

# **INNOVATIONS IN EDUCATION**

## **SUMMARY**

The Grand Jury chose to investigate two diametrically opposed educational programs new to San Diego County. One program is for highly motivated or socially mature students and the other is for incarcerated students with low reading skills. We undertook this study to evaluate both programs, to see how beneficial they might be, and to determine if they should be expanded or disbanded.

We found the Middle College High School (MCHS) program at Grossmont College to be exceptionally well developed, highly motivational for the students, and a positive addition to the Grossmont Union High School District. In this program, students complete their last two years of high school while simultaneously taking a minimum (6) units of college credits per semester.

We found the reading program developed by Lindamood-Bell™ Learning Process (LMB) to be a productive effort to increase literacy and ultimately decrease recidivism at Camp Barrett and Rancho Del Campo Juvenile Ranch Facilities (JRF). A joint effort of the San Diego County Probation Department and the San Diego County Board Of Education is now operating in the two East County detention facilities having incarcerated juveniles with an average reading level at the fourth grade.

Both programs, although completely different, and addressing completely different educational problems, are endeavoring to raise the level of education for these small groups of San Diego County students. Combined, however, the two programs represent a substantial number of San Diego citizens of the future.

The Grand Jury recommends that the MCHS program be expanded and replicated to provide equivalent services to other community colleges and high schools throughout San Diego County. It also recommends that several actions be taken in regard to the LMB program: that further research be conducted, that serious consideration be given to issues of cost effectiveness, and that the feasibility of preparing San Diego County certificated teachers to function in the program be examined.

## **PURPOSE OF THE STUDY**

The purpose of the study is to evaluate the following two innovative educational programs in San Diego County. We recognize that institutional changes in education seem to happen rarely. The reason for this rarity may be that both innovations and institutional changes question and challenge the established turf and influence of various special interests.

### **A. Grossmont Middle College High School**

This program provides an alternative for motivated—yet at-risk—students. The Grand Jury’s purpose is to consider the financial, management and educational value of the program for possible elimination, modification, continuation, or expansion to other high schools and community colleges.

### **B. A Literacy Program for Incarcerated Juveniles**

This literacy program is currently being tested at two San Diego County Probation juvenile detention facilities: Camp Barrett and Rancho Del Campo. The Grand Jury’s purpose is to consider the financial, management and educational value of the program for possible elimination, modification, continuation, or expansion to other similar venues.

## **A. GROSSMONT MIDDLE COLLEGE HIGH SCHOOL (MCHS)**

The remarkable thing about MCHS is that, although it rearranges—at least marginally—existing educational institutions, it manages to do so with their blessings and support and without any apparent acrimonious behavior. To a large extent, this is a manifestation of fine leadership on the part of a number of the individuals involved.

### **BACKGROUND INFORMATION**

MCHS is an alternative high school born out of cooperation among the San Diego County Board of Education, Grossmont Community College, and the Grossmont Union High School District. Its purpose is to inspire, challenge and serve students with strong intellectual capacity and greater social maturity than the average high school student. Yet, such students, despite their intellectual potential and social maturity, may not do well in a traditional high school: they often see the level of instruction as not challenging enough or they may have socially outgrown their peers. As a result, they belong to a high-risk group of students in the sense that there is a very high likelihood that many will drop out of high school. The MCHS concept addresses these problems.

The Charter of MCHS was developed in Spring 2000 with a \$4,000 Carl Perkins Research Grant and implemented in Spring 2001 when the first instructor was hired. Financial viability is further enhanced by cooperative actions of the agencies involved; e. g., the college provides classroom space at no charge to the high school district, students are reimbursed by the college for such expenses as lab fees, and the MCHS’s Average Daily Attendance (ADA, the major criteria for funding from all sources<sup>1</sup>) is counted toward both the high school and the college budgets.

