Santa Maria Joint Union High School District
Special Education Study

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Study Purpose

- Creating cost-effective, high-quality, and legally compliant special education programs is a concern for virtually every school district in California

- There has been a long-standing gap between the funding provided to operate special education programs and the cost to provide services, and, in recent years, pressures from staffing shortages and learning recovery have amplified the challenges of running an effective and efficient program

- The Santa Maria Joint Union High School District (District) requested that School Services of California Inc. (SSC) complete an updated review of its Special Education Program (Program) to offer an assessment and recommendations on how the District can realize continued improvements for its Program

- The study used a multifaceted approach to first understand the issues facing the Program and then recommended changes to help the District operate a cost-effective, high-quality, and legally compliant Program

Achievements, Progress, and Pending

Achievements

- Ongoing commitment to inclusive practice, collaborative relationships, and commitment to student outcomes and opportunities
- Increased psychologists full-time equivalent (FTE) and other related services support to meet student needs
- Site coordinators provide administrative support for Individualized Education Program (IEP) compliance and as designees

Progress

- Multi-Tiered System of Support (MTSS) developed and beginning implementation
- Training supports for all staff is ongoing

Pending

- Written policies and procedures across departments
- Transportation policies and IEP procedures
- Progress monitoring on impact of MTSS
- Training for all educators on MTSS implementation

Study Scope and Methodology

District Data

Analysis of District-level data related to the Program, including financial information, pupil counts, class sizes, and caseloads

Comparative Data

Collection and analysis of data from local educational agencies (LEAs) of similar type and size to compare staffing levels and costs

Interviews

Interviews with District staff, including executive staff, a special education administrator, special education teachers, psychologists, speech-language pathologists, occupational therapists, principals, and classified staff

Organization of the Report

Organizational Effectiveness

Assessment of organizational effectiveness and the structures in place to oversee, manage, and support students with disabilities (SWDs)

Special Education Cost Drivers

Examination of the number of students being served by disability type and the extent to which pre-referral interventions successfully reduce referrals to special education

Revenues and Expenditures

Analysis of District special education revenues and Program costs

Special Education Staffing

Comparative analysis of the Special Education Department (Department) and pupil personnel, related services and classroom staffing ratios
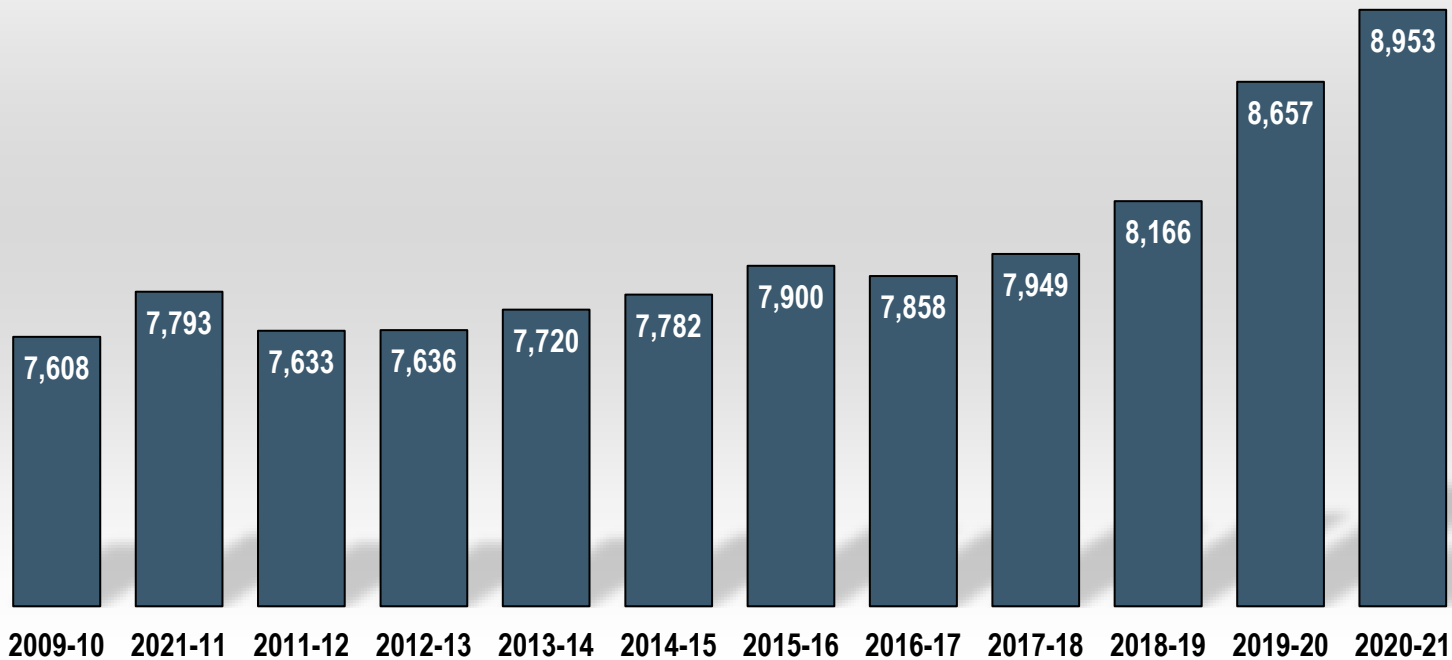
IEP Compliance

