

South Whittier School District

SPECIAL EDUCATION REVIEW

MAY 14, 2010

Prepared By:

JANNELLE KUBINEC
ASSOCIATE VICE PRESIDENT

ANN HERN
DIRECTOR, MANAGEMENT CONSULTING SERVICES



South Whittier School District

SPECIAL EDUCATION REVIEW

MAY 14, 2010

PREPARED BY:

JANNELLE KUBINEC
ASSOCIATE VICE PRESIDENT

ANN HERN
DIRECTOR, MANAGEMENT CONSULTING SERVICES

Copyright © 2010 by
School Services of California, Inc.
1121 L Street, Suite 1060
Sacramento, CA 95814
(916) 446-7517
FAX (916) 446-2011
www.sscal.com

All rights reserved. These materials may not be duplicated in any way without the expressed written consent of School Services of California, Inc., except in the form of brief excerpts or quotations or as a teaching guide to employees of the school agency or organization that contracted for this report. Making copies of this report or any portion for any purpose other than your own or as noted above, is a violation of United States copyright laws.



TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
INTRODUCTION.....	1
FISCAL	4
Revenues and Contributions	5
Third Party Billing.....	6
Utilization of Restricted Funding	7
Federal Nonsupplanting Requirement	9
Recommendations and Options to Consider.....	10
PROGRAM SERVICES	12
Pupil Count Analysis	12
District Delivered Services.....	14
Recommendations and Options to Consider.....	16
PROGRAM MANAGEMENT AND STAFFING	18
Organizational and Management Structure.....	18
<i>Pupil Services</i>	<i>19</i>
<i>Classroom.....</i>	<i>20</i>
Policies and Procedures.....	22
Staff Development	22
Recommendations and Options to Consider.....	24
CONCLUSION.....	26

Executive Summary

Creating cost-effective, high-quality special education programs is a concern for virtually every school district in California. There has always been a gap between the funding that is provided to operate special education programs and the cost to actually provide services, but the gap has grown in recent years. For most districts, the widening gap can be attributed to rapidly rising costs due to a growing incidence of children with higher-cost disabilities (such as autism), litigation, and compensation, coupled with slow growth in special education revenues.

The South Whittier School District (District) requested that School Services of California, Inc., (SSC) review its special education program to offer an assessment of and recommendations on how the District can improve the quality and cost effectiveness of its program. While it is generally a good practice to regularly evaluate these services, the District has chosen an especially good time to evaluate how it operates and funds its special education program. Significant increases in federal funding for special education and Title I for 2009-10 and 2010-11 may be used to help offset current costs for intervention and possibly contribute to the special education program. Given the reductions in state-level support, the federal stimulus funding is a critical resource. This report includes suggestions for how to most effectively manage the new federal funds.

A total of 19 recommendations for improving the quality and cost effectiveness of the District's program are included. Following are a selection of key recommendations:

- ✚ Target remaining federal stimulus funding to special education program improvements that could result in near- and long-term cost savings. Examples include adding support for behavior coordination, redirecting or adding clerical support to increase reimbursement for some District-provided services, and providing training to build internal capacity.
- ✚ Evaluate current policies and practices regarding special education transportation to better manage and possibly reduce transportation costs.
- ✚ Work to increase third-party reimbursements for allowable administrative costs by training staff and possibly introducing incentives for data collection and submission. It would be reasonable to expect that the District could increase revenues by 10%-20%, or \$20,000 to \$50,000.
- ✚ Consider piloting a learning center model to effectively and efficiently meet special education and general education intervention needs in schools. Learning centers offer support to all special education students (Resource Specialist Program [RSP] and Special Day Class [SDC]) in one location/setting. In addition, "at risk" general education students may also

access support from the learning center. Under this approach, most students are included for most of their day in a general education classroom and receive support from the learning center as needed.

- ✚ Reduce special education classroom staffing levels to be consistent with statewide norms and/or consider using restricted resources to offset costs for staff that also support general education functions and activities. For instance, time spent by resource teachers supporting general intervention could be paid for from Title I and/or Economic Impact Aid (EIA). This could result in a savings to the unrestricted general fund of around \$80,000.
- ✚ Add additional coordination support for full inclusion and behavior intervention. Given the District's size and program composition, in the intermediate and long-term such staff can greatly assist the District in managing and perhaps avoiding program costs.
- ✚ Evaluate current students identified with speech and language as their primary disability to ensure that students have not been inappropriately identified.
- ✚ Review instructional aide staffing levels and bring them in line with comparable Districts.
- ✚ Prepare principals to take on more responsibility for the special education program.

This report contains many recommendations, and it is certainly not possible to implement all of them within a short period of time. Instead, District staff should identify those recommendations that are seen to yield the greatest benefits and then prioritize them. Specify who is responsible for implementing each item and create a timeline for implementation, along with periodic reviews to ensure that progress is being made.

We are confident that all District staff—working together as a team—will be able to make many positive changes toward the goal of operating a high-quality and cost-effective special education program.

Introduction

Creating cost-effective, high-quality special education programs is a concern for virtually every school district in California. There has been a long-standing gap between the funding that is provided to operate special education programs and the cost to actually provide services, but, in recent years, the gap has grown. For most districts, the widening gap can be attributed to rapidly rising costs due to a growing incidence of children with higher-cost disabilities (such as autism), litigation, and compensation, coupled with slow growth in special education revenues.

The South Whittier School District (District) requested that School Services of California, Inc. (SSC) review its special education program to offer an assessment of, and recommendations on, how the District can improve the quality and cost effectiveness of its program. While it is generally a good practice to regularly evaluate these services, the District has chosen an especially good time to evaluate how it operates and funds its special education program. Significant increases in federal funding for special education and Title I for 2009-10 and 2010-11 may be used to help offset current costs for intervention and possibly contribute to the special education program. Given the reductions in state level support, the federal stimulus funding is a critical resource. This report includes suggestions for how to most effectively manage the new federal funds.

Another reason the District has requested this study is to follow through with a recommendation by the District Assistance Intervention Team (DAIT), which advised the District to:

Conduct a study of the District's special education program to analyze the District resources and staff available to meet District needs, including an examination of the effectiveness of the continuum of services available to students with disabilities, including pre-referral procedures for identification, support and placement of students, and identify areas of additional need.

