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September 5, 2024

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The Honorable Presiding Judge Bunmi Awoniyi  
Sacramento County Superior Court  
720 9<sup>th</sup> Street  
Sacramento, CA 95814

Re: Response to Sacramento County Grand Jury 2023-2024 Investigative Report titled,  
“*Sacramento City Unified School District Fails Its Most Vulnerable Students*”

Dear Presiding Judge Awoniyi:

**I. INTRODUCTION**

This response is being submitted on behalf of the Sacramento City Unified School District Board of Education (“Board”) pursuant to Penal Code sections 933 and 933.05 and in response to the Sacramento County Grand Jury 2023-2024 Investigative Report titled, “*Sacramento City Unified School District Fails Its Most Vulnerable Students*,” (“Report”) which the Sacramento City Unified School District (“District or “SCUSD”) received on June 17, 2024.

At the outset, the District respects the function of the Grand Jury to investigate and report on the operations of local government agencies, and the District has fully cooperated with the Grand Jury's requests, including production of documents and interviews with witnesses. The District recognizes that the Grand Jury plays an important role in ensuring that school districts provide the “appropriate education and support services required by law”<sup>1</sup> for students with special needs.

It is apparent that the Grand Jury spent an extensive amount of time and effort in preparing the Report. The District acknowledges the Grand Jury’s findings regarding the District’s shortcomings with regard to the District’s past practices in special education. After reviewing the Grand Jury’s Report, the District publicly acknowledged the valid concerns expressed in this Report about the District’s need to improve special education as an equal component of its District’s general education program.<sup>2</sup>

In actively addressing the Findings and Recommendations noted in the Report, the District has taken several steps to improve our special education services, including correcting systems that contribute to a disproportionately high number of students in general and Black and African American students, in particular, identified as having disabilities. As noted in the Report, a positive step in addressing this issue is [the legal settlement reached in May 2023 with the Black Parallel School Board](#) (“BPSB”) and the use of an independent

<sup>1</sup> 2023-2024 Grand Jury Investigation Report, Summary, p. 1.

<sup>2</sup> SCUSD 6/17/2024 Press Release: <https://www.scusd.edu/press-release/scusd-response-sacramento-county-grand-jury-report>.

monitor to develop an action plan with specific goals and timetables. In accordance with the BPSB Action Plan, which was finalized on August 23, 2024, the District is updating its board policies, procedures, and manuals; creating a committee on the effectiveness of fully segregated schools; establishing a framework and plan for developing fully inclusive schools based on feeder patterns; developing an infrastructure for adopting evidence-based practices and programs; and demonstrating a commitment to developing a district-wide MTSS framework. (See Exhibit A.) In addition, SCUSD has been approved by the California Department of Education (“CDE”) to continue implementing its 2022 Comprehensive Coordinated Early Intervening Services (“CCEIS”) Plan, which is designed to improve disproportionate representation of students with disabilities by race or ethnicity within a specific disability category. (See Exhibit B.) The SCUSD SELPA and Special Education Department is implementing a program review and design for emotional disturbance (“ED”) continuum, conducting a curricular audit across all special education programs, and publication of a preschool recommendations report. The SCUSD Academic Office is supporting inclusive practices and integration, the multi-tiered system of support (“MTSS”) design team, and establishment of a clear continuum of educational supports. Further, the SCUSD Local Control and Accountability Plan (“LCAP”) is available on SCUSD website and includes goals that focus on improving academic outcomes for all students, including those students with disabilities, climate and culture, and graduation rates. (<https://www.scusd.edu/local-control-and-accountability-plan-lcap-resources>.)

Further, as noted herein, the District is committed to working with fidelity in collaboration with the California Department of Education (CDE), California Collaborative for Educational Excellence (CCEE), Sacramento County Office of Education (SCOE), Black Parallel School Board (BPSB), our labor partners, and the community to address and rectify the concerns outlined in the Report. The District is deeply committed to providing the leadership and oversight necessary to ensure that our SCUSD students can access the special education services they need and deserve.<sup>3</sup>

In the Report, the Grand Jury requests that the Board reply to its Findings and Recommendations.<sup>4</sup> This response is prepared and submitted on behalf of SCUSD pursuant to Penal Code section 933, subsection (c).

