



Superior Court of California County of Colusa

BRENDAN MICHAEL FARRELL
PRESIDING JUDGE

532 Oak Street
Colusa, CA 95932

ERIKA F. VALENCIA
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CLERK OF THE COURT
JURY COMMISSIONER

LUKE STEIDLMAYER
ASSISTANT PRESIDING JUDGE

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MEMORANDUM

TO: Governmental Officers and Interested Parties

FROM: Colusa County Grand Jury

SUBJECT: Colusa County Grand Jury 2025-2026 Final Report

DATE: July 2, 2026

Enclosed please find a copy of the approved 2025-2026 Colusa County Grand Jury Final Report.

A copy of California of California Penal Code Section 933 is attached which provides for comments in response to the Report.

State of California

PENAL CODE

Section 933

933. (a) Each grand jury shall submit to the presiding judge of the superior court a final report of its findings and recommendations that pertain to county government matters during the fiscal or calendar year. Final reports on any appropriate subject may be submitted to the presiding judge of the superior court at any time during the term of service of a grand jury. A final report may be submitted for comment to responsible officers, agencies, or departments, including the county board of supervisors, when applicable, upon finding of the presiding judge that the report is in compliance with this title. For 45 days after the end of the term, the foreperson and his or her designees shall, upon reasonable notice, be available to clarify the recommendations of the report.

(b) One copy of each final report, together with the responses thereto, found to be in compliance with this title shall be placed on file with the clerk of the court and remain on file in the office of the clerk. The clerk shall immediately forward a true copy of the report and the responses to the State Archivist who shall retain that report and all responses in perpetuity.

(c) No later than 90 days after the grand jury submits a final report on the operations of any public agency subject to its reviewing authority, the governing body of the public agency shall comment to the presiding judge of the superior court on the findings and recommendations pertaining to matters under the control of the governing body, and every elected county officer or agency head for which the grand jury has responsibility pursuant to Section 914.1 shall comment within 60 days to the presiding judge of the superior court, with an information copy sent to the board of supervisors, on the findings and recommendations pertaining to matters under the control of that county officer or agency head and any agency or agencies which that officer or agency head supervises or controls. In any city and county, the mayor shall also comment on the findings and recommendations. All of these comments and reports shall forthwith be submitted to the presiding judge of the superior court who impaneled the grand jury. A copy of all responses to grand jury reports shall be placed on file with the clerk of the public agency and the office of the county clerk, or the mayor when applicable, and shall remain on file in those offices. One copy shall be placed on file with the applicable grand jury final report by, and in the control of the currently impaneled grand jury, where it shall be maintained for a minimum of five years.

(d) As used in this section "agency" includes a department.

(Amended by Stats. 2002, Ch. 784, Sec. 538. Effective January 1, 2003.)

COLUSA COUNTY GRAND JURY 2025-2026



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FINAL REPORT JUNE 30, 2026



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June 24, 2026

Honorable Brendan Michael Farrell, Presiding Judge
Superior Court of California, County of Colusa
532 Oak Street
Colusa, California 95932

Honorable Judge Farrell,

On the eve of the 250th Birthday Celebration of the founding of our great nation, it is my privilege as the Foreperson of the 2025–2026 Colusa County Civil Grand Jury to provide you with the Grand Jury’s Final Report.

We began by taking the first of several training opportunities available to us through the Civil Grand Jurors’ Association of California. The training manual that we each received, as well as the Colusa County Grand Jury Procedures Manual, were invaluable references to guide us through the work we undertook this term on behalf of our fellow citizens.

My fellow jurors and I feel honored to have served Colusa County in this capacity. The Grand Jury members performed the duties entrusted to us in a professional, ethical and collaborative manner. I am thankful for the hard work and determination they displayed in investigating the topics that came to our attention from concerned members of our community.

I was grateful to meet and work with very knowledgeable and talented jurors. Their special talents helped us navigate the months of interviews, tours, investigations, writing, and meetings. I would like to specifically recognize Cheri Erdelt, Sara Gomez, Floetta Pittman, Brandi Murphy, Woody Gunnoe and Michael Hancock who were instrumental in leading the committees and writing the reports. Also, we are indebted to Senior Deputy County Counsel Jennifer Sutton, our legal advisor, who was always available when needed.

