

## COMMISSION ON STATE MANDATES

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July 11, 2013

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Ms. Jill Kanemasu  
State Controller's Office  
Division of Accounting and Reporting  
3301 C Street, Suite 700  
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*And Interested Parties and Affected State Agencies (See Mailing List)*

**RE: Final Staff Analysis and Proposed Statewide Cost Estimate, and Notice of Hearing Behavioral Intervention Plans, CSM-4464**  
Title 5, California Code of Regulations, Sections 3001 and 3052  
Butte County Office of Education, San Diego Unified School District, and  
San Joaquin County Office of Education, Claimants

Dear Ms. McDonough and Ms. Kanemasu:

The final staff analysis and proposed statewide cost estimate for this matter are enclosed.

### Hearing

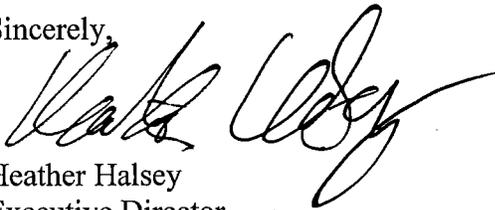
This matter is set for hearing on **Friday July 26, 2013**, at 10:00 a.m., in the State Capitol, Room 447, Sacramento, California. This matter is proposed for the Consent Calendar. Please let us know in advance if you object to this item being on consent and therefore you or a representative of your agency will testify at the hearing, and if other witnesses will appear. If you would like to request postponement of the hearing, please refer to section 1183.01(c)(2) of the Commission's regulations.

### Special Accommodations

For any special accommodations such as a sign language interpreter, an assistive listening device, materials in an alternative format, or any other accommodations, please contact the Commission Office at least five to seven *working* days prior to the meeting.

Please contact Heidi Palchik at (916) 323-3562 if you have any questions.

Sincerely,

  
Heather Halsey  
Executive Director

**ITEM 9**  
**FINAL STAFF ANALYSIS**  
**AND**  
**PROPOSED STATEWIDE COST ESTIMATE**

**\$1,008,923,805<sup>1</sup>**

**(Total For Fiscal Years 1993-1994 through 2011-2012 Only<sup>2</sup>)**

California Code of Regulations, Title 5, Sections 3001 and 3052  
Register 93, No. 17; Register 96, No. 8; Register 96, No. 32

*Behavioral Intervention Plans*

CSM-4464

Butte County Office of Education, San Diego Unified School District,  
San Joaquin County Office of Education, Claimants

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**STAFF ANALYSIS**

**Background and Summary of the Mandate**

The *Behavioral Intervention Plans (BIPs)* program provides special education services for children with disabilities. On September 28, 2000, the Commission on State Mandates (Commission) adopted its test claim statement of decision<sup>3</sup> finding that regulations in Title 5, California Code of Regulations, sections 3001 and 3052, which implement Education Code section 56523, impose a reimbursable state-mandated new program on school districts and special education local plan areas (SELPA) within the meaning of article XIII B, section 6 of the California Constitution and Government Code section 17514. The Commission approved this test claim for the following categories of reimbursable activities:

- SELPA plan requirements. (Cal. Code of Regs., tit. 5, §§ 3001 and 3052, subd. (j).)
- Development and implementation of behavioral intervention plans (BIPs). (Cal. Code of Regs., tit. 5, §§ 3001 and 3052, subds. (a), (c), (d), (e), and (f).)
- Functional analysis assessments. (Cal. Code of Regs., tit. 5, §§ 3001 and 3052, subds. (b), (c), and (f).)
- Modifications and contingent BIPs. (Cal. Code of Regs., tit. 5, § 3052, subds. (g) and (h).)

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<sup>1</sup> This figure has been revised from the draft staff analysis. For discussion see “Draft Staff Analysis and Proposed Statewide Cost Estimate” section on page 8.

<sup>2</sup> This statewide cost estimate is for fiscal years 1993-1994 through 2011-2012 only. Because there is not yet any claiming data for 2012-2013 and Commission staff has no evidence on which to base an estimate for 2012-2013 and forward, it is premature to estimate those future costs.

<sup>3</sup> Exhibit A.

- Development and implementation of emergency interventions. (Cal. Code of Regs., tit. 5, §§ 3001 and 3052, subd. (i).)
- Prohibited behavioral interventions. (Cal. Code of Regs., tit. 5, §§ 3001 and 3052, subd. (l).)
- Due process hearings. (Cal. Code of Regs., tit. 5, § 3052, subd. (m).)