This study used a multifaceted approach to first understand the issues facing the District's special education programs and then recommend changes to help the District operate a cost-effective and high-quality program. This approach consisted of the following steps:

- ✚ Analysis of District-level data related to the special education program, including financial information, pupil counts, class sizes, and caseloads
- ✚ Collection and analysis of data from similar type and sized districts to compare program structure and costs

- ✦ A series of interviews with District staff, including the superintendent, cabinet, special education administrators, special education teachers, psychologists, speech-language pathologists, principals, and classified staff.

The remainder of this report provides a description of findings and recommendations based on analysis of the data and information collected regarding the District's special education program. The recommendations are intended to assist the District in making improvements to the structure, management, and delivery of its special education program. They are organized into three sections:

- ✦ **Fiscal:** Provides an overview of budget for the special education program, including the manner in which federal stimulus funds have been accounted for and their impact on the District's federal MOE requirement.
- ✦ **Program Services:** Describes the population served by the District and the types of programs offered to meet the needs of students with disabilities.
- ✦ **Organizational and Management Structure:** Reviews the structures in place to oversee, manage, and support students with disabilities. In addition, includes an analysis of staffing levels based on the current program offerings and structure.

Fiscal

The District, like virtually every other district in the state, has a significant gap between special education income and expenditures. The gap has grown from \$1.3 million in 2007-08 to nearly \$2.0 million projected for 2009-10. A large portion of this gap is due to the underfunding of special education, especially by the federal government. Other factors that have contributed to this imbalance include:

- ✦ Contract negotiations for salary, benefits, and other costs include all staff, but funding for general education has grown faster than that for special education, leading to growth in the gap
- ✦ Growth in the number of higher-cost disabilities, such as autism, and services to preschool-age children
- ✦ Increases in the cost incurred through placements in alternative programs and nonpublic schools
- ✦ Increases in the cost for special education transportation while state revenues have dropped

Revenues and Contributions

The funding provided to the District to support its special education program is based on an allocation made from the Whittier Area Cooperative Special Education Program (WACSEP), which is the District’s Special Education Local Planning Area (SELPA). The WACSEP receives funds on behalf of its six member school districts and uses these funds to support regional services and programs, program specialists, and other specialists that provide support to member districts. After WACSEP services and supports are funded, the remaining funds are allocated on a per-student basis to the member districts.

The District’s enrollment peaked in 2002-03 at 4,604 students, but since that time has declined significantly, reaching 3,906 students in 2008-09. Since special education revenue is based on counts of all students, the District’s significant drop in students has contributed to a drop in revenue. Figure 1 provides an overview of the District’s state and local revenue that supports the District’s special education program. During this period, federal funding has fluctuated somewhat, with a major increase attributable to the American Recovery and Reinvestment Act (ARRA) funds in 2009-10. The ARRA Individuals with Disabilities Education Act (IDEA) funding provides a one-time increase that essentially doubled the District’s IDEA income for 2009-10.

Special Education Funding Sources	2007-08	2008-09	2009-10
Federal Sources	\$629,565	\$536,556	\$605,983
American Recovery and Reinvestment Act			\$715,701
State Sources	\$323,211	\$418,012	\$396,185
Local Sources	\$1,944,720	\$1,628,127	\$1,750,118
Special Education Transportation	\$135,406	\$135,406	\$108,539
Total Special Education Revenue	\$3,022,902	\$2,718,101	\$3,576,526

Figure 1: Special Education Funding Sources for 2007-08, 2008-09, and 2009-10

The overall cost to support the special education program has risen steadily, which has resulted in increases in the amount of local contributions made by the District to support the special education program over time. As Figure 2 shows, the District’s contribution from its unrestricted general fund to support special education program services and related transportation costs is estimated to reach nearly \$2.0 million in 2009-10. However, the actual contribution level for 2009-10 should be reduced based on the availability of ARRA funding for special education. The District expects to receive \$715,701 in ARRA special education funding, of which 50%, or \$357,850, may be used to offset existing contributions. The District is aware that it should use the available budgetary flexibility, but the method used to recognize this adjustment does not meet current accounting guidance from the California Department of Education.

Contributions	2007-08	2008-09	2009-10
Special Education Program	\$1,122,361	\$1,645,935	\$1,493,892
Federal Special Education		\$69,426	\$255,705
Special Education Transportation	\$165,406	\$138,908	\$221,787
Total Contributions	\$1,287,767	\$1,854,269	\$1,971,384

Figure 2: Contributions for 2007-08, 2008-09, and 2009-10

Furthermore, at the time of our review, the budget reflected a contribution from the unrestricted general fund to the federal special education resource (SACS Resource Code 3310) of approximately \$255,705. The funds within this resource are used to pay for classified salaries, which are not subject to the Public Employees’ Retirement System (PERS) reduction adjustments. While salaries charged to federal resources are not subject to the PERS reduction, it is not an advisable practice to contribute funds to a federal resource purely to capture PERS reduction “savings.”

Included among the District’s growing areas of special education program contribution is special education transportation. Based on the District’s current program costs, state funding accounts for about one-third of the overall budget; the balance is made up from local contributions. The District participates in a special education transportation cooperative to provide transportation services for its special needs students. In 2009-10, there are several factors that contributed to the District’s rising level of local contribution required to pay for its special education transportation costs. This included a 20% reduction in funding for the program by the state, but also, as a member of the cooperative, the District’s percentage of overall usage in the cooperative increased relative to others, which added to the share of the costs the District was responsible for supporting.

Third Party Billing

School agencies are allowed to bill third party agencies for health-related services provided to students with disabilities. This type of reimbursement is referred to as Medi-Cal and Medi-Cal Administrative Activities (MAA) reimbursement. Reimbursements may be requested for any of the following services:

- ✚ Audiology
- ✚ Psychology services
- ✚ Nutrition services
- ✚ Service coordination/case management
- ✚ Nursing services

- ✚ Social work services
- ✚ Occupational therapy
- ✚ Speech and language services
- ✚ Physical therapy
- ✚ Transportation

The District is working with a company to provide support with filing reimbursements and this is the District’s first year participating in the Medi-Cal and MAA reimbursement programs. At the time of our interviews, the District has generated nearly \$82,000 in Medi-Cal reimbursements and expects to receive approximately \$100,000 in MAA reimbursements. To date, the District has not expended any of the fee-for-service revenue and, as the District works to develop its expenditure plans for the programs, it should use caution, especially if the plans will include personnel expenses. Both types of reimbursements can be volatile revenue sources because the success of the programs relies in large part on the buy in of employees taking the time to file the reimbursement claims.

