

Policy Paper No. PP85-11-7

**Seeking Flexibility in School Management:
Waivers and School-Based Program Coordination
Under AB 777**

**David R. Pacheco
and
Public Policy Research, Inc.
*Foreword by Peter M. Birdsall***

November 1985

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This paper was sponsored and published by Policy Analysis for California Education, PACE. PACE is funded by the William and Flora Hewlett Foundation and directed jointly by James W. Guthrie and Michael W. Kirst. The analyses and conclusions in this paper are those of the authors and are not necessarily endorsed by the Hewlett Foundation.

PACE wishes to thank Peter M. Birdsall and Public Policy Research, Inc. for permission to reprint *Documentation of Model Programs for the Implementation of Assembly Bill 777 (School-Based Program Coordination Act)*. Permission granted July 1985.

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Policy Analysis for California Education (PACE)
Berkeley, California
November 1985

CONTENTS

Policy Analysis for California Education.....	v
Foreword	
by Peter M. Birdsall.....	vii
The Waiver Process for California's Education Code	
by David R. Pacheco.....	1
Executive Summary.....	3
Introduction.....	5
Background.....	5
Criteria for Denying Waiver Requests.....	5
Local Dissent and SBE Decisions.....	6
Program (Versus Administration) Waiver Requests Still Rare.....	6
Questions and Recommendations.....	8
Appendix A: Waiver Request	9
Appendix B: 1982 Waiver Actions by Education Code Section	11
Appendix C: General Waiver Authority of the State	
Board of Education	12
Appendix D: Summary of Non-Waivable Education Code Sections	
Under the General Waiver Authority of Education Code Sections	
33050-53	13
Documentation of Model Programs for Implementation of	
Assembly Bill 777 (School-Based Program Coordination Act)	
by Public Policy Research, Inc.	19
Foreword.....	23
Executive Summary.....	25
Introduction.....	31
Chapter 1 -- Method of Study.....	33
Chapter 2 -- Part 1 General Findings	
Participation in School-Based Coordinated Programs.....	37
Decision to Implement.....	37
School Plans.....	39
Identification, Referral and Assessment.....	40
Implementation.....	44
Staff Development.....	49
Review and Evaluation.....	49
Accounting.....	50
Staff Comments.....	50
Chapter 2 -- Part 2 Individual School Descriptions	52
Alvarado Elementary.....	53
Buckeye Elementary.....	56
Gold Oak Elementary.....	58

Mammoth Elementary.....	61
O'Neill Elementary.....	63
Reeds Creek Elementary.....	65
Wellwood/Palm Elementary.....	67
Wilson Elementary.....	69
El Rancho Verde High School.....	71
James Logan High School.....	73
Mammoth High School.....	75
Chapter 3 -- Conclusions and Recommendations	77
Appendix I	80
Appendix II	82

POLICY ANALYSIS FOR CALIFORNIA EDUCATION

Policy Analysis for California Education, PACE, is a university-based research center focusing on issues of state educational policy and practice. PACE is located in the Schools of Education at the University of California, Berkeley and Stanford University. It is funded by the William and Flora Hewlett Foundation and directed jointly by James W. Guthrie and Michael W. Kirst. PACE has expanded to include satellite centers in Sacramento and Southern California. These are directed by Gerald C. Hayward (Sacramento) and Allan R. Odden (University of Southern California).

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Foreword

by Peter M. Birdsall

The following two papers focus on the major reforms in the comprehensive school finance legislation of 1981, AB 777 (L. Greene). Generally, these reforms represented the Legislature's response to school district requests for increased local flexibility in the administration of California public schools. However, as the papers indicate, the two major reforms are very different in nature.

David Pacheco's paper focuses on the waiver authority established by AB 777. In many ways, the waiver authority represents a profound change in the governance of California's schools. It represents the Legislature's delegation to a board of non-elected persons (State Board of Education members are appointed by the Governor) the ability to waive a broad array of Education Code sections.* Yet the waiver authority created little controversy or concern at the time it passed.

One reason for the lack of controversy was that the Legislature consciously excluded numerous "key" sections of the Education Code from the waiver authority. Notably, these exclusions included state provisions concerning state funding of schools, lay-off and discipline procedures for certificated employees, and most of the controversial categorical education programs.

The second paper, published originally by Public Policy Research, focuses on the AB 777 reform intended to provide more flexibility with regard to several of the major categorical education programs. (This reform was enacted in a part of AB 777 called the School-Based Program Coordination Act.) In contrast to the waiver authority, these reform provisions in AB 777 were very controversial and were the subject of a major floor fight before the bill passed the State Assembly for the final time. The basic concern raised by opponents of this provision was that it effectively allowed funds intended for special needs to be used for other purposes, with the result that those special needs would not be addressed.

Since the passage of AB 777, however, legislative interest has concentrated much more on the waiver process than on the categorical flexibility provisions. Indeed, since AB 777 was passed, there has been at least one bill every year directly affecting the waiver process. In contrast, since the enactment of AB 777 and the immediately following technical clean-up measure, SB 968, only one bill, SB 813 (1983), has revised the School-Based Program Coordination Act.

The first waivers approved by the State Board of Education in large numbers concerned driver training. These waivers allowed districts to operate "competency-based" driver training programs, in which pupils were only retained in the program until they mastered the required competencies. State law at that time prescribed specific hours of instruction for all program participants. School district officials found that by using a competency-based program they could reduce the average number of pupil hours in the program and thus hold costs closer to the level of state funding.

* Editors Note: While the Legislature's delegation of authority to the State Board of Education is clear, it is also conditional, since the waivers must first be supported by a local or county board of education which is elected.

The first bill on the waiver process was SB 1703 (Montoya), which sought to limit the number of such waivers to ten. As noted in David Pacheco's paper, the actual number of such waivers approved by the State Board of Education in 1982 was 224. SB 1703 failed passage in its first committee, the Senate Education Committee.

The issue of competency-based driver training waivers also became the topic of a court suit, along with five suits that were filed concerning waivers that were approved regarding force account sections of the Education Code. (The "force account" provisions established the circumstances under which a school district had to open a project for competitive bid, rather than use district staff.)

All these suits argued that the waiver provisions of AB 777 represented an unconstitutional delegation of power by the Legislature. In addition, the major suit on force accounts argued that derogation of the statutory principle of reliance on the private sector for the construction of public works should not be permitted without clear legislative authority.

The issues concerning force accounts were resolved when AB 1301 (Harris) was signed into law in 1982. That bill moved the force account sections into the Public Contract Code. In doing so, it removed the sections from the waiver authority, which extends only to the Education Code.

In March 1983, the courts dismissed the case regarding driver training, determining that the Legislature had established the waiver authority and that it was responsible for determining any changes that should be made in that authority.

Also in 1982, the Legislature enacted SB 968 (Sieroty). This was the bill in which both the waiver authority and school-based coordinated programs had originally been proposed. After the contents of SB 968 were effectively placed in AB 777, SB 968 became a "trailer" bill to correct technical errors and unanticipated problems that occurred because of the language enacted in AB 777. In addition to numerous technical provisions, SB 968 further limited the waiver authority by prohibiting State Board of Education waivers concerning the State Teachers Retirement System.

The following year, 1983, the action began again. SB 624 (L. Greene) was enacted, which prohibited waivers of certain Education Code sections concerning school facilities. Senator Leroy Greene argued that the sections protected by his bill were already subject to waiver by the State Allocations Board, and that discretion on those issues should continue to rest with that board rather than the State Board of Education.

Senator Montoya again tried to restrict waivers concerning competency-based driver training, but his bill, SB 416, failed passage in the Senate Education Committee.

Senator Torres established a new direction of enacting legislation to reflect policies that were emerging through the waiver process. His SB 1155, which was enacted in 1983, allowed school districts or county offices of education to observe Veterans Day on the Monday or Friday of the week in which the holiday occurred, without having to seek a waiver from the State Board of Education. Another bill that year, SB 70 (Hughes), clarified that county offices of education could obtain waivers under AB 777 provisions.

Finally, in 1984, legislation was enacted which authorized school districts to offer competency-based driver training programs without having to obtain a waiver from the State Board of Education. The bill was SB 1379 by Senator Alquist.

This year the legislative efforts continue. SB 57 (Hart) has been enacted to provide even greater flexibility in scheduling holidays, so as to reduce the need for districts to use the waiver process. SB 57 also calls for a study of the Education Code in order to identify changes that might relieve districts and county offices of education of the need to seek waivers of laws that are inconsistent or unnecessary.

A bill still under consideration this year is AB 1978 (Naylor). As introduced, AB 1978 would have prohibited the waiver of certain sections of the Education Code concerning the sale or lease of surplus school property. As it has now been amended, it would require instead that local cities and counties be notified of such a waiver request and have an opportunity to comment on the request.

This approach of changing the process itself has already had some legislative success. In 1983, SB 719 (Dills) was enacted to require that each waiver request include a certification as to whether the waiver had been developed with the participation of the collective bargaining unit for employees and contain a statement describing the position of the bargaining unit.

In contrast to this relatively rich legislative history on the waiver process, little interest has been shown in the School-Based Program Coordination Act. The only significant change was in SB 813, the major school finance and reform legislation of 1983. In that bill there was a provision intended to make it easier for schools receiving Economic Impact Aid funds (state funding for programs for educationally disadvantaged and limited-English proficient students) to participate in School-Based Coordination.

The major source of change with regard to the School-Based Program Coordination Act has been the State Department of Education (SDE). In the first year, there was very little information available from SDE concerning this program. By 1984-85, however, the Department had included highlighted information about the program in its school planning materials.

Perhaps more significantly, the Department has begun to implement the concepts of School-Based Coordinated Programs (SBCP). Specifically, in 1984-85 the Department began implementing a consolidated compliance review process under which the variety of categorical programs at a school site are reviewed at the same time and by the same team. In addition, throughout the Department's quality review criteria there is an increasing emphasis both on the coordination of categorical programs with the regular program and on coordination of categorical programs with each other.

At the local level, the general impression is that implementation of the School-Based Program Coordination Act continues to expand, but at a fairly slow rate. Unfortunately, state data on this question provides little useful information.

The report by Public Policy Research indicates that in 1982-83, 950 schools reported that they were participating in school-based coordination. However, the report also notes that schools only had to check a single box on the front page of the application in order to be recorded as operating under SBCP, and that a large number of schools appeared to have checked this box in error.

For 1984-85, the number of schools reporting that they are operating school-based coordinated programs dropped dramatically to 512. It appears, however, that the problem of schools making this designation in error has been largely corrected.

Interestingly, the number of schools reporting the inclusion of special education in their school-based program has increased from 1982-83 to 1984-85. The Public Policy Research report cites 56 schools as reporting the inclusion of special education in SBCP. By 1984-85 this number increased to 116.

Further, in 1982-83 only one relatively large school district had implemented School-Based Coordinated Programs at all of its school sites. By 1984-85 this number had increased to seven relatively large districts that have included all or a large portion of their schools in the program.

In summary, both the major reforms of AB 777 appear to be alive and active. The arenas of interest concerning the two approaches are very different. Several waiver issues continue to be the topics of legislation, while implementation of the School-Based Program Coordination Act has been reflected more in the actions of the State Department of Education, local school districts, and county offices of education.

It is hoped that the following two papers will increase the general awareness of these two important reforms and of the issues that continue to be central to both these reform efforts.

*The Waiver Process for California's
Education Code*

by David R. Pacheco

**Policy Analysis for California Education (PACE)
November 1985**

CONTENTS

Executive Summary	3
Introduction	5
Background	5
Criteria for Denying Waiver Requests	5
Local Dissent and SBE Decisions	6
Program (Versus Administration) Waiver Requests Still Rare	6
Questions and Recommendations	8
Appendix A: Waiver Request	9
Appendix B: 1982 Waiver Actions by Education Code Section	11
Appendix C: General Waiver Authority of the State Board of Education	12
Appendix D: Summary of Non-Waivable Education Code Sections Under the General Waiver Authority of Education Code Sections 33050-53	13

EXECUTIVE SUMMARY

Enacted in 1981 as part of AB 777, the waiver authority provides school districts relief from the prescriptive nature of California's voluminous Education Code. If a particular law or regulation conflicts with a local situation, school districts may seek alternatives by requesting a waiver of state requirements, subject to local and state review (State Board of Education).

Each school district must justify the need for a waiver. However, waivers are automatically approved unless the State Board of Education finds grounds for denial. "Not meeting student needs," "jeopardizing parental involvement," and "increasing state costs" are common reasons for denial. During 1982, more than 90 percent of waiver requests were approved. Most are in non-controversial areas like driver training and school holidays. The State Board of Education seldom, if ever, approves a waiver request over the objections of a group at the local level. This may discourage local boards from seeking controversial waivers.

By mid-1984, the number of waiver requests reached 200 per month. Yet the bulk of these requests were in the areas of business and administration. Program waivers are still rare, despite the initial clamor about needed flexibility. Why so few? Several explanations are possible.

First, few districts may be aware of the process. Second, school districts may view the application process as cumbersome and time-consuming. Third, program flexibility problems may be addressed at the local level. Fourth, school districts may be using existing, though sub-optimal, local procedures to coordinate categorical programs.

Has needed flexibility been gained by the waiver authority, or are problems simply not surfacing at the state level? One observer noted that school site personnel are often unclear about the source of their major problems. Often the state was blamed for regulations that emanated from federal or local authorities. Clearly, there is more potential in the use of waivers by local educational agencies than the state has seen thus far. Case studies of involvement by mandated advisory groups would be helpful in displaying the management of programmatic difficulties at the school district level.

Recommendation: Oversight hearings by SBE, the legislature, or both are recommended to explore how the full potential of the waiver process can be realized.

INTRODUCTION

Enacted in 1981, the waiver authority (within AB 777, Chapter 100, Statutes of 1981) has encountered little debate, despite its potentially dramatic impact on school governance in California. At the time AB 777 was under consideration, cries for greater flexibility were frequently heard from local educational agencies (LEAs). The Legislature responded by establishing a waiver authority for most sections of the Education Code. Waivers are granted by the State Board of Education (SBE).

Today, the waiver process continues without much clamor about either the waiver authority or the need for greater flexibility. This report examines the waiver authority and addresses reasons for the relative lack of controversy and the unexpected low usage of waivers by LEAs.

BACKGROUND

The purpose of the waiver authority is to provide school districts relief from the prescriptive nature of California's voluminous Education Code. If a particular law or regulation does not apply to a local situation, school districts may seek alternatives by requesting a waiver of the state requirements, subject to local and state review. The intent of the Legislature was to allow districts with unique circumstances to request waivers of Education Code sections that conflict with their particular needs. This provides school districts an alternative *without* the Legislature repealing an entire section of the law.

In its request to the State Board of Education, each school district must justify the special need for a waiver. However, the burden of proof rests with SBE: each waiver must be approved unless a specific reason for denial can be found. Once a completed waiver request has been submitted to the State Department of Education, SBE must act on the application within two of its regularly scheduled meetings or the waiver automatically becomes effective for one year.

During 1982, more than 90 percent of the waiver requests submitted to the State Board of Education were approved. Most of the waivers were in non-controversial areas like driver training and school holidays. The identification and assessment criteria relating to any categorical program are exempt from the waiver authority.

CRITERIA FOR DENYING WAIVER REQUESTS

The State Board of Education is required to approve waiver requests *unless* it finds that:

- The educational needs of pupils are not adequately addressed
- A school site council did not approve the request for the waiver
- The appropriate advisory committee did not have an adequate opportunity to review the waiver request
- Pupil and teacher protection is jeopardized
- Parental involvement is jeopardized

- The waiver request would substantially increase state costs
- A collective bargaining agreement is affected and the employee representative does not agree

The criterion of "not meeting the needs of students" is the most frequently used by SBE in denying waiver requests. Likewise, "jeopardizing parental involvement" or "increasing state costs" are common reasons for denying requests. In fact, in almost every program waiver denied in 1982, pupil needs or increased costs were cited as reasons for denial.

LOCAL DISSENT AND SBE DECISIONS

There is no data available showing the number of waiver requests that are disputed and held at the local board level. In cases where there is local dissent against a proposed waiver by an advisory council or an exclusive representative, it must be stated in the waiver request submitted to the State Board of Education. In the past, SBE has taken such dissent very seriously and has seldom, if ever, approved a waiver request over the objections of a group at the local board level. This may have a "chilling effect" on local boards seeking controversial waivers or ones that are not routine.

PROGRAM (VERSUS ADMINISTRATION) WAIVER REQUESTS STILL RARE

At the time of AB 777's passage, the consensus was that if school districts used the waiver authority for their own ends successfully, the idea would spread rapidly. This appears to be true. The number of waiver requests increased from just four in February 1982, to more than 200 per month by mid-1984. However, the bulk of these requests remain in business and administration areas (including CBEST waivers as administration rather than program). Program waiver requests are still rare, despite the initial clamor about needed flexibility. Why so few? Several alternative explanations have been advanced during the course of this research.

First, given the limited amount of time waivers have existed, few districts are aware of the process. Of those that are aware, their waiver requests perhaps have been limited to what they see as obtainable. More controversial waivers may be forthcoming as districts develop strategies and techniques for promoting them. This notion of self-constraint holds true only if flexibility problems still exist in program areas and school districts are holding the more difficult waivers.