I extend my best wishes and appreciation to the members of the 2026-2027 Grand Jury. I have confidence they will carry on the role of the Grand Jury to provide oversight of our local public agencies to ensure those agencies serve the public in an efficient and professional manner, act as good stewards of the public’s resources, and are transparent in their decision making. This oversight is critically important to maintain the public’s trust in our government agencies.

Finally, I would suggest that you place the responses to the reports immediately after the Final Report to be more easily accessible to the public and to future Grand Juries.

Best regards,



Elaine Rominger
Foreperson, 2025-2026 Colusa County Civil Grand Jury

GRAND JURY MEMBERS

2025-2026

Elaine Rominger, Foreperson
Michael Hancock, Foreperson Pro Tem
Brandi Murphy, Secretary
Cheri Erdelt, County Committee Chairperson
Floetta Pittman, City Committee Chairperson
Sara Gomez, Law Enforcement/Jail Committee Chairperson
Chrisinda McCoy, Audit/Finance Committee Chairperson
Vince Garofalo, Special Districts Committee Chairperson
John Martin
Gloria Estrada
Woodrow Gunnoe
Deanna Cardosa
Martin Gomez Guzman
Loran Hall
Eva Martinez
Eva Myers
Carina Padilla
Jane Hardy
Thomas Quiring

GRAND JURY'S OATH

Each member of the Grand Jury has taken the following oath:

The following oath shall be taken by each member of the grand jury: "I do solemnly swear (affirm) that I will support the Constitution of the United States and of the State of California, and all laws made pursuant to and in conformity therewith, will diligently inquire into, and true presentment make, of all public offences against the people of this state, committed or triable within this county, of which the grand jury shall have or can obtain legal evidence. Further, I will not disclose any evidence brought before the grand jury, nor anything which I or any other grand juror may say, nor the manner in which I or any other grand juror may have voted on any matter before the grand jury. I will keep the charge that will be given to me by the court."

(California Penal Code §911)

CITY OF WILLIAMS

SUMMARY

Under its statutory authority, the Colusa County Civil Grand Jury 2025-2026 has chosen to investigate the City of Williams' (City) operations, processes, and procedures in managing their finances, staff, and conduct leading to their financial crisis. The focus of the investigation was on finances, staffing, operations, and work environment.

The Grand Jury found there are immediate concerns with misuse using the City's credit card, initiating a public works roadway project without using the bidding process, the city's negative financial debt of \$1.17 million, a 50% increase in water/sewer rates over the next 5 years, allegations of hostile work environment, concerns about possible violations of the Brown Act, and the City's financial crisis resulting in furloughs and Cost of Living Adjustment (COLA) not being paid to staff members.

Warning signs were ignored, oversight was neglected, leadership failures were tolerated, and employees suffered while upper management received increased compensation. Until accountability replaces complacency the same problems will continue but under different headlines.

The Grand Jury's efforts included interviews with City administration, staff, City Council members; attending City Council meetings; obtaining personnel and hiring background information; reading newspaper articles, obtaining procurement and contract records, as well as researching City policies.

CITY OF WILLIAMS SUMMARY OF ITEMS

1. Road repair and funding, no bidding for repairs
2. City's financial crisis resulting in furloughs (10% reduction in pay) and 3% COLA not being paid to staff
3. 50% increase in salary to city administrator over three years outside of the normal approval process
4. Allegations of a hostile work environment
5. Concerns of potential violation(s) of the Brown Act
6. Plans to go forward with E Street project without securing sufficient funding
7. Services should be provided with appropriate number of jobs
8. Collapse of effective oversight of public funds by the city council
9. Circumvention of City procurement requirements
10. Severe deterioration of employee morale and retention
11. Financial decisions inconsistent with the city's declining revenues
12. Failure to sufficiently vet and supervise executive leadership

BACKGROUND

The primary function of the Colusa County Civil Grand Jury is the examination and evaluation of certain areas of county government, city government, and special districts. The Grand Jury's investigation is followed by issuing a formal report that details certain aspects. The California Penal Code Article 2, of Section 933 requires that the Grand Jury "shall submit to the presiding judge of the Superior Court a final report of its findings and recommendations that pertain to county government matters during the fiscal or calendar year."

In accordance with the Grand Jury responsibilities, the 2025-2026 Colusa County Civil Grand Jury initiated an investigation into the operations, processes, and procedures of the City of Williams. The purpose of this investigation was to show concerns of appropriate governing by the City Council and the City Manager.