The Commission adopted parameters and guidelines, including a reasonable reimbursement methodology (RRM), on April 19, 2013 and corrected the parameters and guidelines on April 29, 2013.<sup>4</sup>

Eligible claimants are required to file initial reimbursement claims for costs incurred for fiscal years 1993-1994 through 2011-2012 with the State Controller's Office (SCO) by November 21, 2013. Late initial claims may be filed until November 21, 2014, subject to a 10 percent penalty for late filing. Reimbursement claims for fiscal year 2012-2013 are due by February 18, 2014.

#### Eligible Claimants and Period of Reimbursement

School districts and county offices of education (COEs), as defined in Government Code section 17519, are eligible to claim reimbursement where specified below. SELPAs, whose sole constituents are school districts and COEs, are also eligible as specified below. Community colleges and charter schools are not eligible to claim reimbursement.

Government Code section 17557(e) states that a test claim shall be submitted on or before June 30 following a given fiscal year to establish eligibility for that fiscal year. The test claim was filed on September 28, 1994, establishing eligibility for reimbursement for the 1993-1994 fiscal year. Therefore, the costs incurred for compliance with the mandated activities are reimbursable on or after July 1, 1993.

#### **Reimbursable Activities**

The claimant is only allowed to claim and be reimbursed for increased costs for reimbursable activities identified below. Increased cost is limited to the cost of an activity that the claimant is required to incur as a result of the mandate.

For each eligible claimant that incurs increased costs, the following activities are reimbursable:

##### A. One-Time Activities - SELPA Only.

The direct and indirect costs of labor, materials and supplies, contracted services, equipment and other capital assets, travel, and training incurred for the following mandate components are eligible for reimbursement on a one-time basis:

1. Preparing and Providing SELPA Procedures and Initial Training.

Preparing procedures for the SELPA local plan regarding the systematic use of behavioral intervention, for the training of behavioral intervention case managers and personnel involved with implementing behavioral intervention plans, for special training for emergency interventions, and for identification of approved behavioral emergency procedures.

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<sup>4</sup> Exhibit B.

## B. On-Going Activities - SELPA Only.

The direct and indirect costs of labor, materials and supplies, contracted services, equipment and other capital assets, travel, and training incurred for the following mandate components are eligible for reimbursement on an on-going basis:

### 1. Training.

Providing and obtaining training in behavior analysis, positive behavioral interventions, and behavioral emergency interventions. Time spent by personnel who design and conduct the training and time spent by personnel who receive the training is reimbursable. Such personnel include behavioral intervention case managers and personnel involved with implementing behavioral intervention plans, conducting functional analysis assessments, or implementing emergency interventions.

### 2. Emergency Interventions.

Preparing reports on the number of Behavioral Emergency Reports to the California Department of Education (CDE) and Advisory committee on Special Education.

### 3. Due Process Hearings.

Preparing for, attending, and documenting and informing appropriate staff concerning the results of any mediation or due process hearing related to functional analysis assessments or the development or implementation of behavioral intervention plans.

## C. On-going Activities - School Districts and COEs Only.

The direct and indirect costs of labor, materials and supplies, contracted services, equipment and other capital assets, travel, and training incurred for the following mandate components are eligible for reimbursement on an on-going basis:

### 1. Conducting Functional Analysis Assessments.

Providing notice to and obtaining written consent from parents to conduct functional analysis assessments; conducting functional analysis assessments; preparing written reports of assessment results; providing copies of assessment reports to parents and the IEP Team; conducting IEP Team meetings to review assessment results.<sup>5</sup>

### 2. Developing and Evaluating BIPs.

Participating in IEP Team meetings in which BIPs are developed, evaluated, or modified, or in which functional analysis assessment results are reviewed; preparing BIPs; and developing contingency plans for altering the procedures or the frequency or duration of the procedures. Providing copies of SELPA procedures on behavioral interventions and behavioral emergency interventions to parents and staff.

### 3. Implementing BIPs.

Implementing and supervising the implementation of BIPs; measuring and documenting the frequency, duration, and intensity of targeted behavior and effectiveness of the BIP. Costs of employing personnel with documented training in behavioral analysis including positive

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<sup>5</sup> An IEP is an Individualized Education Program (Ed. Code § 56023 (Stats. 1993, ch. 1296 § 13.1 (AB 369))).

behavioral interventions (whether such personnel are new staff or existing staff) to serve as behavioral intervention case managers is reimbursable under this component.