Second, although the application procedure for applying for a waiver is fairly simple (see Appendix A), school districts may see the process as cumbersome and time consuming. State Department of Education staff recognized this as a potential problem and initiated a series of regional workshops on the waiver process. The workshops and accompanying waiver handbook were scheduled for late 1984. One should watch carefully whether waiver requests increase after these workshops. Observers reported that several county councils still are not aware of the flexibility in the waivers, and they continue to operate on the basis of the more restrictive Education Code.

Indeed, lack of information may be the key to the absence of program waivers. In April 1984, a letter was prepared by State Department of Education staff and sent to all

LEAs in California. The letter described the waiver authority and process and, more importantly, what can and cannot be waived in the Education Code. The dissemination of the SDE letter has resulted in the current flow of more than 200 waiver requests per month. However, the majority of these requests remain in areas such as school holidays, CBEST administration, and credentialing requirements.

Most Frequent Waiver Areas: Requests to State Board of Education

1982

- 254 - School Holidays: to hold Veteran's Day on Friday
- 224 - Driver Training: competency based programs
- 36 - Free/Reduced Price Meals: discontinue for summer
- 19 - Driver Education: credential requirements
- 13 - ADA Calculation: weekend truancy classes

1983

- 284 - School Holidays
- 80 - Summer School
- 64 - Sale of Property/Bidding Process
- 34 - Driver Training

SOURCE: State Department of Education Report to Governor;
Senate Education Committee.

Third, program flexibility problems may be diminishing at the local level, so there is no unmet need. The waiver authority was included within AB 777 as part of a response to claims that restrictive regulations, especially for categorical programs, were inefficient and duplicative. Within the School-Based Program Coordination Act, (also established in AB 777) one or any combination of 11 designated categorical programs can be consolidated, and staff and materials may be used to serve student populations not normally eligible for categorical funds. This was initiated in direct response to categoricals overlapping each other *and* the move to mainstream "special need" students with "regular" students. Under the Act, a school-site council (half parents, half staff) must develop a site plan describing how coordinated resources will be used at the school. Has this mechanism provided the flexibility originally called for?

A fourth possibility is that school districts operate on the basis of standard operating procedures. Unless a problem becomes enormous, it is easier for an organization to cope

with it in a manner that has been available for years. Consequently, sub-optimal local procedures with categorical programs are left alone. Few people at the LEA level, except for district and consolidated program managers, are even aware of the flexibility allowed under the School-Based Coordinated Program Act.

QUESTIONS AND RECOMMENDATIONS

Assuming a local school board wants a program waiver, there is little chance of it being approved by the State Board of Education if there is dissent from the appropriate local advisory council. Case studies of involvement by mandated advisory groups would be helpful in displaying the management of programmatic difficulties at the school district level. Regarding those program waivers that do go before SBE, are advisory councils actually reviewing the requests, or are the advisory chairs merely signing off on behalf of the local board? Are union representatives being consulted regarding waivers that require changes in personnel? LEAs may view this entire process as more trouble than it is worth.

The waiver process is operating almost exclusively in the non-program, non-controversial areas. Have the needs of school districts for more flexibility been rectified with the passage of AB 777, or are the problems simply not surfacing at the state level? Bill Whiteneck, chief consultant of the Senate Education Committee, found mass confusion among local school site personnel regarding the origin of their major problems. Often the state was blamed for regulations that emanated from federal or local authorities. Clearly, there is more in the potential use of waivers by LEAs than the state has seen so far.

Recommendation: *Oversight hearings are recommended to explore how the full potential of the waiver process can be realized.* These hearings could be conducted by the State Board of Education, the Legislature, or both bodies. The hearings could explore the various causes for the limited use of waivers that have been discussed in this report.

APPENDIX A

California State Board of Education
Form SBEW-2 (Rev. 4-84)

Waiver Request

Pursuant to Education Code Sections
33050, 33051, 33052, 33053

Mail original and two copies to:

California State Department of Education
Consolidated Programs & Grants Management Unit
721 Capitol Mall, 2nd Floor
Sacramento, CA 95814
Telephone (916) 322-5207

County/district code					
District					
Date of request					
District contact person					
Telephone					
Time covered by request					
From		To			
Note: The waiver is effective the day the State Board acts on it and is effective for a maximum of two years.					

Request is for waiver of Education Code Section(s)

Text of section(s) to be waived (If lengthy, attach a photocopy.)

Description of what will be done if waiver is granted (Continue on reverse side.)

Date stamp	FOR STATE DEPARTMENT OF EDUCATION USE ONLY						
	Waiver number _____						
	Date referred for analysis ____ / ____ / ____						
	Referred to _____						
	Recommendation to be returned by ____ / ____ / ____						
	Staff recommendation	<input type="checkbox"/> Approve	<input type="checkbox"/> No action	<input type="checkbox"/> Inappropriate			
	Deny	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6 <input type="checkbox"/> 7
	Scheduled for SBE ____ / ____ / ____ .						

Description of what will be done if waiver is granted (continued)

Statement in response to certification 3(c) below, if applicable. (If lengthy, attach another sheet.)

SUPERINTENDENT'S CERTIFICATION

I certify the following answers to be correct:

- | | <u>Yes</u> | <u>No</u> |
|---|--------------------------|--------------------------|
| 1. (a) Does the waiver affect a program which requires the existence of a school site council? | <input type="checkbox"/> | <input type="checkbox"/> |
| (b) If the answer to (a) is yes, did the school site council approve the waiver? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. (a) Is there a council or advisory committee, other than a school site council and including a bilingual advisory committee, appropriate to this waiver? | <input type="checkbox"/> | <input type="checkbox"/> |
| (b) If the answer to (a) is yes, did that council or committee have an adequate opportunity to review the waiver request? | <input type="checkbox"/> | <input type="checkbox"/> |
| (c) If the answer to (b) is yes, is there a written summary of any objection raised by the council or committee? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. (a) Is there one or more appropriate exclusive representative of employees as provided in Chapter 10.7 (commencing with Section 3540) of Division 4 of Title 1 of the Government Code? | <input type="checkbox"/> | <input type="checkbox"/> |
| (b) If the answer to (a) is yes, did those representatives participate in the development of the waiver request? | <input type="checkbox"/> | <input type="checkbox"/> |
| (c) If the answer to (b) is yes, did the representative provide a statement of his or her position regarding this waiver? If yes, the position is stated above. | <input type="checkbox"/> | <input type="checkbox"/> |
| (d) If the answer to (b) is no, were these representatives given the opportunity to participate prior to the public hearing? | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Did the governing board of your district hold a public hearing on the proposed waiver request prior to this filing? | <input type="checkbox"/> | <input type="checkbox"/> |

Signature of district superintendent

Date

1982 WAIVER ACTIONS BY EDUCATION CODE SECTION

CODE	SUBJECT	APPROVE	DENY	NOACTION
		0	0	0
100.	WITHDRAWN/REPEATS #515	0	0	0
111.	PHYSICAL PERFORMANCE TEST	1	0	0
111.	SPECIAL ELECTION	2	0	0
113.	SCHOOL DISTRICT REORGANIZATION	1	0	0
119.	CHILD DEVELOPMENT ACT: TAX LEVY	1	0	0
119(C).	ADOPTED COURSE OF STUDY	1	0	0
122.	REPAYMENT OF FUNDS ADVANCED TO DISTRICT	0	1	0
119.	TEACHER RETIREMENT	0	1	0
121.	VOLUNTEER AIDES	1	0	0
127.	SMALL DISTRICT DEPUTY	0	0	0
172(E).	GOVERNING BOARD SUBSCRIPTION	2	0	0
233.	BOARD MEMBER AS EMPLOYEE	1	0	0
234.	EFFECTIVE DATE FOR ACTION	1	0	0
220.5(A).	SCHOOL DISTRICT REORGANIZATION	1	0	0
140.	KINDERGARTENS	1	0	0
220(A).	SCHOOL HOLIDAY	254	1	0
228.	ADA CALCULATION/WEEKEND CLASSES	13	0	0
252.	SUMMER SCHOOL PROG	0	0	0
120.	YEAR-AROUND PROGRAMS	0	0	0
115.	PROPERTY NOT USED AS SCHOOL SITE (SENT TO ALLOCATION	0	0	0
140.	LEASE-PURCHASE	0	0	0
227.	USE OF UNSAFE BUILDINGS	0	1	0
331.	39332. LEASING OF EQUIPMENT	1	0	0
360(FF).	LEASE OF PROPERTY	6	2	0
363.5.	SALE OR LEASE OF PROPERTY	4	1	0
366.	SALE OR LEASE OF PROPERTY	1	0	0
384.	SALE OR LEASE OF PROPERTY	0	1	0
394.	SALE OR LEASE OF PROPERTY	1	0	0
320.	SELL DISTRICT PERSONAL PROPERTY	0	0	0
140.	CONTRACTS	1	0	0
349.	FORCE ACCOUNT LABOR	9	0	0
307.5.	PAYMENT OF TRANSPORTATION COST	0	1	0
330(B).	SCHOOL BUS	0	0	0
302.	FOOD SERVICE POSITIONS	0	1	0
000.	PURCHASING	10	0	0
353.	USE OF SCHOOL PROPERTY	1	1	0
341.	ADJUSTIVE APPORTIONMENTS	0	0	0
372.	APPORTIONMENTS FOR THE PAYMENT OF SALARIES OF CLASSRO	1	0	0
375.	41376, 41378, CLASS SIZE	1	0	0
376.	CLASS SIZE PENALTY	4	5	0
378.	KINDERGARTEN CLASS SIZE	1	0	1
379(C).	CLASS SIZE	1	0	0
401-41405.	TEACHER/ADMINISTRATOR RATIO	0	0	0
402.	TEACHER/ADMINISTRATOR RATIO	3	2	0
420.	MINIMUM SCHOOL YEAR	0	0	0
500.	STATE SCHOOL FUND	0	0	0
405-41907.	DRIVER EDUCATION CREDENTIAL	0	0	1
406.	41907. DRIVER EDUCATION CREDENTIAL	0	0	11
407.	DRIVER EDUCATION CREDENTIAL	2	0	4
76.5(B)-37353-37252.	SUMMER PROGRAMS	2	0	0
439.	REVENUE LIMIT	0	1	0
251.	44254, 44830, EMERGENCY CREDENTIALS	0	0	1

1982 WAIVER ACTIONS BY EDUCATION CODE SECTION (cont'd)

ED.CODE	SUBJECT	APPROVE	DENY	NOACTION
44252(B), 44332, 44830(B),	TEACHER PROFICIENCY TEST	2	0	0
44263,	ASSIGNMENT TO A SINGLE CLASS SUBJECT	0	1	0
44265,	SPECIAL EDUCATION CREDENTIAL	0	0	0
44664,	PROBATIONARY PERSONNEL	1	0	0
44830,	PHYSICAL EDUCATION CREDENTIAL	1	0	1
44868,	LIBRARIAN CREDENTIAL	0	0	1
44918,	TEMPORARY EMPLOYEES	0	0	0
45025,	PART-TIME EMPLOYEES	1	0	0
45264,	PERSONNEL COMMISSION	1	0	0
45344.5-45361.5,	TEACHER AIDE PROFICIENCY	3	0	0
46111,	MAXIMUM KINDERGARTEN SCHOOL DAY	0	0	0
46112,	MINIMUM SCHOOL DAYS	0	0	0
46117,	MINIMUM SCHOOL DAY	0	0	0
46118(B),	SINGLE SESSION KINDERGARTEN CLASSES	0	0	0
6141,	MINIMUM SCHOOL DAY	0	0	0
18000,	MINIMUM AGE OF ADMISSION	0	1	0
48200,	COMPULSORY EDUCATION	0	0	0
48204,	INTERDISTRICT ATTENDANCE	0	1	0
48430,	CONTINUATION CLASSES	0	0	0
48432,	CONTINUATION HIGH SCHOOL	0	0	0
48434(A),	HOURS WHEN CLASSES ARE MAINTAINED	2	0	0
48436, 33031,	STANDARDS AND REGULATIONS FOR ORGANIZATION AND	1	0	0
49451,	SIGHT AND HEARING TESTING	1	0	0
49452,	SIGHT AND HEARING TESTING	4	1	0
49550,	FREE OR REDUCED PRICE MEALS	36	2	0
49950,	FREE OR REDUCED PRICE MEALS	1	0	0
51220, 51222, 51225, 51241,	PHYSICAL EDUCATION	0	1	0
51222,	PHYSICAL EDUCATION	0	0	0
51241(B)	PHYSICAL EDUCATION	1	0	0
51851, 51852,	DRIVER EDUCATION	2	0	0
51852,	DRIVER EDUCATION	222	0	0
2012,	SCHOOL SITE COUNCIL	0	0	0
2034(I),	DUTIES OF GOVERNING BOARD	0	0	0
2164.1,	LES PUPILS	0	0	0
2165(A)(1),	BILINGUAL EDUCATION	0	3	0
2167,	BILINGUAL EDUCATION	0	0	0
2176, 52111, 4423, 54425(A)-	ADVISORY COMMITTEES	0	0	0
2178,	WAIVERS(BI-LINGUAL TEACHER)	0	0	0
2201,	MENTALLY GIFTED MINOR PROGRAM	0	0	0
2301,	ROC/ROP	2	0	0
2501.5, 52515,	ADULT EDUCATION FUNDS	2	0	0
4123,	READING SPECIALIST	1	0	0
4146	READING SPECIALISTS	0	0	0
4167,	UTILIZATION OF ALLOWANCE (MILLER-UNION)	0	0	0
3030,	RESPONSIBLE LOCAL AGENCY	0	0	0
3362(A)(B)(C),	RESOURCE SPECIALISTS	0	0	1
0601(FF),	TESTING	0	1	0

GENERAL WAIVER AUTHORITY OF THE STATE BOARD OF EDUCATION
Education Code Sections 33050--33053

33050. (a) The governing board of a school district or a county board of education may, on a districtwide or countywide basis or on behalf of one or more of its schools or programs, after a public hearing on the matter, request the State Board of Education to waive all or part of any section of this code, except:

(1) The provisions of Article 1 (commencing with Section 15700) and Article 2 (commencing with Section 15780) of Chapter 6 of Part 10.

(2) The provisions of Chapter 8 (commencing with Section 16000) and Chapter 9 (commencing with Section 16400) of Part 10.

(3) The provisions of Chapter 22 (commencing with Section 17700), Chapter 23 (commencing with Section 17760), and Chapter 25 (commencing with Section 17785) of Part 10.

(4) The provisions of Part 13 (commencing with Section 22000).

(5) The following provisions of Part 23:

(A) Chapter 1 (commencing with Section 39000).

(B) Article 1 (commencing with Section 39100) to Article 6 (commencing with Section 39210), inclusive, of Chapter 2.

(C) Section 39248; Sections 39313 to 39325, inclusive; Section 39363; and Sections 39618 to 39621, inclusive.

(6) The provisions of Sections 52163, 52165, 52166, and 52178.

(7) The provisions of Article 3 (commencing with Section 52850) of Chapter 12 of Part 28.

(8) The identification and assessment criteria relating to any categorical aid program, including Sections 52164.1 and 52164.6.

(9) The provisions specified pursuant to Section 52033.

(b) Any waiver of provisions related to the programs identified in Section 52851 shall be granted only pursuant to the provisions of Article 3 (commencing with Section 52850) of Chapter 12 of Part 28.

(c) The waiver of an advisory committee required by law shall be granted only pursuant to the provisions of Article 4 (commencing with Section 52870) of Chapter 12 of Part 28.

(d) Any request for a waiver submitted by the governing board of a school district or a county board of education pursuant to subdivision (a) shall include a written statement as to (1) whether the exclusive representative of employees, if any, as provided in Chapter 10.7 (commencing with Section 3540) of Division 4 of Title 1 of the Government Code, participated in the development of the waiver and (2) the exclusive representative's position regarding the waiver.

33050.3. Notwithstanding Section 33050, the State Board of Education is authorized to waive the provisions of subdivision (a) of Section 46202 only during the 1983-84 fiscal year, and only if the State Board of Education finds that the district requesting the waiver demonstrates that it meets the following criteria:

(1) The district has experienced an unanticipated growth in number of pupils over the 1982-83 fiscal year.

(2) There exists an overcrowding of pupils with no reasonable alternative to house pupils without initiating the use of double sessions. Reasonable alternatives to house pupils shall include, but need not be limited to, the use of facilities in adjacent districts, the use of facilities of a county superintendent of schools, the use of facilities of other public agencies, the lease of portable facilities, or the expanded use of double sessions if the district already has double sessions in other schools prior to the increase in the number of pupils.

33051. (a) The State Board of Education shall approve any and all requests for waivers except in those cases where the board specifically finds any of the following:

(1) The educational needs of the pupils are not adequately addressed.

(2) The waiver affects a program which requires the existence of a school site council and the school site council did not approve the request.

(3) The appropriate councils or advisory committees, including bilingual advisory committees, did not have an adequate opportunity to review the request and the request did not include a written summary of any objections to the request by the councils or advisory committees.

(4) Pupil or school personnel protections are jeopardized.

(5) Guarantees of parental involvement are jeopardized.

(6) The request would substantially increase state costs.