## **II. RESPONSES TO FINDINGS**

The District has reviewed the Grand Jury’s Findings and provides the following responses to each of the Findings pursuant to Penal Code section 933 and 933.05.

### Finding F1

*The misperception that special education is separate from general education denies the student a chance to participate in a general education classroom. (R1)*

### SCUSD’s Response to Finding F1

The District agrees with the Grand Jury’s Finding F1 to the extent that federal and state laws require special education students to participate in a general education classroom with nondisabled peers to the maximum extent appropriate based on the student’s

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<sup>3</sup> SCUSD 6/17/2024 Press Release: <https://www.scusd.edu/press-release/scusd-response-sacramento-county-grand-jury-report>.

<sup>4</sup> 2023-2024 Grand Jury Investigation Report, p. 11.

individualized needs. Students who are eligible for special education are entitled to the rights and protections afforded under federal and state laws. To ensure that a misperception does not exist that special education is separate from general education, the District has an ongoing initiative to develop and implement a MTSS that addresses the needs of all students, including students with disabilities, with one goal being to ensure that students with disabilities are educated in general education classes to the maximum extent possible. Further, the District is working collaboratively with its labor partners, CDE, and the BPSB Independent Monitor to implement, sustain, and hold accountable these systems of support with fidelity.

### Finding F2

*The District has ignored repeated warnings and failed to implement recommendations to address the deficiencies of its special education programs. (R2, R3)*

### SCUSD's Response to Finding F2

The District agrees with the Grand Jury's Finding F2 to the extent that the District needs to continue implementing recommendations to improve its special education programs. The District acknowledges the need for improvement in its special education programs and has implemented recommendations to advance its special education programs. The District has obtained and reviewed recommendations for improving its special education programs that are documented in numerous reports, including but not limited to the following:

- Council of the Great City Schools audit, Improving Special Education Services in the Sacramento City Unified School District (2017);
- The California Community College Equity Assessment Lab report, The Capitol of Suspensions (2018);
- Experts Evaluation Report for Sacramento City School District Special Education, School Discipline, and Implicit Bias (compiled by experts from Sacramento State University, Epoch Education, and the University of Oregon) (2022); and
- The California Collaborative for Educational Excellence (CCEE) report, Systemic Instructional Review (2022).

After reviewing the above reports, the District has already implemented the following recommendations:

- Established a revised organizational structure for its Special Education Department;
- Begun the development of a broad system of MTSS framework;
- Establish a District MTSS leadership team;
- Developed a comprehensive professional learning plan;
- Implemented special ed data reviews;
- Developed a special ed procedure manual;
- Implemented consistent monitoring and accountability;
- Developed inclusive educational vision through MTSS;
- Established inter-departmental collaboration; and
- Developed an alternative dispute resolution process.

In addition, and in consideration of the recommendations from the above listed reports, the District is implementing the BPSB Action Plan (Exhibit A), CCEIS Action Plan (Exhibit

B), and LCAP (<https://www.scusd.edu/local-control-and-accountability-plan-lcap-resources>).

### Finding F3

*The District administration and the SCUSD Board of Education have failed to adopt a working plan with specific steps and measurable outcomes to guide special education, resulting in a lack of focus and effectiveness in the Special Education Department. (R2, R3)*

### SCUSD's Response to Finding F3

The District agrees with the Grand Jury's Finding F3 to the extent that adopting a working plan with specific steps and measurable outcomes to guide special education will provide SCUSD's Special Education Department with better focus and effectiveness. The District has adopted multiple plans to guide special education. For example, SCUSD's Special Education Department and SELPA are umbrellaed within the Academic Office of the District. The Special Education Department has been implementing initiatives set forth in the Academic Office including MTSS, antibias/antiracism practices, trauma informed practices, and a focus on literacy. In addition, the Special Education Department is working on implementing a number of activities to improve special education services. They include but are not limited to:

- Policy, procedure, and manuals being updated;
- Professional learning for administrators, teachers, and related services providers;
- Direct supports to students (ratios);
- Conducting audits of curriculum;
- Committees to define continuum, review data, and address effectiveness; and
- Communication to staff, families, and the community.

The District's ongoing efforts have also included development of a working plan to guide special education and improve the focus and effectiveness of its Special Education Department. The BPSB Action Plan (Exhibit A) was finalized on August 23, 2024, and includes specific steps and measurable outcomes to guide special education and includes an Independent Monitor to oversee compliance with fidelity.