Examination of a sample of IEP files to ensure the 11 components necessary to demonstrate that SWDs are given opportunities to make progress based on their individual circumstances
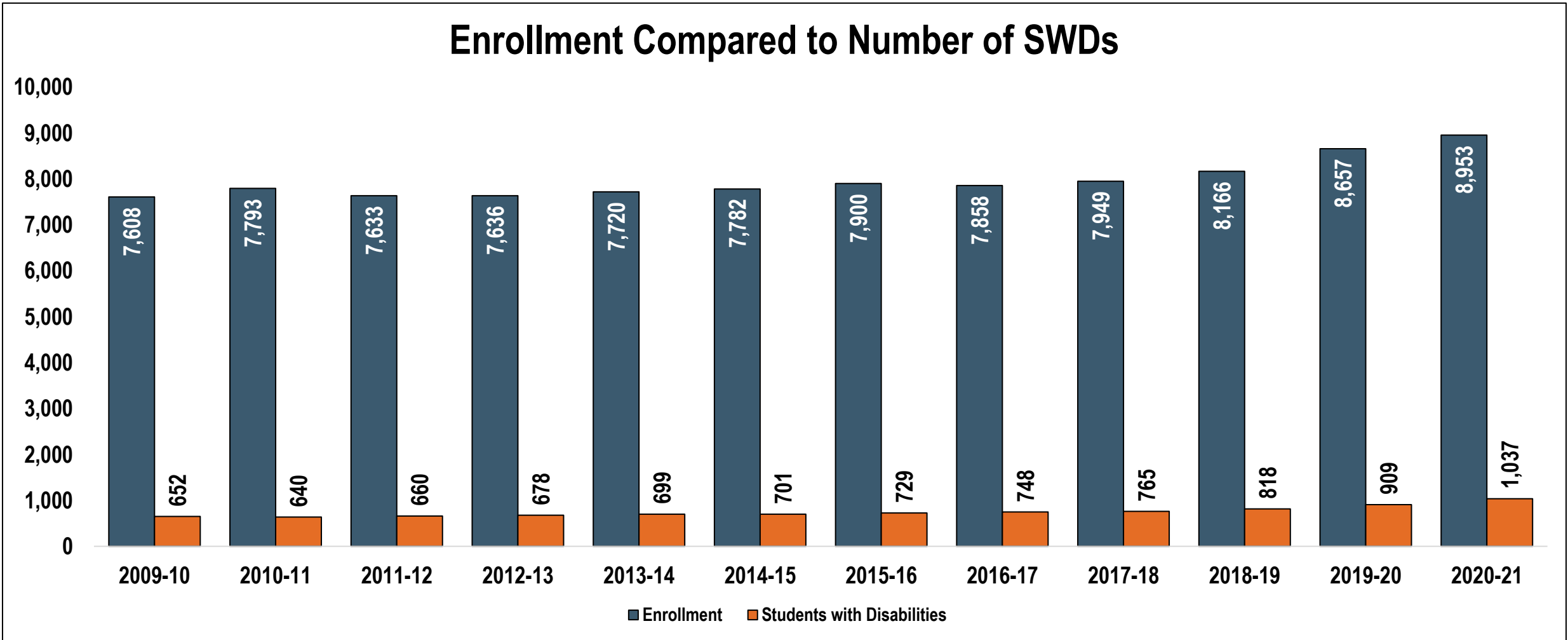
District Enrollment