(7) The exclusive representative of employees, if any, as provided in Chapter 10.7 (commencing with Section 3540) of Division 4 of Title 1 of the Government Code, was not a participant in the development of the waiver.

(b) A waiver shall be approved or renewed by the State Board of Education prior to its implementation for the period of time requested by the governing board of a district, but not to exceed two years.

33052. If formal action by the State Board of Education on a waiver request is not taken later than the second regular meeting of the board following receipt of a complete and documented waiver request by the State Department of Education, the waiver shall be deemed approved for one year, commencing the first day of the following month.

33052.5. For purposes of this article, "school district" shall include county offices of education.

33053. The State Department of Education shall annually submit a report to the Governor, Legislature, State Board of Education, and make the report available to the superintendent and board president of each school district and county office of education. This report shall include a description of the number and types of waivers requested of the board, the actions of the board on those requests, and sources of further information on existing or possible waivers.

SB 624
1983

AB 70
1983

SB 968
1982

AB 2089
1984

AB 70
1983

AB 70
1983

SB 968
1982

SUMMARY OF NONWAIVABLE EDUCATION CODE SECTIONS UNDER THE GENERAL
WAIVER AUTHORITY OF EDUCATION CODE SECTIONS 33050--53

8750- 8754	Grants for conservation education	3931J-3932S	Property: sale, lease, exchange
15700-15754	State School Building Aid Law of 1949	3936J	Use of funds for sale or lease with option to purchase
15780-15795	Aid for reorganized districts	39618-39621	Property maintenance and control
16000-16105	State School Building Aid Law of 1952	*41000-41360	State financial management and control, property valuations, state school funds, loans and advances
16150-16166	Aid for reorganized districts	*41420-41423	Apportionments
16190-16207	Aid for exceptional children	*41600-41866	Computation of allowances
17210-16215	Aid for compensatory education	*41920-42911	Instructional TV, miscellaneous allowances, financial statements of school districts, taxation, school district funds, reimbursements
16230-16235	Seasonal impaction aid	44520-44534	The New Careers in Education Program
16250-16253	Aid for RUC/ROP	44570-44671.4	Local staff development programs
16260-16272	Children's Center Construction Law of 1968	*44930-44988	Employment-certificated resignations, dismissals, and leaves of absence
16280-16284	Kern County ROC	*46000-46618	Attendance for computing apportionments (except 46202 is waivable under certain conditions in AB 70/83)
16300-16301	San Joaquin County RUC	*48900-49040	Pupil rights and responsibilities
16310-16344	Aid . . . structurally inadequate facilities	*49060-49078	Pupil records
16400-16414	State School Building Law of 1952	51870-51876	Classroom instructional television
17700-17708	State School Building Lease-Purchase Law of 1976	52000-52046	The School Improvement Program
17710-17738	Projects	52163	Bilingual education: Definitions
17740-17750	Allowances	52164.1	Census
17760-17764	Capital outlay revenue for state lands	52164.6	Reclassification criteria, process
17785-17795	Emergency School Classroom Law of 1979	52165	Required services: "Extra teacher," etc
22000-24944	State Teachers Retirement System	52166	Staffing, aides
39000-39018	School sites	52178	Waivers
39030-39032	Disposal of sites	52200-52241	The Gifted and Talented Pupil Program
39100-39102	Construction of school buildings: Department of Education	52340-52347	Regional Career Guidance Centers
39110-39124	Plans	52850-52863	School-Based Program Coord. Act, Art. 3
39140-39156	Approvals	54000-54061	Educationally Disadvantaged Youth Programs
39170-39173	Building schoolhouses	54100-54180	The Miller-Unruh Basic Reading Act of 1965
39190-39200	Factory built school buildings	56000-56885	Funding provisions of the Master Plan for Special Education
39210-39234	Fitness for occupancy		
39240	Application of Title 2, Div. 3, Part 23, Ch. 2, Art. 7		
39248	Site and safety regulations: relocatable structures		
39270	Joint projects and . . .		

*Sections specified as nonwaivable in Section 52033.

*Documentation of Model Programs for
Implementation of Assembly Bill 777
(School-Based Coordination Act)*

by Public Policy Research, Inc.

**Policy Analysis for California Education (PACE)
November 1985**

**Documentation of Model Programs for the Implementation
of Assembly Bill 777
(School-Based Program Coordination Act)**

Peter Birdsall, Project Director

Lories Tolbert, Project Consultant

Public Policy Research, Inc.

1983

This study was funded through Grant No. 34-03651-Y616-00-82 from the California State Department of Education. The findings and conclusions of the study are the sole responsibility of the investigators and do not imply the official position or endorsement of the California State Department of Education.

Forward

The investigators conducting this study wish to express our sincere thanks to the staff of each school and school district that participated in the study. Their openness, candor and hospitality were greatly appreciated. We also offer our thanks to the State Department of Education staff for their assistance throughout the course of this study. We hope that the information obtained will be useful both to local administrators and the State Department as they further refine the School-Based Program Coordination Act during the coming years.

Peter Birdsall, Project Director

Lories Tolbert, Project Consultant

Executive Summary

Background and Methodology

This study was conducted in order to document the programs operated by a sample of schools under the provisions of the School-Based Program Coordination Act. The purpose of the study was to provide information to local school and district administrators and state policymakers about the program and issues that had developed during the first year of implementation of the program.

In very general terms, the School-Based Program Coordination Act allows schools and school districts to coordinate one or more of eleven categorical programs at the school site level. "Coordination" in this context essentially means that the materials and staff funded by a certain categorical program may serve students not identified as eligible for that program. In order to participate under the Act, a school must establish a school site council composed one-half of parents and, if appropriate, students and one-half of staff members. The school site council in turn develops a school site plan which describes how the coordinated resources will be used at the school. With regard to special education, the School-Based Program Coordination Act allows resource specialists and designated instruction and services personnel to serve students who are not identified as requiring special education, and it allows special education students to be served entirely by staff who are not funded by special education so long as their programs are under direction of special education personnel and all services specified in the individualized education program are provided.

Statewide, 950 schools reported that they participated in school-based program coordination in 1982-83 (the first full year of implementation of the Act). Of these 950 schools, however, only 56 reported that they chose to include special education in their coordinated programs.

In selecting a sample for the study, it was discovered that ten of these schools had reported their participation in error. Thus the actual number of schools that coordinated special education was 46 schools. Of these 46 schools, twelve were included in the study for the purpose of conducting both reviews of their written school plans and visits to the school sites.

Most schools were visited twice during the year: once in the fall to determine the intended program at the school, and once in the spring to learn of the actual experiences of the school in implementing the program. Exceptions to this general process are described in the Chapter on "Method of Study".

Findings

Primary findings of the study were as follows:

1. There was a relatively low level of awareness of the degree of flexibility allowed under the School-Based Program Coordination Act. The understanding of the law was greater among district staff and consolidated program managers (e.g., school improvement and compensatory education staff) than it was among special education staff.

2. The school plans and the deliberations of the school site councils did not generally include significant reference to special education. The attention of those activities continued to focus primarily on the consolidated application programs that had previously been included in school plans.

3. Most of the schools in the study had implemented the concept of a child study team-- a team of resource people who reviewed the progress and appropriateness of services for any pupil in the school who was referred to the team. In those schools that did not have a formal team, informal staff relationships accomplished the same objective.

Composition and operating procedures of the teams varied from school to school. Staff opinions about the process were consistently positive at all the schools.

4. Special education due process protections were retained in all the schools. The general criteria used to determine whether a pupil should go through the child study team process or a formal IEP team meeting were the severity of the disability and the need for a formal assessment. If a formal assessment was needed, the pupil was referred through the special education procedures.

5. There were substantial variations in the use of resource specialists by schools participating under the School-Based Program Coordination Act. In several schools the resource specialists had assumed new duties and were serving major roles in the school-wide program of the school. There were not significant changes in roles for designated instruction and services personnel.

Recommendations

It is recommended that local schools and school districts increase their efforts to insure that they are aware of the provisions of the School-Based Program Coordination Act if they choose to operate under the program and that they seek to address in their school plans all the programs that they coordinate under the Act.

It is also recommended that local schools considering implementation of a coordinated school program review the advantages and disadvantages of a referral/service model such as the child study team.

It is recommended that the State Department of Education increase its efforts to inform local special education staff of the School-Based Program Coordination Act. It appears that the relatively greater awareness of consolidated application staff reflects the communication of information about the Act through the Department's consolidated application system.

It is recommended that the State Department strengthen its instructions for school planning to insure that programs coordinated under the School-Based Program Coordination Act are described in the school plan.

It is recommended that the state review its policies with regard to several special education issues concerning coordinated programs, including the issue of whether existing caseload provisions should apply to resource specialists in coordinated programs.

It is recommended that the State Department of Education develop a policy on the method of calculating funds under the control of the school plan for the purposes of allowing economic impact aid (compensatory education) funds to be included in a coordinated program.

It is recommended that the State Department of Education provide technical assistance and staff development on the child study team concept.

It is recommended that the State Department revise its accounting procedures to facilitate reduced paperwork for coordinated school programs.

It is recommended that the State Department of Education assign staff or initiate a study to consider alternative models of delivering categorical programs to small schools.

TABLE OF CONTENTS

	<u>Page</u>
Forward	1
Executive Summary	11
Introduction	1
Chapter 1 -- Method of Study	3
Chapter 2 -- Part 1 General Findings	7
Participation in School-Based Coordinated Programs	7
Decision to Implement	7
School Plans	9
Identification, Referral and Assessment	10
Implementation	14
Staff Development	19
Review and Evaluation	19
Accounting	20
Staff Comments	20
Chapter 2 -- Part 2 Individual School Descriptions	22
Alvarado Elementary	23
Buckeye Elementary	26
Gold Oak Elementary	28
Mammoth Elementary	31
O'Neill Elementary	33
Reeds Creek Elementary	35
Wellwood/Palm Elementary	37
Wilson Elementary	39
El Rancho Verde High School	41
James Logan High School	43
Mammoth High School	45
Chapter 3 -- Conclusions and Recommendations	47
Appendix I	50
Appendix II	52

Introduction

The School-Based Program Coordination Act was enacted as part of AB 777 in 1981. The Act was adopted in response to three important themes in education policy: (1) the desire to provide greater local flexibility in program management; (2) the emerging research to suggest that numerous categorical programs can be disruptive unless effectively coordinated, and (3) the continuing emphasis on the integration of individuals with exceptional needs with "regular" pupils and, by inference, the increased integration of special education and regular education program plans.

The School-Based Program Coordination Act was adopted as an alternative to the simpler "block grant" concept and was designed to achieve desired flexibility while retaining important pupil, staff, and parent protections. The technique used to address this objective was to maintain existing controls on the allocation of categorical resources to the school level, but to provide greatly increased flexibility at the school. As a generalization, inclusion of a program in the School-Based Program Coordination Act meant that staff or materials funded from a specific state-funded categorical program could now be used to serve any pupils in the school, regardless of whether they met the eligibility criteria for that particular program.

The law requires that a school implementing a program under the School-Based Program Coordination Act must have a school site council which is composed one-half of school staff and one-half of parents and, where appropriate, students. The school site council must, in turn, develop a school site plan which describes how the resources at the school will be used to insure that the needs of all pupils at the school will be addressed.

The School-Based Program Coordination Act further provides that a school may include any one or more of eleven categorical programs in its coordinated school program. The eleven programs are: School Improvement, Economic Impact Aid, Miller-Unruh, Gifted and Talented, Special Education, Conservation Education, School Site Staff Development, Educational Technology, Career Guidance Centers, New Careers, and Cadet Corps. Thus a school could decide to include some, but not all, of its categorical programs in the coordinated program.

With regard to special education, the law specifically requires that if a school includes special education in its coordinated program, the school must comply with all requirements of special education law and regulations: "except that: (1) resource specialist program services and designated instruction and services may be provided to pupils who have not been identified as individuals with exceptional needs; (2) programs for individuals with exceptional needs shall be under the direction of special education personnel, but services may be provided entirely by personnel not funded by special education monies, provided that all services specified in the individualized education program are received by the pupil."

The purpose of this study was to report on the kinds of programs that are being operated in schools that have chosen to include special education within their school-based coordinated program. It is hoped that this information will be useful to other schools and school districts that consider implementing programs under the School-Based Program Coordination Act, and to the State Department of Education in determining what technical assistance it should provide and what changes, if any, in state law or regulation are appropriate.

Chapter 1. Method of Study

The plan for conducting this study generally consisted of five parts: sample selection; written plan review; a site visit in the fall to each site included in the sample; a site visit in the spring to each site; and the analysis of the data and writing of the report. The decision to make two visits to each site was made because 1982-83 was the first full year of implementation of the School-Based Program Coordination Act. It was anticipated that useful insights could be gained by determining what the intentions of the school were in the fall visit and learning of their actual experiences through the spring visit.

Sample Selection

Sample selection for the project proved to be unexpectedly difficult due to the small number of schools participating in the program and some confusion on the part of schools in filling out the forms they submitted to the State Department of Education.

A total of 56 schools were identified by the State Department of Education as having indicated they were including special education within the School-Based Program Coordination Act under the provisions of AB 777. Of those 56 schools, eleven were in one school district (New Haven Unified) and fourteen were in one consortium (Tehama County Consortium). Thus there were only 31 schools identified for the entire state, exclusive of New Haven Unified and Tehama County. None of the identified schools were in any of the twenty largest school districts in California.

One problem was that a number of the schools were not in fact participating in the program. They apparently had checked certain boxes on the Consolidated Application in error, and thus had been included on the Department's list of participating schools. Efforts to select a sample resulted in finding that ten of the 31 schools outside New Haven and Tehama were listed in error.

The selection of the sample was made on the basis of the following variables:

1. Grade level-- The population of schools (based on 46 schools, the 56 less the ten known to be listed in error) included:

<u>Grades</u>	<u>Number of Schools</u>
9-12	2
7-12	1
5- 8	3
K- 8	21
K- 6	8
K- 5	4
K- 4	6
K- 3	<u>1</u>
	46

2. Geographic Setting (Urban, Suburban, or Rural and North, South, Valley or Mountains). The population of 46 schools included:

	<u>Urban</u>	<u>Suburban</u>	<u>Rural</u>
North	11	--	22
South	--	3	2
Valley	--	--	1
Mountain	--	--	7

3. Type of District-- Twenty-one of the 46 schools were in one-school districts. Eleven of the remaining 25 schools were in New Haven Unified.

4. Types of Programs Operated-- By definition, all of the schools were including special education in their school-based coordinated program (if a school didn't include special education, it was not part of the population being considered). Forty of the 46 schools included school improvement in their school-based coordinated programs.

Fifteen of the schools included the gifted and talented program in their school-based coordinated program, 25 included economic impact aid, nine included Miller-Unruh, eight included AB 551 staff development funds (all eight schools are in Tehama County), and two schools included one of the other allowable programs.

Based on these variables, a sample of twelve schools was selected. For additional detail on the selection of the specific schools, see Appendix I.

Written Plan Review

The process of written plan review was included in the study for two reasons: (1) to identify the degree to which changes in the school plan reflected the decision of the school to implement a school-based coordinated program, with specific emphasis on any inclusion of special education needs or services in the school plan, and; (2) to prepare the study team members for their site visits by providing them with an understanding of the program the school said it was operating. As is indicated in the section on "Findings", there was little evidence of change in the written school plans and few references to special education. The plan readings were still valuable, however, as preparation for the site visits.

As a result of these developments, the time commitments for the study team were partially shifted from written plan reviews to revising the site visit protocols to reflect the experience of the first visits and the increased emphasis on the site visits for gathering information.

Fall Visits

The emphasis of the fall visit was on the school's decision to implement a program under the School-Based Program Coordination Act, the planning for implementation, and the intended outcomes. During the spring visits a greater emphasis was placed on the school's experiences under the program and intended modifications for 1983-84.

The experiences of the first visits clearly demonstrated that the information to be gathered for the study would be obtained primarily through interviews, rather than classroom observation or the review of written records. The realization of the importance of the interviews resulted in a substantial revision and expansion of the "Protocol for Conducting Interviews". This protocol is reproduced as Appendix II to this study.

The interviews were conducted in both formal and informal settings. At each school the visit began with a formal meeting with the principal and key staff members identified by the principal. Subsequently throughout the day, discussions were held both in the presence and the absence of the principal and any other administrative personnel. At each school: (1) every categorically funded certificated staff member was interviewed; (2) at least some of the instructional aides were interviewed; (3) at least one-third of the regular classroom teachers were interviewed, with most of these teachers interviewed individually in informal situations and most of the teachers selected by the study team member; and (4) school site council members were interviewed at each school.

The interviews were not tightly structured, but each study team member used the protocol to insure that all issue areas were addressed and that the necessary cross-checks on information and perceptions were obtained.

The "fall" visits were conducted in the fall of 1982 for only eight of the twelve schools included in the sample. The four exceptions were due in two cases to unavoidable changes in the original sample (see section on sample selection) which resulted in delays in the timeline. One of these schools was visited early in 1983, and the other did not receive a "fall" visit. The other two exceptions were due to scheduling difficulties and illnesses of school staff which resulted in cancelling the scheduled visits and conducting the "fall" visits early in 1983.

Spring Visits.

