**). In researching this further, the District Special Education Department indicated that some nonpublic schools have bundled their daily that might include the basic educational program along with counseling and guidance and other related Mental Health educationally based services. As such, these related services might not appear in the student’s IEP.

The RUSD has built capacity of qualified employees to provide Mental Health services within the District. As such, the District may want to consider providing these related services to its NPS pupils and/or insuring that the 500 Code categories provided by NPSs are included on the IEPs. If the District provides the Mental Health services instead of the NPS, then RUSD may want to consider negotiating a lower NPS daily rate.

Figure 44 – Behavioral, Counseling and Psychological Services for Emotional Disturbance Category, December 2014 and 2015

A	B	C	D
	December 2014	December 2015	Difference from
Service (Code)	Emotional Disturbance	Emotional Disturbance	2014 to 2015
Individual Counseling (510)	40	31	(9)
Counseling & Guidance (515)	62	42	(20)
Social Work Services (525)	1	2	1
Psychological Services (530)	3	3	0
Behavior Intervention Services (535)	2	2	0
Total (500)	108	80	(28)

As a reference, the “500 Code Categories for Mental Health Services” have been provided in **Figure 45**. These were reprinted from the *California Special Education Management Information System Technical Assistance Guide* (2015-16 Draft).

Figure 45 – 500 Code Categories Related to Mental Health Services

Code	Service Categories
510	Individual Counseling: One-to-one counseling, provided by a qualified individual pursuant to an IEP. Counseling may focus on aspects, such as educational, career, personal; or be with parents or staff members on learning problems or guidance programs for students. Individual counseling is expected to supplement the regular guidance and counseling program. (34 CFR § 300.24(b)(2), (CCR Title 5 §3051.9).
515	Counseling and guidance: Counseling in a group setting, provided by a qualified individual pursuant to an IEP. Group counseling is typically social skills development, but may focus on aspects, such as educational, career, personal; or be with parents or staff members on learning problems or guidance programs for students. IEP-required group counseling is expected to supplement the regular guidance and counseling program. (34 CFR §300.24.(b)(2)); CCR Title 5 §3051.9) Guidance services include interpersonal, intrapersonal or family interventions, performed in an individual or group setting by a qualified individual pursuant to an IEP. Specific programs include social skills development, self-esteem building, parent training, and assistance to special education students supervised by staff credentialed to serve special education students. These services are expected to supplement the regular guidance and counseling program. (34 CFR 300.306; CCR Title 5 §3051.9).
520	Parent Counseling: Individual or group counseling provided by a qualified individual pursuant to an IEP to assist the parent(s) of special education students in better understanding and meeting their child's needs; may include parenting skills or other pertinent issues. IEP-required parent counseling is expected to supplement the regular guidance and counseling program. (34 CFR §300.31(b)(7); CCR Title 5 §3051.11).

525	Social Work Services: Social Work services, provided pursuant to an IEP by a qualified individual, includes, but are not limited to, preparing a social or developmental history of a child with a disability; group and individual counseling with the child and family; working with those problems in a child's living situation (home, school, and community) that affect the child's adjustment in school; and mobilizing school and community resources to enable the child to learn as effectively as possible in his or her educational program. Social work services are expected to supplement the regular guidance and counseling program. (34 CFR §300.24(b)(13); CCR Title 5 §3051.13).
530	Psychological Services: These services, provided by a credentialed or licensed psychologist pursuant to an IEP, include interpreting assessment results to parents and staff in implementing the IEP; obtaining and interpreting information about child behavior and conditions related to learning; planning programs of individual and group counseling and guidance services for children and parents. These services may include consulting with other staff in planning school programs to meet the special needs of children as indicated in the IEP. (CFR Part 300 §300.24). IEP-required psychological services are expected to supplement the regular guidance and counseling program. (34 CFR §300.24; CCR Title 5 §3051.10).
535	Behavior Intervention Services: A systematic implementation of procedures designed to promote lasting, positive changes in the student's behavior resulting in greater access to a variety of community settings, social contacts, public events, and placement in the least restrictive environment. (CCR Title 5 §3001(d)).
540	Day Treatment Services: Structured education, training and support services to address the student's mental health needs (<i>Health & Safety Code</i> , Div.2, Chap.3, Article 1, 1502(a)(3)).
545	Residential Treatment Services: A 24-hour out-of-home placement that provides intensive therapeutic services to support the educational program (<i>Welfare and Institutions Code</i> , Part 2, Chapter 2.5, Art. 1, §5671)).

Source: <http://www.cde.ca.gov/sp/se/ds/casemis.asp>.

Note: It was reported that all students were transitioned out of Service Code 540, “Day Treatment Services” and Service Code 545 “Residential Treatment Services.”

The 800 Code service categories related to career/college awareness, job readiness, and transition services were aggregated in **Figure 46** for December 2014 and 2015. As some services were provided in 2014 and not provided in 2015 (or vice versa) – this may warrant why those services are no longer provided. The students may have graduated.

Another question would involve why some the provision of some services increased or decreased significantly from 2014 to 2015. For example, “College Awareness Preparation” comprised of 122 services provided in 2014, with 231 provided in 2015.

Figure 46 – Career, Vocational and Transition Services, December 2014 and 2015

Service (Code)	December 2014				December 2015			
	12-21	22+	Total	%	12-21	22+	Total	%
A	B	C	D	E	F	G	H	I
College Awareness Preparation (820)	122	0	122	1.40%	230	1	231	2.59%
Vocational Assessment, Counseling, Guidance, and Career Assessment (830)	569	4	573	6.58%	582	5	587	6.58%
Career Awareness (840)	916	2	918	10.55%	865	4	869	9.74%
Work Experience Education (850)	15	0	15	0.17%	15	0	15	0.17%
Job Coaching (855)	14	2	16	0.18%	0	0	0	0.00%
Mentoring (860)	10	2	12	0.14%	0	0	0	0.00%
Agency Linkages (referral and placement) (865)	2	1	3	0.3%	2	0	2	0.02%
Travel Training (includes mobility training) (870)	10	0	10	0.11%	25	3	28	0.31%
Other Transition Services (890)	47	1	48	0.55%	69	2	71	0.80%
Total (800)	1,705	12	1,717	19.71%	1,788	15	1,803	20.21%

PHASE TWO: FINDINGS

- There are significant differences in the District of Residence (DOR) pupil count reported by RUSD as compared to the District of Service (DOS) pupil count. Although RUSD assumes all financial and educational responsibility, these pupils are reported as DOS only. There are no contracts or inter-SELPA permits that allow RUSD to determine excess costs for IEP-required programs and services rendered to these pupils.
- In comparing the percent of enrollment by disability for December 2012 through 2015, categories showing growth included: Other Health Impairment (OHI); Specific Learning Disability (SLD); and, Autism. On the contrary, Speech or Language Impairment (SLI), Emotional Disturbance (ED), and Orthopedic Impairment (OI) showed a decline.
- Regarding pupils with ED, a decrease was reported from 182 pupils in 2012 to 112 in 2015. It appears that some pupils are receiving limited or no 500 Code services related to counseling, guidance, psychological, social work, and/or behavior intervention.
- Some nonpublic schools (NPS) have bundled their daily rate that might include the basic educational program along with counseling and guidance and other related Mental Health educationally based services. As such, these related services might not appear on the pupils' individualized education program (IEP).

- As of December 2011 through 2015, RUSD reported a lower percentage of disability categories than statewide averages in: Hard of Hearing (HH); Deaf; Visual Impairment (VI); ED; OI; SLD; and, Autism. On the contrary, RUSD had a higher percentage in: Intellectual Disability (ID); SLI; OHI; and, Multiple Disability (MD).
- Although the number of SLI pupils has decreased, the District's percentage is higher than statewide averages. Also, approximately 46-48 percent of the speech therapy was provided as a related service in December 2014 and 2015 to pupils with other disabilities than speech impairment.
- The number of pupils reported as "Other/Ungraded" increased from 52 in 2011 to 130 in 2015.

PHASE TWO: RECOMMENDATIONS

- When RUSD assumes all financial, programmatic, and accountability responsibilities for pupils residing in other school districts, it should report these pupils as both District of Residence (DOR) and District of Service (DOS). This would allow RUSD to receive additional funding tied to special education pupil count (e.g., low incidence funding based on specific eligibility). Note: DOR pupil count is used for accountability at the District level for identified State Performance Plan Indicators (SPPI).
- As RUSD did not meet some of its SPPI for least restrictive environment (LRE) for preschool and K-12, revisit the process used by IEP teams when reporting the percent of time in general education settings.
- Review the 500 Code service categories related to Mental Health services provided to pupils with emotional disturbance and other pupils requiring educationally based Mental Health services. The development of a Mental Health Master Plan is addressed in Phase Three: Program Delivery Analysis.
- As RUSD has built capacity of qualified employees who can provide Mental Health services, the District may want to consider providing these related services to its NPS pupils and/or ensuring that the 500 Code categories provided by NPSs are included on the IEPs. If RUSD provides those services instead of the NPS, then RUSD may want to consider negotiating a lower NPS daily rate that includes the bundling of services.
- Review the 800 Code services related to career/college awareness, job readiness, and transition services for December 2014 and 2015, as some were provided in 2014 but not in 2015 (or vice versa), or services increased or decreased significantly.
- As an OI primary or secondary disability generates low incidence funding (while MD does not generate funds), it is important to share this information with the IEP team.
- Research why the "Other/Ungraded" pupil count increased from 52 in 2011 to 130 in 2015. Assign all pupils to a specific grade level in the next reporting cycle.

PHASE THREE: PROGRAM DELIVERY ANALYSIS

PREFACE

A review of special education program operations including current staffing levels and patterns was conducted to determine if the District could decrease and/or increase staff, and/or make any staffing changes to include, but not limited to: special education teachers; related service providers (e.g., speech and language pathologists, adapted physical education teachers, occupational therapists; physical therapists, behaviorists, nurses); pupil personnel (e.g., psychologists, counselors); other contracts service providers; and, paraprofessionals.

An analysis of the District's current special education program delivery systems was conducted to determine if they are appropriate as structured or if opportunities exist for enhancing program delivery in the least restrictive environment (LRE), in which to the maximum extent possible, students with disabilities are educated with other students in the regular educational environment. This review addressed the percentage of students receiving services in regular classes, separate special education programs, and separate schools or facilities.

This evaluation included a comprehensive review of District-operated special education programs and services. In looking at a system of operations and instructional settings, special education as a service under a Multi-Tiered System of Supports (MTSS) and Response to Intervention (RtI), was addressed.

The TSS Consultants conducted three days of on-site meetings and interviews with key groups of stakeholders. A parent forum was held in the evening to facilitate optimum participation. Follow-up emails for continued information gathering as well as and phone conferences were held with stakeholders who were not available during the site interviews. Furthermore, a *Special Education Parent Survey* (in English and Spanish) was mailed to the home address of every special education student enrolled in the RUSD with a stamped return envelope to the address of Total School Solutions Office in Fairfield California.

Findings are summarized and recommendations are presented at the end of this section, while still adhering to special education legal mandates and required level of services. As part of this discussion, identified compliance and due process themes within the District were included when presenting these recommendations and/or strategies.

STAFFING LEVELS AND PATTERNS

INTRODUCTION

A review of staffing levels and patterns was conducted to determine if the District could decrease and/or increase staff, and/or make any staffing changes. The personnel categories addressed in this section are listed below.

- Special Education Teachers
- Instructional Assistants
- Psychologists
- Adapted Physical Education Teachers
- Speech and Pathologists and Assistants
- Occupational Therapists
- Itinerant Teachers for Visually Impairment
- Nurses
- Program Specialists

SPECIAL EDUCATION PERSONNEL DATA INFORMATION

A comparison from 2014-15 to 2015-16 was made of special education certificated and classified to identify trends in personnel. Shown in **Figure 47a** is a comparison of the California Department of Education (CDE) "Form R-30 SE" for school years 2014-15 and 2015-16. This information is based on December 1 reporting date.

Figure 47a Special Education Personnel Data Information for 2014-15 and 2015-16–Sections A & B

SECTION A – Number of Special Education Instructors/Teachers Who Teach Core Academic Subjects						
Personnel Category	(A) Highly Qualified (District and Contracted Staff)		(B) Not Highly Qualified (District and Contracted Staff)		(C) District Vacant Positions Filled by Contracted Staff	
A	B	C	D	E	F	G
	2014-15	2015-16	2014-15	2015-16	2014-15	2015-16
Resource Specialist (K-22)	59.00	70.60	0.00	6.00	0.00	0.00
Special Day Class Teacher (K-22)	113.00	180.80	0.00	27.00	0.00	0.00
Other Certificated Instructor/Teacher (K-22)*	1.00	1.00	0.00	0.00	0.00	0.00
Subtotal	172.00	252.40	0.00	33	0.00	0.00
SECTION B – Infant/Preschool Programs, Paraprofessionals, and Special Education Instructors/Teachers Who Do NOT Teach Core Academic Subjects						
	2014-15	2015-16	2014-15	2015-16	2014-15	2015-16
Infant Program (Ages 0-2)	0.50	0.75	0.00	0.00	0.00	0.00
Preschool Program (Ages 3-5)	19.00	18.80	0.00	0.00	0.00	0.00
Paraprofessionals for ages 3-5	41.00	43.00	0.00	0.00	0.00	0.00
Paraprofessionals for ages 6-22	398.00	431.00	0.00	0.00	15.00	0.00
Resource Specialist (K-22)	1.00	0.00	0.00	0.00	0.00	0.00
Special Day Class Instructor/Teacher (K-22)	48.00	0.00	0.00	0.00	0.00	0.00
Subtotal	507.50	477.55	0.00	0.00	15.00	0.00

Section C from “Form R-30 SE” for 2014-15 and 2015-16 is shown in **Figure 47b**.

Figure 47b Special Education Personnel Data Information for 2014-15 and 2015-16 – Section C

SECTION C – Other Special Education Personnel (Preschool – Age 22)						
Personnel Category	(A) Certified		(B) Not Fully Certified		(C) District Vacant Positions Filled by Contracted Staff	
	2014-15	2015-16	2014-15	2015-16	2014-15	2015-16
Adapted PE Specialist	4.00	4.00	0.00	0.00	0.00	0.00
Deaf/Hard of Hearing Specialist	2.00	2.00	0.00	0.00	0.00	0.00
Interpreters	1.50	5.75	0.00	0.00	0.00	0.00
Medical/Nursing Service Staff	9.00	9.00	0.00	0.00	0.00	0.00
Non-Professional Staff	12.00	0.00	0.00	0.00	0.00	0.00
Occupational Therapist	2.50	3.50	0.00	0.00	0.50*	0.50*
Orientation and Mobility Specialist	1.00	1.00	0.00	0.00	0.00	0.00
Other Professional Staff	5.00	16.70	0.00	0.00	1.00	1.00
Physical Therapist	0.00	0.00	0.00	0.00	1.00	1.00
Psychologist	24.99	25.70	0.00	0.00	1.00	0.00
Speech Pathologist	39.00	47.00	0.00	0.00	3.00	3.00
Supervisor/Administrator	9.00	10.00	0.00	0.00	0.00	0.00
Vision Specialist	2.00	2.00	0.00	0.00	0.00	0.00
Vocational Education Specialist	2.00	2.00	0.00	0.00	0.00	0.00
Subtotal	113.99	128.65	0.00	0.00	6.50	5.50

* Occupational Therapist is a District Vacant Position but NOT filled by Contracted Staff.

