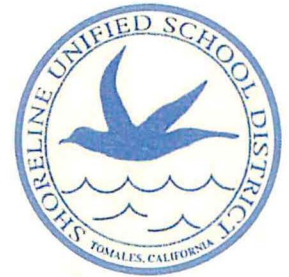


SHORELINE UNIFIED SCHOOL DISTRICT

P.O. Box 198 Tomales, California 94971 (707) 878-2266 FAX (707) 878-2554



August 15, 2024

The Honorable Judge Mark Talamantes
Marin County Superior Court
P.O. Box 4988
San Rafael, CA 94913-4988

Rod Kerr, Foreperson
Marin County Civil Grand Jury
3501 Civic Center Drive, Room #275
San Rafael, CA 94903

Re: Response to the Marin County Civil Grand Jury Report: *To Learn or Not to Learn: Are Children with Learning Differences Set Up for Success?*

Dear Judge Talamantes and Foreperson Kerr,

The Shoreline Unified School District has received the Marin County Civil Grand Jury Report *To Learn or Not to Learn: Are Children with Learning Differences Set Up for Success?* dated June 6, 2024. The Marin County Civil Grand Jury has requested a response to Findings 1-7 (F1-F7) and Recommendations 1-4 (R1-R4). Attached please find the provided *Response Form* and a detailed summary of the Shoreline Unified School District's responses.

Thank you for your interest in and support of the effective delivery of special education services in our public schools.

Sincerely,

Adam Jennings
Superintendent
Shoreline Unified School District

PDF file sent to CourtroomL@marin.courts.ca.gov and foreperson@MarinCivilGrandJury.org

RESPONSE FORM: 2023-2024 Marin Civil Grand Jury Report

Report Title: To Learn or Not to Learn: Are Children with Learning Differences Set Up for Success?

Respondent/Agency Name: Shoreline Unified School District

Submitter Name: Adam Jennings Title: Superintendent

FINDINGS

- Agree with the findings numbered: 5
- Disagree *partially* with the findings numbered: 1, 2, 3, 4, 6, 7
- Disagree *wholly* with the findings numbered: N/A

(Attach a **statement** specifying any portions of the findings that are disputed; include an explanation of the reasons therefor.)

RECOMMENDATIONS

- Recommendations numbered 1,2 have been implemented.
(Attach a **summary** describing the implemented actions.)
- Recommendations numbered N/A have not yet been implemented, but will be implemented in the future.
(Attach a **timeframe** for the implementation.)
- Recommendations numbered 3 require further analysis.
(Attach an **explanation** and the scope and parameters of an analysis or study, and a **timeframe** for the matter to be prepared for discussion by the officer or director of the agency or department being investigated or reviewed, including the governing body of the public agency when applicable. This **timeframe shall not exceed six months** from the date of publication of the grand jury report.)
- Recommendations numbered 4 will not be implemented because they are not warranted or are not reasonable.
(Attach an **explanation**.)

Date: 8-15-24 Signed: 

Number of pages attached: 4

District Response

FINDINGS

- F1:** Communication with parents and guardians regarding special education services and resources at every child's development stage is critical to identifying whether children have learning differences.

Response: Partially Agree

The Shoreline Unified School District agrees that communication with parents regarding the provision of special education services is critical; however, the initial communication with Shoreline Unified School District parents/guardians regarding special education services takes place when all general education interventions have been exhausted or the student is demonstrating acute educational needs that likely could not be addressed without the provision of special education support and services - and not before. The Shoreline Unified School District's communications with parents/guardians typically center on a child's present levels when compared to developmental milestones or age/grade level behavioral/academic expectations, not the provision of special education services -unless such discussions are warranted. The Shoreline Unified School District's approach is driven by Education Code section 56303, which states that "a pupil shall be referred for special educational instruction and services only after the resources of the regular education program have been considered and, where appropriate utilized."

To ensure that all parents and guardians are made aware of the availability of special education services, the Shoreline Unified School District provides annual notice regarding special education and the Child Find process to all families of children enrolled within the district (see the 2024-2025 Shoreline Unified School District's Annual Notice driven by California Education Code 56301 attached). Additionally, when general education supports are not successful in addressing a student's needs, and again consistent with California Education Code 56301, all children within the Shoreline Unified School District who are *or* may be in need of special education and related services, are identified, located, and assessed. It is at this time, when the "Child Find" process has been initiated and a student is suspected of having a disability, that specific communication related to special education services takes place.

Once the Child Find process is activated, Shoreline Unified School District parents/guardians receive a more explicit and lengthy communication that provides a full explanation of parent's special education rights within thirteen identified categories. That statement of rights, commonly referred to as "Procedural Safeguards," is provided to Shoreline Unified School District parents upon initial referral for special education services and at least annually thereafter if the child is receiving special education services (see sample Procedural Safeguards attached).

All of the activities above permit the Shoreline Unified School District to meet or exceed their Child Find obligations under state and federal law.

F2: Many school districts do not have sufficient information on their website to inform parents and guardians of their rights under federal and state laws to have their children assessed to determine whether they are entitled to special education services.

