

Response of the Siskiyou County Office of Education and Siskiyou County Superintendent of Schools to the Siskiyou County Grand Jury Report, “*The Siskiyou County Office of Education and the Siskiyou County Board of Education Fails Its Most Vulnerable Students*”

Finding 1: *The Siskiyou County Board of Education did not conduct documented performance evaluations prior to approving compensation increases for the County Superintendent of Schools, contrary to its oversight responsibilities under the California Constitution Article IX, Section 3.1(b) and California Education Code section 1209.*

Response to Finding 1: *The County Office of Education and Superintendent wholly disagree with the Grand Jury’s Finding.*

The report cites no authority supporting the proposition that the County Board is required to conduct performance evaluations of the elected Superintendent prior to increasing his compensation. Likewise, the report does not explain how the constitutional and statutory provisions it cites create such a requirement.

It is not the County Board’s role to conduct performance evaluations of the Superintendent. The Superintendent is an elected official not an employee, and the public, through the electoral process, is responsible for deciding whether the Superintendent has met the public’s expectations and performed to their standards. It is neither required nor appropriate for the County Board to evaluate the elected Superintendent, therefore, it is not required to do so prior to increasing his salary.

The County Board *is* required to set the salary of the Superintendent. The Grand Jury Report cites California Constitution Article IX, Section 3.1(b) which requires the County Board to “fix the salary of the county superintendent of schools.” It also cites Education Code section 1209 which provides that the county superintendent shall not increase his own salary without the approval of the county board at a regularly scheduled public meeting. Neither law requires that performance evaluations be conducted prior to an increase of a superintendent’s compensation. Additionally, County Board Bylaw 9500 (County Superintendent’s Remuneration) sets forth the rules and procedures relating to the Superintendent’s compensation and it does not require the Board to evaluate the Superintendent’s performance prior to a salary increase.

Furthermore, the County Board possesses the authority to increase the Superintendent’s salary and its decision to do so here was made in connection with an evaluation of Superintendent’s salary conducted in 2022. At that time, to ensure that it responsibly fulfilled its duties relating to the Superintendent’s salary, the County Board conducted a study of county superintendent salaries in surrounding and similarly sized counties. It then approved what it believed to be an equitable compensation structure for the Superintendent.

The most recent compensation increase referenced in the Grand Jury Report was the continuation of the compensation structure established in 2022. The compensation structure established that the Superintendent is eligible for annual salary increases of 2%, plus any increase above 2% provided to certificated union members. Consistent with this structure, the County Board considers approval to increase every May at a public County Board meeting following an agendaized action item and

public discussion. This procedure complies with the requirements of Article IX, Section 3.1(b) of the California Constitution and Education Code section 1209.

Respondents are unable to determine how the Grand Jury calculated its assertion that the Superintendent's compensation exceeds statewide county superintendent salary average by 46% and 130% for "average districts." The Report does not identify the underlying data, methodology, or comparison groups used to derive those figures. Based on Respondents' review of available compensation data for California county offices of education, the Superintendent's compensation is generally consistent with, or below, the compensation paid to county superintendents.

Recommendation 1: *The Siskiyou County Board of Education should adopt and implement a formal written policy for the evaluation of the County Superintendent's performance, to be completed prior to any consideration of compensation adjustments. The policy should include measurable criteria and a documented review process.*

Response to Recommendation 1: *The recommendation is directed to the County Board not the County Office of Education or Superintendent.*

Respondents defer to the County Board with respect to this recommendation. However, respondents note that the recommendation that the County Board adopt and implement a formal policy for conducting performance evaluations of the Superintendent is not warranted because the Superintendent is an elected official, not an employee of the County Board. The Superintendent is accountable directly to the voters, who assess the Superintendent's performance through the electoral process. The County Board is responsible for fixing the Superintendent's salary and has fulfilled this duty.

Finding 2: *Siskiyou County Office of Education (SCOE) administration staffed Special Day Classes with non-credential or under-credentialed personnel in violation of California Education Code, Title 5, Section 3053 requirements for special education teacher accreditation. After reviewing all the documents and interviews, the Civil Grand Jury uncovered during its investigation that approximately 12 SCOE special education teachers, only three to four, are fully credentialed for their current assignments. This comes to an average of 180 students for each credentialed teacher.*

Response to Finding 2: *The County Office of Education and Superintendent wholly disagree with the Grand Jury's Finding.*

This finding appears to be based, in part, on misunderstandings regarding both the number of students served in SCOE Special Day Classes ("SDC") and the credentialing requirements applicable to SDC teachers.

First, while there are approximately 720 students receiving special education services in all district schools within Siskiyou County, only approximately 80 of those students are enrolled in SDCs with SCOE. SCOE operates 11 to 12 SDCs each year with approximately 3-12 students enrolled in each class.

California Code of Regulations, title 5, section 3053(c), requires that SDC teachers hold an appropriate special education credential and possess the competencies necessary to teach the

assigned students.¹ The regulation does not require that the teacher hold a Clear Education Specialist Credential specifically. In California, the CTC uses a two-level credentialing system for special education teachers consisting of Preliminary Education Specialist Credentials and Clear Education Specialist Credentials.

The first level, a Preliminary Education Specialist Credential, is issued once a teacher has met the basic credential requirements and enables the teacher to teach special education in the areas and settings listed on the credential, including SDC. A teacher holding a Preliminary Credential must complete additional academic requirements to qualify for the next credential level. The second level, a Clear Education Specialist Credential, is issued once all credential requirements have been completed, and the process of obtaining a Clear Credential can take up to five years. Unlike a Preliminary Credential, a Clear Credential can be renewed.

