

# **Fiscal Crisis & Management Assistance Team (FCMAT) Special Education Review**

## **June 17, 2024**

### **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.

FCMAT was created by Assembly Bill 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 Los Angeles County, Palisades Charter High School is an independent charter school serving students from throughout the Los Angeles area. According to [DataQuest](#), the charter school enrolled a total of 2,959 students in grades 9-12 during the 2022-23 academic year. It is a member of the Los Angeles Unified School District Special Education Local Plan Area (SELPA), which is a regional service delivery model for special education. In 2022-23, 8.35% of the school's grade 9-12 students were identified as requiring special education, which is much lower than the statewide grade 9-12 charter school average of 13.20%.

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

## Study and Report Guidelines

FCMAT visited the school on April 23 and 24, 2024 to interview administrators, special education teachers, related service providers, and special education 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 and clarity. In addition, this guide emphasizes plain language, 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 Colleen Patterson, MBA, CMA  
FCMAT Intervention Specialist FCMAT Consultant

John Lotze  
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 school has a full continuum of special education options and services, enabling it to offer students a free appropriate public education (FAPE). It met all three targets that measure least

restrictive environment (LRE) on its most recent local level annual performance report, which is commendable.

To support the inclusion of students with disabilities, the school offers a collaborative teaching program in which a general education teacher and a special education teacher are paired and co-teach in a general education setting. This is an industry-standard best practice and improves students with disabilities' access to their typically developing peers and rigorous instruction given by a general education teacher using the general education curriculum. The school could strengthen its collaborative teaching program by providing training for general education and special education teachers in at least the different co-teaching models, how to co-plan and co-teach, and how to differentiate instruction and plan for the needs of all learners. In addition, training addressing how to build the school's master schedule to support collaborative teaching should be prioritized.

The school also has a pull-out program for students with disabilities who are working to meet general education standards. Academic pull-out courses parallel the school's general education academic courses but are self-contained, taught by a special education teacher, and serve only students with disabilities. Offering a separate academic course for students with disabilities who are working to meet general education standards is counter to the 2015 report on one system and causes students with disabilities to lose access to their typically developing peers and the academic rigor of a general education class setting. The school should develop a plan to reduce the number of pull-out academic courses offered and increase the number of general education classes that use collaborative teaching.

The school also offers pull-out study skills courses for students with disabilities. Staff reported a wide variability in how these courses are structured because there are no standards for these courses. The best practice is for study skills courses to focus on individualized instruction that addresses a student's individualized education program (IEP) goals; whole group instruction designed to build executive functions, self-advocacy, and study skills; and services to support a student's transition to adult living. The school should establish standards and curricula for its study skills courses.

### **Individualized Education Program Meetings**

The best practice is for schools to use a schoolwide calendar at the start of each school year to plan for IEP meetings. The school introduced a schoolwide IEP calendar this year, but it was not used to schedule meetings at the beginning of the school year. The school should expand use of its schoolwide IEP calendar to schedule as many annual and triennial IEP meetings as possible. This would help distribute the workload for all staff who perform assessments, write IEPs, and attend as the administrative designee. It would also ensure that a private space can be reserved for all IEP meetings. The school would benefit from training additional staff members to serve as administrative designees for IEP meetings. It is also best practice to use IEP meeting agendas to encourage compliance with the Individuals with Disabilities Education Act's (IDEA's) procedural requirements and to help ensure IEP meetings are conducted in a sequence that leads to the school making a defensible offer of a free and appropriate public education (FAPE). The school should develop meeting agendas, use them consistently, and train staff in their use.

### **Administrative and Teacher Staffing**

The school's special education administrative and support staffing is similar to that of comparable school districts and charter schools FCMAT surveyed. Schoolwide resource specialist

program (RSP) teacher staffing is slightly higher than the Education Code (EC) 56362(c) standard but is needed to support the school's inclusive model. The schoolwide mild-to-moderate special day class (SDC) caseload average is slightly higher than the industry-standard range, and its moderate-to-severe SDC caseload is slightly lower than the industry-standard range. The school should review its caseload projections and student needs for 2024-25 to determine whether it needs to adjust RSP or SDC teacher staffing.

### **Instructional Aide Staffing**

The school has 16 special education instructional assistants, almost all of whom provide 1-to-1 student support. The school does not assign any special education instructional assistants to support the RSP or SDC programs. The school should evaluate whether assigning special education instructional assistants to its RSP and SDC programs according to industry-standard staffing levels and adult-to-student ratios would allow it to provide better support for students.

Staff reported that the school does not use a special circumstances instructional aide (SCIA) assessment process to determine whether a student requires 1-to-1 support from a special education instructional assistant. Using an SCIA assessment is the best practice because it clarifies decision-making and procedures, and is in keeping with the fact that assigning 1-to-1 student support is a significant decision that should be based on a thorough, data-driven evaluation that includes consideration of all less restrictive alternatives.

The school should adopt an SCIA assessment process, train staff, and use it consistently to determine the need for 1-to-1 special education support.

### **Related Service Provider Staffing**

The school contracts with nonpublic agencies for its adapted physical education (APE) teacher, teacher of students who are deaf or hard of hearing, occupational therapist, physical therapist, and speech and language pathologist. This is appropriate because its students' needs do not require a full-time staff person in any of these areas.

The school has a 1.0 full-time equivalent (FTE) credentialed school nurse, which is 0.30 FTE less than the industry-standard staffing for credentialed school nurses. The school has been unable to recruit an additional credentialed school nurse. Thus, for the 2024-25 school year it added 20 days to its credentialed school nurse's contract and is currently recruiting for a health services assistant.

The school has 2.0 FTE school psychologists, which is 1.02 FTE less than the industry standard for school psychologists. Because the school should be using an SCIA assessment to determine the need for 1-to-1 student support and because this process is facilitated by the school psychologist, the school would benefit from increasing school psychologist staffing to align with industry standards. The school hired an additional 1.0 FTE school psychologist for 2024-25.

### **General Fund Contribution to Special Education**

The school's adjusted 2022-23 unrestricted general fund contribution to special education was \$2,010,771, or 37.34% of total special education costs. This figure is less than the last available 2021-22 statewide average of 64.3% as calculated by School Services of California.

*Fiscal Crisis and Management Assistance Team - Palisades Charter High School*