Program Expenses

The District’s total spending for its special education program is anticipated to reach approximately \$5.5 million in 2009-10. Expenses have increased by approximately 20% since 2007-08. Figure 3 provides a breakdown of program expenses for 2009-10 by type.

Type of Expense	Amount	% of Expenses
Certificated Staff	\$1,837,660	33.0%
Classified Staff	939,057	17.0%
Benefits	823,166	15.5%
Books and Supplies	85,854	1.5%
Services and Other Operating	1,311,861	23.6%
Special Education Transportation	330,326	6.0%
Other Outgo	191,319	3.0%
Indirect Cost	22,842	0.4%
Total Expenditures	\$5,542,085	

Figure 3: Special Education Program Expenses by Type, 2009-10

As is the case with most programs operated within a school district, compensation for staff (salary and benefits) accounts for the vast majority of expenses. The District spends nearly 27% of its special education budget on contracted services (i.e., Services and Other Operating) and other outgo, which reflects a higher-than-average reliance on outside providers to deliver

program services. Most of the remaining funding from ARRA IDEA is being held by the District within the District’s \$1.3 million in services and other operating expenses.

While it can certainly seem that special education is an unusually high program expense of the District, this is the case for virtually every district. As reported in 2008-09, the special education expenditures accounted for 17.8% of the District’s overall spending. Figure 4 provides a breakdown on the areas of expenditures reported by the District compared to other similar districts. As shown, the District’s level of expenditures for special education, as represented as a percentage of its total expenditures, places it near the bottom half of comparison districts.

District	Expenditures per ADA	% of Total Expenditures by Type/Goal				
		Regular Education, K-12	Special Education	Other, General Education K-12	Supplemental Education, K-12	Other
East Whittier City Elementary	\$9,555	72.81%	25.97%	0.37%	0.85%	0.00%
Lowell Joint Elementary	\$7,560	75.61%	23.89%	0.50%	0.00%	0.00%
Newhall Elementary	\$7,539	77.05%	22.95%	0.00%	0.00%	0.00%
Whittier City Elementary	\$8,201	75.41%	21.86%	0.00%	2.73%	0.00%
Little Lake Elementary	\$8,248	76.11%	21.77%	0.00%	2.12%	0.00%
All Elementary Districts	\$8,890	77.05%	20.16%	0.33%	1.63%	0.83%
Eastside Elementary	\$8,292	79.89%	19.54%	0.57%	0.00%	0.00%
Garvey Elementary	\$9,232	73.31%	19.03%	0.22%	7.31%	0.13%
Lennox Elementary	\$10,660	81.79%	18.21%	0.00%	0.00%	0.00%
Los Nietos Elementary	\$9,190	78.23%	18.16%	0.00%	3.61%	0.00%
South Whittier Elementary	\$9,095	82.20%	17.77%	0.00%	0.03%	0.00%
Hawthorne Elementary	\$8,569	82.54%	15.37%	0.00%	0.00%	2.09%
Mountain View Elementary	\$8,166	86.24%	13.76%	0.00%	0.00%	0.00%

Figure 4: Comparison of Expenditures by Goal for, 2008-09

Utilization of Restricted Funding

There are two major categories of revenue in any school district budget. The unrestricted, or general fund, comprises largely state revenue limit funding. Most of this revenue goes toward paying operational costs, including teacher and administrator salaries. The other type of funding is restricted, or categorical, funding. While many of the state’s categorical programs are now flexible, federal funding, the state’s EIA program, and federal Title I funding remain restricted. It is also worth noting that, while state funding cuts have affected nearly all state-funded programs, EIA was not included in cuts and Title I and other federal funding sources have remained relatively stable, if not growing. Based on our review, it appears that there may be further opportunities to more efficiently allocate available resources to address special education program needs while alleviating the fiscal pressure on the general fund.

Based on the details provided by the District regarding the items funded within the special education budget, there were several areas that the District could consider funding with restricted resources. For instance, professional development related to instruction and/or program management could be funded from several sources, including, but not limited to, Title IA, Title IIA, or EIA. In a similar way, funding for instructional materials should first come from Proposition 20 before expending unrestricted funding for this purpose.

Another area that the District should consider is how it allocates funding from categorical programs to meet the needs of students, including special education students. In some cases, the students receiving special education services are also eligible for support under Title I (at-risk students), Title III, and EIA (at-risk and English Learners), and prior to the Tier III flexibility, other programs, such as the School Improvement Program (SIP—general school improvement needs) and after-school programs can also be used to support special education students. The District should review how funding from these and other categorical programs is allocated. If special education students are excluded or the resources are not directed to meet their needs, a strategy for tracking and ensuring that the resources are used to proportionally and appropriately meet their needs should be developed.

One possible reason why the above programs may not be directed to meeting the needs of special education students is that, in some cases, the funding (such as SIP, Title I, and EIA) is allocated to sites for their direction to high-priority needs. Since only in a handful of cases are there large enough numbers of special education students at school sites in the District to constitute a significant subgroup, it is easy to overlook the connection between the available resources and the needs of special education students. The District may need to direct sites to create budgets that are responsive to the District's strategic plan for special education by considering the needs of special education students as part of site budgets.

Federal Nonsupplanting Requirement

In order to exercise these options, or any major changes to special education expenditures, the District must ensure that it meets the federal maintenance-of-effort (MOE) requirement for special education, often called the “supplement and not supplant” standard (ref. Sections 300.203-300.205 of Title 34 of the Code of Federal Regulations [CFR]). Pursuant to these requirements, the District must spend the same level of state and local funds (or local funds only) on special education as in the prior year. However, there are several circumstances under which a lower level of state and local support is allowed, namely:

- ✚ The voluntary departure of expensive staff who are replaced by lower-paid staff

- ✚ The termination of services to pupils who have moved out of the District, are no longer age-eligible, or no longer need the service
- ✚ A decrease in the enrollment of children with disabilities
- ✚ The termination of costly expenditures for long-term purchases
- ✚ To the extent of 50% of the increase in federal funds over the prior year, provided the other 50% of the growth in federal aid is spent for the purposes of the Elementary and Secondary Education Act (ESEA) program (and virtually all K-12 expenditures meet that requirement)

Given that costs increase on the natural from year to year for benefit and step and column increases—and also that there may be a need to expand some programs and staffing—it is likely that a District will meet its federal supplement-and-not-supplant requirement, even after some budget cuts have been made and/or after some categorical funds are redirected to pay for services previously supported with special education resources. Furthermore, if the District were able to realize reductions in its special education population consistent with its overall decline in enrollment, this would be a basis to rebench the MOE to a lower level. In other words, there are viable options for the District to reduce its MOE requirement so the MOE is not a barrier to implementing program cost reductions. Based on data provided by the District, it appears that the federal supplement-and-not-supplant requirement for 2009-10 will be met.