Additionally, an individual who does not have a Preliminary Credential or Clear credential, may lawfully teach a SDC if they obtain one of the following authorizations from the CTC:

- Waiver
- Short-Term Staff Permit
- Provisional Intern Permit (PIP)
- District Intern Credential
- Emergency Permit

During the 2024-2025 school year, SCOE employed eleven (11) teachers to teach SDC. All but one of those teachers is documented to have possessed appropriate CTC authorization at the time they began teaching their assigned SDC. Records indicate that one teacher obtained a Short-Term Staff Permit after the teacher began teaching.

2024-2025 School Year

Teacher 1	Short-Term Staff Permit
Teacher 2	Education Specialist Instruction Credential (Preliminary)
Teacher 3	Education Specialist Instruction Credential (Preliminary); Special Education Limited Assignment Permit: Extensive Support Needs (effective 10/1/24)
Teacher 4	Educational Specialist Instruction Credential (Clear)
Teacher 5	Education Specialist Instruction Credential (Clear)
Teacher 6	Education Specialist Instruction Credential (Clear)
Teacher 7	Education Specialist Instruction Credential (Clear)
Teacher 8	Short-Term Staff Permit (effective 4/7/25)
Teacher 9	Education Specialist Instruction Credential (Clear)
Teacher 10	Education Specialist Instruction Credential (Preliminary)
Teacher 11	Education Specialist Instruction Credential Waiver

During the 2025-2026 school year, SCOE employed eleven (11) teachers to work in SDCs. Ten (10) of those teachers possessed appropriate credentials at the time they began teaching their

¹ Respondents note that the authority referenced in the finding appears to be Title 5, section 3053 of the California Code of Regulations rather than a provision of the California Education Code.

assigned SDC. One teacher was reassigned to teach an SDC after the school year began, and upon reassignment, a Short-Term Staff permit was immediately obtained on their behalf.

2025-2026 School Year

Teacher 1	Educational Specialist Instruction Credential (Clear)
Teacher 2	Educational Specialist Instruction Credential (Clear)
Teacher 3	Educational Specialist Instruction Credential (Clear)
Teacher 4	District Intern Credential
Teacher 5	Educational Specialist Instruction Credential (Clear)
Teacher 6	Provisional Intern Permit
Teacher 7	Short-Term Staff Permit
Teacher 8	Educational Specialist Instruction Credential (Clear)
Teacher 9	District Intern Credential
Teacher 10	Short-Term Staff Permit
Teacher 11	Educational Specialist Instruction Credential (Clear)

Recommendation 2. *Siskiyou County Office of Education should audit the teaching credentials of all current Special Day Class instructional staff using the California Commission on Teacher Credentialing (CTC) requirements for the credentialing of special education teachers and within 90 days of this report's publication, develop and implement a written plan to bring all SDC staffing into compliance with California Education Code credential requirements.*

Response to Recommendation 2: *The County Office of Education has implemented this recommendation.*

SCOE Human Resources ("HR") tracks credential records for SDC teachers to ensure they hold the appropriate credentials, permits, or authorizations required and comply with California Commission on Teacher Credentialing ("CTC") requirements.

Furthermore, in response to the Grand Jury Report, SCOE performed an additional audit of the teaching credentials of all current SDC instructional staff to ensure compliance with the CTC requirements for the credentialing of special education teachers. All teachers assigned to teach SDC during the 2026-2027 school year are in compliance. Because all teachers are in compliance, a written plan to bring staff into compliance is not warranted.

2026-2027 School Year

Teacher 1	Education Specialist Instruction Credential (Intern)
Teacher 2	District Intern Credential
Teacher 3	Education Specialist Instruction Credential (Clear)
Teacher 4	Education Specialist Instruction Credential (Clear)
Teacher 5	Education Specialist Instruction Credential (Preliminary)
Teacher 6	Education Specialist Instruction Credential (Preliminary)
Teacher 7	District Intern Credential
Teacher 8	Education Specialist Instruction Credential (Clear)
Teacher 9	Education Specialist Instruction Credential (Clear)
Teacher 10	Temporary County Teaching Certificate pending transfer of out-of-state credential
Teacher 11	30-day Substitute Teaching Permit (Application for Provisional Intern Permit has been submitted and is expected to be approved.)
Teacher 12	Education Specialist Instruction Credential (Preliminary)

Finding 3: *Siskiyou County Office of Education failed to ensure that Individualized Education Programs (IEPs) were completed and implemented within timelines required by the Individuals with Disabilities Education Act (IDEA) and the California Education Code 56000.*

Response to Finding 3: *The County Office of Education and Superintendent partially agree with the Grand Jury's Finding.*

Respondents agree that timely completion and implementation of IEPs is essential to ensuring that students with disabilities receive the services and supports to which they are entitled. SCOE continuously monitors compliance with special education requirements, including IEP timelines, and works with staff to address any identified delays or procedural issues. In addition, the Special Education Local Plan ("SELPA") Director actively communicates with the California Department of Education regarding compliance.

SCOE makes every effort to complete and implement each student's IEP within the procedurally required timelines. While SCOE strives for full compliance, Respondents acknowledge that isolated instances of missed timelines may occur, as in any educational organization, due to factors such as scheduling challenges, parent requests for postponements, or other case-specific circumstances, SCOE does not believe the Grand Jury Report provides sufficient evidence to support a finding of systemic failure.

The finding does not identify specific cases, timelines, schools, programs, data sources, or compliance metrics that support the conclusion that SCOE failed to ensure IEPs were completed and implemented within required timelines. Without this information, SCOE is unable to fully assess the basis or scope of the finding.

SCOE remains committed to ongoing improvement and welcomes the opportunity to review specific examples or data supporting this finding. Such information would allow a further evaluation of any areas requiring corrective action and help ensure that resources are directed toward documented compliance concerns.

