

February 12, 2021

DR. KAREN BARBER, SUPERINTENDENT

**SANTA ROSA COUNTY SCHOOL DISTRICT
6032 HWY 90, MILTON, FL 32570**

It is my pleasure to submit the Final Report for the Review of the Exceptional Student Department. You have an outstanding, motivated and cooperative District Leadership Team and administrative staff; it was a joy to work with all of them!

I trust you will find that the Review provides comprehensive recommendations for addressing critical facets of the Exceptional Student Education Department such as organizational structure, budgets and staffing. Commendations to Debbie Anderson-Bagley for her willingness to collaborate and create proposed programmatic changes.

Please do not hesitate to contact me for clarification or additional information. I thank you for the opportunity to once again work with Santa Rosa County and look forward to the possibility of future endeavors.

Sincerely,

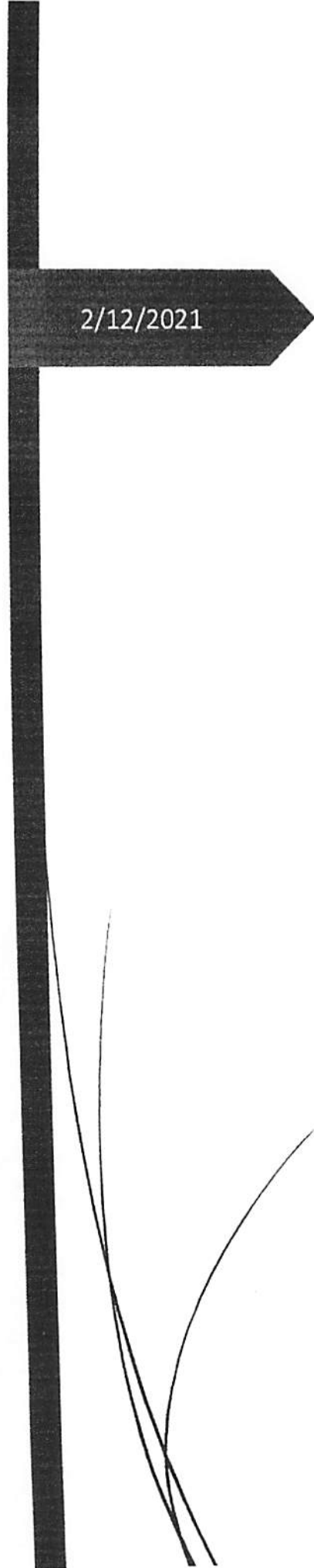
A handwritten signature in black ink, appearing to read "Bambi J. Lockman". The signature is fluid and cursive, with the first name "Bambi" being more prominent.

Bambi J. Lockman, LL.D.

Mag7 Consulting, LLC

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(850) 293-3670



2/12/2021

Santa Rosa County School Board

Exceptional Student Education Department Review

Bambi J. Lockman, LL.D.
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Exceptional Student Education Department Review
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Mag7 Consulting, LLC fulfilled its responsibilities by conducting the following:

- On-site analysis of current Departmental structure, district/school-based staffing and policies and procedures
- District Leadership Team Interviews: Superintendent, Assistant Superintendent of Curriculum, Instruction & Assessment, Finance, Human Resources, Medicaid, Director of Exceptional Student Education (ESE), and Director of Student Services
- Analysis of programmatic service delivery, teacher/student ratios and personnel caseloads
- Review of IDEA Grant, Part B/C, expense reports and Medicaid
- Review of ESE Department contracts
- Final report with recommendations and potential cost savings

The following data were reviewed and serve as the basis of recommendations for Santa Rosa County Exceptional Student Education Department:

**Special Education documents/data including 504
Interviews with District staff
Contracts and grants
Policies and procedures**

**Special education structure
Staffing allocations and projections
District reports/process
State/district comparison reports**

This report is based upon interviews and information received by the following individuals:

**Dr. Karen Barber
Susan McCole
David Gunter**

**Mike Thorpe
Elizabeth West
Robby Shell**

**Michele Barlow
Debra Ray
Debbie Anderson-Bagley**

FINANCE

FINDINGS:

It is evident that collaboration and coordination between the ESE Department and Finance Department should be maximized in order to ensure budgetary accuracy for the development/expenditures of the IDEA Grants, overall monitoring of expense reporting and reduction of additional general revenue requests.