### Finding F4

*The District unnecessarily places a significant number of students of color in special education. (R4)*

### SCUSD's Response to Finding F4

The District agrees with the Grand Jury's Finding F4 to the extent that the District is identified by CDE as Significantly Disproportionate. The District has been engaging in a CCEIS Action Plan (Exhibit B) to address disproportionality through:

- Professional Learning
- Data Analysis
- Continuous Improvement

In addition, the District is implementing the BPSB Action Plan (Exhibit A) and LCAP (<https://www.scusd.edu/local-control-and-accountability-plan-lcap-resources>) to address disproportionality.

#### Finding F5

*SCUSD fails all its students and their parents and guardians by not consistently performing early assessment of students to determine their learning needs and appropriate support. (R5, R6, R7)*

#### SCUSD's Response to Finding F5

The District agrees with the Grand Jury's Finding F5 to the extent that despite the District's efforts, consistent completion of timely initial assessments is still an area that needs improvement. One of the efforts made by the District to improve completion of initial assessments of students was initiated on February 3, 2020, when the District issued a written directive for SCUSD site administrators and special education staff to grant all requests from parents or guardians for their child to be assessed for special education, regardless of whether the student is in the student study team ("SST") process. The District is continuing to work on implementing a consistent initial evaluation process, which will include a review of pre-referral intervention supports, as well as the development of a comprehensive evaluation process checklist to be used when students are referred for assessment. In addition, as part of its MTSS, the District is implementing an early intervention support system to provide supports before identifying a disability, and ensure that an assessment is provided when a disability is suspected. Further, the BPSB Action Plan (Exhibit A) has been finalized, which identifies specific actions the District is taking to improve its child find and initial assessment procedures in Directives 7, 8, and 9, and which actions are being monitored by the Independent Monitor.

#### Finding F6

*Students' achievements and goals are not measured consistently because the District does not hold individual school personnel accountable for updating IEPs as mandated by state and federal laws. (R5, R6, R7)*

#### SCUSD's Response to Finding F6

The District agrees with the Grand Jury's Finding F6 to the extent that the District needs to improve its consistent measurement of student progress on IEP goals. The District acknowledges that it is responsible to ensure that special education students have an IEP that is updated at least annually and includes information about the student's present levels of performance and measurable goals. The District understands its responsibility to provide parents with progress reports on their student's IEP goals periodically as determined by the student's IEP. In order to ensure that its students have properly updated IEPs and progress reports on IEP goals, the District is actively providing opportunities for targeted professional learning to all of its staff focusing on IEP compliance and utilizes this foundational understanding to engage labor partners on evaluation processes.

#### Finding F7

*By not fully utilizing the district's tracking system (SEIS), services to special needs students are not accurately recorded and centrally documented. (R5, R6, R7)*

### SCUSD's Response to Finding F7

The District agrees with the Grand Jury's Finding F7 that it is not utilizing SEIS to track service delivery to special education students. Since there is no legal requirement that the District use SEIS to track service delivery, District staff have been tracking delivery of services to special needs students utilizing other methods. The District is in the process of migrating to use of the SEIS service tracker feature for students with IEPs and training staff in its implementation.

### Finding F8

*SCUSD fails to provide free and appropriate education due to its overreliance on placing special education students in 162 self-contained classrooms as opposed to placing them in the least restrictive environment. (R6, R7)*

### SCUSD's Response to Finding F8

The District agrees with the Grand Jury Finding F8 to the extent that CDE has determined that the District is not meeting the State targets for ensuring special education students are placed in the least restrictive environment ("LRE"). The District is taking significant steps to ensure that students are appropriately placed in the LRE and recognizes that a self-contained classroom is on the continuum of placement options for students with special needs. As part of the BPSB Action Plan (Exhibit A) that is being implemented by the District and monitored by an Independent Monitor, following is a list of some of the actions the District is implementing to address LRE:

- Reviewing and revising policies, procedures, and practices pertaining to LREs for special education students;
- Developing and implementing an LRE checklist in order to ensure that IEP teams consider the LRE analysis at every IEP meeting;
- Reviewing, analyzing, revising, and improving the procedural manual on LRE;
- Developing and improving an interactive professional development plan for key personnel regarding the LRE analysis and for teachers on inclusive practices; and
- Establishing a framework and plan for developing fully inclusive schools.