Enrollment Changes Over 12 Years

Year	Enrollment
2009-10	7,608
2021-11	7,793
2011-12	7,633
2012-13	7,636
2013-14	7,720
2014-15	7,782
2015-16	7,900
2016-17	7,858
2017-18	7,949
2018-19	8,166
2019-20	8,657
2020-21	8,953

Source: California Department of Education (CDE) state-certified data

- In the 2020-21 school year, the District served 8,953 students in its schools
- Enrollment has been increasing, and the number of SWDs is increasing sharply
- As total enrollment changes, typically, the number of SWDs would be expected to rise or fall commensurately
- At the time of the site visits, the most current data available for SWDs was for 2020-21

Increase in Enrollment of SWDs

Enrollment Compared to Number of SWDs

	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21
Enrollment	7,608	7,793	7,633	7,636	7,720	7,782	7,900	7,858	7,949	8,166	8,657	8,953
Students with Disabilities	652	640	660	678	699	701	729	748	765	818	909	1,037

■ Enrollment   ■ Students with Disabilities

Source: CDE state-certified data

Organizational Effectiveness

Standard and Areas of Investigation

- The ability to provide effective instructional programs—that meet the needs of students and ensure high-quality student outcomes—is dependent upon a strong culture where organizational values and expectations are shared and there is a commitment to investing in employees and operational effectiveness

  - This is true of all programs, including those that serve SWDs

- The collective goal should be to ensure that a focus on student needs and outcomes is at the center of decisions about resource allocation and Program implementation

- Communication is critical to ensuring timely sharing of information, clarity regarding decision-making, and the establishment of policies, practices, and procedures for the staff

- Without a clear understanding of the direction, procedures, and goals of the Department, staff can be uncertain about responsibilities, roles, or requirements and expectations from the District and/or Director

Organizational Effectiveness

Study Outcomes

- The District has a strong student focus with a collective goal of equitable access for all and an emphasis on the importance of what is best for each student.

- The organizational culture of the Program, with a focus on inclusion, positive behavioral practices, and leveraging of the assets and strengths of the students, families, and community, aligns with the District.

- Improved connections, communication, and alignment between the general education MTSS and the Program are needed. Any successful MTSS must be a districtwide initiative that requires universal adoption and alignment of definition, planning, and implementation by the general education program.

  - Currently, the incorporation of special education into each site's educational continuum is determined by the site administration, resulting in an inconsistency in the levels of inclusion.

- Communication is critical to ensuring timely sharing of information, clarity regarding decision-making, and the establishment of policies, practices, and procedures for the staff.