The spring visits were conducted in much the same manner as the fall visits, except that the base of knowledge gained in the earlier visits allowed greater probing of areas that remained unclear from the fall visit. Also, the spring visits allowed the study team to check each school against the experiences from the visits to the other schools (such as the frequent reliance on a referral process such as a child study team, or the lack of involvement of regional or district special education staff in development of the school's program).

"Spring" visits were conducted for all but two of the sites in the sample. The fall visit to one of these schools indicated that it had not implemented the school-based coordinated program in 1982-83. Thus a spring visit to that school was not scheduled. The other school was very small (four certificated staff) and it was decided to make a follow-up visit to the county office that provided support to the school rather than another visit to the school site.

Analysis of Data and Writing the Report

The analysis and presentation of the information gathered through this study presented some unusual problems for two reasons: (1) the limited number of schools in the sample included an extraordinary variation in schools and resources, so that many possible groupings resulted in a sample of one for that type (for example, there was one large comprehensive high school, one small comprehensive high school, and one continuation high school); and (2) the information to be reported was not quantifiable in a meaningful manner.

The decision thus was made to report the information in two distinct ways. The first part of the "Findings" chapter proceeds roughly in order of the decision-making and implementation process, and attempts to highlight the general trends observed by the study team members. The second part of the chapter presents a separate description of each school included in the study. This approach was used so that the readers could gain a clearer understanding of the variations in the schools and their use of staff. The approach also provided eleven different examples of what a school-based coordinated program "looks like" when implemented.

The general findings were initially developed separately by each member of the study team. This method reduced the likelihood that a team member's list of findings would be biased by the other's comments, or that key observations would be omitted. Through a series of drafts and discussions these general findings were refined into statements which the study team members feel accurately reflect general comments about the School-Based Program Coordination Act and the schools included in this study.

Each individual school description was written by the study team member with primary responsibility for that specific school. (Each of the two study team members visited seven schools. Each member visited five schools individually and they visited two schools together. The joint visits were scheduled to help the two members insure that they were following the same procedures and asking similar questions.) The school description was then reviewed by the school principal and recommendations were offered for revision.

Chapter 2. Findings

This chapter on Findings is divided into two parts. Part I offers the general findings of the study-- findings which the study team believes are accurate for all or most of the schools included in the study. Part II provides a description of each of the schools in the sample that operated its programs under the provisions of the School-Based Program Coordination Act.

PART I GENERAL FINDINGS

Participation in School-Based Coordinated Programs

According to the State Department of Education, 950 schools operated under the School-Based Program Coordination Act in 1982-83. This represents approximately 13% of the more than 7,200 schools operating consolidated application programs that year.

Significantly, 771 of these 950 schools received school improvement program (SIP) funds, with these 771 schools representing over 22% of the SIP funded schools in the state. Yet of these 950 schools, only 56 reported that they had included special education in their school-based coordinated program.

Clearly, schools that had experience with the school improvement program showed the greatest willingness to implement under the School-Based Program Coordination Act. The number of schools that included special education in their coordinated program, however, was quite limited.

Decision to Implement

The study team found that the decision to implement was primarily initiated by staff outside of special education and outside of the school site. (One exception to this generalization was a school site where the initiative came from the principal, who was also the district special education director.)

It appeared that there were two primary reasons for the idea of implementing a school based coordinated program beginning outside of special education or the school site: (1) awareness of the new law is not widespread, and clearly is greatest at the district and county administration levels and among managers of consolidated application programs; (2) special education staff indicated that they continued to be preoccupied with implementing the new special education laws (for some it was only the second year of implementation under the Master Plan for Special Education, which has already been the subject of major legislative modifications in 1981 and 1982). Opinion was also expressed at some of the schools visited, however, that special education staff typically has less of an orientation to coordinating with the regular program and that the initiative to operate a coordinated program, therefore, came from people associated with the regular program.

Explanations given for initiating the decision to implement a school based coordinated program included:

(1) In most cases a major reason was to implement the school improvement program (SIP) schoolwide (for example, a K-8 school with a SIP grant for grades K-3 could now use those funds anywhere in the school);

(2) In some cases a major reason was the opportunity to implement a pre-conceived idea of how special education could be more effectively coordinated with the regular program;

(3) In other cases there was no strong pre-conceived idea of how to coordinate special education, but there was a feeling that it could be done more effectively. In this case the decision to include special education reflected an attitude something like "Let's check this box and see what we can figure out."

Although not a "reason" for implementing, it appeared that the existence of stable staff at the school was a factor in the decision. With the exception of New Haven Unified, which adopted school-based coordinated programs as district-wide policy, every school in the study had little staff turnover, particularly at the principal and certificated resource staff levels.

Involvement of the School Council

In each school visited, the decision to implement a school-based coordinated program had been approved by the school site council, as is required by law. However, the level of understanding on the part of the councils varied substantially among the schools visited.

As will be noted later, a common element found in most of the schools visited was the implementation of a child study team process. The school site councils understood this process at each school and generally felt that it was the child study team process that the council had reviewed and approved. Thus the child study team and the related referral and service procedures were the primary focus of the school site council's actions, not the legal shift from one set of laws to another. Indeed, many council members appeared unaware of the broad flexibility for which they applied when they approved the submission of a school plan to operate a coordinated program.

Two of the school site councils, however, had a clear understanding of the flexibility provided by implementation under the school-based program coordination provisions of the Education Code. Both of these councils has extensive discussions on the matter and made conscious decisions to implement under the new law. The vote of one of these councils was unanimous, the other council had two votes against implementation--one by a person concerned about the potential negative impact on special education, one by a person concerned about the gifted and talented program.

Few of the school site councils of the schools visited had any specific provisions for representation by parents or staff concerned with the special education program. Several of the councils did, however, have such people among

the members elected to the council through the general procedures required by law and two school site councils were reconstituted at the time of implementation of the School-Based Program Coordination Act to include parents of special education and bilingual pupils.

Regional Involvement In the Decision

Under current law regarding special education, most school districts operate within a consortium with other districts, often with the involvement of the county superintendent of schools, to provide special education services. The term for such a regional organization is the Special Education Local Plan Area (SELPA).

Without exception among the schools visited, there was no involvement of the regional special education consortium in the decision of the schools to implement a school-based coordinated program. Staff at the schools expressed no concern about this, since the resource specialist typically was a district employee located at the school, operating under district policies. The one exception to this response was a school where the resource specialist was a county employee (in this case the county was the SELPA for this region), and the initiative to implement a school-based coordinated program had come from the county office. However, the initiative had come from the county's consolidated application unit, so that there was no regional special education participation in this school's decision either.

In contacting schools to select a sample for the purposes of this study, the study team talked with staff at two schools that had considered implementing school-based coordinated programs, but had decided not to, at least in part because the regional special education staff had advised them not to go into the program (these were two different regions). With the exception of these two examples, there was no evidence of regional special education involvement in the decision-making process.

School Plans

In virtually all cases, the school plans contained very little change from the prior year to reflect the implementation of a school-based coordinated program. To the extent that such implementation was reflected in a plan, the focus was on the child-study team approach, including both the referral and service procedures. Not surprisingly, the plans reflected the focus of the school site councils; which was on the program at the school, not the shift to a substantially different set of legal constraints.

With a few exceptions, the plans contained little specific reference to special education or programs for gifted and talented (which are the two major programs outside of the traditional, consolidated application that may now be coordinated).

Finally, it should be noted that the school site plans included on the first page (one of the so-called "common pages") a box which schools checked if they chose to implement a school-based coordinated program. Based on our efforts to select a sample for the study, it was clear that several schools

checked that box in error, apparently interpreting the reference to coordination to mean a program description rather than the specific choice of an alternative body of law under which to operate.

Identification, Referral and Assessment

Child Study Teams

A fairly consistent finding of the study was the use of a child study team (often called another name, such as Child Study and Guidance Team or School Resource Team) as the coordinating mechanism for reviewing the progress of students and in helping match services to student needs. Indeed, many school staff and school site council members viewed their program as the child study team process, not as a program under a separate law called "school-based program coordination."

The child study team typically involved a team of professionals at the school site who met periodically to consider the appropriate strategy for serving individual students who were referred to the team. The formalization of this process ranged from a clearly defined "resource team" in New Haven Unified (the largest school district to implement school-based coordinated programs throughout the district) to ad hoc, informal discussions in small schools that had little turnover in staff.¹

Due to the significance of the child study team process to the implementation of school-based coordinated programs, a specific description of that process has been included in the summary of the program at each school visited. For that reason the variety of models will not be reviewed at length in this section. As a generalization, however, it may be concluded that major features in the operation of a child-study team process were:

(1) At each school with a formalized process, the scheduling and agenda management function of the team was clearly defined. Typically these schools had more staff and a larger number of student situations to review than the schools that relied on an informal process. The person identified to coordinate this function varied substantially from school to school, and included: the principal, the school improvement coordinator at one school, the counselors at a comprehensive high school, the student activities/Chapter 1 coordinator at another school--typically staff at the school site who had less direct instructional duties than classroom teachers or the resource specialist.

In smaller schools the "team" was called together on an ad hoc basis to review individual cases. For example, at the larger schools the team would usually have a specific agenda, several cases, and some formal notice of the

¹ At schools that did not have a formalized team process, there still was a clear understanding of whom to contact if a pupil was not progressing as hoped. At one small school, the contact person was the principal. At two other schools the "contact" was the resource specialist, each of whom had several years experience at that site. One of these two schools was considering the implementation of a formal process.

meeting time; while at the smaller schools the principal or resource specialist might simply talk to the people he or she thought should be involved and say "let's get together to discuss..."

(2) At larger schools, the scheduling of team meetings was typically limited to specific times and days. Although the team would not always meet on those days, the limitation to specific blocks of time greatly simplified scheduling. This feature allowed the coordinator to simply distribute notices that a meeting was going to be held without having to check with various staff schedules to insure that all could attend.

Two significant points regarding this feature are that: (a) the scheduling is tailored to meet staff, not parent needs. Although some schools invited parents, the scheduling was not nearly as complex as for IEP meetings, where much more emphasis is placed on the parents' schedule; (b) the involvement of classroom teachers on the team relied heavily on the practices at each school concerning such teachers staying after school periodically. Several staff emphasized the importance of keeping such team meetings short so that classroom teachers and other staff did not view the meetings as a substantial extra burden or time demand.

(3) The composition of the team consisted of a core of regular members and a variety of other staff people who were asked to attend as appropriate. The regular membership varied substantially from school to school, depending on the staff resources at each school. Indeed, no one staff person was a regular member of the team at every school visited. The membership of the team at each school is described in the individual school summaries in this report.

(4) The regular classroom teacher(s) of the pupil being reviewed was generally asked to attend the team meeting. In the case of James Logan High School (the large, comprehensive high school included in the study) this did in fact mean that four to six regular classroom teachers would often attend a team meeting.

(5) Although the focus of a team meeting was typically on the academic progress of a student, there were numerous cases at each school where the concern that caused the referral was the attitude, attendance or behavior of the pupil.

(6) For concerns about academic progress the team would typically decide on some specific ideas for the regular classroom teacher and any involved resource staff (aides or specialists) to use. The result of such meetings thus was not usually a change in classroom setting or staff assignments, but a revision in the approach used to help the student. Particularly at the high school level, where there were typically few supplemental resource staff available, the result was not to "add" another staff person to help the student.

There were, however, cases where the team discussions resulted in a change in the student's schedule in order to place him or her in a more appropriate class or grouping, provide time to work with a specific staff member, or get the student more involved through emphasizing one of his or her particular interests. At the elementary level it was common to have the principal involved

on the team, so such changes could be made at the meeting. At the high school level the counselor was involved, so such changes could also be made at those meetings.

(7) For non-academic concerns (such as attendance or behavior), the team meeting often resulted in follow-up conferences with parents or, in more involved or persistent cases, working with other community and social service agencies to respond to a family situation. At the high school level, the result would sometimes be a "contract" with the pupil where he or she agreed to change behavior or certain consequences would result. In this context the resources available were not categorical staff, but alternatives such as opportunity classes, continuation schools, academic probation, suspension or expulsion.

(8) In all schools visited where formal team meetings were held, the school file of the pupil was brought to the meeting. The team coordinator wrote into the file at the meeting the decisions of the team. Thus there was no separate record-keeping as a result of the child study team process.

The Referral Process

Typically referrals to the child study team came from regular classroom teachers. It was emphasized at every school that the success of this system relied on the classroom teachers being convinced that the child study team process was of value. Central to this "success formula" were the characteristics that not much paperwork was required and not much time in meetings was necessary.

At some schools the use of the child study team as a resource by the classroom teacher was emphasized by being explicitly added as a part of the teacher evaluation for every teacher during the first year of implementation.

There typically was a screening process between the classroom teacher and the child study team, so that not all referrals went to the team. At the elementary schools this screening was typically done by the principal or a resource staff person (for example, the school improvement coordinator, resource specialist, or reading specialist). At the secondary level the referral typically went to the counselor, who could then make a judgment based on factors such as whether other teachers had expressed similar concerns. Thus, a common system at many of the schools was that the decision to include a pupil on the team's agenda was made by a specified staff person, and was not automatic based on a teachers referral.

This non-automatic referral feature was significant, because it reflected an emphasis at all the schools on first seeking to determine what alternatives the classroom teacher had explored within the classroom setting, prior to making the referral.

The principal, counselor, or other resource staff could also refer pupils to the study team. Parents could also indirectly refer pupils, in that their expression of concern to a staff member could trigger a referral. However, there typically was no process for direct parent referral.

This referral process was, in all cases, expressly distinct from a special education referral. All the schools team maintained separate special education referral procedures. Once a pupil had been referred into that process, all the requirements and timelines of special education law were observed. Special education referrals took place in two manners: directly to special education, bypassing the child study team; or a referral from the child study team.

In summary, a pattern of referral was seen that consisted of three stages: (1) regular classroom teacher attempts to respond to student needs within the classroom, frequently after obtaining advice or consultation from other teachers or resource staff; (2) child study team reviews situations where individual teachers feel pupils are not making adequate progress within resources of the regular classroom; (3) students who appear to require more intensive assessment or services are referred to special education. When appropriate, however, the referral could be directly to the third stage.

Referral forms for the child study team process were consistently very brief. Typically the form involved no more than the name of the pupil, the referring staff member and a brief description of the concern. The "history" of the pupil and past school programs consisted primarily of the records already maintained as part of the cumulative record.

Special Education Referral and Due Process

As is apparent from the preceding discussion of the child study team process, the procedures used do not comply with special education requirements in terms of the membership of the team, the notice to the parent, the involvement of the parent, or the assessments conducted. These differences are intentional; the child study team process is purposely a less formal, less time consuming process than the procedures required in special education. The child study team process was designed at these schools to serve a different purpose than the special education requirements; it was intended to review a much larger number of students and to serve as a school management technique rather than a guarantee of parent or student due process.

The schools were consistent in their criteria for determining when to use the child study team process and when to use the special education procedures. The criteria used for following the special education procedures were:

(1) When a formal special education referral was made, either by a parent or a staff member. Typically a staff member referral reflected the judgment of the resource specialist or the principal that the pupil would probably require special education or related services.

(2) When a formal assessment of the pupil was desired. Frequently this decision would be made by the child study team. When parents participated in the child study team meeting, the assessment plan would sometimes be prepared and signed at that meeting.

Implementation

Although, the schools that operated under the school-based program coordination provisions of the Education Code were largely consistent in their use of a formal or ad hoc child study team process, there was substantial variation in how the schools organized their staff to provide services to pupils. The primary reasons for these differences were: (1) significant differences in staff resources at the schools, depending largely on the categorical programs operated by the school; (2) differences in the size (enrollment) of the schools; and (3) differences in the length of time that staff at the school have worked together.

In general, staff at the schools visited did not feel that there had been major changes in the roles of staff from the prior year. Indeed, for most of the schools the enactment of the School-Based Program Coordination Act provided them with the opportunity to do more directly what they had largely been doing already within the constraints of the separate categorical programs. For a few schools, however, the implementation of the school-based program coordination resulted in major changes in staff roles.

The Resource Specialist Program

Where the resource specialist was assigned full time to the school site, that individual was key to the implementation of the school based coordinated program. Typical roles of the resource specialist were:

(1) Primary responsibility for serving pupils requiring special education services through the resource specialist program. At all schools this was still the major activity of the resource specialist.

(2) Active involvement in the child study team process. This was viewed by school staff as one way in which the resource specialist was substantially assisting pupils not enrolled in special education--through his or her advice on strategies for assisting the student and help provided to the regular classroom teacher of that student. It should be noted that at none of the schools was the resource specialist responsible for coordinating the child study team.

(3) Greater openness to serving not enrolled in special education programs. The greater "openness" to serving such students was reflected in three ways:

(a) More consultation with and assistance for regular teachers, primarily as a result of the child study team process;

(b) Direct service to additional students in the resource room or resource center. In most cases, the school now allowed regular teachers with special education students who were assigned to the resource specialist for that period to also send other students who needed help with the same concepts. Typically these other students varied according to who most needed the special help, while the special education students were consistently assigned to the resource specialist for that period. An extensive example of this policy was observed at one school where the resource specialists operated an "open door" policy,

receiving students from classes even if no special education pupils were assigned from that class for that period. In this case the resource specialist controlled the flow of such students by requiring the regular classroom teachers to check with the resource specialist before sending a pupil, and by having the authority to refuse to allow students to be sent. As of the spring visit, the resource specialist staff felt the opportunity to send additional pupils had not been overused and had not resulted in a frequent need for the resource specialists to refuse permission to send a student.