Notable increases/decreases in full time equivalent (FTE) staffing from 2014-15 to 2015-16, as shown in **Figure 47b**, are highlighted below.

<u>SECTION C</u>	<u>2014-15</u>	<u>2015-16</u>	<u>Increase</u>
Interpreters	1.50	5.75	4.25
Occupational Therapist	2.50	3.50	1.00
Non-Professional Staff	12.00	0.00	(12.00)
Other Professional Staff	5.00	16.70	11.70
Psychologists	24.99	25.70	0.71
Speech Pathologists	39.00	47.00	8.00

It was reported by the District that although the positions in personnel categories of “Non-Professional” and “Other Professional” staff were coded differently from one year to the next, there are no significant increases or decreases in these positions. These categories include positions such as program specialists and other support special education staff. As the Special Education/SELPA Director now completes this report, it has been rectified and will be consistent for future reporting periods.

SPECIAL EDUCATION TEACHERS

There were notable increases in full time equivalent (FTE) special education teachers from 2014-15 to 2015-16 as shown in **Figure 47a**. These are highlighted below.

<u>SECTIONS A and B</u>	<u>2014-15</u>	<u>2015-16</u>	<u>Increase</u>
Resource Specialist (Section A)	59.00	70.60	
Resource Specialist (Section B)	1.00		
Resource Specialist Total	60.00		10.60
Special Day Class Teacher (Section A)	113.00	180.80	
Special Day Class Teacher (Section B)	48.00		
Special Day Class Teacher Total	161.00		19.80

It was reported by the District that the increases in teachers and instructional assistants (paraprofessionals) were mostly a result of adding classes pursuant to the special education class size language in the Agreement for Certificated Bargaining Unit. That language is reprinted below. Also, one new Transitional Kindergarten (TK) class and two new preschool classes were opened during this time frame.

ARTICLE XII – CLASS SIZE

Section 5 - Special Education

B. The District will examine individual caseloads to determine what additional staff support or other assistance is needed should site averages exceed these maximums:

6. Elementary Special Day Class: 13
7. Middle School Special Day Class and High School Severely Handicapped Class: 15
8. Elementary and Middle School Resource Specialist: 28 (32 with waiver)
9. High School RSP and Non SH Special Day Classes: 25

Staff from the Special Education and Personnel Departments meet on a regular basis as needed to review the staffing counts at elementary and secondary grade levels for: (a) Resource Specialist Program (RSP); (b) Special Day Classes (SDC) for Mild to Moderate (M/M); and, (c) Moderate to Severe (M/S). Worksheets were created to monitor class sizes at each schools site and to allocate additional certificated and classified staff as appropriate. Provided below is the formula used throughout this process for students with mild to moderate disabilities.

<u>RSP and SDC</u>	<u>Staffed At</u>	<u>Maximum</u>
Elementary School	26:1	28:1
Middle School	26:1	28:1
High School	23:1	25:1

INSTRUCTIONAL ASSISTANTS

Special education instructional assistants are allocated at five hours for every special education teacher full time equivalency. At the elementary level, assistants are typically assigned to each special education teacher. Principals at middle and high school levels assign their allocated aide time based on the identified needs of special education students and programs at their school site. Also, there are some six-hour assistants allocations based on student needs.

Distinguishing characteristics are reprinted below from the RUSD job description of the instructional assistant position, which is posted on the Personnel website.

DISTINGUISHING CHARACTERISTICS: Incumbents in the Instructional Assistant-Special Education I class are assigned to assist and work with learning handicapped, Special Day Class (SDC), Resource Specialist Program (RSP), Infant Preschool Program, Preschool Intervention Program (PIP), or other students as assigned. Incumbents assigned to the Instructional Assistant-Special Education II class work with severely, physically, visually or other handicapped students as assigned. Incumbents perform more physical and medical treatment activities in the performance of daily activities.

There were notable increases in FTE paraprofessionals from 2014-15 to 2015-16 as shown in **Figure 47a**. These are highlighted below.

<u>SECTION B</u>	<u>2014-15</u>	<u>2015-16</u>	<u>Increase</u>
Paraprofessionals for ages 3-5	41.00	43.00	2.00
Paraprofessionals for ages 6-22	398.00	431.00	33.00

Again the increase in instructional assistants (paraprofessionals) was a result of adding classes pursuant to the special education class size language in the Certificated Bargaining Unit Agreement cited earlier. Also, it was reported that Intensive Behavior Interventions Assistants were added. Furthermore, the number of paraprofessionals may have been increased due students entering the District with instructional assistants included on their IEPs.

The District developed a guide when determining the need for special circumstance instructional assistants. The guide and training have been provided to principals and other District and school site administrators. Upon suggestion of the TSS Consultant, the District has ordered the *Special Circumstance Independence Assessment (SCIA)* recently revised by a consortium of districts from the North Inland SELPA. The SCIA manual provides guidelines for incorporating Special Circumstance support into the student's IEP and Behavior Intervention Plan, if needed.

The Special Education Department and Human Resources work closely to allocate aide hours based on a formula and language referenced above from Agreement for Certificated Bargaining Unit. However, it appears that there is no system in place to evaluate the need of adding or reducing paraprofessional positions or hours. There is no central daily oversight of position control monitoring. As a new need arises for additional assistance, redeployment of existing available personnel without full assignments may not occur.

PSYCHOLOGISTS

With the District K-12 enrollment of 42,462 in 2015-16 and 25.70 FTE psychologists, shown in **Figure 47b**, the average ratio of school psychologist to students was 1,652. For the 2016-17 school year, 5.00 FTE school psychologists were added. Based on 30.70 FTE psychologists, this recalculated average ratio of school psychologist to students is approximately 1,383.

As of 2014-15 (Source: DataQuest "Pupil Services Staff by Type" Report), there were a total of 5,257 school psychologists statewide – with a ratio of one school psychologist to 1,186 K-12 students based on a total statewide enrollment of 6,235,520.

Note: This information is no longer accessible from DataQuest. Also, the reporting of psychologists could be inconsistent statewide as some districts included behaviorist-type positions with their FTE count for psychologists.

Comparative information from the National Association of School Psychologists (NASP) included California's ratio of one school psychologist to 1,773 students in 2004-05 and 1,579 students in 2009-10 (Source: *Ratio of Students per School Psychologist by State* prepared by Jeffrey Charvat, Ph.D.).

It appears that the number of school psychologists is appropriate and there are no recommendations at this time. Recommendations regarding psychological services have been provided further in this report.

ADAPTED PHYSICAL EDUCATION TEACHERS

There are currently 4.00 FTE Adapted Physical Education (APE) teachers, with the following assignments based by grade level:

- (a) One teacher serving high schools only;
- (b) One teacher serving middle schools and one high school; and,
- (c) Two teachers serving preschool, elementary, and one high school each.

The APE teachers also coordinate "Special Athletics" for the District involving five different events of the year.

The APE caseloads range from 7 to 20 pupils with an average of 20 pupils per teacher. The average caseload is low, but the following factors need to be taken into account:

- Individual versus group or class instruction;
- Direct teaching time versus non-teaching duties;
- Intense needs of specific students;
- Split or itinerant assignments; and/or,
- Travel time, especially if larger geographical areas are involved.

It appears that the number of APE teachers is appropriate and their distribution of workload is equitable based on individual needs of students, number of school sites, and class instruction.

SPEECH AND LANGUAGE PATHOLOGISTS AND ASSISTANTS

As shown in Figure 47b, there was an increase of 8.00 speech and language pathologists (SLP) from 39.00 in 2014-15 to 47.00 in 2015-16. For the 2016-17 school year, 1.00 Assistive Technology SLP and 1.00 Preschool SLP was added.

Currently there are 47.10 FTE SLPs, of which, 8.00 FTE therapists are assigned to preschool aged pupils. There are nine Speech and Language Pathology Assistants (SLPA) who work a six-hour day. One SLPA is paid for by LEA Medi-Cal funds.

Pursuant to CA EC § 56363.3,

“The average caseload for language, speech, and hearing specialists in special education local plan areas shall not exceed 55 cases . . .”

Pursuant to CA EC § 56441.7(a),

“The maximum caseload for a speech and language specialist providing services exclusively to individuals with exceptional needs, between the ages of three and five years . . . shall not exceed a count of 40.”

Pursuant to Title 5 Regulations, § 3051.1, Language, Speech and Hearing Development and Remediation,

“b) Caseloads of full-time equivalent language, speech and hearing specialists providing instruction and services within the district, SELPA, or county office shall not exceed a district-wide, SELPA-wide, or county-wide average of 55 individuals unless prior written approval has been granted by the SSPI.” (State Superintendent of Public Instruction)

“(d) Services may also be provided by speech-language pathology assistants working under the direct supervision of a qualified language, speech, and hearing specialist, as defined in Business and Professions Code section 2530.2(i), and if specified in the IEP. No more than two assistants may be supervised by one qualified language, speech, and hearing specialist. The caseloads of persons in subdivision (b) shall not be increased by the use of assistants.”

The District Lead SLP developed a worksheet to monthly monitor the caseloads of each SLP by school site as well as assign the SLPAs. A worksheet was also prepared that tracks the caseloads across the school year as the number of preschool pupils requiring speech services always starts low and grows throughout the school year as the Early Childhood Assessment Team (ECAT) assessments are completed.

Based on the number of pupils receiving speech services as of September 22, 2016, the average SLP caseload for preschool was 24.00 pupils and 51.35 pupils for K-12. It was reported that the preschool caseloads were lower due to several reasons: (a) additional duties, such as Early ECAT assessments, bilingual assessments; and, (b) growth patterns at the preschool level as referenced above.

It appears that the number of SLPs is appropriate and their distribution of workload is equitable based on the frequency/level of services required by disability and age level. Recommendations regarding language and speech services have been provided further in this report.

OCCUPATIONAL THERAPISTS

There are currently 4.0 FTE Occupational Therapists Registered (OTR), with several nonpublic agencies (NPA) providing occupational therapy services. The District has posted and advertised to recruit additional OTRs for the past three years, but there is a statewide shortage and it is extremely difficult to fill these positions. The OT salary range is 48, which appears to be

competitive with NPA vendors. The District also employs 1.50 FTE Certified Occupational Therapy Assistant (COTA).

It was suggested by a District-employed OTR that RUSD reclassify its OTR positions from a certified to a certificated position. However, OTRs have licensure requirements in this state through the California Board of Occupational Therapy. The OTRs typically do not hold a credential to be eligible for a certificated status. Some districts have been able to recruit OTRs through Classified Management positions.

ITINERANT TEACHERS FOR VISUALLY IMPAIRMENT PROGRAM

There are 2.00 FTE teachers who serve pupils with visual impairments (VI). The VI itinerant teachers travel to multiple sites, and it was reported that every school is very accommodating and the VI teachers feel welcomed. The flow of information is very good and VI teachers are included in pertinent loops of information.

Although, the VI students have full access to technology and are provided assistive equipment and materials pursuant to their IEPs, it was shared that statewide and district-level testing present challenges for this population.

NURSES

As shown in **Figure 47b**, there were 9.00 FTE medical/nursing personnel in 2014-15 and 2015-16. There are also 9.00 FTE nursing personnel in 2016-17, of which, 2.40 FTE Registered Nurses (RN) and a 3-hour Licensed Vocational Nurse (LVN) are paid out of LEA Medi-Cal reimbursement. The RNs oversee health assistants at each school site. One full-time LVN and one full-time RN are assigned to students with severe disabilities. The RNs train the one-on-one instructional assistants who are assigned to students with medical needs.

“Guidelines for Parentally Provided Healthcare Providers” are currently in development by Riverside and Moreno Valley Unified School Districts. They are collaborating to create expectation of duties/roles, student confidentiality, and responsibilities of these health care providers in the school classroom and educational setting.

During the stakeholder input sessions, several program managers and nurses suggested increasing nursing hours at the preschool level. Nursing staff asked that the District consider assigning a full-time nurse to the Sunshine Preschool Program. Suggested job duties by nursing staff were presented and are summarized below.

- Review health histories and provide information during the evaluation process.
- Attend IEP meetings as appropriate, including transition meetings.
- Administer hearing and vision screenings to pupils transitioning to kindergarten, if not perform within a year of the transition.
- Create health plans/memos for incoming and existing pupils with new health issues.
- Train staff on medical care (including Specialized Healthcare Procedures) of incoming and existing pupil new health issues (including extended school year).

- Follow up on classroom concerns that require nursing assessment.
- Communicate with physicians regarding student health care needs at school.

Nursing Services at the Preschool Level

The Early Childhood Assessment Team (ECAT) is comprised of psychologists, speech pathologists, as well as a nurse, occupational therapist, or other related service provider(s) as needed. The ECAT conducts evaluations for determination of eligibility for special education services at the preschool level. The evaluation reports are presented at a full IEP meeting.

It was reported that during the school year 2015-16, approximately 200 ECATs assessments were conducted at the Sunshine Preschool Program. The assigned school nurse receives the health services request forms from the ECAT. Due to the significant number of pupils going through this assessment process and the intensive time commitment involved, it was reported that the hearing and vision screenings are conducted only on those pupils who are found eligible for special education. It was reported that students transitioning to kindergarten are tested.

Currently, a full time health assistant is available at Sunshine to assist pupils and/or staff in the health office and classroom while the assigned nurse is conducting evaluations, in IEPs meetings, traveling to satellite sites, or managing any of required duties.

PROGRAM SPECIALISTS

It was repeatedly shared during staff interviews that program specialist time is limited at school sites. Program Specialists indicated that their workloads make it more difficult to be on school campuses to provide teacher support.

It was reported that the roles and responsibilities of program specialists have fluctuated across school years. In the past, program specialists were assigned by type of program, grade level (e.g., preschool, elementary, secondary) and/or by disability group. For the 2016-17 school year, program specialists were assigned to a specific number of school sites. It appears that this new distribution of program specialist time was implemented for several reasons: (1) promotes a more equitable distribution of program specialist workload, especially across the mild to moderate programs; (2) provides a consistent contact person at a school site to ensure having a consistent source of information from the same person; (3) allows program specialists to work across the continuum of programs and services; and, (4) encourages more visibility on school campuses. However, it was shared consistently during the meetings with school site administrators and teachers that program specialists are spread so thin that their visibility at school sites has not increased.

As some program specialists have expertise in specific areas, these experts continued to support their special assignments, to include but not limited to: specific disability categories; preschool, speech and language development; psychological services; assistive technology; and, career vocational development. With the restructuring of program specialist assignment, along with new members of the special education management team, Monday morning management meetings have been initiated to problem-solve, share resources and best practices, as well as address policies and procedures. If a program specialist is assigned to a specific site, but another

program specialist oversees an area of expertise (e.g., autism or speech), then that expert will answer related questions at the management meetings.

Program specialist services are outlined below pursuant to CA EC §56368(b).

- (b) A program specialist may do all the following:
 - (1) Observe, consult with, and assist resource specialists, designated instruction and service instructors, and special class teachers.
 - (2) Plan programs, coordinate curricular resources and evaluate effectiveness of programs for individuals with exceptional needs.
 - (3) Participate in each school's staff development, program development and innovation of special methods and approaches.
 - (4) Provide coordination, consultation, and program development primarily in one specialized areas or area of his or her expertise.
 - (5) Be responsible for assuring that pupils have full educational opportunity regardless of the district of residence.

It appears that solving problems as well as addressing pressing needs and/or requests consume much of the program specialists' time.