Recommendation 3: *Within 90 days, SCOE should implement an IEP compliance tracking system to ensure that all IEPs are completed and implemented within legally required timelines and that required participants, including school psychologists, are present at all IEP meetings.*

Response to Recommendation 3: *The recommendation has been implemented. The practices described in the recommendation were in place prior to the issuance of the Grand Jury Report.*

SCOE agrees that monitoring compliance with IEP timelines and ensuring participation by legally required IEP Team members is critical to providing appropriate services to students with disabilities. As previously stated, SCOE utilizes the Special Education Information System ("SEIS") to track IEP related timelines and procedural requirements. SEIS provides monitoring tools and notifications related to IEP due dates, annual reviews, triennial evaluations, and other special education compliance requirements. SCOE has utilized SEIS for more than a decade and, prior to using SEIS, used a different information management system for tracking compliance.

Additionally, SCOE employs a SEIS Coordinator who regularly conducts IEP audits to monitor compliance with state and federal special education requirements, identify potential areas of concern, and provide support and corrective guidance to staff as needed. These monitoring activities are intended to promote timely completion and implementation of IEPs and to support continuous improvement of SCOE's special education programs.

The implied recommendation that school psychologists be present at all IEP meetings will also not be implemented because it is not legally required. The recommendation appears to assume that school psychologists are required participants in all IEP meetings. This is not an accurate statement of the legal requirements governing IEP meeting participants. The required participants for an IEP meeting vary depending on the purpose of the meeting and the matters being considered. A school psychologist's participation may be required or appropriate in certain circumstances, including meetings involving the review of psychological assessments or evaluation results, but they are not required members of every IEP Team meeting. Accordingly, SCOE's compliance efforts focus on ensuring the attendance and participation of all legally required IEP Team members based on the purpose and requirements of each meeting, and school psychologists will continue to attend where required or appropriate.

Finally, the SELPA Director receives regular communications from the California Department of Education ("CDE") regarding the monitoring of and compliance with special education requirements within SCOE and throughout the SELPA. The SELPA Director provides districts guidance and support in responding to CDE requests, submitting required documentation, and addressing identified issues to ensure Individualized Education Programs ("IEPs") and related special education practices meet applicable state and federal requirements.

Siskiyou County is also participating in the California Department of Education's Cycle C monitoring process, through which eight (8) Siskiyou County school districts will undergo a comprehensive review of selected special education records, practices, and compliance requirements. Participation in Cycle C is part of the California Department of Education's monitoring activities and was not initiated as a result of the Grand Jury Report.

SCOE will continue to evaluate and enhance its use of SEIS, IEP audit practices, staff training, and administrative oversight to support ongoing compliance with applicable special education laws and regulations.

Finding 4: *School psychologists did not consistently attend IEP meetings as required by IDEA and California Education Code 34 CFR Section 300.321 and IEPs were written in some instances by staff not authorized to do so under law.*

Response to Finding 4: *The County Office of Education and Superintendent wholly disagree with the Grand Jury's Finding.*

As previously stated, school psychologists are not legally required to attend every IEP meeting, nor are they required to prepare every student's IEP. Likewise, federal and state laws do not specify who physically enters information into the IEP plan as long as the IEP is developed and adopted through the IEP Team process with the participation of all required individuals.

Under the Individuals with Disabilities Education Act ("IDEA"), an IEP Team must include 1) the child's parent(s); 2) at least one general education teacher if the child participates or may participate in general education; 3) at least one special education teacher or provider; 4) a representative of the public agency who is qualified and knowledgeable about special education, the general curriculum, and available resources; 5) an individual who can interpret the instructional implications of evaluation results. (See 34 C.F.R. § 300.321.) Additionally, other individuals with knowledge or special expertise regarding the child may attend at the discretion of the parent or school district, and, whenever appropriate, the student may participate as a member of the IEP Team.

IDEA does not require a school psychologist to be a member of every IEP Team or to attend every IEP meeting. Whether a school psychologist's participation is required depends on the purpose of the meeting and whether the school psychologist is needed to fulfill a required IEP Team role, such as interpreting evaluation results. Accordingly, a school psychologist may be required to explain psychoeducational evaluation results, however, in other circumstances a qualified speech-language pathologist, program specialist, special education teacher, or other qualified team member may fulfill the role of interpreting the instructional implications of evaluation results. The appropriate standard is whether all legally required IEP Team members were present or properly excused and whether the team included an individual qualified to interpret evaluation results when required.

SCOE notes that the finding does not identify, and SCOE is not aware of any specific IEP meeting at which a school psychologist was required but failed to attend. Without such information, SCOE is unable to fully evaluate the basis for the finding.

With regard to preparing a student's IEP, there is no legal authority under IDEA, the California Education Code, or federal regulations that require any one member of the IEP Team, to prepare or write IEPs. Instead, IDEA specifically provides that the development of the IEP is the responsibility of the IEP Team as a whole. School psychologists may contribute assessment data, recommendations, and present information regarding the student's present level of performance when appropriate, but there is no legal requirement that they write or prepare every IEP.

In developing student IEPs, SCOE IEP Teams utilize a collaborative effort involving special education teachers, case managers, service providers, administrators, and other qualified staff who contribute information into the IEP document in preparation for team discussion and decision-making.

Recommendations 4: *Siskiyou County Office of Education should implement a written IEP compliance tracking system to ensure that all IEPs are completed and implemented within legally required timelines and that required participants, including school psychologists, are present at all IEP meetings.*

Response to Recommendation 4: *The recommendation has been implemented. The practices described in the recommendation were in place prior to the issuance of the Grand Jury Report.*

SCOE utilizes the Special Education Information System (“SEIS”) to track IEP related timelines and procedural requirements. SCOE’s compliance efforts focus on ensuring the attendance and participation of all legally required IEP Team members based on the purpose and requirements of each meeting. School psychologists are not legally required at every IEP meeting and will continue to attend when required or appropriate.

See also Response to Recommendation 3 above.

Finding 5: *Physical conditions in Special Day Class facilities, including the presence of mold at multiple identified sites, pose health and safety risks to students with disabilities and school staff. Students and staff remained in mold-affected classrooms for extended periods of time before relocation.*

Response to Finding 5: *The County Office of Education and Superintendent wholly disagree with the Grand Jury’s Finding.*

Physical conditions in SDC facilities used by SCOE do not pose health or safety risks to students or staff.

