

## Special Education Review

January 30, 2025



San Francisco Unified  
School District

Michael H. Fine  
Chief Executive Officer

January 30, 2025

Dr. Maria Su, Superintendent  
San Francisco Unified School District  
555 Franklin Street, San Francisco, CA 94102

Dear Superintendent Su:

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

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

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

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

Sincerely,



Michael H. Fine  
Chief Executive Officer

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# About FCMAT

## Purpose and Services

FCMAT was created in 1991 by the California Legislature to help California's TK-14 local educational agencies (LEAs) avoid fiscal insolvency. Today, FCMAT helps LEAs identify, prevent and resolve financial, management, program, data, and oversight challenges; provides professional learning; produces software, checklists, manuals and other tools; and offers other related school business and data services.

FCMAT may be asked 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 FCMAT is asked for help with management assistance or a fiscal crisis, FCMAT management and staff work closely with the requesting LEA to meet their needs. Often this means conducting a formal study using a FCMAT study team that coordinates with the LEA for on-site fieldwork to evaluate specified operational areas and subsequently produces a written report with findings and recommendations for improvement.

For more immediate needs in a specific area, FCMAT offers short-term technical assistance from a FCMAT staff member with the required expertise.

To help meet the need for qualified chief business officials (CBOs) in LEAs, FCMAT offers four different CBO training and mentoring programs that consist of 11 or 12 diverse two-day training sessions over the course of a full year.

For agencies with professional learning needs, FCMAT offers workshops on specific topics. Popular topics include associated student body operations, use of FCMAT's Projection-Pro online financial forecasting software, use of FCMAT's Local Control Funding Formula (LCFF) Calculator, and data reporting for the California Longitudinal Pupil Achievement Data System (CALPADS). FCMAT staff and management also frequently make presentations at various professional conferences.

The California School Information Services (CSIS) service of FCMAT helps the California Department of Education (CDE) operate CALPADS; helps LEAs learn about CALPADS, resolve data issues and meet reporting requirements; provides LEAs with training and leadership in data management; developed and continues to host and improve the Standardized Account Code Structure (SACS) web-based financial reporting system for all California LEAs; and provides ed-data.org, which gives educators, policymakers, the Legislature, parents and the public quick access to timely and comprehensive data about K-12 education in California.

Since it was formed, FCMAT has provided LEAs with the types of help described above on more than 2,000 occasions.

FCMAT's administrative agent is the Kern County Superintendent of Schools. FCMAT is led by Michael H. Fine, Chief Executive Officer, and is funded by appropriations in the state budget and modest fees to requesting agencies.

Workshop schedules, manuals, presentation slide decks, Projection-Pro software, LCFF calculators, past reports, an online help desk, and many other resources are available for download or use at no charge on FCMAT's website.

## **History**

FCMAT was created by Assembly Bill (AB) 1200 in 1991. In 1997, AB 107 charged FCMAT with responsibility for CSIS and its statewide data management work, and AB 1115 in 1999 codified CSIS' mission.

AB 1200 created 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) gave FCMAT specific responsibilities for 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 include these 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 oversight responsibilities from the state to the local county office of education to be more consistent with the principles of local control, and giving FCMAT new responsibilities associated with the process.

# Introduction

## Background

The San Francisco Unified School District is the city and county of San Francisco's only public school district. According to DataQuest, 55,452 students in grades transitional kindergarten through 12 (TK-12) were enrolled in 2023-24. As a single-district county, the district and the San Francisco County Office of Education are administered and governed by the same seven-member board of trustees. According to DataQuest, 468 students were enrolled in the San Francisco County Office of Education in 2023-24. Throughout this report the San Francisco Unified School District and San Francisco County Office of Education are referred to as "the district/county" because most staff do not differentiate between these two local educational agencies (LEAs). However, recommendations to distinguish the district's and the county office's special education programming from one another are discussed in the "District/County Continuum of Service Options" section of this report. In 2023-24, 13.59% of the district/county's students were identified as requiring special education, which is an increase of 2.07 percentage points since 2019-20.

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

## Study and Report Guidelines

FCMAT visited the district/county on October 22-24, 2024, to conduct interviews with central office and school administrators, special education teachers, related service providers, and special education paraeducators. 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 and its own short internal style guide, which emphasize plain language, capitalize relatively few terms, and strive for conciseness, clarity and simplicity

## Study Team

The study team was composed of the following members:

Carolynne Beno, Ed.D., CFE  
FCMAT Chief Analyst

Colleen Patterson, MBA, CMA  
FCMAT Consultant

John Lotze  
FCMAT Technical Writer

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

# Executive Summary

## Identification for Special Education

According to DataQuest, the district/county's census day enrollment has declined over the past five years, but its special education enrollment has increased. In 2023-24, 13.59% of the district/county's students in grades transitional kindergarten through 12 (TK-12) were identified as requiring special education, which was slightly less than the statewide average. This is a 2.07 percentage point increase since 2019-20.

Identifying students for special education when they do not require specialized instruction is not a best practice and increases special education costs. When they are not enrolled in special education, students experience less stigma, increased access to rigorous instruction in general education, and more interactions with their typically developing peers. Increases in the percentage of students identified for special education in the district/county appear to be caused by its student success team (SST) process, multitiered systems of support (MTSS), and eligibility determination process for special education, as described below.

## Student Success Team (SST) Process

All local educational agencies (LEAs) should have an SST process that identifies interventions to support students with learning differences and/or behavioral or social-emotional needs before a special education assessment is considered. The district/county has not set an expectation that all schools use its SST process, and it does not monitor, support, or require its consistent use. Staff reported that some schools have an SST process that provides intervention and support for students through the general education program, but that many schools do not have such a process. Factors that contribute to this include a lack of schoolwide intervention and support, and a belief that the SST process is a pathway to a special education assessment instead of an opportunity for a student to receive general education interventions that meet their differing needs.

## Multitiered System of Support (MTSS)

MTSS is a framework that aligns academic, behavioral, and social-emotional learning with one another. Staff reported that district/county schools provide interventions to address certain student learning differences, and/or behavioral and social-emotional needs. However, staff reported that the quality and completeness of interventions and supports vary from school to school, and there are no standard districtwide/countywide supports and interventions that address these types of needs. This means that a student at one school may have access to intervention in the general education program but a student at a different school may not.

## Eligibility Determination Process for Special Education

Special education should be reserved for students who are eligible to receive these specialized services. To be eligible for special education, a student must qualify by meeting a two-part test with the following criteria:

- They must meet the definition of one of the 14 disability categories in the Individuals with Disabilities Education Act (IDEA).
- They must need specially designed instruction.

Staff reported that the district/county does not consistently apply the two-part test to determine if a student qualifies for special education during their initial individualized education program (IEP) meeting. Staff

reported that this occurs because some schools lack general education interventions and supports, so staff believe that qualifying a student for special education is the only way to ensure that a student will receive the support they need. In addition, staff indicated that some students are not being exited from the special education program using the two-part test at their triennial IEP meeting because of factors such as parent pressure for the student to remain in special education.

## **Continuum of Special Education Services**

A special education local plan area (SELPA) must ensure that a continuum of special education service options is available to meet the needs of students with disabilities. Most LEAs offer different levels of specialized classes to meet the varying needs of these students, including LEA-based specialized classes, regional specialized classes that serve students throughout a SELPA, and nonpublic schools. Staff explained the district/county specialized classes for students with autism, extensive support needs, and behavioral/social-emotional needs are all considered district classes, and that they have not been differentiated to meet students' varying needs (e.g., by offering different adult-to-student ratios or levels of related service provider support). Because it lacks the various levels of classes specially designed to meet differing student needs that most other SELPAs have, the district/county may be missing an opportunity for a district/county class to meet the needs of students who may otherwise need to be referred to a nonpublic school (NPS).

The district/county needs to analyze the needs of students in its special day class (SDC) programs for students with autism, extensive support needs, and behavioral/social-emotional needs to determine how it may be able to expand the continuum of services it offers by distinguishing district from county classes. Specialized county classes should have clearly defined differences in students' needs, class sizes, and levels of support from related service providers such as behaviorists. Once it has such classes, the district/county will need to determine whether the needs of students who currently attend an NPS can be met in a county class instead, and transition those students back to county classes.

## **Special Education Staffing**

The district/county does not use statewide guidelines and/or industry standards to determine staffing for its special education program. The district/county has a document titled *Special Education School Site Staffing Guide School Year 2024-2025* (district/county staffing guide) that specifies staffing ratios for its special education program. Some ratios in this guide are aligned with industry standards; however, the district/county's special education staffing is not aligned with many of the ratios in the guide.

## **Resource Specialist Program**

In 2024-25, districtwide/countywide resource specialist program (RSP) staffing was 248.80 full-time equivalent positions (FTE), which is 69.73 FTE more than what is required to meet the Education Code (EC) 56362(c) standard. However, the students who receive support from a resource specialist are not evenly distributed into groups of 28 students across district/county schools. In addition the statewide caseload average observed in LEAs similar to the district/county that serve students using an inclusive model is lower than the caseload maximum specified in EC 56362(c). Thus, having more staffing than is required to meet the EC 56362(c) caseload maximum may be necessary.

The district/county's staffing guide specifies a 1-to-22 teacher-to-student ratio for the RSP, which is reasonable because the industry standard for specialized academic instruction (SAI)-based programs that serve students in their least restrictive environment (LRE) is 20-24 students per special education teacher.

However, in 2024-25, the district/county's RSP staffing is 20.89 FTE more than what is needed to achieve a 1-to-22 teacher-to-student ratio.

In addition, the district/county rarely shares a resource teacher between two schools when there are low caseloads at both schools. As a result, some schools have more staffing than needed to meet an RSP teacher to student ratio of 1-to-22 while others do not have enough staffing to meet this ratio, and eight schools have a lower RSP teacher-to-student ratio than the 1-to-28 required by EC 56362(c).

## **Special Day Class Programs**

In 2024-25, the districtwide/countywide mild-to-moderate SDC teacher caseload average is lower than the industry-standard range of 12-15 students per teacher at every school level. As a result, the district/county is staffed at 4.43 FTE SDC teachers more than what it would need to meet a caseload average of 12 students per teacher and 17.52 FTE SDC teachers more than what it would need to meet a caseload average of 15 students per teacher. This is because the district/county determines its staffing using a caseload range of 10-12 students per mild-to-moderate SDC teacher.

FCMAT was unable to determine whether the district/county's teacher staffing for SDCs for students with extensive support needs was aligned with the industry standards. Although the district/county offers different pathways for students with different needs, such as Autism, the district/county's data did not differentiate between cross-categorical and autism-focused SDCs, which have different caseload ranges.

## **Special Education Paraeducators**

The district/county staffing guide defines paraeducator staffing for SDC programs. However, the district/county's class size ranges do not match the industry standards, and because the district/county does not use an adult-to-student staffing ratio to determine paraeducator staffing, it may be over- or understaffed. Assigning more paraeducator support than necessary is costly and may limit the opportunities of students with disabilities to gain independence; however, not assigning enough paraeducators to an SDC can mean that students lack sufficient support and supervision. The district/county would benefit from adding an adult-to-student ratio to its paraeducator staffing guidelines for SDCs.

Although no industry standard exists for 1-to-1 paraeducators, in 2024-25, the district/county has 416.44 FTE 1-to-1 paraeducators providing intensive individual service (IIS). This is high for a district/county of this size compared to what is observed across the state. Although the district consistently administers its IIS assessment before assigning IIS, staff reported that some IEP teams recommend IIS for a student even though the IIS assessment does not demonstrate that need.

Assigning more paraeducator support than necessary is costly. In addition, although a parent/guardian or staff member's request for a student to have a 1-to-1 paraeducator may be well meaning, the University of Denver Colorado's Paraprofessional Resource & Research Center has identified possible negative consequences of doing so, which are outlined in the "1-to-1 Student Support" section of this report.

## **Related Service Providers**

In 2024-25, the district/county's staffing for adapted physical education teachers, credentialed school nurses, occupational therapists, physical therapists, school psychologists, and speech and language pathologists is considerably higher than what is needed to meet industry-standard provider-to-student ratios, as described in the "Related Service Provider Staffing and Caseloads" section of this report.

In addition, the district/county reported it has not attempted to recruit and hire district/county occupational therapists or physical therapists in many years. Because of this, it is increasing its costs by contracting for

37.9 FTE occupational therapists and 11.3 FTE physical therapists through a nonpublic agency (NPA). Hiring its own employees would both be more cost effective for the district/county and give it more control over the management of these providers.

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

In 2023-24, the district/county's adjusted unrestricted general fund contribution to special education was \$196,336,787, or 74.45% of total special education costs. In 2024-25, the district/county's unrestricted general fund contribution as a percentage of total special education costs, inclusive of indirect costs, was budgeted significantly lower and is projected to decrease to 73.86% based on first interim actual projections and the district/county budget.

# Findings and Recommendations

## Background and Context

### Transforming Education to Improve Outcomes for Students with Disabilities

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

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

The *Statewide Special Education Task Force Project Summary* states the following:

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

This project summary also explains that operating special education as a separate program is contrary to current research, stating the following about what such research suggests :

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

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

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

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

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

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

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

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

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

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

# District/County Alignment with the 2015 Report on One System

Congruent with tenets in the 2015 report on one system, staff described the district/county's special education program as a support for students with disabilities, not a place where students with disabilities go to receive a separate education. Staff articulated a strong belief that students with disabilities are general education students who are best supported by all general education, pupil services and special education personnel at each school. Staff identified access to general education settings and inclusive practices as critical facilitators of positive outcomes for students with disabilities. These core beliefs and values held by district/county educators provide a strong foundation for the inclusive, coherent system of education envisioned in the 2015 report on one system to support the success of students with disabilities.

However, incongruent with the principles in the 2015 report on one system, many staff interviewed reported that the special education department has historically operated in isolation from other district/county departments.

Many district/county departments have new staff in leadership positions. These leaders consistently identified the need for improved communication and collaboration between departments as important to their ability to do their jobs. However, there is a need for these leaders to recognize that the work they do in their department and in collaboration with other departments is shared work to accomplish the district's stated mission, which is to "provide each and every student the quality instruction and equitable support required to thrive in the 21st century."

## Recommendation

*The district/county should:*

1. Establish a culture that focuses on collaboration to promote positive outcomes for all students, including students with disabilities.

# Identification for Special Education

Before examining the district/county's special education staffing, continuum of special education services and unrestricted general fund contribution to its special education program, it is critical to think about those whom the program serves: the district/county's students who receive special education services. This section provides an overview of data and trends related to the district/county's students who receive special education services.

## District/County Enrollment

From 2019-20 through 2023-24, the district/county's census day enrollment for all TK-12 students decreased by 5,438 students, as shown in Figure 1 below.

**Census Day Enrollment of District/County Students in Grades TK-12, 2019-20 through 2023-24**

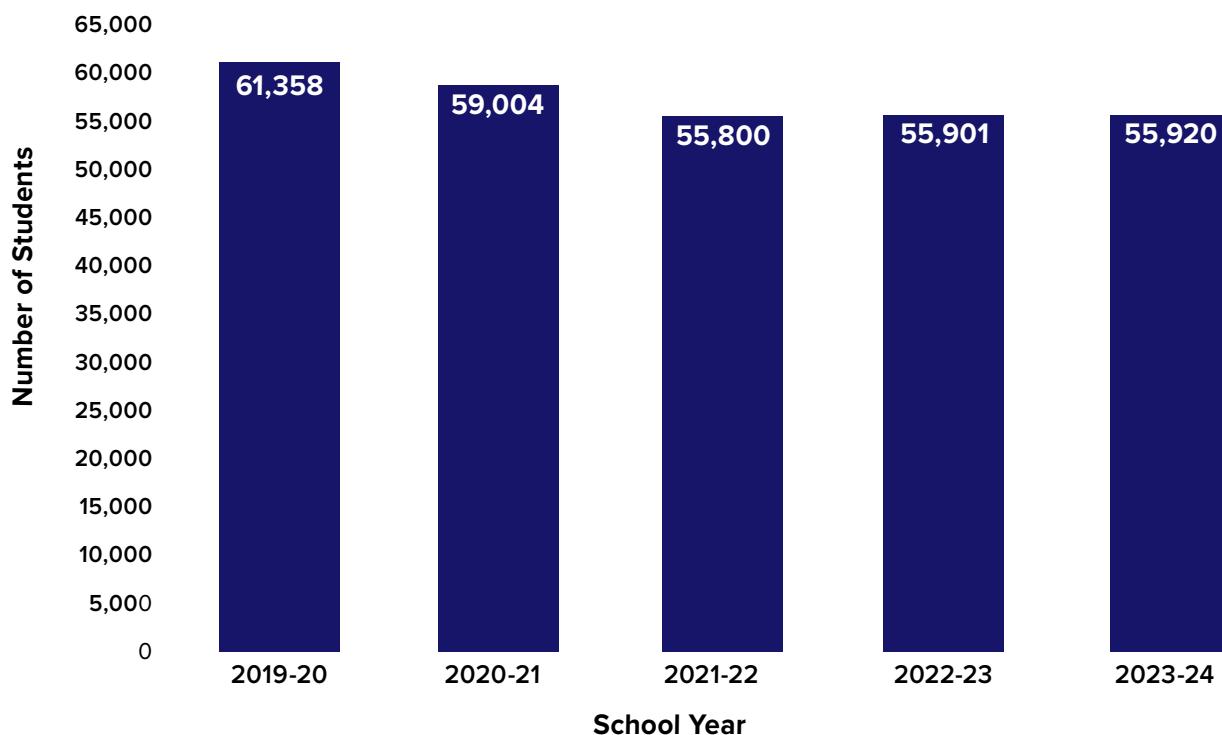


Figure 1. A chart showing an overall decline the district/county office census day enrollment for grades TK through 12 from 61,358 in 2019-20 to 55,920 2023-24, with a decline from 2019-20 to a low of 55,800 in 2021-22, followed by a slight increase from 2021-22 to 2023-24.

Source: Enrollment for Charter and Non-Charter Schools - San Francisco (CDE).

## District/County Special Education Enrollment

Although total district/county enrollment decreased from 2019-20 through 2023-24, special education enrollment in TK-12 increased by 534 students during that period, as shown in Figure 2 below.

### Number of District/County Students in Grades TK-12 Enrolled in Special Education, 2019-20 through 2023-24

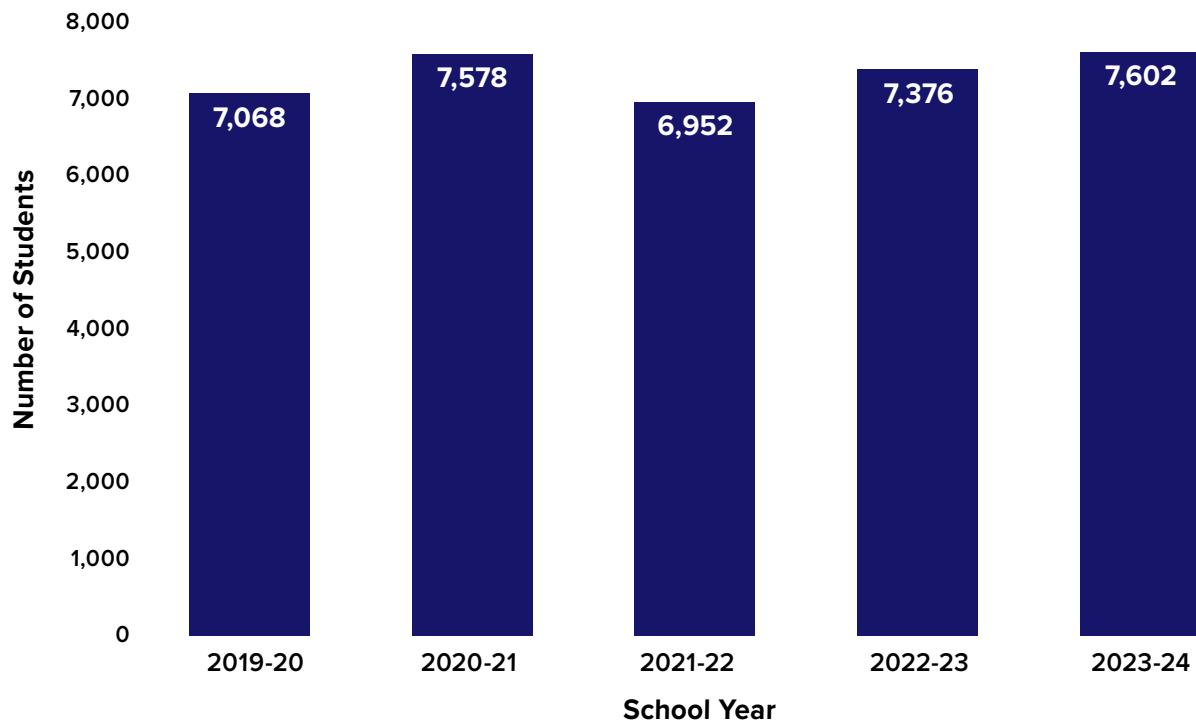


Figure 2. A chart showing an overall increase in the number of district/county TK-12 students enrolled in special education, from 7,068 in 2019-20 to 7,602 in 2023-24.

