

FCMAT

FISCAL CRISIS & MANAGEMENT
ASSISTANCE TEAM

Special Education Review

July 25, 2024

Budget

Amount	Details	Month	Amount
4,500	Mid Year Bonus	June	2,000
2,500	Year End Bonus	December	3,000
		January	5,000

Costs	Month	Amount
2,300	November	450
600	December	600
350	December	300
60	July	800
100	January	
	January	
	January	
	January	
	January	

April	May	June
9,915	13,220	16,000
2,000	7,000	
	0	

San Dieguito Union High School District

Michael H. Fine
Chief Executive Officer

July 25, 2024

Anne Staffieri, Ed.D., Superintendent
San Dieguito Union High School District
710 Encinitas Blvd.
Encinitas, CA 92024

Dear Superintendent Staffieri:

In March 2024, the San Dieguito Union High School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for FCMAT to conduct a review of the district's special education program. The agreement stated that FCMAT would perform the following:

1. Analyze special education teacher staffing ratios, class sizes and caseloads using statutory requirements for mandated services and statewide guidelines, and make recommendations for improvement, if any.
2. Review the efficiency of staffing allocations of special education paraeducators, per Education Code requirements and/or industry standards, and make recommendations for improvement, if any. Review the procedures for identifying the need for paraeducators, including considerations related to the least restrictive environment and the processes for monitoring the assignment of paraeducators and determining the need for continued support from year to year (including classroom and 1-to-1 paraeducators).
3. Analyze staffing and caseloads for related service providers, including but not limited to speech pathologists, psychologists, occupational/physical therapists, adaptive physical education teachers and other staff who may be related service providers, and make recommendations for improvement, if any.
4. Analyze whether the district provides a continuum of special education and related services for students in preschool through age 22, including their placement in the least restrictive environments, and make recommendations for improvement (which may include instructional models), if any.
5. Review the Special Education Department's organizational structure and staffing within the district's central office to determine whether its administration, clerical and administrative support, program specialists, teachers on special assignment and overall function are aligned with those of districts of comparable size and structure, and make recommendations for greater efficiencies, if any.
6. Review the costs of due processes, mediations and settlements for the past three years and make recommendations for improvements, if any.
7. Review the district's nonpublic school (NPS) and residential treatment center placement trend for the cost per student for the last three years and make recommendations for improvement, if any.

8. Recommend a process for the district to determine placement of moderate/severe service programs within the district.
9. Review special education transportation for efficiency and effectiveness, and provide recommendations for potential cost saving measures, if any. The review will include but not be limited to the role of individualized education programs, routing, scheduling, operations and staffing.

This report contains the study team's findings and recommendations.

FCMAT appreciates the opportunity to serve the San Dieguito Union High School District and extends its thanks to all the staff for their assistance during fieldwork.

Sincerely,

A handwritten signature in black ink that reads "Michael H. Fine". The signature is written in a cursive style with a large, stylized initial "M".

Michael H. Fine
Chief Executive Officer

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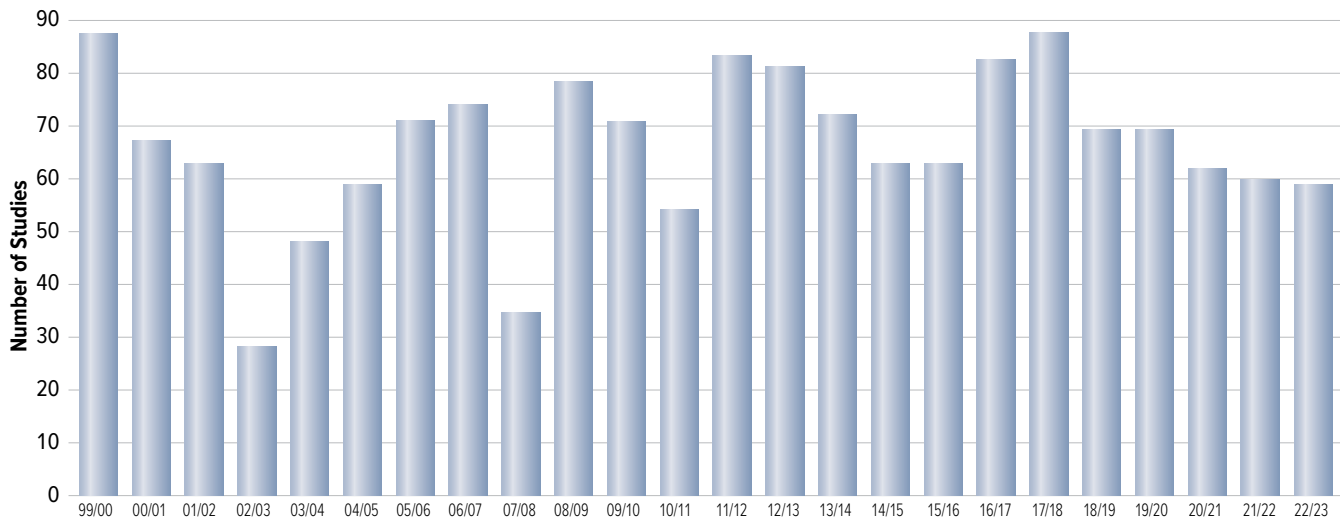
About FCMAT

FCMAT’s primary mission is to assist California’s local TK-14 educational agencies to identify, prevent, and resolve financial, human resources and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related school business and data services. FCMAT’s fiscal and management assistance services are used not just to help avert fiscal crisis, but to promote sound financial practices, support the training and development of chief business officials and help to create efficient organizational operations. FCMAT’s data management services are used to help local educational agencies (LEAs) meet state reporting responsibilities, improve data quality, and inform instructional program decisions.

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

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

Studies by Fiscal Year



FCMAT has continued to make adjustments in the types of support provided based on the changing dynamics of TK-14 LEAs and the implementation of major educational reforms. FCMAT also develops and provides numerous publications, software tools, workshops and professional learning opportunities to help LEAs operate more effectively and fulfill their fiscal oversight and data management responsibilities. The California School Information Services (CSIS) division of FCMAT assists the California Department of Education with the implementation of the California Longitudinal Pupil Achievement Data System (CALPADS). CSIS also hosts and maintains the Ed-Data website (www.ed-data.org) and provides technical expertise to the Ed-Data partnership: the California Department of Education, EdSource and FCMAT.

FCMAT was created by Assembly Bill (AB) 1200 in 1991 to assist LEAs to meet and sustain their financial obligations. AB 107 in 1997 charged FCMAT with responsibility for CSIS and its statewide data management work. AB 1115 in 1999 codified CSIS’ mission.

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

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

On September 17, 2018 AB 1840 was signed into law. This legislation changed how fiscally insolvent districts are administered once an emergency appropriation has been made, shifting the former state-centric system to be more consistent with the principles of local control, and providing new responsibilities to FCMAT associated with the process.

Since 1992, FCMAT has been engaged to perform more than 1,400 reviews for LEAs, including school districts, county offices of education, charter schools and community colleges. The Kern County Superintendent of Schools is the administrative agent for FCMAT. The team is led by Michael H. Fine, Chief Executive Officer, with funding derived through appropriations in the state budget and a modest fee schedule for charges to requesting agencies.

Introduction

Background

Located in San Diego County, the San Dieguito Union High School District is governed by a five-member board and serves students from grades seven through 12. The district encompasses approximately 81.7 square miles and comprises five middle schools, two comprehensive high schools, two academy high schools, and an education center that houses a continuation high school and an adult transition program for students with disabilities. According to [DataQuest](#), the district enrolled a total of 12,364 students during the 2023-24 academic year. The district receives students from five elementary school districts in North County: Encinitas, Rancho Santa Fe, Cardiff, Solana Beach, and Del Mar. Most students from these feeder districts matriculate through San Dieguito's middle schools, although those from the Rancho Santa Fe School District enter the district in grade nine.

San Dieguito Union is a member of the North Coastal Consortium for Special Education Special Education Local Plan Area (SELPA), which is a regional service delivery model for special education. In 2023-24, 11.54% of the district's students were identified as requiring special education, which was below the state-wide noncharter school average of 13.94% for students in grades seven through 12.

In March 2024, the district and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for FCMAT to conduct a review of the district's special education program.

Study and Report Guidelines

FCMAT visited the district on May 1 and 2, 2024, to conduct interviews with district and school administrators, special education teachers, related service providers, and instructional assistants. Following fieldwork, FCMAT reviewed and analyzed data and documents. This report is the result of those activities.

FCMAT's reports focus on systems and processes that may need improvement. Those that may be functioning well are generally not commented on in FCMAT's reports. In writing its reports, FCMAT uses the Associated Press Stylebook, a comprehensive guide to usage and accepted style that emphasizes conciseness, clarity and plain language. In addition, this guide discourages the use of jargon and capitalizes relatively few terms.

Study Team

The study team was composed of the following members:

Carolynne Beno, Ed.D., CFE
FCMAT Intervention Specialist

Colleen Patterson, MBA, CMA
FCMAT Consultant

Tim Purvis
FCMAT Consultant

Cassady Clifton
FCMAT Technical Writer

Those members of this study team who are otherwise employed by a local educational agency (LEA) were not representing their respective employers but were working solely as independent contractors for FCMAT.

All team members reviewed the draft report to confirm accuracy and achieve consensus on the final recommendations.

Executive Summary

Continuum of Services

The district offers a full continuum of special education options and services, enabling it to offer students a free appropriate public education (FAPE). The district met all three targets related to placing school-age students in the least restrictive environment (LRE), as documented in its most recent local level annual performance report, which is commendable.

To support students with disabilities who have mild-to-moderate support needs within their LREs, each of the district's schools uses a collaborative teaching model, pairing a general education teacher with a special education teacher to co-teach in a general education setting. They also offer a Learning Academy, which is dedicated room students can go to when they need to self-regulate. Staff interviewed view the district's inclusive model positively, but many indicated these supports need refinement.

Collaborative teaching is a best practice and improves students with disabilities' access to their typically developing peers and the rigorous instruction given by a general education teacher using the general education curriculum. However, most staff reported that too many students with disabilities are clustered into collaboratively taught classes, which they believe is limiting the program's effectiveness. Further, the district would benefit from training on building a master schedule that supports collaborative teaching. It should also review data on how students with disabilities are clustered into collaboratively taught classes at each of its schools.

The district's learning academies are noninstructional spaces where students with social-emotional or behavioral needs can go to self-regulate before returning to class. Many staff indicated that at least a few students at each school are not supported well by the learning academies. The district should gather and analyze data on Learning Academy use and solicit input from staff and students to determine how to refine the academies.

Special Education Administrator Staffing

San Dieguito Union has 0.90 full time equivalent (FTE) more administrator positions supporting its special education program compared to similar-sized school districts surveyed by FCMAT. The district has 6.0 FTE program supervisor positions that provide special education-related support to one or more district schools. Many staff interviewed expressed the need for a full-time program supervisor. However, FCMAT advises against increasing program supervisor staffing because the district's administrative staffing for the special education program is higher than that of similar districts. Instead, the district may benefit from considering the following:

- **Program Supervisor Schedules** – Schools need their program supervisor to be present during their assigned days within regular school hours. The district would benefit from exploring whether the weekly program supervisor meeting, which takes up half of a school day, can be rescheduled to maximize the amount of time program supervisors spend at their school(s) during regular school hours. The district may also benefit from setting standard work hours for program supervisors, so each school receives a consistent amount of supervisor time daily.
- **Program Supervisor Integration into their Assigned School(s)** – Program supervisors are more integrated into their school(s) when they regularly meet with their respective administrative team and the Special Education Department. This should occur at all district schools. Principals suggested that their involvement in selecting, setting goals, and evaluating pro-

gram supervisors would be helpful. Establishing a culture of shared evaluation and supervision could benefit the district, particularly because program supervisors spend most of their time at their assigned school(s).

- **Behavior Support Needs** – Schools, particularly those with Modified or Seaside programs, need additional support to manage students’ behavioral needs. While many staff reasoned that having their program supervisor at their school more could help meet this need, the role of a behaviorist is better suited for providing such support. A 1.0 FTE behaviorist serves the entire district. Although there is no established industry standard for behaviorist staffing, observations of staffing across the state, coupled with feedback from interviews, indicate a critical need for the district to hire an additional behaviorist.

Other Special Education Staffing

Districtwide special education teacher staffing to support students with mild-to-moderate service needs (excluding those in the Seaside Program) exceeds the standard outlined in Education Code 56362(c) by 12.89 FTE. However, FCMAT advises against reducing staffing because this standard is based on a maximum caseload that is higher than what is observed in districts serving students with an inclusive model like San Dieguito Union. The districtwide Modified Program teacher caseload average of 9.80 students per teacher falls just below the industry standard range of 10-12 students per teacher.

The district’s use of adult-to-student staffing ratios to determine its instructional assistant staffing is a best practice. Overall, its staffing ratios are similar to established industry standard ratios.

The district’s staffing for credentialed school nurses is 3.44 FTE below the industry standard, due at least in part to the challenge of recruiting credentialed school nurses. The district has five student health care specialists who are licensed vocational nurses (LVNs) or registered nurses (RNs). This staffing may allow the district to function adequately without the industry-standard number of credentialed school nurses. The district should assess district enrollment, special education enrollment, duties performed by the credentialed school nurses and the student health care specialists, schoolwide needs, and student needs to determine if increasing credentialed school nurse staffing to better align with industry standards would allow it to provide better service to students.

Process to Examine the Possible Relocation of Certain District Modified Program Classes

FCMAT was asked to recommend a process that the district could use to assess the impacts of relocating one or more of its Modified Program classes to a different district school.

The district can evaluate the possible effects, including one-time and ongoing costs and/or cost savings, using FCMAT’s 4-Step Consideration Process, as detailed in the “[Considerations for Modified Program Class Placement](#)” section of this report (see [Appendix A](#) for FCMAT’s “[Considerations for Modified Program Placement Tool](#)”).

Nonpublic School Placements

FCMAT compared the percentage of the district’s total student population enrolled in a nonpublic school (NPS) to that of other high school districts in San Diego County with a student enrollment of over 9,000. In the 2022-23 academic year, the district served a higher percentage of students with an IEP in a district program, rather than in an NPS, compared to these similar-sized districts.

Over the last three years, the district's NPS average daily attendance (ADA) decreased by 19%, while NPS expenses increased by 53%. Although the district is serving fewer students in an NPS setting — a positive trend — the cost per student has increased significantly. The district should conduct a cost-per-student analysis, which is required to identify and support the annual filing for the state's Special Education Extraordinary Cost Pool for NPS/LCI.

Cost of Due Process, Mediation and Settlements

Special education is a highly litigated area, with the primary basis of litigation centered on disputes over the provision of a FAPE. FCMAT reviewed five decisions from the Office of Administrative Hearings (OAH) involving the district over the last three years. These decisions indicate that the district has been very successful in defending its educational assessments and processes aimed at offering students a FAPE. The court supported the district's actions 86% of the time. However, the district's legal fee and settlement payment costs have steadily increased over the last three years. Between 2021-22 and 2023-24, the district's legal fees increased by \$112,650 and its settlement payments increased by \$99,958.

School Transportation

Since the inception of the Local Control Funding Formula (LCFF), the district has received \$556,202 annually for school transportation. The Budget Act of 2022 increased school transportation funding to match the equivalent of the prior year's student transportation expenditures reported in Function 3600, beginning in the 2022-23 fiscal year. As a result, the district will receive at least \$1,806,533 in additional school transportation funding in 2023-24.

In the 2023-24 fiscal year, the district is projected to spend \$4,921,100 on school transportation. This amount includes capital expenditures for school buses and a relatively large contract for external transportation services. The district is projected to spend \$15,054 per student for school transportation in 2023-24, which is significantly higher than what is observed in similar-sized districts.

In the 2023-24 fiscal year, the district transported 61 students on two general education bus routes and 120 students on 15 special education bus routes. The district's two external transportation providers transported 24 students. While the district's 17 school bus routes were fully staffed at the time of FCMAT's fieldwork, the district lacked available certified bus drivers, preventing the district from adding more routes and reducing its reliance on contracted external transportation providers.

The district's 15 special education bus routes have a passenger average of eight students per bus, which is lower than what is observed across the state. However, this is not indicative of poor routing; rather, it is necessary because the start times for schools are not staggered in a way that would allow the district to increase from one to two bus runs in the morning and afternoon. If the district were able to increase its bus runs, it might be possible to increase the number of students transported per bus and potentially use fewer buses to meet the district's school transportation needs.

Findings and Recommendations

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

Over the past two decades, educational reform movements emphasizing accountability have highlighted achievement gaps among students based on factors such as race and ethnicity, family income, language ability, and disability. Although California has made some progress in reducing inequities in educational outcomes for these student groups, those with disabilities remain among the lowest-performing subgroups.

In 2013 California convened a statewide special education task force dedicated to ending persistent poor outcomes for California's students with disabilities, including infants, toddlers, preschoolers, and students up to age 22 in kindergarten through grade 12 schools. The task force's purpose was to study the complex systems designed to serve students with disabilities and to forward recommendations to the State Board of Education, the Commission on Teacher Credentialing, and the California Department of Education (CDE). In March 2015, the task force published *One system: Reforming Education to Serve All Students, Report of California's Statewide Task Force on Special Education*, as well as an executive summary.