Recommendations and Options to Consider

1. The District should adjust its method for accounting for ARRA IDEA (SACS Resource 3313) funding to comply with California Department of Education's (CDE's) accounting guidance. Following are specific actions that the District should take:
 - a. The District should charge approximately \$357,850 in special education costs currently charged to Resource 6500 to Resource 3313. This would result in a reduction of the same amount to the District's current local contribution, reflecting the available flexibility with federal funding.
 - b. The remaining \$357,850 in ARRA IDEA funding should be applied towards any anticipated "new" costs in 2009-10 (i.e., *new* nonpublic school [NPS] costs, or other added costs for existing services), which are anticipated to be approximately \$125,000 in 2009-10.
 - c. Invest the remaining ARRA funds to implement recommendations in this report, such as one-time costs to develop programs, training, and building behavior support capacity.

- d. If appropriate, capture allowed MOE rebenching changes, such as a decline in students.
2. The District should also reconsider its current practice of charging expenses that exceed revenue to federal special education funding. It would be more appropriate to reflect expenses up to the amount of federal revenue and shift any excess expenses to state special education funding (Resource 6500). Specifically, this would mean moving the \$255,705 in classified salaries to Resource 6500 and reflecting the contribution in Resource 6500.
3. Consider using restricted resources to offset costs for staff that also supports general education functions and activities. For instance, time spent by resource teachers supporting general intervention could be paid for from Title I and/or EIA (see “Program Management and Staffing” section for additional details).
4. Develop a plan to maximize the collection and use of third-party billing revenue. The District should continue to provide training and encourage staff to collect data required for reimbursements. It would be reasonable to expect that revenues could increase by upward of 50% with continued effort by staff. However, while growth is likely, this remains a volatile and unpredictable resource. As a result, the best uses for such funding are one-time costs, such as staff development, technology, and capital improvement needs.

The District can increase the level of funding from this resource, but it can only do so if it collects the required data, which can be labor intensive. One practice that has proven effective in other districts is to provide a small financial incentive for staff to collect the required data. For instance, a small percentage of the collected revenues can be provided to Speech Pathologists for discretionary program use if they participate in collecting data that generates revenues.

5. Consider modifying transportation policies to better manage transportation costs. The District is legally required to provide a “free appropriate public education” (FAPE) and offer the “least restrictive environment” (LRE). This may or may not include the provision of door-to-door transportation. The District should continue to carefully monitor Individualized Education Programs IEPs to ensure that the transportation offered is warranted. Furthermore, the District could consider implementing a hub model for transporting students with pick ups from neighborhood schools to the extent that students are able to transport themselves to their neighborhood schools. This could reduce the number of overall routes provided by the District.
6. Prepare for the ARRA funding cliff. ARRA funding is helpful while it lasts, but the gap between revenues and expenditures for special education are an ongoing problem for which one-time resources, such as ARRA, provide short-term relief, but do not solve the long-term problem. While there are recommendations contained in this report that will hopefully lead to

ongoing and long-term cost savings, the level of local contribution required to meet program needs is likely to increase once ARRA IDEA funds are fully expended, which could be as early as 2010-11.

Program Services

The cost of special education services is driven by several factors, including the number of eligible students and the manner in which services are provided. This section includes findings, analysis, and recommendations regarding the students requiring special education services and the types of services offered.

Pupil Count Analysis

The state's current special education program funding model was overhauled more than ten years ago from a structure that tied funding based on prevalence and types of disabilities served to one that is now largely based on the presumption that incidence and types of disabilities do not vary significantly from district to district. Hence, funding is based on the number of students overall from which each district must determine, as a member of its SELPA, how best to meet the needs of those students within the SELPA.

Given the manner in which funding is provided to support students with disabilities, there is a deliberate negative financial incentive to identifying students who should receive special education services if their needs can be met adequately and appropriately through other programs. As a result, it is useful to analyze the trends and current composition of the population receiving special education program services.

Over the past 10 years, the District's enrollment has declined approximately 15%, from a high of 4,604 students in 2002-03 to 3,906 students as of 2008-09. As noted earlier, the loss of students has resulted in a loss of general operating revenues and special education revenues since funding for special education programs is based on average daily attendance and not the counts of students with disabilities served. While the District's enrollment has dropped, its special education population has grown in numbers. Figure 5 compares the District's total student enrollment to the counts of school-age students with disabilities over a five-year period (2004-05 to 2008-09).¹ As shown, during this period, total student enrollment dropped by nearly 12%, while the population of students with disabilities increased by 6.1%.

¹ Incidents of disability are calculated by dividing the counts of school-age students reported as having a reported disability by the total number of students enrolled. This analysis excludes preschool-age students.

Year	Total Enrollment	Student with Disabilities (SWD)	% Students with Disabilities	% Change Enrollment	% Change SWD
2004-05	4,432	394	8.89%	—	—
2005-06	4,199	365	8.69%	-5.26%	-7.36%
2006-07	4,086	377	9.23%	-2.69%	3.29%
2007-08	4,111	388	9.44%	0.61%	2.92%
2008-09	3,906	418	10.70%	-4.99%	7.73%
Cumulative Change				-11.87%	6.09%

Figure 5: Change in Total Enrollment versus Special Education Enrollment, 2004-05 through 2008-09

It is fairly common to find that districts with declining enrollment experience less of a drop in the counts of their students with disabilities than in their overall population. However, considering the significant drop in enrollment, the relatively large growth in students with disabilities is somewhat unusual. During the period shown in Figure 5, students with disabilities increased by approximately 24 students while overall enrollment decreased by more than 500 students. The trends observed in the District suggest that early intervention options, or alternatives to special education, are lacking or in need of improvement.

It is also important for program planning purposes to consider the incidence of disabilities by type over time and compared to other similar districts. Such an analysis can point to areas where the District may need to consider creating or phasing out programs and potential areas of overidentification. Figure 6 provides a breakdown of the incidence of disabilities by type.² It shows that, from 2004-05 to 2008-09, the increases can be accounted for across virtually all of the classifications. The areas with the most change over time, and where the District also stands out from others, is its incidence of students with a primary disability of speech and language impairment, which could be an indicator that the District is overidentifying students for speech services.