- The development of clear and consistently implemented policies and procedures is needed to improve and increase communication, role clarity, and understanding of expectations.
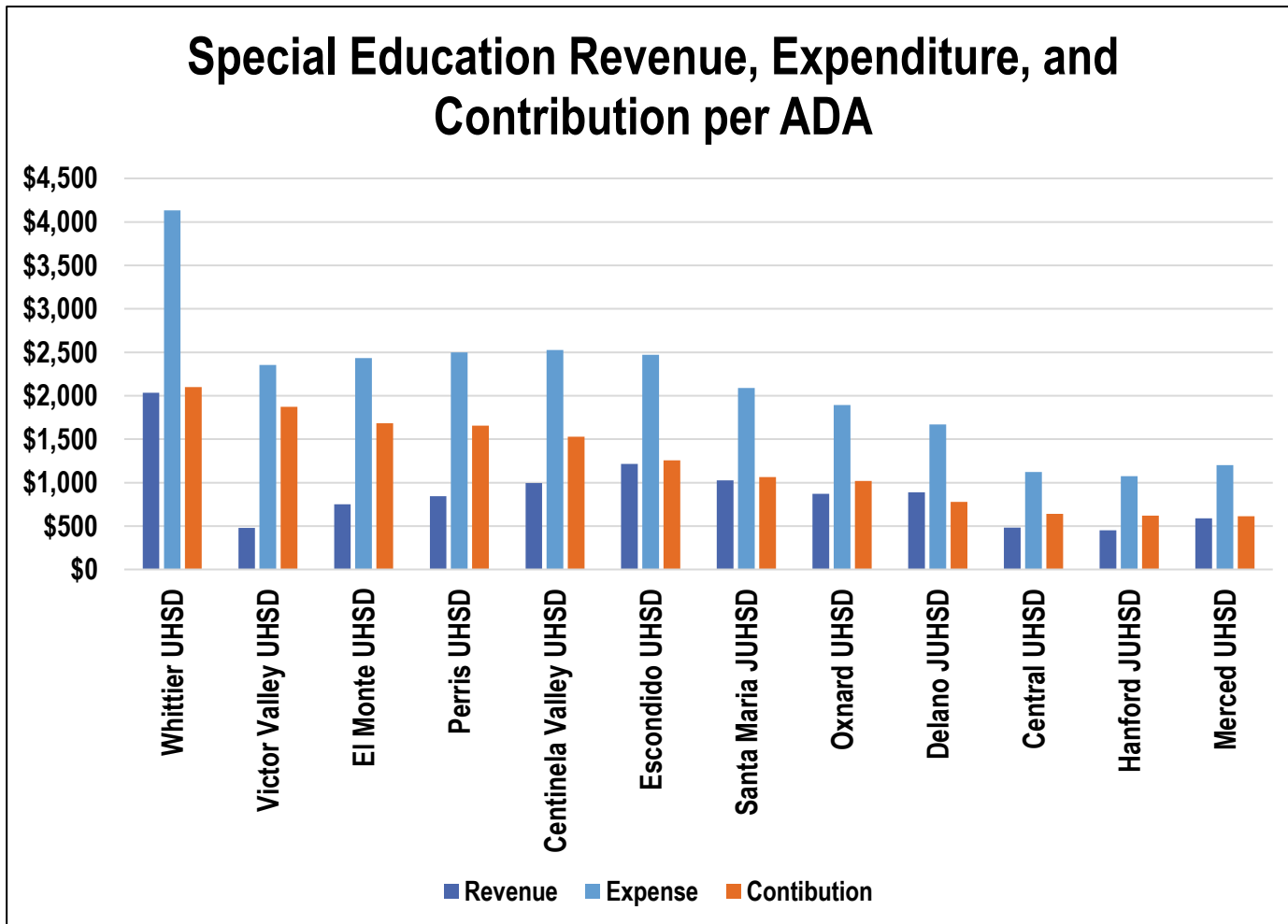
Organizational Effectiveness

Recommendations

1. Develop, communicate, and implement clear and concise policies and procedures

2. Provide staff with training and professional development opportunities

3. Schedule regular, mandatory staff meetings and communication

Special Education Revenues and Expenditures

Standard and Areas of Investigation

- The Local Control Funding Formula (LCFF) has changed the way LEAs think about funding for students, as all students, including SWDs, generate funding to provide base educational programs

- In understanding special education funding, LEAs should keep in mind that special education is not a "stand-alone" program

  - It is meant to supplement the education offered to the general population of students and to assist SWDs in attaining the educational goals contained in their IEP

  - Students in special education generate LCFF dollars first, and those dollars should contribute to their educational program

  - LEAs are required to spend the same state and local dollars on SWDs as they do on all students before any special education dollars are spent

  - Services to any student—including SWDs—exclusive of IEP-required services are not a special education expense

Special Education Revenue, Expenditure, and Contribution

Study Outcomes

Special Education Revenue, Expenditure, and Contribution per ADA

Legend: Revenue, Expense, Contibution

Source: 2020-21 Standardized Account Code Structure state-certified data

- The District contributed 50.88% of total Program costs from the General Fund, as compared to the comparative group average of 59.17% and less than the statewide average contribution, which was 64.37% in 2020-21.