The *Statewide Special Education Task Force Project Summary* found that:

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

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

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

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

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

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

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

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

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

In 2020, the CDE commissioned WestEd, a nonprofit dedicated to fostering “success for every learner,”¹ to analyze policy and systemic changes impacting students with disabilities since the 2015 report on one system. The 2021 WestEd report, *California’s Progress Toward Achieving One system: Reforming Education to Serve All Students*, explains that the 2015 report on one system was intended to create momentum and discourse in California’s efforts to reform special education. To evaluate these efforts, WestEd examined the 2015 report on one system’s seven focus areas and then made additional recommendations in each area. WestEd concluded that “numerous improvements have been made to California’s general and special education landscapes.”

Guided by the insights from the 2015 report on one system and the 2021 WestEd report, districts should focus on achieving coherence, fostering inclusive practices, and integrating student support systems to build a comprehensive educational system that promotes positive outcomes for all students. Districts need to recognize that students who receive special education services are general education students first and operate with the understanding that special education services are one of the many programs of support under general education rather than a place where students go to receive more or different services. These tenets will be used throughout this report to analyze the district’s organization, staffing, continuum of service options, and to inform current recommendations for improvement.

¹WestEd: Success for Every Learner. (n.d.). <https://www.wested.org/about-us/>

District Organization, Central Office Special Education Staffing, and Special Education Strategic Plan

District Organization

The organizational structure of a district plays a critical role in shaping the effectiveness of its special education program. A district should be organized to foster effective communication and collaboration among departments in the district's central office and with its schools. This collaboration is necessary to address the unique needs of students with disabilities and to implement evidence-based practices that promote inclusive education.

The district's executive cabinet includes the superintendent and the associate superintendents of the business services, educational services, and human resources departments. The associate superintendent of educational services oversees the director of school and student services, who provides leadership over the special education program. Staff stated that the director of school and student services, along with other members of the special education leadership team, regularly collaborates with district personnel on key functions, including budget development, staffing, curriculum adoption, and Local Control and Accountability Plan² (LCAP) development. This positive practice aligns with the 2015 report on one system, as it promotes coherence and prevents the special education program from operating as a separate system within the district.

The board approved a plan to reorganize the Educational Services Department just before FCMAT's visit in April of 2024, as shown in Figure 1 on the following page.

²A three-year plan that describes the goals, actions, services, and expenditures to support positive student outcomes.

Simplified Organizational Chart for the Reorganized Educational Services Department

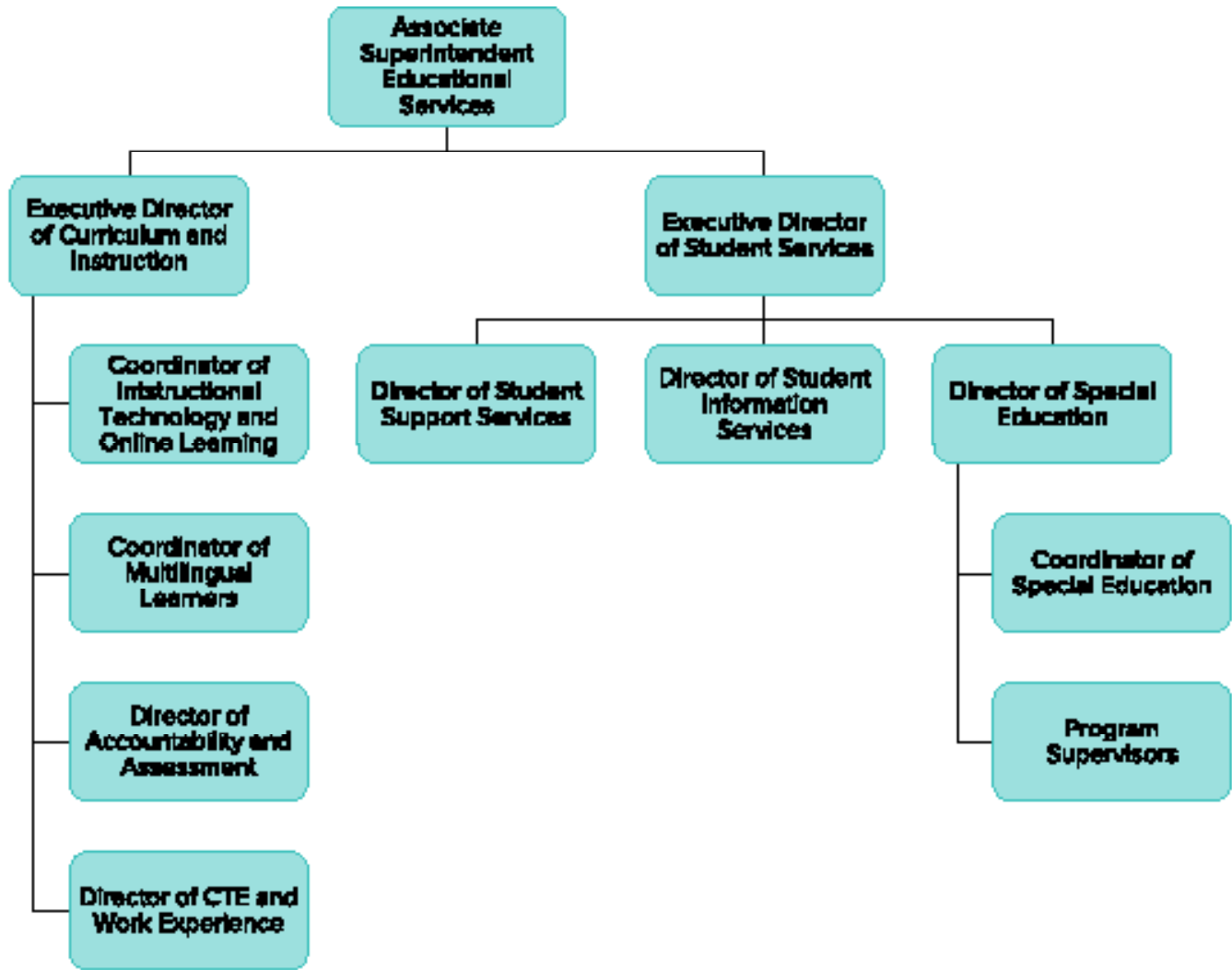


Figure 1. An organizational chart showing a simplified version of the district’s reorganized Educational Services Department with the executive director, director, and coordinator positions, and the Special Education Department’s administrator positions.

Source: District-provided data.

Note: The acronym “CTE” stands for career technical education.

As part of the department’s reorganization, staff reported that job duties and key responsibilities were evaluated and revised.

Program Supervisor Position

The district has 6.0 full-time equivalent (FTE) program supervisor positions. Typically, these supervisors support multiple schools, allocating specific days of the week to each assigned location. District documents indicate the primary responsibilities of a program supervisor as follows:

- Providing special education-related support to the school’s Special Education Department chair, principal, and assistant principal.
- Overseeing individualized education program (IEP) compliance and providing IEP-related training.

- Supervising and evaluating the school's instructional assistants (in collaboration with the school administration).
- Providing professional development.
- Acting as the liaison for special education support between the district office and school.
- Helping special education staff at the school implement the district's special education processes and procedures.

Many staff interviewed expressed the need for a full-time program supervisor at every school, particularly for help with contentious IEP meetings and student behavior interventions. However, the district's administrative staffing for special education is already higher than that of comparable districts, as described in the "Special Education Administrator and Administrative Support Staffing" section of this report. As such, FCMAT advises against increasing program supervisor staffing. Instead, the district could consider the following:

- **Program Supervisor Schedules** – Schools need their program supervisor to be present during their assigned days within regular school hours.
 - **IEP Meeting Availability:** The district's collective bargaining agreement requires that IEP meetings be held during regular school hours. However, program supervisors spend half a day each week at the district office for meetings with the director of special education and the coordinator of special education services. This schedule means program supervisors are unavailable for IEP meetings during these times, which many staff members reported as creating a hardship. Although holding weekly meetings is a best practice for facilitating communication and providing decision support, the district could benefit from exploring alternative scheduling to maximize program supervisors' presence at school(s) during regular school hours.
 - **Work Hour Clarity:** Many staff members noted that the district has not established standard work hours and school presence expectations for program supervisors. Standardizing work hours could ensure that each school receives a consistent and predictable amount of supervisor time daily.
- **Program Supervisor Integration into their Assigned School(s)** – Program supervisors are more integrated into their school(s) when they regularly meet with the administrative team and the Special Education Department.
 - **Collaboration and Communication:** The best practice involves holding regular team meetings to discuss significant issues, explore solutions, and make collective, informed decisions, which leads to improved outcomes and a sense of shared responsibility. While some program supervisors have regularly scheduled meetings with their schools' administrative teams and/or special education departments, others do not, which conflicts with the integrated systems advocated in the 2015 report on one system. Staff reported that some program supervisors do not attend site team meetings either due to limited time spent at certain schools or because they cannot attend at the scheduled meeting times. Although ad hoc communications occur among the program supervisors and principals, assistant principals, and special education staff, structured, regular meetings are essential. These meetings are crucial for fostering integration, facilitating open communication, and building trust, providing valuable opportunities to discuss issues, brainstorm ideas, and address concerns.

- **Role of Program Supervisors as Liaisons:** Program supervisors serve as important liaisons between district and school leaders. Many staff characterized them as “shared employees,” but explained that they are hired, supervised, and evaluated solely by the director of school and student services given the specialized expertise required in special education. Principals suggested that their involvement in selecting, setting goals, and evaluating program supervisors would be helpful. Establishing a culture of shared evaluation and supervision could benefit the district, particularly because program supervisors spend most of their time at their assigned school(s).
- **Behavior Support Needs** – Schools, particularly those with special day class programs (self-contained classrooms for students with disabilities), need additional support to manage students’ behavior needs.
 - **Increased Demand:** Most staff reported that student behavioral support needs have grown since the return to school following the COVID-19 pandemic. While some students require direct behavior support services, teachers and other staff need training, consultation, and other support to effectively manage these behaviors. Program supervisors provide some support for student behavior at their assigned school(s) when they are on campus. However, most staff indicated that additional support is needed to assess students’ behavioral needs, help staff in developing and implementing behavior intervention plans, and performing functional behavior assessments — tasks best conducted by a behaviorist.
 - **Staffing Need:** The district has a 1.0 FTE behaviorist who serves the entire district. Although there is no established industry standard for behaviorist staffing, observations of staffing in comparable districts across the state, coupled with feedback from interviews with San Dieguito staff, indicate a critical need for the district to hire another behaviorist.

Special Education Administrator and Administrative Support Staffing

Administrator Positions

The Special Education Department has 8.00 full-time equivalent (FTE) administrator positions, as shown below in Table 1.

Table 1. Administrator Positions Supporting Special Education in 2023-24

Position Title	Number of Positions	Total FTE
Director of Special Education	1	1.00
Coordinator of Special Education Services	1	1.00
Program Supervisor	6	6.00
Total	8	8.00

Source: District-provided data.

The district also has three teacher on special assignment (TOSA) positions, which were not included in the staffing comparisons with similar districts shown in Table 3 because they are temporary. Two of these TOSA

positions are funded through the Educator Effectiveness Block Grant and provide instructional and curriculum support for both special education and general education teachers. The third TOSA position is funded through the district's LCAP and focuses on intervention, inclusion, and outreach. These positions align with the 2015 report on one system because they facilitate the inclusion of students with disabilities in general education environments.

Administrative Support Positions

The Special Education Department has 3.00 FTE administrative support staff, as shown below in Table 2.

Table 2. Administrative Support Staff Positions Supporting Special Education in 2023-24

Position Title	Number of Positions	Total FTE
Administrative Assistant III	1	1.00
Administrative Assistant II	1	1.00
Information Systems Support Technician	1	1.00
Total	3	3.00

Source: District-provided data.

Note: The Special Education Department's Spanish translator/interpreter position was excluded from the total number of positions because school districts do not always centralize the services this position provides. In such cases, these services are provided by staff at individual schools.

Special Education Staffing Comparison

FCMAT conducted an informal survey among unified and high school districts in California with student enrollment and unduplicated pupil percentages³ (UPP) similar to San Dieguito Union. The survey focused on gathering information about these districts' Special Education Department central office staffing in two areas:

1. **Central office administrator/leadership positions:** This includes roles such as directors, assistant directors, coordinators, program specialists, and TOSAs. These positions do not need to require an administrative credential.
2. **Central office administrative support positions:** This includes roles such as secretaries, administrative assistants, filing clerks, and data technicians.

Table 3 on the following page compares San Dieguito Union's Special Education Department's central office staffing to the responses from the five districts that replied to FCMAT's survey. Among these comparison districts, the average number of FTE leadership/administrator positions supporting special education in the central office is 7.10, while San Dieguito Union reports a slightly higher figure of 8.00 FTE. In terms of special education administrative support positions in the central office, the average among the comparison districts is 3.70 FTE, whereas San Dieguito Union reports a slightly lower figure of 3.00 FTE.

³This acronym refers to the percentage of students who are English learners, foster youth, or qualify for free or reduced-price meals. A student is counted only once even if they are in more than one of these categories.

Table 3. Leadership and Administrative Support Staffing Comparison, 2023-24

District	County	2022-23 Census Day Enrollment	2022-23 Census Day UPP%	2023-24 Administrator/ Leadership Position FTE	2023-24 Administrative Support Position FTE
Carlsbad Unified School District	San Diego	10,981	23.05%	4.50	2.50
Fremont Union High School District	Santa Clara	10,019	17.39%	7.00	6.00
Roseville Joint Union High School District	Placer	12,237	22.46%	7.00	2.00
Santa Clara Unified School District	Santa Clara	13,919	50.14%	10.00	4.00
Sequoia Union High School District	San Mateo	9,802	27.21%	7.00	4.00
Average FTE				7.10	3.70
San Dieguito Union	San Diego	12,615	18.99%	8.00	3.00

Sources: Comparisons (Ed-Data) and district-provided information in response to FCMAT survey.

Notes: “Census Day Enrollment” and “Census Day UPP%” data from the most recent year available.

San Dieguito Union was excluded from the average FTE calculations.

Teachers on special assignments (TOSAs) were included in administrator/leadership FTE count only if they were ongoing positions performing special education program support functions in the central office.

San Dieguito Union has 0.90 FTE more administrator/leadership positions and 0.70 FTE fewer administrative support positions supporting the special education program compared to the average of the five comparison districts.

Special Education Strategic Plan

The district’s Special Education Strategic Plan defines the structure of its programs for students with disabilities. It is closely aligned with the 2015 report on one system, with a focus on providing students with disabilities access to standards-aligned curricula and individualized support and resources in the LRE. The plan is organized around six priorities, which include:

1. Transitions/College and Career/Post Secondary.
2. Communication.
3. Curriculum/Instruction and Programs.
4. Professional Development and Staffing.
5. Inclusion: Meaningful Student Involvement.
6. Accountability/Oversight.

Each priority has a central goal aligned with the district’s LCAP. This alignment promotes coherence, reinforces the principle that students with disabilities are general education students, and helps prevent special education from being viewed as a separate, isolated program. Each central goal in the Special Education Strategic Plan contains specific action steps and tasks to guide its implementation.

Recommendations

The district should:

1. Determine whether weekly program supervisor meetings at the district office can be rescheduled to maximize the time program supervisors spend at their schools during regular school hours.
2. Consider setting standard work hours for program supervisors to ensure each school receives a consistent amount of daily support.
3. Ensure that program supervisors meet regularly with the administrative team and Special Education Department at each of their assigned schools.
4. Consider establishing a culture of shared supervision and evaluation of the program supervisors by both the special education director and school principals.
5. Hire an additional behaviorist to support student behavior needs across the district.

Special Education Identification Rate

Between 2018-19 and 2023-24, the district’s census day enrollment for grades seven through 12 decreased by 764 students, as shown in Figure 2 below.

Census Day Enrollment of District Students in Grades 7-12, 2018-19 — 2023-24

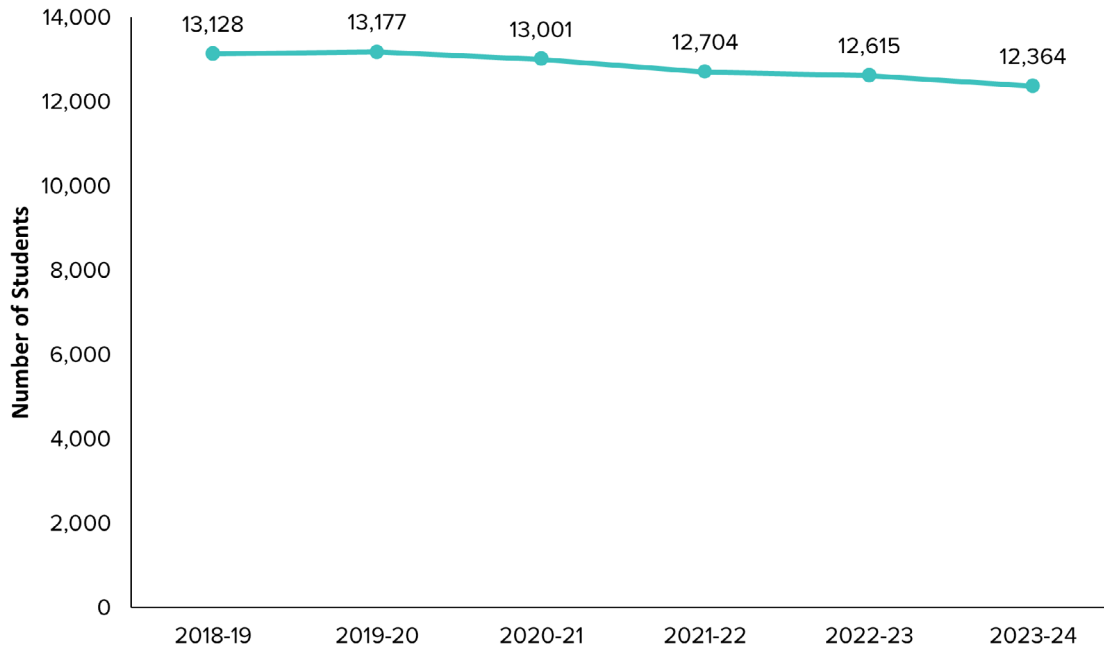


Figure 2. A graph showing the district’s census day enrollment for grades seven through 12 from 2018-19 to 2023-24.