The TSS Consultant conducted a survey for the purpose of this study across ten school districts with comparable enrollment. Each participating school district responded via e-mail. Information was validated by a second e-mail with follow-up correspondence for any clarification needed.

There is a wide disparity of positions with various job titles. However it is evident that RUSD has a lower number of administrative, managerial, or support staff than the other comparable sized districts. Those results are presented in **Figure 48**. For confidentiality, names of the participating districts are not included in this table.

Figure 48 – Comparison of Administrative Positions of Comparable Size School Districts

A	B	C	D	E	F
District	K-12 Enroll*	FTE Director or Higher Level	FTE Assistant Director or Administrator	FTE Coordinator or Supervisor	FTE Program Specialist or Case Manager
A	53,354	1 Administrative SELPA Director 2 Directors		2 Coordinators 1 Supervisor	12 Program Specialists ¹
B	53,303	1 Director, SELPA/Special Education	1 Assistant Director	4 Coordinators	9 Program Specialists ² 4 TOSAs
C	49,564	1 SELPA/Special Education Director	2 Program Managers	2 Center Principals	10 Program Specialists ³
D	49,098	1 Deputy Chief, Student Services and Special Education 1 Executive Director, Special Education 1 Senior Director, Special Education Also SELPA Director) 1 Director, Special Education		5 Coordinators 3 Program Managers	7 Program Specialists ¹ 3.5 Nonpublic School Case Carriers ¹
E	46,843	1 Special Education/SELPA Director		4 Supervisors	12 Program Specialists (non-management)
F. Riverside Unified	42,462	1 Assistant Superintendent, Pupil Services & SELPA, Special Education 1 Director Special Education/SELPA		2 Coordinators (1 operates Preschool Program acting as Principal)	6 Program Specialists ¹ 2 TOSAs support ED program and Alternative Education Campus
G	41,883	1 Administrator SELPA and Psychological Services	2 Assistant Directors		16.6 Program Specialists 1.3 Lead Psychologists ⁴
H	40,324	1 Executive Director Special Education/SELPA	4 Administrators		10 Program Specialists ⁵
I	38,742	1 SELPA Director	1 Assistant Director	4 Coordinators (1 is a BCBA)	5 Program Specialists ⁶ (2 for Behavior)

Source: California Department of Education Website: - Largest & Smallest Public School District – *CalEdFacts*

NOTES:

1. These positions are Teachers on Special Assignment (TOSAs).
2. These positions are not TOSAs or administrators. Their duties are between those two classifications.
3. These positions are administrators.
4. These positions are not considered administrative. However, the Board recently approved a Program Specialist Senior position, which will be administrative in nature to allow personnel to clear their administrative credentials. The District also has 1.3 Lead Psychologists. This position was created when the Director of Psychological Services retired and that position was not replaced. Technically that position is equivalent to Program Specialist.
5. These positions are not administrators.
6. These positions are management but not administration. They are not under the teacher association contract, and do not hold administrative credentials.

SPECIAL EDUCATION PROGRAM DELIVERY SYSTEMS

PREFACE

An analysis of the District's current special education program delivery systems was conducted to determine if they are appropriate as structured or if opportunities exist for enhancing program delivery in the least restrictive environment (LRE), in which to the maximum extent possible, students with disabilities are educated with other students in the regular educational environment. Based on input during the Stakeholder meetings with District and school level staff along with follow-up discussions with administrators and teachers, the focus areas listed below were highlighted.

- Evidence-Based Curriculum
- Special Education Programs
- Service Delivery – Least Restrictive Environment
- Psychological Services
- Adapted Physical Education Services
- Occupational and Physical Therapy
- Language and Speech Services
- Preschool Program

EVIDENCE-BASED CURRICULUM

Adoption of evidence-based curriculum and expansion of course offerings have provided special education students more access to the core curriculum. Highlights are listed below.

- The District Board of Education adopted evidenced-based curriculum for students with moderate to severe disabilities for English Language Arts, Math, Science, and Social Studies, and Social Skills. During the interviews. Teachers repeatedly expressed excitement about the materials, resources, and software that allow them to provided differentiated instruction and universal design for learning.

- Development and expansion of a specially designed Ninth Grade Introduction A-G Literature course, using evidence-based structured language routines embedded in the core curriculum.
- Research on adolescent literary of struggling readers was used to embed the strategies in grade level content standard work. Students are progress monitored in these classes to assess the efficacy.
- The special education staff developer, along with a general education staff developer who wrote the curricula adaptations, provides training.
- Haiku video tutorials for Units of Study are available for special education teachers. Teachers of these courses have daily lesson plans, which incorporate student engagement, multiple means of teaching the content, project-based learning activities, and multiple means of student expression of understanding.
- The District is in the process of writing 10th Grade and up units to expand the offerings to provide mild to moderate special education students with grade level access using Universal Design for Learning (UDL) principles beyond just having a Read 180 Intervention Program. These are the same Units of Study used in general education; however, the specialized academic instruction was infused in the curricula.

SPECIAL EDUCATION PROGRAMS

The District provides a comprehensive continuum of programs for special education students across the school sites, including alternative campus. Highlights are listed below.

- All school sites provide Resource Specialist Programs (RSP).
- The RSP configuration at the middle and high school levels include several components:
 - Students are provided Strategies for Success (SFS) for one period, with remaining classes provided in general education;
 - Students are enrolled in four periods of special education, with remaining classes provided in general education.
- The design of SFS is to provide program support for special education students in RSP through a one-period support class with a defined curriculum and also study support. The students are mainstreamed for the remainder of the day in general education courses. The goal of SFS is to educate RSP students in the least restrictive environment while providing focused, on-going support in the general education curriculum allowing them the greatest opportunity for academic success. Teachers have access to an SFS Haiku course, which has curriculum and instruction scope and sequences for each grade as well as lesson plan resources.
- The elementary Special Day Class (SDC) program configuration across the District includes a broad range of classes to serve students with mild to moderate disabilities, moderate to severe disabilities, emotional disturbances, and autism.
- Every high school provides a SDC program to serve students with mild to moderate disabilities and students with moderate to severe disabilities.
- Students with mild to moderate disabilities, not enrolled in SFS, could be served (as appropriate) in a designated class for their core subject areas taught by a special education teacher.

- Read 180/System 44 Intervention training is available to all 7-12 staff members who are teaching a Read 180/System 44 Section on an ongoing basis. Students are placed in the program based upon an IEP decision. Teachers have access to Read 180/System 44 staff development support.
- Ninth and tenth grade Specially Designed A-G Eligible Sections of ELA are available at each high school. Students receive the same curriculum and grade level standards instruction infused with evidence-based skill and concept instruction. Teachers are provided ongoing professional development and daily lessons in order to implement the program with their students. The IEP team determines the instructional support/intervention that best meets each student's needs.
- There is a Math 1 Co-Teaching Pilot at North High School. A general education and special education teacher at North are piloting a co-teaching model for the delivery of Math 1.

SERVICE DELIVERY

In speaking with District and school site administrators as well as teaching staff (both general and special education), it appears that there are limited “push-in” or integration models at the secondary level. Integration models could include, but not limited to the majority of services provided in general education classes with the following support: (a) collaboration with a special educator (e.g., consultation, co-teaching, team teaching); (b) integrated therapy in which related services is provided within the general or special education class (e.g., speech and language development); (c) specialized academic instruction in the general education class; and/or (d) a combination of the supports thereof.

On the contrary, “pull-out” models include, but not limited to the majority of services provided in the special education setting as follows: (a) specialized academic instruction in RSP or SDC; (b) related services in a therapy room; (b) non-public school placement; (c) home/hospital instruction; or (d) instruction in a non-classroom setting.

This school year, a “full-inclusion” Math 1 Class is being piloted at North High School. In this pilot, both a special education and general education teacher are co-teaching the class. Special education students participating in the pilot will no longer be required to take Math 1 in a two-year block, thus opening up their schedules for other classes that are needed to complete graduation requirements. Moving forward, the District would like to expand its full-inclusion opportunities at all campuses across a variety of subject areas; although, the initial target would be ELA and Math courses.

A workshop was held October 26, 2016 featuring Dr. Richard Villa, co-author of *A Guide to Co-Teaching – New Lessons and Strategies to Facilitate Student Learning*. Student Advisors were encouraged to participate and the District asked school sites to identify mild to moderate secondary teachers representatives and general education colleagues) who may be good candidates for co-teaching full inclusion classes to participate in the October 26, 2016 training. School-site administrators were encouraged to participate as availability allowed. There are plans for follow-up training in the spring of 2017.

Least Restrictive Environment

As required by the Individuals with Disabilities Education Act (IDEA) of 2004, Part B, the California Department of Education (CDE) Special Education Division (SED) has developed the State Performance Plan (SPP), which is a six-year plan covering fiscal years (FY) 2013–14 through 2018–19. The **DOR, not DOS**, pupil count is used for the accountability at the district or county office level for identified State Performance Plan Indicators (SPPI). The CDE identifies certain local educational agencies (LEA) as significantly disproportionate based on race or ethnicity with respect to the identification of children with disabilities; the identification of children in specific disability categories; the placement of children with disabilities in particular educational settings; or the incidence, duration, and type of disciplinary actions, including suspensions and expulsions. Under IDEA requirements, if a LEA is identified as significantly disproportionate, the LEA must reserve 15 percent of its 611 and 619 IDEA grant funds to provide comprehensive CEIS to students in the LEA. These services are specifically reserved for students who do not currently receive special education services, but who need additional academic and behavioral supports to succeed in a general education environment. (Source: CDE *Significant Disproportionality Coordinated Early Intervening Services Requirements and Instructions 2016*)

Indicator 5–Least Restrictive Environment is an annual performance report measurement used by the SED according to its SPP measurements. Indicator 5 measures the average amount of time special education pupils, between the ages of 6 through 21, receive their services in settings apart from peers without disabilities. Three measurement factors for Indicator 5 are listed below.

- D. Inside of the regular class 80 percent or more of the day
Note: Indicator 5A typically refers to students served in RSP classrooms.
- E. Inside regular class less than 40 percent of the day
Note: Indicator 5B typically refers to students served in SDC classrooms.
- F. In separate schools, residential facilities, or homebound placements
Note: Indicator 5C refers to students served in nonpublic or separate schools.

The RUSD did not meet its state-imposed targets for Indicator 5A and 5B. The 5C target was met in 2013-14, but not 2014-15. The LRE Annual Performance Report is outlined in **Figure 49**.

Figure 49 – Annual Performance Report for Least Restrictive Environment (Indicator 5), December 2013 and 2014

A		B		C		D		E		F	
Measure		Total # Pupils receiving SPED (Ages 6-22)		# Pupils in the Environment		% Pupils in the Environment receiving SPED		Target This Year		Target Met	
School Year		2013	2014	2013	2014	2013	2014	2013	2014	2013	2014
A. >80%	4,295	4,265		1,602	1,564	37.3%	36.7%	>49.2%	>49.2%	No	No
B. <40%				1,578	1,529	36.7%	35.8%	<24.6%	<24.6%	No	No
C. Separate Schools				175	192	4.1%	4.5%	< 4.4%	< 4.4%	Yes	No

Data Source: December 2013 and 2014 CASEMIS Submission Items District of Accountability, Age, and a compiled data field consisting of unduplicated Federal School Setting and Percent in Regular Class. **Note:** Separate Schools includes Students in Separate Schools, Residential Facilities and Homebound/Hospital. It does not include students in Correctional Facilities or those that are Parentally Placed in Private School.

PSYCHOLOGICAL SERVICES

Intensive behavioral intervention supports and services are provided, including global implementation of Boys Town curriculum and interventions across all classes designed for students with emotional and behavioral disorders. These supports and services are implemented and monitored by a team of eight school psychologists and two TOSAs who are Certified Trainers in the Boys Town model.

The Department of Psychological Services maintains a behavior team focused on ongoing training and implementation of evidence-based behavior interventions and plans including the Positive Environments, Network of Trainers (PENT). PENT is California's Positive Behavior Initiative designed to provide information and resources for educators striving to achieve high educational outcomes through the use of proactive positive strategies.

The Department of Psychological Services has significantly increased its support to students who are either in NPS settings or are being considered for entry into a NPS. These psychological supports allow students access to a less restrictive environment. Funding is made available through Educationally Related Mental Health Services (ERMHS). These services are provided to students who have significant socio-emotional or socio-behavioral needs that impede their ability to benefit from their special education program. The ERMHS are required to be listed on the student's IEP as a 500 Code category (e.g., counseling, psychological services, behavior intervention). See **Figure 45** for a list and description of these categories.

As displayed in **Figure 44**, there was a decline of 28 services in the 500 Code categories. It was reported that there are several reasons for this decline as listed below.

1. Many services provided by PENT or Board Certified Behavior Analyst (BCBA) trained psychologists are focused on behavior and are reflected in the portion of the IEP designated as "supports to school personnel" as opposed to being coded in the services page.
2. "Psychological Services" (Code 520) provided by the school psychologist may not be reflected on an IEP.
3. With the emphasis on training teachers and instructional assistants in Boys Town as a mechanism for behavior and social-emotional support, this is often provided and supervised by a TOSA or a school psychologist without being reflected on the IEP.

Local Control and Accountability Plan that Support Psychological Services

The Student Assistance Program (SAP) was repeatedly cited during the stakeholder meetings as a critical resource for special education students. Examples of SAP services implemented in

2015-16 included, but were not limited to: consultation/collaboration with school staff; family intake interviews; and, individual and/or group counseling.

Action/Service 3.1a of the LCAP includes implementation of the SAP with social and emotional support personnel to provide Positive Behavior Behavioral Interventions and Supports (PBIS).

Furthermore, Action/Service 3.1b – Support for Child Welfare and Attendance has benefited students with disabilities pertaining to: revision of Sequential Discipline Guidelines; and, training and support of site administration and support staff regarding, but not limited to alternatives to suspensions, other Means of Correction, and Restorative Practices. While working recently with a member of the “Public Counsel,” the Director of Pupil Services received correspondence asking about any particular efforts taken by RUSD that could account why the District is not disproportionate in school discipline for special education students, which is difficult to achieve.

To validate this observation, reprinted in **Figure 50** is RUSD’s Indicator 4–Suspension and Expulsion, which is an annual performance report measurement used by the CDE Special Education Division pursuant to its State Performance Plan (SPP).

Indicator 4: Suspension and Expulsion: Percent of all students ages 3 through 21 receiving special education that are suspended or expelled for greater than ten days in the school year.

Indicator 4a: Overall: percent of all students with disabilities in the local educational agency (LEA) that was suspended or expelled for greater than ten days in a school year.

Figure 50 – 2014-15 Annual Performance Report for Suspension and Expulsion (Indicator 4)

A	B	C	D	E
# Pupils with Disabilities Suspended or Expelled for More than Ten Days	Total # Pupils with Disabilities	% Pupils with Disabilities Suspended or Expelled for More than Ten Days	Statewide Rate	Over Statewide Rate?
38	5,423	0.70	2.435	No

ADAPTED PHYSICAL EDUCATION SERVICES

As shown in **Figure 51**, there was a notable decrease in the number of adapted physical education (APE) services provided: from 115 reported on December 1, 2011 to 78 services provided as of December 1, 2015. It was reported that 80 services were provided as of November 2016.