4. Modifications to BIPs.

Providing notice to parents or parent representatives of the need to make minor modifications to the BIPs, meeting with parents to review existing program evaluation data; and developing minor modifications to BIPs with parents or parent representatives.

5. Emergency Interventions.

Employing emergency interventions; notifying parents and residential care providers after an emergency intervention is used; preparing and maintaining a Behavioral Emergency Report following the use of an emergency intervention; administrative review of Behavioral Emergency Reports; scheduling and conducting an IEP Team meeting to review a Behavioral Emergency Report and the need for a functional analysis assessment, interim BIP, or modification to an existing BIP.

6. Prohibited Interventions.

Training appropriate staff regarding the types of interventions that are prohibited under Title 5, California Code of Regulations section 3052(l).

7. Due Process Hearings.

Preparing for, attending, and documenting and informing appropriate staff concerning the results of any mediation or due process hearing related to functional analysis assessments or the development or implementation of BIPs.

## Statewide Cost Estimate

### Methodology

In lieu of filing detailed documentation of actual costs, the Commission adopted a reasonable reimbursement methodology (RRM) to reimburse claimants for all *direct* and *indirect* costs of the reimbursable activities as authorized by Government Code sections 17557(b) and 17518.5 for the initial claiming period, from July 1, 1993 to June 30, 2012 only. Beginning July 1, 2012, eligible claimants will be reimbursed based on actual costs.

### **RRM for Initial Claiming Period for Fiscal Years 1993-1994 through 2011-2012**

The statewide cost estimate for fiscal years 1993-1994 through 2011-2012 was developed by multiplying the average daily attendance (ADA) for a fiscal year by the relevant unit cost rate for that fiscal year as specified below.

The RRM for the mandated activities of the three uniform cost allowances is as follows:

A. RRM for One-time Activities - SELPA Only. See Table A.

The RRM for the one-time activities was calculated by multiplying the total number of SELPA ADA<sup>6</sup> for the fiscal year during which the one-time activities were performed<sup>7</sup> by the relevant unit cost rate for one-time SELPA activities for that fiscal year. The unit cost rate for one-time

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<sup>6</sup> Exhibit D. The California Department of Education provided the AB 602 ADA figures for fiscal years 2000-2001 through 2011-2012 on April 15, 2013.

<sup>7</sup> This could be as early as fiscal year 1993-1994, presumably the year implementation began.

SELPA activities is \$.32818 for FY 2006-2007. This unit cost rate was adjusted by the Implicit Price Deflator<sup>8</sup>.

**B. RRM for On-going Activities - SELPA Only. Training. See Table B.**

The RRM for the on-going activities was calculated by multiplying the total number of SELPA ADA<sup>9</sup> for each fiscal year by the relevant unit cost rate for on-going SELPA activities for that fiscal year. The unit cost rate for on-going SELPA activities is \$1.18702 for FY 2006-2007. This unit cost rate was adjusted for each prior and subsequent year by the Implicit Price Deflator<sup>10</sup>.

**C. RRM for On-going Activities - School Districts and COEs. See Table C.**

The RRM for the on-going activities was calculated by multiplying the total number of ADA<sup>11</sup> per fiscal year by the relevant unit cost rate for on-going school district and COE activities for the fiscal year. The unit cost rate for ongoing school district and COE activities is \$9.45701 for FY 2006-2007. This unit cost rate was adjusted for each prior and subsequent year by the Implicit Price Deflator<sup>12</sup>.

**Table A.**

<b>Fiscal Year</b>	<b>SELPA ADA</b>	<b>Unit Cost Rate</b>	<b>Total</b>
1993-1994 <sup>13</sup>	4,996,826.28	\$.21043	\$1,051,482.15
2006-2007	5,946,121.83	\$.32818	\$1,951,398.26
			<b>\$3,002,880.42<sup>14</sup></b>

<sup>8</sup> Exhibit E. The State Controller’s Office provided the implicit price deflator figures on May 10, 2013.

<sup>9</sup> Exhibit D. The California Department of Education provided the AB 602 ADA figures for fiscal years 2000-2001 through 2011-2012 on April 15, 2013.

<sup>10</sup> Exhibit E. The State Controller’s Office provided the implicit price deflator figures on May 10, 2013.

<sup>11</sup> Exhibit D. The California Department of Education provided the AB 602 ADA figures for fiscal years 2000-2001 through 2011-2012 on April 15, 2013.