Source: Enrollment for Charter and Non-Charter Schools - San Francisco (CDE).

District/county students who identify as male are much more likely to be identified for special education than those who identify as female. The former group make up 52% of all students but 66% of students in special education, which is only slightly lower than the statewide average of 67% as calculated from DataQuest. The latter group make up 48% of all students but only 34% of students in special education. The higher representation of males in special education is influenced by factors such as referral bias (e.g., boys are more likely to be referred because of poor grades or behavior support needs) and differences in how teachers perceive student behavior (e.g., boys often draw more negative attention in school). Consequently, it is important for LEAs to analyze special education referral rates by gender and provide professional development as needed to address any disparities.

## District/County Special Education Enrollment by Disability Category

The IDEA defines thirteen categories of disability under which a school-age student may be eligible for special education. In 2024-25, approximately 97% of the district/county's TK-12 students enrolled in special education qualified under one of the six main disability categories shown in Table 1 below.

**Table 1: Percentage of District/County TK-12 Total Special Education Enrollment by Main Disability Category, 2019-20 and 2024-25**

	Emotional Disability	Intellectual Disability	Speech and Language Impairment	Other Health Impairments	Autism	Specific Learning Disability
2019-20	3.96%	5.48%	16.6%	15.31%	17.49%	35.89%
2024-25	3.53%	4.59%	15.43%	17.41%	23.08%	33.07%
Change	-0.43%	-0.89%	-1.17%	+2.1	+5.58%	-2.82%

Source: California Longitudinal Pupil Achievement Data System (CALPADS) report 16.1 for 2019-20 and CALPADS report 16.12 for 2024-25.

Notes: Although there are 13 disability categories under which a school-age student with a disability may qualify for special education, this table shows data only for the six most common in the district/county.

The main eligibility category of “emotional disability” was previously “emotional disturbance,” which is the term defined in the IDEA and used throughout the Education Code and the California Code of Regulations. However, Assembly Bill 2173, signed by the governor in July of 2024, permits California to use the less offensive term “emotional disability” in state law.

According to the [WestEd California Special Education Funding System Study](#), specific learning disabilities constitute the vast majority of identified disabilities for students in grades kindergarten through 12, followed by speech and language impairments and autism, respectively. In 2024-25, the district/county reported to the California Longitudinal Pupil Achievement Data System (CALPADS) that 33.07% of its TK-12 special education students were eligible due to a specific learning disability. Autism and other health impairment were the next two most common disability categories in the district/county, making up 23.08% and 17.41% of special education enrollment, respectively; this is different from the statewide trends identified by WestEd.

Significantly, from 2019-20 through 2024-25, the number of TK-12 students with autism enrolled in special education increased from 1,193 to 1,759, which is a 47.44% increase. This increase is discussed in the [“Continuum of Service Options”](#) section of this report.

## Disproportionality in Special Education Identification

The [National Association of School Psychologists](#) defines disproportionality as “the extent to which membership in a given group affects the probability of being placed in a specific disability category.” Simply, it is the under- or overrepresentation of racial or ethnic groups in special education.

## Racial and Ethnic Balance of Students

For most racial and ethnic groups, their representation as a percentage of total students enrolled in the special education was proportionate to their representation as a percentage of all district/county students.

However, in 2023-24, 40.33% of the district/county’s special education students identified as Hispanic or Latino, compared to 35.53% of the district/county’s total student population, and 13.21% of the district/county’s special education students identified as African American, compared to 7.53% of the district/county’s total student population. Conversely, 18.35% of the district/county’s special education students identified as Asian, compared to 28.16% of the district/county’s total student population.

This indicates an overrepresentation of students who are Hispanic, Latino or African American in special education and an underrepresentation of students who are Asian, as shown in Table 2 below.

**Table 2: Percentage of Students in Special Education, by Race and Ethnicity, Compared to Percentage of Total Student Population, 2023-24**

	Asian	African American	Hispanic or Latino	Not Reported	White	Two or More Races	Filipino	Pacific Islander	American Indian
Percentage of Total Enrollment	28.16%	7.53%	35.53%	3.74%	13.35%	7.38%	3.38%	0.71%	0.23%
Percentage of Special Education Enrollment	18.35%	13.21%	40.33%	5.52%	11.72%	6.83%	2.89%	0.86%	0.29%
Difference	-9.81%	+5.68	+4.8%	+1.78%	-1.63%	-0.55%	-0.49%	+0.15%	+0.06%

Source: [Enrollment by Ethnicity for Charter and Non-Charter Schools in 2023-24 - San Francisco \(CDE\)](#).

### Overrepresentation of Students who Identify as African American

The district/county was recognized by the CDE in its [Compliance and Improvement Monitoring \(CIM\) process](#) as “significantly disproportionate” because it overidentified students who are African American for special education in the disability categories of emotional disability (previously emotional disturbance) and other health impairment. An LEA identified as significantly disproportionate is required to take action, including reserving 15% of its IDEA funds to develop and implement a Compliance and Improvement Monitoring for Comprehensive Coordinated Early Intervening Services Action Plan (CIM for CCEIS Action Plan). The purpose of this plan is to identify and address any factors that contribute to disproportionality.

### Overrepresentation of Students who Identify as Hispanic or Latino

Although the reason for the district/county’s higher-than-expected identification of Hispanic and Latino for special education services is unclear, it is imperative that the district/county identify only qualifying students with disabilities. This is necessary for at least two reasons: first, even the most efficient special education programs do not receive enough funding to support their programs, so it is essential that these finite resources be used for qualifying students with disabilities; and second, although special education services are vital for students with disabilities, students identified for special education may experience stigma, reduced expectations, and less access to the general education curriculum and teachers. These factors can limit their academic achievement and outcomes.

The district/county needs to evaluate whether it overidentifies Hispanic and Latino students for special education. The Association of California School Administrators (ACSA) has published a brief titled, *The Disproportionality of Latinx Students in Special Education*, which discusses common causes of disproportionality of Hispanic and Latino students in special education and provides recommendations on how to address each of them. It would benefit the district/county to review this brief and use it to investigate its possible overidentification of Hispanic and Latino students in special education.

### Underrepresentation of Students who Identify as Asian

The district/county needs to investigate its lower-than-expected identification of Asian students for special education. The reason this is occurring is unclear; however academic literature is informative. A review of 15 academic studies examining the special education identification of Asian students<sup>2</sup>, (found that most stud-

<sup>2</sup> Kulkarni, S. S. (2017). Disproportionate representation of Asian students in special education: A systematic review of the literature. *Multiple Voices for Ethnically Diverse Exceptional Learners*, 17(2), 19-33.

ies reported an underrepresentation of Asian American students in special education because of factors such as the model minority myth, which stereotypes all Asian Americans as academically successful and hardworking while ignoring the diversity within this group; cultural differences and parental beliefs about the stigma of disability labels; and lack of proficiency in Asian languages in school districts.

It is imperative that the district identify all qualifying students with disabilities. Public schools are required under the IDEA to identify, locate, and evaluate all children who are suspected of having a disability. Failing to identify a student with a disability for special education can deprive the student of their rights to a free appropriate public education (FAPE) under the IDEA. This can impede the student's academic achievement and outcomes and may obligate the district to pay for compensatory educational services.

## English Learners in Special Education

In 2023-24, English learners made up 24.25% of all district/county TK-12 students but 27.94% of students in special education.

English learners are commonly overidentified for special education services, and this may be the case in the district/county as well. It would benefit the district/county to review its data annually to monitor for higher-than-expected identification of English learners in special education and provide professional development as needed.

## District/County Special Education Enrollment Compared to Statewide Enrollment

From 2019-20 through 2023-24, the percentage of district/county TK-12 students enrolled in special education increased by 2.07%, from 11.52% to 13.59%.<sup>3</sup>

FCMAT compared district/county total and special education TK-12 enrollment to statewide enrollment for 2023-24 (the latest data available). This data is shown in Table 3 below.

**Table 3: TK-12 Total and Special Education Enrollment Comparison, 2023-24**

2023-24	San Francisco Unified and San Francisco County Office of Education	California
Grades TK-12 Total Enrollment	55,920	5,837,690
Grades TK-12 Special Education Enrollment	7,602	799,980
<b>Percentage</b>	<b>13.59%</b>	<b>13.70%</b>

Sources: Enrollment for Charter and Non-Charter Schools - San Francisco (CDE) and Enrollment for Charter and Non-Charter Schools - State (CDE).

The district/county identified a slightly lower percentage of TK-12 students as requiring special education than the statewide percentage. Nonetheless, the district/county needs to identify and address factors that may be contributing to its increasing percentage of students in special education to ensure only qualifying students receive special education services.

<sup>3</sup> Source: Enrollment for Charter and Non-Charter Schools - San Francisco (CDE).

## **Increasing Percentage of District/County Students in Special Education**

Education Code (EC) 56303 states, “A pupil shall be referred for special educational instruction and services only after the resources of the regular education program have been considered and, where appropriate, utilized.” Identifying a student for special education before implementing general education interventions does not best serve the student. Students in special education can experience stigma, less access to the rigorous instruction given in the general education curriculum, limited interaction with their typically developing peers, and lower expectations, which can limit their progress and outcomes. In addition, serving a student in special education through an IEP is costlier than serving one through interventions and general education supports.

As mentioned in the [“District/County Special Education Enrollment Compared to Statewide Enrollment”](#) section of this report, from 2019-20 through 2023-24, the percentage of district/county students in grades TK-12 enrolled in special education increased by 2.07%. This increase appears to be influenced by at least the factors discussed below.

### **Student Success Team Process**

Before considering a special education assessment, students with learning differences and/or behavioral or social-emotional needs should be referred to a student success team (SST). This school-based team approach is designed to help students with a wide range of concerns related to their school performance and experience. SSTs are responsible for reviewing students’ strengths and weaknesses, identifying appropriate interventions, setting specific, measurable, achievable, relevant, and time-based (SMART) goals, and monitoring students’ progress toward these goals. An SST is composed of the student (if appropriate), the parent or guardian, and various school personnel such as counselors, resource specialists, speech pathologists, school psychologists, classroom teachers, and administrators. All LEAs should have an SST process.

The district/county has not set an expectation that all schools use its SST process, and it does not monitor, support, and require its consistent use. Staff reported that some schools have an SST process that effectively provides intervention and support for students in the general education program. However, staff also indicated that many schools do not have such a process because of factors such as a lack of schoolwide intervention and support opportunities, or the SST process being viewed and used as a pathway to a special education assessment instead of an opportunity for a student to receive appropriate general education interventions in response to their specific needs.

### **Multitiered System of Support**

California’s multitiered system of support (MTSS) focuses on aligning various initiatives, supports, and resources with content standards to meet the needs of all students. This integrated, comprehensive framework aligns academic, behavioral, and social-emotional learning and implements continual improvement processes throughout the educational system. It serves as a method of organization and uses data collected through universal screening to support decision making and problem solving. MTSS includes both response to instruction and intervention (RtI<sup>2</sup>) and positive behavioral interventions and supports (PBIS).

Staff reported that district/county schools provide interventions to address certain student learning differences and/or behavioral and social-emotional needs. However, staff also indicated that interventions and supports vary in comprehensiveness and quality from school to school, and that there are no standard countywide/districtwide supports and interventions to address a student’s academic, behavioral and social-emotional differences and needs. This means that a student at one district/county school may have access to intervention in the general education program but a student at a different district/county school may not.

## Determining Eligibility for Special Education

Special education should be reserved for students who are eligible to receive these specialized services. To be eligible for special education, a student must qualify by meeting the two-part test, which requires that they (1) meet the definition of one of the 14 disability categories in the IDEA, and (2) require specially designed instruction.

Staff reported that the district/county does not consistently use the two-part test to qualify students for special education at their initial IEP meeting. Staff reported that the IEP teams at some schools decide to qualify a student for special education even if they do not meet the test criteria because general education interventions and supports are lacking at their school. Staff said that they believe if they do not qualify the student for special education, the student will not receive support in the general education program to address their needs.

Not all students who initially qualify for special education services require those services throughout their school years. Students may exit special education at their annual or three-year (triennial) IEP meeting if they have demonstrated an ability to succeed in general education or no longer meet the definition of one of the IDEA's disability categories, and/or have acquired the skills they previously lacked, such as using intelligible speech or language skills.

Staff indicated that some students are not being exited from special education according to the two-part test at their triennial IEP meeting if they no longer qualify for special education. Staff indicated that parent pressure for the student to remain in special education is the largest factor preventing a student's departure from special education. However, keeping students in special education who do not require it is not a best practice. As previously mentioned, students experience less stigma, increased access to rigorous instruction given in general education, and more interactions with their typically developing peers when they are not enrolled in special education. A student's exit from special education is evidence of the student's and the program's success.

The following two strategies could help the district/county evaluate its special education entry and exit data and eligibility determination procedures:

1. Analyze its special education entry and exit data by at least school, grade level, and disability category to determine if there are notable trends. The district/county should consider using the [2020 Policy Analysis for California Education \(PACE\) brief, \*Students with Disabilities in the CORE Districts\*](#) as a guide. In this brief PACE used data from the [CORE districts](#) (Fresno, Garden Grove, Long Beach, Los Angeles, Oakland, Sacramento, San Francisco, and Santa Ana) and noted how students in these LEAs entered and exited special education and transitioned between special education disability categories. The district/county could compare its special education entry and exit data to trends identified in this PACE brief.

In addition, because it is one of the CORE districts in the brief, the district/county would benefit from collaborating with the other CORE districts to identify post-COVID-19 pandemic special education entry and exit trends. The other CORE districts are also large school districts, and this group has an established history of collaborating and testing improvement theories at the school and district level. The district/county would benefit from discussing challenges and best practices related to special education entry and exit in this post-COVID-19 pandemic context.

2. Review psychoeducational and speech and language assessments to identify several where the IEP team used the two-part test correctly to determine eligibility for special

education and several where the IEP team did not. Then, redact any student, staff or school identifying information from each assessment and have an attorney or expert witness (e.g., school psychologist or speech and language therapist) use the redacted documents when they provide training on special education entrance and exit criteria and best practices. This training should be provided for special education staff and staff who serve as the administrative designee at IEP meetings.

## Recommendations

*The district/county should:*

1. Annually monitor the percentage of students who qualify for special education and assess the proportionality of students in the special education group compared to the overall student population at least by gender, race, ethnicity, and English learner status. Provide training as needed in how to properly identify students for special education.
2. Continue to implement its CIM for CCEIS Action Plan to reduce its overrepresentation of African American students in special education.
3. Evaluate whether it overidentifies Hispanic and Latino students for special education. Consider using the ACSA brief, *The Disproportionality of Latinx Students in Special Education*, as a guide.
4. Set an expectation that all schools use a common SST process, and monitor, support, and require its consistent use.
5. Establish a districtwide MTSS, with tiers of interventions and supports to address a student's academic, behavioral, and social-emotional differences and needs. Provide training for all schools, and monitor, support and require its consistent use.
6. Analyze its special education entry and exit data at least by school, grade level, and disability category to identify trends. Consider comparing its special education entry and exit data to trends identified in the *2020 Policy Analysis for California Education (PACE)* brief, *Students with Disabilities in the CORE Districts*.
7. Collaborate with the other CORE districts to discuss post-COVID-19 pandemic special education identification trends, challenges, and best practices.
8. Provide professional development for special education and other staff who serve as the administrative designee at IEP meetings on how to properly determine special education eligibility using the two-part test.
9. Annually monitor special education entry and exit rates by school, grade level and disability category, and provide professional development as needed.

# Continuum of Service Options

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

The IDEA also requires that students with disabilities be educated in the least restrictive environment (LRE). To determine the appropriate setting for an individual student, their IEP team reviews the student's strengths and needs and considers the educational benefit of placement in different educational settings. LRE placement is assessed by the CDE, and the results are published in its local level annual performance report. These reports, which are required by the IDEA, evaluate districts on 14 indicators for which the target is deemed to be either met or not met.

## Preschool Least Restrictive Environment

In 2022-23, the district met two of the three targets for Indicator 6, which assesses the placement of preschool students in the LRE, expressed as a percentage of the total number of preschool students who receive special education services, as shown in Table 4 below. This report shows the district's, not the district/county's, preschool students in the LRE.

**Table 4: District's 2022-23 Performance on Indicator 6 — Preschool Students in the LRE**

Indicator	Indicator	Rate	Target	Target Met?
6a	Preschool LRE: Regular Program	47.35%	≥43.00%	Yes
6b	Preschool LRE: Separate Class	46.46%	<29.00%	No
6c	Preschool LRE: Home	2.21%	<3.50%	Yes

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

Despite not meeting one of the indicators for preschool LRE in 2022-23, the district demonstrated impressive improvement compared to 2021-22, when it did not meet any of the three indicators for preschool LRE. The district has been focused on improving preschool-age students' access to general education settings and needs to sustain this momentum.

## School-Age Least Restrictive Environment

In 2022-23, the district met two of the three targets for indicator 5, which assesses the placement of school-age students in the LRE, expressed as a percentage of the total number of school-age students who receive special education services, as shown in Table 5 below. This report shows the district's, not the district/county's, school-age students in the LRE.

**Table 5: District's 2022-23 Performance on Indicator 5 — School-Age Students in the LRE**

Indicator	Indicator	Rate	Target	Target Met?
5a	LRE Rate: In Regular Class More than 80%	67.98%	≥62.00%	Yes
5b	LRE Rate: In Regular Class Less than 40%	18.53%	<16.50%	No

Indicator	Indicator	Rate	Target	Target Met?
5c	LRE Rate: Separate Schools	0.84%	<3.00%	Yes

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

From 2021-22 through 2022-23, the district increased the percentage of students in special education who are in a regular class more than 80% of the time by 2.42% and continued to meet two of the three LRE indicators for school-age students. As described in the next section of this report, FCMAT found that the district has not reported all its data on students who attend nonpublic schools (NPSs), which would be counted as separate schools under Indicator 5c. This means that the district may not have met the LRE rate for Indicator 5c.