Figure 51 – Adapted Physical Education Provided by Age Group, December 2011 – 2015

A	B	C	D	E	F	G
Age Group	0-2	3-5	6-11	12-21	22+	Total
December 2011	0	4	62	49	0	115
December 2012	0	4	63	35	0	102
December 2013	0	2	49	35	0	86
December 2014	0	3	46	24	0	73
December 2015	0	4	61	13	0	78

Source: CASEMIS *Special Education Enrollment Data Report* by Service and Age, District of Service

The majority of the APE services at the preschool and elementary schools are based on a “pull-out” model providing individualized and/or small group instruction pursuant to the student’s IEP. At the middle and high school levels, APE teachers provide specially designed services in the general education PE classes and/or individualized and/or small group instruction. They also instruct classes for students with moderate to severe disabilities. This allows a preparation period for the SDC teachers.

One APE teacher indicated a pre-referral process would be helpful, in which individual modifications and interventions are documented by general education physical education (PE) teachers and/or special education teachers prior to referring for assessment. This process would assist general and special education teachers in ascertaining if a student has appropriate motor and coordination skills functioning at appropriate levels specific to preschool to kindergarten, elementary, and secondary levels.

Several resources for consideration are presented below.

1. *Adapted Physical Education Guidelines in California Schools*, Revised 2012
<http://www.srcs.k12.ca.us/District/SS/Documents/APE%20Guidelines%202012.pdf>.
2. *Guidelines for Adapted Physical Education*, Connecticut State Department of Education
<http://www.sde.ct.gov/sde/lib/sde/pdf/publications/apeguide/apeguide.pdf>.
3. Hemet Unified School District’s *Adapted Physical education (APE) Referral Process*, motor skills checklists and surveys. The Hemet guidelines and worksheets will be provided for information to RUSD under separate cover from this report.

OCCUPATIONAL AND PHYSICAL THERAPY

As shown in **Figure 52**, there was a notable increase in the number of occupational therapy services provided: from 126 reported on December 1, 2011 to 167 services on December 1, 2015. It was reported by the Occupational Therapist Registered (OTR) interviewed that, as of September 2016, there were approximately 200 pupils receiving occupational therapy. Approximately one-third of those pupils receive services from a nonpublic agency (NPA).

Figure 52 – Occupational Therapy Services Provided by Age Group, December 2011 – 2015

A	B	C	D	E	F	G
Age Group	0-2	3-5	6-11	12-21	22+	Total
December 2011	0	20	83	23	0	126
December 2012	0	23	106	26	0	155
December 2013	0	25	120	28	0	173
December 2014	0	29	112	36	0	177
December 2015	0	32	101	34	0	167

Source: CASEMIS *Special Education Enrollment Data Report* by Service and Age, District of Service

As shown in **Figure 53**, the number of physical therapy services provided across December 2011 through 2015 was consistent. All physical therapy services are provided by NPAs.

Figure 53 – Physical Therapy Services Provided by Age Group, December 2011 – 2015

A	B	C	D	E	F	G
Age Group	0-2	3-5	6-11	12-21	22+	Total
December 2011	0	9	49	11	0	69
December 2012	0	8	47	12	0	67
December 2013	0	6	54	11	0	71
December 2014	0	11	45	12	0	68
December 2015	0	16	42	15	0	73

Source: CASEMIS *Special Education Enrollment Data Report* by Service and Age, District of Service

The NPA costs for occupational/physical therapy services provided by one vendor were reduced by approximately \$136,000 from FY 2011-12 to 2015-16 (see **Figure 16**). The District continues to work hard with NPAs to ensure that assessments and services provided are “educationally-based” rather than “medically-based.” The District has taken precautions in assuring that NPAs do not simultaneously conduct assessments and provide services for the same students.

Several helpful resources that include detailed information and examples of services for school-age children within the educational setting include: (1) Riverside County SELPA’s, *Guidelines and Tool for Educationally Necessary Occupational and/or Physical Therapy* (August 2013); and, (2) California Department of Education (CDE) *Guidelines for Occupational Therapy and Physical Therapy in California Public Schools* (Second Edition 2012).

Provided in the CDE guidelines are screening/evaluation and referral forms, assessment considerations, educational assessment methods, procedures, and tools, as well as intervention plans and data collection measures. This assessment information will communicate and delineate the role of school-based therapy to parents. Including standardized testing results in initial and triennial assessments will allow for greater data to support a therapist's recommendation to decrease or exit services. If current assessments are determined to be primarily subjective versus objective, this may allow the questioning of opinion versus data; which triggers increased services or difficulty exiting students. These guidelines also include an informative section on Response to Instruction and Intervention (RtI²) defining a general education approach of high-quality instruction and early intervention. Also, strategies and examples are provided for the following three tiers: Tier 1 Universal Screening and Intervention; Tier 2 Targeted Group Intervention–Strategic; and, Tier 3 Individualized Consultation–Intensive.

LANGUAGE AND SPEECH SERVICES

Earlier in this report in **Figure 40**, a comparison was made for December 2014 and 2015 as to the number of pupils who received language and speech services. That comparison was expanded to earlier pupil count years in **Figure 54** below. As shown in Row 3, there were 784 pupils, not identified as speech and language impairment (SLI) as a primary disability, who received speech therapy as a related service. There was an increase of 283 pupils (1,067 minus 784) from December 2011 to December 2015. This represents a growth of 36.10 percent.

There are no statewide benchmarks regarding the percent of speech therapy provided to pupils with a primary speech disability as compared to those receiving speech therapy as a related service, supplementing the primary special education instructional program. However, it appears that the number of speech services is steadily increasing each year.

Figure 54 – Comparison of Speech or Language Impairment as a Primary Disability to Number of Pupils Receiving Speech Therapy (by District of Service), December 2011 – 2015

A	B	C	D	E	F	G
	2011	2012	2013	2014	2015	% Change 2011 to 2015
Row 1: # Pupils with SLI as a Primary Disability	1,410	1,351	1,271	1,239	1,188	(15.74%)
Row 2: # Pupils Received Speech Services	2,194	2,194	2,204	2,212	2,255	2.78%
Row 3: Difference of Row 1 and Row 2	784	843	933	973	1,067	36.10%
Row 5: % of Pupils Not SLI as Primary Disability but Received Speech Services	35.73%	38.42%	42.33%	43.99%	47.32%	

As shown in **Figure 55**, the largest growth in language and speech services was at the age group of 6–11 years old, with a decline of 100 pupils served from December 2011 (1,329) to December 2015 (1,229). On the other hand, there was an increase of 110 pupils in the age group of 3–5 years old during that same time period from 380 to 490.

Figure 55 – Language and Speech Services Provided by Age Group, December 2011 – 2015

A	B	C	D	E	F	G
Age Group	0-2	3-5	6-11	12-21	22+	Total
December 2011	0	380	1,329	485	0	2,194
December 2012	0	369	1,343	482	0	2,194
December 2013	3	395	1,281	525	0	2,204
December 2014	1	427	1,249	535	0	2,212
December 2015	0	490	1,229	536	0	2,255

The District offers the Speech Intervention Program (SIP). The SIP is provided to select general education students who are acquiring one or two speech sounds later than is typical for their age, as well as for those in need of language and/or social skill intervention. The SIP is not a related service under special education. It is designed for those students whose area(s) of need may interfere with classroom participation. Students receive short-term speech interventions outside their general education classroom provided by the school's speech team. The length and frequency of the intervention is determined and coordinated with the classroom teacher so as not to interfere with critical classroom instruction. The SLP works with the classroom teacher and parents to reinforce skills and to provide periodic progress updates. Students may be expected to complete daily practice assignments at home. This is an excellent program and supports the concept of RtI.

The Lead SLP works closely with District Special Education administration and has developed comprehensive worksheets to ensure that all campuses are adequately covered for speech services. Also, tracking spreadsheets are used to ensure that LEA Medi-Cal billing reimbursements are maximized.

It was reported by numerous SLPs that there is a good support system among the speech pathologists. Training has been made available to SLPs and psychologists on conducting collaborative assessments – processing strengths and weaknesses assessment models. A District speech representative attends the monthly Inland Empire Region 10 meetings and brings back the most current information to the other therapists. The majority of the SLPs have been trained on the earlier versions of the Communication Severity Scales (CSS). One of the District's SLPs attended the trainer of trainers on the CSS Third Edition 2016 recently and the District is planning to train all SLPs on the latest version in the spring.

During the stakeholder meetings, several school site administrators and service providers suggested that there could an over-representation of special education students who are also English Language Learners (ELL), specifically in the disability categories of specific learning disabilities or speech and language impairment.

PRESCHOOL PROGRAM

The RUSD has one special school campus, Sunshine Early Childhood Center. This school offers unique curricula especially designed to meet the learning needs of preschool pupils with disabilities. Head Start classes and the Peer Buddy Program provide peer modeling. There are also four satellite programs at different elementary school sites.

Special day classes available at Sunshine are listed below.

- 4 classes for students with autism
- 2 classes for students with moderate to severe disabilities
- 6 classes for students with mild to moderate disabilities
- 1 Head Start program
- 1 transitional kindergarten class

There are AM (7:45 AM – 11:30 AM) and PM classes (11:15 – 3:15 PM classes. The AM teachers share 45 minutes with the PM teachers and vice versa. Special education preschool pupils, as appropriate, participate with Head Start students in school-wide activities.

It was suggested by the preschool staff interviewed that there is a need for more “non-categorical” classroom settings with more typical peers. As required by the state, the Early Childhood Program uses the Desired Results Developmental Profile (DRDP). This is a formative assessment, developed by the CDE, which measures and provides a Developmental Continuum from Early Infancy to Kindergarten Entry.

The RUSD did not meet its Indicator 6–Preschool Least Restrictive Environment for 2013-14 and 2014-15. Indicator 6 measures the percent of children ages 3 through 5 with IEPs attending:

- A. Regular early childhood program and receiving a majority of special education and related services in the regular program; or,
- B. Separate special education class, separate school or residential facility.

The LRE Annual Performance Report for Indicator 6 is provided in **Figure 56**.

Figure 56 –Annual Performance Report for Preschool Least Restrictive Environment (Indicator 6), December 2013 and 2014

A	B		C		D		E		F	
Measure	Total # Pupils receiving SPED (Ages 3-5)		# Pupils in the Environment		% Pupils in the Environment receiving SPED		Target This Year		Target Met	
School Year	2013	2014	2013	2014	2013	2014	2013	2014	2013	2014
A. Regular Program	485	519	97	130	20.0%	25.0%	>39.8%	>32.9%	No	No
B. Separate			357	367	73.6%	70.7%	<34.4%	<34.4%	No	No

Data Source: December 2013 and 2014 CASEMIS Submission Items District of Accountability, Age, and Federal Preschool Setting

The RUSD did not meet its Indicator 7–Preschool Assessments for 2013-14 and 2014-15. Indicator 7 measures the percent of children ages 3 through 5 with IEPs attending who demonstrate improved as follows:

- A. Positive social-emotional skills (including personal relationships);
- B. Acquisition and use of knowledge and skills (including early language/communication and early literacy); and,
- C. Use of appropriate behaviors to meet their needs,

The LRE Annual Performance Report for Indicator 7 is provided in **Figure 57**.

Figure 57 –Annual Performance Report for Preschool Least Restrictive Environment (Indicator 7), December 2013 and 2014

A	B		C		D		E		F	
Outcome A	Improved		Total		Percent		Target		Met?	
School Year	2013	2014	2013	2014	2013	2014	2013	2014	2013	2014
Substantially Increased	34	39	61	68	55.7%	57.4%	72.7%	72.7%	No	No
Functioning within age expectations	69	75	108	122	63.9%	61.5%	82.1%	82.1%	No	No
Outcome B	Improved		Total		Percent		Target		Met?	
School Year	2013	2014	2013	2014	2013	2014	2013	2014	2013	2014
Substantially Increased	35	38	59	75	59.3%	50.7%	70.0%	70.0%	No	No
Functioning within age expectations	67	71	108	122	62.0%	58.2%	82.5%	82.5%	No	No
Outcome C	Improved		Total		Percent		Target		Met?	
School Year	2013	2014	2013	2014	2013	2014	2013	2014	2013	2014
Substantially Increased	32	42	49	69	65.3%	60.9%	75.0%	75.0%	No	No
Functioning within age expectations	69	76	108	122	63.9%	62.3%	79.0%	79.0%	No	No

Data Source: Napa County Office of Education (via a DRDP contract–compilation of CASEMIS Data)

TRANSITION SERVICES

The vision of the Transition Program is reprinted below from the District webpage: www.rusdlink.org/earn

“The vision of Riverside Unified School District for a Transition Program includes a partnership of students, parents, staff and community. The program recognizes and values excellence, individuality, diversity, and creativity. We are committed to the intellectual achievement, the emotional and social growth, and the aesthetic development of each student. We are dedicated to graduating students who are self-starters, technologically competent workers, life-long learners, responsible citizens and cooperative, effective communicators. For students receiving a certificate of completion, the district’s goal is to assist the development of functional academic and vocational skills that can transfer to an adult work program or day activity program.”

There are three full-time Transition Specialists, certificated teachers, who are assigned as follows: (1) one specialist at the middle school level; (2) one specialist at the high school level; and, (3) one specialist serving students with moderate to severe disabilities. The Transition Specialists can attend IEPs upon request and work with students in group setting and class presentations. Annually a group of special education teachers visits different work assistance agencies and career technical sites. They share this information with other teachers and students. Also, seniors attend job fairs and community colleges.

Every student, grade 7 through – adult school-aged, take a career survey, which differs by grade level. This information is shared with special education teachers to incorporate into the students' individualized transition program (ITP). Students are eligible to participate in the Workability grant program from the California Department of Education in which they are paid for daily job training. Two full-time Job Developers work mild to moderate students placing them on job training experiences with wages subsidized by the Workability Grant. The District's goal is to place over 220 students with paid job experiences for at least 50 hours, with the hope that they are hired by the sites and/or companies for which they are working.

There is an array of transition services provided, which is highlighted on the RUSD webpage referenced earlier. The link to this webpage is on the back of the business cards for those employees working with the Transition Program. The District provides a life skill vocationally based curriculum to individuals with significant disabilities ranging in age from 19-22 years old. The curriculum model, Transition Education Adjustment Model, is known as Project TEAM. Job skill classes are also provided at the high schools and in the process of getting this course Career Technical Education (CTE) certified.

RESPONSE TO INTERVENTION AND MULTI-TIERED SYSTEM OF SUPPORTS

PREFACE

In looking at a system of operations and instructional settings, special education as a service under a Response to Intervention (RtI) and Multi-Tiered System of Supports (MTSS) was addressed. The RtI is an instructional framework focused on all students' response to effective instruction and intervention across three tiers: (a) Tier 1 includes research-based core instruction; (b) Tier 2 involves targeted intervention; and (c) Tier 3 includes intensive intervention.

On the other hand, MTSS is a more comprehensive framework that encompasses RtI, and provides multiple levels of support in the areas of academic, social, emotional, and behavioral development. The MTSS also aligns resources and supports for students, teachers, and other support staff, with a focus on collaboration among departments and across general and special education. (Source: *ReadingHorizons*, "What is the Difference Between RTI and MTSS?" by Stacy Hurst)

During the stakeholder meetings held in September, the following question was asked of all participants:

Tell us what is happening at the District level or at your school site with regard to RtI or and MTSS?

Provided below is a summary of the responses and or consistent themes related to RtI and MTSS.