(c) More flexible use of the resource specialist aides. In virtually every school, the special education aides provided assistance to pupils who were not enrolled in special education programs. This primarily occurred when the aides were sent to assist in a regular classroom in which one or more special education students were enrolled. The aides were aware of the identity of the special education pupils, and knew that assisting those pupils was their priority. However, they universally felt that they should help other students who requested assistance and that their helping those students resulted in less "labeling" of the special education pupils by their peers as "different." It also was apparent that this form of assistance to pupils was not a significant change from prior years and thus was not a "result" of school-based program coordination.

The most extensive form of coordination of the special education aide observed was at a small school where the aide allotment was for only a part-time person (approximately two hours per day). In this case the aide time was combined with other funds to support all the aides in the school so that there could be one aide in every classroom. One of these aides was then also defined as the special education aide for purposes of assisting the resource specialist for the school, who was itinerant and only at the school site two afternoons per week.

Another form of services to pupils not enrolled in special education was that in a few cases the resource specialist added to his or her caseload a pupil who was not otherwise eligible for special education. In each of these cases, the resource specialist felt that this was a new option that was directly attributable to school-based coordination. They also felt that the ability to take this action was positive. In each case the placement was made because it was felt that no other school resource could effectively assist the pupil, yet the student did not meet the eligibility criteria for placement in special education. In these few cases, the parents were informed of the services, but no individualized education programs were developed.

In every school visited, the resource specialist and the school principal did not include students not enrolled in special education in the numerical caseload of the resource specialist. The explanation for this was that such pupils were not routinely assigned to the resource specialist program. This method raises significant issues regarding legislatively established maximum caseloads. For example, at one school the resource specialist and two special day class teachers (who had been included in the coordinated program, although the law does not technically allow this option) were serving 108 pupils and staff expressed satisfaction with the program.

Described above are the more typical patterns of use of the resource specialist program at the schools that were visited. Following are two non-typical examples that represent more substantial variations from the traditional role of the resource specialist. In each case the new role is directly attributable to the implementation of the school-based coordinated program.

At Alvarado Elementary School, there had been substantial turnover of regular classroom staff. The school decided to use its resource staff (a resource specialist, a Miller-Unruh teacher, a SIP coordinator, and a media specialist) as "coaches" to the regular classroom teachers. Thus, as part of her duties, the resource specialist at the school serves as a coach to five regular teachers for all the students in those classes. In this capacity the resource specialist serves both as a consultant and as the link to the resource team (the child study team) for those five teachers. The primary purpose of this staffing pattern was to provide direct support to the many new regular classroom teachers at the school.

At El Rancho Verde Continuation High School, the resource specialist is the only generally available certificated resource staff person at the school (the other resource staff is largely funded by federal Chapter 1 and thus can not be "coordinated" under the provisions of the School Based Program Coordination Act). At this school the resource specialist was originally given responsibility for supervising all three aides (special education and Chapter 1) and coordinating the gifted and talented education program (GATE). Mid-year, however, the supervision of the Chapter 1 aides was shifted to the Chapter 1 certificated staff person. The responsibility to coordinate the GATE program substantially increased that program at the school, but it also represented a major increase in the workload of the resource specialist. For the 1983-84 school year the school plan calls for the resource specialist to continue to coordinate the GATE program, but with assistance from specific regular classroom teachers.

Finally, it was observed that schools with only a part-time resource specialist could not effectively coordinate the resource specialist program. The difficulties encountered were: (1) the limited time of the resource specialist only allowed for direct services to special education pupils, meeting with the special education aides to provide direction, and observing any potential referrals to special education; (2) child study team meetings could not effectively be coordinated with the resource specialist's schedule; and (3) the resource specialist typically had little experience with "regular" education pupils at the school that would make his or her involvement in the child study team valuable.

Designated Instruction and Services

None of the schools visited had coordinated any of the designated instruction and services personnel. In discussions on this topic, staff indicated that the speech therapist was itinerant (this was true for all the schools visited) and thus it would be difficult to coordinate the activities of that staff person. In addition, it was felt that the special skills and purposes of that staff person were less similar to the regular classroom program than those of the resource specialist program, and thus were less likely candidates for coordination.

With regard to adaptive physical education, staff had not considered "coordination" of that program. Upon discussion, it was felt that coordination of adaptive P.E. would mean enrolling pupils in the program without an individualized education program. Staff expressed some concern about using the school-based coordinated program for that purpose.

School Improvement Program

Each of the schools visited which received School Improvement Program (SIP) funds had included those funds within its coordinated program. However, the allocation of those funds typically reflected little change from the prior year. In large measure it was felt that this was due to the similarity between SIP and school-based coordination. School Improvement already provides virtually the same flexibility in the use of those funds as is provided under School-Based Coordination.

There were, however, some changes in the SIP program that resulted from the flexibility now provided other programs. For example, use of the SIP coordinator as a "coach" at Alvarado Elementary was allowable under SIP previously, but was largely made practical by the authority gained under School-Based Coordination to assign other coaches.

Another impact of School-Based Program Coordination was that it allowed the entire school to use the so-called "SIP days" for staff development. These provisions allow the staff to use a limited number of days for staff development or parent conferencing and claim ADA funding for those days, while not having students attend. Under SIP this provision might only be available to part of the school staff (for example, only the K-3 staff if the SIP grant was for grades K-3 in a K-6 school). Several schools indicated that the ability to use "SIP days" for the entire school staff was a major advantage in developing a coordinated school program.

Compensatory Education

The greatest variation in the interpretation of the legal provisions of the School Based Coordination Act was found with respect to compensatory education programs. The three major such programs in California are: federal Chapter 1, state Economic Impact Aid-State Compensatory Education (EIA-SCE), and state Economic Impact Aid-Limited English Proficient (EIA-LEP).

Federal Chapter 1 programs may not be coordinated under the provisions of the School Based Program Coordination Act. This is true because School Based Coordination is authorized by a state law, which has no authority over a federal program.

The School Based Program Coordination Act provides that if the number of educationally disadvantaged pupils in the school is less than 75 percent of the school's enrollment, Economic Impact Aid (EIA) funding may only be coordinated if there is state and local funding in the school available for allocation

pursuant to the school plan "which is equal to or greater than the per pupil amount allocated to that school per disadvantaged pupil through the economic impact aid program multiplied times 75 percent of the school's enrollment."

Major variation in the interpretation of this section was observed. Two schools had included the dollar value of their resource specialist programs in making the required calculation and had, therefore, decided that economic impact aid could be included in the coordinated program. ("Coordinating" Economic Impact Aid means that those resources can serve non-eligible pupils--typically students scoring above the 50th percentile.) Other schools limited their calculation to the dollars actually under the control of the site council (thus excluding special education) and therefore did not have adequate funding per pupil to coordinate their economic impact aid programs.

Programmatically, Economic Impact Aid funds were generally used to fund instructional aides. The effect of coordination was that the aides could be used flexibly without specific accounting to demonstrate that a proportionate share of aide time was being expended on Economic Impact Aid-eligible activities.

Gifted and Talented Education

Although several schools coordinated gifted and talented education (GATE) funding, the amount of such funding was always small (ranging from a low of \$1,000 at one school to a high of \$4,500). This reflects the fact that allocations under the GATE program, whether coordinated or not, are typically of limited amounts.

The general uses of GATE funds were to purchase materials and equipment to operate a gifted and talented or enrichment program, and/or to fund part of a certificated staff person's time to implement a GATE program. None of the schools used GATE funds to support instructional aides.

Each of the schools that coordinated GATE funding served all identified GATE students plus other students who could benefit from the program. Thus the funds were coordinated in that they helped support activities for non-identified pupils. In each case the limit on service was determined by the school (e.g., the optimal size of the grouping in the program). Each school indicated, however, that such service to non-identified pupils has occurred prior to initiation of the School Based Coordinated Program. Indeed, at one school the responsible staff person was relieved to discover that their activity could now be openly described (i.e., it was "legal") because of the new law.

In each school coordinating its GATE funding, school staff felt that the resources serving those students exceeded the categorical GATE funding. In some cases these "excess" resources came from other categorical programs now being coordinated. For example, at one school the GATE program was managed by the special education resource specialist, and the GATE funds were used entirely for materials and expenses. In the other cases, the "excess" support came from the local general fund.

Local Staff Development Program

Only two of the schools visited had chosen to coordinate funds they received under the Local Staff Development Program (AB 551). However, both schools had continued to have these funds administered by the county office of education as part of a consortium effort. Thus the funds were not actually incorporated into a school-based coordinated program.

Other Programs

Although the School-Based Program Coordination Act allows several other categorical programs to be coordinated, none of the schools visited had included those programs in their coordinated effort. These other five programs are: instructional television, career guidance centers, environmental education, new careers program, and the cadet corps.

Some of the schools, however, had used some of their federal Chapter 2 funds to purchase materials and equipment for schoolwide use and had included the proposed use of those funds within the school plan description of their coordinated program.

Staff Development

Staff knowledge of the provisions of the School-Based Coordinated Programs Act varied considerably, but was generally limited. Only two schools in the study had conducted fairly broad staff development programs on the new law and the school's implementation of it.

The school staff generally explained the lack of staff development emphasis on the new program as reflecting their perception that the program at the school had not significantly changed. At the schools where implementation of the new law was considered a major change, staff development efforts had focused on the new program. However, in all cases the staff development on the new law appeared to be very limited. The area of least awareness among both special education and regular education staff was the increased flexibility in the allowed use of special education staff and some other categorically-funded staff.

Review and Evaluation

Only one of the school districts in the study had initiated an evaluation of the new program operated under the School-Based Program Coordination Act--New Haven Unified. (As has been indicated, most of the other schools did not view the program as a major change from the prior year.)

New Haven Unified collected data from all eleven of its participating schools, including information on number of pupils referred to its child-study team (called the School Resource Team in New Haven), the number of special education pupils referred to the child-study team, the number of students served by the resource specialist and the number of such students who were not identified as being enrolled in special education. The results of this district

evaluation were not available in time to be summarized in this report, but the district has indicated that interested persons may contact the district's Director of Instruction for this information after September 1, 1983.

With regard to state "evaluation" of the program, none was conducted except for the funding of this study to document the programs that were being implemented at several schools. The state does, however, routinely review the school plans submitted by schools and conduct program reviews of some of the schools each year.

With regard to the "plan readings", the comments offered by the readers (often local school personnel who are trained by the state) seldom reflected an awareness that the school was participating in the School-Based Program Coordination Act. Particularly apparent was the lack of comments on the general absence of special education from the plans even though special education was being coordinated at those schools.

Two of the schools visited had been the subject of program reviews, during which a team of people from outside the school district visit the school to review and comment on the school's implementation of its consolidated programs. For both schools, the teams were part of a multi-school district consortium, and thus worked under state guidelines, but did not include state staff. In both cases school staff reported that the team members were not familiar with school-based coordinated programs. The team members were reported to have adjusted quickly, however, based on explanations of the law by school staff. The program reviews for both schools indicated above average scores overall, with one school receiving outstanding comments on its special education program (this was the school with the "open door" policy for its resource specialist).

Accounting

Several schools indicated that accounting for the use of funds coordinated under the School-Based Program Coordination Act continued to be a significant workload, as it had been prior to implementation under the Act. One school district had requested State Department of Education permission to include funds that were coordinated within a single account, but was denied that authority. A school in another district had multiple funding sources for every instructional aide, and continued to have to prorate the salary and benefit costs of those aides across the various accounts.

Staff Comments

The purpose of this study was to document the programs that were being implemented at several schools that had chosen to include special education within their program under the School-Based Program Coordination Act. The purpose, explicitly, was not to conduct an evaluation of those programs.

Nonetheless, during the visits to the schools in the study, numerous comments were offered by a wide variety of school staff regarding the programs. Although these comments do not constitute an evaluation, they warrant repeating in this report.

Overall the comments on the coordination of special education were tremendously positive. Indeed, the one special education staff person who, as a member of his school site council, voted against implementation of a coordinated school program, indicated that he would now vote in favor of implementation. Staff comments at all schools visited were that the implementation of the concept of least restrictive environment was extensive and successful at their school. Several of the schools had special day classes, and integration efforts included those special class pupils. At one school, the special class teachers themselves had been included in the coordinated program, with "regular" pupils coming into their classrooms for instruction and the majority of their special education pupils enrolled in other regular classes or the resource center for part of the day.

Staff comments on the child-study team process were also consistently positive at all schools (including comments on the established process where no formal team existed). Comments included the following:

- There is a greater awareness of the spectrum of psychological/emotional problems of students;
- Early identification of problems and problem situations take place;
- Teachers more readily identify students for study because follow-up will be provided;
- It's available to all students;
- The perceived stigma of special education is diminished;
- Teachers receive more assistance with students with special needs;
- All specialists are involved in the total school program and can therefore render more effective services; and
- There is shared program responsibility for students.

Although the comments were not negative, staff commonly expressed surprise that their school was in a program that was different from the laws under which most schools operate.

When asked what the state could do to provide assistance (this question was asked of a variety of staff at every school), the first response varied in its phrasing, but the sentiment was universal: the state needs to provide greater funding. The second response was, typically, that they needed help from the state in reducing paperwork, especially in special education.

PART II
INDIVIDUAL SCHOOL DESCRIPTIONS

This part of the Chapter on "Findings" is designed to provide the reader with specific descriptions of the variety of programs operated under the School-Based Program Coordination Act. Each school description is divided into the following sections:

Population Description -- In general the schools were small to medium in size, and did not have a diverse enrollment in terms of economically disadvantaged or limited-English proficient students.

Resources -- It was observed that a major factor in a school's use of the resource specialist was the range of other supplemental resources available.

Conversion to AB 777 -- This section describes the perceptions of the school's staff concerning the change to operating under the provisions of the School-Based Program Coordination Act.

Pupil Referral and Review Procedures -- A common element at the schools visited was a formal or ad hoc "child study team" mechanism to review individual student situations where the student was not progressing as staff thought was appropriate. This section describes that process at the school.

Other Categorical Services -- Describes the use of other supplemental staff or funds at the school.

Special Education Services -- Describes the use of special education staff at the school.

School Planning -- Describes the activities of the school in preparing to implement a program under the School-Based Program Coordination Act.

During the visits to the schools, it was apparent that one of the schools included in the study had not in fact implemented its proposed school-based coordinated program. Thus, the following individual school descriptions offer summaries of only eleven of the twelve schools in the sample.

**Alvarado Elementary School
New Haven Unified School District**

Population Description. Alvarado Elementary School has a current enrollment of approximately 590 students in grades K-4. The varying language backgrounds reflect over 12 languages other than English, with 110 students classified as limited English proficient.

Resources - The total consolidated application budget is \$112,557, of which \$69,029 is SIP funding; \$15,000 is Miller-Unruh funding; \$27,528 comes from Economic Impact Aid-Limited English Proficient sources; and, \$1,000 from Gifted and Talented Education (GATE) funds. The funds are spent for a Miller-Unruh Specialist, a program manager, aides, release time, materials, supplies, equipment and conferences. The school has a full-time resource specialist program.

Conversion to AB 777. The conversion to school-based coordinated programs represented a major change in the way the school allocates resources for students and the manner in which program services were delivered. Proposed budget cuts which would decrease aide services resulted in the school district identifying AB 777 as a vehicle which would more efficiently allocate resources to students. The provisions of AB 777 provided a means by which other program services could be made available to students as aide services were diminished.

Pupil Referral and Review Procedures. The school established the School Resource Team (SRT) is to focus attention and share information on students who are experiencing difficulty academically, behaviorally, in attendance, or are being considered for retention or for placement in the GATE program. The team is comprised of the principal, program manager, resource specialist, psychologist, and the classroom teacher. Where appropriate as dictated by need, the team may be expanded to include the speech and language specialist, the Miller-Unruh reading specialist and the media specialist.

The meetings are chaired by the principal or program manager, and parents are always invited to attend. Meetings are scheduled or rescheduled around parental availability. During the twice weekly and sometimes more frequent meetings, the team reviews referrals and the progress of students who have been submitted for study. The psychologist serves a key function in conducting all necessary assessments of students who are referred to the team for study. The assessment results help to build a profile of individual student progress as related to academics, behavior, attitude, and teacher concerns. Based upon available information and team deliberations, students may be recommended for program changes or further screening. Individual pupil progress is monitored.

The SRT also serves as an instructional support mechanism for teachers as well as students. In this capacity, four of the team members serve as coaches to the teachers. Each coach is assigned five classroom teachers to which they provide clarification, suggestions and information. Therefore, each teacher has a designated person to whom he/she can address concerns. The coaches are the program manager, resource specialist, Miller-Unruh teacher and the media specialist.

Students are initially placed into programs based upon assessment data and teacher screening. When a student is experiencing difficulty in an area, the teacher of the student meets with the assigned coach and together they develop a formal teacher plan on a form especially designed for that purpose. The teacher plan details a plan of action and expected outcomes.