	Mental Retardation	Speech & Language Impairment	Emotionally Disturbed	Other Health Impairment	Specific Learning Disabled	Autism	Other*	TOTAL
Little Lake	0.16%	3.19%	0.14%	0.67%	2.60%	0.95%	0.58%	8.29%
Statewide (Elementary)	0.49%	3.22%	0.26%	0.69%	3.77%	0.83%	0.49%	9.75%
LA County (Elementary)	0.47%	2.62%	0.23%	0.78%	4.45%	1.09%	0.47%	10.13%
Whittier City	0.26%	3.95%	0.38%	0.62%	3.81%	1.48%	0.81%	11.30%
Los Nietos	0.39%	5.72%	0.15%	0.44%	3.60%	0.64%	0.44%	11.40%
S. Whittier	0.23%	4.94%	0.18%	0.54%	3.53%	0.87%	0.40%	10.70%
S. Whittier (04-05)	0.18%	4.15%	0.02%	0.27%	3.11%	0.59%	0.57%	8.89%

*Includes Hard of Hearing, Deaf, Visual Impairment, Traumatic Brain Injury, and Multiple Disabilities

Figure 6: South Whittier School District Incidents of Disability by Type, 2008-09 and 2004-05

² The disabilities listed are based on the state's reporting structure and refer to the primary disability reported for each student.

District Delivered Services

The District must offer programs and services that at a minimum provide students with a FAPE in the LRE for student living within the District's attendance area. Among the challenges for districts is to create or offer programs and services that are "appropriate" and "least restrictive." While neither legal requirement mentions "cost effective," this is also a factor that should be in the forefront of the planning process.

The District's program for students with disabilities includes services provided at District schools, WACSEP-supported classrooms, placements in programs at neighboring districts, and NPS/agencies. The WACSEP programs are paid for by the SELPA before allocations are made to member districts. This includes programs primarily in support of low-incidence disabilities, such as deaf and hard of hearing, severely handicapped, and autism. In addition, WACSEP also provides support for preschool, psychologists, and behavior program specialist. The program coordination and specialist support available to the District from WACSEP is generally shared with Little Lake Elementary and Los Nietos Elementary, which, with South Whittier, are the three smallest districts in WACSEP. There are a total of three special day classes for severely handicapped (SDC-SH) students that the receive WACSEP support. These include an autism focus grade K-2 class at Lake Marie, grade K-3 at Los Altos, and grade 3-6 at Monte Vista.

Considering the size of the District, it supports a wide array of program options within its schools. This includes Resource Specialist Program (RSP) teacher and aide support at each school. In addition to the SDC-SH classrooms supported by WACSEP, the District supports special day classes for learning handicapped (SDC-LH) students at Carmela (grade K-2), McKibben (grade 3-5), Lake Marie (grade 5-6), and Graves (grade 6-8). There are also five schools that support a total of nine full-inclusion students.

The full-inclusion services, allow students, generally severely handicapped, to remain at a district school when they may otherwise require services and support outside the district. Full inclusion programs can be highly effective and often provide for the least restrictive environment where students with disabilities are able to learn with their typically developing peers for the entire or at least a significant part of their school day. Full inclusion students are considered part of the special education teacher caseload at their site with additional instructional aide support provided.

Based on data from December 2009, the District has nine students receiving services from NPS at an average cost of \$16,153 per student, a significant decline from the 12 students at an average rate of \$33,431 in 2008-09. The District's Director of Special Programs and Coordinator of Special Education have worked to reduce the overall placements and costs of such placements, which has reduced costs by more than \$250,000 between 2008-09 and 2009-10. A factor that has

contributed to the District’s reliance on NPS support is its lack of District program options for students in grades 3-6 that require SDC-LH support. The staff responsible for special education is aware of this need and would like to fill it with a District-run program option.

A growing population and area of cost for the District is special education preschool. As shown in Figure 7, currently students age 0 to 4 account for approximately 14.3% of the District’s total special education population. Overall, the proportion of students receiving special education services who are of preschool age has been rising within the District and, like other districts in WACSEP, appears to be above the county and statewide averages.

The District maintains two special education preschool classrooms, but there are other students who are enrolled in out-of-district placements based on determinations by WACSEP for whom the District pays a billback for services. In addition, WACSEP offers a preschool/kindergarten speech and language support program that currently provides services to 28 students residing within the District. Since intake is handled by WACSEP, the District is not aware of placements until after referrals are made.

2008-09 Unless Notes Otherwise	Age 0 to 4	
	#	% of Special Education Population
South Whittier, 2004-05	51	11.43%
South Whittier	70	14.34%
Los Nietos	42	15.38%
Little Lake	85	17.14%
Whittier City	187	19.85%
Los Angeles Countywide	12,487	10.00%
Statewide	48,244	7.11%

Figure 7: Level of Infant/Toddler and Preschool Support, 2008-09

However, it should be noted that a high incidence of preschool support does not automatically mean that continued services are required; services provided in preschool can be an effective early intervention and could provide the District with the opportunity to effectively exit students from services when goals are sufficiently met. Based on the fact that incidents of disabilities in the school-age population have increased in recent years, this may be an indicator that the District tends to continue to provide services even when there may not be a continued need.

The District has also initiated early intervention for school-age students in the form of Response to Intervention (RTI) and has revamped and recently launched a new Student Study/Success

Teams (SST) process. Ideally, efforts to implement an early intervention support structure should be led, managed, and monitored as a general education function. The efforts underway in the District include involvement from general education, but the degree of involvement varies from site to site. Some sites have fully embraced the opportunities for RTI and SSTs, but the District is at the early stages of implementation. There are a number of sites that are not implementing SSTs or RTI with fidelity, which includes relying on special education program staff to coordinate the processes rather than being among the resources to support the process.

Recommendations and Options to Consider

7. Consider piloting a learning center model as a means to effectively and efficiency provide for special education and general education intervention support. The combination of declining enrollment and State Budget cuts have led to smaller numbers of eligible students with disabilities at individual campuses and fewer early intervention support options. The District could address both issues by implementing a learning center model, which would blend special education services with early intervention for at-risk general education students.

Learning centers offer support to all special education students (RSP and SDC) in one location/setting. In addition, at-risk general education students may also access support from the learning center. Under this approach, most students are included for most of their day in a general education classroom and receive support from the learning center as needed. Key attributes of a learning center include the assignment of staff to the center with case management responsibilities for specific students and aide support assigned to the school rather than a specific classroom.