## District/County Continuum of Service Options

### Early Childhood Special Education Programs

School districts typically begin serving a student with a disability in preschool special education programs after a child's third birthday. However, because it is a single-district county and is its own SELPA, the district/county provides special education assessment and services to students from birth to age 5. The district/county offers the following early childhood special education programs:

- **Early Start Program**  
This is a statewide program that provides family-centered services and support to families of infants and toddlers from birth to 36 months of age who have developmental delays or disabilities. Individualized Family Service Plans (IFSPs) are developed to meet the needs of each child and family.
- **Standalone Speech and Language Services**  
At certain district schools, speech and language therapy is provided to eligible pre-school-age children who do not have other special education needs.
- **Itinerant Early Childhood Special Education Services**  
Itinerant teachers provide services for students ages 3 through 5 in their natural environment, which can include consultations with family and staff as well as direct support to the child. The goal of these services is to ensure progress toward a child's IEP goals, provide access to curriculum and typical peers, and maintain the child's current environment.
- **Integrated General Education Classes**  
Early childhood special education teachers monitor and support students in making progress toward their IEP goals in a general education setting.
- **Special Day Classes**  
Early childhood special education teachers provide intensive instruction in a separate classroom with a low student-to-teacher ratio to support progress toward IEP goals and peer engagement. These SDCs are noncategorical, which means they serve students in all disability categories.

## Support Needs of Preschool Age Students with Autism

School-age students with autism spectrum disorder (ASD) are more likely to be educated in more restrictive settings with less access to the general education curriculum and their typically developing peers than other students with disabilities<sup>4</sup>. Therefore, identifying the most important school readiness behaviors and foundational skills that a child with ASD needs to be taught in preschool are essential to improving their ability to participate in general education settings in their school-age years (Fleury, Thompson, and Wong, 2015). The National Clearinghouse on Autism Evidence and Practice (NCAEP) published a report in 2020 titled, *Evidence-Based Practices for Children, Youth and Young Adults with Autism*, which examines intervention literature and describes practices for which there is clear evidence of positive effects for children with ASD.

Accordingly, most LEAs offer specialized preschool programs that use evidence-based practices that have been shown to meet the unique needs of students with ASD. In contrast, the district's/county's preschool SDC programs are all cross-categorical, meaning that teachers work with students with various disabilities and needs; the district/county does not offer a specialized program for preschool age children with ASD.

As stated in the “District/County Special Education Enrollment by Disability Category” section of this report, the number of TK-12 students enrolled in special education with a main disability category of autism increased by 47.44% from 2019-20 through 2024-25. This increase makes it even more critical for the district/county to evaluate its preschool program. The district/county needs to determine whether it is using the practices that intervention science has demonstrated are effective for preschool age students with ASD, and to determine whether it could provide better support for these students if it had classes specifically designed to meet their unique needs.

## School-Age Special Education Programs

All district/county schools offer special education services, and most students with disabilities can apply to attend a school of their choice. However, some highly specialized services for students with disabilities are available only at specific schools. The district/county offers numerous special education programs for school-age students, as described below:

### General Education with Special Education Support

All district/county schools serving students in grades TK-12 offer accommodations, modifications, supplementary aids, and/or supports designated in a student’s IEP. Students in this program are assigned to a general education classroom for most of the school day and have a special education case manager.

### Resource Specialist Program

All district/county schools serving students in grades TK-12 offer a resource specialist program (RSP) where students are in a general education classroom for most of the school day. Services focus on accessing grade-level content with grade-level peers, as well as individualized instructional supports. Students in this program are assigned to a special education teacher (a resource specialist) as case manager. Resource specialist services are provided in the general education classroom and/or a separate setting as indicated in a student’s IEP.

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<sup>4</sup> American Psychiatric Association. (2013). *Diagnostic and Statistical Manual of Mental Disorders* (5th ed.). Arlington, VA: American Psychiatric Publishing.

## Separate Class or Special Day Class

Some district/county schools offer separate, smaller classes with specialized services. Students in this program are assigned to a separate multigrade class for most of the day and are assigned a special education teacher. Instruction focuses on students accessing common core standards through accommodations,

modifications, and specialized academic instruction (SAI). The district/county provides the following special day class (SDC) programs:

- **Autism-Focused (Mild-to-Moderate Needs)** — Programs enriched with evidence-based practices and supports to help students with ASD develop academic, behavioral, and social skills. Student goals are focused on functional communication training, social pragmatics, and self-management skills.
- **Autism-Focused (Extensive Support Needs)** — Programs enriched with evidence-based practices and supports help students with ASD develop preacademic, behavioral, and social skills. Student goals are focused on learning-readiness, adaptive (self-care) skills, communication, and independence.
- **Cross-Categorical (Mild-to-Moderate Needs)** — SDCs in which students spend most of their day in a special education classroom, with integration in general education as appropriate.
- **Cross-Categorical (Extensive Needs)** — SDCs in which students are focused on basic academic, functional, and life skills. Students participate in community-based instruction and are included as appropriate in the general education curriculum and program.
- **Learning Center** — A program in which students receive pull-out intervention for a large percentage of the day but are assigned to a general education classroom.
- **Success, Opportunity, Achievement, Resiliency (SOAR) (Mild-to-Moderate Needs)** — SDCs enriched with therapeutic and behavior supports to help reduce behavioral excesses and develop skills in self-awareness, self-management, social skills, and responsible decision-making. Students typically require instruction in the separate setting for more than 50% of the day until they gain skills to access learning in a general education classroom.
- **Deaf and Hard of Hearing Auditory/Oral and Total Communication (Mild-to-Moderate Needs)** — SDCs in which students are in a separate deaf/hard of hearing auditory oral or total communication classroom for more than 50% of the day. Depending on a student's IEP, a sign language interpreter may enable the student to access general education classes and extracurricular activities as appropriate.
- **Access Transition Program** — SDCs for adult students until they are 22 years of age. Programming includes post-secondary education, and employment and independent living skills.

## Students Who Attend a Nonpublic School

In addition to in-district/county program options, some district students with IEPs attend an out-of-district/county program at nonpublic schools (NPSs). NPSs are privately operated, publicly funded schools that specialize in providing educational services for students with exceptional needs that cannot be met in a traditional public school setting.

FCMAT found discrepancies between the number of district/county students reported to be attending an NPS in DataQuest (based on data the district/county reported to CALPADS), the district/county's special education information system (SEIS), the district/county's student information system (SIS), and spreadsheets provided by the district/county that track the number of students attending an NPS.

According to [DataQuest's 2023-24 Special Education Enrollment by Grade Report](#), the San Francisco County Office of Education reported 80 students were attending an NPS, and San Francisco Unified reported no students attending an NPS. In 2023-24, based on data provided by the district/county, FCMAT estimates that the district/county had 141 students attending an NPS, which is 61 students more than it reported to CALPADS.

Staff stated that the district/county has historically underreported to CALPADS the number of students in special education who attend an NPS. Staff explained that this has occurred because the student data in its SIS and SEIS do not match. The district/county reported it has historically recorded all students who are attending an NPS in its SIS as San Francisco County Office of Education students. However, the LEA for some students who attend an NPS was not listed in SEIS as the San Francisco County Office of Education. This created an error when the district/county CALPADS administrator attempted to certify and transmit district/county data to CALPADS. Staff explained that in some cases the district/county CALPADS administrator changed the data to remove from enrollment students who were attending an NPS but whose records were generating errors so that the county/district could certify and report its data. Therefore, data for certain students attending an NPS was not submitted to CALPADS.

To correct this issue, staff stated, in 2024 the district/county began enrolling and reporting all students who attend an NPS as San Francisco Unified students in both its SIS and SEIS. In addition, staff are comparing reports from the district/county's SIS and SEIS regularly to identify and correct any LEA mismatches of students attending an NPS.

Not correctly reporting the number of these students in CALPADS has two significant consequences. First, because student data is not just about numbers but tells a story of district/county students, not reporting it for all students who attend an NPS means that the district/county is not telling an accurate story about its students. Second, the CDE uses the district/county data to measure indicator 5c on its annual performance report, LRE rate for separate schools such as an NPS. If this data is not reported correctly, then indicator 5c referenced in the ["Continuum of Service Options"](#) section of this report is not accurate.

In addition, the district/county may not be collecting funding for all its students who are attending an NPS, including funding based on average daily attendance (ADA). For example, in 2023-24, FCMAT found discrepancies in district/county-reported data, as shown in Table 6 below.

**Table 6: Number of District/County Students Reported Attending an NPS vs. District Records, 2023-24**

School Year	Number of District/County Students Reported as Attending an NPS in CALPADS	District P-2 ADA of Students Attending an NPS*	NPS Enrollment Reported on District/County NPS Tracking Spreadsheet
2023-24	80	94.47	141

Sources: DataQuest's 2023-24 Special Education Enrollment by Grade Report, CDE Funding Exhibits - Second Principal Apportionment, and district-provided data.

\*This includes students in NPSs, licensed children's institutes (LCIs), extended year NPSs, and community day school.

The P-2 ADA that the district/county collected for students attending an NPS in 2023-24 was more than the number of students the district/county reported to CALPADS as attending an NPS. However, it was signifi-

cantly less than the number of students on the district/county's NPS tracking spreadsheet and the number of students it made payments for who were attending an NPS. In addition, the ADA reported includes ADA for students who attend community day schools, so the ADA reported for students attending an NPS in 2023-24 appears to be based on the number of students reported to be attending an NPS in CALPADS instead of the actual NPS enrollment.

The [National Center for Education Statistics](#) reported that San Francisco Unified received \$23,716 in total revenue (federal, state and local) per student in 2020-21 (the most recent year for which this data is available). Therefore, it is essential that the district/county report the enrollment and ADA for all its students who attend an NPS to ensure it does not lose revenue.

## Differentiating District from County Special Education Programs

A special education local plan area (SELPA) must ensure that a continuum of special education service options is available to meet the needs of students with disabilities. Most LEAs are part of a multiple-LEA SELPA (i.e., two or more district or charter LEAs which do not include a county office of education (COE)) or a COE-joined SELPA (i.e., one or more district or charter LEAs join one or more COEs). An LEA that is a member of a multiple-LEA or COE-joined SELPA typically can offer and provide a student with a FAPE that includes placement in different levels of specialized classes to meet the differing needs of students with disabilities. Three common specialized class levels are described below.

1. **District or Charter LEA-Based Specialized Classes** — These classes are run by a district or charter LEA for students in their own LEA. Specialized classes may be designed for students with a particular need (mild-to-moderate or extensive) or who qualify for special education under a specific disability category such as autism or emotional disability.
2. **Regional Specialized Classes** — These classes are offered regionally for students throughout a SELPA and may be operated by a COE or a district or charter LEA in the SELPA. Regional specialized classes typically serve students who qualify for special education under a specific disability category such as autism or an emotional disability, or who have extensive needs.
3. **Nonpublic Schools** — The most specialized classes are typically operated by an NPS and serve students whose needs cannot be met in a regional specialized class.

A student attending the first type of specialized class above typically has fewer needs than a student attending the second or third types of specialized classes. Accordingly, these latter two types of classes typically have a lower student-to-staff ratio and a higher level of support from related service providers such as behaviorists.

Because it is a single district/county SELPA, most staff in the district/county do not differentiate between district and county special education programs. The only exceptions to this are the Early Start program for infants and toddlers with developmental needs and the McAuley Counseling Enriched Education Program, which is an outpatient educational and therapeutic program run in partnership with the San Francisco Department of Public Health-Behavioral Health Services.

Staff explained that the district/county's specialized classes for students with autism, extensive support needs, and behavioral or social-emotional needs are all considered district classes, and that they have not been differentiated by different adult-to-student ratios or level of support from related service providers to meet varying student needs. This lack differentiation does not occur in most other SELPAs, and it may be causing the district/county to miss an opportunity to meet students' needs in a district/county class instead of placing them in an NPS.

The district/county needs to analyze the needs of students in its SDC programs for students with autism, extensive support needs, and behavioral/social-emotional needs to determine how it may be able to distinguish district from county classes. Specialized county classes should differ from specialized district classes based on clearly defined distinctions in student support needs, class sizes, and level of support from related service providers such as behaviorists. Once it has differentiated district and county specialized classes from one another, the district/county will need to analyze the support needs of students currently attending an NPS to determine if there are groups of students of similar age with similar support needs who could be moved from an NPS to a county-operated program. If the district/county expands its continuum of services this way, information about this will need to be communicated clearly to all educational partners.

## Recommendations

*The district/county should:*

1. Continue to monitor what percentage of the school day students with IEPs spend in general education settings, with a focus on meeting or exceeding LRE targets in its Local Level Annual Performance Report.
2. Evaluate its preschool programs to determine if it is using the practices that intervention science has demonstrated are effective for preschool-age students with ASD.
3. Consider whether a preschool SDC program specially designed to meet the unique needs of preschool-age students with ASD would allow it to provide better support for students with autism.
4. Continue to regularly compare NPS enrollment data from its SIS and SEIS to identify and correct any LEA mismatches for students attending an NPS.
5. Instead of removing the enrollment record for a student when it generates an error in CALPADS reporting, correct any special education-related errors that prevent CALPADS data from being certified and reported.
6. Check its enrollment-to-ADA ratios to make sure it reports ADA for all students who attend an NPS.
7. Determine whether expanding its continuum of special education services by distinguishing between specialized district and county programs would enable it to serve additional students in a district or county program instead of an NPS.
8. Analyze the support needs of students who attend an NPS to determine if there groups of students of similar age with similar support needs who could be moved from an NPS to a county-operated program if the district/county were to expand its special education services.

# Special Education Teacher Staffing

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

## Resource Specialist Program Teacher Staffing

Education Code 56362(c) states:

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

The contract between the district and United Educators of San Francisco (UESF) specifies a maximum caseload of 27 students for resource specialist program (RSP) teachers.

In 2024-25, the district/county has 248.80 full-time equivalent (FTE) resource specialists. Based on caseload estimates provided by the district/county, these teachers manage the cases of 5,014 students, averaging 20.15 students per teacher, as shown in Table 7 below.

**Table 7: Resource Specialist Teacher Staffing, 2024-25**

School Level	Total Teacher FTE	Total Student Caseload	Average Teacher Caseload	Staffing Needed to Meet Education Code Standard	Staffing Above (+) or Below (-) Education Code Standard
Early Childhood	8.00	72	9.00	2.57	+5.43
Elementary School	77.00	1,559	20.25	55.68	+21.32
K-8 School	17.80	428	24.04	15.29	+2.51
Middle School	54.00	1,075	19.91	38.39	+15.61
High School	92.00	1,880	20.43	67.14	+24.86
<b>Total</b>	<b>248.80</b>	<b>5,014</b>	<b>20.15</b>	<b>179.07</b>	<b>+69.73</b>

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

Districtwide/countywide resource specialist staffing is 69.73 FTE more than what is required to meet the EC 56362(c) caseload standard. However, the students who receive support from a resource specialist are not neatly distributed into groups of 28 across district/county schools. Thus, having more staffing than is required to meet the EC 56362(c) standard may be necessary. In addition, the standard outlined in EC 56362(c) is based on a maximum caseload, which is higher than the statewide caseload average observed in LEAs that serve students using an inclusive model.

Although the definition of an inclusive model varies across California's school districts, the intent of such a model is to enable students to attend their neighborhood schools, progress through the grade levels that match their chronological ages, and access general education classes and curricula to the greatest extent possible. As described in the section of this report that discusses placement in the least restrictive environment, the district/county met four of the six indicators that measure LRE on its annual performance report and is operating an inclusive program. Accordingly, resource specialist staffing that exceeds the 1-to-

28 teacher-to-student ratio may be needed to provide sufficient services to meet students' needs; these services are based on factors such as the number of specialized academic instruction (SAI) minutes in a student's IEP and the percentage of time a student is in general education.

The district/county's staffing guide defines a resource setting for students with mild-to-moderate or extensive needs as including "push-in, pull-out, and collaborative teaching of SAI to access core curriculum and/or special class core instruction for less than 50% of day."

The district/county staffing guide sets two different teacher-to-student ratios for resource settings, which are based on a student's support needs, as shown in Table 8 below.

**Table 8: District/County Special Education Teacher Staffing Guidelines**

Number of Students by their Support Needs	Number of Special Education Teachers
For every 28 students with mild-to-moderate support needs in general education classes for greater than 50% of the instructional day.	One mild-to-moderate support needs or one extensive support needs credentialed education specialist.
For every 16-22 students with extensive support needs in general education class for greater than 50% of the instructional day.	One mild-to-moderate support needs or one extensive support needs credentialed education specialist.

Source: District/County Special Education School Site Staffing Guide School Year 2024-2025.

The district/county staffing guide, taking into consideration the support need/service level and percentage of the instructional day the student is in general education, accounts for students' needs and states the following: "we believe that if sites have appropriate levels of staffing and support given the specific needs, accommodations and modifications outlined in each student's IEP, we will ensure student success in meeting IEP goals and build their independence as learners." The staffing guide explains that staffing allocations will be made after analyzing the cumulative student needs per site, the special education pathway (program) and SAI minutes in students' IEPs, and contractual guidelines for case managers.

The district/county staffing guide also references the IDEA's mandate to serve students in the LRE and the district/county's commitment to inclusive practices. It states, "many students may receive instruction in the general education classroom for the majority of the day, including those with IEPs who require significant levels of service." Because some students with mild-to-moderate needs require higher levels of SAI, the district/county staffing guide uses a higher staffing ratio for students with high minutes of SAI, rather than only for those with extensive needs. Students with mild-to-moderate needs who require SAI for more than 90, 110, or 120 minutes per day for elementary, middle, and high schools, respectively, are allocated teachers at a 1-to-22 teacher-to-student ratio.

The district/county's contractual caseload ratios can also be modified depending on the students' eligibility and their instructional setting (i.e., general education resource setting or special class setting).

It is appropriate to allocate additional RSP teachers to support students with higher minutes of service and/or higher support needs. In addition, using a 1-to-22 teacher-to-student ratio is reasonable because the industry standard for SAI-based programs supporting students in their LRE is 20-24 students per special education teacher.

FCMAT did not determine how many of the district/county's students in the resource program required a 1-to-22 teacher-to-student ratio due to the students' needs and level of SAI based on the formula outlined in the district/county's staffing guide. However, in 2024-25 the district/county is staffed at 20.89 FTE more than what would be required if every resource program student qualified for the 1-to-22 teacher-to-student ratio, as shown in Table 9 below.

**Table 9: District/County Resource Specialist Staffing at a 1-to-22 Ratio, 2024-25**

	Total RSP Teacher FTE	Total RSP Student Caseload	Average Teacher Caseload	Total RSP Staffing Needed to Meet Teacher-to-Student Ratio of 1-to-22	Staffing FTE Above (+) or Below (-) District/County Staffing Guide Ratio of 1-to-22
2024-25 Districtwide/ Countywide Data	248.80	5,014	20.15	227.91	+20.89

Sources: District/county-provided data and District/County *Special Education School Site Staffing Guide School Year 2024-2025*.

The district/county has adopted a flexible and reasonable method to determine the number of special education teacher positions it needs, based on student support needs and SAI time. This method, using a 1-to-22 teacher-to-student ratio, is aligned with the industry-standard caseload for SAI-based programs.

However, the district/county does not use this method to determine staffing for its resource program. The main reason for this is that many district/county staff do not recognize that the resource program is overstaffed or the consequences of this problem. In addition, staff indicated that the Special Education Department has proposed RSP teacher reductions and attempted to move RSP teachers from schools with lower RSP student-to-teacher ratios to schools with higher RSP student-to-teacher ratios in the past, but these changes were not approved because of resistance from school staff or because the board of trustees did not approve the plan.

The industry-standard practice is to share a resource teacher between two schools when caseloads are low at both schools, but staff reported the district/county rarely does this. As a result, some district/county schools have more staffing than needed to meet an RSP teacher-to-student ratio of 1-to-22 while others do not have enough staffing to meet this ratio, and eight schools are below the RSP teacher-to-student ratio of 1-to-28 required to meet the EC 56362(c) caseload standard. Table 10 below shows only district/county schools that have more than 0.5 FTE more or less than the staffing needed to meet the RSP teacher to student ratio of 1-to-22. Resource specialist staffing data for all district/county schools is shown in [Appendix A](#).