### Finding F9

*The District's failure to provide ongoing communication and outreach leaves parents/guardians uninformed and unengaged about the special education process and their student's progress. (R12, R13)*

### SCUSD's Response to Finding F9

The District agrees with the Grand Jury's Finding F9 to the extent that the District is continuously working to improve its communication and outreach to parents/guardians to ensure that they are informed and engaged in the special education process and their student's progress. The District has several communication strategies in place. For example, the SCUSD SELPA actively collaborates with its Community Action Committee ("CAC") to build strong community engagement opportunities. Further, the SCUSD SELPA website provides comprehensive and valuable information for parents and the community about special education including but not limited to information regarding parent resources, a parent handbook, the CAC, child find, and alternative dispute resolution processes, Warmline Family Resource Center, Procedural Safeguards, and

SCUSD Special Education Department. (<https://selpa.scusd.edu/>.) In addition, the District sends an annual notice to all families of enrolled students the provides detailed information about programs, protections, and special education.

### **III. RESPONSES TO RECOMMENDATIONS**

The District has reviewed the Grand Jury’s recommendations and provides the following responses to each recommendation pursuant to Penal Code section 933 and 933.05.

#### Recommendation R1

*The SCUSD Board should direct administrators, teachers, and staff to formally collaborate to develop a plan to ensure special education is included as an equal component of the general education program rather than being treated as a segregated entity by January 3, 2025 and a formal adoption by February 3, 2025. (F1)*

#### SCUSD’s Response to Recommendation R1

This recommendation is in the process of being implemented. On August 23, 2024, the District finalized development of the comprehensive BPSB Action Plan with an Independent Monitor and Plaintiffs in response to the settlement agreement reached in the *Black Parallel School Board v. SCUSD*. (Exhibit A.) In addition, the District has been approved by the California Department of Education to continue implementing its 2022 Comprehensive Coordinated Early Intervening Services (CCEIS) Plan as its CCEIS Action Plan. (Exhibit B.) The District is also actively implementing a multi-tiered system of support (“MTSS”) to support all students and is implementing its LCAP (<https://www.scusd.edu/local-control-and-accountability-plan-leap-resources>). The BPSB Action Plan along with the other plans listed demonstrate the District’s ongoing work towards implementation of a comprehensive special education plan. Directives 3, 4, an 5 of the BPSB Action Plan identify the actions and targets that the District is committed to implement with the goal of ensuring that special education students are placed in the least restrictive environment (“LRE”), along with monitoring of the actions and targets by the Independent Monitor. The District’s actions include review and revision of policies, procedures, and practices pertaining to the LRE for students with disabilities, with special attention to Black students with disabilities, address the placement of students with disabilities and Black students with disabilities in more restrictive placements through an LRE analysis process based on the four-prong test established by *SCUSD v. Rachel H.*; institutionalize new LRE practices within systems and through Professional Development (PD); devise a framework, standards, and plans for more inclusive education and for the closure, restructuring, or reconstituting of fully segregated school sites; and build capacity for more inclusion through staffing and evidence-based reading programs. In addition, the Independent Monitor will review perform monitoring activities to measure successful implementation of the District’s actions. These strategies incorporate notice to administrators, teachers and staff that special education is included as an equal component of the general education program.

#### Recommendation R2

*The SCUSD Board and the District Administration should independently review the numerous reports with recommendations to improve special education and implement a comprehensive special education plan by January 3, 2025. (F2, F3)*

#### SCUSD’s Response to Recommendation R2



This recommendation is in the process of being implemented. The District has reviewed numerous reports with recommendations to improve special education and implementation of a comprehensive special education plan. Significant reports reviewed by the District and the Independent Monitor in development of the BPSB Action Plan include but are not limited to:

- Council of the Great City Schools audit, Improving Special Education Services in the Sacramento City Unified School District (2017);
- The California Community College Equity Assessment Lab report, The Capitol of Suspensions (2018);
- Experts Evaluation Report for Sacramento City School District Special Education, School Discipline, and Implicit Bias (compiled by experts from Sacramento State University, Epoch Education, and the University of Oregon) (2022); and
- The California Collaborative for Educational Excellence (CCEE) report, Systemic Instructional Review (2022).