Source: Enrollment for Charter and Non-Charter Schools - San Dieguito Union High School (CDE).

Between 2018-19 and 2023-24, the district’s special education enrollment increased by 168 students, as shown in Figure 3 below.

Number of District Students in Grades 7-12 Enrolled in Special Education, 2018-19 — 2023-24

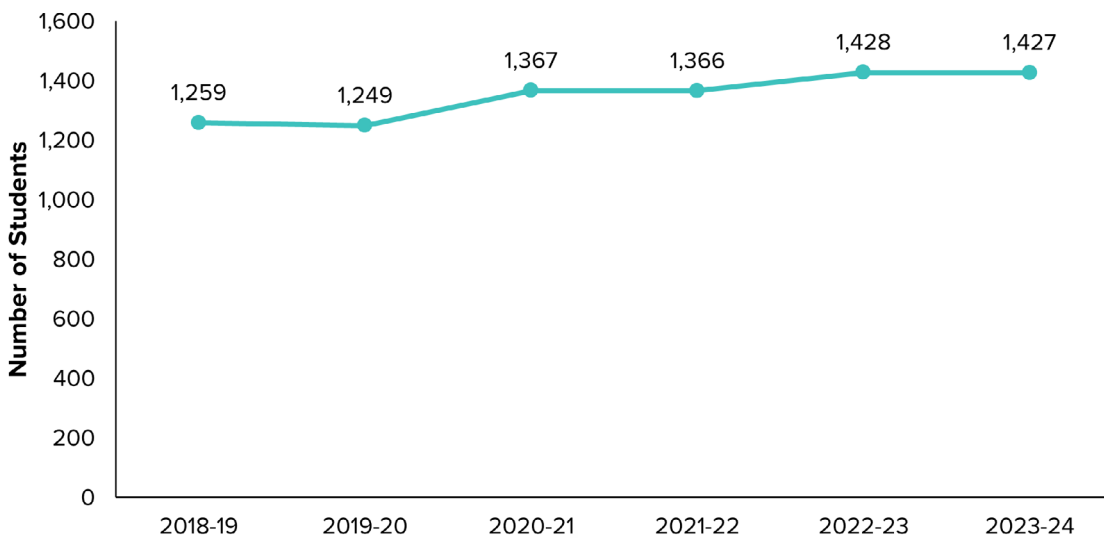


Figure 3. A graph showing the number of district students in grades seven through 12 enrolled in special education from 2018-19 to 2023-24.

Source: Enrollment for Charter and Non-Charter Schools - San Dieguito Union High School (CDE).

Between 2018-19 and 2023-24, the percentage of district students in grades seven through 12 enrolled in special education increased by 1.95 percentage points, as shown in Figure 4 below.

Percentage of District Students in Grades 7-12 Enrolled in Special Education, 2018-19 — 2023-24

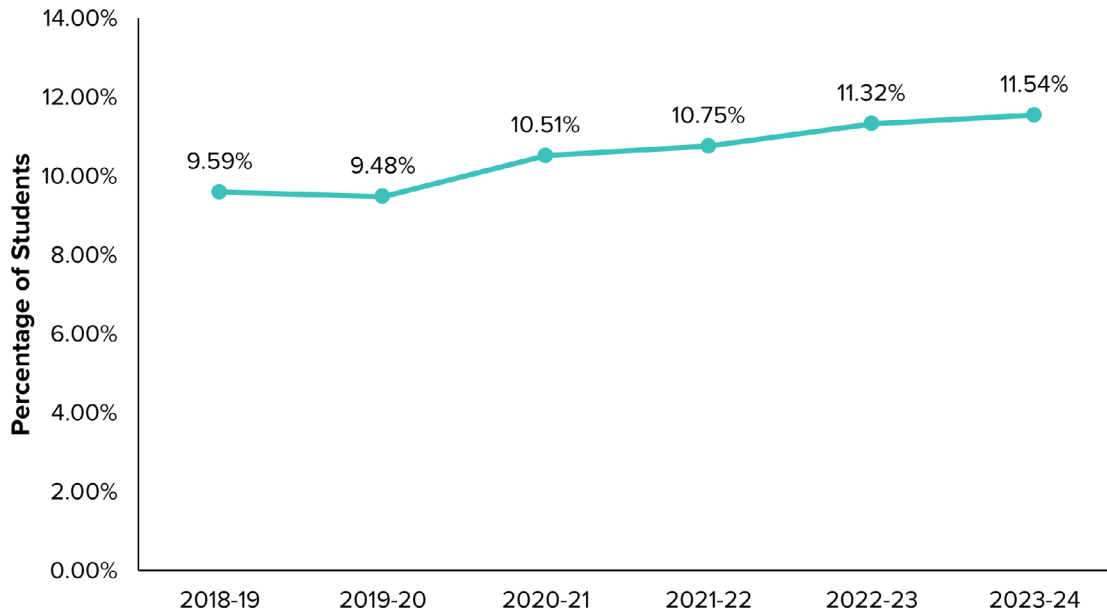


Figure 4. A graph showing the percentage of district students in grades seven through 12 enrolled in special education from 2018-19 to 2023-24.

Source: Enrollment for Charter and Non-Charter Schools - San Dieguito Union High School (CDE).

FCMAT conducted an analysis of total and special education noncharter school enrollment for grades seven through 12 for the district, San Diego County, and the state, as shown in Table 4 below.

Table 4. Grades Seven through 12 Total and Special Education Enrollment Comparison in 2023-24

2023-24	San Dieguito Union High School District	San Diego County	California
Grades 7-12 Noncharter Enrollment	12,364	182,865	2,434,527
Grades 7-12 Noncharter Special Education Enrollment	1,427	29,427	339,479
Percentage	11.54%	16.09%	13.94%

Sources: Enrollment for Charter and Non-Charter Schools - San Dieguito Union High School (CDE) and Enrollment by Subgroup for Charter and Non-Charter Schools (CDE).

In 2023-24, 11.54% of the district’s students in grades seven through 12 were identified as requiring special education. This percentage is lower than the noncharter school countywide and statewide averages for students in grades seven through 12.

Continuum of Service Options for Students in Special Education

The Individuals with Disabilities Education Act (IDEA) establishes nationwide minimum standards for providing education services to children with disabilities, as well as related services for eligible infants, toddlers, preschoolers, children and youth with disabilities up to the age of 22. It mandates that each state ensures the availability of a free appropriate public education (FAPE) for any child with a disability in need of special education and related services, regardless of whether they have failed or been retained in a course or grade, and even if they are advancing from one grade level to another (Title 34, Section 300.101(c) of the Code of Federal Regulations [34 CFR 300.101(c)]).

The district provides related services, such as speech and language therapy, adapted physical education (APE), and occupational therapy (OT), for students with disabilities. These services are provided by qualified specialists/service providers in accordance with students' IEPs. Service providers may support students individually, in groups, and/or through consultation.

The district's continuum of academic support for students with disabilities includes both general education and a Modified Program.

General Education

General education content courses are taught by a general education content area specialist in a general education setting. Co-taught general education content courses are taught by a general education content area specialist and an education specialist partner teacher together in a general education setting. In these co-taught courses, the education specialist scaffolds instruction by breaking down a lesson into distinct segments to support students in accessing the material. In both general education content and co-taught general education content courses, students with disabilities receive accommodations as outlined in their IEPs. The district's educational programs for students accessing the general education curriculum include:

- **Targeted Academic Instruction (TAI)** – These courses are small-group classes taught by an education specialist in a special education setting. They support each student's IEP goals through targeted intervention strategies focused on English language arts, mathematics and/or executive functions, which are skills to develop goals, manage emotions, and solve problems. Students receive elective course credit for these classes.
- **Learning Academy** – This academy supports students enrolled in special education who require specialized support to benefit from the general education curriculum and instruction. Students in a Learning Academy have access to a "home base" environment where they can go to self-regulate and receive specialized supports addressing areas such as behavior and executive functions. All district schools offer a Learning Academy, except for the district's alternative high school and its adult transition program.
- **Seaside Prep Program** – This program supports students who require intensive therapeutic and/or behavioral support to benefit from their education. Students can participate in general education classes and/or receive instruction in a small group special education therapeutic setting. Seaside Prep is available at Pacific Trails Middle School and the San Dieguito High School Academy.

Modified Program

The district's Modified Program supports students with moderate-to-severe service needs who benefit from an individualized and modified curriculum. The program emphasizes IEP goal skill-building in the areas of behavior, pragmatics (appropriate use of language in different social contexts), health, safely navigating the community, career/vocational training, social and interpersonal skills, independent living, and recreation/leisure. Students receive their education through a combination of special education and general education classroom settings. The district offers the following modified programs:

- **Foundational Academics** – These academic courses deliver specialized instruction that is driven by IEP goals and highly individualized, provided in small group special education environments. They are taught by education specialists who use standards-based curricula that are modified to focus on building basic and essential academic skills. These courses do not meet diploma credit requirements. Foundational Academics courses are available at Carmel Valley Middle School, Oak Crest Middle School, La Costa Canyon High School, and Torrey Pines High School.
- **Functional Academics** – These academic courses deliver instruction that is driven by IEP goals and highly individualized, provided in 1-to-1 or in small group special education environments. They are taught by education specialists who use standards-based curricula that are highly modified to focus on independent living skills. These courses do not meet diploma credit requirements. Functional Academic courses are available at Carmel Valley Middle School, Oak Crest Middle School, La Costa Canyon High School, and Torrey Pines High School.
- **Access Courses** – These courses are designed for students who require a modified curriculum to participate in general education settings. They provide inclusive opportunities for students to access the general education classroom and curriculum alongside their typically developing peers.
- **Community Opportunities for Adult Students (COAST) Academy** – The COAST Academy, located at the Requeza Educational Center, supports transition-age students with disabilities ages 18 to 22 who have participated in four years of high school but have not received a diploma. The program's specialized curriculum focuses on areas such as independent living, career and vocational training, recreation and leisure activities, and social, interpersonal and community connections. This individualized program is delivered in both special education and community-based settings.

In addition to the in-district program options, a small number of district students with IEPs attend out-of-district programs. These options include regionalized programs or nonpublic schools (NPSs). Students attending a regionalized program typically have disabilities, such as being deaf or hard of hearing, that require access to specialized classes. NPSs are privately operated, publicly funded schools that specialize in providing educational services for students with exceptional needs that cannot be met in a traditional public school setting.

Placement in the Least Restrictive Environment

The IDEA requires that students with disabilities be offered a FAPE and be educated in the LRE. To determine the appropriate setting for an individual student, their IEP team reviews the student's strengths and needs and considers the educational benefit of placement in different educational settings. The assessment of LRE placement is conducted through the CDE's local level annual performance report. These

reports, required by the IDEA, evaluate districts on 14 indicators for which the target is “met” or “not met.” In 2022-23, the district met all three targets for indicator 5, which assesses the placement of school-age students in the LRE, as shown in Table 5 below.

Table 5. District’s 2022-23 Performance on Indicator 5 — School-age Students in the Least Restrictive Environment

Indicator	Indicator	Rate	Target	Target Met?
5a	LRE Rate: In Regular Class More than 80%	64.97%	≥62.00%	Yes
5b	LRE Rate: In Regular Class Less than 40%	7.39%	<16.50%	Yes
5c	LRE Rate: Separate Schools	1.54%	<3.00%	Yes

Source: Local Level Annual Performance Report 2022-23 (CDE) (most recent report).

Continuum of Services - Alignment with the 2015 Report on One System

The district offers a full continuum of special education options and services and has shifted its service delivery model to improve access for students with disabilities to general education environments. This shift has enabled the district to meet all LRE indicators. Moreover, the district’s continuum of services model is strongly aligned with the 2015 report on one system. For example, staff in various general and special education roles indicated a collective responsibility to support students receiving special education services. Staff reported that evidence-based inclusive practices, such as collaborative teaching, are in use. Most staff described special education services as a support within the general education program rather than a separate system or place for students with disabilities.

Continuum of Services - Areas for Improvement

Many staff interviewed reported that the district’s collaborative teaching program and Learning Academy, which are part of its continuum of services for students with mild-to-moderate support needs such as learning disabilities, need improvement.

Collaborative Teaching Program

To support the inclusion of students with disabilities in general education settings, the district offers a collaborative teaching program in which a general education teacher and a special education teacher are paired to co-teach in a general education setting. Collaborative teaching programs are a best practice that improve access for students with disabilities to their typically developing peers and the rigorous instruction given by a general education teacher using the general education curriculum. Studies have found that collaborative teaching is correlated with positive effects on student achievement.⁴

A best practice is to provide collaborative teaching pairs with training on co-planning and co-teaching. In addition, the employees responsible for developing the school’s master schedule training should be trained to support collaborative teaching. Many district staff members reported that general and

⁴Vembye, M. H., Weiss, F., & Hamilton Bhat, B. (2024). The effects of co-teaching and related collaborative models of instruction on student achievement: A systematic review and meta-analysis. *Review of Educational Research*, 94(3), 376-422. <https://doi.org/10.3102/00346543231186588>

special education teachers have previously received training on collaborative teaching. However, they also noted that they have not received training on developing a master schedule that supports collaborative teaching.

An important aspect of building a master schedule to support collaborative teaching is balancing the proportion of students with disabilities to typical learners in general education classes. Wendy Murawski, Ph.D., the chief executive officer and founder of 2Teach, an educational consulting company dedicated to supporting the global education community in developing inclusive learning environments and addressing diverse student needs (<https://2teachllc.com>), advises that:

While no magic number exists, experts recommend having natural proportions of students with disabilities in classes. The key: Avoid having more than 30 percent of the class with special needs. Though it may be convenient to cluster more students with disabilities into one class, the desired benefits can be negated by this action, leading to lower academics, decreased behaviors and increased teacher frustration.⁵

Most district staff reported that clustering too many students with disabilities into collaboratively taught classes is limiting the program's effectiveness. To address this issue, the district would benefit from analyzing the proportion of students with disabilities to typical learners in collaboratively taught general education classes at each school. Additionally, the district should consider providing training on developing a master schedule to support collaborative teaching. This training should be offered to school staff who work on the master schedule, administrators, and special education teacher leaders.

Learning Academy

All the district's comprehensive and academy schools offer a Learning Academy, a noninstructional space known as a "home base" where students with social-emotional or behavioral needs can go to self-regulate before returning to class. Before revising its continuum of services to maximize access for students with disabilities to general education settings, the district operated learning centers. Staff explained that one reason for discontinuing the centers was that certain students would spend a large portion of their day there to avoid instruction, which also contradicted the principles outlined in the 2015 report on one system.

Many staff indicated that at least a few students at each school, who used to regularly visit their school's learning center, have not transitioned well to receiving support through collaborative teaching and their school's Learning Academy. It would benefit the district to gather and analyze data on Learning Academy usage to assess usage patterns at each school and determine if they are being used as intended. In addition, soliciting input from various staff members such as instructional assistants, administrators, general education and special education teachers, and related service providers could help the district evaluate the effectiveness of the learning academies in meeting student needs and identify opportunities for refinement.

Recommendations

The district should:

1. Continue to monitor the percentage of the school day that students with IEPs are educated in general education settings, with a focus on continuing to meet and exceed LRE targets in the local level annual performance report.

⁵Murawski, W.W. (2008). Five keys to co-teaching in inclusive classrooms. *The School Administrator*, 65(8).

2. Provide training for relevant school staff on building master schedules that support collaborative teaching.
3. Determine the proportion of students with IEPs to typical learners in collaboratively taught classes at each school.
4. Consider establishing a target proportion of students with IEPs to typical learners for collaboratively taught classes.
5. Collect data on the number of students using the Learning Academy at each school and the amount of time they spend there to determine whether they are being used as intended.
6. Solicit feedback from students and staff to better understand the strengths and areas for improvement for the learning academies.

Process to Examine the Possible Relocation of Certain District Modified Program Classes

FCMAT was asked to recommend a process for the district to use in assessing the impacts of relocating one or more of its Modified Program classes to a different district school site.

The district operates five comprehensive middle schools for grades seven through eight, and four high schools for grades nine through 12 (two comprehensive and two academy high schools). The two academy high schools are schools of choice and offer a 4x4 schedule in which students take four 90-minute classes each day, completing a traditionally full-year course in one semester. Moreover, the district has an education center that houses a continuation high school and an adult transition program for students with disabilities.

District Schools Offering the Modified Program

The district's Modified Program has historically been offered at four schools: one middle school in the north end, one middle school in the south end, one comprehensive high school in the north end, and one in the south end of the district. Students matriculate into the district from five different feeder districts through its middle schools, except for those from the Rancho Santa Fe School District, who enter the district in grade nine. Because the Modified Program is not offered at all district schools, some students in the program do not attend their home school.

