



Guidance on Administrative Staffing for the CDS to SAU ECSE Transition

Purpose of This Guidance

As SAUs assume responsibility for Early Childhood Special Education (ECSE), some districts have requested funding for administrative positions to oversee the transition from Child Development Services (CDS) to SAU-led service delivery. While limited administrative support may be appropriate during this period of system change, SAUs are cautioned that administrative-heavy budgets or full-time administrative positions dedicated solely to ECSE oversight may exceed reasonable and necessary thresholds.

This guidance is intended to help SAUs structure administrative support in a manner that is fiscally appropriate, defensible, and aligned with student need.

Administrative Spending as a Percentage of the ECSE Budget

Based on statewide Year 1 expenditure data, **administration accounted for approximately 16.4% of total ECSE spending**, with a recommended planning band of **10%–20%**. These percentages reflect costs associated with coordination, supervision, compliance, and oversight - not direct service delivery. Administrative expenditure approaching or exceeding the upper end of this range should be carefully reviewed and supported by documentation demonstrating why such costs are necessary to implement IEPs and provide FAPE.

Key Risk Consideration: Full-Time Administrative Positions

SAUs are strongly cautioned that:

- Funding a full-time administrative position dedicated exclusively to ECSE administration—without direct service responsibilities—will, in many cases, consume a disproportionate share of the ECSE allocation, particularly in smaller districts.
- Administrative-heavy staffing models increase the likelihood that ECSE funds will be diverted away from direct services to children, which may:
 - Exceed recommended administrative percentage bands.
 - Trigger additional fiscal review or audit; and
 - Be determined not reasonable and necessary under ECSE funding requirements.



SAUs should not assume that the existence of transition-related work alone justifies a full-time ECSE administrative position.

Appropriate Use of Administrative Support

Administrative costs may be considered reasonable and necessary when they are:

- Directly connected to the implementation of student IEPs, child find activities, or the coordination of services required to provide a Free Appropriate Public Education (FAPE);
- Time-limited or proportionate to the size, scope, and complexity of the SAU's ECSE population; and
- Structured to support, not supplant, direct service delivery, ensuring that the majority of ECSE funds remain focused on services to children.

To support fiscal sustainability and reduce administrative burden, SAUs are strongly encouraged to explore collaborative and integrated staffing models, particularly during the transition period.

Examples of appropriate and fiscally sound approaches include:

- Assigning partial FTE administrative time, such as allocating a defined portion of an existing administrator's role to ECSE oversight;
- Embedding ECSE administrative responsibilities within an existing position, including general education leadership, or student services administration with ECSE funds supporting only the proportion of time directly attributable to ECSE work.
- Sharing an administrative position across multiple SAUs, through formal agreements or regional collaboration, to distribute costs and ensure that administrative expenses remain proportional to student count and service need.
- Utilizing shared administrative capacity across special education, early childhood, or student services, rather than creating ECSE-only positions.
- Structuring hybrid roles that include both administrative and service-related responsibilities, where appropriate and allowable; and
- Leveraging Child Development Services (CDS) Support and Service Hubs to provide administrative support, including the option for a partial-time administrator to support oversight of IEP implementation, as well as to assist SAUs with compliance, coordination, and implementation needs.

SAUs that pursue collaborative or embedded administrative models, particularly those with smaller child counts or lower overall ECSE allocations—are more likely to remain within recommended administrative spending bands and to demonstrate that administrative costs are reasonable, necessary, and proportionate to available funding, while remaining aligned with the primary purpose of ECSE funding.



Documentation and Audit Readiness

SAUs that include administrative positions or administrative stipends in their ECSE budgets should ensure that:

- The role and responsibilities are clearly documented.
- The percentage of time charged to ECSE is justified and reasonable relative to student count and service complexity.
- Administrative costs remain within the recommended planning band unless a compelling, well-documented rationale exists; and

ECSE funds must remain clearly segregated and expended from account 2213. Any direct services provided by staff in administrative positions must be tracked and accounted for separately from administrative costs. Administrative positions may be funded through a combination of ECSE, local, or federal funds; however, all cost allocations must be clearly documented to reflect the proportion of time and responsibilities attributable to ECSE. Commingling of ECSE funds with general fund administrative expenses is not permitted. Failure to align administrative staffing and cost allocation practices with these expectations may result in findings during fiscal monitoring or audit.