**Table 10: District/County Resource Specialist Staffing at a 1-to-22 Ratio by School, 2024-25**

School	Total RSP Teacher FTE	Total RSP Student Caseload	Average RSP Caseload Per Teacher	Staffing Needed to Meet RSP Teacher-to-Student Ratio of 1-to-22	Staffing FTE Above (+) or Below (-) District/County Staffing Guide Ratio of 1-to-22
Washington (George) High School (HS)	10	250	25.00	11.36	-1.36
Galileo HS	6	160	26.67	7.27	-1.27
Lakeshore Elementary School (ES)	1	49	49.00	2.23	-1.23
Carmichael (Bessie) K-8	3	90	30.00	4.09	-1.09
Asawa (Ruth) SOTA HS	3	89	29.67	4.05	-1.05
Mission HS	7	174	24.86	7.91	-0.91

School	Total RSP Teacher FTE	Total RSP Student Caseload	Average RSP Caseload Per Teacher	Staffing Needed to Meet RSP Teacher-to-Student Ratio of 1-to-22	Staffing FTE Above (+) or Below (-) District/County Staffing Guide Ratio of 1-to-22
Burton (Phillip and Sala) HS	6	148	24.67	6.73	-0.73
Brown Jr. (Willie) Middle School (MS)	2	57	28.50	2.59	-0.59
Denman (James) MS	4	101	25.25	4.59	-0.59
Lilienthal (Claire) K-8	1	34	34.00	1.55	-0.55
Creative Arts K-8 Charter	1.8	51	28.33	2.32	-0.52
McKinley ES	1	33	33.00	1.50	-0.50
Tenderloin Community ES	1	33	33.00	1.50	-0.50
Jordan (June) HS	2	33	16.50	1.50	+0.50
Garfield ES	1.5	21	14.00	0.95	+0.55
Gateway MS Charter	6.5	128	19.69	5.82	+0.68
Hilltop HS	1	7	7.00	0.32	+0.68
The Academy - SF @ McAteer HS	2	29	14.50	1.32	+0.68
Youth Chance High School	1	7	7.00	0.32	+0.68
SF International HS	1	6	6.00	0.27	+0.73
Hoover (Herbert) MS	5	94	18.80	4.27	+0.73
C.A.R.E. Buchanan	1	5	5.00	0.23	+0.77
Harte (Bret) ES	2	27	13.50	1.23	+0.77
Lawton K-8	2	26	13.00	1.18	+0.82
Aptos MS	6	114	19.00	5.18	+0.82
Everett MS	3	47	15.67	2.14	+0.86
Sherman ES	3	46	15.33	2.09	+0.91
C.A.R.E. Bayview	1	1	1.00	0.05	+0.95
SF Civic Center Secondary HS	2	23	11.50	1.05	+0.95
King Jr (Dr Martin L) MS	4	66	16.50	3.00	+1.00
Marshall (Thurgood) HS	3	42	14.00	1.91	+1.09
Roosevelt MS	4	63	15.75	2.86	+1.14

School	Total RSP Teacher FTE	Total RSP Student Caseload	Average RSP Caseload Per Teacher	Staffing Needed to Meet RSP Teacher-to-Student Ratio of 1-to-22	Staffing FTE Above (+) or Below (-) District/County Staffing Guide Ratio of 1-to-22
Independence HS	5	81	16.20	3.68	+1.32
O'Connell (John) HS	6	98	16.33	4.45	+1.55
Downtown HS	3	24	8.00	1.09	+1.91

Source: District/county-provided data.

Notes: 8.0 FTE of the RSP teachers assigned to the preschool program and the 72 preschool students they support, and 4.0 FTE of the RSP teachers who were not assigned to a school and the 58 students they support, were removed for this analysis. The resulting dataset includes 236.8 FTE district/county RSP teachers, who manage the cases of 4,884 RSP students.

This table reports only the district/county schools that have greater than 0.5 FTE more or less than the staffing needed to meet the RSP teacher-to-student ratio of 1-to-22.

## Special Day Class Staffing

The Education Code does not define caseload maximums for SDC programs. Article 9.5.7 of the district/county's contract with UESF states, "A Special Day Class exists when there are students who receive special education instruction greater than 50% of their school day." The district/county staffing guide's student-to-teacher ratios for SDC programs are shown alongside industry standards in Table 11 below.

**Table 11: District/County Special Education Teacher Staffing Guideline and Industry Standards for SDC Programs**

District/County Special Education Pathway	District/County Staffing Guideline	Industry-Standard Caseload Range
Mild/Moderate Support Needs Special Day Class – Cross-Categorical	10-12 students per 1 teacher	12-15 students per 1 teacher
Mild/Moderate Support Needs Special Day Class – Autism Focus	10-12 students per 1 teacher	12-15 students per 1 teacher
Extensive Support Needs Special Day Class – Cross-Categorical	8-10 students per 1 teacher	10-12 students per 1 teacher
Extensive Support Needs Special Day Class – Autism Focus	8-10 students per 1 teacher	8-10 students per 1 teacher
SOAR Special Day Class – Mental Health and Behavioral Support Needs	8-12 students per 1 teacher	8-10 students per 1 teacher
Access (Community, Access and Transition for 18-22-year-olds)	10-12 students per 1 teacher	10-12 students per 1 teacher

Sources: District/County *Special Education School Site Staffing Guide School Year 2024-2025* and industry standards.

The district/county's SDC staffing guidelines for classes for students with mild-to-moderate and extensive support needs specify lower caseloads than the industry standards. The district/county needs to evaluate whether aligning its SDC caseload guidelines with industry standards would allow it to reduce costs while continuing to meet students' needs.

In the spring of 2024, the district and UESF agreed to change language in their contracts about caseloads for a few types of special education staff, including SDC teachers. Article 9.6.2, Caseload Overages, indicates that when the specified caseload is exceeded the unit member may receive overload pay, students may be reassigned to another student, or additional staff may be assigned to the school.

## School-Age Mild-to-Moderate Special Day Class Programs

In 2024-25, the district/county has 69.85 FTE SDC teachers of classes for school-age students with mild-to-moderate support needs. Based on caseload estimates provided by the district/county, these teachers manage the cases of 785 students, averaging 11.24 students per teacher, as shown in Table 12 below.

**Table 12: District/County Mild-to-Moderate SDC Program Teacher Staffing, 2024-25**

School Level	Total Teacher FTE	Total Student Caseload	Teacher Caseload Average	Industry-Standard Caseload Range	Staffing FTE Above (+) or Below (-) Industry Standard
Elementary School	34.85	381	10.93	12-15 students per teacher	+3.10 FTE (above 12 students per teacher) +9.45 FTE (above 15 students per teacher)
K-8 School	3.00	32	10.67	12-15 students per teacher	+0.33 FTE (above 12 students per teacher) +0.87 FTE (above 15 students per teacher)
Middle School	14.00	160	11.43	12-15 students per teacher	+0.67 FTE (above 12 students per teacher) +3.33 FTE (above 15 students per teacher)
High School	18.00	212	11.78	12-15 students per teacher	+0.33 FTE (above 12 students per teacher) +3.87 FTE (above 15 students per teacher)
<b>Total</b>	<b>69.85</b>	<b>785</b>	<b>11.24</b>	<b>12-15 students per teacher</b>	<b>+4.43 FTE (above 12 students per teacher)</b> <b>+17.52 FTE (above 15 students per teacher)</b>

Sources: District/county-provided data and industry standards.

The districtwide/countywide mild-to-moderate SDC teacher caseload average is below the industry-standard range of 12-15 students per teacher at every school level. As a result, the district/county is staffed with 4.43 SDC teacher FTE more than what it would need to meet a caseload average of 12 students per teacher and 17.52 SDC teacher FTE more than what it would need to meet a caseload average of 15 students per teacher. The district/county is staffed above the industry standard range because it determines its staffing using a caseload range of 10-12 students per mild-to-moderate SDC teacher. The district/county needs to determine whether raising its mild-to-moderate SDC caseload averages to match industry standards would allow it to decrease teacher staffing and still meet students' needs.

## SOAR Special Day Class Program

In 2024-25, the district/county has 9.00 FTE SDC teachers of classes for students with social-emotional and behavioral support needs. Based on caseload estimates provided by the district/county, these teachers manage the cases of 60 students, averaging 6.67 students per teacher, as shown in Table 13 below.

**Table 13: District/County SOAR SDC Program Teacher Staffing, 2024-25**

Program	Total Teacher FTE	Total Student Caseload	Average Caseload Per Teacher	Industry-Standard Caseload Range	Staffing FTE Above (+) or Below (-) Industry Standard
SOAR	9.00	60	6.67	8 -10 students per teacher	+1.50 FTE (above 8 students per teacher) +3.00 FTE (above 10 students per teacher)

Sources: District/county-provided data and industry standards.

The districtwide/countywide SOAR SDC teacher caseload average is less than the industry-standard range of 8-10 students per teacher. As a result, the district/county SOAR teacher staffing is 1.50 FTE above what it would need to meet a caseload average of eight students per teacher and 3.00 FTE above what it would need to meet a caseload average of 10 students per teacher. The district/county needs to determine whether raising its SOAR caseload averages to match industry standards would allow it to decrease teacher staffing and still meet students' needs.

## School-Age Extensive Support Needs Special Day Class Program

In 2024-25, the district/county has 41.00 FTE SDC teachers of classes for school-age students with extensive support needs. Based on caseload estimates provided by the district/county, these teachers manage the cases of 386 students, averaging 9.41 students per teacher, as shown in Table 14 below.

**Table 14: District/County Extensive Support Needs SDC Program Teacher Staffing, 2024-25**

School Level	Total Teacher FTE	Total Student Caseload	Average Caseload Per Teacher	Industry-Standard Caseload Range
Elementary School	15.00	138	9.20	8-10 students per teacher – Autism focus 10-12 students per teacher – cross-categorical
K-8 School	2.00	17	8.50	8-10 students per teacher – Autism focus 10-12 students per teacher – cross-categorical
Middle School	8.00	80	10.00	8-10 students per teacher – Autism focus 10-12 students per teacher – cross-categorical
High School	16.00	151	9.44	8-10 students per teacher – Autism focus 10-12 students per teacher – cross-categorical
<b>Total</b>	<b>41.00</b>	<b>386</b>	<b>9.41</b>	<b>8-10 students per teacher – Autism focus 10-12 students per teacher – cross-categorical</b>

Sources: District/county-provided data and industry standards.

FCMAT was unable to determine whether the district/county's teacher staffing for SDCs for students with extensive support needs were aligned with the industry standards. Although the district/county offers different pathways for students with different needs, such as Autism, the district/county's data did not differentiate between cross-categorical and autism-focused SDCs, which have different caseload ranges.

The district/county needs to begin distinguishing its SDCs for students with autism from other SDCs in its data because both the district/county's staffing guide and industry standards use different caseload sizes for these classes. After the district/county does this, it will need to review caseloads and assess students' needs to determine if it should adjust teacher staffing for any of these classes.

## Access Special Day Class Program

In 2024-25, the district/county has 18.00 FTE SDC teachers of classes for adult students ages 18 to 22 who have extensive support needs. Based on caseload estimates provided by the district/county, these teachers manage the cases of 178 students, averaging 9.89 students per teacher, as shown in Table 15 below.

**Table 15: District/County Access SDC Program Teacher Staffing, 2024-25**

School Level	Total Teacher FTE	Total Student Caseload	Average Caseload Per Teacher	Industry-Standard Caseload Range	Staffing FTE Above (+) or Below (-) Industry Standard
Adult	18.00	178	9.89	10-12 students per teacher	Within Industry Standard Range

Sources: District/county-provided data and industry standards.

After rounding, the districtwide/countywide Access Program caseload average of 9.89 students per teacher is within the industry standard range of 10-12 students per teacher. The district/county needs to continue to review caseload projections and assess students' needs annually to determine if it should adjust teacher staffing in this program.

## Recommendations

*The district/county should:*

1. Evaluate whether aligning its SDC caseload guidelines with industry standards would allow it to reduce the number of teachers needed for these programs while continuing to meet students' needs.
2. Reduce the number of RSP teachers in accordance with the district/county staffing guide.
3. Use factors such as caseload numbers, student needs, and schoolwide needs to determine which schools can share an RSP teacher.
4. Begin tracking SDC teacher caseload data by specialized pathway (i.e., SOAR, Autism, Access). Analyze teacher-to-student ratios by SDC pathway using the district/county staffing guidelines and industry standards, and take into consideration student need, to determine if consolidating classes to reduce SDC teacher staffing is warranted.

# Special Education Paraeducator Staffing

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

The district/county's special education supervisors coordinate with the Special Education Department's allocation team to assign paraeducators to schools using a set formula, which can be modified based on factors such as class size and students' needs. Schools are responsible for hiring and supervising special education paraeducators.

## Industry-Standard Paraeducator Staffing Ratios

The industry-standard base staffing for SDCs is to assign one paraeducator for every teacher of students with mild-to-moderate and extensive support needs. For SDCs serving students with autism, the standard is two special education paraeducators for every teacher. In addition, the industry standard for staffing in excess of the SDC base staffing level is determined by an adult-to-student ratio, as shown in Table 16 below.

**Table 16: Industry-Standard Paraeducator Staffing and Adult-to-Student Ratios**

SDC Support Level	SDC Focus	Industry-Standard Special Education Paraeducator Staffing	Adult-to-Student Ratio
Mild-to-Moderate	Noncategorical	One to two six-hour special education paraeducators for a class size of 12-15	1-to-7
Extensive	Noncategorical	One to two six-hour special education paraeducators for a class size of 10-12	1-to-5
All	Autism	Two to four six-hour special education paraeducators for a class size of 8-10	1-to-3

Source: Industry standards.

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

## District/County Paraeducator Staffing Guidelines for SDCs

The district/county assigns paraeducators to its SDCs according to the guidelines shown in Table 17 below.

**Table 17: District/County's Special Education Paraeducator Staffing Guidelines for SDCs**

Program	Class Size	Number of Teachers	Number of Paraeducators
Mild-to-Moderate Special Day Class – Cross-Categorical	8-12	1	1
Mild-to-Moderate Special Day Class – Autism Focus	8-12	1	2

Program	Class Size	Number of Teachers	Number of Paraeducators
Extensive Special Day Class – Cross-Categorical	6-10	1	2
Extensive Special Day Class – Autism Focus	6-10	1	2
SOAR Special Day Class – Mental Health and Behavioral	8-10	1	2
Access (Community, Access and Transition 18–22-year-olds)	6-10	1	3

Source: District/County *Special Education School Site Staffing Guide School Year 2024-2025*.

Establishing paraeducator staffing guidelines for SDC programs is a good practice, but the district/county's class size ranges do not match the industry standards, and because the district/county does not use an adult-to-student staffing ratio to determine paraeducator staffing, it may be over- or understaffed. Assigning more paraeducator support than necessary is costly and may limit students' opportunities to gain independence; however, not assigning enough paraeducators to an SDC can mean that students lack appropriate support and supervision. Therefore, the district/county would benefit from adding an adult-to-student ratio to its paraeducator staffing guidelines for SDCs. When using such a ratio to determine staffing, it is the best practice to include the teacher and classroom paraeducators in the adult portion of the ratio, and to remove any students who have a 1-to-1 paraeducator and their assigned 1-to-1 paraeducator from the ratio.

## District/County Paraeducator Staffing

In 2024-25, the district/county has 1,304 special education paraeducators providing a total of 927.56 FTE, as shown in Table 18 below.

**Table 18: District/County's Special Education Paraeducators by Type, 2024-25**

Type of Paraeducator	Number of Paraeducators	Number of FTE Paraeducators
Classroom	671	480.81
1-to-1 Support	589	416.44
Bus	44	30.31
<b>Total</b>	<b>1,304</b>	<b>927.56</b>

Source: District/County-provided data.

Of its 671 (480.81 FTE) special education classroom paraeducators, the district/county reported that 371 of these employees work in SDCs and the other 300 serve in the RSP. FCMAT compared the district/county's SDC paraeducator staffing to industry-standard paraeducator staffing for SDCs, which is based on an adult-to-student ratio, and found that the district/county has 26 SDCs staffed with one paraeducator more than the industry-standard adult-to-student ratio and 17 SDCs that may be staffed with one paraeducator less than the industry-standard ratio.

It was not possible for FCMAT to definitively determine whether the SDCs that may be staffed with one paraeducator less than the industry-standard adult-to-student ratio actually are. This is because, as mentioned earlier, it is the best practice to include the teacher and classroom paraeducators in the adult portion of the ratio, and to remove from the ration any students who have a 1-to-1 paraeducator and their assigned 1-to-1 paraeducator. However, the district/county reported that it does not track which paraeducators are

assigned to which SDC at a school, so, FCMAT was unable to remove any students who have a 1-to-1 paraeducator and their assigned 1-to-1 paraeducators when calculating ratios. This means that the 26 SDCs reported as exceeding the industry standard adult-to-student ratio may not be exceeding it, and that other SDCs could potentially have fewer adults than the district/county's data shows, because 1-to-1 paraeducators and their assigned students are not being removed from the count.

District/county SDCs that do not have the industry-standard adult-to-student ratio are shown in Table 19 below. Data for all district/county SDCs is presented in [Appendix B](#). Because the district/county does not track paraeducator assignments by SDC at a school, FCMAT was unable to remove any students who have a 1-to-1 paraeducator and their assigned 1-to-1 paraeducators when calculating ratios. This means that the SDCs reported as aligned with the industry-standard ratio may be so reported only because the data includes one or more 1-to-1 paraeducators.

The district/county needs to begin tracking 1-to-1 special education paraeducator assignments by SDC so it can determine actual SDC staffing numbers and ratios.