Under California law, the City Council serves as the governing authority and is the direct supervisor of the City Manager. Their responsibilities include:

- Oversight of City operations and executive staff
- Fiscal responsibility and budgetary control
- Transparency requirements under the Brown Act
- Ethical governance under California government code
- Compliance with the California Public Contract Code

Failure to perform these duties allows misconduct to occur uncontrolled and unchecked and erodes public confidence in local government.

METHODOLOGY

During its investigation the Grand Jury reviewed and attended the following:

- The City of Williams official website
- At least six City Council meetings (notes from meetings and meeting agendas)
- Interviews with several City Council members, administration, administrative staff members, and union representatives
- Public records requests
- Procurement and contract records
- Personnel and hiring background information
- Newspaper articles
- Internal communications and directives
- Colusa County Grand Jury Procedures Manual-June 2025
- 2025-2026 Civil Grand Jury Training and Reference Manual

Each interview was conducted in a private setting with up to 7 Grand Jurors present. The main interview questions were asked by one Grand Juror with additional questions or needed clarification of questions asked by other Jurors. Most interviews were digitally recorded as well.

DISCUSSION

The evidence reviewed by the Grand Jury demonstrates not a series of isolated incidents, but a systemic failure of governance, oversight, and accountability within the City.

At the center of this failure is the breakdown of the relationship between the City Council and the City Manager. Under California law, the City Council serves as the direct supervisor of the City Manager and is responsible for ensuring lawful, ethical, and fiscally responsible operations. However, testimony and evidence show that some City Council members appear to lack a basic understanding of this role. At least one City Council member was unaware that the Council holds supervisory authority over the City Manager and is responsible for addressing mismanagement. Additionally, multiple sources expressed concern that some City Council members may not review their information packets prior to meetings, further undermining the public perception of their ability to make informed decisions.

This lack of engagement created an environment where some administrative actions went unchecked. The City Manager gave a directive prohibiting staff from communicating with a city official about city business which directly interfered with oversight and transparency. When oversight is restricted and those responsible for governance are either disengaged or uninformed, accountability collapses.

Financial decisions made during the period of review further illustrate inconsistent and inequitable management practices. While employees were subjected to furloughs resulting in a 10% reduction in wages and hours, they were also required to use personal funds for basic office supplies without reimbursement and essential workplace provisions such hand soap, paper towels, etc. were discontinued. At the same time, executive compensation increased significantly over a 3-year period. These decisions occurred despite documented declines in City revenue, including reductions in sales tax and gas tax revenue.

The treatment of employees and City's workforce reflects broader management issues. Evidence shows low employee morale, increased turnover, and dissatisfaction following denial of cost-of-living adjustments after furloughs were lifted. Reports indicate that staff were pressured to accept furloughs or face layoffs. A vote of "no confidence" in a Director was ultimately disregarded by the City Manager, further contributing to employee distrust in leadership.

Concerns regarding the conduct a Director extend beyond internal workplace issues. The Director's use of a City-issued credit card for personal expenses, repaid only after being identified by Finance staff 37 days later, demonstrates a failure of following acceptable use of the City-issued credit card. Additionally, the awarding of contracts to a company employing the Director's close personal relationship without public disclosure raises potential serious conflict of interest concerns.

The City's procurement practices also raise significant concerns. The declaration of an "emergency" to bypass competitive bidding requirements for a roadway project appears inconsistent with the longstanding deterioration of the road. This action raises questions regarding sufficient compliance with the California Public Contract Code. Furthermore, the acceptance of private financing for a public infrastructure project without clear safeguards introduces the potential for undue influence over public decision-making.

Additional governance concerns arise from reports that three City Council members met privately multiple times outside of noticed public meetings. Such conduct may raise concerns of potential violations of the Brown Act, which is intended to ensure that public business is conducted openly and transparently.

The hiring process of an executive further reflects deficiencies in leadership oversight. Evidence indicates that the City was aware of prior complaints involving a Director. Despite this history the City proceeded with the hire demonstrating a lack of due diligence and risk assessment for a key leadership position. Taken together, these issues reveal a pattern:

- Leadership decisions were made without adequate oversight
- Established policies and legal requirements were disregarded or bypassed
- Employees were subject to adverse financial conditions while executive leadership financially received an increase
- Transparency was limited and accountability mechanisms failed

The City’s challenges are not the result of a single decision or individual action. They stem from a governance structure that is not functioning as intended. When elected officials do not understand or fulfill their responsibilities, and when administrative leadership operates without meaningful oversight, the result is predictable—mismanagement, diminished public trust, and organizational instability.