RECOMMENDATIONS:

- Initiate comprehensive finance training for the ESE department regarding development of IDEA grants (i.e., roll forward, proportionate share, etc.), encumbrance of contract services, overall processes and procedures, interpretation of expenditure reports, FEFP, budget coding, and budgetary adjustments to establish a foundation of quality financial stewardship
- ESE Director should request monthly expense reports and establish monthly or bi-monthly meetings with Finance
- ESE Budget staff should work collaboratively with Finance (i.e., Bookkeeper and Contract Management)
- Reduce IDEA roll-forward
- Establish Project 199, emergency set aside (\$300,000-\$500,000), and develop guidelines for accessing budgetary resources; readdress Project 105 ESE Application Allocation and consolidate Projects where feasible
- Minimize the 504 and Adaptive PE budget allocations
- Establish reinforceable guidelines/timelines to eliminate delinquent submission of travel and payroll
- Include finance in budgetary staffing allocation decisions
- Re-evaluate the creation of additional School numbers for specific programs (i.e., Home Education, Hospital Homebound, PreK-12 and PreK PDC, Santa Rosa Online Virtual Instruction Program, Santa Rosa Virtual Franchise, Santa Rosa Virtual Instruction Course Offerings, and Student Transition)

HUMAN RESOURCES (HR)

FINDINGS:

Increase collaboration and coordination between the ESE Department and Human Resources Department to ensure the accuracy of personnel status, accountability of staff schedules/assignments and cost-effective sound service delivery as it relates to master schedules and district budgets.

RECOMMENDATIONS:

- Culminate the HR review of Master Schedules identifying concerns related to ESE personnel assignments and schedules (1200 min. a day vs. 1500 min. a day) and coordinate efforts with ESE Director to rectify inefficiencies
- Provide comprehensive training for school-based administrators on the development of a Master Schedule with an *inclusive* approach. Emphasis should be placed upon identifying ESE needs, articulation, transition, community and the population of intensive students (i.e., staff ESE students with specialized needs including 254/255, intensive and reading endorsed Tier 3 then general education, etc.)
- Consider involving the Florida Inclusion Network (FIN) in the Master Schedule training
- Establish periodic meetings with HR to address staffing/personnel concerns, include finance as warranted

MEDICAID

FINDINGS:

Santa Rosa is to be commended for their efforts to bill Medicaid (Fee for Service, Administrative Claiming and Transportation).

RECOMMENDATIONS:

- Hire an outside consultant to review the current Medicaid billing to ensure the district is receiving the maximum allowable benefits.
 - Consultant(s): Tom Mc Dowell & Todd Zoellick
tmsdowell@camachievement.com
 - Medicaid documentation for services rendered should be submitted to the District by Camelot; add Medicaid expectations to contract revisions**
 - Provide ongoing PD for administrators, therapists and transportation

GRANTS AND CONTRACTS

FINDINGS:

Grant and Contract reviews identified the need to renegotiate, revise and/or establish protocols for monitoring.

RECOMMENDATIONS:

- **IDEA:**
 - PART B, K-12 Entitlement:** The 2021-22 Grant submission should include additional Instructional Models within the *Benefits to Nondisabled* section; review and revise budget descriptions
 - PART B, Preschool Entitlement:** Revise responses within this grant to address the Preschool population more specifically
 - To ensure budgetary accuracy, prior to submission and School Board approval, include the Finance Department in the grant development process and final review
- **Professional Services for Occupational and Physical Therapy:**
 - Continue to monitor therapists' caseloads, minutes per week (MPW) and potential student dismissals
 - NOTE: 30 MPW is a norm; investigate the decision-making process to verify individualized educational needs are being addressed
- **Speech and Language Therapy:**
 - Caseload average is comparable to other districts (Elem/MS: 60-65 student contact hrs. per SLP; HS: 40 student contact hrs. plus 70-100 consult students per SLP)
 - In lieu of the COVID, closely monitor billable hours for remote/drop-in services
- **Camelot Academy**
 - Collaborate with Purchasing to re-negotiate a financially responsible fee for service (i.e., administrative fee plus per pupil amount based upon FTE)
 - Readdress and/or collapse the behavioral aspect of this program
 - Reconsider number of units and disabled population to be served
 - Consider the addition of contract language in these areas: Camelot Academy's Right to Refusal, Dispute Resolution, Programmatic removal, Transition, Alignment to ESE guidelines and/or District Handbook
 - Establish a monitoring procedure to include but not limited to site visits, IEP/progress monitoring, attendance data and provision of Related Services
 - See Medicaid recommendation**
- **Learning Academy (Charter School Contract)**
 - Increase the involvement of the ESE Department
 - Increase program monitoring to ensure IEP implementation and appropriate related service delivery
 - Strongly encourage the entity to participate in District PD

STUDENT SERVICES

FINDINGS:

Increase collaboration and coordination between the Student Services and Exceptional Student Education departments.

RECOMMENDATIONS:

- Establish regularly scheduled meetings to address Indicator 11 (60-day timeline for evaluation), Multi-tiered System of Supports (MTSS) and Response to Intervention (Rti).
- Departments should share monitoring responsibilities and data regarding the timeline from evaluation to placement and collaboratively coordinate re-evaluations.