In the 2023-24 fiscal year, the district had 10.4 FTE teachers and 101 students in modified programs at the middle and high schools, as described below.

Middle School Modified Program

The district's Middle School Modified Program is offered at Carmel Valley and Oak Crest middle schools. In the 2023-24 fiscal year, the district had 4.0 FTE teachers serving 39 students in the Middle School Modified Program, as shown in Table 6 below.

Table 6. Teacher Staffing, Student Caseload, and Average Caseload for the Modified Middle School Program in 2023-24

Middle School	Total Modified Teacher FTE	Total Modified Program Student Caseload	Average Caseload
Carmel Valley Middle School	2.00 FTE	20.00	10.00
Oak Crest Middle School	2.00 FTE	19.00	9.50
Total	4.00 FTE	39.00	9.75

Source: District-provided data.

Note: Diegueño Middle School, Earl Warren Middle School or Pacific Trails Middle School are not included in Table 6 because they do not have modified programs.

The average caseload for the districtwide Middle School Modified Program is 9.75 students per teacher, which is slightly below the industry standard of 10-12 students per teacher. The number of students in the Modified Program is well balanced between the two middle schools offering the program, with Oak Crest Middle School having just one fewer student than Carmel Valley Middle School. The average caseload at each school is at or just below the industry standard.

High School Modified Program

The district's High School Modified Program is offered at La Costa Canyon and Torrey Pines high schools. In the 2023-24 fiscal year, the district had 6.4 FTE teachers and 62 students in the High School Modified Program, as shown in Table 7 below.

Table 7. Teacher Staffing, Student Caseload, and Average Caseload for the Modified High School Program in 2023-24

High School	Total Teacher FTE	Total Modified Program Student Caseload	Average Caseload
La Costa Canyon High School	3.20 FTE	34.00	10.63
Torrey Pines High School	3.20 FTE	28.00	8.75
Total	6.40 FTE	62.00	9.69

Source: District-provided data.

Note: Canyon Crest Academy High School and San Dieguito High School Academy are not included in Table 7 because they do not have modified programs.

The average caseload for the districtwide High School Modified Program is 9.69 students per teacher, which is just below the industry standard of 10-12 students per teacher. The Modified Program at La Costa Canyon High School is slightly larger, with six more students than the program at Torrey Pines High School. The average caseload at La Costa Canyon High School falls within the industry standard of 10-12 students per teacher, while the average caseload at Torrey Pines High School is below the industry standard by 1.25 students per teacher.

Overall, the district's average caseload for Modified Program teachers is just under the industry standard at both the middle and high school levels. This indicates that the district has an adequate number of Modified Program classes and teachers to support the number of students accessing these programs.

Considerations for Modified Program Class Placement

If the district considers changing the location of one or more of its classes for students in the Modified Program, it should use at least the following data sources to inform its decision:

- Input from educational partners such as classified and certificated staff, administrators, parents/guardians, and students.
- Quantitative (i.e., numerical) data collected from sources such as the student information system and special education information system.
- Qualitative (i.e., descriptive or verbal/written feedback) data collected from sources such as observations, in-depth interviews, and focus groups.

The district should evaluate the possible effects of relocating a Modified Program class to a different school site, including the one-time and ongoing costs and/or cost savings, in areas such as LRE, program, facilities, specialized equipment, curriculum, transportation, and staffing. The district may benefit from using FCMAT's 4-Step Consideration Process, which is summarized in Figure 5 on the following page and further detailed in this section. A complete copy of this tool is provided in [Appendix A](#) of this report.

FCMAT's 4-Step Consideration Process

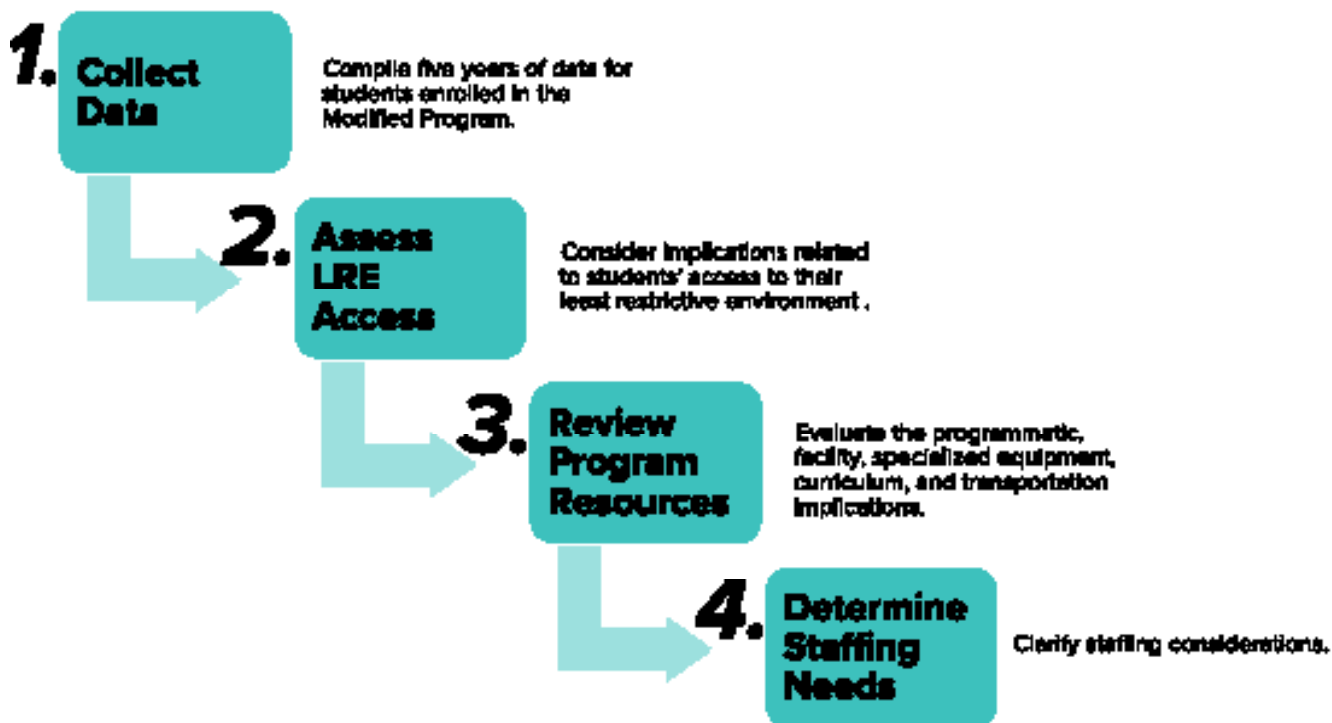


Figure 5. A graphic showing a simplified version of FCMAT's 4-Step Consideration Process for evaluating the possible impacts of relocating a Modified Program class to a different school site.

Source: FCMAT.

Step 1: Collect Data

To establish enrollment patterns and school transportation use trends, the district should compile five years of data for students in the Modified Program, including at least the following information:

- Student's school of attendance.
- Student's home school.
- Whether transportation was provided for the student as a necessary related service.
- Whether transportation was provided because the student was not attending their home school.

This enrollment and school transportation data will be used in steps 2 and 3 of the consideration process.

Step 2: Assess LRE Access

The term "least restrictive environment" refers to the principle that students with disabilities should be educated alongside their nondisabled peers as much as possible. The goal is to provide an appropriate education while minimizing restrictions. Ideally, students in the Modified Program would attend their neighborhood school middle and high schools alongside the nondisabled peers they attended elementary school with, as well as other students from their neighborhood.

To evaluate which school currently without a Modified Program class might be the most appropriate site from an LRE perspective, the district should complete Table 8 below for each school site being considered. To complete Table 8 (and tables 9-13):

1. Review each “starting question.”
2. Identify the sources of qualitative and quantitative data that best answer each starting question. While certain starting questions have suggested data sources, the district should consider additional data sources as well.
3. Determine the possible fiscal impacts, including one-time versus ongoing costs and increased costs versus cost savings.

Table 8. 4-Step Consideration Process - Least Restrictive Environment Considerations

Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impacts (Determine Estimate or Indicate N/A)
A. How many students in the Modified Program would have been able to attend their home school over the past five school years if the program had been located at [insert school name]?	Review data compiled in Step 1 of the consideration process.	
B. How many students in the Modified Program would have lost access to their home school over the past five school years if the program had been located at [insert school name]? Note: To balance the Modified Program classes at different school sites due to student numbers and/or individual student needs, certain students may not be able to attend a class at their home school.	Review data compiled in Step 1 of the consideration process.	
C. Does [insert school name] have other specialized programs such as the Seaside Prep Program?		
D. What is the number and percentage of students in special education schoolwide at [insert school name]? Note: Ideally, the different school sites in the district should have approximately the same percentage of students enrolled in special education.		

Source: FCMAT.

The district should use the data in Table 8 to identify which school site(s) currently without a Modified Program class to evaluate further in Step 3 of the consideration process.

Step 3: Review Program Resources

To evaluate additional factors for each school site being considered to receive a Modified Program class, the district should complete tables 9 through 12, as shown on pages 23-25.

Table 9. 4-Step Consideration Process - Programmatic Considerations

Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impact (Determine Estimate or Indicate N/A)
A. Does [insert school name] have a block schedule or a traditional schedule?		
B. Does [insert school name]’s schedule offer adequate opportunities for students in the Modified Program to take elective or other general education classes?		

Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impact (Determine Estimate or Indicate N/A)
C. What training would staff at [insert school name] need to support students in the Modified Program? Note: Consider topics such as disability awareness, differentiation, accommodations and modifications, nonviolent crisis intervention, and universal design for learning.		
D. Does [insert school name] have the capacity to provide adequate options for the inclusion of students in the Modified Program in nonacademic programs? Note: Consider areas such as extracurricular activities, athletics, and clubs.		
E. Does the programming at [insert school name] allow for a functional continuation of the current individualized education programs (IEPs) of all students who would be moving schools? Note: Certain aspects of student IEPs may need to be modified such as the percentage of time in general education.		

Source: FCMAT.

Table 10. 4-Step Consideration Process - Facility Considerations

Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impact (Determine Estimate or Indicate N/A)
A. Does [insert school name] have classroom space available that is appropriate to meet the needs of students in the Modified Program? Note: Consider classroom size, Americans with Disabilities Act accessibility, restroom space allowing for specialized equipment and changing tables, and space for activities and equipment (e.g., stoves, washers, dryers) to support the development of independent living skills.		
B. How would the identified classroom space at [insert school name] need to be retrofitted to support independent living skill-building activities? Note: Consider the potential modifications needed for infrastructure and the equipment that may need to be purchased, such as washers, dryers, stoves, and refrigerators.		
C. Does [insert school name] have a designated room that can be used to support dysregulated students? If so, can this room support students from the Modified Program, or would another space need to be designated?		
D. Would any part of [insert school name]'s campus need to be altered to make it accessible to and usable by students in the Modified Program? Note: Consider nonclassroom spaces that students may require access to.		

Source: FCMAT.

Table 11. 4-Step Consideration Process - Specialized Equipment and Curriculum Considerations

Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impact (Determine Estimate or Indicate N/A)
A. What specialized equipment shared among the Modified Program classes at a school site would need to be purchased for a Modified Program class at [insert school name]? Note: Consider equipment such as a Hoyer Lift.		

Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impact (Determine Estimate or Indicate N/A)
B. What materials currently shared among the Modified Program classes at a school site would need to be purchased for a Modified Program class at [insert school name]? Note: Consider both low-tech and high-tech items such as curriculum materials, items supporting sensory regulation needs, and tools for activities that support independent living skills.		

Source: FCMAT.

Table 12. 4-Step Consideration Process - Transportation Considerations

Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impact (Determine Estimate or Indicate N/A)
A. If a Modified Program class were moved to [insert school name], how many of the students in that class would receive transportation as a necessary related service?	Review data compiled in Step 1 of the consideration process.	
B. If a Modified Program class were moved to [insert school name], how many of the students in that class would no longer receive transportation because they are now attending their home school? Note: This only applies to students who do not receive transportation as a necessary related service.	Review data compiled in Step 1 of the consideration process.	
C. How would moving a Modified Program class to [insert school name] impact the overall efficiency of the district’s school transportation program? Note: Consider factors such as the number of special education bus routes, the number of students per route, and the number of bus drivers needed. The way master bell times are staggered between the schools may also impact efficiency and the number of bus routes required.		
D. How would moving a Modified Program class to [insert school name] impact the amount of time students in the Modified Program spend on the bus during each run?		

Source: FCMAT.

After completing tables 9 through 12, the district should proceed to Step 4 of the suggested consideration process.

Step 4: Determine Staffing Needs

As noted in the “District Schools Offering the Modified Program” section of this report, the district’s average caseload for Modified Program teachers is just under the industry standards at the middle and high school levels. This indicates that the district has an adequate number of Modified Program classes and teachers to support the students in accessing these programs.

The district should consult its collective bargaining agreement to determine considerations for existing certified and classified employees who may be transferred or reassigned due to the relocation of a Modified Program class to a different school site. It should also complete Table 13 on the following page.

Table 13. 4-Step Consideration Process - Staffing Considerations

Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impact (Determine Estimate or Indicate N/A)
A. How would a Modified Program teacher’s preparation period and lunch be covered at [insert school name]? Note: Having more than one Modified Program class at a school allows teachers to cover each other’s preparation periods and lunches.		
B. What are the instructional assistant staffing implications if a Modified Program class is moved to [insert school name]?		
C. What are the impacts on itinerant service provider staffing for positions such as speech and language pathologists and occupational therapists if a Modified Program class is moved to [insert school name]? Note: Consider the impacts on a provider’s ability to group students. For example, students from several different Modified Program classes at one school may be seen together in a group, or a provider may enter a general education class to support students from different Modified Program classes that are grouped into the same general education class.		
D. What are the impacts on staffing for credentialed school nurses and other specialized health care providers if a Modified Program class is moved to [insert school name]?		
E. What are the impacts on staffing for adapted physical education teachers if a Modified Program class is moved to [insert school name]? Note: Adapted physical education teachers currently co-teach with general education physical education teachers at schools where the Modified Program classes are grouped.		
F. How would program supervisor support need to be adjusted at both the sending and receiving school if a Modified Program class is moved to [insert school name]?		
G. What is the capacity of [insert school name] to provide administrative support for a Modified Program class? Note: Consider areas such as serving as administrative designee at IEP meetings, student behavior support, staff support, and crisis support.		

Source: FCMAT.

Considerations for Placement of Classes in the Adult Transition Program

The district operates an adult transition program called Community Opportunities for Adult Students (COAST) for students with disabilities ages 18 to 22 who have participated in four years of high school but have not received a diploma. COAST Academy’s specialized curriculum focuses on areas such as independent living, career/vocational skills, recreation/leisure activities, and social, interpersonal and community connections. This individualized program is delivered in both special education and community-based settings.

In the 2023-24 fiscal year, the district had 4.4 FTE teachers and 44 students in the COAST Academy, as shown in Table 14 on the following page.

Table 14. Teacher Staffing, Student Caseload, and Average Caseload for the Adult Transition Program in 2023-24

School	Total Teacher FTE	Total Adult Transition Program Student Caseload	Average Caseload
COAST Academy at the Requeza Educational Center	4.4 FTE	44.0	10.0

Source: District-provided data.

The COAST Academy is co-located with Sunset High School, the district’s alternative high school, at the Requeza Educational Center. Staff stated that the Requeza Educational Center was designed to support the needs of COAST Academy students and that its location allows for community-based instruction and vocational opportunities due to its proximity to a public bus stop and walkable community-based settings. However, the COAST Academy is outgrowing its current space.

To evaluate alternative locations for one or more COAST Academy classes, the district could use the 4-Step Consideration Process outlined in the “Considerations for Modified Program Class Placement” section of this report. It would also benefit the district to consider whether one or more COAST Academy classes could be co-located at a community college campus. Staff reported a strong and positive relationship with the local community college and that some COAST Academy students are attending community college classes. Partnering with the local community college to co-locate one or more COAST Academy classes on that campus could increase students’ access to their nondisabled peers and provide additional opportunities for them to take college classes. It may also allow the district to develop worksites for students on the college campus.

Recommendations

The district should:

1. Use FCMAT’s 4-Step Consideration Process described in the narrative to evaluate the possible effects, including the one-time and ongoing costs and/or cost savings, of relocating a Modified Program class to a different school site.
2. Determine whether it can partner with a local community college to co-locate one or more of its COAST Academy classes on that campus.

Special Education Teacher Staffing

FCMAT compared the district’s special education teacher staffing to statewide guidelines and/or industry standards.

Special Education Teacher Support for Students Working Towards General Education Standards

The district does not use the term “resource specialist program,” but EC 56362(c) applies to its special education teachers who support students with mild-to-moderate service needs working towards general education standards. EC 56362(c) states:

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

In the 2023-24 fiscal year, the district had 52.07 FTE special education teachers supporting students with mild-to-moderate service needs. Based on caseload estimates provided by the district, these teachers managed the cases of 1,097 students, averaging 21.07 students per teacher, as shown in Table 15 below.

Table 15. Special Education Teacher Staffing for Students with Mild-to-Moderate Service Needs in 2023-24

School Level	Total Teacher FTE	Total Student Caseload	Average Teacher Caseload	Staffing Above (+) or Below (-) Education Code Standard
Middle School	17.60	397	22.56	+3.42
High School	34.47	700	20.31	+9.47
Total	52.07	1,097	21.07	+12.89

Sources: District-provided data and EC 56362(c).