During its investigation, the Grand Jury learned of a program the prior mayor (continued by the current mayor) started called “Jackets at City Hall”. This voluntary program takes students from the local high school that want to be involved and teaches them what jobs are available through the city, how to reinvest in their community, and that they do not have to move to a bigger city to find a career path. They can stay local and have well-paying careers. The students meet with council members the morning of a city council meeting, then attend the meeting that night with their parents. This appears to be a good program to get the next generation interested in getting involved with local government.

FINDINGS

F1. Employee furloughs and executive compensation.

In July 2025, the City implemented furloughs reducing employee’s hours and wages by 10%. The City imposed financial hardship on employees while increasing executive compensation and demonstrating inequitable and inconsistent fiscal priorities.

F2. Declining revenue ignored.

The Finance Director and a City Council member reported declining revenues including reductions in sales tax and gas tax. The City failed to adjust spending in response to declining revenue, contributing to avoidable fiscal instability.

F3. Questionable dismissal of employee concerns.

Employee unions reported being pressured to accept furloughs or face layoffs. A “vote of no confidence” and complaints were filed against a director. The City’s handling of employee concerns reflect disregard for the workplace conditions.

F4. Employee morale and retention decline.

Evidence shows low employee morale and denial of cost-of-living adjustments after reinstatement from furloughs led employees to seek employment elsewhere. The City's management practices have significantly degraded workforce stability and morale.

F5. Appearance of a conflict

The City awarded a contract to a company employing someone that had a close personal relationship with a Director without sufficient public disclosures, thus eroding public confidence.

F6. Interference with oversight

The City Manager instructed the finance staff not to communicate with a city official. This directive obstructed oversight and undermined transparency.

F7. Procurement violations

The City declared an "emergency" to bypass the bidding requirements for a roadway project despite longstanding poor road conditions and accepted private financing, bypassing public bidding. The "emergency" declaration appears unjustified.

F8. Brown Act concerns

Three City Council members were observed meeting privately outside of official meetings on more than one occasion. These actions raise serious concerns of potential violations of the Brown Act.

F9. Lack of City Council competence and engagement

Evidence shows some City Council members lack understanding of their roles. Multiple members appear to be insufficiently prepared at meetings to discuss agenda items. A lack of preparation among elected officials constitutes a failure of governance.

F10. Failure to adequately vet and evaluate executive leadership

Evidence shows when the City hired a Director they had knowledge of prior employment concerns. The City did not adequately vet a senior executive thus exposing the organization to foreseeable risk.

F11. Failure of oversight

Due to lack of engagement and understanding, the City Council failed to identify and correct misconduct and mismanagement by leadership. The City Council failed in its fundamental duty to supervise executive leadership and protect the public interest.

RECOMMENDATIONS

R1. Mandatory Governance Training

All City Council members shall annually complete training on their roles, oversight duties, and compliance with the Brown Act.

R2. Use of Public Funds

The City shall review annually the current credit card policy and the actual use of the City's credit cards, followed by employee training.

R3. Conflict of Interest Enforcement

All elected officials and managers need more robust ethics training on an annual basis to ensure compliance of state law and city policy regarding conflict of interest and public disclosures.

R4. Executive Hiring Standards Reform

The City shall consistently implement formal background investigation requirements and take findings seriously.

R5. Comprehensive review of staffing needs and employee morale

Review job descriptions and employee responsibilities and make the adjustments to staffing as deemed necessary to assist in improving the City’s financial crisis and employee morale.

R6. Report out with an agenda item completion of R1 through R5 as each occurs.

REQUIRED RESPONSES

The following responses are required, pursuant to Penal Code §§ 933 and 933.05:

From the following elected city officials within 60 days:

The Williams City Council
Findings F1 through F11
Recommendations R1 through R6

INVITED RESPONSES

Responses are invited from the following within 90 days:

The Williams City Manager
Findings F1 through F11
Recommendations R1 through R6

The Williams City Attorney
Findings F1 through F11
Recommendations R1 through R6

DISCLAIMER

This report issued by the Colusa County Civil Grand Jury does not identify individuals interviewed. Penal Code § 929 requires that this report by the Grand Jury must not contain the name of any person or facts leading to the identity of any person providing information to the Grand Jury.

This report on the City of Williams is issued by the full 2025-2026 Grand Jury. No Grand Jurors were recused from the investigation.