The District has implemented many of the recommendations contained in these reports. The recommendations in these reports were considered in the development of the BPSB Action Plan, which the District is committed to implementing.

### Recommendation R3

*SCUSD administration should provide quarterly updates to the SCUSD Board on the comprehensive special education implementation plan's progress by January 3, 2025. (F2, F3)*

### SCUSD's Response to Recommendation R3

This recommendation will be implemented by January 3, 2025.

### Recommendation R4

*SCUSD should take corrective action as recommended by CDE to reduce the number of students of color in special education by January 3, 2025. (F4)*

### SCUSD's Response to Recommendation R4

This recommendation is being implemented. The District has developed plans to address disproportionality in special education. The BPSB Action Plan includes actions the District is committed to taking to reduce the number of students of color in special education. Directives 7, 8, and 9 of the BPSB Action Plan specifically target over and under-identification of Black students to special education and timely referrals for special education assessments. The actions include improving the District's systems for special education identification and IEP reviewing practices, including but not limited to enhanced translation and interpretation services. The District will revise policies and procedures, develop a procedural manual, institutionalize new practices within systems and through professional develop, and build capacity for linguistic access in special education processes. In addition, the Independent Monitor will review perform monitoring activities to measure successful implementation of the District's actions. The District is also implementing a CCEIS Action Plan (Exhibit B) that was approved by CDE.

### Recommendation R5



*SCUSD should create and implement district-wide policies that identify and assess the learning needs of all students for early intervention services by January 3, 2025. (F5)*

SCUSD's Response to Recommendation R5

This recommendation is being implemented. The District has developed plans to create and implement district-wide policies that identify and assess the learning of all students for early intervention services. Please refer to the BPSB Action Plan (Exhibit A), CCEIS Action Plan (Exhibit B), MTSS, and LCAP (<https://www.scusd.edu/local-control-and-accountability-plan-lcap-resources>).

Recommendation R6

*SCUSD should complete the implementation of MTSS at all elementary schools as the underlying structure for all work designed to improve student outcomes by August 1, 2025. (F5)*

SCUSD's Response to Recommendation R6

This recommendation is being implemented through the development and implementation of the BPSB Action Plan and MTSS frameworks. Professional learning will be introduced and measured for fidelity beginning during the 2024-2025 school year and continuing through the 2028-2029 academic year and includes school sites being in cohorts based on data analysis conducted by the independent monitor. Please refer to the BPSB Action Plan (Exhibit A), CCEIS Action Plan (Exhibit B), MTSS, and LCAP (<https://www.scusd.edu/local-control-and-accountability-plan-lcap-resources>).

Recommendation R7

*SCUSD should mandate educators and administrators to attend professional development on early intervention models that will lead to evidence-based universal screening, benchmark assessments, and progress monitoring for all students by January 3, 2025. (F5)*

SCUSD's Response to Recommendation R7

This recommendation is being implemented. During the 2024-2025 school year, the District will provide training through asynchronous modules on early intervention models that will lead to evidence-based universal screening, benchmark assessments, and progress monitoring. Further, the District will work with its labor partners to mandate such training during the 2025-2026 school year. Please refer to the BPSB Action Plan (Exhibit A), CCEIS Action Plan (Exhibit B), MTSS, and LCAP (<https://www.scusd.edu/local-control-and-accountability-plan-lcap-resources>).

Recommendation R8

*SCUSD should improve accuracy of IEP data by providing professional training on SEIS to special education teachers and providers (e.g., speech therapist, Occupational Therapist, Behavior Therapist, etc.) by January 3, 2025. (F6, F7)*

SCUSD's Response to Recommendation R8

This recommendation is being implemented. During the 2024-2025 school year, the District will provide training through asynchronous modules on SEIS and will work with its labor partners to mandate such training during the 2025-2026 school year. Please refer to the BPSB Action Plan. (Exhibit A.) The District is engaging with its labor partners to collaboratively develop and implement a comprehensive professional learning plan to meet the needs of students and staff.