According to its Charter, students enter the program as high school juniors and continue through the senior year and graduation. Those enrolled in MCHS take both high school and college courses simultaneously, all meeting at the Grossmont Community College campus. Each student

---

<sup>1</sup> Financial sources include federal, state, and county governments.

must carry at least 6 units of college work per semester in conjunction with the high school courses as required by **California Education Code §46141**.<sup>2</sup> Each student must also maintain at least a 2.0 and a 2.4 Grade Point Average (GPA) at the college and the high school levels, respectively.

In June 2001, announcements and applications for the new program were mailed to the home addresses of all sophomore students in the Grossmont Union High School District. Applications began arriving very quickly. Each applicant was first screened for eligibility and then, based on a required essay and interviews by a counselor, the MCHS teacher, a representative of the college's Director of Curricula office, and a school psychologist, 33 students were selected for the first group. They began attending classes as juniors in August 2001.

## **PROCEDURES EMPLOYED**

The Grand Jurors did the following:

- Examined documents related to the early design and implementation of the program.
- Reviewed the program design of similar 'middle colleges' in California and other states.
- Attended an orientation meeting for students, parents and interested parties prior to the 2002 Fall Semester.
- Interviewed the first teacher with the MCHS.
- Interviewed several students enrolled in the program.

## **FACTS AND FINDINGS**

The program had an enrollment of 62 students when the Grand Jury's investigation began in Autumn 2002; 30 were newly accepted as juniors and 32 were continuing seniors from the first group.

Eleven of the original 33 students dropped out of the program for various reasons during the first semester of classes; reasons included moving out of the District, returning to the local high school, dropping out of school, etc. High school counselors filled those vacancies, as they occurred, with students from a waiting list. The substantial (1/3) attrition rate is the only negative factor discovered in the investigation. However, even the negative that characterized the first junior class has produced positive results. The selection process has already evolved—

---

<sup>2</sup> §46141 Minimum schoolday: The minimum schoolday in any high school . . . is 240 minutes.

at the request of the enrolled students themselves. Current students now assist in the interviewing of new applicants. The students who participate in the screening appear to be very insightful and creative in the interview process. It may be assumed that the selection process will continue to evolve and improve as experience accumulates over time.

At present, the educational experiment introduced by MCHS seems to yield, in principle, many positive results. The following information reflects the combined efforts of the 22 students remaining out of the 33 originally accepted into the program.

The current data<sup>3</sup> show substantial improvements in academic performance. The average pre-MCHS GPA of the students was 2.7 while the average post-MCHS GPA of those same students for the Fall 2001 and Spring 2002 semesters were 3.1 and 3.0, respectively. Moreover, the same 22 students earned an average junior college GPA for Fall 2001 and Spring 2002 semester of 2.0 and 2.4, respectively.

The behavior problems that often beset at-risk high school students, as discussed earlier, decreased substantially. More specifically, Table 1 provides a bird's-eye view of the severity of the behavior problems for the pre- and post-MCHS periods for those 22 students.

**Table 1. Pre- and Post-MCHS Behavioral Problems**

<b>Pre-MCHS</b>	<b>Referrals 129</b>	<b>Absences 597</b>	<b>Tardies 312</b>	<b>Truancies 669</b>
<b>Post-MCHS</b>	<b>Referrals 0</b>	<b>Absences 90</b>	<b>Tardies 94</b>	<b>Truancies 10</b>

Table 1 shows that the referrals (to a school counselor, psychologist, principal, etc.) have decreased by 100%, absences by 85%, tardies by 70%, and truancies by 99%. It is worth noting that the substantial reduction in absences not only adds to the amount of knowledge made available to an individual student in the classroom, but also contributes to the financial health of the school itself via the ADA. The average ADA income to the education system is \$8,000 per year, per student.<sup>4</sup>

All these seem to be remarkable achievements and we sincerely hope they are not optical illusions due to statistically non-significant results. On this basis, therefore, we are well advised to show restraint in celebrating these outcomes for, indeed, we need a larger sample to make sure that these results are not statistical artifacts.