INSPECTION OF THE COLUSA COUNTY JAIL

SUMMARY

California State Law, California Penal Code § 919(a) and (b), mandates that the Colusa County Grand Jury (Grand Jury) will inspect all prison and jail facilities on a yearly basis. The Grand Jury met with the Colusa County Jail's (Jail) operations team on February 18, 2026. Jails in California operate under Board of State and Community Corrections (BSCC) standards, which sets the guidelines for recreation, food, and healthcare for inmates. Although the current Jail does not meet all BSCC standards, the Jail is grandfathered in because of the fact that it was built in the 1960's.

The current Jail facilities have security risks to both staff and inmate population due to the linear design. These issues will be addressed with the opening of the new jail facility which has a podular design. The new Jail should be open by the time this report is released.

BACKGROUND

The Grand Jury (Jury) conducted its initial inspection of both the old Jail and the new Jail currently under construction on Friday February 27, 2026 to evaluate the safety, security, and treatment of inmates. The current Jail was originally opened in 1962 as a 96-bed facility that later dropped down to its current 92 bed capacity. The new Jail will be a 96-bed facility with a medical wing and complete fully-equipped dental chair and X-ray machine if a dentist needs to come into the facility.

METHODOLOGY

Information for this investigation was sourced from the following:

- Grand Jury Committee tour of the Jail facility
- Interviews with the Jail's administration and staff
- Interviews with a male and female inmate
- Past Grand Jury reports
- Title XV operating standards
- Documents concerning Jail services available to inmates provided by the Jail, which included:
 - Colusa County Behavioral Health
 - Commissary Offerings
 - A weekly menu from Trinity Services Group
 - Program Offerings i.e. GED and High School Diploma
 - Substance Use Recovery Treatment (SURT)
- Review of Jail inspections conducted by the BSCC
- California Grand Jurors Association (<https://cgja.org>)

DISCUSSION

PRE-INSPECTION INTERVIEW

On February 18, 2026 members of the Grand Jury and Jail operations met with a prepared list of questions to acquaint the Grand Jury with the overall responsibilities and operation of the Jail.

JAIL TOUR

On February 27, 2026 members of the Grand Jury toured both the current Jail and the new Jail under construction. The inspection included touring the intake processing area, housing units, kitchen and food storage area, recreational area, educational programming rooms, medical office, laundry, Jail staff break room, and commissary storeroom.

The current Jail facility is linear, whereas the new Jail has a podular design so if you are in the second-tier control area you can look down on every pod and every dorm. The new jail has Jail personnel and inmates' safety as a priority. For instance, in the current facility they have to transport incarcerated persons from their dorm to the recreation yard. In the new facility they have access to a recreation yard in every single dorm and every single pod.

When the new Jail is completed, the current jail is not going to be decommissioned. They will continue to use the current jail for laundry and food services. Additionally, the current Jail will be used for intake of incarcerated persons or arrestees. It will still be used for booking.

MEDICAL SERVICES

The Jail has contracted with WellPath for onsite medical health care services. There is currently one full-time Registered Nurse who provides medical services for the inmates and a part-time Licensed Vocational Nurse. Nursing staff have an on-call doctor available for consultation and medical directives as there is no doctor on site. If additional treatment is needed beyond what the Jail can provide, inmates are transported to the hospital. Psychological services are provided by the Colusa County Behavioral Health Services on an as-needed basis. The current medical facilities are very limited and provide significant challenge for the medical staff. The new Jail will have a medical wing including a fully equipped dental area. The Jury learned that once the current contract with WellPath expires at the end of June this year, the contract will not be renewed. Once the contract expires, it is the intent that the County will take over medical care for the Jail.

FINDINGS

- F1. The Grand Jury finds that the Jail administration and staff are operating the facility in an efficient and professional manner.
- F2. The Grand Jury finds that the Jail is in compliance with its annual scheduled and "surprise" inspection and maintains a Safety plan for staff and inmates.
- F3. The current Jail's linear design has security risks that does not allow for continuous observation of inmates. This will be eliminated with the opening of the new facility.
- F4. The current medical contract with WellPath is not being renewed at the end of June and the County is providing medical services themselves.

RECOMMENDATIONS

R1. The Grand Jury recommends the Jail staff closely monitor medical services provided to the incarcerated once the County takes over medical care to assure they are at acceptable standards.