If after a specified amount of time, success is not noted, the coach gives the student's name to the program manager, who assigns a specialist to assess the student and assist the teacher. The specialist assigned is determined by the child's area of need. The teacher and the specialist together develop a Teacher/Specialist Plan outlining further interventions. If success is not achieved with the student, the specialist refers the student to the School Resource Team for further study.

The procedural safeguards for special education appear to be maintained. If parents request screening for special education services or other interventions fail, the formal screening process for special education is initiated with required parent involvement and timelines being observed.

The expanded School Resource Team, including all coaches, meets once a month to discuss program and coaching needs and develop strategies.

Other Categorical Services. The specialist staff consists of a categorically funded program manager, Miller-Unruh reading specialist, six resource assistants (aides) and a media specialist.

The program manager coordinates the entire program and facilitates the activities of the other specialists in the resource team process. The Miller-Unruh specialist is operating under a waiver which enables her to work with the language and math skills of students as well as serving the reading needs of the school.

The media specialist runs a multi-media lab, which includes a library and a computer section. Students are scheduled into the lab on an individual, small group or total classroom basis. The media lab is utilized as a skills application and enrichment lab for all students. The media specialist coordinates all aspects of the lab, including planning, conducting lessons and circulating materials. Special education students are involved throughout the process.

The SIP and EIA/LEP paid resource assistants carry out the duties of instructional aides working with students in the areas of reading, language, math or English-as-a-Second-Language on a pull-out or in-classroom basis as determined by teacher plans or teacher/specialist plans.

Prior to the implementation of a school-based coordinated program, the aides/resource assistants had been assigned to individual classroom teachers for two hours a day.

Special Education Services. The special education services are provided by the resource specialist and her aide, a part-time psychologist, and a speech and hearing specialist.

The resource specialist serves students on a pull-out basis with the assistance of an aide. The resource specialist serves some students who are not enrolled in special education based upon teacher/specialist plan prescriptions. She is serving 27 students who have individualized education programs (IEPs). She is active in the resource team process and serves as a coach for five regular classroom teachers. The resource specialist coordinates her services with regular classroom teachers by meeting with them at least monthly. During these meetings she shares strategies and materials for use with regular education and handicapped youngsters. The resource specialist aide serves students in the resource room and incidentally serves students in their classrooms. The aide occasionally works on a short-term basis with students who are not enrolled in special education.

The psychologist's role broadened under AB 777 implementation such that he is active in the resource team process, collecting assessment data and synthesizing information for all resource team meetings.

School Planning. The school site council was involved in the decision to implement the school-based coordinated program. Both council and non-council parents participate in school improvement days and work on program committees. The composition of the school site council was reconstituted to include special education and bilingual parents at the time of AB 777 implementation.

**Buckeye Elementary School
Buckeye Union Elementary School District**

Population Description. Buckeye Elementary School has a current enrollment of approximately 448 students in grades K-5.

Resources. The total consolidated application budget is \$80,084, of which \$56,982 is SIP funding. Funding from EIA sources totals \$5,000, and Chapter 1 funds total \$18,000. A large portion of these funds is spent on a Chapter 1 lab teacher and instructional aides with the remainder being allocated in supplies, employee benefits and contract services. The school has a full-time resource specialist program.

Conversion to AB 777. The conversion to school-based coordinated programs did not represent a major change at the school, but was viewed as a vehicle to further expand an existing integration of special education and regular education services. According to school staff there were no significant changes in the program either attitudinally or in services provided.

Pupil Referral and Review Procedures. A diagnostic placement team called the child study and guidance team (CSGT) had met for a while at the school site. The team met for the purpose of determining the placement of all students who were considered for reasons of potential retention, attendance or behavior problems or placement in the gifted and talented education program. It was decided that the meetings were unnecessary and the functions of the team could be carried out by the principal and the resource specialist. The practice has been modified accordingly and school staff reported that the process is working well.

Other Categorical Services. The categorically funded specialist staff consists of a Chapter 1 lab teacher and SIP/Chapter 1 funded aides. One aide is multi-funded.

The Chapter 1 teacher runs a resource room which serves grades 1-2 and works with students in reading, language, and math on a pull-out basis. The students are identified for the program by scoring below the 50th percentile, with those below the 25th percentile being given priority. The Chapter 1 teacher received students on a designated classroom basis with students being further grouped by skill levels and needs. She has the assistance of two aides who work in the lab in the afternoon.

The SIP learning center primarily serves students in grades 4-5, and is staffed by two SIP-paid aides who have spent many years running the program. The students are assigned to the center for remediation of reading, language, math and spelling needs. Students attend by grade level and class and are regrouped by skill needs. Along with providing remedial services, the learning center staff works with some accelerated students in the area of spelling. The center also serves as a study hall for students and a testing center for incoming 4th and 5th grade students.

Students who attend the resource specialist program (RSP) may attend the learning center for other subject areas. They also attend the center when transitioning out of the resource specialist program.

Additionally, the school has the services of an SIP-paid teacher who runs a "Math/P.E. flip-flop" program. During designated time blocks, a portion of each class is instructed in physical education while the remainder of the class is instructed in math. The program grew out of a district focus on improving math scores. Special Education students are included in this program.

Program coordination and scheduling is facilitated by the fact that all teachers at a given grade level have reading, language and math at the same time.

New computers have been purchased with GATE funds. The school plans to have students in the GATE program train other students in use of the computers.

Special Education Services. The resource specialist program represents the only full-time special education resources available at the school. The County funded speech, and district funded psychologist and nursing services are itinerant.

The speech therapist serves only those students with an IEP requiring speech services, and is currently serving 21 students with the support of an aide.

The resource specialist program is currently serving 28 students, of whom three are not enrolled in special education. The program primarily serves students on a pull-out basis.

The resource specialist serves a significant role in screening candidates for special programs and making recommendations relative to program placement. He, along with the principal, serves as the school's child study team.

The due process and referral process for special education appeared to be maintained. If parents request assessment for special education services or other interventions fail, the formal assessment process for special education is initiated with required parent involvement and timelines being observed.

The principal of the school is actively involved in special education issues and represents the district as a member of the County Special Education Board of Directors.

School Planning. The school site council is aware of the decision to implement the school-based coordinated program, but apparently does not perceive the decision as a major change. The site council was reconstituted at the time of AB 777 implementation.

Parents and staff serve on committees to develop components of the school plan and are very involved in program planning, monitoring and evaluation.

**Gold Oak Elementary
Gold Oak Union Elementary School District**

Population Description. Gold Oak Elementary has a current enrollment of approximately 581 pupils in grades K-8.

Resources. The consolidated application budget for Gold Oak Elementary consists of \$89,053, of which \$63,894 is SIP funding. The balance of the budget consists of \$5,000 in Economic Impact Aid- State Compensatory Education and \$20,159 in federal ECIA Chapter 1 funds. In addition the school receives Gifted and Talented Education (GATE) funding, has a full-time resource specialist program, has two district-operated special classes located on campus, and has two county-operated special classes located on the school site. The SIP funds are used overwhelmingly to provide instructional aides for grades K-8. The EIA and Chapter 1 funds are used to support a compensatory education resource teacher.

Conversion to AB 777. The conversion to AB 777 was not viewed as a major change for the school. In general the feeling was that AB 777 allowed more explicitly the kind of activities Gold Oak was already conducting.

Pupil Referral and Review Procedures. Although Gold Oak does not have a formal child study team, it has a highly coordinated resource group consisting of the resource specialist, the two district special class teachers, and the Chapter 1 resource teacher. The resource specialist is the leader of the coordination effort and spends a significant amount of her time working with the other resource staff and responding to inquiries from regular classroom teachers.

One of the special class teachers and the compensatory education resource teacher take the lead for the primary grades and the resource specialist and the other special class teacher take the lead for the upper grades. It was observed, however, that the resource specialist worked across all grade levels with regard to coordinating activities and was widely recognized as central to the coordination effort.

The school also operated a separate "Gold Oak Accelerated Learning" program which was the school's GATE program. This program was operated by a full-time GATE teacher who was funded with GATE and school district general funds. The referral to the GATE program and decision to enroll a pupil in the program was made by this teacher and was entirely separate from the referral and service system operated by the special education staff and the compensatory education teacher.

Although the system operated by the special education staff and the Chapter 1 teacher operated informally and on the basis of verbal referrals, it maintained a complex scheduling system that resulted in a wide variety of groupings and extensive integration of special education pupils with students not enrolled in special education. The staff indicated that maintaining this system resulted from

several years of experience of this resource staff working together. Nonetheless, the resource specialist indicated that the system was now so complex and the enrollment so large that they were considering the implementation of a formal child study team process.

Other Categorical Services. The non-special education supplemental resources at the school consisted of school improvement, Chapter 1, EIA, and GATE. The school improvement funds were used almost entirely to support instructional aides who were assigned directly to regular classrooms. Thus they were not used as a supplementary resource to the regular program, but rather as supplemental assistance within the regular classroom settings. Each aide was supervised directly by the regular classroom teacher to whom he or she was assigned.

The Chapter 1/EIA resource teacher worked largely with grades K-3 and served only pupils who were identified as eligible for compensatory education services. Since the funding for this staff person was primarily federal, it was not possible to coordinate most of this person's activities in the sense allowed by the School-Based Program Coordination Act. This resource teacher did typically act, however, as the first contact for regular classroom teachers in the primary grades who felt that a pupil was not progressing at the desired rate. The resource teacher then maintained close communication with the special class teacher for those grades in terms of referring pupils into the resource system operated by the special education staff.

The Gifted and Talented program at the school appeared to operate independently from the special education and compensatory education resources. The referral and testing systems were designed and administered by the GATE teacher and referrals were made directly to this teacher.

Special Education Services. The organization of special education services at Gold Oak Elementary was unusual in that both special class teachers operated somewhat as resource specialists. Indeed, one of the special class teachers appeared to be performing a resource specialist role much more than a typical special class teacher role.

The special education staff operated almost exclusively a pull-out program with students coming to their classrooms. The special education aides also spent most of their time in the special education classrooms. A significant number of students who were not enrolled in special education also attended programs in these rooms throughout the day. At the time of the visit, it was estimated that these three special education teachers and their aides were serving 108 students in their programs.

The three teachers worked together to maintain a complex scheduling system that promoted a variety of groupings of students, movement of special education students (including special class students) into regular classrooms, and movement of regular class students into the special education programs for one or more periods per day. Numerous students were served in these programs based on verbal referrals from regular teachers and agreement that a pupil could benefit from special assistance in one of the special classes. If, however, a student required a formal assessment, or non-temporary assistance in the program, the

pupil was referred to special education and an IEP was developed. The group also worked on a more limited basis to integrate students from the county-operated special classes into their programs for part of the day.

Gold Oak also received the services (two days per week) of an itinerant speech therapist employed by the county office of education. This staff person served only pupils who were identified special education pupils.

School Planning. Several members of the school site council was aware of the decision to implement under AB 777. However, it appeared that many of the council members were not aware of the degree of flexibility allowed by the new law.

The special education staff made a presentation to the school site council about their activities, but the presentation was treated largely as an information item. It was not the Council's perception that special education was to be explicitly described in the school plan, nor that the use of those special education resources was to be part of the deliberations of the school site council.

Similarly, the school site council did not view the Gifted and Talented Program within its jurisdiction, although the GATE program was also marked on the application as being coordinated at the school. The GATE funding also was not reported in the school plan budget.

The focus of the school site council continued to be primarily on the use of the SIP funds and on the use of the aides supported with those funds.

**Mammoth Elementary School
Mammoth Unified School District**

Population Description. Mammoth Elementary School has a current enrollment of approximately 350 students in grades K-6.

Resources. The total consolidated application budget is \$71,139 of which \$53,525 is School Improvement Program (SIP) funding. Other resources come from Economic Impact Aid (EIA) and Chapter 1 sources.

Conversion to AB 777. The conversion to school-based coordinated programs did not represent a major change at the school, but provided the school with a vehicle to accomplish what had previously been achieved only by obtaining waivers.

School staff indicated that, for a number of years, the school had obtained waivers for the resource specialist program, so that services could be extended to students not enrolled in special education, but who had similar needs. School staff felt that under AB 777 there were no significant changes in the program either attitudinally or in services provided.

Pupil Referral and Review Procedures. The process for screening and designating services for students is the child study team (CST). The purpose of the child study team is to focus attention and share information on students who are having difficulty academically, behaviorally, in attendance, or are being considered for retention. The CST meetings include the principal, nurse, psychologist, resource specialist, and regular classroom teachers as necessary. Parents may also be invited.

During the meetings the team reviews students whose names have been referred for study. Records are kept and recommendations for program changes, further screening and progress are monitored. The programs of students who have IEPs are monitored twice a year. The child study team process may be initiated by teachers, parents, or by students themselves.

Other Categorical Services. The "other" categorically funded staff consists of a Chapter 1 funded learning lab teacher who serves students for one-half day. Students receive services in the basic skill areas from the Chapter 1 teacher.

Additionally, the school SIP funds provide eight instructional aides for 3 1/2 hours per day each. The aides are assigned to individual teachers' classrooms. The remainder of the categorical budget is spent on supplies, equipment, employee benefits and substitute days for teachers.

Special Education Services. The resource specialist, one special day class serving learning handicapped students and two special education aides represent the full-time special education resources available at the school. The counselor, speech specialist, adaptive physical education teacher, and special day class teacher serving the infant program provide part-time services.

The resource specialist program is currently serving 27 students who have IEPs and several other students who are considered "drop-ins". The students who "drop in" are being served in the same basic skill areas as are the special education students, but are not reflected on the resource specialist's caseload.

To minimize the number of times that students are pulled out of their regular classroom instruction, the speech specialist pulls students out of the resource specialist room instead.

The due process and referral process for special education appear to be maintained. If parents request screening for special education services or if other interventions fail, the formal screening process for special education is initiated with required parent involvement and timelines being observed.

School Planning. The school site council is aware of the decision to implement the school-based coordinated program, but does not perceive the decision as a major change. There was no change in the composition of the site council at the time of AB 777 implementation.

**O'Neill Elementary School
Saddleback Valley Unified School District**

Population Description. O'Neill Elementary School has a current enrollment of approximately 450 students in grades K-6. Though the varying language backgrounds include more than 10 languages other than English, only 4 students are classified as limited English proficient.

Resources. The total consolidated application budget is \$55,165, of which \$54,709 is School Improvement Program (SIP) funding. Funding from Economic Impact Aid totals \$456. The bulk of SIP funds is spent for instructional aides, and a small portion of the coordinator's salary, with the remainder being used for instructional support in the form of materials and professional development.

Conversion to AB 777. The conversion to school-based coordinated programs did not represent a major change at the school, but was viewed as a vehicle to facilitate expansion of an existing effort to integrate special education and regular services.

The impetus for conversion to school-based coordination grew indirectly out of preparation for a program review which indicated that special education classes were located too far away from the regular classes. Subsequently, the special education classes were relocated and special education students were increasingly integrated into the regular school program. School staff indicated that school-based coordination was providing a means by which the school could better integrate regular and special education services.

Pupil Referral and Review Procedures. O'Neill Elementary operates a Child Study and Guidance Team (CSGT), the purpose of which is to focus attention and share information on students who are having difficulty academically, behaviorally, or socially. The CSGT meetings are chaired by the principal and include the nurse, psychologist, resource specialist, speech specialist, program coordinator, and regular classroom teachers as required. Parents are frequently invited to attend.

During the typically 2-1/2-hour meeting each week, the team reviews referrals and the progress of referred students. Students may be referred by any staff member. The principal keeps the minutes and documents generated at all meetings. Recommendations for program changes, further screening, and progress are monitored.

Other Categorical Services. The categorically funded specialist staff consists of a program coordinator, who in addition to coordinating the SIP program, runs a basic skills media lab. She has the assistance of four aides funded through SIP, two of whom provide support in the media lab. Students attending the lab are grouped by skill needs. Special education students in the special day classes also attend. Special education students also attend the music classes provided by the two district funded music teachers.

Special Education Services. The special education resources available at the school are the resource specialist program and two special day classes serving communicatively handicapped students. The psychologist, speech therapist, adaptive P.E. teacher and nurse provide regular, but not daily, services.

At the time of the site visit the resource specialist was serving twelve special education students, with some other students also attending periodically based upon similar need. School staff indicated that the students not enrolled in special education were not attending the resource room enough to be counted on her caseload. There also was some flexible use of the resource specialist aide. When the aide was in a regular classroom to assist a special education student, she incidentally would help other students with similar needs.

Special day class students were integrated to the extent deemed appropriate, and school staff indicated that generally students were meeting success in integrated situations. One of the special day class teachers was team teaching with a regular education teacher for selected non-academic subjects.

The procedural safeguards for special education pupils appeared to be maintained. If parents requested screening for special education services or all interventions from the regular education resources failed to meet with success, the formal process was initiated with required parent involvement and timelines being observed.

School Planning. The school site council is aware of the decision to implement the school-based coordinated program, but apparently does not perceive the decision as major. There had not been a change in the composition of the site council at the time of AB 777 implementation.

**Reeds Creek Elementary School
Reeds Creek Elementary School District**

Population Description. Reeds Creek has a current enrollment of approximately 89 students in grades K-8. It is the only school in the school district. The school has four full-time certificated staff, each teaching a multi-grade class.