**Table 19: District/County's Special Education Paraeducator SDC Staff Compared to Industry Standards**

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator-to-Student Ratio	Industry-Standard Teacher and Classroom Support Paraeducator-to-Student Ratio	Staffing Above (+) or Below (-) Industry Standard
Alvarado ES	Extensive Needs	10	2	3-to-10 or 0.30	1-to-5 or 0.20	+1
AP Giannini MS	Mild-to-Moderate Needs Autism Focus	12	2	3-to-12 or 0.25	1-to-3 or 0.33	-1
AP Giannini MS	Extensive Needs	9	2	3-to-9 or 0.33	1-to-5 or 0.20	+1
Argonne ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	-1
Argonne ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	-1
Balboa HS	Extensive Needs	10	2	3-to-10 or 0.30	1-to-5 or 0.20	+1
Balboa HS	Extensive Needs	9	2	3-to-9 or 0.33	1-to-5 or 0.20	+1
Burton HS	Extensive Needs	8	2	3-to-8 or 0.38	1-to-5 or 0.20	+1
Burton HS	Extensive Needs	9	2	3-to-9 or 0.33	1-to-5 or 0.20	+1
EI Dorado ES	Mild-to-Moderate Needs Autism Focus	12	2	3-to-12 or 0.25	1-to-3 or 0.33	-1
Galileo HS	Mild-to-Moderate Needs Autism Focus	6	2	3-to-6 or 0.50	1-to-3 or 0.33	+1

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator-to-Student Ratio	Industry-Standard Teacher and Classroom Support Paraeducator-to-Student Ratio	Staffing Above (+) or Below (-) Industry Standard
Garfield ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	-1
Huerta (Dolores) ES	Extensive Needs	10	2	3-to-10 or 0.30	1-to-5 or 0.20	+1
Huerta (Dolores) ES	Extensive Needs	6	2	3-to-6 or 0.50	1-to-5 or 0.20	+1
Jefferson ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	-1
Key (Francis Scott) ES	Extensive Needs	7	2	3-to-7 or 0.43	1-to-5 or 0.20	+1
Key (Francis Scott) ES	Extensive Needs	6	2	3-to-6 or 0.50	1-to-5 or 0.20	+1
King (Thomas Starr) ES	Extensive Needs Autism Focus	6	2	3-to-6 or 0.50	1-to-3 or 0.33	+1
Lakeshore ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	-1
Lakeshore ES	Mild-to-Moderate Needs Autism Focus	12	2	3-to-12 or 0.25	1-to-3 or 0.33	-1
Lawton K-8	Extensive Needs	10	2	3-to-10 or 0.30	1-to-5 or 0.20	+1
Lawton K-8	Extensive Needs	10	2	3-to-10 or 0.30	1-to-5 or 0.20	+1
Lawton K-8	Extensive Needs	10	2	3-to-10 or 0.30	1-to-5 or 0.20	+1
Lincoln HS	Mild-to-Moderate Needs Autism Focus	12	2	3-to-12 or 0.25	1-to-3 or 0.33	-1
Lincoln HS	Extensive Needs Autism Focus	6	2	3-to-6 or 0.50	1-to-3 or 0.33	+1
Lincoln HS	Extensive Needs Autism Focus	6	2	3-to-6 or 0.50	1-to-3 or 0.33	+1
Lowell HS	Extensive Needs	9	2	3-to-9 or 0.33	1-to-5 or 0.20	+1
Lowell HS	Extensive Needs	10	2	3-to-10 or 0.30	1-to-5 or 0.20	+1
McKinley ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	-1

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator-to-Student Ratio	Industry-Standard Teacher and Classroom Support Paraeducator-to-Student Ratio	Staffing Above (+) or Below (-) Industry Standard
Miraloma ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	-1
Miraloma ES	Mild-to-Moderate Needs Autism Focus	12	2	3-to-12 or 0.25	1-to-3 or 0.33	-1
Mission HS	Extensive Needs	9	2	3-to-9 or 0.33	1-to-5 or 0.20	+1
Mission HS	Extensive Needs	9	2	3-to-9 or 0.33	1-to-5 or 0.20	+1
Presidio MS	Extensive Needs	7	2	3-to-7 or 0.43	1-to-5 or 0.20	+1
Roosevelt MS	Mild-to-Moderate Needs Autism Focus	12	2	3-to-12 or 0.25	1-to-3 or 0.33	-1
Sherman ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	-1
Sherman ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	-1
Sunnyside ES	Extensive Needs	7	2	3-to-7 or 0.43	1-to-5 or 0.20	+1
Sunnyside ES	Extensive Needs	5	2	3-to-5 or 0.60	1-to-5 or 0.20	+1
Taylor (Edward R) ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	-1
Tenderloin Community ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	-1
Washington HS	Extensive Needs	8	2	3-to-8 or 0.38	1-to-5 or 0.20	+1
Washington HS	Extensive Needs	8	2	3-to-8 or 0.38	1-to-5 or 0.20	+1

Source: District/county-provided data.

Notes: This table shows data for 228 of the district/county classroom special education paraeducators working in an SDC; it includes only SDCs that are above or below the industry standard. It also excludes data for district/county classroom special education paraeducators working in preschool, deaf/hard of hearing, SOAR, and Access SDCs because FCMAT does not have an industry standard for those programs.

## 1-to-1 Student Support

There is no established industry standard for special education paraeducators providing IIS, also known as 1-to-1 paraeducator support. Many LEAs throughout the state have taken steps to remove the designation of 1-to-1 support because it unintentionally reinforces the concept of one adult assigned to one student.

Industry practice commonly refers to both the assessment process and the special education paraeducator role as special circumstance instructional assistance (SCIA).

The district/county consistently uses an IIS assessment process to determine whether a student requires 1-to-1 paraeducator support. This process clarifies decision-making procedures and recognizes that IIS is a significant program decision that should be based on a thorough, data-driven evaluation that includes considering all less restrictive alternatives. The district/county's IIS assessment aligns with industry standards because it focuses on personal independence, promotes individual decision-making, works to maximize existing supports, and is based on data-driven assessment.

In 2024-25, the district/county has 416.44 FTE one-to-one paraeducators assigned to provide IIS. Although there is no industry standard for comparison, this is high for a district/county of this size compared to what is observed across the state.

## **Causes of the High Number of 1-to-1 Paraeducators**

Staff explained that many district/county students receive IIS because of increased student support needs following the COVID-19 pandemic, and because of teacher turnover that results in inexperienced teachers who need additional help in certain SDCs. Although the district consistently administers its IIS assessment before assigning IIS, staff reported some IEP teams recommend IIS for a student even though the IIS assessment does not demonstrate that need. Some staff expressed that the district/county's paraeducator allocations to SDCs are rigid and not responsive enough to students' needs; therefore, some IEP teams will add IIS to a student's IEP to ensure that the class is assigned a 1-to-1 paraeducator for that student, regardless of whether the student meets the IIS assessment criteria. Staff also stated that if a student who has a 1-to-1 paraeducator changes schools, the 1-to-1 paraeducator may remain at the student's former school, and the student's new school may be assigned an additional 1-to-1 paraeducator for the student.

## **Consequences of High 1-to-1 Paraeducator Staffing**

As previously mentioned, assigning more paraeducator support than necessary is costly. In addition, although a parent/guardian or staff member's request for a student to have a 1-to-1 paraeducator may be well meaning, according to the [University of Colorado at Denver's Paraprofessional Resources and Research Center](#), it can negatively affect the student's education in the following ways:

- The paraeducator may become the student's primary service provider, and the teacher's involvement and interactions with the student may be limited. The University of Colorado at Denver's Paraprofessional Resources and Research Center cautions, "This practice is further exacerbated when paraeducators are not qualified and or trained. It is not in the best interest of the students with most complex needs to be taught by the least qualified staff member."
- The paraeducator's constant presence may cause the student to become overly dependent on that adult to do things they could otherwise do independently.
- The paraeducator may create social barriers between the student they are supporting and the student's peers.

## Best Practices in 1-to-1 Paraeducator Assignment

In addition to using an assessment to determine whether a student requires a 1-to-1 paraeducator, LEAs should also identify when during the school day a student requires a 1-to-1 paraeducator and assign this only for those times. Form H of the district/county's IIS assessment, titled, "Referral for Intensive Individual Services School Day Analysis," could be used to determine which parts of the school day a student requires support (e.g., for mathematics or during recess). This is an alternative to assigning a student a 1-to-1 paraeducator for the entire school day, which is only necessary for some students. If staff use a modified version of Form H for this purpose, a 1-to-1 paraeducator could be shared by more than one student at a school. This could reduce the number of 1-to-1 paraeducators needed and the associated costs, as well as reduce a student's dependence on 1-to-1 paraeducator support and help a student transition to independence over time. Staff recognized that Form H could be used for this purpose, but the district/county reported that it does not consistently use Form H to determine whether 1-to-1 paraeducators could support more than one student at a school.

Part of the IIS assessment process focuses on planning for a student's transition to independence and developing annual IEP goals to support this. Staff reported that they do not consistently write goals for independence or plans to reduce a student's reliance on 1-to-1 special education paraeducator support when adding IIS support to a student's IEP. Doing so would be a good practice because it focuses IEP services on addressing deficit areas to strengthen skills, allows the student's IEP team to monitor annual progress, and helps them determine whether adjustments to the level of service are needed. It would also help the IEP team move away from the concept of assigning one adult to one student, which would enable the district/county to assign one special education paraeducator to more than one students when appropriate. Staff identified resistance from parents as the main barrier to reducing or removing IIS, regardless of whether this support is necessary or beneficial to the student.

## Recommendations

*The district/county should:*

1. Begin using adult-to-student ratios to help determine the assignment of special education paraeducators to SDCs.
2. Begin tracking which paraeducators are assigned to which SDCs at a school.
3. Regularly monitor and evaluate whether schools are consistently assigning 1-to-1 special education paraeducator support based on IIS assessment results.
4. Consistently use Form H of its IIS assessment to determine when during the school day a student requires 1-to-1 special education paraeducator support, and assign 1-to-1 paraeducator support accordingly.
5. Use IIS assessment results to determine whether one paraeducator can provide 1-to-1 support to more than one student at a school.
6. Ensure that each IEP that calls for IIS, except for medically necessary support, includes goals for independence and a support phase-out plan that is actively monitored.

# Related Service Provider Staffing and Caseloads

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

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

**Table 20: Industry-Standard Provider-to-Student Ratios**

Provider Type	Industry-Standard or Education Code Provider-to-Student Ratio
Psychologist	1-to-977
SLP (preschool)	1-to-40
SLP (ages 5-22)	1-to-55
APE Teacher	1-to-45-55
Physical Therapist	1-to-45-55
Occupational Therapist	1-to-45-55
Vision and Orientation and Mobility	1-to-10-30
Deaf and Hard of Hearing	1-to-15-25
Nurse	1-to-2,274

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

## Adapted Physical Education

Article 9.5.7.1 of the district/county's contract with UESF states that the caseload size for APE teachers is 45-55 students, which matches the industry standard.

In 2024-25, the district/county has 5.0 FTE APE teacher positions with a combined total caseload of 50 students receiving direct services, as shown in Table 21 below. This is 4.0 FTE APE teacher positions above the average industry standard provider-to-student ratio. All APE teachers are district/county employees.

**Table 21: District/County Adapted Physical Education Teacher Staffing, 2024-25**

Provider	Number of FTE	2024-25 Total Caseload	Caseload Average	District/County and Industry-Standard Provider-to-Student Ratio	FTE Needed to Meet Industry Standard	Staffing Above (+) or Below (-) Industry Standard
APE Teacher	5.0	50.0	10.0	1-to-45-55	1.11 FTE (to meet 1-to-45) 0.90 FTE (to meet 1-to-55)	+3.89 FTE (above 1-to-45) +4.09 FTE (above 1-to-55)

Sources: District/county-provided data and industry standards.

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

As shown in the table, the district has approximately five times the industry-standard staffing levels for APE teachers. Staff reported that each district/county APE teacher serves students at several schools, and that significant travel time between schools increases the number of APE teachers needed. The district/county needs to review APE teacher caseload projections, assessment loads, the number of schools each APE teacher supports, driving times between schools, direct and consultation service minutes, and students' needs to determine if it can reduce the number of APE teachers and continue to meet students' needs.

## Credentialed School Nurses

In 2024-25, the district/county has 68.30 FTE credentialed school nurse positions. At the time of FCMAT's fieldwork, 49.80 FTE of these positions were filled, and each filled position serves an average caseload of 1,122.89 students, as shown in Table 22 below. This is 25.21 FTE credentialed school nurse positions more than the average industry-standard provider-to-student ratio.

**Table 22: District/County Credentialed School Nurse Staffing, 2024-25**

Provider	Number of FTE of Filled Positions	2023 Census Day Enrollment	Caseload Average	Industry-Standard Provider-to-Student Ratio	FTE Needed to Meet Industry Standard	Staffing Above (+) or Below (-) Industry Standard
School Nurse	49.80	55,920	1,122.89	1-to-2,274	24.59 FTE	+25.21 FTE

Sources: Pupil Services Staff by Type (CDE), district/county-provided data, and [Enrollment for Charter and Non-Charter Schools - San Francisco Unified and San Francisco County Office of Education \(CDE\)](#).

As shown in the table, the district/county has double the industry-standard staffing levels for credentialed school nurses. In addition to having 25.21 FTE more nurses working than the industry standard, the district/county has another 18.50 FTE credentialed school nurse positions that were not filled at the time of fieldwork, which means it has 43.71 FTE more credentialed school nurse positions than the industry standard. The district/county needs to review its enrollment, special education enrollment, duties performed by credentialed school nurses, schoolwide needs, and students' needs to determine how much it can reduce credentialed school nurse staffing.

Most LEAs use a combination of credentialed school nurses and licensed vocational nurses (LVNs) to meet students' needs; however, the district/county reported having only 0.85 FTE LVNs. When analyzing credentialed school nurse duties and evaluating staffing reductions, the district/county needs to evaluate whether certain duties being performed by a credentialed school nurse could instead be performed by an LVN.

## Occupational Therapy

In 2024-25, the district/county has 39.7 FTE occupational therapist positions, each with an average caseload of 27.63 students receiving direct services, as shown in Table 23 below. This is 17.76 FTE occupational therapist positions more than the average industry-standard provider-to-student ratio. In addition, the district/county has 6.0 FTE certified occupational therapy assistants (COTAs) and a 1.0 FTE licensed occupational therapy assistant, who were not included in this analysis because they act in a support role and cannot perform all the duties of an occupational therapist.

**Table 23: District/County Occupational Therapist Staffing, 2024-25**

Provider	Number of FTE	2024-25 Total Caseload	Caseload Average	Industry Standard Provider-to-Student Ratio	Staffing Above (+) or Below (-) Industry Standard
Occupational Therapist	39.7	1,097	27.63	1-to-45-55	+15.32 FTE (above 1-to-45) +19.75 FTE (above 1-to-55)

Sources: District/county-provided data and industry standards.

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

The district/county's 6.0 FTE COTAs and 1.0 FTE licensed occupational therapy assistant were not included in this analysis.

As shown in the table, the district/county more than double the industry-standard staffing levels for occupational therapists. Staff reported that travel time between district/county schools influences the number of occupational therapists needed. However, the district/county does not recognize that it is staffed significantly higher than the industry standard. The district/county needs to review occupational therapist caseload projections, assessment loads, the number of schools each occupational therapist serves, driving time between schools, direct and consultation service minutes, and students' needs to determine if it can reduce the number of occupational therapists and continue to meet students' needs.

In addition to being staffed significantly above the industry standard for occupational therapists, only 2.0 FTE of district/county occupational therapist positions are filled with district/county employees in 2024-25; the other 37.9 FTE are filled through contracts with nonpublic agencies (NPAs). Because NPA staff are typically more expensive than district/county staff, the district/county could probably reduce occupational therapist costs if it hired its own employees.

FCMAT estimated the annual cost for an occupational therapist contracted through an NPA, as shown in Table 24 below. FCMAT projected costs based on three different numbers of days worked per year:

- 184 days – This is a typical school year of 180 days with four days added for professional development and/or preparation.
- 204 days – This is a typical school year of 180 days with four days added for professional development and/or preparation and 20 days added for extended school year.
- 251 days – This is the number of days district/county-employed occupational therapists were reported to work currently, which is not aligned with what is observed across the state.

**Table 24: Estimated NPA Cost for an Occupational Therapist, 2024-25**

	Hourly Rate	Hours Per Day	Daily Rate	Total Cost
184 Workdays	\$110.00	7	\$770.00	\$141,680
204 Workdays	\$110.00	7	\$770.00	\$157,080
251 Workdays	\$110.00	7	\$770.00	\$193,270

Sources: District/county-provided data.

Note: FCMAT reviewed district/county master contracts with NPAs and determined that NPA hourly rates for occupational therapists varied from \$80 to \$150 per hour; however, the most common rate stated was a from \$105 to \$115 per hour. Therefore, FCMAT used an average rate of \$110.00 per hour for its estimate.

For comparison, the total cost for an occupational therapist who is a district/county employee is shown in Table 25 below. The district/county reported that a district/county employee occupational therapist works 251 days per year. This is far more than is commonly observed across the state. Typically, occupational therapists work approximately 184 days, or approximately 204 days if they serve students in an extended school year program. Total costs for 184, 204 and 251 workdays are included in Table 25.

**Table 25: District/County Cost for a District/County Employee Occupational Therapist, 2024-25**

	Daily Rate	Salary	Benefits Rate	Benefits Cost	Health Benefits Cost	Total Cost
184 Workdays	\$503.62	\$92,666.08	35.62%	\$33,007.66	\$12,800	\$138,473.74
204 Workdays	\$503.62	\$102,738.48	35.62%	\$36,595.45	\$12,800	\$152,133.93
251 Workdays	\$503.62	\$126,408.62	35.62%	\$45,026.75	\$12,800	\$184,235.37

Source: District/county-provided data.

FCMAT's calculated cost for a district/county-employed occupational therapist is lower than its estimated cost of an occupational therapist contracted through an NPA. The cost saving was estimated to be from approximately \$3,206 to \$9,035 annually per occupational therapist, depending on the number of workdays, which means the possible cost savings compared to the 37.9 FTE occupational therapists employed through an NPA would be significant.

The district/county reported that it has not attempted to recruit and hire its own occupational therapists in many years because managers are concerned that they would not be able to hire the staff they want because the City and County of San Francisco also employ occupational therapists who are in the same union and come with the same contract as those the district employs. The district/county would thus have to take these factors into consideration when hiring. However, by not seeking a pool of potential employees or attempting to hire its own employees, the district/county is increasing its costs for occupational therapists. In addition to being more cost effective, hiring its own employees would give the district/county more control over the management of its occupational therapists.

The district/county also needs to review the number of workdays for occupational therapists to determine if it can create a district/county occupational therapist position that is aligned with the industry-standard 184 or 204 workdays rather than the current 251 workdays, which would significantly reduce costs.

## Physical Therapy

In 2024-25, the district/county has 12.3 FTE physical therapist positions, each with an average caseload of 20.41 students receiving direct services, as shown in Table 26 below. This is 7.28 FTE physical therapist positions more than the average industry-standard provider-to-student ratio.

**Table 26: District/County's Physical Therapist Staffing, 2024-25**

Provider	Number of FTE	2024-25 Total Caseload	Caseload Average	Industry-Standard Provider-to-Student Ratio	Staffing Above (+) or Below (-) Industry Standard
Physical Therapist	12.3	251.0	20.41	1-to-45-55	+6.72 FTE (above 1-to-45) +7.74 FTE (above 1-to-55)

Sources: District/county-provided data and industry standards.

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

As shown in the table, the district/county has almost double the industry-standard staffing levels for physical therapists. Staff reported that travel time between district/county schools increases the number of physical therapists needed. However, the district/county does not recognize that its physical therapist staffing is far higher than the industry standard. The district/county needs to review physical therapist caseload projections, assessment loads, the number of schools each physical therapist supports, driving time between schools, direct and consultation service minutes, and students' needs to determine if it can reduce the number of physical therapists and continue to meet students' needs.

In addition to being staffed significantly above the industry standard for physical therapists, in 2024-25 only 1.0 FTE of the physical therapist positions is filled with a district/county employee; the other 11.3 FTE were filled through contracts with NPAs.

FCMAT estimated an annual cost for physical therapists contracted through an NPA, as shown in Table 27 below. As with occupational therapists, FCMAT determined costs for 184, 204, and 251 days worked per year.

**Table 27: Estimated NPA Cost for a Physical Therapist, 2024-25**

	Hourly Rate	Hours Per Day	Daily Rate	Total Cost
184 Workdays	\$106.00	7	\$742.00	\$136,528
204 Workdays	\$106.00	7	\$742.00	\$151,368
251 Workdays	\$106.00	7	\$742.00	\$186,242

Sources: District/county-provided data.

Note: FCMAT reviewed district/county master contracts with NPAs and determined that NPA hourly rates for physical therapists varied from \$93 to \$150 per hour; however, the most common rate stated was from \$100 to \$112 per hour. Therefore, FCMAT used an average rate of \$106.00 per hour for its estimate.

For comparison, the total cost for a physical therapist who is a district/county employee is shown in Table 28 below. The district/county reported that a physical therapist who is a district/county employee works 251 days per year. This is far more than what is observed across the state. Typically, physical therapists work approximately 184 days, or approximately 204 days if they serve students in an extended school year program. Table 28 includes total costs for 184, 204 and 251 workdays per year.

**Table 28: District/County Cost for a Physical Therapist, 2024-25**

	Daily Rate	Salary	Benefits Rate	Benefits Cost	Health Benefits Cost	Total Cost
184 Workdays	\$493.23	\$90,754.32	35.62%	\$32,326.69	\$12,800	\$135,881.01
204 Workdays	\$493.23	\$100,618.92	35.62%	\$35,840.46	\$12,800	\$149,259.38
251 Workdays	\$493.23	\$123,800.73	35.62%	\$44,097.82	\$12,800	\$180,698.55

Sources: District/county-provided data.

FCMAT's calculated cost for a district/county-employed physical therapist is lower than its estimated cost of a physical therapist contracted through an NPA. The annual cost savings was estimated to be from approx-

imately \$647 to \$5,543 per physical therapist, depending on the number of workdays. The possible cost savings of using district/county-employed staff for the 11.3 FTE physical therapists currently filled through an NPA is significant.