Districtwide special education teacher staffing to support students with mild-to-moderate service needs (excluding those in the Seaside Program) is 12.89 FTE above what is required to meet the EC 56362(c) standard. However, FCMAT advises against reducing staffing because the standard outlined in EC 56362(c) is based on a maximum caseload, which is higher than the statewide caseload average observed in school districts that serve students using an inclusive model.

While the definition of an “inclusive model” varies across California’s school districts, the intent of this model is to enable students to attend their neighborhood schools, enroll and progress through the grade levels that match their chronological ages, and access general education classes and curriculums to the greatest extent possible. The district’s program is an inclusive model and requires current teacher staffing levels to adequately support its students’ needs.

The district also has a therapeutic program, called Seaside Prep, which supports students with social-emotional and behavioral needs in a small group special education setting as they work to meet general education standards. In the 2023-24 fiscal year, the district had 4.00 FTE teachers supporting this program. Based on caseload estimates provided by the district, these teachers managed 36 students, averaging 9.00 students per teacher, as shown in Table 16 on the following page. There is no established industry standard for this type of program.

Table 16. Special Education Teacher Staffing for the Seaside Prep Program in 2023-24

School Level	Total Teacher FTE	Total Student Caseload	Average Teacher Caseload
Middle School	1.00	10.00	10.00
High School	3.00	26.00	8.67
Total	4.00	36.00	9.00

Source: District-provided data.

Note: Seaside Prep's middle school program also has a 0.20 FTE teacher who provides coverage during the program teacher's preparation period. This FTE was excluded from the calculation because the teacher providing coverage does not have a caseload.

The district needs to continue to review caseload projections and student needs annually to determine if staffing adjustments for special education teachers supporting students working towards general education standards are necessary at any school level.

Staffing Guidelines and Industry Standard Caseloads for the Modified Program

The district operates noncategorical special education classes for students with moderate-to-severe support needs. The industry standard for these classes is a caseload of 10-12 students per teacher. Staff reported that, in alignment with this standard, the district uses a staffing guideline of 12 students per teacher for its Modified Program classes.

Special Education Teacher Support for Students in the Modified Program

In the 2023-24 fiscal year, the district had 14.80 FTE teachers leading Modified Program classes. Based on caseload estimates provided by the district, these teachers managed 145 students, averaging 9.80 students per teacher, as shown in Table 17 below.

Table 17. District's Special Education Teacher Staffing for the Modified Program in 2023-24

School Level	Total Teacher FTE	Total Student Caseload	Teacher Caseload Average	Industry Standard Caseload Range
Middle School	4.00	39.00	9.75	10-12 students per teacher
High School	6.40	62.00	9.69	10-12 students per teacher
Adult Transition Program	4.40	44.00	10.00	N/A
Total	14.80	145.00	9.80	10-12 students per teacher

Sources: District-provided data and industry standards.

Note: There is no established industry standard caseload range for special education teachers of adult transition programs.

The districtwide Modified Program caseload average of 9.80 students per teacher is just below the industry standard range of 10-12 students per teacher. The district needs to continue to annually review caseload projections and assess student needs to determine if staffing adjustments for special education teachers in the Modified Program are necessary at any school level.

Recommendation

The district should:

1. Continue to annually review caseload projections for special education teachers and assess student needs to determine if teacher staffing adjustments are necessary for any of its programs.

Instructional Assistant Staffing

Special education instructional assistants, also known as special education aides or paraeducators, are trained professionals who work with students, typically under the direction of a classroom teacher. School districts often employ special education instructional assistants under different titles with distinct job descriptions to perform functions such as specialized academic instruction, specialized medical support, behavioral support, and 1-to-1 student support or special circumstance instructional assistance (SCIA).

The district employs special education instructional assistants under three job descriptions. The distinguishing characteristics of each position are outlined below.

- **Instructional Assistant – Special Education:** The district’s job description states that this position:

Assists in providing instruction to students (1-on-1 or in groups) with learning disabilities or students who require a special education learning environment for a portion, or for all of, the students’ educational program. Positions in this class work with students having a variety of special education needs including disruptive behavioral problems that require an environment structured to control the behavior. Assignments may be to a classroom generally or may be dedicated to a specific student.

- **Instructional Aide – Special Education - Behavioral Intervention:** The district’s job description states that this position “primarily provides academic support to students with significant aggressive and/or other behavioral difficulties.”

- **Instructional/Personal Care Assistant – Special Education:** The district’s job description states that this position:

Assists teachers in providing instruction and care to students with physical disabilities and/or cognitive delays of sufficiently severe condition as identified in their Individualized Education Plan (IEP). These students frequently require assistance with basic bodily and physical functions such as toileting, diapering, suctioning of mouth and nose, tube feeding, and mobility/positioning. Incumbents may also provide instructional support to special education students in other special education learning environments.

Industry Standard Staffing Ratios

The industry standard base staffing for special day classes (SDCs) is to assign one instructional assistant for every teacher supporting students with mild-to-moderate and moderate-to-severe support needs. For SDCs supporting students with autism, the standard is two instructional assistants for every teacher. Additionally, the industry standard for staffing beyond the SDC base staffing level is determined by an adult-to-student ratio, as shown in Table 18 below.

Table 18. Industry Standard Instructional Assistant Staffing and Adult-to-Student Ratios

SDC Support Level	SDC Focus	Industry Standard Special Education Paraeducator Staffing	Adult-to-Student Ratio
Mild-to-Moderate	Noncategorical	1-2 six-hour special education aides depending on a class size of 12-15	1-to-7

Moderate-to-Severe	Noncategorical	1-2 six-hour special education aides depending on a class size of 10-12	1-to-5
All	Autism	2-4 six-hour special education aides depending on a class size of 8-10	1-to-3

Source: Industry standards.

Note: Industry standard staffing for special education instructional assistants is determined by class size to meet an adult-to-student ratio, which includes the classroom teacher and special education instructional assistant(s).

District Instructional Assistant Staffing Ratios

The district uses the adult-to-student ratios shown in Table 19 below to determine its instructional assistant staffing levels.

Table 19. District's Adult-to-Student Ratios Used for Instructional Assistant Staffing

Program	Adult-to-Student Staffing Ratio
Learning Academy	1-to-6
Seaside Program	1-to-5
Modified Program and COAST	1-to-3

Source: District-provided data.

The district's use of adult-to-student staffing ratios to determine instructional assistant staffing is a positive practice, and its ratios are generally in line with industry standards. The district's ratio of 1-to-6 for each Learning Academy is slightly lower than the industry standard of 1-to-7 for SDCs supporting students with mild-to-moderate disabilities. However, because the Learning Academy is not an SDC model and aims to promote the inclusion of students with disabilities, the use of a 1-to-6 ratio is reasonable. The Modified Program's ratio of 1-to-3 matches the industry standard ratio for SDCs serving students with autism, which is reasonable because the Modified Program supports students with a variety of disabilities, including autism. Staff reported, and district data supports, that a ratio of 1-to-4 or 1-to-5 is sometimes used for Modified Program classes, depending on student needs. This approach is appropriate because assigning more instructional assistant support than necessary is costly and may limit the opportunities of students with disabilities to gain independence.

1-to-1 Student Support

There is no established industry standard for special education aides providing 1-to-1 student support. Many districts throughout the state have taken steps to remove the designation of 1-to-1 support because it unintentionally reinforces the concept of one adult assigned to one student. Industry practice commonly refers to both the assessment process and the special education aide descriptive title as special circumstance instructional assistance (SCIA).

The district has 52 instructional assistants assigned to provide 1-to-1 student support; 46 are assigned to the Modified Program and six support the district's learning academies. While there is no industry standard for comparison, this is relatively high for a school district of this size compared to what is observed across the state. The district uses a SCIA process to assess whether a student requires intensive individual service, also known as 1-to-1 support from an instructional assistant. This process clarifies decision-making

procedures and recognizes that 1-to-1 support is a significant programmatic decision that should be based on a thorough, data-driven evaluation, considering all less restrictive alternatives.

The district's SCIA assessment aligns with industry standards because it focuses on personal independence, promotes individual decision-making, works to maximize existing supports, and is based on data-driven assessment. Staff reported that the SCIA is consistently used to determine the need for 1-to-1 instructional assistant support. However, they also indicated that an increasing number of students matriculating into the district have 1-to-1 support as a related service in their IEP. Staff identified resistance from parents as the main barrier to reducing or removing 1-to-1 support, regardless of whether this support is necessary or beneficial to the student.

Part of the SCIA assessment process should focus on planning for a student's transition to independence and developing annual IEP goals to support this. Staff reported that they consistently write goal(s) for independence when adding 1-to-1 instructional assistant support to a student's IEP. Each IEP team also meets at least twice a year to discuss the student's goals for independence and plan to reduce 1-to-1 instructional assistant support. This is a positive practice because it focuses IEP services on addressing deficit areas to strengthen skills, allows the team to monitor annual progress, and helps them determine whether adjustments to the level of service are needed. It also helps the IEP team move away from the concept of assigning one adult to one student, enabling the district to assign one special education instructional assistant to support several students when appropriate.

Recommendations

The district should:

1. Continue to use its adult-to-student ratios to assign instructional assistants to the special education program.
2. Continue using its SCIA assessment to determine the need for 1-to-1 instructional assistant support.
3. Continue to ensure that each IEP with 1-to-1 instructional assistant support, except for medically necessary support, contains goals for independence and a fade plan.

Related Service Provider Staffing and Caseloads

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

FCMAT analyzed staffing ratios for the district's adapted physical education (APE) teachers, occupational therapists, school nurses, school psychologists, and speech and language pathologists (SLPs). Staffing ratios for other related service providers were not analyzed because the district contracts for these services or there is no established industry standard. The industry standards for related service providers are listed in Table 20 below.

Table 20. Industry Standard Provider-to-Student Ratios

Provider Type	Industry Standard or Education Code Provider-to-Student Ratio
Psychologist	1-to-977
SLP (preschool)	1-to-40
SLP (ages five through 22)	1-to-55
APE Teacher	1-to-45-55
Physical Therapist	1-to-45-55
Occupational Therapist	1-to-45-55
Vision and Orientation and Mobility	1-to-10-30
Deaf and Hard of Hearing	1-to-15-25
Nurse	1-to-2,274

Sources: Industry standards, Education Code 56363.3, and Pupil Services Staff by Type (CDE).

Adapted Physical Education

In the 2023-24 fiscal year, the district had 1.6 FTE APE teacher positions managing a total caseload of 60 students receiving direct services, as shown in Table 21 below.

Table 21. District's Adapted Physical Education Teacher Staffing in 2023-24

Provider	Number of FTE	2023-24 Total Caseload	Caseload Average	Industry Standard Provider-to-Student Ratio	Staffing Above or Below Industry Standard
APE Teacher	1.6	60.0	37.5	1-to-45-55	0.27 FTE above 1-to-45 0.51 FTE above 1-to-55

Sources: District-provided data and industry standards.

Note: Only students receiving direct services from the district's APE teachers were included in the total caseload and related calculations.

The district is staffed at 0.51 FTE above the 1-to-55 ratio and 0.27 FTE above the 1-to-45 ratio of the industry standard provider-to-student ranges for APE teachers. The district needs to continue to annually review APE teacher caseload projections, assessment loads, the number of schools each APE teacher supports,

driving time between sites, direct and consultation service minutes, and student needs to determine if adjustments to APE teacher staffing are necessary.

Occupational Therapy

In the 2023-24 fiscal year, the district had 2.0 FTE occupational therapist positions, each managing an average caseload of 32 students receiving direct services, as shown in Table 22 below.

Table 22. District's Occupational Therapist Staffing in 2023-24

Provider	Number of FTE	2023-24 Total Caseload	Caseload Average	Industry Standard Provider-to-Student Ratio	Staffing Above or Below Industry Standard
Occupational Therapist	2.0	64.0	32.0	1-to-45-55	0.58 FTE above 1-to-45 0.84 FTE above 1-to-55

Sources: District-provided data and industry standards.

Note: Only students receiving direct services from the district's occupational therapists were included in the total caseload and related calculations.

The district is staffed at 0.84 FTE above the 1-to-55 ratio and 0.58 FTE above the 1-to-45 ratio of the industry standard provider-to-student ranges for occupational therapists. The district needs to continue to annually review occupational therapist caseload projections, assessment loads, the number of schools each occupational therapist supports, driving time between sites, direct and consultation service minutes, and student needs to determine if adjustments to occupational therapist staffing are necessary.

Credentialed School Nurses

In the 2023-24 fiscal year, the district had 2.0 FTE credentialed school nurses, each managing an average caseload of 6,182 students, as shown in Table 23 below.

Table 23. District's Credentialed School Nurse Staffing in 2023-24

Provider	Number of FTE	2023 Census Day Enrollment	Caseload Average	Industry Standard Provider-to-Student Ratio	Staffing Above (+) or Below (-) Industry Standard
School Nurses	2.00	12,364	6,182.00	1-to-2,274	-3.44 FTE

Sources: Pupil Services Staff by Type (CDE), district-provided data, and Enrollment for Charter and Non-Charter Schools - San Dieguito Union High School (CDE).

The district is staffed at 3.44 FTE below the industry standard for credentialed school nurses. Staff indicated that recruiting additional credentialed school nurses has been difficult, so the district created a student health care specialist position, a classified role requiring a licensed vocational nurse (LVN) or registered nurse (RN) certification. The district has five student health care specialists, but staff explained recruitment for this position has been difficult due to a shortage of qualified candidates.

The district's use of student health care specialists to perform nursing-related duties within their scope of practice may allow it to function adequately without the industry-standard number of credentialed school nurses. However, the district needs to review district enrollment, special education enrollment, duties performed by credentialed school nurses and student health care specialists, schoolwide needs, and student

needs to determine if increasing credentialed school nurse staffing to better align with industry standards would improve service to students.

School Psychologists

In the 2023-24 fiscal year, the district had 13.60 FTE school psychologists, each managing an average caseload of 909.12 students, as shown below in Table 24. The district also had 3.0 FTE school psychologists who exclusively provide educationally related mental health services. Because these psychologists do not serve in the comprehensive role of the school psychologist and do not perform psychoeducational assessments, they were not included in this staffing comparison.

Table 24. District's School Psychologist Staffing in 2023-24

Provider	Number of FTE	2023 Census Day Enrollment	Caseload Average	Industry Standard Provider-to-Student Ratio	Staffing Above (+) or Below (-) Industry Standard
School Psychologist	13.60	12,364	909.12	1-to-977	+0.95 FTE

Sources: District-provided data, Pupil Services Staff by Type (CDE), and Enrollment for Charter and Non-Charter Schools - San Dieguito Union High School (CDE).

Note: The district's 3.0 FTE school psychologists who exclusively provide educationally related mental health services were not included in this staffing comparison.

In the 2023-24 fiscal year, the district was staffed at 0.95 FTE above the industry standard for school psychologists. However, for the 2024-25 fiscal year, staff reported the district will have 12.60 FTE school psychologists because 1.00 FTE of the current school psychologist staffing is funded through Elementary and Secondary School Emergency Relief (ESSER III) funds. These funds were allocated to LEAs to address the impact of COVID-19 and must be fully expended by September 30, 2024. If census day enrollment remains at 12,364 in 2024-25, the 12.60 FTE school psychologists will manage an average caseload of 981.27 students, placing the district at 0.05 FTE below the industry standard for school psychologists. Consequently, it would benefit the district to review the following factors:

- The number of initial psychoeducational assessments in the current school year.
- The number of annual and triennial psychoeducational assessments expected next school year.
- The number of early reassessments expected next school year
- The number of specialized programs in the district.
- Total student enrollment.
- Special education enrollment.
- Individual site needs.

This review will help the district determine if adjustments to school psychologist staffing are necessary.

Speech and Language Pathologists

Education Code 56363.3 establishes the maximum caseload for SLPs serving students ages five to 22 at 55 students.

In the 2023-24 fiscal year, the district had 10.2 FTE SLPs, each managing an average caseload of 55 students receiving a direct service, as shown in Table 25 below.

Table 25. District's Speech and Language Pathologist Staffing in 2023-24

Provider	Number of FTE	2023-24 Total Caseload	Caseload Average	Education Code Standard Provider-to-Student Ratio	Staffing Above (+) or Below (-) Industry Standard
Speech and Language Pathologist	10.2	561	55	1-to-55	At Industry Standard

Sources: District-provided data and EC 56363.3.

Note: Only students receiving direct services from an SLP were included in the caseload average for comparison with the industry standard.

The district was staffed at the industry standard for SLPs in 2023-24. However, in 2024-25, staff reported the district will have 10.0 FTE SLPs because 0.20 FTE of the current staffing is funded through ESSER III funding. The district should review SLP caseload projections, assessment loads, the number of schools each SLP supports, the driving time between sites, direct and consultation service minutes, and student needs to determine if adjustments to SLP staffing are necessary.

Recommendations

The district should:

1. Continue to regularly analyze whether all related service provider staffing ratios are aligned with current laws and industry standards and are adequate to meet student needs.
2. Review district enrollment, special education enrollment, duties performed by credentialed school nurses and student health care specialists, schoolwide needs, and student needs to determine if increasing credentialed school nurse staffing to better align with industry standards would improve service to students.
3. Assess the adequacy of its 2024-25 staffing for school psychologists and SLPs.