Response: Partially Agree

At the time the Grand Jury Report, *To Learn or Not to Learn: Are Children with Learning Differences Set Up for Success?*, was released, the Shoreline Unified School District did not have information about special education available on their website. With that said, there are currently no statutes, federal or state, that require school districts to post information on their website to inform parents/guardians of their rights under federal and/or state laws related to having their children assessed to determine special education eligibility. Although the Shoreline Unified School District website does serve an important function related to generalized one-way communication with our school community, the Shoreline Unified School District elects to communicate with families regarding the federal and state laws concerning special education in many other ways, such as in-person meetings, phone calls, student study teams meetings, and Individualized Education Program (IEP) meetings, etc.

F3: Each school district should have information on its website describing the services available for students with learning differences.

Response: Partially Agree

All parents/guardians should know what services are available to students with disabilities under the Individuals with Disabilities Education Act (IDEA). This is first accomplished by the Marin County Special Education Local Plan Area (SELPA) developing and adopting an annual special education service plan consistent with California Education Code 56205(b)(2). The plan (see attached Marin County SELPA 2024-2025 Service Plan) includes a description of special education services to be provided by the Shoreline Unified School District, including the nature of the services and the physical location at which the services will be provided. Additionally, the Marin County SELPA has a description of special education programming available within Marin County school districts consistent with the California Education Code 56361 requirement for a continuum of special education programming options to be available within each SELPA. This information is updated on an annual basis and can be accessed on the Marin County SELPA website (see <https://selpa.marinschools.org/about-selpa>).

It would be misleading to attempt to describe the specific special education services available under the IDEA on the Shoreline School District's website. Every student with an Individualized Education Program (IEP) is unique and the range of services available to a student is dependent on the identified needs of the student and the recommendation(s) of the IEP team. By design, IEP service delivery is something that cannot be meaningfully prepackaged into a list or description. More importantly, posting a listing of possible IEP services available to students removes the "Individualized" from the IEP.

F4: The Special Education Information System is a valuable tool that, when used consistently, will increase the likelihood that students with learning differences will have their Individualized Education Programs effectively administered, thereby increasing the chances of success for those students.

Response: Partially Agree

The Special Education Information System (SEIS) is a valuable tool that supports the Shoreline Unified School District with online access to develop Individualized Education Programs (IEPs), manage special education data, submit California Longitudinal Pupil Achievement Data System (CALPADS) reports, and track Individualized Education Program (IEP) service delivery. However, there are no findings in the report that suggest that the use of SEIS specifically or exclusively is connected to an increase in the effective administration of IEPs, or in student success.

F5: Many school districts do not use the Special Education Information System to track whether the district has provided the service hours required by Individualized Education Programs.

Response: Agree

F6: Data is not available electronically in Marin school districts to ascertain whether the districts are providing the service hours required by their students' Individualized Education Programs.

Response: Partially Agree

While digital Individualized Education Program (IEP) service delivery data may not be available across all school districts in Marin County, the Shoreline Unified School District is recording and tracking IEP service delivery on an individual student level. If a parent/guardian has a question regarding the delivery of services to their student, the parent/guardian may request records from the Shoreline Unified School District to help determine if special education services are being delivered at the frequency and duration indicated in the last agreed upon IEP. The Shoreline Unified School District will provide the requested information to the parent/guardian (electronically or otherwise) and work to address any reported discrepancies in service delivery, if needed.

F7: The co-teaching method can reduce the negative connotations of a special education class by including the resource specialist in the general education classroom to assist students with learning differences.

Response: Partially Agree

Co-teaching is one method of instruction to assist students with learning differences in the general education classroom that may work to reduce any negative connotations associated with special education service delivery.

RECOMMENDATIONS

R1: Each school district should inform parents and guardians at least annually about special education services and resources available to their students, such as Matrix and the Special Education Local Plan Area.

Response: The recommendation has been implemented

This recommendation has been implemented. The Shoreline Unified School District is currently providing notice to families annually about special education, including the facilitation of an annual Individualized Education Program (IEP) meeting with parents/guardians to discuss special education services.

R2: Each school district should develop and implement targeted communication strategies tailored to all parents and guardians regarding their student's rights concerning learning differences.

Response: The recommendation has been implemented

This recommendation has been implemented. The Shoreline Unified School District is currently using a variety of targeted communication methods with parents/guardians, including emails, website postings, phone calls, and in-person conferences.

R3: Each school district should use the Special Education Information System service tracking module to track every student's Individualized Education Programs allocated service hours and the hours provided to each student.

Response: The recommendation requires further analysis

There are no findings that suggest that the Shoreline Unified School District is not effectively tracking Individualized Education Program (IEP) service delivery. Further, the Shoreline Unified School District is using a service delivery tracking system consistent with the California Department of Education's guidelines (see attached). The Shoreline Unified School District will review the features available within the Special Education Information System (SEIS) service tracking module to determine if there will be any benefit over the district's current service tracking system. This analysis will take place in the fall of 2024.

R4: The Marin County Office of Education should analyze each school district's Individualized Education Programs compliance data and make the results available to the public in its annual report.

Response: The recommendation will not be implemented

As noted in this report on page 12, the California Department of Education is required to establish a rigorous data collection process and evaluation program for monitoring the delivery of special education services to students with Individualized Education Programs (IEPs). The responsibility for monitoring and analyzing service delivery rests with the California Department of Education.