As with occupational therapists, the district/county reported it has not attempted to recruit and hire its own physical therapists in many years because managers are concerned that they would not be able to hire the staff they want, because the City and County of San Francisco also employ physical therapists who are in the same union and come with the same contract as those the district employs. The district/county would thus have to take these factors into consideration when hiring.

However, by not seeking a pool of potential employees or attempting to hire its own employees, the district/county is increasing its costs. In addition to being more cost effective, hiring its own employees would give the district/county more control over the management of its physical therapists.

The district/county also needs to review the number of workdays for physical therapists to determine if it can create a district/county physical therapist position that is aligned with an industry-standard 184 or 204 workdays rather than the current 251 workdays, which would significantly reduce costs.

## School Psychologists for School-Age Programs

In 2024-25, the district/county has 106.6 FTE school psychologist positions; 76.6 FTE are filled with district/county employees, and 30.0 FTE are filled through contracts with NPAs. Unlike its practice with occupational therapist and physical therapist positions, staff reported that the district/county annually opens applicant pools and hires as many district/county-employed school psychologists as possible.

The district/county has 96.8 FTE school psychologists serving school-age programs, each with an average caseload of 577.69 students, as shown in Table 29 below. The district/county's other 9.8 FTE school psychologists serve the preschool program and were not included in this staffing comparison.

**Table 29: District/County School Psychologist Staffing for School-Age Programs Compared to Industry Standard, 2024-25**

Provider	Number of FTE	2023 Census Day Enrollment	Caseload Average	Industry-Standard Provider-to-Student Ratio	FTE Needed to Meet Industry Standard	Staffing Above (+) or Below (-) Industry Standard
School Psychologist for School-Age Programs	96.80	55,920	577.69	1-to-977	57.24 FTE	+39.56 FTE

Sources: District/county-provided data, [Pupil Services Staff by Type](#) (CDE), and [Enrollment for Charter and Non-Charter Schools - San Francisco Unified and San Francisco County Office of Education](#) (CDE).

Note: The district/county's 9.8 FTE school psychologists who serve the preschool program were not included in this staffing comparison.

As shown in the table, the district/county has almost double the industry-standard staffing levels for school psychologists for school-age programs. Staff reported that school psychologists who serve the school-age program work in the comprehensive role of a school psychologist, which means they provide social-emotional and behavioral support, consult with teachers, provide one-to-one counseling, and complete assessments. Staff reported that most of these psychologists' time is spent on initial and triennial psychoeducational assessments.

The district/county has expanded its behavioral support team in recent years, and it now includes 22.0 FTE behavior intervention specialists. In addition, the district/county has hired staff who provide educationally-related mental health services (ERMHS), including 4.0 FTE registered associate clinical social workers, 4.8 FTE licensed marriage and family therapists, 15.0 FTE associate marriage and family therapists, 2.0 FTE associate professional clinical counselors, and a 1.0 FTE credentialed school counselor. It also contracts with the City and County of San Francisco, which provides additional ERMHS. FCMAT does not have an industry standard for behavioral intervention specialists or staff who provide ERMHS, but the services provided by these staff typically reduce the need for school psychologists. Staff reported that the high number of initial assessments following the COVID-19 pandemic increased the district/county's need for school psychologists.

Article 9.5.10 of the district/county's contract with UESF states: "Psychologists shall serve a total school population at a ratio of 1:800 students within SFUSD in TK through age 22. This ratio does not include students in private school, preschool, and ERMHS (Educationally Related Mental Health Services)." This ratio has a lower number of students per provider than the industry-standard 977 students, yet the district averages even fewer students per provider than the ratio in its contract. If the district adhered to the contract ratio, it would have 26.90 FTE fewer school psychologists, as shown in Table 30 below.

**Table 30: District/County School Psychologist Staffing Compared to Contract Standard, 2024-25**

Provider	Number of FTE	2023 Census Day Enrollment	Caseload Average	Contract Provider-to-Student Ratio	FTE Needed to Meet Contract Provider-to-Student Ratio	Staffing Above (+) or Below (-) Contract Staffing Guideline
School Psychologist for School-age Programs	96.80	55,920	577.69	1-to-800	69.90 FTE	+26.90 FTE

Sources: District/county-provided data, Pupil Services Staff by Type (CDE), and Enrollment for Charter and Non-Charter Schools - San Francisco Unified and San Francisco County Office of Education (CDE).

Note: The district/county's 9.8 FTE school psychologists who serve the preschool program were not included in this staffing comparison.

Because it is significantly overstaffed with school psychologists compared to both industry standards and its own contract, it would benefit the district/county to review the following items to help determine how many FTE school psychologist positions it needs and what staffing reductions can be made:

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

## Speech and Language Pathologists

In 2024-25, the district/county has 133.0 FTE speech and language pathologists (SLPs); 90.0 FTE are employed by the district/county, 43.0 FTE are contracted through an NPA. Unlike its practice for occupational therapist and physical therapist positions, staff reported that the district/county annually opens applicant pools and hires as many district/county-employed SLPs as possible.

Because the district/county did not provide information about the age or grade levels of the 1,123 students served by the 43.0 FTE SLPs employed by an NPA, the analysis below is limited to the 90.0 FTE district/county-employed SLPs and the 3,002 students for whom they provide direct services.

## District/County-Employed Speech and Language Pathologists Serving the Preschool Program

Education Code 56441.7(a) and Article 9.5.7.5 of the district/county's contract with UESF establish a maximum caseload of 40 students for SLPs serving preschool students.

In 2024-25, the district/county has 15.8 FTE district/county-employed SLPs who work exclusively with preschool age students; 4.0 FTE of these SLPs only administer assessments and do not have a caseload, so were excluded from this analysis. The remaining 11.8 FTE district/county-employed SLPs working exclusively with preschool age students each have an average caseload of 18.98 students receiving a direct service, as shown in Table 31 below.

**Table 31: District/County Employed Preschool Speech and Language Pathologist Staffing, 2024-25**

Provider	Number of FTE	2024-25 Total Caseload	Caseload Average	Contract and Education Code Standard Provider-to-Student Ratio	FTE Needed to Meet Contract and Education Code Provider-to-Student Ratio	Staffing Above (+) or Below (-) Contract and Education Code Standard Provider-to-Student Ratio
District/County Employed SLPs for Preschool	11.8	224	18.98	1-to-40	5.6 FTE	+6.20 FTE

Sources: District/county-provided data and EC 56441.7(a).

Note: Only preschool-age students receiving direct services from a district/county employed SLP were included in the caseload average for comparison with the EC 56441.7(a) maximum.

The district/county's 4.0 FTE district/county-employed SLPs who administer preschool assessments and do not have a caseload were not included in this staffing comparison.

As shown in the table, the district/county has more than double the industry-standard staffing levels for district/county employed SLPs for preschool.

## District/County-Employed Speech and Language Pathologists Serving School-Age Students

Education Code 56363.3 and Article 9.5.7.4 of the district/county's contract with UESF establish a maximum caseload of 55 students and 45 students, respectively, for SLPs serving students ages 5-22.

In 2024-25, the district/county has 56.4 FTE district/county-employed SLPs working exclusively with school-age students; 1.0 FTE of these SLPs supported only students in private/parochial schools, so was

excluded from this analysis. The remaining 55.4 FTE district/county-employed SLPs each managed an average caseload of 38.00 students receiving a direct service, as shown in Table 32 below.

**Table 32: District/County-Employed School Age Speech and Language Pathologist Staffing, 2024-25**

Provider	Number of FTE	2024-25 Total Caseload	Caseload Average	Education Code Standard Provider-to-Student Ratio	FTE Needed to Meet Education Code Provider-to-Student Ratio	Staffing Above (+) or Below (-) Education Code Maximum
District/County-Employed SLPs — School-Age	55.4	2,105	38.00	1-to-55	38.27	+17.13 FTE

Sources: District/county-provided data and EC 56363.3.

Notes: Only students receiving direct services from a district/county-employed SLP who serves only school-age students were included in the caseload average for comparison with the EC 56363.3 maximum.

The district/county's 1.0 FTE district/county-employed SLP who serves only students in private/parochial schools was not included in this staffing comparison.

As shown in the table, the district/county has approximately one and a half times the industry-standard staffing levels for district/county employed SLPs for school-age programs.

## **District/County-Employed Speech and Language Pathologists Serving Preschool and School-Age Students**

In 2024-25, the district/county has 17.8 FTE district/county-employed SLPs who serve both preschool and school-age students, each with an average caseload of 37.81 students who received a direct service, as shown in Table 33 below.

**Table 33: District/County-Employed Preschool and School-Age Averaged Speech and Language Pathologist Staffing, 2024-25**

Provider	Number of FTE	2024-25 Total Caseload	Caseload Average	EC 56363.3 and 56441.7(a) Blended* Minimum Provider-to-Student Ratio	FTE Needed to Meet EC 56363.3 and 56441.7(a) Combined Average Caseload Maximum	Staffing Above (+) or Below (-) EC 56363.3 and 56441.7(a) Blended Maximum
District/County-Employed SLPs — Preschool and School Age	17.8	673	37.81	1-to-47.5	14.17	+3.63 FTE

Sources: District/county-provided data, EC 56441.7(a) and EC 56363.3.

Note: Only students who receive direct services from a district/county-employed SLP who serves both preschool and school-age students were included in the caseload average for comparison with the average of the caseload maximums specified in EC 56441.7(a) and EC 56363.3.

\*The blended minimum staffing ratio was calculated by averaging the statutory preschool and school-age caseload maximums.

## Summary of District/County-Employed Speech and Language Pathologist Staffing

In 2024-25, the district/county's staffing for district/county-employed SLPs is as follows:

- **Preschool** – 6.20 FTE more than what is needed to meet the EC 56441.7(a) caseload maximum.
- **School-Age** – 17.13 FTE more than what was needed to meet the EC 56363.3 caseload maximum.
- **Preschool and School Age** – 3.63 FTE more than what was needed to meet the EC 56441.7(a) and EC 56363.3 averaged maximum.

Collectively, district/county staffing for employed SLPs is 26.96 FTE more than what is needed to meet EC caseload maximums. Staff indicated that increased student needs following the COVID-19 pandemic and a higher than usual number of speech and language initial assessments necessitated an increase in the district/county's SLP staffing. As with other related service providers, the district/county does not recognize that it is staffed significantly higher than needed to meet the Education Code standard. The district/county needs to review SLP caseload projections and students' needs to determine if it can reduce SLP staffing while continuing to meet students' needs.

## Recommendations

*The district/county should:*

1. Evaluate whether it can reduce its staffing for adapted physical education teachers, credentialed school nurses, occupational therapists, physical therapists, school psychologists, and SLPs to align with industry standards while still meeting students' needs.
2. Continue to open applicant pools annually to recruit and fill as many school psychologist and SLP positions as possible with district/county employees.
3. Evaluate the number of days physical therapists and occupational therapists employed in district/county positions work, and determine if it can reduce those days to align with industry standards while still meeting students' needs.
4. Begin opening applicant pools for occupational therapists and physical therapists to increase the number of district/county-employed staff in these positions.

# Unrestricted General Fund Contribution to Special Education

## Fiscal Background

California's special education funding structure was established by and is commonly referred to as Assembly Bill (AB) 602, which was introduced and signed into law in 1997 and became effective during the 1998-99 fiscal year.

Under AB 602, special education funding is based on the average daily attendance (ADA) of all students in a school district, regardless of the number of students served in special education programs or the cost to serve them. California distributes special education funds to SELPAs based on their member districts' total ADA counts.

In addition to AB 602 state funding, districts receive a small amount of federal funds. These funds are designed to supplement the general education program, not to support a standalone program.

The combined state and federal funds are insufficient to pay for even the most efficient special education programs. Districts make contributions to special education from local resources generated by all students, including those in special education. These contributions are the amount of funding districts must transfer from their unrestricted general funds to pay for the portion of special education costs that exceeds program revenues.

Federal law requires districts to spend at least the same amount of state and local funds on special education services in each successive year. This is commonly referred to as the maintenance of effort (MOE). There are limited exceptions to this requirement, and if a district is considering reductions to its total general fund contribution to special education, it is required to follow the guidelines in the MOE document (20 USC 1413 (a)(2)(B)). The IDEA lists the following circumstances as exceptions that allow a district to reduce the amount of state and local funds it spends on special education:

- i. Voluntary departure, by retirement or otherwise, or departure for just cause, of special education or related services personnel;
- ii. A decrease in the enrollment of children with disabilities;
- iii. The termination of the obligation of the agency to provide a program of special education to a particular child with a disability that is an exceptionally costly program, as determined by the state educational agency, because the child:
  - a. Has left the jurisdiction of the agency;
  - b. Has reached the age at which the obligation of the agency to provide free and appropriate public education (FAPE) to the child has terminated; or
  - c. No longer needs the program of special education; or
- iv. The termination of costly expenditures for long-term purchases, such as the acquisition of equipment or the construction of school facilities.

The year-end expenditures charged to special education goal codes in the Standardized Account Code Structure (SACS), which is the state's financial reporting format, are used to calculate special education MOE. If special education savings are included in the district's fiscal recovery plan, the MOE requirement

must be taken into consideration. Districts need to monitor their MOE throughout the year and analyze forecasts of MOE calculations at first and second interim financial reporting periods. Districts should be mindful of what expenses are charged to special education SACS goal codes, including for non-special education SACS resource codes, because those may increase the MOE. In addition, districts should monitor reductions in expenditures to determine if any meet one of the exceptions that may allow the district to reduce the amount of state and local funds it spends on special education.

## Building Comparable Data

Resource codes in the SACS are used to identify revenues and expenditures that have specific accounting or reporting requirements or that are legally restricted. Special education SACS resource codes are used to record special education spending and therefore contain vital information about a district's unrestricted general fund contribution to its special education program.

The special education financial reporting methods used by districts, county offices of education and SELPAs can vary. For example, the San Francisco Unified School District and county office include legal/settlement and transportation costs in this reporting, while other districts and county offices exclude them. There are also differences in how special education funds are allocated by SELPAs. Because of these differences, it is not always possible to accurately compare a district's unrestricted general fund contribution to those of other districts. However, a district should evaluate a contribution that is excessive compared to other districts or that is increasing disproportionately compared to other costs.

To calculate an unrestricted general fund contribution amount that can be compared year to year and includes expenditures most districts classify as special education, FCMAT made the following adjustments to the district/county's SACS data:

- FCMAT combined special education income and expenses from the district and county office of education to account for a large difference in the amount of income and expenses held at the county level versus those passed on to the district during the review period. For example, students attending an NPS were typically reported to CALPADS as county office of education students, but the ADA income and expenditures for those students were reported as district revenue and expenses.
- To improve multiyear continuity, FCMAT used only ongoing special education income. FCMAT removed one-time funding totaling \$4,855,574 in 2021-22, \$3,328,726 in 2022-23, and \$24,748 in 2023-24. It appears that special education expenditures charged to these one-time state and federal income sources were ongoing and were budgeted by the district/county as such beginning in 2024-25.
- FCMAT used only special education expenses in the comparison. During the review period, the district charged some non-special education expenditures to special education SACS resource codes. These non-special education expenses increased significantly in the 2024-25 budget, which budgeted \$597,762 in non-special education expenses to special education resources. To ensure that the unrestricted general fund contributions analyzed are attributed solely to special education services, FCMAT excluded these non-special education expenses in the 2024-25 budget from its calculation.
- The district included in its MOE the impact of special education expenses charged to one-time non-special education SACS resource codes. Because these expenses were made from non-special education one-time revenue sources, they did not require a district con-

tribution. These one-time revenues caused large one-time reductions in the unrestricted general fund contribution to special education and included the following:

- Elementary and Secondary School Emergency Relief Fund (ESSER).
- The Arts, Music and Instructional Materials block grant.
- Community Schools Partnership Program funds and the Extended Learning Opportunities Program grant.
- In-Person Instruction grant.
- Learning Loss Mitigation funding.
- A-G Completion Improvement grant program funds.
- County Safe Schools for All funds.

FCMAT added the following amounts back for comparison purposes: \$7.2 million in 2020-21, \$34.9 million in 2021-22, \$2.6 million in 2022-23 and \$1.8 million in 2023-24. The impact of the one-time funding on the unrestricted general fund contribution dropped to \$0.3 million in the 2024-25 budget as these funds were exhausted.

- Full indirect costs have not been charged to all special education programs using the CDE's approved rates for all the comparison years. In 2021-22, 2022-23, 2023-24, the district/county charged full indirect costs to all special education grant programs. The district/county used an indirect cost rate of 4.49% in its 2024-25 adopted budget and multiyear fiscal projections. The best practice is to charge the full indirect rate to all programs, including those with special education SACS resource codes, so that the true cost of the special education program can be determined. For continuity of data, FCMAT charged the full indirect cost rate to all special education programs for all the comparison years.

Even with these adjustments, the district/county's general fund contribution trend does not directly correlate to its increases in total special education expenditures or special education MOE. This is because of the following:

- Expenditures with special education SACS goal codes have been charged inconsistently to non-special education SACS resource codes. FCMAT assumed that these expenses will continue to be charged to the same non-special education resources that they were budgeted to in 2024-25. These resources mainly include the following: the unrestricted general fund, Extended Learning Opportunities Program, Elementary and Secondary Education Act (ESEA) Title I, ESEA Schoolwide funds, and other local income. FCMAT estimates the impact of this to be a decrease in the unrestricted general fund contribution of \$9.4 million in 2020-21, \$21.8 million in 2021-22, \$37.4 million in 2022-23, \$42.7 million in 2023-24, and a projected \$33.1 million in 2024-25.
- Transportation expenses are included in total special education expenditures for MOE purposes but are reported separately in Table 34 below. This is because transportation income is not reported since the California School Accounting Manual has not developed a method to match the income with the expense. For 2024-25, the district/county's transportation expenses will increase its special education MOE by \$36.9 million. However, the estimated \$16.4 million in special education transportation income for 2024-25 is not credited to the SACS special education goal code.

## District/County Special Education Expenses

FCMAT analyzed the district/county's special education income and expenditures, using only ongoing income from fiscal years 2021-22 to 2024-25 (one-time 2021-22, 2022-23 and 2023-24 income was excluded), as shown in Table 34 below.

**Table 34: Comparison of Special Education Expenses Using Ongoing Income Only, 2021-22 through 2024-25**

Category	Historical 2021-22	Historical 2022-23	Historical 2023-24	Projected 2024-25	Average Historical Annual Rate
Increase/Decrease in Special Education Students	-8.26%	6.10%	3.06%	N/A	N/A
Increase in Ongoing Income	6.88%	7.55%	8.55%	3.35%	2.96%
Increase in Certificated Salaries	-0.96%	2.21%	13.54%	5.8%	4.98%
Increase/Decrease in Classified Salaries	-1.28%	-2.16%	33.39%	5.75%	9.62%
Increase/Decrease in Benefits	-0.08%	2.95%	13.68%	19.22%	5.65%
Increase/Decrease in Books and Supplies	38.38%	12.94%	11.19%	-44.05%	24.59%
Increase/Decrease in Services (Excluding Transportation)	4.59%	37.57%	36.45%	-55.8%	32.11%
Increase in Transportation	402.31%	4.15%	11.34%	20.10%	160.83%
Tuition Excess Costs/Indirect Costs	-6.90%	48.96%	-41.56%	166.10%	-32.67%
Increase/Decrease in Adjusted General Fund Contribution	18.87%	21.23%	14.83%	-9.90%	-9.90%
Adjusted Dollar Amount of General Fund Contribution	\$144,479,963	\$155,582,066	\$196,336,787	\$172,728,735	N/A
Adjusted Dollar Amount of Special Education Expenses	\$211,676,217	\$226,856,553	\$269,595,447	\$242,097,866	N/A

Sources: Official SACS unaudited actuals. 2024-25 data was projected using SACS first interim actual year-to-date expenses extrapolated using 2023-24 SACS first interim-to-unaudited actual ratios, base 2023-24 salaries and benefits and settlements, and both district and county office of education expenses charged to special education SACS goal codes.