Cost of Due Process, Mediation and Settlements

The IDEA and EC 56500.3 require school districts to implement all procedural safeguards for children with exceptional needs. These procedures provide a structured framework to resolve disputes related to the identification, assessment, educational placement, or the provision of a FAPE at the lowest level. Special education is a highly litigated area, with the primary basis of litigation centered on disputes over providing a FAPE.

FCMAT reviewed five decisions from the Office of Administrative Hearings (OAH) involving the district over the last three years. At the time of FCMAT’s visit, the district had five filings on OAH’s calendar, all of which have since been cancelled or settled through a prehearing conference or mediation within 118 days of the filing. These OAH decisions, cancellations and settlements indicate that the district is very successful in defending its educational assessments and processes to offer a FAPE. The court supported the district’s actions 86% of the time, and there was no prevailing party 2% of the time.

Staff reported that one-time alternative dispute resolution funds and learning loss funds were used to augment funding between 2020-21 and 2023-24 to settle outstanding cases and provide training and supplemental student support.

Staff also reported that the Business Services Department annually develops a budget for legal fees and settlement costs based on historical data and information from the Special Education Department regarding the number of open formal and informal complaints. These budget amounts are reviewed at the interim reporting periods and adjusted as needed. While most informal complaints are settled by offering compensatory services, the cost of those services is not tracked separately in the standardized account code system (SACS) account code structure and therefore is not known. Staff indicated that compensatory service costs have not historically been tracked in the district. Tracking these settlement costs would allow the district to analyze the data and identify trends.

The district’s legal fees and settlement payments are generally not paid from special education funds unless they are related to a student placement. The district’s special education legal and settlement expenses over the last three years are shown in Table 26 below. Between 2021-22 and 2023-24, the district’s legal fees increased by \$112,650 and its settlement payments increased by \$99,958.

Table 26. District’s Special Education Legal and Settlement Expenses from 2021-22 – 2023-24

Expense	2021-22	2022-23	2023-24
Legal Fees	\$432,266	\$474,733	\$544,916
Settlement Payments	\$413,577	\$453,173	\$513,535

Source: District-reported data.

Note: The “2023-24” data is as of June 30, 2024.

Settlement payments do not include the cost of compensatory education services.

Recommendation

The district should:

1. Track compensatory education service costs related to settlements separately in the SACS account code structure.

Nonpublic School Placement Trend

Education Code 56034 defines an NPS as “a private, nonsectarian school that enrolls individuals with exceptional needs pursuant to an individualized education program and is certified by the department.” An NPS is an educational option for students with disabilities who require a specialized educational program that is unavailable within their school district.

FCMAT compared the percentage of the district’s total student population enrolled in an NPS to that of other high school districts in San Diego County with more than 9,000 students (Escondido Union High School District, Grossmont Union High School District and Sweetwater Union High School District), as shown below in Figure 6.

Comparison of San Dieguito’s Nonpublic School Enrollment to the Combined Average of Similar-Sized San Diego County School Districts, 2018-19 – 2022-23

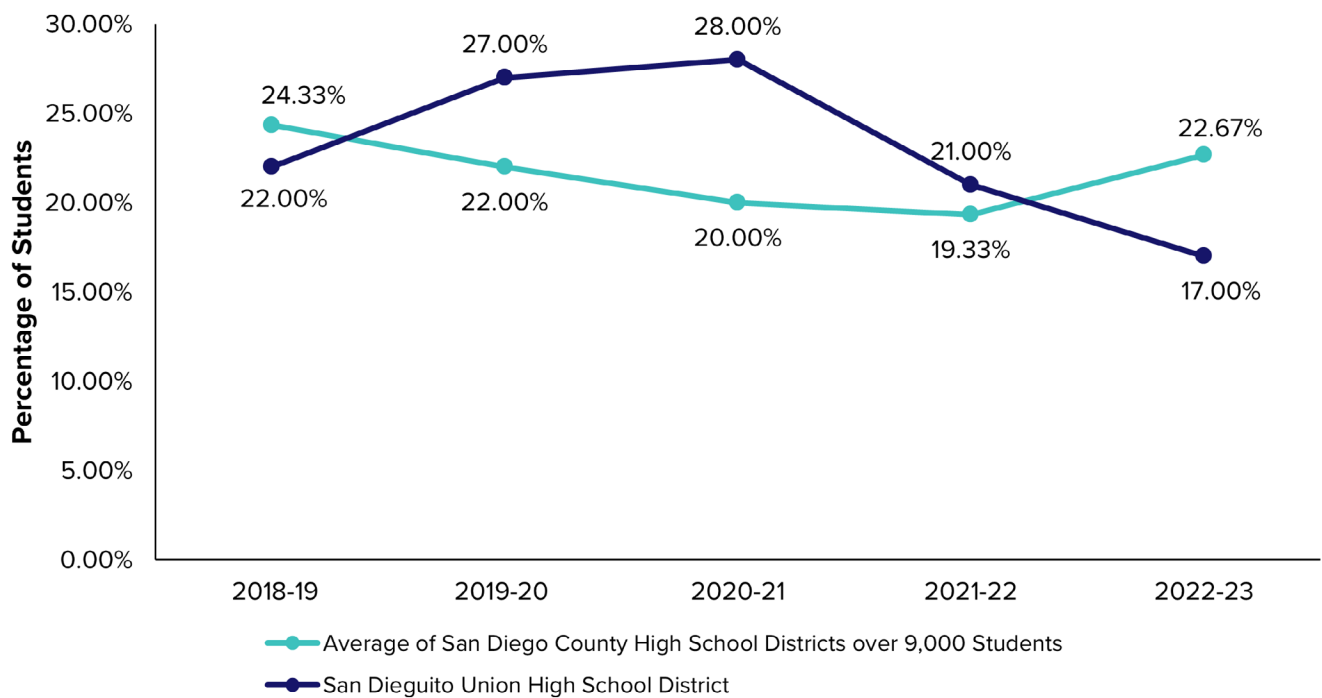


Figure 6. A graph showing NPS enrollment as a percentage of total district enrollment.

Source: Census Day Enrollment by School Type (Ed-Data).

Compared to 2018-19, the district now serves a higher percentage of students with an IEP in district programs rather than through NPSs. In 2022-23, the district served a higher percentage of students with IEPs in a district programs, as opposed to NPSs, than other San Diego County high school districts that each serve more than 9,000 students.

School districts receive LCFF funding for students attending NPSs based on each student’s annual rate of average daily attendance (ADA). In the district, the number of ADA served through an NPS has declined, while the estimated cost per student has significantly increased over the last several years, as shown in Table 27 on the following page.

Table 27. Enrollment, Funded ADA and Cost Per ADA for District Students Attending an NPS, 2021-22 — 2023-24

	2021-22	2022-23	2023-24
Census Day NPS Enrollment	27.00	22.00	23.00
Funded Annual NPS ADA	28.60	19.98	23.22
Cost Per ADA for Students Attending an NPS	\$85,874.00	\$115,297.00	\$131,147.00

Sources: San Dieguito Union High Census Day Enrollment by School Type (Ed-Data), LCFF Principal Apportionment School District ADA (CDE), and district-provided data.

Note: Actual expense data for 2023-24 was available only for a partial year, so expenses were extrapolated using historical first interim expenses to total annual expense ratios from 2021-22 and 2022-23.

Over the last three years, the district's NPS ADA decreased by 19%, while NPS expenses increased by 53%. Although the district is serving fewer students in an NPS setting — a positive trend — the cost per student has increased significantly. The cost of these NPS placements and services is increasing at rates that far exceed income. An analysis of individual monthly NPS payments indicates that several students are on track to exceed \$120,000 per year in NPS expenses.

It would benefit the district to work with the North Coastal Consortium for Special Education SELPA to conduct a cost-per-student analysis, which is required to identify and support the annual filing for extraordinary cost pool reimbursement for NPS/LCI and mental health services under EC 56836.21. The Special Education Extraordinary Cost Pool for NPS/LCI is ongoing state funding that was increased by almost 700% in 2022-23. The threshold amount for 2022-23 was \$90,504.67 for a single placement and services. It appears that the cost of services for several students may exceed that amount and qualify for full or partial reimbursement based on state funding availability.

Recommendation

The district should:

1. Work with the North Coastal Consortium for Special Education SELPA to determine if any student's placement in an NPS or LCI qualifies for reimbursement from the CDE's Special Education Extraordinary Cost Pool for NPS/LCI.

School Transportation

Context – School Transportation Funding

Historically, school transportation has been one of the most poorly funded areas within California’s education budget. Before 1977, school transportation was fully funded. School districts reported their operational costs and were fully reimbursed in the subsequent school year. However, after the adoption of Proposition 13, the state began reducing the percentage of reimbursement for school transportation. By 1982-83, school districts were reimbursed at 80% of their reported costs, and the state imposed a cap, limiting reimbursements to the costs reported by school districts in that particular year.

Between 1982-83 and 2012-13, costs rose significantly, cost-of-living adjustments (COLAs) were only occasionally granted, demographics underwent changes, and the demand for special education transportation surged dramatically. The subsequent economic downturn during the great recession, beginning in 2007 and lasting several years, prompted the state to reduce all categorical programs, including school transportation, by approximately 20%.

In the 2013-14 fiscal year, California adopted the LCFF. Under this formula, school transportation funding was allocated as an add-on to each district’s base grant. This funding must be spent on school transportation expenses, and districts must meet a maintenance of effort requirement, ensuring that they spend at least the amount received to maintain the same level of funding.

The Budget Act of 2022 increased school transportation funding. Starting in the 2022-23 fiscal year, school transportation funding is equal to 60% of the prior year’s student transportation expenditures reported in Function 3600. The LCFF transportation funding is part of this new allocation.

In addition, the Budget Act of 2022’s trailer bill language reinstated school transportation data collection and required each California school district to adopt a Transportation Services Plan by April 1, 2023, outlining how it will provide student transportation to unduplicated⁶ students. The district developed and adopted a plan as required, allowing it to receive school transportation funding equal to 60% of the prior year’s student transportation expenditures reported in Function 3600. Future Transportation Services Plans can cover multiple years.

District School Transportation Funding

Since the inception of the LCFF, the district has received \$556,202 for school transportation. Its 2022-23 unaudited actuals financial report shows that \$7,570,347 was spent on school transportation. The district reported capital expenses of \$3,632,422 in 2022-23, reducing its eligible transportation-related expenses for reimbursement to \$3,937,925. Sixty percent of the district’s eligible school transportation expenditures is \$2,362,755. Consequently, the district will receive an additional \$1,806,533 in school transportation funding for the 2023-24 fiscal year, which is a significant increase in funding.

⁶Students who are foster youth, eligible for free or reduced-priced meals, or identified as English learners. Each eligible student is counted only once, even if they meet more than one of these criteria

District School Transportation Costs

Transportation Cost Per Route

As discussed previously, the district spent \$7,570,347 on school transportation in 2022-23. After excluding expenditures for bus purchases and contracts with external transportation providers, the district spent \$106,266 per bus route. This cost per route is comparable to figures commonly observed across the state. The district projects that it will spend \$4,921,100 on school transportation in 2023-24.

Transportation Cost Per Student

At the time of FCMAT's fieldwork, the district was projected to spend \$15,054 per student for school transportation in the 2023-24 fiscal year. Before the implementation of the LCFF in 2013, the CDE collected and published school transportation data. At that time, the average cost to transport a student enrolled in general education was approximately \$1,500 per year, while the cost for a student enrolled in special education was \$6,500 per year. Even accounting for the rise in costs since the inception of the LCFF, the district's average per-student cost is very high. Once the school transportation data required by the Budget Act of 2022 is published, the district can conduct a thorough comparison of recent per-student transportation costs.

The district contracts with external transportation providers HopSkipDrive and Sol Transportation. For the 2023-24 fiscal year, the district budgeted \$330,000 for these contractors to transport 24 students, 16 of whom are transported to locations outside the district's geographic boundary. The per-student transportation cost is \$20,625, which is higher than the district's per-student cost. Including some of these students on district-operated routes could significantly reduce these costs. This could be achieved if the district hires additional bus drivers or establishes two-tiered start and end times between its middle and high schools, as described in the "[Master Bell Schedule](#)" section of this report.

Expenses associated with external transportation contracts qualify for 60% state funding under the new law, because the district is tracking these expenses in Function 3600. Similarly, the district will receive 60% reimbursement for its four bus attendants because it is tracking these expenses under Function 3600. Staff reported that instructional assistants and health care professionals do not typically work as bus attendants to support special education students receiving transportation as a related service. However, if any non-Transportation Department personnel help on school buses in the future, the district should track these expenses under Function 3600 for reimbursement.

Further, staff reported that the district reimburses eight parents for mileage for transporting their students in lieu of receiving district-provided transportation services. The district pays for one round trip per school day of attendance, using a standard parent in-lieu transportation contract using the mileage rate set by the Internal Revenue Service. Use of these parent in-lieu transportation contracts increases efficiency.

The district does not have expenses from NPSs that are transporting district students.

Fuel for District Vehicles

School districts are exempt from federal and state excise taxes for diesel fuel, while gasoline is exempt from federal excise taxes. FCMAT reviewed recent fuel invoices and confirmed that the district was not charged excise taxes for fuel.

Recommendation

The district should:

1. Ensure that a portion of the FTE spent working as a bus attendant is assigned to Function 3600 when staff outside the Transportation Department support students on buses.

Routing and Scheduling

General Education Transportation Routes

In 2023-24, the district reported providing general education transportation to approximately 61 students at Torrey Pines and La Costa Canyon high schools on two routes using large coach-style buses. The district's general education buses average one run in the morning and one in the afternoon, resulting in an approximate load ratio of 30.5% per route. Achieving a higher load ratio on the district's larger buses is likely not possible because the district uses one bus for each high school requiring service.

In 2022-23, the Transportation Department reported providing transportation for approximately 1,300 field trips and athletic events. Staff indicated that district buses and staff performed 67.5% of these trips and events, which is an efficient use of in-house services.

Special Education Transportation Routes

In 2023-24 the district reported providing special education transportation to 144 students, which is approximately 10% of the students with an IEP. This percentage is typical of what is observed across the state, indicating that the district's IEP process is effective in determining whether transportation is required as a related service.

The district's special education bus routes have an average of eight students per bus, which is lower than the 10-12 student average observed in similarly-sized/operated programs. All 15 special education routes use school buses, and the district does not use any nonschool bus passenger vehicles. The Transportation Department cannot easily achieve a higher passenger ratio because of school start time requirements and the district's master bell schedule, which does not allow sufficient time between school start times for greater transportation routing efficiency. Staff also reported that the district operates a few midday special education routes to transport students home earlier than the regular release time.

Forty-four adult students attend COAST Academy in the northern part of the district. These students are transported on nine buses, two of which are fully dedicated to serving this program. The district could achieve minimal transportation savings by relocating one or more classes to the local community college campus, as discussed in the "[Considerations for Placement of Classes in the Adult Transition Program](#)" section of this report. However, the savings would be nominal because students are routed for transportation based on regional location rather than class type. Additionally, the district's master bell schedule makes it challenging to transport students to COAST Academy on fewer than nine buses.

In 2023-24, 24 students were transported to seven out-of-district program sites within San Diego County, as shown in Table 28 on the following page.

Table 28. Out-of-District Program Sites Requiring Transportation Service in 2023-24

School/Program	Program Location	Transportation Provider	Number of Students Transported
Community School	San Diego	San Dieguito Union	8
Terri Inc.	Oceanside	HopSkipDrive	4
New Haven	Vista	HopSkipDrive	3
North County Academy	Carlsbad	Sol Transportation	4
Sierra School	Poway	HopSkipDrive	1
Winston	San Diego	Sol Transportation	3
New Bridges	Poway	HopSkipDrive	1
Total			24

Source: District-reported data.

The district provides transportation for eight students who attend the Community School, while external providers transport the remaining 16 students who attend programs at six other sites. Four of these six programs have more than three district students attending. The district could route these students on district buses, achieving considerable savings, if additional time were provided between the start and end times of the district's schools or if additional bus drivers were hired to increase the number of district-operated routes.

School Bus Routing Software

The Transportation Department uses an industry-standard routing program called TransTraks, which includes modules for field trip scheduling and vehicle maintenance. TransTraks also offers an application for parents to check their children's bus arrival times. TransTraks is sufficient for the district's size and present needs.

Recommendations

The district should:

1. Determine if adjusting the start and end times for the COAST Academy could allow for more efficient routing of its students.
2. Consider performing a route optimization study for the entire transportation program.

Special Education Transportation Service

Transportation Decision Tree

It is a best practice to use a transportation decision tree when assessing a student's need for special education transportation as a related service. All staff members reported using a decision tree to evaluate the need for special education transportation. In 2023-24 the district reported providing special education transportation to 144 students, which is approximately 10% of the students with an IEP. This percentage is typical of what FCMAT has observed across the state, indicating that the district's IEP process is effective in determining whether transportation is required as a related service.

Parent Transportation Handbook

It is best practice to provide a special education school transportation handbook for parents. The district reported that it has not developed such a handbook. A comprehensive parent handbook that outlines the district's practices and procedures, along with contact information for key staff members, would be a useful resource for parents. It may also reduce the number of telephone calls to both the Transportation and Special Education departments.

Recommendations

The district should:

1. Continue the use of its transportation decision tree to help IEP teams evaluate whether a student requires special education transportation as a related service to receive a FAPE.
2. Develop a special education transportation handbook for parents.

Transportation Department Staffing

In the 2023-24 fiscal year, the district's Transportation Department includes the positions listed below in Table 29.