Mold was not identified at any SDC classrooms in use during the 2025-2026 school year. It is unclear whether the Grand Jury is suggesting that the photographs included with its report show mold on ceiling tiles, but the brown spots depicted in those photos are water stains, not mold. Photographs of the back side of those ceiling tiles showing that the spots are indeed water staining and not mold are attached to this Response.

SCOE notes that during the 2025-2026 school year, a staff member reported a musty smell in a SDC classroom at the Gold Street School. SCOE leased that classroom and does not own the school site. In response to the report of the musty smell, SCOE retained a professional inspection firm to conduct a mold assessment of the classroom and prepare a mold inspection report. The mold inspection report concluded that there was no visible mold or other biological growth in the SDC classroom or restroom. Air samples from the bathroom and hallway were also taken at the

time of the inspection and compared to an air sample taken from outside (“control sample”).² The indoor air samples contained fewer mold spores than the outdoor sample. SCOE did not receive any complaints about possible mildew or mold in any other SDC classrooms during the 2025-2026 school year.

Because no mold was detected in any SDC classroom, SCOE denies that students and staff “remained in mold-affected classrooms for extended periods of time” or that SDC classrooms posed “health and safety risks to students with disabilities and school staff.”

Recommendations 5: *Siskiyou County Office of Education should hire mold inspection professionals to conduct a facility inspection of all Special Day Class classrooms within 60 days of this report's publication, remediate all identified mold and safety hazards, and provide written confirmation of completed remediation to the Siskiyou County Board of Education prior to the start of the next 2026/27 school year. Remediation at one site has been deferred; the Grand Jury urges confirmation that remediation is completed before the start of the next school year.*

Response to Recommendation 5: *This recommendation has been implemented and will be completed within 120 days.*

SCOE has retained mold inspection professionals to inspect all SDC classrooms being used during the 2026-2027 school year. The inspections are currently being scheduled. If mold and/or other hazards are identified, SCOE will remediate those hazards reasonably within its control. As noted above, SCOE rents several SDC classrooms and, therefore, may not have the ability or authority to make all suggested corrections.

SCOE notes that it disagrees that “remediation at one site” has been deferred. In December 2025, the professionals inspecting the SDC classroom at the Gold Street School issued a report that found three (3) “deficiencies.” Those deficiencies were:

- Interior – Odor (Cleaning Tools)
- Interior – Damp or Musty Odor
- Exterior – Negative Grading or Drainage

SCOE has corrected two (2) of the three (3) deficiencies. The first deficiency identified, Interior - Odor (Cleaning Tools) – related to a damp, musty odor that was coming from a string mop and mop bucket located inside a closet. SCOE cleaned the closet and discontinued the use of string mops at the site. The second deficiency identified, Interior – Damp or Musty Odor, related to a damp or musty odor coming from inside a cabinet where a portion of the wall had been cut and left open, exposing portions of the wall cavity. SCOE repaired the wall sealing off the wall cavity. The third deficiency identified, Exterior – Negative Grading or Drainage, referred to exterior grading outside the building that appeared to be sloping toward the building. SCOE did not address this deficiency because exterior drainage repairs would need to be completed by the property

² To provide peace of mind to the staff and students assigned to the Gold Street School SDC, and to accommodate class size, SCOE relocated the SDC classroom to the County Preschool building. That relocation was not the result of mold being identified in the SDC classroom at Gold Street School.

owner, and SCOE does not own the property; Yreka Unified School District owns the property. SCOE has notified Yreka Unified School District administration of the drainage concerns.

In addition to addressing the first and second deficiencies, SCOE installed air purifying systems and a HEPA filter exhaust system inside the SDC classroom at Gold Street School. A comprehensive assessment of the HVAC system was also performed.

In June 2026, a follow-up mold inspection was also performed at the SDC classroom at Gold Street School. Once again, no mold was detected and two of the three deficiencies were resolved. The June 2026 report noted only one deficiency, the negative grading noted in the initial December report. An air sample taken of the classroom during the June 2026 inspection was compared to an outdoor (control) air sample and, as with the December testing, the indoor air sample contained fewer spores than the outdoor sample. A copy of the June 2026 report was offered to the Grand Jury, but it declined the offer.

Further, standard maintenance of the SDC classrooms for the 2026-2027 school year is in process and includes painting, waxing floors, and replacing damaged ceiling tiles according to a pre-planned schedule.

Finding 6: *Special Day Class students were not provided with equitable access to school campus library resources, instead, requiring them to access off-campus public library facilities.*

Response to Finding 6: *The County Office of Education and Superintendent wholly disagree with the Grand Jury's Finding.*

SCOE disagrees with the finding that students in SDCs were required to access off-campus public library facilities in place of the school library or that they were systematically denied equitable access to library resources.

SCOE is committed to providing SDC students with equitable access to educational opportunities and school resources, including library services. SCOE is unaware of any policy or practice requiring SDC students to use off-campus public library facilities in lieu of accessing an on campus library.

It is SCOE's understanding that this finding may be based on isolated incidents. SCOE is aware of at least one instance in which a teacher attempted to bring an SDC to the school library outside of their scheduled library times and was asked to return during their assigned library period. No teacher was required or expected to use off-campus facilities; however, it is possible that one or more teachers elected to take students to the public library which is located across the street from the school site.

SCOE is also aware of an instance in which an SDC teacher elected to discontinue library visits. This may have been related to concerns raised by the librarian regarding damage to library books while they were checked out to the class. The teacher was not informed that the class was prohibited from using the library. Rather, the librarian was informed that the class would no longer be participating in library visits.

Students in SDC programs are not denied equitable access to campus library resources or required to utilize off-campus libraries. SDC students are entitled to and are provided access to campus educational resources, including library services, consistent with the same site procedures, schedules, and operational requirements applicable to all students.