Notes: Official SACS unaudited actuals and 2024-25 income and general fund contribution data were reduced by one-time income in 2020-21, 2021-22, 2022-23, and 2023-24, and expenses were adjusted to include full indirect costs. Ongoing costs charged to non-special education resources are included in the total cost of the program but do not have a fiscal impact on the district/county contribution.

Amounts and percentages in the "Increase in Ongoing Income," "Increase/Decrease in Adjusted General Fund Contribution," and "Adjusted Dollar Amount of General Fund Contribution" categories were adjusted to exclude expenses charged to non-special education ongoing income, and to add full indirect costs for any year the district/county did not charge it.

The "Adjusted Dollar Amount of Special Education Expenses" category was adjusted to match footnoted entries in the district/county's budget.

The average increase in ongoing special education funding over the last four years has been 2.96% per year. All district/county employee group salaries increased more than funding from 2020-21 through 2023-24. In addition to all negotiated salary increases, there were average annual expenditure increases of more than 59% in other paraeducator positions and/or services, 41.5% in certificated management positions, and 6.2% in classified management positions.

In 2023-24, special education enrollment increased by 3.06% and income increased by 8.55%, but expenses increased more than the income. Expenses increased in all categories in 2023-24, including large increases in employee salaries. The cost of services increased by 36.45% that year. Staff reported that the number of students attending an NPS has been historically underreported to CALPADS, and the district/county has not conducted a cost-per-student analysis, which is required to identify and support the annual filing for extraordinary cost pool reimbursement for NPS/LCI and mental health services under EC 56836.21. The Special Education Extraordinary Cost Pool for NPS/LCI is ongoing state funding that was increased by almost 700% in 2022-23. Staff reported that the district/county has not submitted extraordinary cost pool claims in recent years because of multiple transitions among staff who would have completed this task. However, the district/county did submit an extraordinary cost pool claim to the CDE for 2023-24.

In 2023-24, the district/county's average annual cost for a student to attend an NPS was \$75,594. The total cost of NPA/NPS expenses per student for all identified special education students has increased from \$4,362 in 2021-22 to \$7,644 in 2023-24. This is an increase of 75.24% even though the ADA generated by NPS students appears relatively unchanged over that review period.

An analysis of the services detail shows that legal fee and settlement costs decreased by 52% from 2022-23 through 2023-24. Thus, the increase in service costs was probably not driven by one-time expenditures. Transportation costs continue to increase but at a slower rate than the costs for other services.

The district/county's 2024-25 first interim budget for services, after accounting for estimated NPS and transportation expenses, has only \$2.4 million in budgeted funding to cover other contracted services, including legal fees, settlements and NPA expenses. It is essential that the district/county properly identify and track transportation costs and expenses for students attending an NPS so that budgeting and decision making can be based on historical data.

## District/County Unrestricted General Fund Contribution

The district/county's adjusted unrestricted general fund contributions, including expenditures for increased indirect costs and increases or reductions for one-time income and redirected income, are shown in Table 35 below.

**Table 35: District/County's Adjusted Unrestricted General Fund Contributions to Special Education, 2020-21 through 2023-24**

Category	2020-21	2021-22	2022-23	2023-24
Adjusted Unrestricted General Fund Contribution	\$122,443,996	\$144,479,963	\$155,582,066	\$196,336,787
Percentage of Adjusted Special Education Costs	68.68%	70.64%	70.47%	74.45%

Sources: Official SACS unaudited actuals data for the district and county office of education.

Note: Official SACS unaudited actuals income and unrestricted general fund contribution data were adjusted for one-time income in 2020-21, 2021-22, 2022-23 and 2023-24. They were also adjusted to add expenses for full indirect costs for any year those costs were not charged by the district/county.

In 2023-24, the district/county's unrestricted general fund contribution (adjusted to add full indirect costs to special education program expenditures and to include the impact of one-time income) was 74.45% of adjusted special education costs. The fluctuations in expenses observed in 2020-21 and 2021-22 were associated with declines in expenses during periods when students were generally not in attendance

because of the COVID-19 pandemic. In 2023-24, the district/county incurred significant employee collective bargaining settlement costs and increased staffing expenses.

In 2024-25, the district/county's unrestricted general fund contribution as a percentage of total special education costs, inclusive of indirect costs, was budgeted significantly lower and is projected to decrease to 73.86% based on first interim actual projections and the district/county budget.

## Recommendations

*The district/county should:*

1. Continue to monitor its unrestricted general fund contribution to the special education program.
2. Consistently charge full indirect costs to special education programs.
3. Monitor and track transportation and NPS costs, and annually analyze trend data to use for budgeting.
4. Develop a system to track the expenditures for individual students who are attending an NPS so it can determine whether those expenses may qualify for extraordinary cost pool reimbursement.
5. Monitor and track special education expenses charged to non-special education resources so that the full cost of the program can be monitored and MOE can be managed.

# Appendices

## Appendix A — District/County Resource Specialist Staffing by School, 2024-25

School	Total RSP Teacher FTE	Total RSP Student Caseload	Average Teacher Caseload	Staffing Needed to Meet RSP Teacher-to-Student Ratio of 1-to-22	Staffing FTE Above (+) or Below (-) District/County Staffing Guide Ratio of 1-to-22
Washington (George) High School (HS)	10	250	25.00	11.36	-1.36
Galileo HS	6	160	26.67	7.27	-1.27
Lakeshore Elementary School (ES)	1	49	49.00	2.23	-1.23
Carmichael (Bessie) K-8	3	90	30.00	4.09	-1.09
Asawa (Ruth) SOTA HS	3	89	29.67	4.05	-1.05
Mission HS	7	174	24.86	7.91	-0.91
Burton (Phillip and Sala) HS	6	148	24.67	6.73	-0.73
Brown Jr. (Willie) Middle School (MS)	2	57	28.50	2.59	-0.59
Denman (James) MS	4	101	25.25	4.59	-0.59
Lilienthal (Claire) K-8	1	34	34.00	1.55	-0.55
Creative Arts K-8 Charter	1.8	51	28.33	2.32	-0.52
McKinley ES	1	33	33.00	1.50	-0.50
Tenderloin Community ES	1	33	33.00	1.50	-0.50
Key (Francis Scott) ES	1	31	31.00	1.41	-0.41
Miraloma ES	1	31	31.00	1.41	-0.41
Muir (John) ES	1	31	31.00	1.41	-0.41
Lincoln (Abraham) HS	8	185	23.13	8.41	-0.41
Rooftop K-8	3	74	24.67	3.36	-0.36
Huerta (Dolores) ES	1	28	28.00	1.27	-0.27

School	Total RSP Teacher FTE	Total RSP Student Caseload	Average Teacher Caseload	Staffing Needed to Meet RSP Teacher-to-Student Ratio of 1-to-22	Staffing FTE Above (+) or Below (-) District/County Staffing Guide Ratio of 1-to-22
Webster (Daniel) ES	1	27	27.00	1.23	-0.23
Ulloa ES	1	26	26.00	1.18	-0.18
Taylor (Edward R) ES	2	48	24.00	2.18	-0.18
Sloat (Commodore) ES, Mission Education Center ES	0.7	19	27.14	0.86	-0.16
Balboa HS	9	201	22.33	9.14	-0.14
Guadalupe ES	1	25	25.00	1.14	-0.14
Alvarado ES	2	46	23.00	2.09	-0.09
Buena Vista Horace Mann K-8	3.5	79	22.57	3.59	-0.09
Moscone (George R) ES	1.5	35	23.33	1.59	-0.09
West Portal ES	1.5	35	23.33	1.59	-0.09
Wallenberg (Raoul) HS	5	111	22.20	5.05	-0.05
Cobb (Dr William L) ES	1	23	23.00	1.05	-0.05
Longfellow ES	2	45	22.50	2.05	-0.05
Sunnyside ES	1.5	34	22.67	1.55	-0.05
Feinstein (Dianne) ES	2	44	22.00	2.00	0.00
Flynn (Leonard R) ES	2	42	21.00	1.91	0.09
Yu (Alice Fong) K-8	1.5	33	22.00	1.50	0.00
Hillcrest ES	1	21	21.00	0.95	+0.05
Milk (Harvey) Civil Right ES	1	21	21.00	0.95	+0.05
SF Community K-8	1	21	21.00	0.95	+0.05
Chin (John Yehall) ES	0.5	10	20.00	0.45	+0.05
Presidio MS	5	108	21.60	4.91	+0.09
Parker (Jean) ES	0.5	9	18.00	0.41	+0.09
Lau (Gordon J) ES	1	20	20.00	0.91	+0.09

School	Total RSP Teacher FTE	Total RSP Student Caseload	Average Teacher Caseload	Staffing Needed to Meet RSP Teacher-to-Student Ratio of 1-to-22	Staffing FTE Above (+) or Below (-) District/County Staffing Guide Ratio of 1-to-22
Peabody (George) ES	1	20	20.00	0.91	+0.09
Revere (Paul) K-8	1	20	20.00	0.91	+0.09
Redding ES	0.8	15	18.75	0.68	+0.12
Bryant ES	1	19	19.00	0.86	+0.14
McCoppin (Frank) ES	1	19	19.00	0.86	+0.14
Sutro ES	1	19	19.00	0.86	+0.14
Chavez (Cesar) ES	2	41	20.50	1.86	+0.14
Visitacion Valley MS	3	62	20.67	2.82	+0.18
Marshall ES	1	18	18.00	0.82	+0.18
New Traditions ES	1	18	18.00	0.82	+0.18
SAN FRANCISCO PUBLIC MONTESSORI CDC	1	18	18.00	0.82	+0.18
Stevenson (Robert Louis) ES	1	18	18.00	0.82	+0.18
Wo (Yick) ES	1	18	18.00	0.82	+0.18
Sanchez ES	1.5	29	19.33	1.32	+0.18
Alamo ES	1	17	17.00	0.77	+0.23
Argonne ES	1	17	17.00	0.77	+0.23
Clarendon ES	2	39	19.50	1.77	+0.23
Giannini (A.P.) MS	6	127	21.17	5.77	+0.23
Lick (James) MS	5	104	20.80	4.73	+0.27
Lowell HS	4.5	93	20.67	4.23	+0.27
Francisco MS	2	38	19.00	1.73	+0.27
Spring Valley Science ES	1	16	16.00	0.73	+0.27
Lafayette ES	3	60	20.00	2.73	+0.27
Jefferson ES	2	37	18.50	1.68	+0.32
Malcolm X Academy ES	1	15	15.00	0.68	+0.32
Wells (Ida B) HS	1	15	15.00	0.68	+0.32
Glen Park ES	2	36	18.00	1.64	+0.36

School	Total RSP Teacher FTE	Total RSP Student Caseload	Average Teacher Caseload	Staffing Needed to Meet RSP Teacher-to-Student Ratio of 1-to-22	Staffing FTE Above (+) or Below (-) District/County Staffing Guide Ratio of 1-to-22
Monroe ES	2	36	18.00	1.64	+0.36
Serra (Junipero) ES	2	36	18.00	1.64	+0.36
Cleveland ES	1	14	14.00	0.64	+0.36
Sunset ES	1	14	14.00	0.64	+0.36
Drew (Dr Charles) College Preparatory Academy ES	1	13	13.00	0.59	+0.41
Grattan ES	2	35	17.50	1.59	+0.41
El Dorado ES	1	12	12.00	0.55	+0.45
Marina MS	3	56	18.67	2.55	+0.45
Jordan (June) HS	2	33	16.50	1.50	+0.50
Garfield ES	1.5	21	14.00	0.95	+0.55
Gateway MS Charter	6.5	128	19.69	5.82	+0.68
Hilltop HS	1	7	7.00	0.32	+0.68
The Academy - SF @ McAteer HS	2	29	14.50	1.32	+0.68
Youth Chance High School	1	7	7.00	0.32	+0.68
SF International HS	1	6	6.00	0.27	+0.73
Hoover (Herbert) MS	5	94	18.80	4.27	+0.73
C.A.R.E. Buchanan	1	5	5.00	0.23	+0.77
Harte (Bret) ES	2	27	13.50	1.23	+0.77
Lawton K-8	2	26	13.00	1.18	+0.82
Aptos MS	6	114	19.00	5.18	+0.82
Everett MS	3	47	15.67	2.14	+0.86
Sherman ES	3	46	15.33	2.09	+0.91
C.A.R.E. Bayview	1	1	1.00	0.05	+0.95
SF Civic Center Secondary HS	2	23	11.50	1.05	+0.95
King Jr (Dr Martin L) MS	4	66	16.50	3.00	+1.00
Marshall (Thurgood) HS	3	42	14.00	1.91	+1.09
Roosevelt MS	4	63	15.75	2.86	+1.14

School	Total RSP Teacher FTE	Total RSP Student Caseload	Average Teacher Caseload	Staffing Needed to Meet RSP Teacher-to-Student Ratio of 1-to-22	Staffing FTE Above (+) or Below (-) District/County Staffing Guide Ratio of 1-to-22
Independence HS	5	81	16.20	3.68	+1.32
O'Connell (John) HS	6	98	16.33	4.45	+1.55
Downtown HS	3	24	8.00	1.09	+1.91

Sources: District/county-provided allocation data and District/County Special Education School Site Staffing Guide School Year 2024-2025.

Note: 8.0 FTE of the RSP teachers assigned to the preschool program and the 72 preschool students they support, and 4.0 FTE of the RSP teachers who were not assigned to a school and the 58 students they support were removed for this analysis. The resulting dataset included 236.8 FTE of the district/county's RSP teachers who managed the cases of 4,884 RSP students.

# Appendix B — District/County's Special Education Paraeducator SDC Staff Compared to Industry Standards

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator(s) to Students Ratio	Industry Standard Teacher and Classroom Support Paraeducator(s) to Students Ratio	Staffing Above or Below Industry Standard
Alamo Elementary School (ES)	Extensive Needs Autism Focus	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Aligned with Industry Standard
Alamo ES	Extensive Needs Autism Focus	7	2	3-to-7 or 0.43	1-to-3 or 0.33	Aligned with Industry Standard
Alvarado ES	Extensive Needs	10	2	3-to-10 or 0.30	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Alvarado ES	Extensive Needs	11	2	3-to-11 or 0.27	1-to-5 or 0.20	Aligned with Industry Standard
AP Giannini Middle School (MS)	Mild-to-Moderate Needs	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Aligned with Industry Standard
AP Giannini MS	Mild-to-Moderate Needs	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Aligned with Industry Standard
AP Giannini MS	Mild-to-Moderate Needs Autism Focus	12	2	3-to-12 or 0.25	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
AP Giannini MS	Extensive Needs	9	2	3-to-9 or 0.33	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
AP Giannini MS	Extensive Needs Autism Focus	8	2	3-to-8 or 0.38	1-to-3 or 0.33	Aligned with Industry Standard
Aptos MS	Mild-to-Moderate Needs	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Aligned with Industry Standard
Aptos MS	Mild-to-Moderate Needs	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Aligned with Industry Standard

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator(s) to Students Ratio	Industry Standard Teacher and Classroom Support Paraeducator(s) to Students Ratio	Staffing Above or Below Industry Standard
Aptos MS	Extensive Needs Autism Focus	8	2	3-to-8 or 0.38	1-to-3 or 0.33	Aligned with Industry Standard
Argonne ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
Argonne ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
Balboa High School (HS)	Mild-to-Moderate Needs	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Aligned with Industry Standard
Balboa HS	Mild-to-Moderate Needs	9	1	2-to-9 or 0.22	1-to-7 or 0.14	Aligned with Industry Standard
Balboa HS	Mild-to-Moderate Needs	9	1	2-to-9 or 0.22	1-to-7 or 0.14	Aligned with Industry Standard
Balboa HS	Mild-to-Moderate Needs	9	1	2-to-9 or 0.22	1-to-7 or 0.14	Aligned with Industry Standard
Balboa HS	Extensive Needs	10	2	3-to-10 or 0.30	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Balboa HS	Extensive Needs	9	2	3-to-9 or 0.33	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Buena Vista Horace Mann K-8	Mild-to-Moderate Needs	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Aligned with Industry Standard
Buena Vista Horace Mann K-8	Mild-to-Moderate Needs	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Aligned with Industry Standard
Burton HS	Mild-to-Moderate Needs	8	1	2-to-8 or 0.25	1-to-7 or 0.14	Aligned with Industry Standard
Burton HS	Extensive Needs	8	2	3-to-8 or 0.38	1-to-5 or 0.20	1 Paraeducator Above Industry Standard

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator(s) to Students Ratio	Industry Standard Teacher and Classroom Support Paraeducator(s) to Students Ratio	Staffing Above or Below Industry Standard
Burton HS	Extensive Needs	9	2	3-to-9 or 0.33	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Clarendon ES	Mild-to-Moderate Needs	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Aligned with Industry Standard
Clarendon ES	Mild-to-Moderate Needs	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Aligned with Industry Standard
Denman MS	Mild-to-Moderate Needs	15	1	2-to-15 or 0.13	1-to-7 or 0.14	Aligned with Industry Standard
Denman MS	Extensive Needs	9	1	2-to-9 or 0.22	1-to-5 or 0.20	Aligned with Industry Standard
Denman MS	Mild-to-Moderate Needs Autism Focus	11	2	3-to-11 or 0.27	1-to-3 or 0.33	Aligned with Industry Standard
EI Dorado ES	Mild-to-Moderate Needs Autism Focus	12	2	3-to-12 or 0.25	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
EI Dorado ES	Mild-to-Moderate Needs Autism Focus	11	2	3-to-11 or 0.27	1-to-3 or 0.33	Aligned with Industry Standard
Everett MS	Mild-to-Moderate Needs	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Aligned with Industry Standard
Everett MS	Mild-to-Moderate Needs Autism Focus	8	2	3-to-8 or 0.38	1-to-3 or 0.33	Aligned with Industry Standard
Francisco MS	Mild-to-Moderate Needs	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Aligned with Industry Standard
Francisco MS	Extensive Needs Autism Focus	7	2	3-to-7 or 0.43	1-to-3 or 0.33	Aligned with Industry Standard

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator(s) to Students Ratio	Industry Standard Teacher and Classroom Support Paraeducator(s) to Students Ratio	Staffing Above or Below Industry Standard
Galileo HS	Mild-to-Moderate Needs	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Aligned with Industry Standard
Galileo HS	Mild-to-Moderate Needs	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Aligned with Industry Standard
Galileo HS	Mild-to-Moderate Needs	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Aligned with Industry Standard
Galileo HS	Mild-to-Moderate Needs Autism Focus	6	2	3-to-6 or 0.50	1-to-3 or 0.33	1 Paraeducator Above Industry Standard
Galileo HS	Extensive Needs	12	2	3-to-12 or 0.25	1-to-5 or 0.20	Aligned with Industry Standard
Garfield ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
Garfield ES	Mild-to-Moderate Needs Autism Focus	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Aligned with Industry Standard
Glen Park ES	Extensive Needs Autism Focus	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Aligned with Industry Standard
Glen Park ES	Extensive Needs Autism Focus	9	2	3-to-9 or 0.33	1-to-3 or 0.33	Aligned with Industry Standard
Grattan ES	Extensive Needs Autism Focus	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Aligned with Industry Standard
Grattan ES	Extensive Needs Autism Focus	9	2	3-to-9 or 0.33	1-to-3 or 0.33	Aligned with Industry Standard
Harte (Bret) ES	Mild-to-Moderate Needs	8	1	2-to-8 or 0.25	1-to-7 or 0.14	Aligned with Industry Standard
Hillcrest ES	Mild-to-Moderate Needs	6	1	2-to-6 or 0.33	1-to-7 or 0.14	Aligned with Industry Standard