#### Recommendation R9

*SCUSD should conduct quarterly audits to ensure accountability for the input of SEIS data and the accuracy of information beginning January 3, 2025. (F6, F7)*

#### SCUSD's Response to Recommendation R9

The District is implementing this recommendation through the BPSB Action Plan. (Exhibit A.) School sites and departments will develop portfolios across multiple data points including special education. These data points will be reviewed through a continuous improvement lens on a monthly, quarterly, biannual, and annual schedule, and such review will involve the Independent Monitor and community members.

#### Recommendation R10

*SCUSD should hold principals, teachers, and support specialists accountable to ensure IEPs are updated annually beginning January 3, 2025. (F6, F7)*

#### SCUSD's Response to Recommendation R10

The District understands its obligation to ensure that IEPs are updated annually. In order to build accountability at each school site, the District will implement this recommendation by January 3, 2025, by requiring SCUSD principals to sign off on overdue and on-time IEPs on a monthly basis. In addition and in order to build accountability with teachers and related services providers, the District will implement this recommendation by requiring its Administrators of Teaching and Learning ("ATLs") to sign off on overdue and on-time IEPs on a monthly basis. The District is engaging with its labor partners to collaboratively develop and implement a comprehensive professional learning plan to meet the needs of students and staff.

#### Recommendation R11

*SCUSD should provide necessary support and resource services to keep students in general education classrooms, when possible, rather than placed in self-contained special education classrooms to ensure all students are placed in the least restrictive environment by January 3, 2025. (F8)*

#### SCUSD's Response to Recommendation R11

This recommendation is being implemented and monitored by the Independent Monitor through the BPSB Action Plan. Please refer specifically to Directives 3, 4, and 5 in the BPSB Action Plan. (Exhibit A.)

#### Recommendation R12

*SCUSD should bolster its communications plan and outreach efforts to parents/guardians of special education students to recognize differences in culture, language, and internet access by January 3, 2025. (F9)*

#### SCUSD's Response to Recommendation R12

This recommendation is being implemented. For example, the SCUSD SELPA actively collaborates with its Community Action Committee ("CAC") to build strong community engagement opportunities. Further, the SCUSD SELPA website provides comprehensive and valuable information for parents and the community about special education including but not limited to information regarding parent resources, a parent handbook, the CAC, child find, and alternative dispute resolution processes, Warmline Family Resource Center, Procedural Safeguards, and SCUSD Special Education Department. (<https://selpa.scusd.edu/>.) Also, the District sends an annual notice to all families of enrolled students the provides detailed information about programs, protections, and special education.

Recently, the District revised its letters and brochures regarding child find designed to inform parents and the community about the special education referral and assessment process. The BPSB Action Plan includes Directive 14, which addresses ensuring that SCUSD SELPA has a procedural guide that is usable for parents, guardians, and staff, which is being developed in partnership with review by SCUSD staff and CAC and with approval by the independent monitor. The BPSB Action Plan includes semi-annual parent/family and student surveys to gauge student and parent experiences with data to measure the impact in creating more positive and well-informed experiences among parents/families, the hiring of parent liaisons, a BPSB Action Plan "hotline," and community involvement in committee work. The SCUSD SELPA and Special Education Department issue CAC newsletters, have an equity community of practice, conduct home visits, offer Koffee with Krystal, and are introducing a communication plan with a focus on increasing response rates. Please refer to the BPSB Action Plan. (Exhibit A.)

#### Recommendation R13

*SCUSD should identify a point of contact at each school for parents/guardians of special education students by January 3, 2025. (F9)*

#### SCUSD's Response to Recommendation R13

The recommendation will be implemented. The District will develop a list of the point of contact at each school for parents/guardians of special education students and post it on the SCUSD Special Education Department and SELPA websites by January 3, 2025.

#### **IV. CONCLUSION**

The District appreciates the time and effort spent by the Grand Jury in its investigation and preparing the Report and takes the Grand Jury's findings and recommendations seriously. As discussed in this response, the District is actively engaged in the process of improving its special education services as an equal component of its District's general education program. The District appreciates the opportunity to provide this response and sharing the actions it is taking to improve its special education program.

Sincerely,



Lavinia Phillips  
President of the Board of Education

cc: Ms. Erendira Tapia-Bouthillier, Grand Jury Coordinator, [TapiaE@saccourt.ca.gov](mailto:TapiaE@saccourt.ca.gov)

Enclosures: Exhibit A – BPSB Action Plan  
Exhibit B – CCEIS Plan