FINDINGS:

Section 504 placements have significantly increased districtwide (+481 students since 2016-17)

○ 2016-17	741
○ 2017-18	834
○ 2018-19	1018
○ 2019-20	1222 (Accellify- data confidence low)
○ 2020-21	1222 (FOCUS)

RECOMMENDATIONS:

- Study growth patterns by schools and consult with individual sites
- Transfer Section 504 to Student Services from Exceptional Student Education
 - Shift personnel from ESE to staff a 504 Liaison to support the infrastructure
- Provide customized Section 504 professional development for district and school-based personnel to re-educate, clarify processes and reduce district growth.
 - Consultant: **Julie J. Weatherly, Esq.**
Resolutions in Special Education, Inc.
6420 Tokeneak Trail
Mobile, AL 36695
Phone: 251-607-7377
Fax: 251-607-7288
Cell: 251-234-0387
Website: www.specialresolutions.com

FINDINGS:

The implementation and effectiveness of Multi-tiered Systems of Supports (MTSS) needs to be reviewed, reinforced and monitored closely districtwide.

RECOMMENDATIONS:

- Work collaboratively to support MTSS within the Student Services Department.
 - Coordinate behavioral and Tier III observations with the ESE Department
- Provide Professional Development to school-based and district personnel via Beth Hardcastle Hardcast@usf.edu at the Florida Problem Solving/Response to Intervention Project at the University of South Florida; floridarti.usf.edu

FINDINGS:

In order to enhance health programs and policies, assign Health and Physical Education (PE) to a Teacher on Special Assignment (TSA)

RECOMMENDATIONS:

- The TSA assignment should be split (.5 Health/.5 PE)
- Responsibilities should include professional development, Health Education and Policy implementation

EXCEPTIONAL STUDENT EDUCATION

FINDINGS:

Based upon a comprehensive review of affiliated programs/departments, interviews and documentation provided, it is evident that the Exceptional Student Education Department is overstaffed. (Attachment A: Proposed Organizational Chart)

RECOMMENDATIONS:

- Reduce the overall infrastructure of the ESE Department as follows:
 - Eliminate the Deputy Director position or one (1) Coordinator position through attrition
 - Eliminate Program Facilitator positions (17 to 11/12) and shift responsibilities
 - Transition - (shift responsibilities to Amanda Falling & Nicole Kinnard)
 - Pre-K - (shift responsibilities to Vanessa Avis & Tiffanie Coleman; reassign Diagnostician/Child Find PK)
 - 504 - (shift personnel to vacant Liaison position or Student Services)
 - Behavior General Education K-5 - (vacancy pending); move MTSS/Rti responsibilities to the Director for Continuous Improvement with support from Student Services and ESE
 - Assistive Technology (AT) - currently vacant and responsibilities shifted; consider supporting AT with a team to include a portion of an existing OT's caseload, and a portion of an SLP's caseload; assign oversight to the Program Facilitator for Sensory Impaired

**TOTAL REDUCTION: (6)* @ \$50,000 PER POSITION
ESTIMATED SAVINGS: \$250,000**

- BCBA position is currently listed as a Program Facilitator shift to Non-instructional School Related Employee*
- Eliminate three (3) Liaison positions; includes Gifted Liaison (shift responsibility to Gifted Program Facilitator); reduction from 20 to 17 Liaisons with an average caseload of 352 IEP's per year
(Attachment B: Total Number of Caseloads for ESE Liaisons)

**TOTAL REDUCTION: (3) @ \$50,000 PER POSITION
ESTIMATED SAVINGS: \$250,000**

FINDINGS:

Santa Rosa has a higher number of ESE teachers than like districts which attributes to increased General Revenue (GR) expenditures.

(Attachment C: Justification; Attachment D: ESE Staffing w/ Increased Staffing Formula)

RECOMMENDATIONS:

- Examine and re-evaluate classroom models and teacher/student ratios as described below:

- Hybrid: 2020-21 - Currently 54 students enrolled; begin dissolving units
2021-22 – Investigate other options to eliminate this service delivery model and reduce/reassign personnel for support
-Potential staff reduction: Eight (8) paraprofessionals

TOTAL REDUCTION: (8) @ \$25,000 PER POSITION
ESTIMATED SAVINGS: \$200,000

- ACCESS – Eliminate positions based upon the reduction of students on ACCESS Points
 - Eliminate two (2) teacher and three (3) paraprofessionals positions between King Middle School and Gulf Breeze High
 - Continue to monitor ACCESS placements at schools with increasing numbers