Recommendations 6: *Within 90 days, Siskiyou County Office of Education should adopt a written policy ensuring that Special Day Class students have equitable access to campus school library facilities, consistent with the requirements of IDEA and the California Education Code.*

Response to Recommendation 6: *The County Office of Education will not implement this recommendation because it is not warranted.*

Respondents agree that students enrolled in SDC programs should have equitable access to educational opportunities and resources, including school library facilities, consistent with applicable law. SCOE does not have any policy or practice that denies students in SDCs access to campus library facilities or requires them to utilize off-campus public library resources in lieu of onsite facilities.

Respondents believe that the district sites with which SCOE contracts provide SDC students with equitable access to school library facilities consistent with each school's procedures and schedules. Adoption of a separate policy is not necessary because there is no evidence of an issue requiring corrective action. Moreover, educational access for students with disabilities is governed by applicable federal and state laws, including the IDEA, Section 504 of the Rehabilitation Act, and relevant provisions of the California Education Code.

While SCOE does not agree that a new written policy is warranted, it will continue to work collaboratively with its partner school districts and site administrators to ensure that students in SDCs have appropriate access to campus resources and educational opportunities. SCOE will also continue to promptly address any scheduling or operational issues that may arise to ensure students in SDCs receive access to school programs and services.

Finding 7: *Siskiyou County Office of Education's Human Resources department did not consistently investigate or act upon employee complaints of workplace hostility and retaliation, creating conditions possibly creating toxic and hostile working conditions.*

Response to Finding 7: *The County Office of Education and Superintendent wholly disagree with the Grand Jury's Finding.*

The finding provides a general conclusion and does not identify the specific facts, complaints, incidents, or other information on which it is based. As a result, the finding lacks sufficient detail to allow Respondents to fully evaluate and respond to the allegations.

Furthermore, the Superintendent and its Human Resources ("HR") office process complaints in accordance with established practices and procedures, such as Superintendent Policy ("SP")/Administrative Regulation ("AR") 1312.1 (Complaints Concerning County Office Employees) and SP/AR 4030 (Nondiscrimination in Employment). All of SCOE's policies and procedures may be viewed online at

<https://simbli.eboardsolutions.com/Policy/PolicyListing.aspx?S=36031099&ptid=sc8bjy4DPyDA4KHTJ9PnCA==>.

When the HR office receives a complaint, it follows the procedures set forth in these policies. The Superintendent notes that there is a difference between a formal complaint (subject to these policies) and an employee expressing concerns about their coworker or job. Routine discussions about coworkers and work do not always require a formal investigation process. When an employee does not desire their concerns to be addressed by the formal complaint/investigation process, the HR office attempts to resolve the complaint informally.

While SCOE is unaware of any complaints which have not been addressed, SCOE recognizes the importance of documenting steps taken to resolve concerns and intends to document this information in a more comprehensive and thorough manner in the future.

Therefore, while SCOE disagrees with this finding, it recognizes an opportunity to strengthen its processes in this area regarding formally documenting actions taken to resolve complaints. SCOE recently hired a new Director of Human Resources, who is committed to developing formal procedures and documentation protocols for the handling of complaints going forward.

Recommendation 7: *Within 90 days, Siskiyou County Office of Education should review and revise Human Resources harassment complaint handling procedures to ensure that all employee complaints of workplace hostility or retaliation are investigated and documented, consistent with California laws.*

Response to Recommendation 7: *The County Office of Education will not implement this recommendation because it is not warranted.*

SCOE's complaint-handling procedures are governed by County Board Policies and Administrative Regulations addressing employee complaints and allegations of discrimination. These policies and regulations are current and comply with applicable legal requirements. Accordingly, SCOE does not believe that a review or revision of its complaint procedures is warranted absent any identified deficiency.

County Board Policy and Administrative Regulation 1312.1, *Complaints Concerning County Office Employees*, establish the procedures and timelines for investigating complaints against employees. The Board of Trustees most recently revised these provisions on January 21, 2026.

County Policy and Administrative Regulation 4030, *Nondiscrimination in Employment*, establish procedures for the investigation and resolution of discrimination complaints. These provisions were most recently revised on November 1, 2024.

As noted above, the County Office's HR department is committed to creating and maintaining formal documentation of complaints received by the HR Department and the steps taken to address them. This is a commitment to following the complaint processes rather than a commitment to revising the complaint processes, which the HR Department believes better addresses the concerns outlined in this finding.

Finding 8: *Siskiyou County Office of Education did not maintain adequate documentation confirming that classroom supply stipends were distributed to credentialed teachers as required by California Code, Education Code-EDC Section 49011.*

Response to Finding 8: *The County Office of Education and Superintendent wholly disagree with the Grand Jury's Finding*

California Education Code section 49011 does not require schools to provide classroom supply stipends. Rather, section 49011 prohibits public schools from requiring students to pay fees to participate in educational activities. It also requires that all supplies, materials, and equipment necessary for participation in educational activities be provided to students free of charge.

Nothing in section 49011 requires that classroom supply stipends be provided to teachers or that educational entities, such as SCOE, maintain documentation regarding such stipends. Respondents are unaware of any instance in which students have been required to pay money to participate in educational activities in violation of section 49011.

Notwithstanding that it is not a legal obligation, the County Office facilitates classroom supply purchases on an annual basis by permitting teachers to buy the supplies they need (at the County Office's expense). At the start of each school year, the Superintendent provides teachers with instructions on how to purchase classroom supplies. In April 2026, the County emailed all SDC teachers asking for their Amazon Wish Lists and stating that each teacher had a \$600 budget.

As stated above, Respondents are unaware of any instance in which students were required to pay for educational services or activities in violation of Education Code section 49011. Further, the SCOE documents its efforts to provide classroom supplies and support classroom needs. Accordingly, Respondents wholly disagree with this finding.