Meanwhile, a second certificated teacher was assigned for the Fall 2002 semester at MCHS in order to meet the needs of the increasing student body. The two teachers are now co-leaders of the program. Further, the MCHS's administration is about to apply for accreditation as an alternative high school.

**Recommendations for the MCHS Program:**

<sup>3</sup> All data provided by MCHS teacher.

<sup>4</sup> San Diego County Board of Education.

1. Expand the program to Cuyamaca Community College and to other San Diego County high schools and community colleges.
2. Provide additional funding from the high school and college districts to ensure that longitudinal research studies are conducted as to the effectiveness of the program.

### **Commendations for the MCHS Program:**

1. Dr. Stephen Coover, Director of Curricula, is commended for his foresight in promoting the innovative plan and his wisdom in identifying a talented person to implement it.
2. Ms. Cathy Zemlick is praised for her dedication and persistence in developing the first such alternative high school—one that combines high school and college studies—in San Diego County. In less than two months Ms. Zemlick, working alone as ‘the start-up teacher’, coordinated (and often developed) all of the initial educational and administrative processes that were needed.

## **B. A LITERACY PROGRAM FOR INCARCERATED JUVENILES**

According to a nationwide study, juvenile offenders who average 15.6 years in age (10<sup>th</sup> grade level) had an average reading level at or below the 4<sup>th</sup> grade. The U.S. Department of Education’s statistics show that 85% of all juvenile offenders have reading problems.<sup>5</sup>

### **BACKGROUND INFORMATION**

In August 2002, Judge James R. Milliken of the San Diego Superior Court, Juvenile Division initiated a serious effort to reverse these trends in San Diego County. His efforts led to a contractual agreement (described below) on the basis of **Government Code §23015**.<sup>6</sup>

The San Diego County Board of Education contracted with Lindamood-Bell™ Learning Processes (LMB) to provide a fast-paced reading program at two juvenile detention facilities located in southeast San Diego County: Rancho Del Campo and Camp Barrett (also known as the Youth Correctional Center or YCC). Under the terms of the contract, LMB is working with

---

<sup>5</sup> Press release by Lindamood Bell-Learning Processes, August 28, 2002

<sup>6</sup> GC §23015 A county may conduct or participate in programs for the training, education or rehabilitation of wards or offenders, including, but not limited to, programs in which state or federal funds are granted or reimbursable. In connection therewith, a county may contract with federal, state or local public agencies, private persons, corporations, and other business entities, and may make such expenditures of county funds as may be required for the conduct of, or participation in, such programs.

designated juveniles for a period of six-months during the 2002-2003 school year (September to March) with the option of renewal for the consecutive six months period. Payment to LMB is \$410,000 for (6) months. Funds for the two contracts are provided by grants from the Price-Weingart Family Foundation (\$150,000), the California Endowment Foundation (\$150,000), and the District Attorney’s office (\$250,000.)

**Juvenile Ranch Facilities (JRF)**

Both facilities, the Rancho Del Campo and the Camp Barrett sites, are called ‘honor camps’. They are administrated by the San Diego County Probation Department and are located in isolated areas of the County, approximately 6 miles apart. Rancho Del Campo includes Rancho Del Rayo, a section specifically for youths with multiple and severe substance abuse problems. Most of the juveniles are incarcerated for relatively minor offenses. Camp Barrett, on the other hand, houses “a more criminally sophisticated population [which has] an emphasis on discipline, structure, and chemical dependency counseling.”<sup>7</sup> The cost to house a juvenile offender at the JRF is approximately \$2,008 per month or \$67 per day.<sup>8</sup> The JRF provide educational and therapeutic services for approximately 600 juveniles between the ages of 13 and 19. These include:

- A full schedule of high school classes; **Education Code §46201** mandates attendance by each juvenile who has not previously been awarded a high school diploma or earned a GED.
- Substance abuse treatment programs.
- Counseling and psychological services.