TOTAL REDUCTION: (2) @ \$50,000 PER POSITION
(3) @ \$25,000 PER POSITION
ESTIMATED SAVINGS: \$175,000

- Inclusion: Adjust teacher/student ratios to reduce inclusion staff by 31 teachers and 37 Paraprofessionals

Inclusion Staffing Formula	Current	Proposed
Primary	1:05	1:07
Intermediate	1:08	1:10
Middle	1:10	1:13
High	1:12	1:15

TOTAL REDUCTION: (31) @ \$50,000 PER POSITION
(37) @ \$25,000 PER POSITION
ESTIMATED SAVINGS: \$2,475,000

- Establish a process for handling ratio adjustment requests from School-based Administrators (i.e., conduct a site visit, review the Master Schedule, teacher/student minutes and options for flexible scheduling)
- As appropriate, eliminate Remote Learning positions based upon the reduction of service delivery needs (Current staff: ACCESS (6); Pre-K (4))

- Re-evaluate the function of Adaptive PE personnel to ensure services are received by students with IEP's in lieu of whole class services to provide teacher planning
 - Reduce Adaptive PE staff by two (2) positions

**TOTAL REDUCTION: (2) @ \$50,000 PER POSITION
ESTIMATED SAVINGS: \$100,000**

- Continue to monitor service delivery models (i.e., co-teaching, dual certification, etc.), student/teacher ratios and personnel utilization

FINDINGS:

ESE Pre-K teachers, paraprofessionals, and Teacher Assistants are currently assigned to the ESE Department in lieu of the School- base thus creating concerns regarding ownership, staffing and evaluations

RECOMMENDATIONS:

- Reassign all ESE Pre-K and affiliated personnel back to their assigned schools
- Responsibility for these classes should lie with the Administrator at the school-base
- ESE should be responsible for staffing, programmatic support, professional development and monitoring curriculum/instruction
- Collaborative hiring would be deemed beneficial

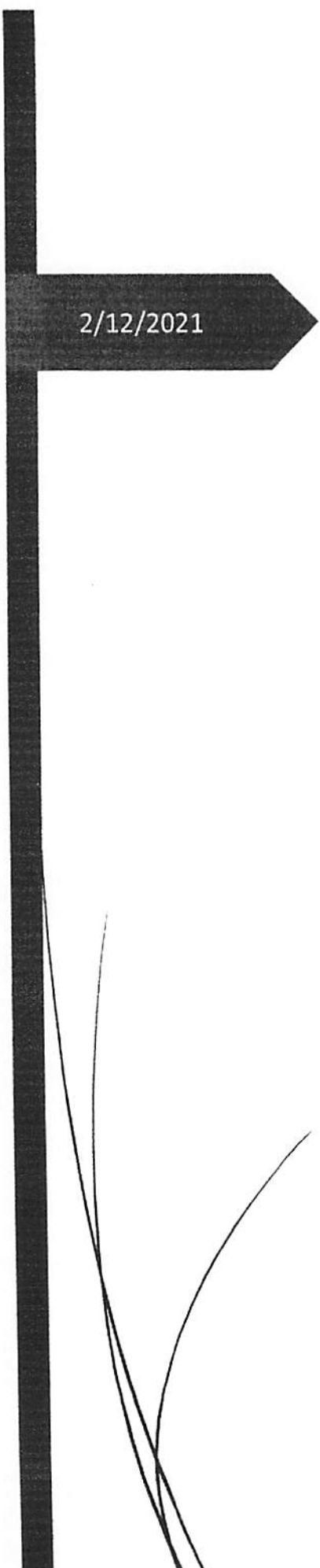
FINDINGS:

There are two levels of communication: social communication and instructional communication. In order to meet increasing programmatic demands, it is imperative to enhance data-based decision-making, ensure inclusive interdepartmental collaboration and plan effectively using instructional communication.

RECOMMENDATIONS:

- Initiate and establish regularly scheduled collaborative teaming with curriculum and instruction to ensure inclusive instructional decision-making
- Coordinate required annual administrative training in collaboration with the Continuous Improvement and Student Services Departments (i.e., Behavior/MTSS)
- Create robust paraprofessional training for paraprofessionals and coordinated paraprofessional training for teachers (i.e., how to work with your paraprofessional)
- Share progress monitoring between District Curriculum and Instruction departments to increase communication regarding instruction and student achievement thus prioritizing an inclusive approach to district decision-making.
- Collaborate with the Transportation Department to establish a decision tree for identifying students in need of special transportation; explore options for managing students on regular buses (i.e., headphones/music, computer access, peer support, etc.)

While the Reviewer recognizes annual shifts may lead to further financial reductions, it should be noted that the Recommendations and proposed Personnel changes could potentially save Santa Rosa County School Board \$3,450,000 and enhance revenue.



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