REQUEST FOR RESPONSES

The following responses are required pursuant to Penal Code §§ 933 and 933.05:

From the following individuals and governing bodies:

Colusa County Sheriff:

- Findings F1, F2, F3, F4
- Recommendation R1

Colusa County Board of Supervisors:

- Findings F1, F2, F3, F4
- Recommendation R1

INVITED RESPONSES

The following responses are invited from the following individual:

Lieutenant – Correctional Services, Colusa County Sheriff’s Department:

- Findings F1, F2, F3, F4
- Recommendation R1

DISCLAIMER

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This report on the Colusa County Jail is issued by the full 2025-2026 Grand Jury. No Grand Jurors were recused from the investigation.

Colusa County Civil Grand Jury Special Education Investigation Report

SUMMARY

The Grand Jury investigated the implementation of the special education Individualized Education Program (IEP) processes, the delivery of services, and administrative oversight in Colusa County. Interviews with paraeducators and parents, coupled with documentary materials, revealed recurring service disruptions tied to staffing shortages, limited staff training, and inconsistent IEP implementation. The Grand Jury also reviewed allegations of post-meeting IEP alterations and unauthorized signatures. This investigation found systemic deficiencies that hinder compliance, compromise student safety and progress, and erode public trust.

The Grand Jury recommends implementation of record-locking and audit controls; mandatory service tracking and parent notifications; annual legal-compliance training; whistleblower protections; designation of a compliance officer; corrective action plans and compensatory education where appropriate.

BACKGROUND

The investigation was prompted by complaints regarding IEP integrity, missed services, capacity shortfalls in placements and ADA accommodations, and administrative practices potentially discouraging reporting of violations. The scope covered service delivery across the county, including out-of-county placements where local capacity was limited.

The Grand Jury conducted confidential interviews with current and former paraeducators, parents of students with disabilities, and the County Superintendent of Schools. The investigation focused on compliance with federal and state law (IDEA, Section 504, FAPE), district policies, and the lived experiences of stakeholders.

The Grand Jury received timely, complete responses, along with all requested records and full cooperation from county administrators.

METHODOLOGY

- Review of published report from the 2022-2023 Grand Jury, *Special Education Investigation Report*, along with the response from the Colusa County Superintendent of Schools in 2023, dated September 25, 2023.
- Confidential interviews with multiple individuals representing paraeducators, parents, and administration.
- Review of IEP implementation practices, staff training records, and administrative oversight procedures.
- Analysis of service logs, incident reports, and communication protocols.
- Application of the Report Logic Matrix to ensure findings are supported by verified facts and sources.
- Review of Colusa County Office of Education (CCOE) Special Education Local Plan Area (SELPA) Website.

DISCUSSION AND ANALYSIS

IEP Implementation and Service Delivery

An IEP is a legally binding document that outlines a customized special education plan and related services for a public school student with a disability, which is federally protected under the Individuals with Disabilities Education Act (IDEA). There are two qualifying requirements for a student to receive an IEP: 1) have a qualifying disability that is a diagnosed or identifiable condition recognized by IDEA, and 2) the disability must adversely affect the student’s educational performance to the extent that specially designed instruction is needed to access the education curriculum.

Multiple interviews described routine service disruptions caused by staff absences, limited qualified substitutes, and frequent reassignment of “floaters,” resulting in missed or reduced minutes of one-on-one educational training, and reduced inclusion time. Parents reported delays in convening IEPs or addenda and lack of notification when services were missed.

Staffing, Training, and Documentation

Paraeducators recounted minimal role-specific training, inconsistent access to IEP content, and confusing Crisis Prevention Institute (CPI) expectations—conditions that contribute to classroom removals and inconsistent implementation. CPI expectations for paraeducators center around maintaining safe, supportive, and structured learning environments. These expectations are typically outlined by district policies.

Student Safety

Student elopement occurs when a student leaves a designated, safe area or supervised setting without permission from staff. During the course of the investigation, the Grand Jury discovered each District was responsible for security measures of the schools under their responsibility. The Grand Jury noted elopement incidents and site-level differences in controls (e.g., gate-lock procedures), underscoring the need for standardized policy and rapid parent notification.

Document Integrity and Compliance

During the course of the investigation, the Grand Jury learned of instances where the experiences of the interviewees were not matching with the IEPs. The Grand Jury received reports from parents and staff indicating that some student’s Individualized Education Programs do not accurately reflect the services currently being delivered. These concerns raise questions regarding the implementation and monitoring of mandated special education services. Discrepancies between documented and delivered services may result in unmet student needs, reduced accountability, and potential noncompliance with state and federal special education requirements.