<sup>12</sup> Exhibit E. The State Controller’s Office provided the implicit price deflator figures on May 10, 2013.

<sup>13</sup> Fiscal year 1993-1994 SELPA ADA was used in calculating the one-time approved activities of preparing and providing SELPA procedures and initial training, since it is the earliest fiscal year approved, presumably the year implementation began.

<sup>14</sup> Exhibit F. After discussion with SCO staff on July 1, 2013, Commission staff corrected the calculations in the draft staff analysis by multiplying the ADA by the unit cost rate only because the unit cost rate is already adjusted by the implicit price deflator as provided by the SCO. Therefore, the correct total estimated cost of this program is \$1,008,923,805.

**Table B.**

<b>Fiscal Year</b>	<b>SELPA ADA</b>	<b>Unit Cost Rate</b>	<b>Total</b>
1993-1994	4,996,826.28	\$.76111	\$3,803,134.45
1994-1995	5,066,787.65	\$.78428	\$3,973,780.22
1995-1996	5,186,506.91	\$.80229	\$4,161,082.63
1996-1997	5,324,764.77	\$.81844	\$4,358,000.48
1997-1998	5,433,232.03	\$.83140	\$4,517,189.11
1998-1999	5,544,042.47	\$.85051	\$4,715,263.56
1999-2000	5,646,023.79	\$.88730	\$5,009,716.91
2000-2001	5,692,781.37	\$.92299	\$5,254,380.28
2001-2002	5,810,582.57	\$.94035	\$5,463,981.32
2002-2003	5,905,086.14	\$.97505	\$5,757,754.24
2003-2004	5,958,790.88	\$1.00767	\$6,004,494.81
2004-2005	5,980,225.39	\$1.06434	\$6,364,993.09
2005-2006	5,957,997.13	\$1.13024	\$6,733,966.68
2006-2007	5,946,121.83	\$1.18702	\$7,058,165.53
2007-2008	5,941,511.88	\$1.25863	\$7,478,165.10
2008-2009	5,953,104.10	\$1.29048	\$7,682,361.78
2009-2010	5,929,190.37	\$1.29597	\$7,684,052.84
2010-2011	5,942,644.82	\$1.33748	\$7,948,168.59
2011-2012	5,961,297.40	\$1.37746	\$8,211,448.72
			<b>\$112,180,100.33<sup>15</sup></b>

**Table C.**

<b>Fiscal Year</b>	<b>School District and COE ADA</b>	<b>Unit Cost Rate</b>	<b>Total</b>
1993-1994	4,996,826.28	\$6.06376	\$30,299,555.32
1994-1995	5,066,787.65	\$6.24838	\$31,659,214.62
1995-1996	5,186,506.91	\$6.39188	\$33,151,529.79
1996-1997	5,324,764.77	\$6.52051	\$34,720,181.93
1997-1998	5,433,232.03	\$6.62376	\$35,988,424.99
1998-1999	5,544,042.47	\$6.77601	\$37,566,487.22
1999-2000	5,646,023.79	\$7.06913	\$39,912,476.15
2000-2001	5,692,781.37	\$7.35351	\$41,861,924.73
2001-2002	5,810,582.57	\$7.49176	\$43,531,490.07
2002-2003	5,905,086.14	\$7.76826	\$45,872,244.46
2003-2004	5,958,790.88	\$8.02813	\$47,837,947.83
2004-2005	5,980,225.39	\$8.47963	\$50,710,098.62
2005-2006	5,957,997.13	\$9.00463	\$53,649,559.70

<sup>15</sup> Exhibit F. After discussion with SCO staff on July 1, 2013, Commission staff corrected the calculations in the draft staff analysis by multiplying the ADA by the unit cost rate only because the unit cost rate is already adjusted by the implicit price deflator as provided by the SCO. Therefore, the correct total estimated cost of this program is \$1,008,923,805.

2006-2007	5,946,121.83	\$9.45701	\$56,232,533.61
2007-2008	5,941,511.88	\$10.02751	\$59,578,569.79
2008-2009	5,953,104.10	\$10.28126	\$61,205,411.06
2009-2010	5,929,190.37	\$10.32501	\$61,218,949.86
2010-2011	5,942,644.82	\$10.65576	\$63,323,396.97
2011-2012	5,961,297.40	\$10.97426	\$65,420,827.60
			<b>\$893,740,824.33<sup>16</sup></b>

Assumptions

- *The initial reimbursement claims may differ from the statewide cost estimate.*
  - This estimate assumes that every eligible district will submit a reimbursement claim for each eligible year. However, if a district chooses not to submit a reimbursement claim for any given year, the amount claimed will be less than estimated.
  - Fiscal years 2000-2001 through 2011-2012 ADA numbers are actual figures as provided by the Department of Education. Fiscal years 1993-1994 through 1999-2000 ADA numbers were not available. Commission staff estimated these figures based on a 94.87 percent average ADA of actual enrollment over the twelve-year period (2000-2001 through 2011-2012) that ADA figures were available. Therefore, if actual ADA numbers for fiscal years 1993-1994 through 1999-2000 differ from those estimated; the amount claimed will also differ.