Recommendation 8: *Within 90 days, Siskiyou County Office of Education should audit classroom supply stipend payment records for the 2024–2025 and 2025–2026 school years and provide documentation to the Siskiyou County Board of Education confirming that stipends were distributed as required or, where not distributed, account for the disposition of those funds.*

Response to Recommendation 8: *The County Office of Education will not implement this recommendation because it is not warranted.*

SCOE will not implement this recommendation because it is based on the mistaken premise that classroom supply stipends are required under Education Code section 49011. Section 49011 imposes no such requirement. The Grand Jury Report also assumes the existence of funds that were required to be distributed as classroom supply stipends and asks SCOE to account for their disposition. As discussed above, Education Code section 49011 does not require classroom supply stipends, and there are therefore no such funds required to be maintained, distributed, or accounted for under that statute.

However, SCOE remains committed to ensuring that classroom needs are appropriately supported. Accordingly, SCOE will review any previously denied requests for classroom materials and

evaluate whether its current procedures could be improved or clarified. SCOE expects to complete this review by December 31, 2026.

Finding 9: *Siskiyou County Office of Education employees were placed in administrative positions without holding required administrative credentials, a practice that had the effect of impacting their prior bargaining unit membership and undermined collective bargaining rights.*

Response to Finding 9: *The County Office of Education and Superintendent partially disagree with the Grand Jury's Finding*

During the 2024-2025 school year, SCOE employed 11 individuals in administrative positions. Ten (10) of the eleven (11) individuals possessed Administrative Services Credentials (Clear). The remaining individual possessed an Administrative Services Credential Certificate of Eligibility³ at the start of the school year and obtained an Administrative Services Credential (Preliminary) on December 1, 2024.

2024-2025 School Year

Administrator 1	Administrative Services Credential (Clear)
Administrator 2	Administrative Services Credential (Clear)
Administrator 3	Administrative Services Credential (Clear)
Administrator 4	Administrative Services Credential (Preliminary)
Administrator 5	Administrative Services Credential (Clear)
Administrator 6	Administrative Services Credential (Clear)
Administrator 7	Administrative Services Credential (Clear)
Administrator 8	Administrative Services Credential (Clear)
Administrator 9	Administrative Services Credential (Clear)
Administrator 10	Administrative Services Credential (Clear)
Administrator 11	Administrative Services Credential (Clear)

During the 2025-2026 school year, SCOE employed seven (7) individuals in administrative positions, each of whom possessed Administrative Services Credentials.

³ According to the CTC, an individual who has completed the requirements for an Administrative Services Credential (Preliminary), but does not have an offer of employment in an administrative position may apply for a Certificate of Eligibility, which verifies completion of all requirements for the preliminary credential and authorizes the holder to seek employment as an administrator. The Certificate of Eligibility has no expiration date. Once securing an offer of employment, the holder of a Certificate of Eligibility may apply for the preliminary credential by submitting their application packet through their employer or directly to the Commission through CTC Online, along with a Verification of Employment Form (CL-777), and current online processing fee. See Administrative Services Credential California Prepared (CL-574c).

2025-2026 School Year

Administrator 1	Administrative Services Credential (Clear)
Administrator 2	Administrative Services Credential (Preliminary)
Administrator 3	Administrative Services Credential (Clear)
Administrator 4	Administrative Services Credential (Clear)
Administrator 5	Administrative Services Credential (Clear)
Administrator 6	Administrative Services Credential (Clear)
Administrator 7	Administrative Services Credential (Clear)

Recommendation 9: Within 90 days, Siskiyou County Office of Education should audit the credentials of all individuals currently serving in administrative roles and ensure that all such positions are filled only by individuals holding the required credentials under California Education Code.

Response to Recommendation 9: *The County Office of Education has implemented this recommendation.*

For the 2026-2027 school year, SCOE employs six (6) individuals in administrative positions, all of whom possess Administrative Services Credentials.

2026-2027 School Year

Administrator 1	Administrative Services Credential (Clear)
Administrator 2	Administrative Services Credential (Clear)
Administrator 3	Administrative Services Credential (Clear)
Administrator 4	Administrative Services Credential (Clear)
Administrator 5	Administrative Services Credential (Clear)
Administrator 6	Administrative Services Credential (Clear)

Finding 10: *Siskiyou County Office of Education voluntarily relinquished its Workability Partnership Program (WA1) slot, a fully federally funded vocational training program serving approximately 400 to 450 students with IEPs, without documented SCBE Board of Trustee authorization or student-impact analysis, thereby eliminating a federally supported transition-to-work program for students with disabilities which is inconsistent with 34 Code of Federal Regulations Section 300.43.*

Response to Finding 10: *The County Office of Education and Superintendent partially disagree with the Grand Jury's Finding.*

Respondents agree that SCOE voluntarily withdrew from the WorkAbility I (WA1) grant program. SCOE did not seek County Board authorization before doing so because Respondents are unaware of any legal requirement that such authorization be obtained.

Respondents, however, disagree that the WA1 program is “fully federally funded.”⁴ The WA1 program is funded and administered by the California Department of Education (CDE) and governed by California Education Code sections 56470-56474.

Respondents also note that during the 2024-2025 school year, approximately 275 SCOE students, not 400 to 450, participated in some aspect of the WA1 program. Many of those 275 students participated only in limited program activities, such as employer field trips, career exploration sessions, or middle school work-based learning experiences. Only 25 students were budgeted for placement in paid employment positions.

Respondents further disagree that 34 C.F.R. section 300.43 required SCOE to operate the WA1 grant program. While the WA1 program may be one method of providing transition-related services to students with disabilities, neither IDEA, 34 C.F.R. section 300.43, or the California Education Code require educational agencies to maintain any *specific* transition service. Rather, they require that transition services be provided. While SCOE discontinued the WA1 grant program, it continues to provide students with all mandatory transition services.