- The District ranked the third highest in revenue at $1,026.57, the seventh highest in expenditures at $2,089.94, and the seventh highest in contribution per average daily attendance (ADA).

Special Education Revenues and Expenditures

Study Outcomes

- Increased collaboration and participation in the monitoring of the Department budget will help manage contributions required from the General Fund. Systems, including regular monitoring, will stabilize the District's special education maintenance of effort.

  - The lack of written policies and procedures outlining when programs or services are approved has resulted in a budget process that lacks the ability to strategically plan and maximize resources.

  - Alignment of expectations, clarity of communication, and written documentation would ensure collaborative and functional systems and would provide the Director and Business Services staff with the opportunity to create protocols and procedures for needed communication and desired outcomes.

- The District spent 15.6% in the "Other Outgo" category (the average statewide was 4.2%), which typically includes tuition paid for services to another LEA, a nonpublic or state school, or a regional program.

- The District appears to not utilize consistent protocols or procedures to assess the need for transportation, and staff have no written guidance for how to determine transportation on an IEP.

  - Transportation costs from 2016-2017 to 2020-21 show a steady increase in the cost of transportation.

# Special Education Revenue and Expenditure

Recommendations

4. Develop a formalized and more collaborative budget planning process, including a defined calendar and specific meeting topics and outcomes

5. Develop a formal process to review services provided by outside agencies and evaluate if contracting out continues to be the most effective approach

6. Adopt District transportation policies for SWDs

Special Education Cost Drivers

Standard and Areas of Investigation

- Having an effective process of early intervention is a proven, cost-effective way to address the academic, behavioral, and/or social-emotional needs of students

- The use of research-based interventions is required by the Individual with Disabilities Education Act (IDEA) and Every Student Succeeds Act (ESSA) prior to referral and determination of eligibility for special education

- Research-based interventions are strategies, teaching methodologies, and supports that have been shown to help a student improve academic, behavioral/emotional, or functional skills, which are critical components of an MTSS

  - These systems offer a comprehensive method of differentiated supports that include evidence-based instruction, universal screening, progress monitoring, formative assessments, research-based interventions matched to students' needs, and educational decision-making using student outcome data

MTSS and Cost Drivers for Special Education

Study Outcomes

- **The Department does not control all the costs associated with operating programs for SWDs**

  - **The degree to which an LEA implements MTSS with fidelity plays a key role in the outcomes for students, the rate of referrals to special education, and ultimately, the cost of serving SWDs**

- **The IDEA and the ESSA require that research-based interventions must be used and the results documented prior to determining eligibility for special education**