Table 29. District Transportation Department Positions and Full-Time Equivalent or Number of Staff in 2023-24

Job Title	FTE or Number of Staff
Director of Transportation	1.00 FTE
Transportation Operations Supervisor	1.00 FTE
Lead Vehicle Equipment Mechanic	1.00 FTE (Vacant)
Vehicle Equipment Mechanic	1.00 FTE
Vehicle Equipment Service Workers	2.00 FTE
Bus Driver Trainer	1.00 FTE (Vacant)
Bus Attendant	4 Staff
Administrative Assistant II	1.00 FTE
Transportation Router Scheduler	1.00 FTE
Dispatcher	2.00 FTE
Bus Driver	21 Staff

Source: District-reported data.

Note: The count of 21 bus driver staff members includes two flex drivers.

Staff reported that the district is actively recruiting a state-certified school bus instructor because none of the bus drivers have expressed interest in becoming certified.

Bus Driver Staffing and Scheduling

All the district's permanent routes and flex positions are filled. However, a consolidated number of bus routes are being operated, and the district is also contracting with two external transportation providers to meet student transportation needs. The district does not have substitute school bus drivers, so the two flex drivers cover for absent bus drivers. In addition, the router/scheduler, operations supervisor, and director of

transportation are all licensed school bus drivers. However, relying on one or more of these staff members to cover routes for absent bus drivers is a critical problem if it is on a routine basis.

The district guarantees its permanent school bus drivers 6-7 hours of daily work. Most of the district's bus driver contracts range from approximately six to eight hours daily, based on actual route time, pre- and post-trip inspections, and other related duties such as fueling vehicles or detailing buses, which are assigned to individual routes that bus drivers bid for annually. Moreover, bus drivers are paid for overtime or extra work when performing field trips and athletic trips. One of the dispatchers validates each bus driver's contracted time and any overtime or extra work for activity trips.

Vehicle Maintenance Staffing

The Transportation Department's vehicle maintenance team supports a large fleet of 54 school buses. In addition to school buses, the district maintains a fleet of 382 registered vehicles used for various district support services and as passenger vehicles. Department staff also reported that they maintain much of the district's grounds equipment. Compared to what is observed in similar-sized districts across the state, the Transportation Department is maintaining a relatively large fleet of vehicles.

School districts with a similar number of school buses and fleet vehicles typically have a vehicle maintenance and fleet supervisor position. However, San Dieguito does not have this position. Instead, the lead vehicle equipment mechanic and the director of transportation coordinate the vehicle maintenance program. Given the number of students the district serves, the size of its fleet, and the scope of its transportation program, the district would benefit from creating a vehicle maintenance and fleet supervisor position.

Recommendations

The district should:

1. Fill the vacant state-certified school bus driver instructor position.
2. Assess the need for a vehicle maintenance and fleet supervisor position.

Vehicle Maintenance, Fleet and Facilities

The Transportation Department performs maintenance for all district vehicles. Staff indicated that the Transportation Department invoices other departments for the parts and labor costs associated with performing maintenance and repairs on their vehicles.

Safety Compliance Report/Terminal Record Update

California regulations require all school buses to receive an annual inspection from the California Highway Patrol (CHP) Motor Carrier Safety Unit. Any problems must be repaired before placing the vehicle back into service. The CHP Motor Carrier Inspector Unit also inspects all vehicle maintenance records, driver on-duty records, driver timekeeping records, and federal drug and alcohol testing records. The unit produces a report of its findings entitled the "Safety Compliance Report/Terminal Record Update," commonly referred to as the CHP terminal grade. It is important to recognize that this grade is merely a snapshot in time and does not necessarily confirm adherence to the best practices and processes expected within a robust vehicle maintenance program.

The CHP Motor Carrier Safety Unit designates school districts as either “satisfactory” or “unsatisfactory” on the Safety Compliance Report/Terminal Record Update. A satisfactory designation is the highest grade awarded to any motor carrier and indicates that the carrier is generally in compliance with the laws and regulations governing school bus safety. Conversely, a grade of unsatisfactory indicates a serious deficiency or deficiencies. In such cases, the CHP clearly advises that failure to correct these deficiencies and may lead to severe consequences, including a recommendation to the Public Utilities Commission (PUC) to revoke the school district’s motor carrier operating authority, filing a complaint with the local district attorney for potential prosecution, and seeking an injunction. Failing to correct these issues may result in criminal charges against the school district’s superintendent and governing board.

The district earned grades of “satisfactory” on its most recent CHP terminal grade inspections in April of 2022 and 2023. Given the district’s satisfactory CHP terminal grades, the district is operating a safe and compliant school transportation program.

School Bus Safety Inspections

Title 13 of the California Code of Regulations, Section 1232 mandates that school buses be inspected every 45 days or 3,000 miles, whichever occurs first. FCMAT audited the district’s school bus inspection reports and school bus maintenance records and found that the 45-day, 3,000-mile inspections are being performed at the required intervals.

As the district begins to use electric vehicles, staff will need specialized training to maintain them. This is a challenge within the industry, with many school districts that have adopted electric school buses and vehicles report reporting a lack of training for maintenance personnel in managing these new systems.

Transportation Department Fleet and Facility

The district has a fleet of 54 school buses, many of which have been replaced over the past three years. The fleet now includes 20 new conventional-style school buses and three large transit school buses. New legislation requires that all new school buses in California be electric by 2035, with additional grant funding likely to support this transition. Staff reported that the district is already aggressively pursuing grants for electric vehicles and related infrastructure through various funding opportunities.

The district operates several vans and vehicles designed to transport small groups of students, driven by teachers and coaches. According to the California Vehicle Code, vehicles intended for nine passengers plus the driver (totaling 10) are permitted to transport no more than that specified number of students. Because these vehicles are used to transport students, they should adhere to the same maintenance standards as school buses. Staff reported that the district’s vans are maintained in a manner equal to that of its school buses. This proactive approach minimizes the district’s liability and ensures the safety of its students.

The district’s transportation facility is co-located with the San Dieguito High School Academy. The facility has adequate fleet parking capacity and space for electric bus and vehicle infrastructure, but it is aging, and the vehicle maintenance and general office areas are undersized. Overall, the district’s transportation facility appears to comply with general environment regulations applicable to industrial facilities. However, the district’s underground fueling infrastructure, which includes a 5,000-gallon unleaded fuel tank and a 12,500-gallon diesel fuel tank, is outdated and lacks double-wall protection. Staff reported there is a need to remove the old tanks and replace them with a new above-ground 10,000-gallon baffled tank for both unleaded and diesel fuel.

Recommendation

The district should:

1. Continue to pursue grants for electric vehicles and related infrastructure.

Driver Training and Safety

School Bus Driver Training

School bus driver training in California is highly regulated. Pursuant to EC 40080-40089, prospective school bus drivers are required to complete a minimum of 20 hours of classroom training and 20 hours of behind-the-wheel training, using a curriculum developed by the CDE's Office of School Transportation. Typically, classroom training takes approximately 35 hours to cover all the units, and behind-the-wheel training requires a similar amount of time. Furthermore, in accordance with EC 40084.5, school bus drivers must also complete at least 10 hours of annual in-service training.

All annual, classroom and behind-the-wheel training sessions must be conducted by a state-certified school bus driver instructor. Behind-the-wheel training may also be administered by a behind-the wheel-instructor, another classification of instructor allowed by law and certified by the CDE's Office of School Transportation. All training activities must be documented by a valid state-certified school bus driver instructor on the appropriate form. The district has one full time state-certified bus driver instructor position, which is vacant. The transportation director and operations supervisor are also certified instructors. The district meets the size requirements recommended by the CDE's Office of School Transportation and has a need for a dedicated position to manage bus driver training responsibilities. These include classroom training, behind-the-wheel training, renewal training, in-service training, and record maintenance.

Staff reported that the Transportation Department offers multiple opportunities for driver training. These include an orientation and an in-service program at the beginning of each school year, along with monthly in-service meetings. The district also offers an adequate number of renewal classes for drivers needing to meet re-certification requirements.

Title 13, Section 1229 of the California Code of Regulations mandates that every commercial driver must demonstrate proficiency for each type of vehicle before operating it on the road without supervision. The district adheres to this regulation with a robust safety and training program that ensures compliance.

School Bus Driver Requirements

School bus drivers are required to: (1) undergo a background check and fingerprinting for licensing and employment; (2) submit to drug and alcohol testing in compliance with US Department of Transportation rules; and (3) be enrolled in the California Department of Motor Vehicle's Employer Pull Notice (DMV-EPN) program in compliance with the California Vehicle Code.

The DMV-EPN program provides the district with an annual copy of the driver's record and updates upon any moving violation, citation, or accident. The district's driver instructor position registers school bus drivers for this program, and the district's passenger vehicle operators are also enrolled in this program. However, staff reported that teachers and coaches who transport students in district vans operate other district vehicles are not enrolled in the program. To maintain student safety and limit its liability, the district needs to enroll all employees who operate district vehicles, as well as volunteers who drive students, in the DMV-EPN program.

The district's Human Resources Department enrolls, monitors, and manages the district's compliance with the required drug and alcohol testing for commercial drivers. Enrollment in this district program is required for all school bus and commercial drivers. Federal regulations mandate that drivers undergo drug testing before employment, participate in random drug and/or alcohol testing, be tested after any accidents, and submit to testing when there is reasonable suspicion.

The district uses Class C drivers who transport students regularly as part of their employment. These drivers must be enrolled in a similar, but separate, non-Department of Transportation (non-DOT) drug and alcohol testing program in compliance with Vehicle Code 34520.3. This requirement does not extend to teachers or coaches because their primary job functions do not involve driving students.

Other Staff Training

A best practice is to provide training for teachers and coaches who use district vans to transport students. Staff reported that these staff receive such training using a curriculum provided by the district's joint powers authority.

District Transportation Safety Plan

Education Code 39831.3 requires school districts to develop transportation safety plans outlining the procedures employees must follow to ensure student safety. These plans must include protocols to prevent students from being left unattended on a school bus. Additionally, each school must keep a copy of its transportation safety plan on-site for review by California Highway Patrol officers. It is best practice to review and revise these plans annually and whenever necessary.

The district has adopted a transportation safety plan in accordance with EC 39831.3, which includes bus checking procedures. A copy of this plan is maintained on-site at each district school.

Safety Drills

Education Code 39831.5 requires school districts to conduct school bus emergency evacuation drills annually. It also mandates school districts to maintain specific records for students in transitional kindergarten through grade eight who ride school buses and to announce specific safety information before every field trip.

Staff reported that the Transportation Department has completed and documented the necessary drills needed to fulfill the 2023-24 annual requirement.

Recommendations

The district should:

1. Continue to enroll all staff who operate district vehicles in a similar, but separate non-DOT drug and alcohol testing program.
2. Enroll all staff who operate district vehicles and volunteers who transport students in the DMV-EPN program.

Appendices

Appendix A – Considerations for Modified Program Placement Tool

Appendix B – Study Agreement

Appendix A – FCMAT Considerations for Modified Program Placement Tool

Instructions

Follow the four steps outlined in the FCMAT Considerations for Modified Program Placement Process below to use the FCMAT Considerations for Modified Program Placement Tool.

FCMAT Considerations for Modified Program Placement Process

Step 1: Collect Data

To establish enrollment patterns and school transportation use trends, compile five years of data for students in the Modified Program, including at least the following information:

- Student’s school of attendance.
- Student’s home school.
- Whether transportation was provided for the student as a necessary related service.
- Whether transportation was provided because the student was not attending their home school.

This enrollment and school transportation data will be used in steps 2 and 3 of the consideration process.

Step 2: Assess LRE Access

The term “least restrictive environment” refers to the principle that students with disabilities should be educated alongside their nondisabled peers as much as possible. The goal is to provide an appropriate education while minimizing restrictions. Ideally, students in the Modified Program would attend their neighborhood school middle and high schools alongside the nondisabled peers they attended elementary school with, as well as other students from their neighborhood.

To determine the most suitable school site without a Modified Program class from a least restrictive environment (LRE) perspective, complete the corresponding section of the tool on page 52 for each school site under consideration. To complete the tool, follow these steps:

1. Review each “starting question.”
2. Identify the sources of qualitative and quantitative data that best answer each starting question. While certain starting questions have suggested data sources, the district should consider additional data sources as well.
3. Determine the possible fiscal impacts, including one-time versus ongoing costs and increased costs versus cost savings.

Use this data to identify which school site(s) currently without a Modified Program class to evaluate further in Step 3 of the consideration process.

Step 3: Review Program Resources

To evaluate additional factors for each school site being considered to receive a Modified Program class, complete the “Programmatic Considerations,” “Facility Considerations,” “Specialized Equipment and Curriculum Considerations,” and “Transportation Considerations” sections of the tool on pages 52-54. Once these sections are completed, proceed to Step 4.

Step 4: Determine Staffing Needs

Complete the “Staffing Considerations” section of the tool on page 54. School districts are encouraged to compare their staffing levels against industry standards to determine if they have an adequate number of Modified Program classes and teachers to support students in accessing these programs. It is also recommended that school districts consult their collective bargaining agreements to determine considerations for existing certified and classified employees who may be transferred or reassigned due to the relocation of a Modified Program class to a different school site.

FCMAT Considerations for Modified Program Placement Tool

Least Restrictive Environment Considerations		
Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impacts (Determine Estimate or Indicate N/A)
A. How many students in the Modified Program would have been able to attend their home school over the past five school years if the program had been located at [insert school name]?	Review data compiled in Step 1 of the consideration process.	
B. How many students in the Modified Program would have lost access to their home school over the past five school years if the program had been located at [insert school name]? Note: To balance the Modified Program classes at different schools due to student numbers and/or individual student needs, certain students may not be able to attend a class at their home school.	Review data compiled in Step 1 of the consideration process.	
C. Does [insert school name] have other specialized programs such as the Seaside Prep Program?		
D. What is the number and percentage of students in special education schoolwide at [insert school name]? Note: Ideally, the different school sites in the district should have approximately the same percentage of students enrolled in special education.		
Programmatic Considerations		
Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impact (Determine Estimate or Indicate N/A)
A. Does [insert school name] have a block schedule or a traditional schedule?		
B. Does [insert school name]’s schedule offer adequate opportunities for students in the Modified Program to take elective or other general education classes?		
C. What training would staff at [insert school name] need to support students in the Modified Program? Note: Consider topics such as disability awareness, differentiation, accommodations and modifications, nonviolent crisis intervention, and universal design for learning.		

Programmatic Considerations		
Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impact (Determine Estimate or Indicate N/A)
D. Does [insert school name] have the capacity to provide adequate options for the inclusion of students in the Modified Program in nonacademic programs? Note: Consider areas such as extracurricular activities, athletics, and clubs.		
E. Does the programming at [insert school name] allow for a functional continuation of the current individualized education programs (IEPs) of all students who would be moving schools? Note: Certain aspects of student IEPs may need to be modified, such as the percentage of time in general education.		
Facility Considerations		
Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impact (Determine Estimate or Indicate N/A)
A. Does [insert school name] have classroom space available that is appropriate to meet the needs of students in the Modified Program? Note: Consider classroom size, Americans with Disabilities Act accessibility, restroom space allowing for specialized equipment and changing tables, and space for activities and equipment (e.g., stoves, washers, dryers) to support the development of independent living skills.		
B. How would the identified classroom space at [insert school name] need to be retrofitted to support independent living skill-building activities? Note: Consider the potential modifications needed for infrastructure and the equipment that may need to be purchased, such as washers, dryers, stoves, or refrigerators.		
C. Does [insert school name] have a designated room that can be used to support dysregulated students? If so, can this room support students from the Modified Program, or would another space need to be designated?		
D. Would any part of [insert school name]'s campus need to be altered to make it accessible to and usable by students in the Modified Program? Note: Consider nonclassroom spaces that students may require access to.		
Specialized Equipment and Curriculum Considerations		
Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impact (Determine Estimate or Indicate N/A)
A. What specialized equipment shared among the Modified Program classes at a school site would need to be purchased for a Modified Program class at [insert school name]? Note: Consider equipment such as a Hoyer Lift.		
B. What materials currently shared among the Modified Program classes at a school site would need to be purchased for a Modified Program class at [insert school name]? Note: Consider both low-tech and high-tech items such as curriculum materials, items supporting sensory regulation needs, and tools for activities that support independent living skills.		