According to the San Diego Probation Department and SANDAG’s 1999 report<sup>9</sup> on prior school problems, over 75% of the adjudicated juveniles had not been in school long enough to overcome any reading limitations they might have. Table 2 shows the past school attendance records of those students.

**Table 2. School Attendance Records<sup>10</sup>**

No problems (attending, graduated or GED) 12%	Problems handled at school level 12%	Severe truancy or behavioral problems - 31%	Not attending or expelled 48%
--	---	---	----------------------------------

**Contracted Provider: Lindamood-Bell™ Learning Processes (LMB)**

<sup>7</sup> San Diego Association of Governments, Criminal Justice Research Division. *Local Detention Facilities in the San Diego Region* May, 1999, p.12. October, 2002: <[http://www.sdsheriff.net/library/local\\_jail.pdf](http://www.sdsheriff.net/library/local_jail.pdf)>

<sup>8</sup> Op. cit.

<sup>9</sup> Op. cit.

<sup>10</sup> Does not equal 100% due to rounding.

This is a privately-held corporation with headquarters in San Luis Obispo, CA. The company was started in 1979 as a research institute and incorporated in 1986 when it began offering reading programs as a commercial enterprise. It now has sites in 37 of the United States and one in London, England. Sites include contracts with over 100 school districts; many Learning Centers where individual tutoring is offered to adults and children; and various off-site locations where professional training is conducted for teachers and other professionals.

LMB's work is quite versatile, addressing "the sensory-cognitive processes that underlie reading, spelling, math, visual-motor skills, language comprehension, attention, memory and critical thinking."<sup>11</sup> The company has developed a refined bank of diagnostic tests to identify specific areas of strengths and weaknesses in a student. They also have specific tactics for strengthening any weaknesses found through the pre-tests.

The company screens, selects and trains individuals to work as 'clinicians', persons who, following the methods developed by LMB, provide students with literacy skills. While some of the LMB clinicians are certificated teachers, this is not a requirement for hiring and training.

Their teaching-learning process is very intensive. It provides 3- to 6-hour sessions, 5 days per week, for 4 to 10 weeks. The clinician-to-student ratio ranges from 1:1 to 1:5; the ideal is 1:3.

## **PROCEDURES EMPLOYED**

Grand Jurors took the following actions during their investigation:

- Attended an informational meeting conducted by Presiding Judge Milliken. Speakers included Paul Pfingst, District Attorney; Dr. Rudy Castruita, Superintendent of the San Diego County Office of Education; Paul Worthington, Director of Lindamood-Bell Learning Processes; Ms. Polly Merickel, Department Chief, San Diego County Probation Department; Ms. Sally Ingwalson, Lindamood-Bell Program Director at JRF; Dr. Cindy Burke, with the San Diego Association of Governments (SANDAG); and two juveniles participating in the program at Rancho Del Campo.
- Examined background information about LMB and its program.
- Interviewed members of the probation staff at each facility.
- Interviewed several students in the program at Rancho Del Campo and at Camp Barrett.
- Observed classes at Rancho Del Campo and Camp Barrett.
- Interviewed the LMB Program Director for JRF.

---

<sup>11</sup> Promotional pamphlet, ©1999, Lindamood-Bell Learning Processes.

- Interviewed the two County-provided teachers assigned as observers, one at each location.

## **FACTS AND FINDINGS**

These are presented here in two parts: information related to the LMB process and that related to the Grand Jurors on-site inspections.

### **LMB Implementation**

In September of 2002, LMB sent 10 of its staff, including trained clinicians, to the two detention facilities and established a reading center in each. The LMB services are to be administered to approximately 300 student detainees over the period of the current contract.

Students are placed in the LMB program according to a combination of screening processes under the guidance of the LMB Program Director at the JRF. Eligibility is first determined by the amount of time and space available in the facility and by the results of the TABE test and psychological tests administered at Juvenile Hall. A student's reading level must be at 5<sup>th</sup> grade or lower to be accepted. (At the two detention camps, 1/3 of the students read at or below fourth grade level.)