Resources. The total consolidated application budget is \$15,114, of which \$5,463 is School Improvement Program (SIP) funding, \$5,050 is Economic Impact Aid-State Compensatory Education, \$1,884 is federal Chapter 1, \$2,500 is federal Chapter 2, and \$217 is AB 551 Staff Development. All of these resources, except the federal Chapter 1 funds, are coordinated under the School-Based Program Coordination Act. The funds are combined with the allocation for a part-time special education instructional aide to jointly fund an aide for each classroom. A small amount is used for materials and supplies, and for substitutes to provide release time for staff development.

Conversion to AB 777. The program at the school represented a significant change from prior years, but the change resulted primarily from a major reevaluation taking place as part of the school planning process required under the consolidated application. Staff felt that the impact of entering school-based program coordination was less than the reevaluation of the school's activities that was already underway.

Pupil Referral and Review Procedures. The school did not have a formal child study team, since the small size of the school's staff allowed informal discussions to take place as necessary. The school principal was one of the four classroom teachers, and all staff viewed the principal as the primary contact when there were difficulties in helping a student progress appropriately. The relatively low turnover both in school staff and students enrolled at the school also reduced the need for formal team meetings.

The resource specialist assigned to the school was a county employee who came to the school two afternoons per week. The principal sometimes used the skills of the resource specialist to assist in designing programs for students not enrolled in special education, but the resource specialist's limited time at the school required that most of her time be focused on direct special education services.

Other Categorical Services. The staffing pattern for the school was a teacher and an aide in each classroom. Each aide was jointly funded with categorical funds and local general fund monies. The flexibility provided by the School-Based Program Coordination Act resulted in less paperwork to justify the portion of each aide's salary that was funded by each categorical program. School staff indicated this benefit was significant and commented on the paperwork still required for the Chapter 1 program (which may not be coordinated under AB 777). School staff estimated that "one file draw" of paperwork documenting assistance to Chapter 1 pupils could be eliminated if Chapter 1 could also be coordinated.

At this school the use of the Chapter 2 funds was included in the school plan that was developed by the school site council.

Special Education Services. The special education-funded services at the school consisted of a part-time instructional aide and services by an itinerant resource specialist employed by the county office of education. The funding for the aide was combined with the other funding sources to support the four instructional aides at the school.

The resource specialist was aware of the coordinated program at the school and served three students who were not identified as requiring special education. Services to non-identified students were either in combination with services to identified pupils (for example, two special education students were served in a group of four pupils) or on a temporary basis of providing direct assistance. Due to the resource specialist's limited time at the school, however, she was not actively involved in school planning or in meetings to discuss the progress of pupils who were not identified as special education students.

School Planning. The school entered the School-Based Program Coordination Act at the suggestion of the county office of education's consolidated programs unit. The decision to implement the program was reportedly a conscious one in which the school site council understood the program and the flexibility it provided. The decision of the school site council to enter the program was unanimous.

**Wellwood/Palm Elementary School
Beaumont Unified School District**

Population Description. Wellwood/Palm Elementary School is a K-3 program on two sites described under one consolidated program application and one written plan. The campuses are located a few blocks apart and each has a site administrator. The school has a current enrollment of 780 students. (Unless specific reference is made to only one site, the term "school" in this summary refers to the two campuses in combination as a single K-3 program). The language backgrounds include six languages other than English, with 66 students classified as limited English proficient.

Resources. The total consolidated application budget is \$239,487, of which \$106,288 is School Improvement Program (SIP) funding; \$111,974 is Economic Impact Aid (EIA) - State Compensatory Education funding; \$9,240 is EIA-Limited English-Proficient and \$11,985 comes from federal Chapter 1 Neglected and Delinquent (N&D) funding. Funds are expended for a Reading Achievement Center director, two diagnostic specialists, instructional aides, instructional materials, equipment, mileage and other costs.

Conversion to AB 777. The conversion to school-based coordination was seen by the school as a means by which program services and resources could be utilized across categorical program lines.

Pupil Referral and Review Procedures. The process for screening and designating services for students is the Child Guidance Intervention Team (CGIT). The purpose of the CGIT is to focus attention and share information on students who are having difficulty academically, behaviorally, in attendance, or are being considered for retention.

The team consists of the principal at either site, the classroom teacher, the diagnostic teacher and the speech specialist when appropriate. The resource specialist and the speech specialist travel between schools for meetings at either site. Both administrators may be involved in a CGIT meeting on issues related to cross-school services or transfers of students based upon program needs.

Records are kept and recommendations for program changes, further screening and progress are monitored. The Child Guidance Intervention Team process may be initiated by staff or parents, and school staff reported the process is working well.

Other Categorical Services. The categorically funded staff consists of a State Compensatory Education (SCE) funded diagnostic lab teacher at the Wellwood (K-1) site, and a SCE funded Reading Achievement Center director at the Palm (2-3) site.

The diagnostic lab teacher, with the assistance of SCE-funded aides, serves students on a pull-out basis in the areas of reading, language and mathematics. Students are identified for the lab program based upon student performance data and through the Child Guidance Intervention Team process. All students are potential candidates for services in the lab, including special education pupils.

Children come to the SCE funded Reading Achievement Center at the Palm (2-3) on a pull-out basis and are grouped by skill areas.

Prior to AB 777 school-based coordinated program implementation, the Reading Achievement Center program was essentially a half day, morning program. Now the resource specialist, resource specialist aide and classroom aide, staff the Reading Achievement Center in the afternoon. The program has been expanded to allow all students access to the lab.

In addition to these programs, there are aides assigned to individual classrooms who work with all groups of students. There also is a health aide who works in the nurse's office and has basic health related duties. The ESL aides work in the diagnostic centers of each school on a pull-out basis and in the classrooms with limited English proficient students.

Special Education Services. The full time special education resources at the school are the resource specialist program and a special day class. The psychologist, speech therapist and nurse provide regular, but not daily, services.

The resource specialist operates a pull-out program in the morning with the services of a resource specialist aide. In the afternoon, he directs the Reading Achievement Center. In this capacity he supervises the activities of students not enrolled in special education as well as pupils in with individualize education programs.

The special day class serves students designated as learning handicapped. Students were in a self-contained setting for most of the day, with variable levels of integration taking place. The speech and language specialist serve special education students on a pull-out basis. Since the resource specialist program and special day class are located at Palm (2-3) school, any students requiring the programs are transferred to Palm School.

The due process and referral process for special education appeared to be maintained. If parents requested screening for special education services or if all interventions from the regular education resources failed to meet with success, the formal process was initiated with required parent involvement and timelines being observed.

School Planning. The school site council participated in the decision to implement school-based coordinated programs. They saw school-based coordination as a vehicle for more effective use of program services and resources. The council was reconstituted at the time of implementation to include a special education parent.

**Wilson Elementary School
Wilmar Union School District**

Population Description. Wilson Elementary School has a current enrollment of approximately 210 students in grades K-6. The language backgrounds indicate 4 languages other than English, with 2 students classified as limited English proficient.

Resources. The total consolidated application budget is \$29,606, of which \$16,474 is School Improvement Program (SIP) funding. Funding from Economic Impact Aid sources total \$5,244 and federal Chapter 1 funds total \$7,888. A large portion of the funds is expended for a skills specialist/resource teacher whose salary is supported with SIP, EIA, and Chapter 1 funds. The balance of funds is spent for clerical support, employee benefits and travel.

Conversion to AB 777. The conversion to school-based coordinated programs did not represent a major change at the school, but was viewed as a vehicle to further expand an existing integration of special education and regular education services. School staff indicated there were no significant changes in the program either attitudinally or in services provided.

Pupil Review and Referral Procedures. The mechanism for screening and designating services for students now, as in the past, is the District Diagnostic Team (DDT). The purpose of the District Diagnostic Team is to focus attention and to share information on students who are having difficulty academically, behaviorally, emotionally, in attendance, or are being considered for retention, or for enrollment in the Gifted and Talented Education (GATE) program.

The DDT meetings are held on an as-needed basis. Students may be referred by staff members or parents. The DDT meetings are chaired by the principal and include the resource specialist, special day class teacher and resource/skills specialist.

Other Categorical Services. The categorically funded specialist staff consists of a skills specialist/resource teacher who runs a reading, language, and auditory skills lab. She also provides English as a Second Language Instruction when needed. It was indicated, however, that none of the students required ESL services this school year.

There are also two district funded aides, one at the kindergarten level, and one at the first grade level.

The school program also included a homeroom concept which is very similar to that found in secondary schools. For the first 15 minutes of each day, students attend their homerooms by grade level to hear announcements, and receive other information. Special day class (SDC) students are also assigned to a regular homeroom by grade level. For most students, the homeroom is the classroom in which they remain for the rest of the day. SDC students, RSP, skills lab students, and students receiving services from other specialists leave for varying intervals, at different times after the close of homeroom activities. School staff reported that the homeroom integration was working well.

Special Education Services. The full time special education resources at the school are the resource specialist, special day class teacher serving educationally handicapped students, and 3 special education aides. A psychologist, speech therapist, and nurse provide itinerant services.

The resource specialist is funded by Special Education, Chapter 1 and GATE funds, and at the time of the site visit, was serving 14 special education students and some Chapter 1 eligible students who receive math instruction. The students not enrolled in special education are not counted on the resource specialist caseload.

There is flexible use of the resource specialist aide and the math aide, both of whom work most frequently in the resource specialist room. These aides are used to transition students out of special programs and into regular classrooms. The aides go into the classrooms and work with students who are phasing out of special education or Chapter 1 services. When the aides go into the classrooms to work with special education students, they incidentally also work with some other students with similar needs.

The hierarchy of program interventions is Chapter 1 to resource specialist program to special day class. Therefore, when students phase out of the special class they receive resource specialist or Chapter 1 skills lab instruction, and aide support in their regular classroom. School staff report that this stratified support system is working well.

The procedural safeguards for special education appeared to be maintained. If parents request screening for special education services, or other interventions fail, the formal screening process for special education is initiated with required parent involvement and timelines being observed.

School Planning. The school site council is aware of the decision to implement the school-based coordinated program, but does not perceive the decision as a major change. There was no change in the composition of the site council at the time of AB 777 implementation.

**El Rancho Verde High School
New Haven Unified School District**

Population. El Rancho Verde is a continuation high school with a current enrollment of approximately 225 students in grades 9-12. The school enrolls eighteen students who are identified as limited-English proficient, with the students representing two different primary languages.

Resources. The consolidated application budget consists of \$61,000. Of this amount, \$60,000 is from the federal Education Consolidation and Improvement Act (ECIA) Chapter 1 program and \$1,000 consists of Gifted and Talented Education (GATE) funds allocated to the school. Since the Chapter 1 funds cannot be coordinated, the only programs included under the School-Based Program Coordination Act were Gifted and Talented and special education. The special education program at the school consists of a full-time resource specialist and aide. The Chapter 1 funds were used to support half of the costs of a certificated program manager and all the costs of two instructional aides. The balance of the Chapter 1 funds were used for materials and supplies. The other half of the program manager's salary was paid out of the school district general fund.

Conversion to AB 777. The conversion to AB 777 represented a major change for El Rancho Verde, although the change was already underway due to the addition of special education staff to the school and the establishment of the school resource team. These three factors resulted in the school's program being significantly different from the prior year's.

Pupil Referral and Review Procedures. The School Resource Team used at El Rancho Verde appeared well-defined and well understood by school staff. The team consisted of the Chapter 1 Program Manager, who coordinated the team; the assistant principal (whose major duties at the school were discipline and attendance-- most of the students at the school were there because of attendance problems); the counselor; and the referring teacher. The principal and the resource specialist also routinely sat in on the school resource team (SRT) meetings.

Referrals to the SRT were generally made through the Program Manager, who scheduled all SRT meetings and prepared the agenda. The referral request was simple and minimal paperwork was required. Since some of the students served through the SRT were not Chapter 1 eligible, the Program Manager was supported half-time by the district general fund.

The options for pupils that were discussed at SRT meetings at El Rancho were significantly different from the elementary schools for two reasons. First, the availability of supplemental resource staff was quite limited; thus the options tended towards ideas for use by the regular teacher or for changes in scheduling that might better serve the pupil. Second, was that a large number of the referrals related to attendance or behavioral problems, rather than academic difficulties. Thus the involvement of the counselor and the assistant principal was made a regular part of the SRT.

Other Categorical Services. There were four instructional aides at El Rancho Verde. One aide was funded by special education, two were Chapter 1 aides, and the fourth was funded by the pregnant minors program. The aide for the pregnant minors program worked exclusively with that program.

In fall, 1982, the two aides funded by Chapter 1 were placed under the supervision of the resource specialist, so that there would be maximum coordination of the services they provided. By mid-year, however, supervision of these two aides had been shifted to the Chapter 1 Program Manager. This was done in order to provide better assurance that the school was complying with Chapter 1 requirements, and in order to reduce the workload of the resource specialist.

The Program Manager handled testing for the Chapter 1 program, coordinated student activities (such as the student council), staffed the computer lab, and coordinated the School Resource Team process. Thus, although the Program Manager was central to the operation of the school's referral process, he was not primarily engaged in the direct instruction of students.

The Chapter 1 aides were limited by federal law to serving Chapter 1 eligible pupils. They generally did so by serving students in the regular classrooms at specified times, rather than operating a resource room program.

The \$1,000 allocated in the school plan for Gifted and Talented Education was used primarily for materials and supplies. The GATE program was coordinated by the special education resource specialist.

Special Education Services. The resource specialist at El Rancho Verde began the school year with assignments to operate the special education program, supervise the two Chapter 1 funded aides, and coordinate the Gifted and Talented Education program. This responsibility was revised mid-year to eliminate the supervisory responsibility for the Chapter 1 aides. For the coming year the school is planning on assigning regular teachers to help the resource specialist with the GATE Program, although the resource specialist will continue to have the responsibility for coordinating that program.

Both the resource specialist and the special education aide serve pupils at El Rancho Verde who are not identified as special education pupils. For the resource specialist this is primarily limited to students that are served through the GATE program.

The special education aide is assigned to various classes during the day based on the enrollment of special education pupils in those classes. Once in the classroom, however, the aide will help any student requesting assistance. The aide was aware of the identified special education pupils and felt that these pupils were her first priority. In total, however, the aide felt she assisted more pupils who were not enrolled in special education than those in special education. She also felt that this system provided necessary assistance to such pupils and helped avoid marking the special education students as "different".

School Planning. The decision of El Rancho Verde to operate under the School-Based Program Coordination Act was primarily a result of the district's decision to pursue this policy throughout the district. Since El Rancho does not have a school improvement program, its experience with school site councils was limited. The school principal indicated that a point of emphasis during the 1982-83 school year was to strengthen the school site council's understanding and involvement in the planning process.

**James Logan High School
New Haven Unified School District**

Program Description. James Logan is a school of approximately 2,500 pupils enrolled in grades 9-12. The school population includes about 200 limited-English proficient pupils with over 20 primary languages other than English.

Resources. The total consolidated application budget for the school is \$180,130, of which \$148,947 is School Improvement Program (SIP). The remainder is \$29,583 from Economic Impact Aid (EIA) and \$1,600 from Gifted and Talented Education (GATE) funding. The school has a special day class on campus as well as three resource specialist programs.

Conversion to AB 777. The conversion to the school-based coordinated program was not considered a major change at the school, and, in fact, appeared to provide only a marginal increase in flexibility in the use of the resource specialist aides. The primary change in the program was the introduction of the school resource team, which was an action that took place at the same time as the implementation of the school-based coordination program. The introduction of the school resource team (SRT) was part of a districtwide program.

Pupil Referral and Review Procedures. The purpose of the School Resource Team is to focus attention and share information on students who are having difficulty academically, behaviorally, or in attendance. Unlike the elementary schools, there are few supplementary resources at Logan to aid a pupil with special needs. Therefore, the primary outcome of an SRT typically is increased insight into the situation on the part of the parent, student and staff and an agreement regarding specific activities for addressing any problem area.

The SRT is chaired by the counselor for the pupil under discussion. There is a different SRT for each pupil. Each SRT includes the appropriate counselor, the six regular teachers of the student; the SRT also may include the vice-principal, a resource specialist, school psychologist, and/or other staff as deemed appropriate by the counselor. The parent(s) and the pupil are also strongly encouraged to attend. An SRT team meeting may be called by the counselor at the request of a teacher or the parent, or at the discretion of the counselor.

SRTs are typically held immediately after school and last about one half hour (from 2:30-3:00 p.m.). At the time of the first visit in late November, it was estimated that virtually every teacher in school (130 certificated staff) had attended at least one SRT.

Other Categorical Services. With regard to resources, Logan uses its SIP funding primarily for aides and a program coordinator; its economic impact aid funds primarily for aides, and the \$1,600 in GATE funds are used primarily to help fund one preparation period each day for a teacher to coordinate an honors program. Logan has included within school-based program coordination the SIP funds, the GATE funds, and the three resource specialist programs. The EIA funds are insufficient to be allowed to be coordinated under the provisions of AB 777.

Special Education Services. The resource specialists at the school are at the maximum special education caseload allowed under law, so the implementation of the coordinated program has had little impact on their recorded caseloads. One difference, however, is that while a regular classroom teacher previously might have sent two special education pupils to the resource room, the regular teacher now may send four pupils who are having the same difficulty--of whom only two are special education pupils. The other two pupils would be with the resource specialist temporarily (until work on that concept was completed) and are not considered to be special education pupils. Since the placement of these pupils in the resource room is temporary, the school does not consider them to be part of the resource specialist caseload. Both regular teachers and the resource specialist felt that this flexibility was resulting in improved service for students.