Respondents also disagree with the finding that prior County Board authorization was required before SCOE discontinued participation in the WA1 grant program. Education Code section 56461 provides that the "superintendent shall establish the capacity to provide transition services." County Board Policy 2110 (*County Superintendent Responsibilities and Duties*) further provides that the Superintendent is responsible for managing SCOE's instructional operations. The Grand Jury Report does not identify any statute, regulation, or Board policy requiring County Board approval before SCOE could discontinue participation in the WA1 grant program, and Respondents are unaware of any such requirement.

Finally, Respondents are uncertain what the Grand Jury means by "student-impact analysis." The Report does not define the term or identify any statute, regulation, or Board policy requiring such an analysis before SCOE could discontinue participation in the WA1 grant program. SCOE is not aware of any student with an IEP who has been denied or deprived of legally required transition services as a result of SCOE's withdrawal from the WA1 grant program.

Recommendation 10: *Siskiyou County Office of Education should provide the Siskiyou County Board of Education with a written accounting of the decision to relinquish the Workability Partnership (WA1) program slot, including the process used, any Board of Trustee authorization obtained, and the impact on affected students. The SCBE Board should direct SCOE to take all available steps to restore the program or identify equivalent federally funded transition services, and to report back every 180 days until complete.*

⁴ WorkAbility I: A California Transition Program - Special Education (CA Dept of Education)

Response to Recommendation 10: *The portion of this recommendation directed to the County Office of Education will not be implemented because it is not warranted.*

Respondents share the Civil Grand Jury's disappointment that the WA1 grant program was discontinued. The difficult decision to end the program resulted from SCOE's inability to adequately staff the program.

SCOE remains committed to providing legally required transition services for students with disabilities, however, the WA1 grant program is not a mandatory service.

Additionally, as previously stated, Respondents are unaware of any statute, regulation, or Board policy that required the Superintendent to seek County Board approval before discontinuing SCOE participation in the WA1 grant program. If the Civil Grand Jury identifies legal authority so requiring, SCOE will review that authority and update its response accordingly.

Finding 11: *School District teaching staff are routinely advised that budgets are insufficient for classroom needs.*

Response to Finding 11: *The County Office of Education and Superintendent wholly disagree with the Grand Jury's Finding.*

Respondents disagree with this finding. First, the finding refers to "School District teaching staff." SCOE is not a school district and does not employ school district teaching staff. To the extent the finding concerns teachers employed by local school districts, the fiscal practices at issue would be the responsibility of those districts, not SCOE.

If the finding is intended to refer to SCOE staff, Respondents disagree that teachers are regularly informed that SCOE lacks resources to support classroom needs or that requests for necessary classroom materials or supplies are denied.

SCOE maintains sufficient reserves to support its classrooms and is unaware of any specific instance in which a teacher was informed that SCOE could not afford needed classroom supplies. Consistent with its commitment to supporting student learning, SCOE provides classrooms with the instructional materials, supplies, and equipment necessary to operate its educational programs effectively. Because the finding does not provide additional factual detail or supporting evidence, Respondents are unable to respond in greater detail.

Recommendation 11: *Within 90 days the Siskiyou County Board of Education Board of Trustees should commission an independent review of SCOE's budget reserve levels and allocation practices.*

Response to Recommendation 11: *This recommendation is directed to the County Board not the County Office of Education or the Superintendent.*

Respondents defer to the County Board with respect to this recommendation.

Finding 12: *The Superintendent at SCOE appointed a SELPA Director who was identified by multiple credible sources as lacking adequate depth of special education expertise and who was selected contrary to the 14 recommendation of the hiring committee, raising concerns about governance and compliance capacity for the special education programs within the Siskiyou County public education system.*

Response to Finding 12: *The County Office of Education and Superintendent wholly disagree with the Grand Jury's Finding.*

Respondents disagree with this finding because it is based on unsupported conclusions regarding the qualifications of the SELPA Director and an inaccurate description of the hiring process.

First, authority to appoint the SELPA Director is vested solely in the Superintendent. The SELPA Plan, which governs how the county and schools administer and coordinate special education services, governs the SELPA Director's appointment. The Siskiyou County SELPA Plan states: "The County Superintendent of Schools shall be responsible for the selection, direction, discipline and biennial evaluation of the SELPA Executive Director." Therefore, the representation that there was a "hiring committee" responsible for selecting a director is inaccurate. Instead, the Superintendent convened an "interview panel" to meet with candidates for the SELPA director position. The purpose of the interview panel was not to decide which candidate to hire (which is the typical function of a hiring panel), but to interview candidates and provide recommendations to the Superintendent. SCOE utilized several other interview panels for different administrative positions that the County Office was seeking to fill at that time.

The interview panel interviewed three candidates and offered the position to a candidate they believed qualified. That candidate declined the position.

At the same time, multiple strong candidates applied for another position in the Superintendent's cabinet. That panel informed the Superintendent that one of their candidates would be a great fit for the SELPA Director/Assistant Superintendent of Special Schools and Services position. The Superintendent interviewed this candidate, found her to be a good fit for the position of SELPA Director/Assistant Superintendent of Special Schools and Services, and offered it to her (which she accepted). The Superintendent notes that while prior experience in a program area can be valuable, it is not necessary to be an effective manager and supervisor. The SELPA Director possesses substantial administrative experience, and the ability to effectively manage personnel. The Superintendent has every confidence in her ability to carry out the responsibilities of her position.

Recommendation 12: *Within 90 days the Siskiyou County Board of Education should review the SELPA Director hiring process, including the interview committee's recommendation and the basis for the appointment decision, and should ensure that the SELPA Director position is held by an individual with demonstrated expertise in special education law, program compliance, and IDEA implementation.*

Response to Recommendation 12: *This recommendation is directed to the County Board not the County Office of Education or the Superintendent.*

Respondents defer to the County Board with respect to this recommendation. However, Respondent's note that the Superintendent, not the County Board, is responsible for hiring the SELPA Director. The County Board does not participate in personnel decisions involving SCOE employees. County Boards have limited responsibilities established by law, such as hearing certain appeals, setting the Superintendent's compensation, and reviewing SCOE's budget. Those responsibilities do not include hiring, evaluating, or appointing SCOE administrative staff.