After acceptance into the program, each student is further tested by LMB to determine the specific problems that cause the individual's low reading skills. The pre-tests showed major weaknesses among the juvenile detainees to be in vocabulary, oral directions, word attack, reading fluency and reading comprehension. On that basis, three categories of training are being applied in the JRF classrooms. These are summarized below.

- **LIPS** (Lindamood Phonemic Sequencing) – how letters and words are formed with the mouth.
- **SI** (Symbol Imagery) – the ability to visually image the number, order, and identity of sounds and letters within words; that is, to have a relevant picture in the mind.
- **VV** (Visualizing and Verbalizing) – the ability to 'see' basic ideas and see the meaning of the whole rather than just individual words.

The LIPS and SI categories are used to correct what are commonly called "decoding deficits" while the VV process aims to correct common "comprehension deficits".

The accepted students attend their regular high school classes and an additional three hours per school day in one of the two LMB sessions held daily (morning and afternoon) at each facility.

A Control Group of 100 other incarcerated juveniles at the JRF, randomly selected by SANDAG, are matched to the LMB-enrolled students by such factors as age, regular school grade, primary language, etc. The Control Group members are pre-tested in the same way as the Experimental



Group, those enrolled in the LMB program. The Control Group students attend only their regular high school classes. Each LMB student and each Control Group student is post-tested at the end of 10 weeks. The results of the post-tests serve as a comparison to evaluate the success, failure, or equivalency of the Experimental Group students *versus* the Control Group students.

The LMB Program Director at JRF reported to the Grand Jurors that there was a problem getting test results from Juvenile Hall in a timely fashion. The delays resulted in a very low number of students when the LMB program began. Several weeks later, after the jurors' inspection tour, the Program Director reported that the problem has been resolved satisfactorily.

A logistical difficulty has also arisen: Many of the juveniles serve less than ten weeks in a facility. An individual might have a very brief sentence, be transferred to another facility, be granted a parole, or complete his sentence before completing the program.

### **On-site Observations**

During the Grand Jury's visits to Camp Barrett and Rancho Del Campo, several observations were made concerning the LMB learning environment, student behaviors, and discipline. Through conversations with the superintendents, probation officers, and other adults on site, we learned that:

. . . one of the ways in which discipline is enforced is through a point system. Points are given for good behavior and deducted for infractions of the JRF rules. Points are accumulated and used by the juveniles to make minor purchases; e.g., soft drinks, candy bars.

. . . regular high school hours are 8:00 am – 3:30 pm. Certificated teachers for these classes are provided by the County Office of Education.

. . . incarcerated juveniles are kept very busy: When not in school or attending special programs, they are assigned to work crews that maintain the property in and around the facility.

. . . 30 juveniles were currently enrolled in the LMB program, 15 at each site. The program was then in its 7<sup>th</sup> week.

. . . a certificated teacher is assigned by the County Office of Education to act as 'LMB observer' during class sessions. These observers file a monthly report with the County Education office.

. . . the major gain for the LMB students appeared to be their expanded vocabularies.

. . . according to several San Diego County educators familiar with both the detention camp education programs and the Lindamood-Bell™ Learning Processes, these same educators felt that, with sufficient funding and adequate staffing, they could attain the same results as those of LMB.

Further, and perhaps most important, is the insight gained from conversations with several of the participating juveniles themselves: At both facilities the students told us that their peers, other juveniles not in the LMB program, have a very negative view of the LMB participants: they are ridiculed as being “retards”.

### **Camp Barrett:**

Barrett Honor Camp Correctional Facility is the official name of the site. Housing capacity is 144 maximum. Current occupancy is 92. Typical types of crimes for which juveniles are incarcerated include assault and burglary.