- Many comments indicated the District is in early stages of implementing RtI and MTSS, with continuous improvement.
- In the context of the RtI prevention model, universal screening is used as the first step in identifying students who are struggling to learn.
- Student Success Team (SST) process is inconsistently implemented across the District.
- Special education teachers shared that they are trained alongside general education teachers and appreciate this interaction and learning experience together.
- Although the District is in the initial stages of implementing MTSS and RtI, teachers and support providers were interested in having a better understanding of each of these components and how they can become more involved.
- There appears to be a lack of direction regarding Positive Behavioral Interventions and Supports (PBIS).

Some of the teaching staff did not know the distinction between RtI and MTSS; however, it appears that numerous educators were providing levels of support within the context of RtI and/or MTSS.

MULTI-TIERED SYSTEM OF SUPPORTS

The District has a clear understanding of a MTSS framework and has implemented elements of MTSS initiated this school year. Considerable district-wide planning has occurred through the Curriculum and Instruction Department, and a MTSS Specialist has been employed. Special Education Department representatives have been included in this process and attend monthly focus meetings.

Goal 2, Action/Service 2.1 of the RUSD Local Control and Accountability Plan (LCAP) includes priorities, actions, and funding to “identify, evaluate, and implement districtwide multi-tiered system of support.” This includes: (a) Tier I: core instruction (e.g., small group intervention, universal screening); (b) Tier II: strategic intervention (e.g., focus on K-12 ELA and Math and LAB program for English Learners) (c) Tier III: intensive intervention (evaluate effectiveness of Read 180 and Systems 44; K-2 reading intervention). Students with disabilities are a targeted group to be served within the identified scope of study. During the meetings with teachers, several special education teachers indicated that they were participating in the MTSS pilot at North High School to establish a data-driven system using the North feeder pattern as proof of concept.

The “Aimsweb” is used at K-6 across the District, which is a web-based system for universal screening, progress monitoring of benchmark scores for reading and mathematics, and

management of comparative data to inform instructional decisions. Also, RUSD uses Dynamic Indicators of Basic Early Literacy Skills (DIBELS) from kindergarten through sixth grade. The DIBELS are a set of procedures and measures for assessing the acquisition of early literacy skills from kindergarten through sixth grade. They are designed to be short (one minute) fluency measures used to regularly monitor the development of early literacy and early reading skills.

This is the first year that RUSD is using the Northwest Evaluation Association (NWEA) – Measures of Academic Progress (MAP) as an assessment tool or screener for seventh through twelfth grades. The NWEA MAP measures progress toward learning objectives, student academic growth, and informs instruction.

Although RUSD has yet to implement a global MTSS structure that is consistently implemented with fidelity at all school sites, the Department of Special Education has provided consultation and expertise to those committees and persons who are responsible for district-wide implementation. This includes attendance at MTSS meetings and extending invitations to trainings offered by the Department of Special Education and Department of Psychological Services, which will help inform the development process. Furthermore, school psychologists and other department personnel have received extensive training in Boys Town, social-emotional supports, and trauma-informed classrooms. Additionally, psychologists and other Special Education Department personnel have received extensive training in dyslexia and other academic interventions. With these components, psychologists and special education staff are ready to step into various roles in the tiers of MTSS.

Special education administrators participate on the “Principal Collaborative Site Leadership Team” meetings held at the different school campuses. Also a team of RUSD general and special education staff members participate in the California “Scale-Up MTSS Statewide” (SUMS) Initiative awarded to the Orange County Department of Education. The SUMS Initiative is designed to promote and expand the use of MTSS.

Note: In December 2015, the California Department of Education announced it would accept applications from county offices of education to lead a new project called “Developing, Aligning, and Improving Systems of Academic and Behavioral Supports.” Funding for the project was appropriated in response to recommendations from a March 2015 California Statewide Special Education Task Force Report that cited the need for a unified MTSS framework capable of aligning the state’s educational systems and services, many of which remained uncoordinated. (Reference: Orange County Department of education News Release, July 11, 2016)

STUDENT SUCCESS TEAM

All components of the Student Success Team (SST) intervention process have been integrated within a MTSS and RtI structure to include detailed procedures, forms, and professional development. School sites complete action plans on how to effectively implement the SST process according to best practices based on their needs of individual sites. The AIMSweb and DIBELS are used universal screening and progress monitoring systems for academics and behavior based on brief, direct, and continuous student assessment, utilizes Curriculum-Based Measures (CBM) to predict student achievement.

The SST components listed below are available for use by school sites.

- SST guidelines, procedures with a three-level process are embedded into MTSS, with user-friendly forms to include: MTSS Standard Intervention Documentation; SST Summary Form and Follow-up Form
- Comprehensive SST Facilitator Training on the embedded MTSS and SST Process
- MTSS Critical Components Checklist

There is a series of training available for SST-MTSS this school year. Also, products from Region 10 on English Language Learners (ELL) and Special Education have been integrated into these materials. Haiku sites are also available as listed earlier for SST-MTSS.

STAKEHOLDER INPUT

PREFACE

A key component of this study included the interviewing of key stakeholders and considering their priorities. In-person interviews were held on September 28, 29, and 30, 2016. Subsequent telephone conferences were conducted with other individuals who were not available on those dates or with other persons recommended during the interviews who were not included on the original interview list. The TSS Consultants provided their contact information for participants to provide follow-up materials and/or additional input as needed.

The purpose of the interviews was to ascertain: (a) challenges and/or areas of concern; (b) collaboration between general and special education at district-level (across departments) and at school sites; (c) effectiveness of special education operations; (d) commendations and/or sharing of exemplary practices; (e) effectiveness of communication between District and parents regarding special education services and practices; and, (e) staff and parent suggestions for positive change.

INTERVIEW PROCESS WITH DISTRICT PERSONNEL

A template, “Interview Schedules for Meetings with Certificated and Classified Staff” was provided to the District Special Education Department prior to the scheduled meeting dates. A list of possible job classification titles of persons to be included on the interview schedule was outlined on the template. All meetings were held at the District Special Education Office with one-hour time slots, from 8:00 AM to 5:00 PM each day. Two TSS Consultants simultaneously conducted the interviews.

Approximately 60 persons from the RUSD were interviewed over the course of the three-day period. For confidentiality purposes, specific names of persons who participated in the discussions will not be listed. Job classifications and/or positions of personnel interviewed are below in alphabetical order.

- Adapted Physical Education Teachers
- Alternative Education Representatives Assistant Principals
- Assistive Technology Specialists

- Educational Services Administrators (Curriculum and Instruction)
- General Education Teachers (Elementary, Middle, and High School)
- Human Resources Personnel for Certificated and Classified
- Individual Board Members
- Resource Specialists Program Teachers (Elementary, Middle, and High School)
- Mental Health-related Staff
- Mild/Moderate Special Day Class Teachers (Elementary, Middle, and High School)
- Moderate/Severe Special Day Class Teachers (Elementary, Middle, and High School)
- Nurses
- Occupational Therapists
- Preschool and pre-Kindergarten Special Education Teachers
- Principals (Elementary, Middle, and High School)
- Principal/Coordinator
- Program Specialists
- Psychologists
- Special Education Administrators
- Special Education Instructional Assistants
- Special Education Program Specialists
- Speech Pathologists
- Parents and Community Members (evening Forum)
- Special Education Teachers on Special Assignment
- Student Advisors (Lead Special Education Teachers-Administrative Designees)
- Visual Impairment Specialist

A one-page overview of the scope of work was provided to each participant along with a brief verbal review of the project from the TSS Consultants. The format of the interviews involved open-ended discussions and the TSS Consultants shared the following message,

“We are most interested in learning from “you” regarding what is working and what is not working. We would like to hear about the great things that are happening as well as what areas need to be improved. Also, we are most interested in any recommendations that “you” may have for change and/or suggestions for more effective delivery of services or programs.”

Listed below were the questions asked.

1. What do you see as a strength or strong areas of the Special Education programs and services in RUSD?
2. What would you change or add to make the programs and services better?
3. Tell us what is happening at the District level or at your school site with regard to Response to Intervention (RtI) or Multi-Tiered System of Supports (MTSS)?
4. How would you describe the flow of information or communication between the District Office and school sites as well as with parents?
5. If we could do one thing for you – what would you want us to do?

DISTRICT PERSONNEL INPUT

District personnel who participated in the interview process were professional and open in sharing their concerns as well as constructive ideas for improvement. Each Board member was interviewed individually as well. There were many positive comments shared during the discussions and it was evident that the members of each job-alike group respect one another and collaborate to do what's best for students.

To maintain confidentiality, specific challenges and/or concerns raised by individual District personnel will not be listed specifically, but integrated throughout the report. Consistent themes and/or general comments shared repeatedly throughout the interviews are summarized below.

Strengths and Strong Areas of Special Education Programs and Services

- There is a high level of commitment of special education teachers.
- Special Education Advisors are invaluable, provide updated information, as well as continued support to special education teachers.
- Professional development activities, instructional support, and digital communication for staff training are comprehensive. There are excellent staff development specialists who are from both Special Education and Curriculum and Instruction Departments.
- The addition of more translators for interpreting during IEP meetings and translating IEP documents has helped greatly in covering the needs of parents fully understanding throughout the IEP meetings as well as receiving translated documents in a timely manner.
- The Student Assistance Plan (SAP) is wonderful and provides counseling services that are easily accessible for students exhibiting behaviors that are impeding learning.
- Newly adopted curriculum for student with moderate to severe disabilities is effective and consistently utilized in all programs.
- There is a comprehensive continuum of services for special education students and the programs are managed well.
- The strategic Math and English Language Arts (ELA) instruction is very structured and works well and can be differentiated for students with mild to moderate disabilities.
- Strategies for Success (SFS), taught at both the middle high school levels, is an excellent support program for resource specialist students.
- The Superintendent is very supportive of special education. He and his wife even attend high school special education dances.
- Leadership and support from the District special education administrators is very good, timely, and extremely helpful.

Response To Intervention (RtI) Or Multi-Tiered System of Supports

A summary of these responses has been included in the earlier section on this topic.

Changes or Additions to Improve Special Education Programs and Services

- There was an overwhelming recommendation for additional program specialist positions to allow services provided at school sites.
- Some sites have more interventions than other sites. How can this be equitable across the District, especially in the areas reading intervention?
- Utilize the Student Success Team (SST) process consistently across all school sites.

- Change the focus of special education from “pull-out” categorical programs to an integration service model.
- Co-teaching and more engagement of special education students in general education classrooms were repeatedly suggested as priorities. Establish more inclusive classrooms and more opportunities for students with disabilities to learn alongside their general education peers.
- More supportive relationships and school connectedness with the programs for students with moderate to severe disabilities.

Flow of Information or Communication

- Overall feeling that the Special Education Department is well run. District special education administrators are accessible and supportive to administrators, teachers, and support service providers.
- Oral and written communication from the District Office to the school sites is strong and school personnel receive responses in a timely manner.
- Professionalism and expertise of program specialists are appreciated; however, their time is stretched and more program specialist services are needed at the school site level. Sometimes information or responses on the same questions/issues are different.
- As numerous educators wear different hats, some do not have the larger picture of the system and how it works.
- Department Chairs and Student Advisor positions (at secondary sites) are very helpful, reviewing current information with teachers and/or related services staff.
- A series of district-level monthly meetings are held for specific groups (e.g., administrators/managers, department chairs, related and support service providers such as psychologists, speech pathologists. This allows the sharing of pertinent information across job-alike groups.
- Overall, special education teachers believe communication with parents is good.
- There may not be transparency across all school sites for parents with regard to the special education eligibility and IEP process.

Wish List (If we could do one thing for you – what would you want us to do?)

- Teachers, related service providers, and support staff considered student needs first when asked the question, “If we could do one thing for you – what would you want us to do?” Many of their answers were student-based so that their students could have maximum opportunities to learn and progress.
- A more knowledgeable approach and positive attitudes on the part of administrators and teachers when addressing obstacles that emerge related to accepting and serving special education student in least restrictive educational settings.
- More work needs to be done between general and special education teachers to enhance communication and collaborative practices.
- Sensitivity training is a “must.”
- Some principals would like to better understand the allocation process/formula of instructional assistants across school sites.
- Some principals would like to learn what to look for when walking through and supporting special education teachers within their classrooms.

- Ancillary materials to support the core curriculum to the learning levels of special education students.
- Access to a concise organizational flowchart outlining the administrative/managerial staff oversight and responsibilities.
- More IEP meetings to be conducted utilizing effective “Collaborative IEP” components.
- If policies and/or procedures are restrictive or not working, then we need to advocate to change and/or revise while still maintaining adherence to legal mandates.

COMMUNICATION ACROSS DISTRICT OFFICE AND SCHOOL SITES

Monday meetings are held to include administrators, managerial staff, and program specialists from the Special Education and Pupil Services departments. The Assistant Superintendent also meets with this group to provide updates from Cabinet and provides direction as needed.

Also, there are regularly scheduled job-alike meetings are held for the job-alike groups listed below.

- Elementary Resource Specialist Teachers
- Elementary Mild to Moderate Special Day Class Teachers
- K-Adult Moderate to Severe Special Day Class Teachers
- Secondary Mild to Moderate Special Education Teachers*
- Psychologists
- Speech Pathologists
- Student Advisors*
- Nurses

*There is a Student Advisor at every middle and high school. They meet on a regular basis with special education teachers, disseminate information, and sometimes serve as the administrative designee at IEP meetings.

PARENT INPUT

PREFACE

A key component of this study included gathering input from parents of special education students. The following activities were conducted: (a) parent input session and follow-up phone interviews with several parents who were not in attendance at the input session; and. (b) distribution by mail and compilation of a *Special Education Parent Survey* to all parents of students receiving special education services with the District.

PARENT INPUT SESSION

A Parent Input Session was held in the evening of September 29, 2016. Two TSS Consultants met with approximately twelve participants including parents of special education students, students, a teacher, and an Inland Regional Center representative.

A one-page overview of the overall scope of the project was provided to each participant along with a brief verbal review of the project. The TSS Consultants shared the scope of Phase One (*Financial Audit*) and Phase Two (*Comparative Data and Analysis*). The discussion format was prompted by the questions listed below.

1. Please share the strengths of the Special Education programs and services in the District?
2. What would you change or add to make Special Education programs and services better?
3. Please talk about the level of interaction (including communication) that you have between the District Office and individual school sites.

Several parents shared numerous concerns about their individual challenges faced regarding issues such as due process proceedings (including attorney fees), settlement agreements, and independent evaluation requests, and nonpublic school staffing and services. There were indications that some site level administrators lacked sensitivity and ownership of children with disabilities and their families. Also, one representative indicated that Spanish-speaking families are not supported in their endeavors to meet as a group. Several parents of the Community Advisory Committee (CAC) participate as members of the Superintendent's Local Control and Accountability Plan (LCAP) Team. Parent presentations are included under the LCAP Goal 3, Action/Service 3.2b – Parent Workshops and Academies, specifically reprinted below.

“Community Advisory Committee: Provided 7 presentations this year on various topics for parents which included: advocacy, Dyslexia Simulation, Behavior intervention, and district services and programs. The first Special Needs Resource Fair was held on November 7, 2016 at Poly High with an attendance of 150 families. RCC (Riverside Community College) evening presentation at RCC for students and parents was held.”

Although, these services are available, parents, they indicated a need for help in order to navigate the system to ensure that their children are afforded appropriate services and to assist with difficult problems.

A TSS Consultant also called several parents upon the request of Board members to gather their input as well. The same discussion format was used as outlined above. Many of the same concerns identified above were shared. It was shared that we need to look at things with equity and compassion as interaction has been focused on special education policies and procedures without the human element. How can staff be more empathetic and understand the objective that parents are trying to achieve for their children.