Requiring the County Board to review or approve the Superintendent's hiring decisions would be inconsistent with the legal division of responsibilities established by law and policy. Education Code section 1293 provides that "[a] county superintendent of schools may enter into contracts of employment with persons employed by him," and Education Code section 1311 similarly recognizes that county office employees are employed by the county superintendent. The Superintendent has been delegated legal authority to hire staff who meet the needs of the Siskiyou County Office of Education; the County Board has not.

Finding 13: *Special Day Classes (SDC) classrooms are equipped with locking devices on classroom and bathroom doors that enable the confinement of students with disabilities in bathroom spaces, a practice inconsistent with California Education Code Section 49005 et seq. and IDEA provisions governing restraint as well as fire codes.*

Response to Finding 13: *The County Office of Education and Superintendent wholly disagree with the Grand Jury's Finding.*

Respondents agree that students must not be unlawfully secluded, confined, or restrained, and that all educational environments must comply with applicable state and federal laws regarding student safety. To that extent, SCOE acknowledges that SDC restrooms and classrooms were equipped with locks. However, SCOE disagrees that those mechanisms were installed or used for the purpose of confining students.

Education Code section 49005 and related provisions generally limit the use of restraint and seclusion in schools to emergency situations in which a student poses an immediate risk of serious physical harm to themselves or others. The law prohibits the use of restraint or seclusion for punishment, discipline, convenience, or retaliation. It also provides that placing a student alone in a room or area from which the student is prevented from leaving may constitute seclusion and generally prohibits the use of locked seclusion in schools, except in facilities specifically authorized by state law to utilize locked rooms. A door lock or other mechanism that serves as a general building safety feature is not typically considered restraint or seclusion. The overall purpose of the statute is to protect student safety and dignity while allowing school personnel to take necessary action in emergency situations to prevent imminent physical harm.

The locking devices identified by the Civil Grand Jury were not installed for the purpose of confining, isolating, or secluding students. Rather, they were implemented as safety measures intended to reduce the risk of student elopement in circumstances where students may leave the classroom and enter potentially hazardous areas, including parking lots, roadways, or other unsafe environments. Teachers remained present in the classroom and responsible for supervising students, and the locking mechanisms were not designed or used to isolate students from staff or educational settings.

Many of the students served in SDCs have unique safety needs that require enhanced supervision and safeguards. In certain classrooms, campus configurations and the proximity of classroom exits to roadways, parking areas, or other potential hazards present safety concerns if a student leaves the instructional environment without supervision. SCOE's use of door security measures was intended to address those risks and support a safe learning environment for students and staff.

SCOE, like most public educational agencies, is insured through a Joint Powers Authority ("JPA"). SCOE regularly works with its JPA to identify, assess, and mitigate potential risks. At no time during these reviews were the door latches identified as a safety concern or compliance issue. In May 2026, an independent contractor conducted a hazard assessment at eight (8) district school sites where SCOE operates programs and found no safety concerns related to the locking mechanisms in use at the time.

Nevertheless, SCOE recognizes the importance of continually evaluating its practices to ensure they remain consistent with student safety and evolving legal and operational considerations. Accordingly, following the conclusion of the 2025-26 school year, SCOE began removing the latch-style locking mechanisms and replacing them with door-sensor systems that alert classroom staff when a door is opened. This approach addresses student elopement concerns while eliminating the hardware that was the subject of the finding and recommendation. By implementing this change, SCOE seeks to further reduce any potential concerns regarding the use of physical barriers while continuing to provide necessary protections for vulnerable students.

Recommendations 13: *Siskiyou County Office of Education should immediately conduct a physical inspection of all SDC classroom and bathroom door hardware, remove any locking devices capable of confining students, and within 30 days adopt and distribute a written policy on restraint consistent with California Education Code Section 49005 et seq.*

Response to Recommendation 13: *The recommendation to remove the locking mechanisms has been implemented. However, SCOE will continue to evaluate appropriate safety measures to protect students while maintaining compliance with applicable laws and regulations.*

Respondents agree that all educational environments should be maintained in a manner consistent with student safety and applicable law. Education Code section 49005 et seq. is intended to limit the use of restraint and seclusion to emergency situations involving an immediate risk of serious physical harm and prohibits the use of restraint and seclusion for punishment, discipline, convenience, or retaliation. However, the locking mechanisms identified by the Grand Jury were not installed or utilized for the purpose of confining, isolating, or secluding students. Rather, they were implemented as safety measures to address student elopement risks in classrooms serving students with significant disabilities and unique supervision needs. Teachers remained present in the instructional setting, and the devices were not used to isolate students from staff or educational activities.

Notwithstanding the above, SCOE has already begun removing the identified locking mechanisms and replacing them with door-sensor technology that immediately alerts staff when a classroom door is opened. This alternative approach addresses concerns regarding student elopement while eliminating the hardware that was the subject of the recommendation.

With respect to the recommendation that SCOE adopt a written policy on restraint consistent with Education Code section 49005 et seq., SCOE already operates under state laws, regulations, and procedures governing restraint and seclusion and provides training to staff regarding those requirements. Additionally, many SCOE programs operate on school district campuses, where site procedures and safety protocols adopted by the host district are also in place. SCOE coordinates with host districts to ensure consistency with applicable site practices and legal requirements.

For example, the Yreka Union School District has implemented Board Policy 5131.41 (Use of Seclusion and Restraint), which incorporates Education Code section 49005 and other legal requirements. Accordingly, Respondents do not believe that developing and distributing a separate SCOE restraint policy is necessary to ensure compliance with applicable law.

Photographs Referenced in Response to Finding 5