- **A robust MTSS can reduce or prevent the need for special education as a reactive intervention**
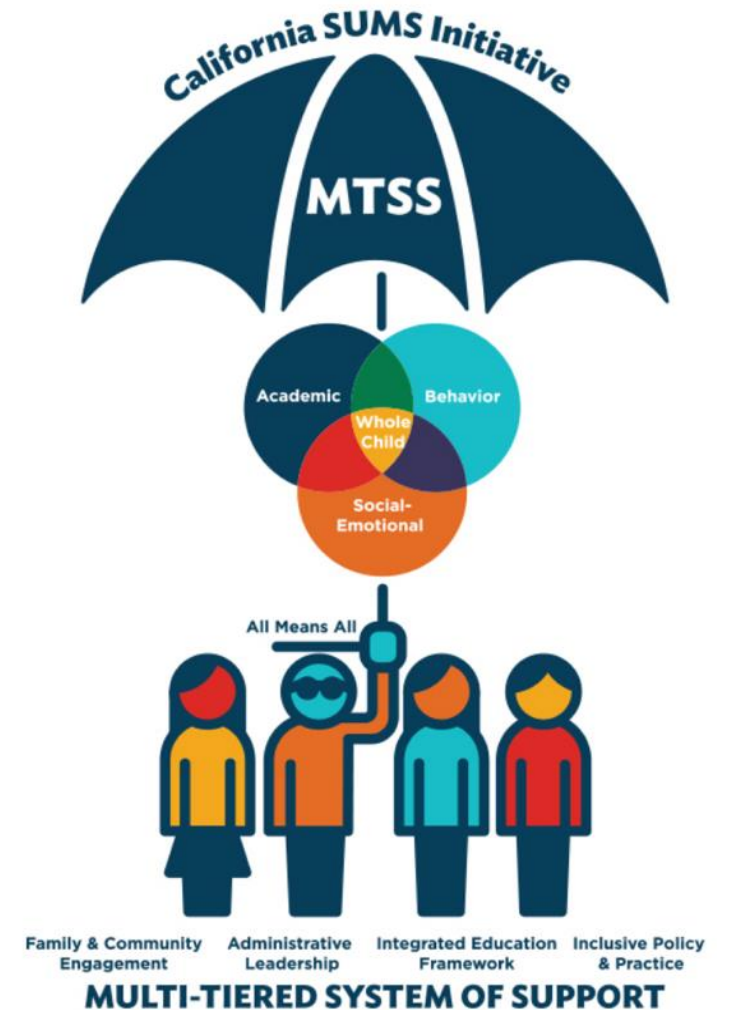
MTSS

Study Outcomes

- The MTSS has been recently defined, and ongoing efforts around communication, implementation, and monitoring for consistency and fidelity are necessary

  - Currently, the MTSS is impacting the counselors and the social and emotional learning components at a beginning level and is in the formative stage for academic and pre-referral interventions

- The District should ensure that academic, social and emotional, and behavioral interventions are implemented with fidelity and monitor the effectiveness and impact on student learning and referrals to the Program

  - Continued training is needed for general education and special education staff to learn about effective MTSS strategies, including universal design for learning, and to implement these strategies in their circle of influence—the classroom

- Site leaders indicate that tools for implementing District-adopted and financially supported universal screening, progress monitoring, formative assessments, and research-based intervention have been put in place, and data should be available in the coming months

Special Education Cost Drivers

Study Outcomes

- **There is a desire to have a culture of inclusion, and many sites operate co-teaching or other mixed-service inclusive models for SWDs**

  - **Sites have implemented programs to provide support to SWDs in study skills classes and co-teaching, where they are included with general education peers with accommodations**

- **Without a functional MTSS, referrals to special education may rise, and identification of students who may not meet the eligibility criteria is more likely**

- **Least restrictive environment considerations and placements are influenced by available classes and space in general education and should continue to be monitored for compliance**

  - **Adjusted schedules ensure SWDs who require pull-out have a schedule that allows specialized academic instruction to be delivered in study skills, with small groups being assigned to curriculum support periods and co-teaching opportunities for those with milder instructional needs**