Grand Jurors found the following when observing the LMB classes:

- Students appeared to be well disciplined.
- Probation Department staff members were present in the LMB classroom area.
- Students interviewed appeared highly motivated and enthusiastic; only one student did not share that view.

### **Rancho Del Campo:**

Rancho Del Campo has a housing capacity of 250. The current occupancy is 160. Inmates are incarcerated at Juvenile Ranch Facilities (JRF) for a variety of crimes ranging from drugs to auto theft. At the time of the visit the Grand Jurors found the following:

- Some juveniles were attired in dirty pants and shoes.
- Some were wearing pants very low on their hips; this, we learned, is against camp policy. When questioned about the breach of regulations one student shrugged and said, “I’ll only lose 5 points for it.”
- ‘Gang talk’ and ‘sex talk’ are common among the juveniles in the LMB program even though such talk is forbidden at the camp.
- In LMB classrooms, discipline was virtually ignored. There were no probation staff members in or near the classrooms to enforce dress infractions or to deal with discipline problems at the time of our visit.
- According to the camp director, when referring to the LMB clinicians, “They are only teachers; they can’t be expected to enforce policy.”

- One student, in a group of three, was sleeping with his head down on the table during the LMB instruction period.

### **Preliminary Results**

There were 45 juveniles initially referred for the Experimental Group and 18 for the Control Group. Following LMB on-site testing, 24 were accepted into the Experimental and 9 into the Control with no pertinent differences between the two Groups at intake. Each student was first pre-tested by LMB and then each was post-tested again at the end of ten weeks.

The first data were released by LMB, via SANDAG, on January 9, 2003.<sup>12</sup> The SANDAG report provides extensive information about the makeup of the first students accepted into the program. Included are breakdowns according to the literacy-skill components tested for, and such factors as age, criminal history, school information, etc. The information in the SANDAG report demonstrates (1) the thoroughness of LMB's research design and (2) the complexity of issues relevant to raising the literacy level of troubled teens. The data also include pre- and post-test results for 11 students in the initial Experimental Group and 3 in the initial Control Group

Although only a small sample has been tested at this time, data supports the effort to improve literacy within the juvenile detention camps. Of the 317 minors initially evaluated, 142 were found to be eligible. Of those eligible, 81 were randomized, 58 to the Experimental Group, 21 to the Control Group and 2 were non-samples. It is interesting to note that, during the student intake survey, 93% of those taking the survey thought it important to their parents or guardian that they get a good education. In addition, 90% planned to graduate or get a GED and 86% think it is important to their future to finish school.

The preliminary data indicate improvement in every area of the LMB skill-enhancement process; the improvements, although only marginal, reflect the effort of all involved. Although the data considers only 11 LMB students, the program may evolve and improve with time. More data will be needed to judge the effectiveness of the program and to justify the cost.

Out of the 11 skill areas tested, there were marginal gains for the Control Group as well as the Experimental Group in all but two—the Peabody Picture Vocabulary Test and Word Attack. In the Gray Oral Reading Test, the improvements were identical for the two Groups.

### **Recommendations for the LMB Program at Juvenile Detention Facilities:**

That the San Diego County Probation Department and the San Diego Office of Education create another Experimental Group (II) to compare the results when using certificated teachers versus LMB clinicians when the student-teacher ratio is a constant. The LMB process would continue to be taught to the original Experimental Group: while Experimental Group II would be taught by San Diego County certificated teachers. In this experiment, the

---

<sup>12</sup> Lindamood-Bell Literacy Project Research Up-date: Dr. Cynthia Burke, SANDAG, January 9, 2003.

factor to be compared would be the results when the student-teacher ratios are equivalent.

**Commendations for LMB:**

1. Judge James R. Milliken is praised for his devotion and dedication to helping juvenile offenders achieve a higher literacy level, and for identifying an innovative solution such as the LMB Program. We also praise him for his ability to convince so many individuals, agencies, and funding sources for this pilot program.
2. Credit is given to the District Attorney's Office and the San Diego County Office of Education for their involvement, financial assistance, and support.