Such a model could provide for a more efficient and effective use of staff insofar as sites with relatively low numbers of students with disabilities (both RSP and SDC) may be able to provide support to students with disabilities and fill intervention needs that may be funded from restricted resources. Furthermore, this approach may result in greater levels of inclusion in general education settings and present an attractive program option for parents who have to date sought nonpublic school and/or agency support.

8. Review demographic data for all students identified with a primary disability of “speech and language impairment.” In particular, check data to ensure that students are not overidentified based on English Learner status.
9. Give the District’s size and program structure, full inclusion program services are an important part of the special education program. There are also emerging needs in the area of behavior intervention. Currently, both areas are among the many responsibilities for the Director of Special Programs and Coordinator of Special Education. The District should consider adding at least a 0.5 FTE full inclusion specialist and a 0.5 FTE intervention specialist with expertise in behavior support. These positions could be combined if a well

qualified person can be found, or the duties could be added to a current position with a reconfiguration of teaching or supervision duties. One approach to funding the position would be to pay for the full inclusion specialist portion of the position with special education funds, possibly with ARRA funding for 2010-11 with an expectation that savings can be found by bringing back students from county of NPS programs with this additional support in place. The intervention specialist could be paid from other restricted resources such as Title I or Economic Impact Aid as a general education support.

10. The District has made progress instituting improvements to its SST process and there is some evidence of RTI as an early intervention support, but there is inconsistent implementation across school sites. Immediate action should be taken to ensure that SSTs and RTI are adequately supported as general education funding expenses. This requires buy-in and engagement by school site administrators, availability of support to guide assessment and evaluation of student needs, and options for early intervention support that are known and available.
11. Consider developing a grade 3-6 SDC-SH classroom which can more cost effectively serve students that otherwise would be served by other districts or NPSs. Savings could come from reductions in the cost of providing instruction and transportation. The savings could be in the range of 10%-25% of the current costs based on a comparison between the average cost of providing a District-supported SDC classroom with aide support compared to the average rate for NPS and WACSEP billbacks for similar support. Should the District create such programs, it may want to seek feedback from existing NPS parents regarding what they would like to see in a program and actively work to bring their students back to the District. The District will need to allow adequate time for planning and transition, which could take upward of 12 to 18 months.
12. To the extent the District continues to show success in reducing and/or eliminating NPS placements, the District should take full advantage of the option to reduce its maintenance-of-effort (MOE) level to the extent possible. This will help the District reduce its overall contribution on an ongoing basis to the extent it is able to identify ongoing reductions in cost. This should include reducing the MOE by around \$250,000 for 2008-09, which could provide more flexibility in how IDEA ARRA funds are spent towards “new” or additional costs relative to the MOE.
13. Plan for further decline in enrollment. The District’s enrollment trends suggest that there will be continued decline in enrollment, which hopefully will also include a proportional decline in students with disabilities. The District should evaluate the placement of programs and assignment of staff based on projections for enrollment. Given the relatively small group sizes at most school sites, the District should consider whether programs may benefit from

consolidation or if alternative models, such as collaborative teacher or consultative inclusion models, would be more appropriate.

Program Management and Staffing

As with most programs and support that are part of K-12 education, personnel comprise the vast majority of program expenses. Routine review of staffing levels, assignments, and effectiveness is an important part of ensuring that special education services are cost effective and of high quality. For this portion of the review, we focused attention on staffing levels, roles and responsibilities, and organizational structure.

Organizational and Management Structure

The Special Education Department is competently run by staff dedicated to ensuring that the program is compliant, of high quality, and cost conscious. Approximately three years ago, responsibility for special education was given to the Director of Special Programs and last year a new Coordinator of Special Education was added to the team. The Coordinator of Special Education provides day-to-day oversight of the program, assists staff with questions and issues, and has actively worked over the past year to implement procedures, develop programs, and implement many other improvements. There is a high degree of respect and admiration among District Office and site level staff for the Coordinator of Special Education based on the competence she has shown as well as her ability to communicate and respond in a timely way to needs.

In addition to the District's employees, WACSEP also provides a small amount of Program Specialist support to the District. The District, along with the two other small districts in WACSEP, share a 0.7 FTE Program Specialist. Concerns were raised by staff that the current arrangement leaves the District with a level of support that is too small to make a significant difference. However, there is a recognition that WACSEP provides some valuable support, but because the District is among one of the smaller districts in WACSEP, fairness and adequacy of support was voiced as a concern.

The District has made efforts to provide site administrators with training regarding legal and procedural requirements for special education. Principals shared that they found such training helpful in meeting their site's special education program needs. There appears to be a varying degree of involvement by site administrators with their special education programs. This may be due in part to the fact that some sites have very small programs while others may have multiple special education classrooms. The District would benefit from furthering a Districtwide culture

of ownership of all students by all staff members. At present, the Special Education Department is very involved with promoting and supporting early intervention, which should be a general education function. Furthermore, there appear to be some inconsistencies in how IEPs are prepared and frustration at some sites regarding the internal process for managing the process for assessing and preparing an IEP.

PUPIL SERVICES

The District relies heavily on contracted services from nonpublic agencies and independent service providers for speech and language pathologists, psychologists, and occupational therapy support. The District employs one adaptive physical education teacher and four speech and language pathologists. It contracts for two part-time psychologists, who primarily are involved with assessment, but have some time available to participate in SSTs and other consultation as requested. In addition, the District contracts for 2.0 FTE speech and language pathologists to supplement District staff.

In virtually all areas, the District maintains above-average levels of staff support per student. This may be due in part to delays in adjusting staffing in response to declines in student enrollment, but it also seems that the District has historically maintained a program with above-average staffing.

For instance, the District staffing levels of Speech and Language Pathologists (SLP) are well below state and county averages. The District currently has one SLP for every 651 students, which compares to 1,863 and 1,199 at the county and state levels respectively. However, while the District's level of support appears to be higher than that observed elsewhere, it most likely reflects the fact that there is a higher incidence of speech services required based on current IEPs.

The District's staffing for psychologists is well below the state and county averages at one per 2,441 students, compared one per 1,218 and 1,139 students at the state and county levels, respectively. According to the psychologists, the majority of their time is dedicated to program compliance requirements, such as administering assessments, writing reports, and participating in IEP meetings. Recently the psychologists have started providing some counseling and behavior support.

The District also relies on contracted occupational therapists (OTs) and nursing services. The cost for the OT services is anticipated to be approximately \$200,000 in 2009-10. The District has a very skilled OT provider, which has allowed it to provide high-quality services. However, compared to other similarly sized District's, the level and cost of OT services are higher than

average. Based on discussion with the current provider, there may be ways for the District to reduce costs in this area.