Special Education Cost Drivers

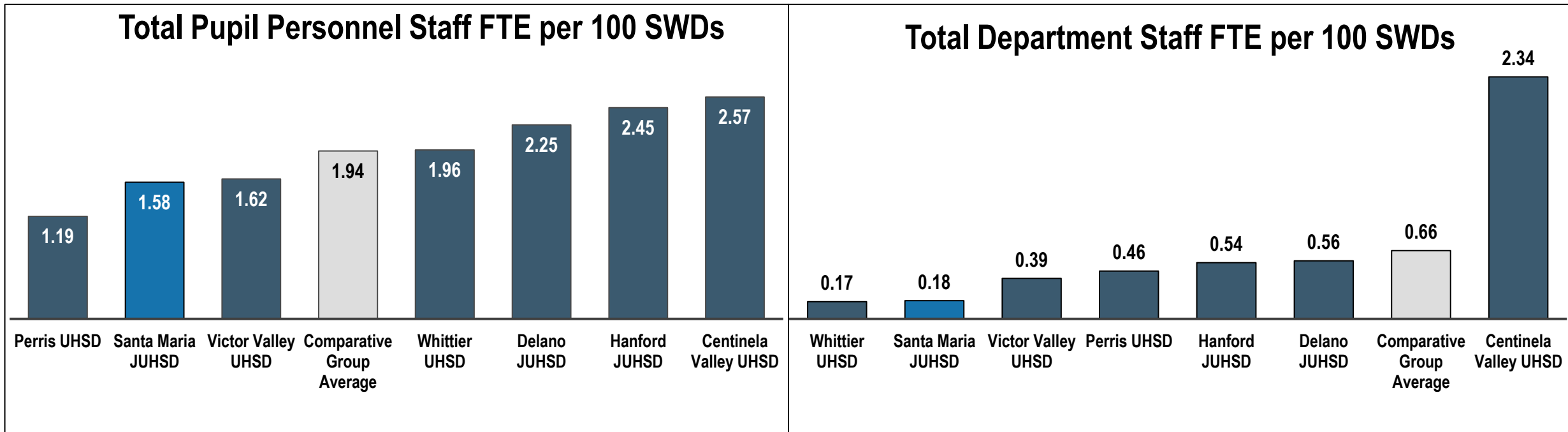## Recommendations

7. Implement an MTSS with fidelity

8. Train staff to consistently implement a student study team process and measure the results

9. Develop a broader continuum of placement options Districtwide, including further opportunities for co-teaching, inclusive models, and in-house programs to provide for appropriate transition to the District programs

Special Education Staffing

Study Outcomes

- For Department and some pupil personnel and related service provider positions, the Program is staffed below the comparative group average

- Caseload vs. workload analysis and considerations are necessary to ensure students receive the appropriate support and staff can complete the workload in a reasonable manner

- Except for the inclusive co-teaching caseload, which is higher than the comparative group average, teaching staff have reasonable caseloads, though the number of staff needing training, support, and mentoring has risen dramatically

- Staffing shortages, including lack of substitutes, vacancies, and unfilled hours, impact the classroom setting in two main areas:

  - Instructional assistance provided by aides and contractors does not meet the Program need

  - Teachers and instructional aides are unable to receive training, collaborate with appropriate partners, and often need to provide coverage for other staff or classes

Special Education Staffing

Total Pupil Personnel Staff FTE per 100 SWDs

District	FTE
Perris UHSD	1.19
Santa Maria JUHSD	1.58
Victor Valley UHSD	1.62
Comparative Group Average	1.94
Whittier UHSD	1.96
Delano JUHSD	2.25
Hanford JUHSD	2.45
Centinela Valley UHSD	2.57

Total Department Staff FTE per 100 SWDs

District	FTE
Whittier UHSD	0.17
Santa Maria JUHSD	0.18
Victor Valley UHSD	0.39
Perris UHSD	0.46
Hanford JUHSD	0.54
Delano JUHSD	0.56
Comparative Group Average	0.66
Centinela Valley UHSD	2.34

[1] **Source: District-provided data**

Recommendation

10. **Implement strategies to recruit, hire, and retain staff—including related services, Department, and substitute staff**

IEP Compliance

Standard and Areas of Investigation/Study Outcomes

- SSC reviewed areas of compliance risk based on IEP documents or implementation of services and evaluated whether SWDs make progress based on their individual circumstances

- Analysis of the identified components for writing and implementing IEPs indicates that the IEPs are timely, complete, and developed to ensure meaningful educational benefit, which points to the excellent work of the staff and site coordinators

  - A best practice for all Program staff is to participate in a structured review of IEP files upon completion, but before they are finalized, to identify errors and make corrections

- Systemic strengths are exemplified by the searches used to monitor students, caseloads, systemic data points, and checklists for ensuring accuracy and alignment with the California Longitudinal Pupil Achievement Data System, and high parent engagement and involvement in the development of IEPs

Special Education IEP Compliance

Recommendations

11. **Review existing best practices and resources for quality and compliant IEPs, and train staff on implementing these protocols**

12. **Conduct reviews of IEP files before they are finalized and filed**

13. **Utilize the functionality of SIRAS Systems to monitor IEP compliance components by site and Department administrator**

Thank you!

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