PARENT SURVEY

The District mailed a 15-question *Special Education Parent Survey* (in English and Spanish) was mailed to the home address of every special education student enrolled in the RUSD with a stamped return envelope. To ensure confidentiality, the return envelopes were addressed to the Total School Solutions Office in Fairfield California. The *Special Education Parent Survey* is reprinted on the following page. It was categorized by four topic categories: (1) Communication; (2) When the school invited you to the Individualized Education Program (IEP) meeting; (3) As a participant during the IEP meeting; and, (4) Special Education Program.

**Riverside Unified School District
Special Education Parent Survey**

Dear Parent,

We thank you for responding to this survey as your input will help guide us to improve communication and services for special education students and families. We believe that this process needs to be a collaborative effort between parents and educators. For each statement below, please check one box using the rating scale of 1 to 4. You may skip any statement that you feel does not apply to your child.

	Strongly Disagree	Disagree	Agree	Strongly Agree
	1	2	3	4
Communication				
1. I am comfortable to call the school to ask questions or talk about my child's needs.				
2. My questions and concerns have been addressed satisfactorily.				
3. There is sensitivity to the needs of my child when I talk with the District or School.				
When the school invited you to the Individualized Education Program (IEP) meeting				
4. Parent/Teacher contacts were friendly.				
5. I understood the kind of meeting that I was invited to attend.				
6. I was given a convenient meeting date and time.				
7. I was given a copy of my rights and I understood them.				
As a participant during the IEP meeting . . .				
8. I was comfortable sharing my views and concerns or issues during the IEP meeting.				
9. The IEP team considered my child's strengths and needs.				
10. The team's decision regarding placement and services for my child was appropriate.				
11. I understood the goals that were written for my child.				
12. I believe the IEP we developed for my child will be successful.				
Special Education Program				
13. I have been kept informed of my child's progress this school year.				
14. I am pleased with the progress my child has made.				
15. My child is receiving the type(s) and amount of services currently listed on the IEP.				

There were a total of 330 completed surveys received. This represents slightly fewer than 10 percent, which is a typical response ratio for written surveys. Some of the items were left blank for each of the questions. The "no responses" were not used in calculating the percentages per rating on the scale.

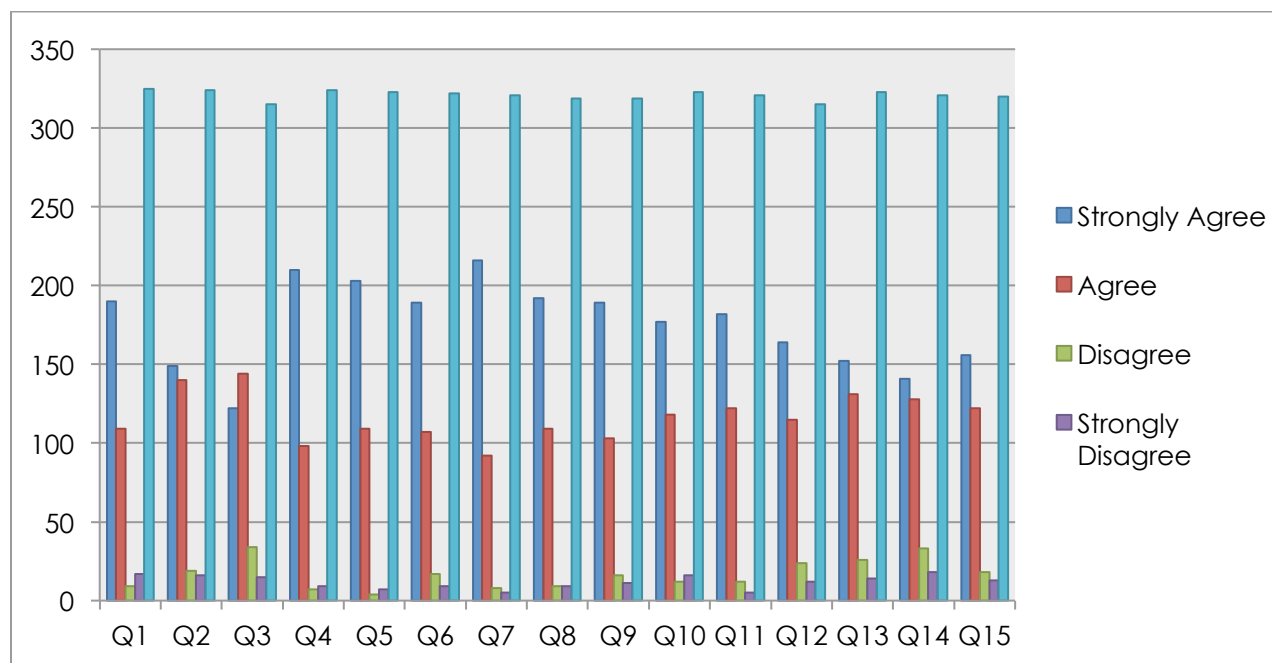
The number of responses for each of the 15 questions of the *Special Education Parent Survey* is provided in **Figure 58** based on a Likert scale from “strongly agree” to “strongly disagree.” Based on the results, the majority of the responses (from 84 to 97 percent) were in the categories of “strongly agree” and “agree.” The bar graph on the following page, clearly displays the positive responses.

There were approximately 30 surveys that included personal responses. Several comments were extremely positive, with phrases such as: “amazing” – “A+!!” – “I know my child is in good hands.” Several parents shared individual concerns regarding their child and asked that the District Special Education administrator contact them directly. A few comments indicated that as IEP meetings were in process of completion, those related sections on the survey could not be answered. On several surveys, parents added their new mailing addresses. All individual comments will be provided confidentially to the District under separate cover.

Figure 58 – Results of Special Education Parent Survey by Number of Responses

A	B	C	D	E	F
Question	Strongly Agree	Agree	Disagree	Strongly Disagree	Total
Q1	190	109	9	17	325
Q2	149	140	19	16	324
Q3	122	144	34	15	315
Q4	210	98	7	9	324
Q5	203	109	4	7	323
Q6	189	107	17	9	322
Q7	216	92	8	5	321
Q8	192	109	9	9	319
Q9	189	103	16	11	319
Q10	177	118	12	16	323
Q11	182	122	12	5	321
Q12	164	115	24	12	315
Q13	152	131	26	14	323
Q14	141	128	33	18	321
Q15	156	122	18	13	320

Parent Survey Rating Results by NUMBER of Responses for the Fifteen Questions

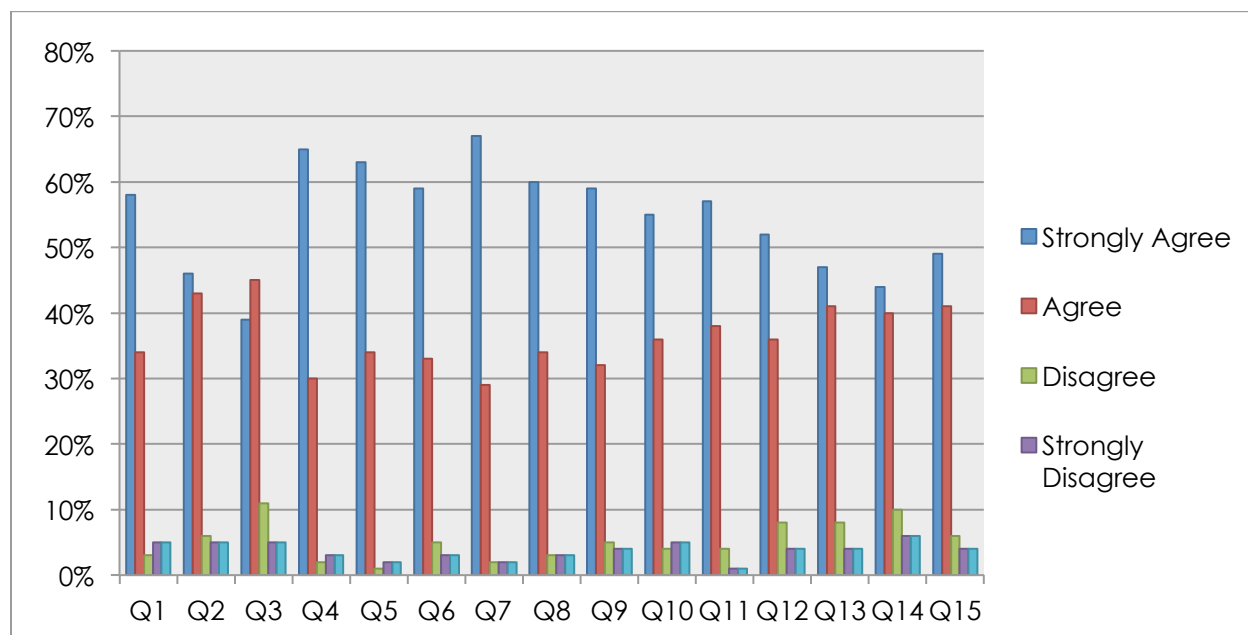


As shown in **Figure 59**, the results of the *Special Education Parent Survey* are provided by percentage of each question by the 4-scale ratings. The bar graph following this table, clearly displays that the majority of the responses are clustered in Column B (“strongly agree”) and Column C (“agree”).

Figure 59 – Results of Special Education Parent Survey by Percentage of Responses

A	B	C	D	E	F	G
Question	Total	Strongly Agree	Agree	Disagree	Strongly Disagree	Total
Q1	325	58%	34%	3%	5%	100%
Q2	324	46%	43%	6%	5%	100%
Q3	315	39%	45%	11%	5%	100%
Q4	324	65%	30%	2%	3%	100%
Q5	323	63%	34%	1%	2%	100%
Q6	322	59%	33%	5%	3%	100%
Q7	321	67%	29%	2%	2%	100%
Q8	319	60%	34%	3%	3%	100%
Q9	319	59%	32%	5%	4%	100%
Q10	323	55%	36%	4%	5%	100%
Q11	321	57%	38%	4%	1%	100%
Q12	315	52%	36%	8%	4%	100%
Q13	323	47%	41%	8%	4%	100%
Q14	321	44%	40%	10%	6%	100%
Q15	320	49%	41%	6%	4%	100%

Parent Survey Rating Results by PERCENTAGE of Responses for the Fifteen Questions



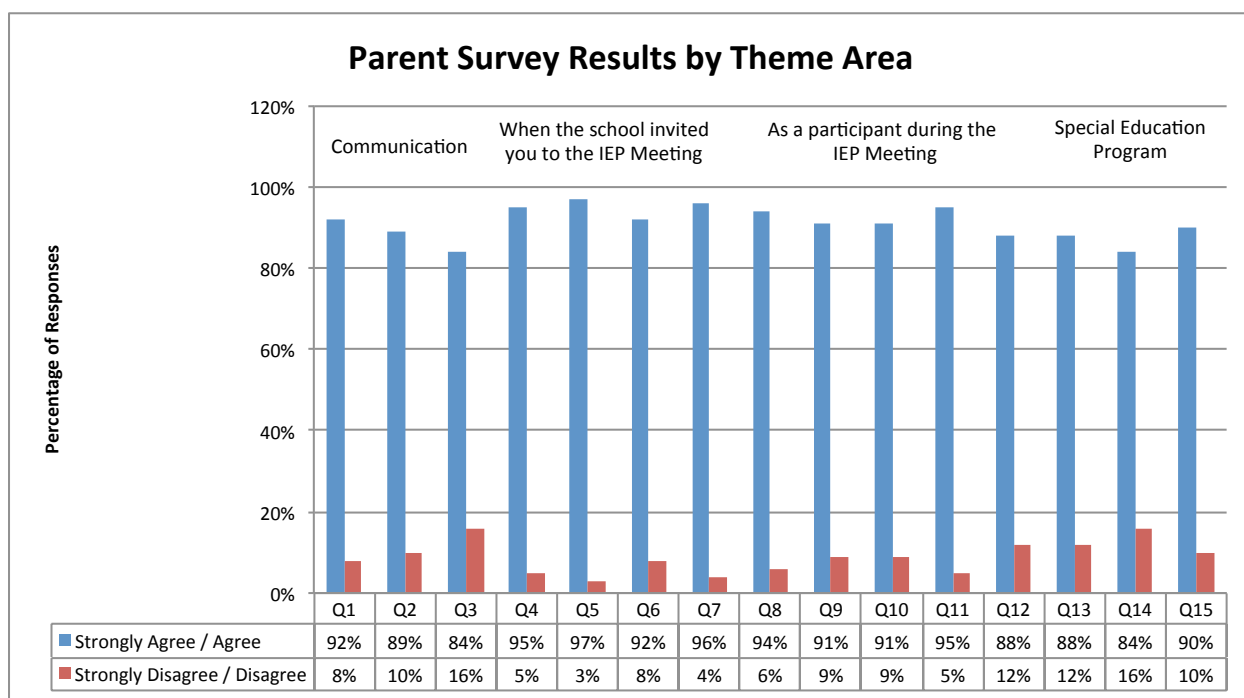
As shown in **Figure 60**, the responses to the survey questions were aggregated by the four topic categories. The bar graph following page displays that the majority of the responses are clustered in Column B (“strongly agree”) and Column C (“agree”).

Figure 60 – Results of Special Education Parent Survey by Percentage of Responses by Theme Area

A	B	C
Question	Agree Strongly Agree	Disagree Strongly Disagree
Communication		
Q1	92%	8%
Q2	89%	10%
Q3	84%	16%
When the school invited you to the Individualized Education Program (IEP) Meeting . . .		
Q4	95%	5%
Q5	97%	3%
Q6	92%	8%
Q7	96%	4%
As a participant during IEP Meeting		
Q8	94%	6%
Q9	91%	9%
Q10	91%	9%
Q11	95%	5%
Q12	88%	12%

Figure 60 – Results of Special Education Parent Survey by Percentage of Responses by Theme Area, continued

A	B	C
Question	Agree Strongly Agree	Disagree Strongly Disagree
Special Education Program		
Q13	88%	12%
Q14	84%	15%
Q15	90%	10%



INFORMAL DISPUTE RESOLUTION

Special education, governed by federal and state statute and regulations, can become complicated and process-driven. It is important that parents do not feel alone throughout this process. Some parents may need additional outreach with more empathy.

The RUSD has made available an “Informal Dispute Resolution (IDR) process for parents and District administration to work together to resolve outstanding issues, concerns, or disagreements about their children’s special education program and services.

“Notice of Procedural Safeguards and Parents’ Rights” are posted on the RUSD website under the tab “Special Education” “Parents Rights.” The IDR process is outlined under these rights as follows:

Informal Dispute Resolution or “IDR” is a voluntary, optional dispute resolution process available to parents. IDR is a District process that is designed to be faster, less formal and less adversarial than mediation and due process proceedings. In the IDR process, parents identify their issues and concerns and the District attempts to work with the parent to quickly resolve the issues identified.

If you want to use the IDR process to resolve a disagreement regarding your child’s IEP, ask for a meeting with the IEP administrator/designee to discuss your issues and concerns in more detail.

The meeting with the IEP administrator/designee should take place after the IEP team meeting is completed. During the meeting you will work with the IEP administrator/designee to complete the form entitled “A Request for Informal Dispute Resolution (IDR)– IDR Form A.” After IDR Form A is completed, it is submitted to the District’s Special Education Department. Within a few business days you will be contacted by a District administrator to schedule a meeting to discuss a resolution of the disagreement.

You will be provided with documentation of the resolution activity during the IDR process. If an agreement is reached during the IDR process, the terms of the agreement may be put into writing. If an agreement is not reached, you may initiate due process proceedings.