There also was more flexible use of resource specialist aides. These aides were sometimes assigned to regular classrooms with identified special education pupils. Once in the classroom the aides will help other pupils who need assistance. The staff felt that this approach better met student needs and reduced the visibility of the special education pupils as "special" students.

School Planning. The School Site Council actively discussed the decision to implement under the provisions of the School-Based Program Coordination Act. Indeed, the final vote by the council included two negative votes. The concerns expressed at the time of the discussion were that the program would result in the diminution of special education services and services to the gifted and talented. At both the fall and spring interviews, the member who had voted "no" because of the fear concerning special education services said that he would now vote in favor of implementation under AB 777.

There was no change in the composition of the school site council upon implementation of AB 777. At the time of the decision to enter the program, the Council included the chairperson of the school's special education department, a parent of a special education pupil, and the teacher for the gifted and talented program.

**Mammoth High School
Mammoth Unified School District**

Population Description. Mammoth High School has a current enrollment of 375 students in grades 7-12. Due to an earthquake a few years ago, the elementary school facility was severely damaged. As a result, the elementary school is now sharing the same site as the high school.

Resources. The total consolidated application budget is \$62,860, of which \$26,657 is School Improvement Program (SIP) funding and \$36,203 comes from special education and some Chapter 1 funds. The funds are spent for a counselor, resource specialist, resource specialist aide, and for instructional materials and computers.

Conversion to AB 777. The conversion to school based coordinated programs did not represent a major change at the school, but provided the school with a vehicle to continue implementing a program which had previously only been allowed under waivers. It was indicated by school staff that for a number of years, the school had requested waivers so that the resource specialist program could be extended to students who were not enrolled in special education but had similar needs. The school had considered it critical to provide resource specialist support to approximately 12-14 students annually who would otherwise not receive the necessary skills to insure high school graduation.

Pupil Referral and Review Procedures. The process for screening and designating services for students is the Child Study Team (CST). The purpose of the child study team is to focus attention and share information on students who are having difficulty academically, behaviorally, or in attendance. The CST meetings are attended by the principal, nurse, psychologist, the counselor assigned to the student, and the study skills and work experience teachers as required. Parents may also be invited.

Meetings are scheduled as needed. Records are kept and recommendations for program changes, further screening, and progress are monitored. The programs of special education students are monitored twice a year. The child study team process may be initiated by teachers, parents, or the students themselves.

Other Categorical Services. The categorically funded specialist staff consists of a counselor who has the major responsibility for screening and scheduling all students into classes. Based upon assessment data and teacher input, students are assigned to regular classrooms for their basic subjects, or some of the basic subjects may be taught by the resource specialist if the student is in the resource specialist program.

Special Education Services. The resource specialist and a resource specialist aide are the full-time special education staff provided at the school site. The resource specialist is providing support to students in the areas of mathematics, social studies, and English, and some students attend the resource program for these subject areas in lieu of going to other teachers. Students are integrated in these subject areas into selected regular classrooms during the phase-out from the resource specialist program.

The resource specialist is serving approximately 12 students who are not enrolled in special education. Individualized education programs are written for regular and special education students served.

The procedural safeguards for special education appear to be maintained. If parents request screening for special education services, or if other interventions fail, the formal screening process for special education is initiated with required parent involvement and timelines being observed.

School Planning. The school site council is aware of the decision to implement the school-based coordinated program, but does not perceive the decision as a major change. There was no change in the composition of the site council at the time of AB 777 implementation.

Chapter 3. Conclusions and Recommendations

Although relatively few schools chose to include special education within school-based coordinated programs under AB 777, the schools that did make that decision have provided a number of different models.

The substantial drop from the number of schools operating under AB 777 (950 schools reported doing so) to the number that included special education (56 schools reported the inclusion of special education) indicates that one or more factors impacted on the decisions made at the local level and that those factors tended to discourage the inclusion of special education in the coordinated program.

Staff at the schools participating in the program were overwhelmingly positive in their comments about the coordinated effort and their ability to serve students who needed assistance. Common comments also included strong perceived successes in integrating special education pupils with the regular program and reducing the separate identification of students based on program "labels".

With regard to prior concerns that had been expressed about the inclusion of special education in coordinated programs, no evidence was found that the procedural safeguards for pupils or parents had been reduced or neglected. There was considerable evidence, however, that the workload for resource specialists was greater than the legally allowed special education caseload. This latter fact creates a dilemma in that the resource specialists themselves felt that the services they were providing were more effective than a more narrowly defined role for resource specialists would permit.

Recommendations to Local Schools

It is recommended that local schools considering the inclusion of special education in a coordinated program under the provisions of the School-Based Program Coordination Act:

1. Insure that appropriate staff are familiar with the flexibility provided by the Act. Although it is not required that a school make full use of such flexibility, it was clear that staff at many of the schools were not fully aware of the options open to them.
2. Consider the use of a child study team or similar coordinating process. School staff comments regarding this process were excellent at all the schools that operated such a team, and several staff members felt that complicated mixes of categorical staff and large enrollments could not be adequately coordinated without a team such as the child study team. It should also be emphasized that some schools with staffs that worked well on an informal basis were accomplishing much the same objectives as those of a child study team without establishing a formal procedure.
3. Include in the school plan and in the deliberations of the school site council discussion of categorical programs that are included in the coordinated program. The apparent Legislative strategy of releasing such programs from some

of the legal requirements was achieved, but the attempted shift to a process controlled by the school plan did not appear to have been accomplished.

Recommendations for State Administration

An obvious lack of state guidance for the schools included in the study was noted. To some extent this may reflect a conscious state policy of allowing local schools and districts to develop alternative programs under the School-Based Program Coordination Act. However, there are a number of areas where the state should now consider the option of providing direction or guidance:

1. Participation in the Program. In the opinion of staff conducting this study, the knowledge level of local special education staff was much lower than among consolidated application staff. This is not surprising given the fact that School-Based Coordination was administered through the state's consolidated programs division and the instructions for applying were distributed through the School Planning Manual for consolidated programs. A stronger effort should be made to inform local special education staff of the School-Based Program Coordination Act and of the options available under that Act.

2. Decision-making at the local level. It was evident from the study that a number of schools entered the School-Based Program Coordination Act without a full realization of the degree to which they had shifted from the traditional legal requirements. One factor possibly was that the state made it extremely simple for a school to choose to operate under that Act. In fact, all that was required was that a small box on the application be checked. The State Department may wish to consider an alternative mechanism which retains the simplicity of checking the box, but better highlights the significance of the choice being made by the school.

The State Department may also wish to consider revising the Planning Manual to emphasize the importance of including all coordinated programs in the school plan. Several examples were found of schools coordinating special education or gifted and talented education, and yet not describing the program, the staff, or the funding in the school plan.

3. Identification, Referral and Assessment. The State Department may want to provide additional information to schools on the concept of child study teams. At all schools visited variations were observed in the way the concept was administered, but school staff comments about the process were overwhelmingly positive. It would appear that this area could be a constructive topic for technical assistance and staff development activities by the State Department of Education.

4. Special Education Services. There are several issues concerning special education which warrant further consideration by the State Department of Education.

(a) Inclusion of special education staff in the school plan description of resources. As is evident from the description of the schools in the study, the resource specialist program was often central to the coordinated program. Nonetheless, most of the school plans did not include the resource specialist or aide in the description of resources under the provisions of the school plan. It

appeared that this tended to discourage review of the role of the resource specialist by the school site council, and certainly did not provide a fully accurate description of supplemental resources at the school.

(b) Reconsideration of caseload maximums for resource specialists. It appeared that the caseload maximums for resource specialists operating under a School-Based Coordinated Program were of questionable usefulness. How, for example, does one calculate the caseload equivalent of coordinating the Gifted and Talented Program, coaching five regular teachers, or managing an extensive referral and service model for both special education and "regular" education pupils? An alternative might be to amend the Education Code to allow the school site plan to supercede the provisions of the Education Code on this issue. Certainly this would also help encourage the integration of special education into the school plan.

(c) Consideration of allowing special class personnel to participate under the School-Based Program Coordination Act. This option was being pursued at only one school in the study, but staff at that school felt the program was very effective.

(d) Guidance to schools on possible roles for designated instruction and services personnel within coordinated school programs. None of the schools in the study had included such staff in their coordinated programs.

5. Compensatory Education. The State Department of Education should make a consistent determination on the inclusion of special education and Miller-Unruh staff costs in the calculation for including economic impact aid under the School-Based Program Coordination Act. Schools in different parts of the state had made different interpretations of this provision and were acting under the assumption that their approach had been approved by the state.

6. Small School Programs. The concept of the School-Based Program Coordination Act did not appear entirely workable for very small schools that had only part-time resource staff. This was apparently due to the fact that such itinerant staff do not have time to participate in many school activities and thus are not very familiar either with the students or staff at the school. The State Department may wish to assign staff or initiate a study to look at alternative models for providing categorical resources to small schools.

7. Accounting. Schools participating under the School-Based Program Coordination Act are still required to account for expenditures by specific funding source (for example, the purchase of supplies must be charged to one or more separate funding sources). An alternative would be to allow those schools to transfer coordinated funding sources into a single account, and apply all coordinated program charges against this account. For example, an aide who is funded from three funding sources would have his or her salary costs charged against a single coordinated programs account, rather than allocated out against three separate accounts. The schools that participated in the study felt that a change in this accounting practice could reduce paperwork at the local level and further strengthen the concept of program coordination.

APPENDIX I

Selection of Study Sample

Based on the variables described in Chapter 1, Method of Study, the study sample was selected according to the following criteria.

Since there were only three schools serving grades 9-12, all three schools were selected for the project sample. Two of the schools are comprehensive high schools, and one is a continuation high school.

Of the forty-six schools, 11 are in an urban setting, all of which are located in New Haven Unified School District. By virtue of the decision to include all high schools (two of which are in New Haven), two of those eleven urban schools had already been selected for the sample. It was decided to include one of the elementary schools in order to have information on the effect of school-based program coordination across grade levels in a district that has a number of different schools participating in the program (New Haven is the only such district in the state in 1982-83).

Only three of the schools were located in suburban settings, so it was decided to include two of the schools in the sample. The three schools were located in two school districts, so it was decided to include one school from each district. In early fall, 1982, however, one of the school districts decided not to include special education in its school-based coordinated program. This district included two of the schools, so the available population dropped to one school. That school was included in the sample.

Since all the remaining schools to be selected necessarily had to come out of the rural elementary school grouping, the final seven schools were selected on the basis of geography, program mix, and type of district.

Population of Rural Elementary Schools
(Schools selected are in parentheses)

	<u>North</u>		<u>South</u>		<u>Mountain*</u>	
	One	Multi	One	Multi	One	Multi
Spec ED only						1
SIP only	2					2(1)
SIP/GATE						1
SIP/EIA	8(1)	2	1	1(1)	1	
SIP/GATE/EIA					1(1)	1(1)
SIP/EIA/551	8(2)					
SIP/GATE/OT/EIA		1				
SIP/GATE/OT/EIA/M-U		1				
	18(3)	4	1	1(1)	2(1)	5(2)

Notes: "one" means a one-school school district; "Multi" means the school is in a multi-school school district.

SIP= School Improvement Program
 GATE= Gifted and Talented Program
 EIA= Economic Impact Aid
 M-U= Miller-Unruh
 551= AB 551 Staff Development
 OT= Other

* The one school located in the valley was included in the "Mountain" column for the purpose of condensing the table.

As has been indicated, late in the fall one of the suburban school districts decided not to include special education within its school-based coordinated program. This left the sample one school short, since a school in that district had previously been included. It was decided to replace that school with another located in southern California, although it was not possible to find another suburban school (the one remaining school had already been selected). The replacement school is reflected in the table above.

One of the other schools included in the sample, a small rural school in a one-school school district in Northern California, decided not to implement the program in the fall due to the extended illness of a key staff member. This school was retained in the sample, but the fall visit was eliminated for that school. In the spring, however, additional problems of staff illnesses resulted in the school deciding not to implement the program under the School-Based Program Coordination Act in 1982-83. Another small rural Northern California school in a one-school school district was selected and visited in spring, 1983. That replacement school is reflected in the above table.

In summary, the final sample for the project consisted of the following twelve schools:

<u>District</u>	<u>School</u>	<u>Grades</u>	<u>Comments</u>
New Haven USD	Alvarado Elem	K-4	Urban, north, SIP/GATE/M-U
New Haven USD	El Rancho HS	9-12	Urban, north, Continuation High, no SIP, GATE only
New Haven USD	James Logan HS	9-12	Urban, north, SIP/GATE
Saddleback USD	O'Neill Elem	K-6	Suburban, south, SIP only
Buckeye Elementary	Buckeye Elem	K-5	Rural, mountain, SIP/GATE/EIA
Gold Oak Elem	Gold Oak Elem	K-8	Rural, mountain, SIP/GATE/EIA
Mammoth USD	Mammoth Elem	K-6	Rural, mountain, SIP only
Mammoth USD	Mammoth HS	7-12	Rural, mountain, SIP only, the two schools comprise the entire district
Beaumont USD	Wellwood/Palm El	K-3	Rural, south, SIP/EIA
Wilmar Elem	Wilson Elem	K-6	Rural, north, SIP/EIA, one-school district
Lassen View E	Lassen View El	K-8	Rural north, SIP/EIA/551 one-school district
Reeds Creek E	Reeds Creek El	K-8	Rural, north, SIP/EIA/551 one-school district, small school (79 ADA)

APPENDIX II

PROTOCOL FOR CONDUCTING INTERVIEWS

Interviews are used as part of the study process to find out information that is not observable, such as feelings, thoughts, intentions, past and future activities and to verify prior information. The need to conduct interviews is apparent in this study.

Examples of interviews include asking questions of students, teachers, aides, school site councils/committees, support personnel, etc., and may be scheduled with the principal in advance of the site visit, or may occur incidentally during observations. Interviews serve the purposes of:

- Verifying and clarifying data
- Collecting new information
- Providing the opportunity for all involved to share experiences, realities and plans that are not easily observable
- Giving people an opportunity to ask questions
- Providing researchers an opportunity to ascertain individual and group perspectives on programmatic issues
- Enabling the reviewers to learn about the development of the program

Interviews with teachers, aides and other adults in the classrooms would center around such issues as:

- Use of instructional materials and resources
- Instructional strategies
- How adults collaborate to serve student needs
- Changes due to school-based coordination of program
 - population served
 - outcomes
 - needs

Interviews with students would be conducted whenever appropriate and would involve such issues as:

- Which adults provide needed assistance
- Groups or program options with which involved

Interviews with students con't:

- Perception of program
- Changes in program or activities

The groups and issues to be addresses through interviews are:

Principal

- School history, description of school and community
- Staffing, changes in duties and roles due to school-based coordination
- Description of program options
- Participation of staff and community in needs assessment, implementation, evaluation, and ongoing planning and evaluation efforts
- Development and modification of school plan
- Process for identifying students for various program options
- Staff development effort, changes due to school-based coordination
- Changes in policies and procedures due to school-based coordination
- Parent involvement, change in Special Education parent involvement due to school-based coordination
- Projected and actual outcomes of school-based coordination

School Site Council

- Composition/Membership
- Awareness, involvement and implementation of school-based coordination
- Process and rationale for implementing school-based coordination
- In-service training received, planned or needed
- Participation of Special Education parents and staff
- How involved in program planning, needs assessment, plan development, and program monitoring
- Observed and projected outcomes of school-based coordination
- Perceptions of program

Aides/Volunteers - (regular and Special Education)

- Duties/roles and any changes due to school-based coordination
- Population served including changes
- Staff development needs
- Planning and articulation between regular and Special Education staff
- Involvement in program planning and monitoring efforts
- Changes due to school-based coordination
- Perceptions of program

Special Project Coordination

- Funding sources
- Roles and responsibilities/changes due to school-based coordination
- Needs of various student populations served
- Articulations and coordination between Special Education and non-Special Education
- Involvement in program planning and monitoring efforts
- Staff development and changes due to school-based coordination
- Resources utilized or needed to implement or improve program
- Changes due to school-based coordination

Teachers - (regular and Special Education)

- Involvement in planning, implementing and evaluating program
- Student needs, how being addressed by school-based coordination
- Curriculum/program changes resulting from school-based coordination
- Changes in roles and duties
- Changes in population served
- Staff development needs and changes due to school-based coordination
- Services and resources utilized and needed
- Changes in planning between Special Education and regular Education

- Other outcomes

Special Education Parents

- Awareness and involvement in school-based coordination
- Participation on school site council
- Observed or projected changes due to school-based coordination
- Modification of program to include Special Education needs
- Perception of least restrictive environment
- Involvement in program planning and monitoring

Special Education District/Region Staff

- Involvement in school-based coordination program
- Advantages/disadvantages of school-based coordination for Special Education students
- Services requested and utilized in response to school-based coordination needs
- Changes in policies and procedures relative to student participation in program options
- Significant changes in duties and caseloads of Special Education staff
- Support to school site council
- Actual and projected outcomes of school-based coordination
- Changes
- Participation of special education parents