**Actual Cost Claiming Applicable to Annual Claiming Period Beginning July 1, 2012**

Beginning July 1, 2012, eligible claimants will be reimbursed based on actual costs. Commission staff has no way of predicting how many eligible claimants will submit actual claims for the future or what the cost of those claims will be. Even the number of eligible claimants that submit actual costs has historically varied. For example, over the past two years, the number of school districts submitting actual claims, as discussed in previous SCEs, has ranged from 0.10-29.05 percent. However, Commission staff has made the following assumptions:

- *There may be several reasons that the amount claimed for fiscal year 2012-2013 and forward will likely vary significantly from initial claims including but not limited to:*
  - Beginning with fiscal year 2012-2013, eligible claimants will be reimbursed based on actual cost claims, which are more difficult and time-consuming for claimants to prepare, rather than the formulas included in the RRM. Therefore eligible claimants may not have supporting documentation to file a reimbursement claim. As a result, fewer claims may be filed when the claiming methodology is based on actual costs.
  - Eligible claimants could submit claims for actual costs that are higher than the annual estimates based on the RRM calculation. In the January 25, 2013

<sup>16</sup> Exhibit F. After discussion with SCO staff on July 1, 2013, Commission staff corrected the calculations in the draft staff analysis by multiplying the ADA by the unit cost rate only because the unit cost rate is already adjusted by the implicit price deflator as provided by the SCO. Therefore, the correct total estimated cost of this program is \$1,008,923,805.

Commission hearing transcript, claimant witness stated that the number of students with BIPs has dramatically increased over the last few years.<sup>17</sup> While the RRM calculations use ADA as a multiplier of the unit cost rate, which has fairly consistent growth, it does not account for the significant increase of BIPs students within the ADA. Therefore, the increase in BIPs students will likely correlate to an increase cost of actual claims beginning with fiscal year 2012-2013.

- The SCO may conduct audits on actual cost claims and may reduce any claims it deems to be excessive or unreasonable.

### **Draft Staff Analysis and Proposed Statewide Cost Estimate**

The draft staff analysis and proposed statewide cost estimate were issued on June 25, 2013.<sup>18</sup> No written comments were received. However, following a telephone conversation with SCO staff on July 1, 2013, Commission staff corrected the calculations in the draft staff analysis by multiplying the ADA by the unit cost rate only, because the unit cost rate is already adjusted by the implicit price deflator as provided by the SCO. Therefore, the correct total estimated cost of this program is \$1,008,923,805.

### **Staff Recommendation**

Staff recommends the Commission adopt the proposed statewide cost estimate of \$1,008,923,805 for fiscal years 1993-1994 through 2011-2012 for costs incurred in complying with the *Behavioral Intervention Plans (BIPs)* program.

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<sup>17</sup> Available on the Commission's website at <http://www.csm.ca.gov/hearing.shtml>, pages 60-62.

<sup>18</sup> Exhibit C.

## Commission on State Mandates

Original List Date: 10/13/1994  
Last Updated: 6/21/2013  
List Print Date: 07/10/2013  
Claim Number: 4464  
Issue: Behavioral Intervention Plans

### Mailing List

#### TO ALL PARTIES AND INTERESTED PARTIES:

Each commission mailing list is continuously updated as requests are received to include or remove any party or person on the mailing list. A current mailing list is provided with commission correspondence, and a copy of the current mailing list is available upon request at any time. Except as provided otherwise by commission rule, when a party or interested party files any written material with the commission concerning a claim, it shall simultaneously serve a copy of the written material on the parties and interested parties to the claim identified on the mailing list provided by the commission. However, this requirement may also be satisfied by electronically filing your documents. Please see <http://www.csm.ca.gov/dropbox.shtml> on the Commission's website for instructions on electronic filing. (Cal. Code Regs., tit. 2, § 1181.2.)

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