During interview with parents, it was shared that many parents may not know about the IDR process as it is embedded within “Notice of Procedural Safeguards and Parents’ Rights.” However, the Parents’ Rights document is provided to parents, at a minimum of annually, to include but not limited to: (a) referring for special education services; (b) making any changes in a child’s identification, assessment, or educational placement; (c) providing consent for assessment or change in services; (d) participating in the IEP process; and, (e) other matters relating to their child’s free appropriate public education (FAPE).

The RUSD has available three District-level administrators, highly trained in alternative dispute resolution, to work together with parents in resolving educational disputes through the IDR process prior to filing for a formal due process hearing or filing a state compliance complaint regarding the issue(s) in dispute. However, there are times that the District and parents are unable to resolve concerns through this informal proceeding.

From the input gathered through the interview process with parents and educators, the TSS Consultants were initially suggesting to have the District contract with one or more parents on a part-time basis to serve as a resource to parents of students with disabilities. This would not be considered an advocate-type role or special education ombudsman, in which, the person assists in the resolution of concerns and issues. Rather, a resource parent would assist parents navigate through the IEP process as well as serve as a liaison between the parent and district/school, considering the interests and rights of all parties who might be involved in non-legal issues. However, it may be difficult to separate the legal and non-legal issues when parents are seeking help from a person without the authority or capacity of resolving outstanding issues.

OTHER COMPONENTS

Several areas were identified that support and/or supplement the study this special education review. These would involve professional development, logistics, and or organizational components.

PROFESSIONAL DEVELOPMENT

Extensive professional development (PD) opportunities are available to certificated and classified special education staff coordinated through the Special Education Department and Instructional Services Department. Highlights are listed below.

- There is a full-time staff developer dedicated to Special Education Department who is co-funded with general and special education dollars.
- The “RUSD Special Education Online Professional Development Courses Self-Paced 2016-17” is available on the District website for staff to self-enroll and choose from a comprehensive directory of topics.
- Comprehensive “Professional Development Trainings 2016-17” Calendar is available for Special Education and Pupil Services Departments that includes a myriad of training opportunities for teachers and instructional assistants. Additional courses are added or changes during the school year based on needs, substitute availability, etc. (Note: Instructional Assistants are invited and attend training designed for certificated staff if appropriate.)
- Individual support/coaching in the classroom for both special education teachers and paraprofessional.
- Region 10, comprised of SELPAs within the Inland Empire, sponsors a variety of specialized learning opportunities to continually increase the capacity of special educators to meet the diverse learning needs of special education students. Region 10 also coordinates professional learning groups and committees that meet throughout the school year to receive specialized training, develop procedures, and engage in collegial learning in specific areas, such as psychological or mental health services, speech and language development, autism, etc.). The District is actively involved on Region 10 committees, participate in the learning groups, and/or attend regional workshops.
- Special Education department managers and the majority of middle and high school Student Advisors have been trained in Alternative dispute resolution (ADR).
- The District features Haiku sites for SST, MTSS, and Special Education. These Haiku sites have multiple resources and information.
- Parent special education trainings are held monthly based on results of surveys (sent home with students to parents of special education students each spring).
- Common Core Staff Development provided to special education teachers over the last two years through Secondary Education to ensure that teachers were receiving the same content information as their general education colleagues. Time was allotted during these sessions for special education collaboration.
- Planning time has been made available for general and special education collaboration during District-sponsored release days.
- Special education teachers have built capacity of learning through technology as listed below.

- Teachers are provided resources on how to navigate Haiku (aka–Power Learning) and also how to set up their own class.
- Teachers have access to District technology staff developers
- Teachers participate in walking through a specific Haiku course if it is related to a content training. For example, the in secondary Introduction to Literature training, teachers were shown how to navigate Haiku during their English Language Arts training since all related resources are on the Haiku site.

INCLUSION OF STUDENTS WITH DISABILITIES IN THE LCAP

Throughout the Local Control and Accountability Plan (LCAP), students with disabilities were listed under “Other Subgroups” to be served within many of the identified scope of services. In the Annual Update for LCAP GOAL 3: Fully engage student parents and the community in support of short and long term educational outcome, specific updates were provided for special education as reprinted below.

Action/Service 3.2c – Workshops and Academies

“Special Education: Parent tour of adult programs annually in spring to assist in transition of students from school to adult life \$141,658 LCFF 90 Community Advisory Committee: Provided 7 presentations this year on various topics for parents which included: advocacy, Dyslexia Simulation, Behavior intervention, and district services and programs. The first Special Needs Resource Fair was held on November 7, 2016 at Poly High with an attendance of 150 families. RCC evening presentation at RCC for students and parents was held.”

Action/Service 3.2d – Translation Services

“Translators have been working to support interpreting for IEP meetings and translations throughout the year. Currently we have 20 site translators serving 26 school sites, 6 of them each serving 2 sites. The translator training that is provided is meant to create consistency in language use and to promote continued quality of translation services. Training was provided . . .” (numerous dates listed).”

”In 2015-2016, 3 additional translators have been authorized to translate IEP documents. A total of 20 percent of the translators are currently authorized to translate IEP documents for their school site. It is our goal to increase this by at least 20 percent each year, by providing individual training in the summer months until every one of them is authorized to translate the IEP’s for their school site.”

The inclusion of students with disabilities in many of the LCAP’s actions/services is commendable.

SPECIAL EDUCATION HANDBOOK

As referenced earlier, the District has a Haiku site (employee portal) with a comprehensive training opportunities (including an online course directory), resources, and chat rooms for job-alike groups to exchange information among colleagues. Also, the Special Education Services Department features a *PowerSchool Learning*: “Procedures” link that includes the following tabs: Announcements and Department Information; Forms & Documents; Frequently Asked Questions; Laws; Memos; Procedures; Resources; SIRAS; Special Education Instructional Assistants; Training; and Transition.

During the meetings with special education teachers and related service providers, there were numerous requests for an electronic version of a Special Education Procedural Handbook. Although training on usage of Haiku modules and specific web sites are easily accessible and user-friendly, staff expressed interest in having the policies and procedures in one document.

ORGANIZATIONAL CHART

The Pupil Services/SELPA Department has several helpful lists of “Managers & Support Staff” by name of staff member, title, phone extension, and areas of responsibility. The Special Education Department is in the process of finalizing a separate list of administrative positions by title, and designation of staff supervised by each of those administrators.

PHASE THREE: FINDINGS

FINDINGS

Staffing Levels And Patterns

- There have been notable increases in special education teachers; mostly a result of adding classes pursuant to the special education class size language in the Agreement for Certificated Bargaining Unit (“Agreement”). Also, one new Transitional Kindergarten (TK) class and two new preschool classes were opened.
- There have been notable increases in instructional assistants; mostly a result of adding classes pursuant to the special education class size language in the Agreement. Also, Intensive Behavior Interventions Assistants were added and a number of assistants may have been increased due to students entering the District with aides included on their IEPs.
- Although the Special Education Department has an allocation formula to assign instructional assistants to each school site based on the number of special education classes and adherence to the special education class size language in the Agreement, it appears that a system is not in place to monitor on a regular basis, the actual number of aide hours at each school site in order to determine if a current employee is available to fill immediate vacancies and/or assist with assigning specific special circumstances for individual students.
- The Special Education Department recently adopted a formal process and protocol when determining the need for special circumstance instructional assistants for individual students. Training has been provided to principals and other school site administrators.
- The District is cognizant of mandated state staffing caseloads (e.g., Resource Specialists and Speech and Language Pathologists) and actively recruits to adhere to these statutes and/or contracts with nonpublic agencies to fill the vacancies.
- The Special Education Department and Human Resources has actively recruited for positions to build capacity within its own programs (e.g., Occupational Therapists, Intervention Specialists).
- The Early Childhood Assessment Team (ECAT), comprised of psychologists, speech pathologists, as well as a nurse, occupational therapist, or other related service provider(s) as needed, is a time-consuming process and involved approximately 200 assessments last year for determination of eligibility for special education services at the preschool level. It appears that there is adequate staffing to complete these assessments. However, the nursing staff indicated a need for additional time to participate fully in the ECAT process.
- There appears to be inadequate support to school sites with only six full-time Program Specialists. Their assignments were restructured this school year so that each Program

Specialist serves specific number of schools along with having other specialty responsibilities based on their expertise.

Special Education Program Delivery Systems

- Adoption of evidence-based curriculum and expansion of course offerings have provided special education students more access to the core curriculum.
- The District provides a comprehensive continuum of programs for special education students across the school sites, including an alternative campus.
- It appears that there are limited “push-in” or integration models at the secondary level. Integration models would include having the majority of services provided in general education classes with the support from special education teachers and other related service providers.
- The District did not meet its state-imposed targets for Indicator 5A and 5B–Least Restrictive Environment. The 5C target was met in 2013-14, but not 2014-15. Indicator 5 measures the average amount of time special education pupils, between the ages of 6 through 21, receive their services in settings apart from peers without disabilities.
- The District did not meet its Indicator 6–Preschool Least Restrictive Environment for 2013-14 and 2014-15. Indicator 6 measures the percent of children ages 3 through 5 with IEPs attending regular early childhood program and receiving a majority of special education and related services in the regular program or, in a separate special education class, separate school or residential facility.
- Intensive behavioral intervention supports and psychological services are provided for students with social-emotional needs, including global implementation of Boys Town curriculum and interventions across all classes designed for students with emotional and behavioral disorders.
- The Student Assistance Program (SAP) was repeatedly cited during the stakeholder meetings as a critical resource for special education students, especially in the area of social and emotional support personnel to provide Positive Behavioral Interventions and Supports (PBIS).
- District personnel, who provide related services in the areas of adapted physical education, speech therapy, and occupational therapy, work collaboratively within each of their special areas. There specific challenges that face each of these areas, which are addressed separately in the full report and in the recommendation section below.

Multi-Tiered System of Supports

- Some of the teaching staff did not know the distinction between RtI and MTSS; however, it appears that numerous educators were providing levels of support within the context of RtI and/or MTSS.

- The District has a clear understanding of a MTSS framework and has implemented elements of MTSS initiated this school year. Considerable district-wide planning has occurred through the Curriculum and Instruction Department, and a MTSS Specialist has been employed. Special Education Department representatives have been included in this process and attend monthly focus meetings.
- All components of the Student Success Team (SST) intervention process have been integrated within a MTSS and RtI structure to include detailed procedures, forms, and professional development. However, the SST process is not being implemented consistently across all school sites.

Stakeholder Input

- District personnel who participated in the three-day stakeholder meetings were professional and open in sharing their concerns as well as providing constructive ideas for improvement. There were many positive comments shared during the discussions and it was evident that the members of each job-alike group respect one another and collaborate to do what's best for their students.
- It was clear during the personal discussions with the special education teachers and related service providers that they are dedicated, hardworking, and are interested in looking at different service delivery models to promote maximum student learning as well as more inclusion into general education settings.
- All staff members interviewed believed that there is good communication from the District Office to the school sites and educators are afforded many opportunities for professional development.

Parent Input

- Based on the results of a *Special Education Parent Survey*, the majority of the responses (from 84 to 97 percent) were in the categories of “strongly agree” and “agree.” A few parents noted individual concerns on their surveys.
- During a parent input session, with approximately twelve participants and several follow-up phone calls made by the TSS Consultant, individual parent and student challenges were raised. The concerns and challenges will be provided confidentially to Special Education District administrators for follow-up.

PHASE THREE: RECOMMENDATIONS

STAFFING LEVELS AND PATTERNS

Instructional Assistants

- Based on the experience of the TSS Consultants, when oversight of instructional assistants is assigned to one person, the main focus becomes to reduce aide costs. When this oversight becomes an adjunct responsibility for managers, there is limited concentration on overall cost savings and the various managers may not understand or be aware of the full picture of shortages and/or excess of aide hours at each school site. Also re-deployment opportunities of aides or hours may not be readily available to someone who does not have all the district-wide information. It is recommended that the District assign the oversight of paraprofessionals to a single staff member, specifically a full-time classified employee (e.g., secretarial or administrative assistant) who is supervised by a special education manager. This would allow for the decision maker to be aware of availability and opportunities district-wide for more efficient staffing and possible cost savings.
- Upon suggestion of the TSS Consultant, the District has ordered the *Special Circumstance Independence Assessment (SCIA)* recently revised by a consortium of districts from the North Inland SELPA. The SCIA manual provides guidelines for incorporating Special Circumstance support into the student's IEP and Behavior Intervention Plan, if needed. This manual could supplement the District's recently adopted a formal process and protocol.

Occupational Therapists

- Continue to pursue hiring 1.00 full-time Occupational Therapist Registered (OTR) as a District employee.
- A cost analysis of District-employed as compared to OTR contracted personnel is warranted. The RUSD would generate LEA Medi-Cal reimbursement for District-employed OTRs.

Itinerant Teachers For Visually Impairment Program

- Consider reaching out to other local educational agencies (e.g., Orange County Department of Education – Special Education Services, Assistive Technology Department) for customized advanced training on the newest computer systems or software, and testing strategies for the blind via web-based applications.

Nursing Services at the Preschool Level

- Conduct a time study of the nursing staff assigned to the Sunshine Preschool Program and satellite sites to determine the full time equivalency needed for additional allocation of nurse's time and/or hours.

- Determine the LEA Medi-Cal reimbursement available for hearing and vision screenings that could offset the cost of additional nursing hours required to ensure that hearing and vision screenings are conducted.

Program Specialists

- Based on comparative information, it is recommended that the District add 2.00 full time equivalent (FTE) program specialists.
- The roles and responsibilities of program specialists should be analyzed at the end of the school year, to ascertain how the program specialist services could focus more on those services outlined in California Education Code § 56368(b).

SPECIAL EDUCATION PROGRAM DELIVERY SYSTEMS

Service Delivery – Least Restrictive Environment

- Not meeting state-imposed measurements for least restrictive environment could trigger significant disproportionality. It is recommended to formally assess school practices across the District. A user-friendly tool, *Assessment of School Practices Related to Inclusive Education, A Needs Assessment and Planning Tool*, is available on-line by Stetson and Associates, Inc. 2015.
- Based on this self-assessment, a draft scope and sequence for inclusive practices could be developed by an interested group of administrators and teachers. The scope could include, but not limited to: (1) defining a structure for inclusive planning; (2) reviewing, revising, and/or developing related policies and procedures; (3) identifying funding sources for inclusive implementation; (4) compile and analyze data, review placement patterns, and monitor IEP related to the percentage of special education pupils receiving services in general education settings; (4) establish a multi-year professional development plan to provide ongoing support based on the identified needs of the *Planning Tool*.

Psychological Services

- Change the practice on how school psychologists report counseling and guidance, psychological services, and/or behavior intervention on the student's IEP so that these services are coded as a 500 category related to be Educationally Related Mental Health Services (ERMHS).
- Address practice referenced above as a priority with school psychologists in order to better reflect the amount of services a student is actually receiving.
- Coordinate the implementation of Positive Behavior System of Support through the Student Assistance Program with the Special Education Psychological Services.

Adapted Physical Education Services

- Validate if pupils have adapted physical education (APE) goals outlined in their IEPs when they receive “specially designed” services in a separate class conducted by the APE teacher.
- The District may want to adopt an APE referral process. Prior to referring students for initial evaluation, modifications and interventions would occur and documented by the general education physical education and/or special education teacher. If after a reasonable amount of time (approximately six weeks), modifications have not been successful with interventions documented, the referral for an initial evaluation for APE services could be enacted.