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator(s) to Students Ratio	Industry Standard Teacher and Classroom Support Paraeducator(s) to Students Ratio	Staffing Above or Below Industry Standard
Hillcrest ES	1-3 / Mild-to-Moderate Needs	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Aligned with Industry Standard
Hillcrest ES	4-5 / Mild-to-Moderate Needs	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Aligned with Industry Standard
Hoover MS	Mild-to-Moderate Needs	14	1	2-to-14 or 0.14	1-to-7 or 0.14	Aligned with Industry Standard
Hoover MS	Mild-to-Moderate Needs Autism Focus	2	1	2-to-2 or 1.00	1-to-3 or 0.33	Aligned with Industry Standard
Huerta (Dolores) ES	Extensive Needs	10	2	3-to-10 or 0.30	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Huerta (Dolores) ES	Extensive Needs	6	2	3-to-6 or 0.50	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Jefferson ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
Jefferson ES	Mild-to-Moderate Needs Autism Focus	11	2	3-to-11 or 0.27	1-to-3 or 0.33	Aligned with Industry Standard
June Jordan HS	Mild-to-Moderate Needs	3	1	2-to-3 or 0.67	1-to-7 or 0.14	Aligned with Industry Standard Since Base Staffing Is 1 Paraeducator for This Type of Class
June Jordan HS	Mild-to-Moderate Needs Autism Focus	8	2	3-to-8 or 0.38	1-to-3 or 0.33	Aligned with Industry Standard
Key (Francis Scott) ES	Extensive Needs	7	2	3-to-7 or 0.43	1-to-5 or 0.20	1 Paraeducator Above Industry Standard

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator(s) to Students Ratio	Industry Standard Teacher and Classroom Support Paraeducator(s) to Students Ratio	Staffing Above or Below Industry Standard
Key (Francis Scott) ES	Extensive Needs	6	2	3-to-6 or 0.50	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
King (Thomas Starr) ES	Extensive Needs Autism Focus	11	2	3-to-11 or 0.27	1-to-3 or 0.33	Aligned with Industry Standard
King (Thomas Starr) ES	Extensive Needs Autism Focus	6	2	3-to-6 or 0.50	1-to-3 or 0.33	1 Paraeducator Above Industry Standard
Lakeshore ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
Lakeshore ES	Mild-to-Moderate Needs Autism Focus	11	2	3-to-11 or 0.27	1-to-3 or 0.33	Aligned with Industry Standard
Lakeshore ES	Mild-to-Moderate Needs Autism Focus	12	2	3-to-12 or 0.25	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
Lawton K-8	Extensive Needs	10	2	3-to-10 or 0.30	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Lawton K-8	Extensive Needs	10	2	3-to-10 or 0.30	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Lawton K-8	Extensive Needs	10	2	3-to-10 or 0.30	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Lick MS	Mild-to-Moderate Needs	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Aligned with Industry Standard
Lick MS	Mild-to-Moderate Needs	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Aligned with Industry Standard
Lincoln HS	Mild-to-Moderate Needs	9	1	2-to-9 or 0.22	1-to-7 or 0.14	Aligned with Industry Standard
Lincoln HS	Mild-to-Moderate Needs	9	1	2-to-9 or 0.22	1-to-7 or 0.14	Aligned with Industry Standard

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator(s) to Students Ratio	Industry Standard Teacher and Classroom Support Paraeducator(s) to Students Ratio	Staffing Above or Below Industry Standard
Lincoln HS	Mild-to-Moderate Needs	9	1	2-to-9 or 0.22	1-to-7 or 0.14	Aligned with Industry Standard
Lincoln HS	Mild-to-Moderate Needs	9	1	2-to-9 or 0.22	1-to-7 or 0.14	Aligned with Industry Standard
Lincoln HS	Mild-to-Moderate Needs	8	1	2-to-8 or 0.25	1-to-7 or 0.14	Aligned with Industry Standard
Lincoln HS	Mild-to-Moderate Needs	8	1	2-to-8 or 0.25	1-to-7 or 0.14	Aligned with Industry Standard
Lincoln HS	Extensive Needs	11	1	2-to-11 or 0.18	1-to-5 or 0.20	Aligned with Industry Standard
Lincoln HS	Mild-to-Moderate Needs Autism Focus	12	2	3-to-12 or 0.25	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
Lincoln HS	Extensive Needs Autism Focus	6	2	3-to-6 or 0.50	1-to-3 or 0.33	1 Paraeducator Above Industry Standard
Lincoln HS	Extensive Needs Autism Focus	6	2	3-to-6 or 0.50	1-to-3 or 0.33	1 Paraeducator Above Industry Standard
Longfellow ES	Mild-to-Moderate Needs	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Aligned with Industry Standard
Longfellow ES	Mild-to-Moderate Needs	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Aligned with Industry Standard
Lowell HS	Mild-to-Moderate Needs	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Aligned with Industry Standard
Lowell HS	Mild-to-Moderate Needs	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Aligned with Industry Standard
Lowell HS	Mild-to-Moderate Needs Autism Focus	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Aligned with Industry Standard

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator(s) to Students Ratio	Industry Standard Teacher and Classroom Support Paraeducator(s) to Students Ratio	Staffing Above or Below Industry Standard
Lowell HS	Extensive Needs	9	2	3-to-9 or 0.33	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Lowell HS	Extensive Needs	10	2	3-to-10 or 0.30	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Lowell HS	Extensive Needs Autism Focus	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Aligned with Industry Standard
Lowell HS	Extensive Needs Autism Focus	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Aligned with Industry Standard
Marina MS	Mild-to-Moderate Needs	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Aligned with Industry Standard
Marina MS	Mild-to-Moderate Needs Autism Focus	8	2	3-to-8 or 0.38	1-to-3 or 0.33	Aligned with Industry Standard
McKinley ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
McKinley ES	Mild-to-Moderate Needs Autism Focus	9	2	3-to-9 or 0.33	1-to-3 or 0.33	Aligned with Industry Standard
Miraloma ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
Miraloma ES	Mild-to-Moderate Needs Autism Focus	12	2	3-to-12 or 0.25	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
Mission HS	Mild-to-Moderate Needs	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Aligned with Industry Standard
Mission HS	Mild-to-Moderate Needs	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Aligned with Industry Standard

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator(s) to Students Ratio	Industry Standard Teacher and Classroom Support Paraeducator(s) to Students Ratio	Staffing Above or Below Industry Standard
Mission HS	Mild-to-Moderate Needs	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Aligned with Industry Standard
Mission HS	Extensive Needs	9	2	3-to-9 or 0.33	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Mission HS	Extensive Needs	9	2	3-to-9 or 0.33	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Mission HS	Extensive Needs Autism Focus	8	2	3-to-8 or 0.38	1-to-3 or 0.33	Aligned with Industry Standard
MLK MS	Mild-to-Moderate Needs	7	1	2-to-7 or 0.29	1-to-7 or 0.14	1 Paraeducator Above Industry Standard
MLK MS	Mild-to-Moderate Needs	6	1	2-to-6 or 0.33	1-to-7 or 0.14	1 Paraeducator Above Industry Standard
O'Connell HS	Mild-to-Moderate Needs	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Aligned with Industry Standard
O'Connell HS	Mild-to-Moderate Needs	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Aligned with Industry Standard
Peabody (George) ES	Mild-to-Moderate Needs	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Aligned with Industry Standard
Peabody (George) ES	Mild-to-Moderate Needs	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Aligned with Industry Standard
Peabody (George) ES	Mild-to-Moderate Needs Autism Focus	11	2	3-to-11 or 0.27	1-to-3 or 0.33	Aligned with Industry Standard
Peabody (George) ES	Mild-to-Moderate Needs Autism Focus	9	2	3-to-9 or 0.33	1-to-3 or 0.33	Aligned with Industry Standard
Peabody (George) ES	Mild-to-Moderate Needs Autism Focus	9	2	3-to-9 or 0.33	1-to-3 or 0.33	Aligned with Industry Standard

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator(s) to Students Ratio	Industry Standard Teacher and Classroom Support Paraeducator(s) to Students Ratio	Staffing Above or Below Industry Standard
Presidio MS	Mild-to-Moderate Needs	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Aligned with Industry Standard
Presidio MS	Mild-to-Moderate Needs Autism Focus	11	2	3-to-11 or 0.27	1-to-3 or 0.33	Aligned with Industry Standard
Presidio MS	Extensive Needs	7	2	3-to-7 or 0.43	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Revere (Paul) K-8	Mild-to-Moderate Needs	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Aligned with Industry Standard
Revere (Paul) K-8	Mild-to-Moderate Needs	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Aligned with Industry Standard
Roosevelt MS	Mild-to-Moderate Needs	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Aligned with Industry Standard
Roosevelt MS	Mild-to-Moderate Needs Autism Focus	12	2	3-to-12 or 0.25	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
Roosevelt MS	Extensive Needs Autism Focus	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Aligned with Industry Standard
Ruth Asawa School of the Arts HS	Mild-to-Moderate Needs	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Aligned with Industry Standard
Sanchez ES	Mild-to-Moderate Needs	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Aligned with Industry Standard
Sanchez ES	Mild-to-Moderate Needs	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Aligned with Industry Standard
Sherman ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	1 Paraeducator Below Industry Standard

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator(s) to Students Ratio	Industry Standard Teacher and Classroom Support Paraeducator(s) to Students Ratio	Staffing Above or Below Industry Standard
Sherman ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
Spring Valley Science ES	Mild-to-Moderate Needs	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Aligned with Industry Standard
Spring Valley Science ES	Mild-to-Moderate Needs	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Aligned with Industry Standard
Stevenson (Robert Louis) ES	Mild-to-Moderate Needs	13	1	2-to-13 or 0.15	1-to-7 or 0.14	Aligned with Industry Standard
Stevenson (Robert Louis) ES	Mild-to-Moderate Needs	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Aligned with Industry Standard
Stevenson (Robert Louis) ES	Mild-to-Moderate Needs	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Aligned with Industry Standard
Sunnyside ES	Extensive Needs	7	2	3-to-7 or 0.43	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Sunnyside ES	Extensive Needs	5	2	3-to-5 or 0.60	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Sunset ES	Extensive Needs Autism Focus	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Aligned with Industry Standard
Sunset ES	Extensive Needs Autism Focus	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Aligned with Industry Standard
Taylor (Edward R) ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
Taylor (Edward R) ES	Mild-to-Moderate Needs Autism Focus	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Aligned with Industry Standard

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator(s) to Students Ratio	Industry Standard Teacher and Classroom Support Paraeducator(s) to Students Ratio	Staffing Above or Below Industry Standard
Tenderloin Community ES	Mild-to-Moderate Needs Autism Focus	13	2	3-to-13 or 0.23	1-to-3 or 0.33	1 Paraeducator Below Industry Standard
Thurgood Marshall HS	Mild-to-Moderate Needs	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Aligned with Industry Standard
Vis Valley MS	Mild-to-Moderate Needs	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Aligned with Industry Standard
Wallenberg HS	Mild-to-Moderate Needs	12	1	2-to-12 or 0.17	1-to-7 or 0.14	Aligned with Industry Standard
Washington HS	Mild-to-Moderate Needs	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Aligned with Industry Standard
Washington HS	Mild-to-Moderate Needs	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Aligned with Industry Standard
Washington HS	Mild-to-Moderate Needs	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Aligned with Industry Standard
Washington HS	Mild-to-Moderate Needs	11	1	2-to-11 or 0.18	1-to-7 or 0.14	Aligned with Industry Standard
Washington HS	Extensive Needs	7	1	2-to-7 or 0.29	1-to-5 or 0.20	Aligned with Industry Standard
Washington HS	Extensive Needs	7	1	2-to-7 or 0.29	1-to-5 or 0.20	Aligned with Industry Standard
Washington HS	Extensive Needs	8	2	3-to-8 or 0.38	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Washington HS	Extensive Needs	8	2	3-to-8 or 0.38	1-to-5 or 0.20	1 Paraeducator Above Industry Standard
Willie Brown MS	Mild-to-Moderate Needs	10	1	2-to-10 or 0.20	1-to-7 or 0.14	Aligned with Industry Standard

School Site	SDC Class Type	Number of Students	Number of Classroom Paraeducators	Teacher and Classroom Support Paraeducator(s) to Students Ratio	Industry Standard Teacher and Classroom Support Paraeducator(s) to Students Ratio	Staffing Above or Below Industry Standard
Wo (Yick) ES	Extensive Needs Autism Focus	9	2	3-to-9 or 0.33	1-to-3 or 0.33	Aligned with Industry Standard
Wo (Yick) ES	Extensive Needs Autism Focus	10	2	3-to-10 or 0.30	1-to-3 or 0.33	Aligned with Industry Standard

Source: District/county-provided allocation data.

Note: This table shows data for 228 of the district/county classroom special education paraeducators working in an SDC. It excludes data for district/county classroom special education paraeducators working in preschool, deaf/hard of hearing, SOAR, and Access SDCs because FCMAT does not have an industry-standard staffing ratios for those programs.

# Appendix C – Study Agreement



## FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM STUDY AGREEMENT FOR MANAGEMENT ASSISTANCE

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

### **1. BASIS OF AGREEMENT**

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

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

### **2. SCOPE OF THE WORK**

#### **A. Scope and Objectives of the Study**

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

5. Review the district's unrestricted general fund contribution to special education and make recommendations for greater efficiency, if any.
6. The Team will present the final report to the charter's board of trustees at a public meeting after the review is completed.

**B. Services and Products to be Provided**

**1. Orientation Meeting**

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

**2. Fieldwork**

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

**3. Exit Meeting**

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

**4. Exit Letter**

Approximately 10 business days after the exit meeting, the Team will issue an exit letter briefly memorializing the topics discussed in the exit meeting.

**5. Draft Report**

An electronic copy of a preliminary draft report will be delivered to the Client's point of contact identified below for review and comment.

**6. Final Report**

An electronic copy of the final report will be delivered to the Client's point of contact and to the Client's county superintendent of schools following completion of the study. FCMAT's work products are public and all final reports are published on the FCMAT website.

**7. Board Presentation**

Presentations to the Client's board are optional and are made at the request of the Client. If a board presentation is requested, it will be noted in the scope and objectives of the study or can be added as a change in scope at a later date.

**8. Follow-Up Review**

If requested by the Client within six to 12 months after completion of the study,

FCMAT, at no additional cost, will assess the Client's progress in implementing the recommendations included in the report. This follow-up support is primarily a document review-based study. Progress in implementing the recommendations will be documented to the Client in a FCMAT management letter. FCMAT will work with the Client on a mutually convenient time to return for follow-up support that is no sooner than eight months and no later than 18 months after the date of the final report.

### **3. PROJECT PERSONNEL**

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

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

### **4. PROJECT COSTS**

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

- A. \$1,100 per day for each FCMAT staff member while on site conducting fieldwork. The cost of independent FCMAT consultants will be billed at their daily rate for all work performed. On-site is defined as either 1) physically at the Client's office or school site(s), or 2) in a scheduled virtual meeting with the Client's personnel, representatives or others associated with the scope of work pursuant to Section 13 below.
- B. All out-of-pocket expenses, including travel and its associated costs, and miscellaneous items necessary to complete the scope and objectives of the study.
- C. The applicable indirect rate at the time work is performed on the study will be added to all costs billed.
- D. The Client will be invoiced for 50% of the not-to-exceed cost shown below following completion of fieldwork (progress payment) and the remaining amount shall be due upon the issuance of the final report or presentation to the Client's board, whichever is later (final payment). The Parties agree that changes documented in a revised study agreement may change the original not-to-exceed amount shown below. If changes are made before or during fieldwork, the new not-to-exceed amount documented in such a revised study agreement will constitute the basis for the progress payment. If changes are made after fieldwork, 100% of the total changed value documented in a revised study agreement, less progress payments made, will constitute the final payment due. All payments shall be due immediately based on the terms of the invoice.

**Based on the scope and objectives of the study, the total not-to-exceed cost of the study will be \$20,000.**

- E. Any change to the scope of work will affect the total cost. Changes may include, but are not limited to, delays, revisions to the scope of services, and substitution or addition of

personnel. The need for changes shall be communicated by FCMAT to the Client in advance in the form of a revised study agreement.

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

## **5. RESPONSIBILITIES OF THE CLIENT**

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

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

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

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

## **6. PROJECT SCHEDULE**

Time is of the essence. The Parties acknowledge that the goal of the scope and objectives of the study under this Agreement is to produce a timely and thorough report that adds value for the Client. To accomplish this goal, the Parties agree to communicate and mutually agree to honor established time commitments. These commitments include the Client providing

requested documents, setting and keeping interview appointments and returning comments on the draft report consistent with the established project schedule.

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

ACTION	TIMELINE
FCMAT provides the Client with a draft Agreement.	Draft Agreements are usually provided within 20 business days of the Client's initial request for services.
Client returns partially executed Agreement to FCMAT along with the applicable organizational chart and the name and email of the person who will be responsible for collecting and uploading documents requested by FCMAT.	Draft Agreements are valid for 30 business days.
FCMAT returns a fully executed Agreement to the Client and identifies the project schedule and the lead and other personnel assigned to the job.	Within five business days of the Client's return of the signed Agreement.
Client uploads initial requested documents and data to FCMAT's online SharePoint repository.	Within 10 business days of the Client's receipt of the FCMAT document and data request list.
Fieldwork	Mutually agreed upon; usually, to commence within 10 business days of FCMAT's receipt of requested documents and data.
Orientation meeting	First day of fieldwork.
Exit meeting	Last day of fieldwork.
Follow up fieldwork, if needed (e.g., rescheduled interview, additional interviews).	Mutually agreed upon; usually, within five business days of FCMAT's request.
Client uploads supplemental documents and data to FCMAT's online SharePoint repository.	Within two business days of the Client's receipt of FCMAT's supplemental document and data request(s).
Draft report submitted to the Client.	To be determined, usually, within eight weeks of the conclusion of fieldwork and receipt of all documents and data requested.
Client comments on draft report	Within 10 business days of FCMAT providing a draft report to the Client.

The Client acknowledges that project schedule deadlines build upon and are contingent on each previous deadline. Missed deadline dates will affect future deadline dates and ultimately

the timing of the final report. For example, if the Client does not provide requested documents and data by the specified date, the fieldwork may not be able to proceed as originally planned.

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

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

## **7. COMMENCEMENT, TERMINATION AND COMPLETION OF WORK**

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

Prior to completion of fieldwork and upon written notice to FCMAT, the Client may terminate its request for service and will be responsible for all costs incurred by FCMAT to the date of termination under Section 4 (Project Costs). If the Client does not provide written notice of termination prior to completion of fieldwork, the Team will complete its work and deliver its final report and the Client will be responsible for the full costs.

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

## **8. INDEPENDENT CONTRACTOR**

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

## **9. RECORDS**

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

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

## **10. CONTACT WITH PUPILS**

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

## **11. INSURANCE**

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

## **12. HOLD HARMLESS**

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

## **13. PUBLIC SAFETY CONSIDERATIONS**

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

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

## **14. FORCE MAJEURE**

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

## **15. EVALUATION**

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

## **16. CLIENT CONTACT PERSON**

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

Name: Karling Aguilera-Fort, Ed.D.  
Associate Superintendent Education Services

Telephone: (415) 241-6000

Email: [aguilera-fortk1@sfusd.edu](mailto:aguilera-fortk1@sfusd.edu)

## **17. SIGNATURES**

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

Furthermore, the signature below represents a commitment by the district superintendent and board of education to cooperate fully with FCMAT with regard to all aspects of this Agreement.

For Client:



Dr. Matt Wayne, Superintendent  
San Francisco Unified School District

6-14-24

Date

For FCMAT:

**Michael H. Fine**

Digitally signed by Michael H. Fine  
Date: 2024.06.17 15:49:16 -07'00'

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

Date