Placement, ADA, and Assistive Technology

Delays in appropriate placement of children into special education programs, minimally adequate ADA accommodations, and untimely provision/training for adaptive communication devices impede student progress; families require home devices and training to reinforce school-based services.

Parents described out-of-county placements because the local services were not available, which was reinforced by comments during administrative interviews. The numbers of instances remained small, but persistent nonetheless. Acknowledging transportation is provided to the available out-of-county services, parents express the desire to have these services within the community they live, allowing students to remain connected to their families, communities, and school peers.

The Grand Jury found that students with special needs who experience toileting challenges may be required to remove soiled clothing in restroom facilities that provide limited privacy. Because standard restroom stalls often leave gaps that allow visibility beneath partitions, students may be exposed to classmates while attending to personal hygiene needs. Consideration should be given to providing full length partitions or changing facilities to protect student dignity, reduce the risk of embarrassment and bullying, and support a safe and inclusive educational environment.

FINDINGS

- F1. Services are frequently disrupted and IEP minutes and placements are not always delivered consistently.
- F2. Staff lack consistent access to IEP details and adequate training, leading to inconsistent implementation.
- F3. CCOE does not consistently implement IEPs as written; the least restrictive environment is compromised.
- F4. Parents are not always properly notified when services are missed or changed; progress monitoring is opaque.
- F5. Student safety controls (e.g., elopement prevention) vary by site and are insufficiently standardized.
- F6. Staff training gaps (CPI, autism/Applied Behavioral Analysis (ABA), documentation) contribute to behavior-management challenges and lost instructional time.
- F7. Delayed placements, late assistive-device provision impede timely student gains; home support and training are required. Although well within ADA compliance, the investigation discovered some deficiencies in ensuring dignity of students.
- F8. Local capacity gaps in programming necessitate out-of-county placements for some students, detaching them from community support.

RECOMMENDATIONS

- R1. Implement written policy to finalize, lock, and preserve IEPs immediately post-meeting; document any subsequent changes only via formal amendments or new meetings with parents.
- R2. Establish a mandatory tracking system for service delivery, missed minutes of service (with reasons), and timely parent notifications. Develop corrective action plans and provide compensatory education for students identified as not receiving required IEP services. Parents are not being notified of minutes missed and no current system to make up for them. Parents should be encouraged to review this information against their originally signed IEP to verify that approved services are being implemented as written and that appropriate plans are in place to address any missed services. This process would increase transparency, accountability, and compliance with IEP requirements while enabling parents to participate meaningfully in monitoring their child's education.
- R3. Provide annual training for all special education staff, administrators, and support personnel on legal IEP requirements, record-alteration prohibitions, confidentiality laws, and consequences of noncompliance.
- R4. Designate an independent compliance officer/independent monitor and/or CCOE advisory/review committee responsible for IEP integrity oversight, monitoring adherence to special education laws, and direct reporting to the governing board.
- R5. Report back to the newly formed oversight body (R4) within 60 days (status) and 120 days (documentation of full/substantial compliance).
- R6. Establish a credentialed substitute bank and permanent floaters to cover daily absences; maintain coverage protocols so one-on-one supports are not deviated from.
- R7. Standardize site safety and elopement policies (gate-lock logs, radio protocols, incident escalation), require post-incident IEP reviews, and ensure immediate parental notification.
- R8. Expand local capacity and timely outside placements where necessary; provide home devices and parent training for adaptive communication needs.

REQUIRED RESPONSES

Pursuant to Penal Code section 933 and 933.05, the following bodies are required to respond to Findings and Recommendations contained in this report:

From the following elected county officials within 60 days:

- Colusa County Office of Education- Superintendent of Schools (for F8, R1-8 as operational oversight)

INVITED RESPONSES

Responses are invited from the following within 90 days:

- Colusa County Office of Education SELPA Colusa County Director (R2, R5, R7)
- Colusa Unified School District, Maxwell Unified School District, Pierce Joint Unified School District, Williams Unified School District, Princeton Joint Unified School District- The Superintendent of each (F1, F5, F8, R2, R5, R7)
- Governing Board of the Districts: Colusa Unified School District, Maxwell Unified School District, Pierce Joint Unified School District, Williams Unified School District, Princeton Joint Unified School District (F1, R1, R2, R4, R6, R8).