Occupational And Physical Therapy

- At the beginning of school year, implement district training for general and special education staff as to the qualifications for occupational therapy services. At these trainings, review interventions and provide resources/handouts for general and special education staff for use prior to making referrals for testing. This might include sensory integration and executive functioning in the classroom.
- Revisit the *Guidelines for Occupational Therapy and Physical Therapy in California Public Schools*, California Department of Education (Second Edition 2012), which includes the role of educational services. Including this information in the assessments will communicate and delineate the role of school-based therapy to parents. Also including standardized testing results in initial and triennial assessments will allow for greater data to support a therapist’s recommendation to decrease or exit services.
- School-based goals for occupational and physical therapy services are required on the IEP. Consider reviewing the IEPs of students receiving therapy services from a nonpublic agency (NPA) to ascertain if the goals are school-based.

Language And Speech Services

- Parents are asked to complete the form, “Permission to Enroll in the Speech Intervention Program (SIP),” to consent for their children to participate in the program. Consider adding to this form a beginning and ending date as well as add the word “monitoring” to the phrase “progress updates.”
- Analyze the language development curriculum in all SDC and preschool programs, to ensure that as many language needs that do not require specific therapy can be addressed in those classrooms. Service delivery for different needs of students varies (e.g., preschoolers with autism have different needs than teenagers with intellectual disabilities). Explore curriculum supports provided to pupils with language needs to ensure that language development is supported in the general and special education classrooms.
- An area of warranted analysis would involve reviewing the most efficient and cost effective way of providing language and speech development and remediation. The more

pupils identified for services, the greater number of SLPs required. At a state-mandated average caseload per pathologist of an average of 55 for K-12 pupils and 40 for preschool, the cost of this related service is clearly fixed to the District's pay scale for fulltime employees and/or contracted rates. Possibly look at each school site and compare the number of identified students requiring speech and language remediation and determine if some sites are higher than others and discuss possible reasons for these anomalies.

- The latest Third Edition 2016 of the "Communication Severity Scales" (CSS) focuses on the RtI/MTSS education model for early intervention and considers a student's total school experience and other educational needs. The CSS includes *Speech and Language Service Guidelines*, which can be used for IEP teams when determining frequency and duration of language and speech services, as well as dismissal criteria.
- Potential area of review could include developing a system to track and monitor data related to how and when EL students are being identified for special education services.

Preschool Program

- Consider visiting other model school districts to continue to build skills and best practices in providing services to preschool students in the least restrictive environments. The TSS Consultant can provide the names of those districts up request.

Nursing Services at the Preschool Level

- Develop a process in that hearing and vision screenings are conducted for all pupils of preschool age who are being evaluated for special education eligibility. Possibly conduct a job analysis and/or time study to determine the need for additional health services staffing to ensure that these screenings are conducted.
- Provide professional development for teachers regarding health literacy and health issues related to the population they are serving.

MULTI-TIERED SYSTEM OF SUPPORTS

Student Success Team

- Although an excellent Student Success Team-Multi-Tiered System of Supports (SST-MTSS) intervention process is in place, it appears that this process is not implemented consistently across all school sites based on input from the Stakeholder meetings. At leadership meetings, principals could share best practices that they have implemented regarding the SST-MTSS intervention process.
- Identify those school sites not utilizing the SST-MTSS intervention process consistently and provide additional support to assist in the implementation process.

STAKEHOLDER INPUT

District Personnel Input At Stakeholder Meetings

- District personnel, who participated in the visitation meetings with the TSS Consultants, provided very thoughtful and constructive ideas for improvement. Special Education Department administrators should further discuss the summary points included under the section, *Changes or Additions to Improve Special Education Programs and Services*, in the full report. Many of the suggestions provided at the Stakeholder Input sessions were addressed in other sections of the full report.

PARENT INPUT

- The majority of the responses from the *Special Education Parent Survey* were positive. A few parents noted individual concerns on their surveys. At the Parent Input session and during follow-up phone calls made by the TSS Consultant, individual parent and student challenges were raised. These concerns and challenges will be provided confidentially to Special Education District administrators to address. Parent input will be considered when developing the Special Education Strategic Action Plan. Also, under the Professional Development recommendations, additional training is suggested to assist parents in a sensitive and effective manner.

INFORMAL DISPUTE RESOLUTION

- Although the Informal Dispute Resolution (IDR) Process is included as part of the “Notice of Procedural Safeguards and Parents’ Rights” as posted on the RUSD website, it may be helpful to highlight the IDR as a separate tab under “Special Education.”
- Consider expanding the IDR process to include several phases. The first phase would involve trained District administrators facilitating the IDR, which is currently available in RUSD. If outstanding issues continue, then a neutral specialist, such as a retired judge, would conduct a resolution meeting. The specialist would not be a “contract employee” and would act as a neutral third party in a secure environment as possible that facilitates the informal resolution of educational disputes. The two phases would need to be clearly outlined, with the expanded phase to be free of charge for parents. Samples of these procedures will be made available to the District under separate cover.

OTHER COMPONENTS

Several areas were identified that support and/or supplement the study this special education review. These would involve professional development, logistics, and or organizational components.

Professional Development

The District is commended for its extensive professional development made available to educators and parents. Additional and/or enhanced areas of support are listed below for consideration.

- How to support families with children with disabilities to navigate through the complicated field of special education, starting with the identification for eligibility through the provision of special education services.
- What does a principal or administrative designee need to know about special education law and how to address school issues that may not be part of the IEP process? A helpful publication is: *A Principal's Guide to Special Education*, Third Edition, written by David F. Bateman and C. Fred Bateman, published by Council for Exceptional Children. Some of the focus areas to be considered are listed below.
 - How to fully integrate special education students into the school culture with the same school protocols, policies, and procedures as the entire student body.
 - How to distinguish between school-related issues or concerns that could be addressed outside of the IEP process.
- Provide the following professional development for all principals and their administrative designees: (Note: some of these staff members may have already participated in this training.)
 - Dispute resolution and collaborative IEP strategies;
 - Understanding of special education law training; and,
 - Collaborative IEP process provided by legal firms.

Special Education Handbook

- Special Education Department is in the process of finalizing a Psychological Services Procedural Handbook that includes a clear mission statement and goals tied to the guiding LCAP principles, SELPA responsibilities, referral process, forms, and special education eligibility. As this Handbook addresses a broader scope, it could be expanded to fill the identified need for a Special Education Handbook.

Organizational Chart

- It would be helpful to have a one-page organizational chart for the Special Education/SELPA Department.

ACRONYM LIST

AB	Assembly Bill
ABA	Applied Behavior Analysis
ADA	Average Daily Attendance
ADHD	Attention Deficit Hyperactivity Disorder
APE	Adapted Physical Education
AR	Administrative Regulation
ARRA	American Recovery and Reinvestment Act
AT	Adaptive Technology
API	Academic Performance Indicator
AUT	Autism
BCBA	Board Certified Behavior Analyst
CAC	Community Advisory Committee
CSDR	California School for the Deaf, Riverside
CALPADS	California Longitudinal Pupil Achievement Data System
CASEMIS	California Special Education Management Information System
CBEDS	California Basic Education Data System
CCR	California Code of Regulations
CDE	California Department of Education
CEIS	Coordinated Early Intervening Services
CFR	Code of Federal Regulations
COE	County Office of Education
CSDR	California School for the Deaf
CSS	Communication Severity Scales
CTE	Career Technical Education
DB	Deaf-Blind
DEA	Deaf
DIBELS	Dynamic Indicators of Basic Early Literacy Skills
DIS	Designated Instruction and Services
DOC	District of Choice
DOR	District of Residence
DOS	District of Service
DRDP	Desired Results Developmental Profile
EC §	Education Code Section
ED	Emotional Disturbance
ECAT	Early Childhood Assessment Team
EHA	Education for All Handicapped Children Act (Public Law 101-476) Amended in 1990 and title changed to IDEA
EIS	Early Intervening Services
ELL	English Language Learners
ELA	English Language Arts
ERMHS	Educationally Related Mental Health Services
ESEA	Elementary and Secondary Education Act
FAPE	Free Appropriate Public Education
FTE	Full Time Equivalent
FY; FYY	Fiscal Year: Federal Fiscal Years
GC	Government Code

HH	Hard of Hearing
ID	Intellectual Disability (former term: Mental Retardation – MR)
IDR	Informal Dispute Resolution
IDEA	Individuals with Disabilities Education Act of 2004 (Public Law 94-142)
IEP	Individualized Education Program
IMS	Instructional Media Services (Assistants)
ITP	Individualized Transition Program
ISA	Individual Service Agreement
ISP	Identified Student Percentage (ISP)
IWENS	Individuals with Exceptional Needs
LCAP	Local Control and Accountability Plan
LCFF	Local Control Funding Formula
LEA	Local Educational Agency
LI	Low Incidence
LRE	Least Restrictive Environment
LSH	Language, Speech, and Hearing Specialist
MAA	Medi-Cal Administrative Activities
MD	Multiple Disability
Medi-Cal	California Medical Assistance Program
MOE	Maintenance of Effort
M/M	Mild to Moderate
M/S	Moderate to Severe (disabilities)
MTSS	Multi-Tiered System of Supports
NASP	National Association of School Psychologists
NCLB	No Child Left Behind Act
NPA	Nonpublic Agency
NPS	Nonpublic School
OHI	Other Health Impairment
OI	Orthopedic Impairment
O & M	Orientation and Mobility
OT/OTR	Occupational Therapy/ Occupational Therapist Registered
P1	First Principal
P2	Second Principal
PBIS	Positive Behavioral Interventions and Supports
PCRA	Program Cost Report Allocations
PD	Professional Development
PE	Physical Education
PENT	Positive Environments, Network of Trainers
PERS	Public Employees' Retirement System
PT	Physical Therapy
RCC	Riverside Community College
RCTA	Riverside City Teachers Association
RSP	Resource Specialist Program
RtI	Response to Intervention
RUSD	Riverside Unified School District
SACS	Standardized Accounting Code Structure
SAI	Specialized Academic Instruction

SAP	Student Assistance Program
SCIA	Special Circumstance Independence Assessment (SCIA)
SDC	Special Day Class
SED	Special Education Division
SELPA	Special Education Local Plan Area
SEMA	Special Education Actual to Actual (SEMOE Report)
SEMB	Special Education Budget to Actual (SEMOE Report)
SEMOE	Special Education Maintenance of Effort
SIP	Speech Intervention Program
SLD	Specific Learning Disability
SLI	Speech or Language Impairment
SLP	Speech Language Pathologist
SLPA	Speech Language Pathology Assistant
SFS	Strategies for Success
SPED	Special Education
SPP	State Performance Plan
SPPI	State Performance Plan Indicators
SST	Student Success Team
SUMS	Scale-Up MTSS Statewide (California Initiative)
TBI	Traumatic Brain Injury
TEAM	Transition Education Adjustment Model
TK	Transitional Kindergarten
TOSA	Teacher on Special Assignment
TSS	Total School Solutions
UDL	Universal Design for Learning
UPC	Unduplicated Pupil Count
USC	United States Code
VI	Visual Impairment

ATTACHMENT ONE

Click for Details	SACS Resource Code	'Friendly' Title for Standardized Account Structure (SACS)	SACS Revenue Object
Details	3310	Special Education: IDEA Basic Local Assistance Entitlement, Part B, Section 611 (Formerly PL 94-142)	8181
Details	3311	Special Education: IDEA Local Assistance, Part B, Sec 611, Private School ISPs	8181
Details	3312	Special Education: IDEA Local Assistance, Part B, Sec 611, Early Intervening Services	8990
Details	3313	Special Ed: ARRA IDEA Part B, Sec 611, Basic Local Assistance (NO LONGER FUNDED)	8181
Details	3314	Special Ed: ARRA IDEA Part B, Sec 611, Local Assistance Private School ISPs (NO LONGER FUNDED)	8181
Details	3315	Special Ed: IDEA Preschool Grants, Part B, Section 619 (Age 3-4-5)	8182
Details	3316	Special Ed: IDEA Preschool Accountability Grants, Part B, Sec 619	8182
Details	3318	Special Ed: IDEA Part B, Sec 619, Preschool Grants Early Intervening Services	8990
Details	3319	Special Ed: ARRA IDEA Part B, Sec 619, Preschool Grants (NO LONGER FUNDED)	8182
Details	3320	Special Ed: IDEA Preschool Local Entitlement, Part B, Section 611 (AGE 3-4-5)	8182
Details	3322	Special Ed: ARRA IDEA Part B, Sec 611, Local Assistance Early Intervening Services (NO LONGER FUNDED)	8990
Details	3324	Special Ed: ARRA IDEA Part B, Sec 611, Preschool Local Entitlement (NO LONGER FUNDED)	8182
Details	3326	Special Education: IDEA Preschool Capacity Building, Part B, Sec 619	8182
Details	3327	Special Ed: IDEA Mental Health Services, Part B, Sec 611	8182
Details	3327	Special Ed: IDEA Mental Health Average Daily Attendance (ADA) Allocation, Part B, Sec 611	8182
Details	3329	Special Ed: ARRA IDEA Part B, Sec 619, Preschool Grants Early Intervening Services (NO LONGER FUNDED)	8990
Details	3332	Special Ed: IDEA Part B, Sec 611, Preschool Local Entitlement Early Intervening Services	8990
Details	3334	Special Ed: ARRA IDEA Part B, Sec 611, Preschool Local Entitlement Early	8990

		Intervening Services	
Details	3345	Special Ed: IDEA Preschool Staff Development, Part B, Sec 619	8182
Details	3372	Special Ed: State Improvement Grant, Improving Special Ed Systems	8182
Details	3372	Special Ed: State Improvement Grant, Improving Special Ed Systems	8182
Details	3385	Special Ed: IDEA Early Intervention Grants, Part C	8182
Details	3385	Special Education: Early Intervention Grants	8590
Details	3386	Special Ed: Supporting Inclusive Practices	8182
Details	3395	Special Ed: Alternate Dispute Resolution, Part B, Sec 611	8182

Click for Details	SACS Resource Code	'Friendly' Title	SACS Revenue Object
Details	6500	Special Education Apportionment	8311
Details	6500	Special Education - Reappropriation (Proposition 98)	8311
Details	6500	Special Education: Reappropriation	8311
Details	6501	Special Ed: Local Assistance Grant (Ages 5-21)	8590
Details	6510	Special Ed: Early Ed Program for Individuals with Exceptional Needs (Infant Program)	8311
Details	6512	Special Ed: Mental Health Services	8590
Details	6513	Special Ed: State Preschool Grant (Ages 3-4-5) (NO LONGER FUNDED)	8590
Details	6515	Special Ed: Infant Discretionary Funds, Early Ed Individuals with Exceptional Needs (Infant Program)	8590
Details	6520	Special Ed: Project Workability I LEA (Formerly Resource 3405)	8590
Details	6520	Special Ed: Project Workability I LEA	8590
Details	6525	Special Ed: Cross-Cultural Assessments, Special Project Special Studies (NO LONGER FUNDED)	8590
Details	6530	Special Ed: Low Incidence Entitlement (NO LONGER FUNDED)	8590
Details	6535	Special Ed: Personnel Staff Development (NO LONGER FUNDED)	8590
Details	6540	Special Ed: State Staff Development	8590

Sources: CDE Website, "SACS Resource Spreadsheets"

<http://www.cde.ca.gov/fg/ac/ac/resource.asp>