Transportation Considerations		
Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impact (Determine Estimate or Indicate N/A)
A. If a Modified Program class were moved to [insert school name], how many of the students in that class would receive transportation as a necessary related service?	Review data compiled in Step 1 of the consideration process.	
B. If a Modified Program class were moved to [insert school name], how many of the students in that class would no longer receive transportation because they are now attending their home school? Note: This only applies to students who do not receive transportation as a necessary related service.	Review data compiled in Step 1 of the consideration process.	
C. How would moving a Modified Program class to [insert school name] impact the overall efficiency of the district's school transportation program? Note: Consider factors such as the number of special education bus routes, the number of students per route, and the number of bus drivers needed. The way master bell times are staggered between the schools may also impact efficiency and the number of bus routes required.		
D. How would moving a Modified Program class to [insert school name] impact the amount of time students in the Modified Program spend on the bus during each run?		
Staffing Considerations		
Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impact (Determine Estimate or Indicate N/A)
A. How would a Modified Program teacher's preparation period and lunch be covered at [insert school name]? Note: Having more than one Modified Program class at a school allows teachers to cover each other's preparation periods and lunches.		
B. What are the instructional assistant staffing implications if a Modified Program class is moved to [insert school name]?		
C. What are the impacts on itinerant service provider staffing for positions such as speech and language pathologists and occupational therapists if a Modified Program class is moved to [insert school name]? Note: Consider the impacts on a provider's ability to group students. For example, students from several different Modified Program classes at one school may be seen together in a group, or a provider may enter a general education class to support students from different Modified Program classes that are grouped into the same general education class.		
D. What are the impacts on staffing for credentialed school nurses and other specialized health care providers if a Modified Program class is moved to [insert school name]?		
E. What are the impacts on staffing for adapted physical education teachers if a Modified Program class is moved to [insert school name]? Note: Adapted physical education teachers currently co-teach with general education physical education teachers at schools where the Modified Program classes are grouped.		
F. How would program supervisor support need to be adjusted at both the sending and receiving school if a Modified Program class is moved to [insert school name]?		
Staffing Considerations		

Starting Questions	Data Sources (Qualitative and Quantitative)	Fiscal Impact (Determine Estimate or Indicate N/A)
<p>G. What is the capacity of [insert school name] to provide administrative support for a Modified Program class? Note: Consider areas such as serving as administrative designee at IEP meetings, student behavior support, staff support, and crisis support.</p>		

Source: FCMAT.

Appendix B – Study Agreement

FCMAT

FISCAL CRISIS & MANAGEMENT
ASSISTANCE TEAM

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM STUDY AGREEMENT FOR MANAGEMENT ASSISTANCE

This study agreement, hereinafter referred to as Agreement, is made and entered into by and between the Fiscal Crisis and Management Assistance Team, hereinafter referred to as the Team or FCMAT, and the San Dieguito Union High School District, hereinafter referred to as the Client; collectively, FCMAT and Client are hereinafter referred to as the Parties. This Agreement shall become effective from the date of execution hereof by FCMAT.

1. BASIS OF AGREEMENT

FCMAT provides a variety of services to local education agencies (LEAs) as authorized by Education Code (EC) 42127.8(d). The Client has requested that the FCMAT assign professionals to study specific aspects of the Client's operations. The professionals will include FCMAT staff and may include professionals from county offices of education, school districts, charter schools, community colleges, other public agencies or private contractors. All professionals assigned shall work under the direction of FCMAT. All work shall be performed in accordance with the terms and conditions of this Agreement.

FCMAT will notify the Client's county superintendent of schools of this Agreement.

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

1. Analyze special education teacher staffing ratios, class sizes and caseloads using statutory requirements for mandated services and statewide guidelines, and make recommendations for improvement, if any.
2. Review the efficiency of staffing allocations of special education paraeducators, per Education Code requirements and/or industry standards, and make recommendations for improvement, if any. Review the procedures for identifying the need for paraeducators, including considerations related to the least restrictive environment and the processes for monitoring the assignment of paraeducators and determining the need for continued support from year to year (including classroom and 1-to-1 paraeducators).
3. Analyze staffing and caseloads for related service providers, including but not limited to speech pathologists, psychologists, occupational/physical therapists, adaptive physical education teachers and other staff who may be related service providers, and make recommendations for improvement, if any.
4. Analyze whether the district provides a continuum of special education and related services for students in preschool through age 22, including their placement in the least restrictive environments, and make recommendations for improvement (which may include instructional models), if any.

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5. Review the Special Education Department's organizational structure and staffing within the district's central office to determine whether its administration, clerical and administrative support, program specialists, teachers on special assignment and overall function are aligned with those of districts of comparable size and structure, and make recommendations for greater efficiencies, if any.
6. Review the costs of due processes, mediations and settlements for the past three years and make recommendations for improvements, if any.
7. Review the district's nonpublic school and residential treatment center placement trend for the cost per student for the last three years and make recommendations for improvement, if any.
8. Recommend a process for the district to determine the placement of moderate/severe service programs within the district.
9. Review special education transportation for efficiency and effectiveness, and provide recommendations for potential cost saving measures, if any. The review will include but not be limited to the role of individualized education programs, routing, scheduling, operations and staffing.
10. The Team will present the final report to the district's board of trustees at a public meeting following the completion of the review.

B. Services and Products to be Provided

1. Orientation Meeting

The Team will conduct an orientation session at the Client's location to brief the Client's management and supervisory personnel on the Team's procedures and the purpose and schedule of the study. This orientation meeting is normally held at the beginning of fieldwork for the study.

2. Fieldwork

The Team will conduct fieldwork at the Client's office and/or school site(s), or other locations as needed. Limited fieldwork may also be conducted remotely via telephone or videoconferencing services, in addition to the Public Safety Considerations outlined in Section 13 below.

3. Exit Meeting

The Team will hold an exit meeting at the conclusion of the fieldwork to inform the Client of the status of the study. The exit meeting will include a review of the scope of work; outstanding items, including documents, data and interviews not yet received or held; and the estimated timeline for a draft report. The meeting will not memorialize details regarding findings because the Team's conclusions may change after a complete analysis is finished. Exceptions to this will be findings of immediate health and safety concerns for students or staff, and other time-sensitive items that include the potential for risk or exposure to loss.

4. **Exit Letter**
Approximately 10 business days after the exit meeting, the Team will issue an exit letter briefly memorializing the topics discussed in the exit meeting.
5. **Draft Report**
An electronic copy of a preliminary draft report will be delivered to the Client's point of contact identified below for review and comment.
6. **Final Report**
An electronic copy of the final report will be delivered to the Client's point of contact and to the Client's county superintendent of schools following completion of the study. FCMAT's work products are public and all final reports are published on the FCMAT website.
7. **Board Presentation**
Presentations to the Client's board are optional and are made at the request of the Client. If a board presentation is requested, it will be noted in the scope and objectives of the study or can be added as a change in scope at a later date.
8. **Follow-Up Review**
If requested by the Client within six to 12 months after completion of the study, FCMAT, at no additional cost, will assess the Client's progress in implementing the recommendations included in the report. This follow-up support is primarily a document review-based study. Progress in implementing the recommendations will be documented to the Client in a FCMAT management letter. FCMAT will work with the Client on a mutually convenient time to return for follow-up support that is no sooner than eight months and no later than 18 months after the date of the final report.

3. **PROJECT PERSONNEL**

The personnel assigned to the study will be led by a FCMAT staff person (job lead) and will include at least one other professional. FCMAT will notify the Client of the assigned personnel when the fully executed copy of this Agreement is returned to the Client.

FCMAT will communicate to the Client any changes in assigned project personnel.

4. **PROJECT COSTS**

The cost for studies requested pursuant to EC 42127.8(d)(1) and 84041 shall be as follows:

- A. \$1,100 per day for each FCMAT staff member while on site conducting fieldwork. The cost of independent FCMAT consultants will be billed at their daily rate for all work performed. On-site is defined as either 1) physically at the Client's office or school site(s), or 2) in a scheduled virtual meeting with the Client's personnel, representatives or others associated with the scope of work pursuant to Section 13 below.
- B. All out-of-pocket expenses, including travel and its associated costs, and miscellaneous items necessary to complete the scope and objectives of the study.

- C. The applicable indirect rate at the time work is performed on the study will be added to all costs billed.
- D. The Client will be invoiced for 50% of the not-to-exceed cost shown below following completion of fieldwork (progress payment) and the remaining amount shall be due upon the issuance of the final report or presentation to the Client's board, whichever is later (final payment). The Parties agree that changes documented in a revised study agreement may change the original not-to-exceed amount shown below. If changes are made before or during fieldwork, the new not-to-exceed amount documented in such a revised study agreement will constitute the basis for the progress payment. If changes are made after fieldwork, 100% of the total changed value documented in a revised study agreement, less progress payments made, will constitute the final payment due. All payments shall be due immediately based on the terms of the invoice.

Based on the scope and objectives of the study, the total not-to-exceed cost of the study will be \$35,000.

- E. Any change to the scope of work will affect the total cost. Changes may include, but are not limited to, delays, revisions to the scope of services, and substitution or addition of personnel. The need for changes shall be communicated by FCMAT to the Client in advance in the form of a revised study agreement.

Payments for FCMAT's services are payable to Kern County Superintendent of Schools, Administrative Agent, 1300 17th Street, City Centre, Bakersfield, CA 93301.

5. RESPONSIBILITIES OF THE CLIENT

- A. Return current organizational chart(s) that show the Client's management and staffing structure with the signed copy of this Agreement. Organizational charts should be relevant to the scope of this Agreement.
- B. Provide private office or conference room space for the Team's use during fieldwork.
- C. Provide for a Client employee to upload all requested documents and data to FCMAT's online SharePoint repository per FCMAT's instructions. Provide FCMAT with the name and email of the person who will be responsible for collecting and uploading documents requested by FCMAT with the signed copy of this Agreement.
- D. Provide documents and data requested on the Team's initial and supplementary document request list(s) by the date requested.

All documents and data provided shall be responsive to FCMAT's request, in quality condition, readable and in a usable form. With few exceptions, documents and data requested are public records and records maintained by LEAs in the routine course of doing business. Some data requested may require exporting LEA financial system reports to Microsoft Excel or another usable format agreed to by FCMAT.

All documents shall be provided to FCMAT in electronic format, labeled as instructed by FCMAT. Upon approval of this Agreement, access will be provided to FCMAT’s online SharePoint repository, to which the Client will upload all requested documents and data.

- E. Ensure appropriate senior-level staff are available for the orientation and exit meetings.
- F. Facilitate access to requested board members, officers and staff for interviews.
- G. Facilitate access to requested information and facilities to include, but not be limited to, files, sites, classrooms and operational areas for observation.
- H. Review a draft of the report and return it to FCMAT by the date FCMAT requests with any comments regarding the accuracy of the report’s data or the practicability of its recommendations. The Team will review this feedback in a timely manner and make any adjustments it deems necessary before issuing the final report.
- I. Return the requested evaluation survey to FCMAT as described below.

6. PROJECT SCHEDULE

Time is of the essence. The Parties acknowledge that the goal of the scope and objectives of the study under this Agreement is to produce a timely and thorough report that adds value for the Client. To accomplish this goal, the Parties agree to communicate and mutually agree to honor established time commitments. These commitments include the Client providing requested documents, setting and keeping interview appointments and returning comments on the draft report consistent with the established project schedule.

The following project schedule milestones will be established by FCMAT upon receipt of a signed Agreement from the Client:

ACTION	TIMELINE
FCMAT provides the Client with a draft Agreement.	Draft Agreements are usually provided within 20 business days of the Client’s initial request for services.
Client returns partially executed Agreement to FCMAT along with the applicable organizational chart and the name and email of the of person who will be responsible for collecting and uploading documents requested by FCMAT.	Draft Agreements are valid for 30 business days.
FCMAT returns a fully executed Agreement to the Client and identifies the project schedule and the lead and other personnel assigned to the job.	Within five business days of the Client’s return of the signed Agreement.
Client uploads initial requested documents and data to FCMAT’s online SharePoint repository.	Within 10 business days of the Client’s receipt of the FCMAT document and data request list.
Fieldwork	Mutually agreed upon; usually, to

ACTION	TIMELINE
	commence within 10 business days of FCMAT’s receipt of requested documents and data.
Orientation meeting	First day of fieldwork.
Exit meeting	Last day of fieldwork.
Follow up fieldwork, if needed (e.g., rescheduled interview, additional interviews).	Mutually agreed upon; usually, within five business days of FCMAT’s request.
Client uploads supplemental documents and data to FCMAT’s online SharePoint repository.	Within two business days of the Client’s receipt of FCMAT’s supplemental document and data request(s).
Draft report submitted to the Client.	To be determined, usually, within eight weeks of the conclusion of fieldwork and receipt of all documents and data requested.
Client comments on draft report	Within 10 business days of FCMAT providing a draft report to the Client.

The Client acknowledges that project schedule deadlines build upon and are contingent on each previous deadline. Missed deadline dates will affect future deadline dates and ultimately the timing of the final report. For example, if the Client does not provide requested documents and data by the specified date, the fieldwork may not be able to proceed as originally planned.

FCMAT acknowledges that the Client has an educational program to administer, is balancing many priorities, and in some cases may have records management difficulties, staffing capacity issues, staff on various types of leave, or other circumstances, all of which will affect the project schedule.

The Parties commit to regular communication and updates about the study schedule and work progress. FCMAT may modify the usual timelines as needed.

7. COMMENCEMENT, TERMINATION AND COMPLETION OF WORK

FCMAT will commence work as soon as it has assembled an available and appropriate study team, taking into consideration other jobs FCMAT has previously undertaken, assignments from the state, and higher priority assignments due to fiscal distress. The Team will work expeditiously to complete its work and deliver its report, subject to the cooperation of the Client and any other related parties from which, in the Team’s judgment, it must obtain information. Once the Team has completed its fieldwork, it will proceed to prepare a report. In the absence of extraordinary circumstances, FCMAT will not withhold preparation, publication and distribution of a final report once fieldwork has been completed.

Prior to completion of fieldwork and upon written notice to FCMAT, the Client may terminate its request for service and will be responsible for all costs incurred by FCMAT to

the date of termination under Section 4 (Project Costs). If the Client does not provide written notice of termination prior to completion of fieldwork, the Team will complete its work and deliver its final report and the Client will be responsible for the full costs.

FCMAT may terminate this Agreement at any time if the Client fails to cooperate with the requested project schedule, provide requested documents and data and/or make staff available for interviews as requested by FCMAT.

8. INDEPENDENT CONTRACTOR

FCMAT is an independent contractor and is not an employee or engaged in any manner with the Client. The manner in which FCMAT's services are rendered shall be within its sole control and discretion. FCMAT representatives are not authorized to speak for, represent, or obligate the Client in any manner without prior express written authorization from an officer of the Client.

9. RECORDS

The Client understands and agrees that FCMAT is a state agency and all FCMAT reports are public records and are published on the [FCMAT website](#). Supporting documents and data in FCMAT's possession may also be public records and will be made available in accordance with the provisions of the California Public Records Act.

FCMAT has a records retention policy and practice, and every effort will be made to maintain records related to this Agreement in accordance with this policy.

10. CONTACT WITH PUPILS

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

11. INSURANCE

During the term of this Agreement, FCMAT shall maintain liability insurance of not less than \$1 million unless otherwise agreed upon in writing by the Client, automobile liability insurance in the amount required by California state law, and workers' compensation as required by California state law. Upon the request of the Client and receipt of the signed Agreement, FCMAT shall provide certificates of insurance, with the Client named as additional insured, indicating applicable insurance coverages.

12. HOLD HARMLESS

FCMAT shall hold the Client, its board, officers, agents, and employees harmless from all suits, claims and liabilities resulting from negligent acts or omissions of FCMAT's board, officers, agents and employees undertaken under this Agreement. Conversely, the Client shall hold FCMAT, its board, officers, agents, and employees harmless from all suits, claims and liabilities resulting from negligent acts or omissions of the Client's board, officers, agents and employees undertaken under this Agreement.

13. PUBLIC SAFETY CONSIDERATIONS

Whether due to public health considerations, extreme weather conditions, road closures, other travel restrictions or interruptions, shelter-at-home orders, LEA closures or other related considerations, at FCMAT's sole discretion, the Scope of Work, Project Costs, Responsibilities of the Client, and Project Schedule (Sections 2, 4, 5 and 6 herein) and other provisions herein may be revised. Examples of such revisions may include, but not be limited to, the following:

- A. Orientation and exit meetings, interviews and other information-gathering activities may be conducted remotely via telephone, videoconferencing, or other means. References to fieldwork shall be interpreted appropriately given the circumstances.
- B. Activities performed remotely that are normally performed in the field shall be billed hourly as if performed in the field (excluding out-of-pocket costs that can otherwise be avoided).
- C. The Client may be relieved of its duty to provide conference and other work area facilities for the Team.

14. FORCE MAJEURE

Neither party will be liable for any failure or delay in the performance of this Agreement due to causes beyond the reasonable control of the party, except for payment obligations by the Client.

15. EVALUATION

In the interest of continuous improvement, FCMAT will provide the Client with an evaluation survey at the conclusion of the services. FCMAT appreciates the Client's honest assessment of the Team's services and process. The Client shall return the evaluation survey within 10 business days of receipt.

16. CLIENT CONTACT PERSON

The Client's contact person designated below shall be the primary contact person for FCMAT to use in communicating with the Client on matters related to this Agreement. At any time when this Agreement or FCMAT's process requires that FCMAT send information, document request lists, draft report or final report, or when FCMAT makes other requests for the Client to act upon, this is the person whom FCMAT will contact. The Client may change the contact person upon written notice to FCMAT's job lead assigned to the study.

Name: Anne Staffieri, Ed.D., Superintendent

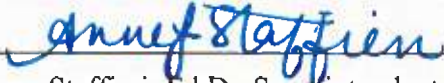
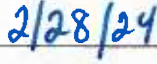
Telephone: (760) 753-6491 extension 5541

Email: anne.staffieri@sduhsd.net

17. SIGNATURES

Each individual executing this Agreement on behalf of a party hereto represents and warrants that he or she is duly authorized by all necessary and appropriate action to execute this Agreement on behalf of such party and does so with full legal authority.

For Client:

Anne Staffieri, Ed.D., Superintendent Date
 San Dieguito Union High School District

For FCMAT:

Michael H. Fine Digitally signed by Michael H. Fine
Date: 2024.03.07 16:21:41 -08'00'

Michael H. Fine, Date
 Chief Executive Officer
 Fiscal Crisis and Management Assistance Team