Based on interviews, a major reason that staff are able to successfully manage caseloads (e.g., meeting deadlines, completing reports on time, holding required sessions, and being available for support when needed) is because they cooperate to a high degree. There are strong relationships present between staff, which is evidenced by an environment where people help colleagues and make adjustments as soon as needs are noticed.

CLASSROOM

Based on a review of the Resource Specialist Program (RSP) and Special Day Class (SDC) staffing levels, we found that the RSP caseload levels are average or slightly below average and that the SDC caseloads are close to observed statewide averages. We expect RSP teachers to be at or near a caseload of 28:1 and SDC classrooms to have between 9-14 students, depending on the complexity of the students' needs.

Based on the District's data collected for 2009-10, the average RSP caseload is 24 students. Most RSP teachers have a caseload of 23 to 28 students, with one at 16 and one at 30. In addition, each RSP classroom has at least one five-and-a-half-hour aide. While the District has tried to avoid multiple-school assignments of RSP teachers, in order to maintain RSP support at all sites (including those with a relatively small caseloads) with the exception of the RSP teachers assigned to the middle schools, all RSP teachers provide services at two sites.

With respect to SDC caseloads, the class size varies by type of SDC classroom and grade level. The District has established the general guidelines that no SDC Severely Handicapped (SDC-SH) or special education preschool classes should exceed 10 students, nor should SDC Learning Handicapped (SDC-LH) classes exceed 12 students. While these general guidelines are in place, almost all classes are slightly below the recommended guidelines with respect to teacher support. In addition, each SDC classroom is generally assigned at least one instructional aide, plus several one-on-one aides.

There is a culture within the District that appears to have originated with—or at a minimum is perpetuated by—WACSEP practices that any SDC-SH class should never exceed three students to one adult and classes for students with autism should not have more than two students per adult. The level of instructional aide support in both SDC and RSP classes is well above comparable districts. Comments made by staff suggest that there is a presumption of quality of services based on having more adults in the classrooms. In fact, the most common concern raised by staff was a desire for more aide support. Specific concerns were raised regarding several

instances where another student would be added triggering a need to add more aide support in order to maintain the expected 3:1 or 2:1 students-to-adult ratio. This has been a longstanding practice and seems to be taken for granted as an entitlement without regard to need or effectiveness.

In addition to at least one instructional aide assigned to support all RSP and SDE classrooms, there are also 12 one-on-one aides. Many of the one-on-one aides are providing support to fully included students, but this too seems to be higher than expected.

As of April 2010, there are a total of 27 IAs plus 6 substitutes with partial assignments. The majority of aides are in SDC classrooms or supporting full inclusion students. Figure 8 provides a breakdown of the number of IAs by type.

	# of Staff (Headcount)		
	5 hour	5.5 hour	6 hour
RSP	2	5	--
SDC	4	5	3
1:1*	4	4	--
Total	10	14	3
* There is additional substitutes: 4 - 3 hour, 1 - 2 hour, and 1 - 1.5 hour			

Figure 8: Instructional aide staffing levels by type, 2009-10

Compared to other districts, the overall level of staffing for aides is above average, which as noted earlier is in large part due to the longstanding staffing policy of WACSEP. With respect to one-on-one aides, considering the overall number of IAs, there appears to be a higher than expected number of one-on-one aides, which is in part explained by the approach used by the District to implement its full inclusion model.

While there generally were very positive comments regarding the quality of aides, there were some concerns raised regarding the qualifications and method for assigning instructional aides (IAs), especially those supporting fully included students. Specific examples were provided of turnover in one-on-one aides that negatively impacted program services and long-term assignments of one-on-one aides that build dependence rather than independence for the student. The District realizes that this is an area with room for improvement and is interested in implementing a procedure that is being piloted in Whittier City Elementary School District to evaluate whether additional aide support is needed.

The District provides full benefits for any employee working at least four hours per day and five days a week. As a result, all aides, including the part-time RSP aides, receive full benefits. The District provides aide support that overlaps with student contact time to every RSP classroom,

which exceeds the minimum legal requirement that states that “at least 80 percent of the resource specialists within a local plan shall be provided with an instructional aid.”³

Policies and Procedures

The District needs a user friendly Special Education Handbook that site-level staff, including school administrators, can refer to as they support the special education program. It was noted that the lack of clear procedures leads to inconsistencies between sites and is a barrier to holding responsible parties accountable. Furthermore, this creates added workload for the special education staff, which must field questions and requests that may otherwise be addressed by the Handbook. There are several areas that would be particularly beneficial for the District to address:

- ✦ Process for hiring additional aides: There is review of aide assignment and support by the Director of Student Services, but procedures should be implemented to facilitate the use of an assessment process to determine when criteria are met that warrant the need for additional support, including the assignment of one-on-one aides. In addition, the District should consider assigning aides to a school and/or class, rather than to an individual student.
- ✦ Process for referrals: Most students are referred to special education by their general education teachers or their parents. Behavior often plays a role in referrals. As the District works to improve its system of early intervention, it needs to ensure that there are clear processes for when and how a referral is made to special education. Comments were made that under some of the current practices in place, SSTs are a stepping stone to special education rather than a genuine intervention.
- ✦ Process and policies for data collection and records management: The District has recently implemented SEIS, which seems to be going well. The District has been late in incorporating technology as a management tool. As the District migrates to an online and electronic environment and reduces or phases out paper-based records, clear procedures are important to ensure that records are kept accurately and that confidentiality is protected.

Staff Development

Staff have seen a noticeable increase in training opportunities under the new Special Education Coordinator. There is generally very positive feedback about the training and meeting opportunities. The current budget crisis has been blamed for reducing availability to some

³ Education Code Section 56362(f)

training opportunities, which was expressed as a frustration because staff would like more training. Noted areas include behavior support training for all staff, including general education, placement, IEP management; cross training of instructional aides to ensure they can fill multiple roles, and curriculum.