**RECOMMENDATIONS**

**The Grand Jury recommends that the Grossmont Community College District, and the Grossmont Union High School District:**

- 03-12:** expand the MCHS program to Cuyamaca Community College.
- 03-13:** provide additional funding from high school and community college districts to ensure that longitudinal research studies are continued to measure the overall effectiveness of the MCHS program.

**The Grand Jury recommends that the San Diego County Probation Department and the San Diego County Office of Education:**

- 03-14:** create another Experimental Group (II) to compare the results when using certificated teachers versus LMB clinicians when the student-teacher ratio is a constant. The LMB process would continue to be taught to the original Experimental Group: while Experimental Group II would be taught by San Diego County certificated teachers. In this experiment, the factor to be compared would be the results when the student-teacher ratios are equivalent.
- 03-15:** compare cost effectiveness of the LMB clinicians versus San Diego County certificated teachers at the end of six-months (as described above in **03-14:**) when the student-teacher ratio remains constant.

**The Grand Jury recommends that the San Diego County Probation Department:**

- 03-16:** provide additional funding for further research, either by reallocating current educational dollars or by applying for research grants, or some other fund raising effort.

## REQUIREMENTS AND INSTRUCTIONS

The California Penal Code §933(c) requires any public agency which the Grand Jury has reviewed, and about which it has issued a final report, to comment to the Presiding Judge of the Superior Court on the findings and recommendations pertaining to matters under the control of the agency. Such comment shall be made *no later than 90 days* after the Grand Jury publishes its report (filed with the Clerk of the Court); except that in the case of a report containing findings and recommendations pertaining to a department or agency headed by an elected County official (e.g. District Attorney, Sheriff, etc.), such comment shall be made *within 60 days* to the Presiding Judge with an information copy sent to the Office of Supervisors.

Furthermore, California Penal Code §933.05(a), (b), (c), details, as follows, the manner in which such comment(s) are to be made:

- (a) As to each grand jury finding, the responding person or entity shall indicate one of the following:
  - (1) The respondent agrees with the finding
  - (2) The respondent disagrees wholly or partially with the finding, in which case the response shall specify the portion of the finding that is disputed and shall include an explanation of the reasons therefor.
- (b) As to each grand jury recommendation, the responding person or entity shall report one of the following actions:
  - (1) The recommendation has been implemented, with a summary regarding the implemented action.
  - (2) The recommendation has not yet been implemented, but will be implemented in the future, with a time frame for implementation.
  - (3) The recommendation requires further analysis, with an explanation and the scope and parameters of an analysis or study, and a time frame for the matter to be prepared for discussion by the officer or head of the agency or department being investigated or reviewed, including the governing body of the public agency when applicable. This time frame shall not exceed six months from the date of publication of the grand jury report.
  - (4) The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation therefor.
- (c) If a finding or recommendation of the grand jury addresses budgetary or personnel matters of a county agency or department headed by an elected officer, both the agency or department head and the Office of Supervisors shall respond if requested by the grand jury, but the response of the Office of Supervisors shall address only those budgetary or personnel matters over which it has some decision making authority. The response of the elected agency or department head shall address all aspects of the findings or recommendations affecting his or her agency or department.

Comments to the Presiding Judge of the Superior Court in compliance with the Penal Code §933.05 are required by the date indicated from:

<b>RESPONDING AGENCY</b>	<b>RECOMMENDATIONS</b>	<b>DATE</b>
<b>San Diego County Office of Education</b>	<b>03-14, 03-15</b>	<b>06/11/03</b>
<b>Grossmont Community College District</b>	<b>03-12, 03-13</b>	<b>06/11/03</b>
<b>Grossmont Union High School District</b>	<b>03-12, 03-13</b>	<b>06/11/03</b>
<b>San Diego County Probation Department</b>	<b>03-14, 03-15, 03-16</b>	<b>06/11/03</b>

---