Reports issued by the Grand Jury do not identify individuals interviewed. Penal Code section 929 requires that reports of the Grand Jury not contain the name of any person or facts leading to the identity of any person who provides information to the Grand Jury.

DISCLAIMER

THIS REPORT ON THE SPECIAL EDUCATION INVESTIGATION IS ISSUED BY THE FULL 2025-2026 GRAND JURY WITH 3 RECUSALS FOR THIS INVESTIGATION.

GLOSSARY

SPECIAL EDUCATION GLOSSARY

LEGAL AUTHORITY AND GOVERNING FRAMEWORK

- IDEA: Federal law mandating special education services, procedural safeguards and due process rights for students with disabilities.
- FAPE: Requirement that each student with a disability receives special education and related services designed to confer meaningful educational benefit at no cost to the parent.
- Section 504: Federal civil rights statute prohibiting discrimination based on disability, may apply when a student does not qualify under IDEA.
- FERPA: Federal law governing confidentiality and access to student educational records.

INDIVIDUALIZED EDUCATION PROGRAM

- IEP: Written, legally enforceable document developed by the IEP team specifying goals, services, accommodations, and placement.
- Present Levels: California usage referring to baseline academic and functional performance (commonly called PLAAFP in federal guidance).
- Annual Goals: Measurable objectives designed to address identified areas of need.
- Offer of FAPE: Specific statement in the IEP documenting services, placement, and supports offered to the student.
- PWN: Written notice provided when a district proposes or refuses to initiate or change identification, evaluation, or placement.

SERVICES AND SUPPORTS

- ABA: A therapy and educational approach used to help individuals with developmental disabilities particularly those on the Autism Spectrum Disorder.
- SAI: Primary instructional service in California, replacing the federal term "SDI" in most IEP documents.
- Related Services: California uses "Related Services" interchangeably with DIS; includes speech, counseling, OT, and transportation.
- Speech Services: Services provided by a credentialed speech-language pathologist.
- OT: Services addressing fine motor, sensory processing, and functional skills.
- APE: Modified physical education services based on assessed need.
- Transportation: Service required when necessary for the student to access education.

PLACEMENT AND SERVICE DELIVERY

- LRE: Requirement that students are educated with nondisabled peers to the maximum extent appropriate.
- General Education Setting: Instruction primarily within general education classrooms with supports.
- Special Day Class: California-specific term for a more restrictive classroom setting for students requiring intensive support.
- NPS: Certified private school placement when public programs cannot meet student's needs.

ELIGIBILITY CATEGORIES

- SLD: Disorder impacting basic psychological processes involved in learning.
- OHI: Includes conditions such as ADHD that limit strength, vitality, or alertness.
- AUT: Developmental disability affecting communication and social interaction.
- ED: Persistent emotional or behavioral condition adversely affecting educational performance.
- ID: Significant limitations in intellectual functioning and adaptive behavior. Assessment and Pre-Referral Systems.
- SST: School-based intervention team addressing concerns prior to referral for special education.
- MTSS: California-adopted framework integrating academic and behavioral interventions.
- Assessment Plan: Written plan provided to parents outlining proposed evaluations requiring consent.

OVERSIGHT AND ADMINISTRATIVE STRUCTURE

- CDE: State agency responsible for monitoring compliance, investigating complaints, and enforcing special education law.
- SELPA: Regional governance structure coordinating services, funding, and compliance among districts.
- OAH: Agency responsible for conducting due process hearings and issuing binding decisions.

DISPUTE RESOLUTION AND COMPLIANCE

- Compliance Complaint: Formal complaint filed with COE alleging violations of special education law.
- Due Process: Formal legal procedure to resolve disputes between parents and school districts.
- ADR: Mediation or facilitated IEP processes used to resolve disputes informally.
- CAPA: Required actions imposed following findings of noncompliance. Discipline and Behavioral Protections
- MOR: Required review to determine whether misconduct is related to a student's disability.
- Behavior Emergency: Serious behavioral incident requiring documentation and potential intervention planning,
- Interim Alternative Educational Setting: Temporary placement used under specific disciplinary circumstances.

TRANSITION SERVICES

- Transition Services: Coordinated activities preparing students for employment, education, and independent living.
- ITP: Required IEP component beginning no later than age 16.
- DOR: State agency providing vocational and transition support.