The following topics were raised as areas of need for inservices in the future:

✚ Training for IEP teams

- Ongoing training on the District Special Education Procedural Handbook to reduce errors in IEPs and compliance
- Further training on identifying compliance problems and developing proactive solutions

✚ Site Level Training

- Training on the site's responsibilities for timelines, compliance issues, staff support, and staff evaluation in special education programs
- Training on how to review requests for SCIAAs (independence facilitators), so that the process is owned by the site and the behavior support plans are continuously monitored by the site level team.
- Using facilitated or managed IEP processes that work well with parents
- Training in research-based curriculum and materials for special education students
- Providing a blend of special and general education-related topics to special and general education staff during staff development days

✚ Training for general education staff

- Understanding students with learning differences
- Understanding the IEP—responsibilities and liabilities in implementation of the IEP
- Using successful SSTs to train less successful teams in a District-adopted and implemented process
- Providing support for general education staff to provide instruction for special education students in the least restrictive environment by differentiating instruction and meeting the needs of pupils with learning differences in general education
- Early intervention, such as Response to Intervention

✚ Training for parents

- Implementing Alternative Dispute Resolution trainings
- Implementing parent support networks by disability, perhaps in geographical feeder patterns
- Sharing good news about programs and staff in every community advisory committee (CAC) meeting
- Explaining special education law and the IEP process, including working collaboratively with the IEP team

✚ Mandatory Training for Administrators

- Providing training to reduce conflicts with parents (have some parents be part of the training)
- Providing mandatory training for administrators on the District's cultural change that emphasizes the District's and each site's responsibility to provide programming for all students, including those in special education, that will further improve the outcomes for all students
- Knowing how and when to say "no," including the basis for a free appropriate public education and educational benefit

✚ Trainings for Instructional Assistants

- Understanding confidentiality and special education
- Implementing behavior interventions
- Facilitating independence
- Supporting instruction

Recommendations and Options to Consider

14. If the District is able to reduce its overall number of students requiring special education services, especially those requiring speech and language services, the level of RSP and speech support would reach a point where RSP and/or speech caseloads will be too low to merit programs or services at individual sites. If speech caseloads drop, this should result in

immediate reductions to the contracted speech and language services. However, in the case of RSP, given that families are likely to prefer that their students be served by their neighborhood school, the District should review duties of RSP teachers and fund in a manner that reflects actual duties. RSP teachers currently have slightly-below-average caseloads, but average workloads. The District can and should utilize RSP teachers for intervention support at its sites; however, such time should be paid for from restricted resources, such as Title I or EIA. Currently, the District has 6.2 FTE serving as RSP. Based on the number of RSP students, if caseloads were closer to 28:1 (maximum legal number allowed), there would be around 5.3 FTE, or 1 FTE fewer. Such a shift could result in around \$80,000 in savings to the unrestricted general fund and would help ensure that intervention support is preserved at sites. Such action will require careful planning and coordination with site administrators and site councils.

15. Review level of instructional assistant support. The current assignments of IAs are based on a standard of practice that is grounded in culture steeped in past practice rather than current needs. Furthermore, in some cases there are nearly as many adults in the room as there are students, which raises concerns regarding whether the least restrictive environment is provided and certainly the cost of services. There needs to be an understanding developed that quantity is not quality. In addition, the District should carefully consider whether all of the current IA positions need to be 5+ hours or whether needs can adequately be met with 3.5-hour aides, which would result in substantial savings in benefits. The use of 3.5-hour aides could work especially well at the middle school level where aides can be working with multiple teachers and assigned to periods rather than classrooms.
16. Consider increasing psychologist support from 1.5 FTE to 2.0 FTE. The additional costs could be offset and overall savings possible by: (1) converting the positions from contracted services to District employees and (2) fund each position as 75% special education and 25% Title I or Economic Impact Aid as general education intervention counseling support. With this approach, the overall costs to the special education budget remain 1.5 FTE and the cost savings can come from savings by converting the positions to District employees. An added benefit is having full-time rather than multiple part-time positions, which can provide a greater continuity of service.
17. Prepare principals to take on more responsibility for the special education program. The Director of Special Programs and Special Education Coordinator are welcomed resources and considered to be experts, but they have served in some cases as an unnecessary crutch to principals. While the District has offered various training to administrators to improve their ability to support the special education program, not all administrators have participated. The District needs to require principals to participate in these trainings and also require that a principal or other site administrator attend all IEP meetings. If the District expects each site

to take ownership of its special education program, it needs to create the structures and conditions for this to occur.

18. Continue to provide training and meeting opportunities to all types of staff. This would be an ideal use of remaining ARRA IDEA funds since it represents a one-time investment that has the potential to improve program quality and reduce program costs for years to come. One area that could provide significant benefits in terms of overall education program quality and costs for special education services, is to invest in training and support all staff in the implementation of Response to Intervention/Instruction. This approach is focused on early intervention support based on assessed student needs. It presumes that good first instruction, followed by appropriate interventions based on data and monitoring can meet the needs for most students with special education being one of many intervention options and only used where appropriate.
19. Complete the update of the procedures handbook and ensure that is followed and enforced. There are areas where the District has done an exceptional job documenting clear policies and procedures, but in many areas, procedures are lacking or not followed. The lack of clear procedures that are consistently monitored has resulted in inconsistent practices between sites and at times has increased the responsibilities of the Program Specialists. Consistent implementation of good practice is critical to operating a high-quality, cost-effective special education program. Once the policies and procedures are created, training for staff is critical to ensure that there is an understanding of what's appropriate. Having the procedural handbook online for staff allows easy access and easy revision to reflect changes in law and good practice.

Conclusion

South Whittier School District is to be commended for the many high-quality special education programs it operates. At the same time, the District realizes that it can do a better job of improving the quality and cost-effectiveness of its programs.

Our overriding recommendation is for the District to implement a “culture change” so that special education isn’t seen as a separate program that is “someone else’s” responsibility. Many of the disputes with parents stem from inappropriate interactions early in the process. Doing things right the first time and thus eliminating avoidable, costly mistakes will certainly help to control costs for special education in the long run. We believe that implementing a culture change so that all staff are responsible for all pupils is critical to the District’s success.

Some of the recommendations in this report will be relatively easy to implement, such as increasing training support. Other recommendations, such as considering reorganization of how

special education support services are managed, require significant planning work between school sites and the District Office. We recommend that a district the size of South Whittier start by piloting new strategies and approaches to see what impact the change will really have.

This report contains many recommendations, and it is certainly not possible to implement all of them within a short period of time. Instead, District staff should identify those recommendations that are seen to yield the greatest benefit, and then prioritize them, specifying who is responsible for implementing each item and the timeline for implementation, along with periodic review to ensure that progress is being made.

While this report contains a number of areas where improvements can be made, we also recognize the commitment and expertise of District staff. We are confident that all District staff, working together as a team, will be able to make many positive changes toward the goal of operating a high-quality and cost-effective special education program.