



UNITED STATES DEPARTMENT OF EDUCATION

JAN 07 2013

Dr. Mitchell Zais
Superintendent of Education
South Carolina State Department of Education
1429 Senate Street
Columbia, SC 29201

Dear Superintendent Zais:

During the week of September 24th, 2012, a team from the U.S. Department of Education's (ED) Office of School Turnaround (OST) reviewed the South Carolina Department of Education's (SCDE) administration of Title I, section 1003(g) (School Improvement Grants (SIG)) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended. As part of its review, the ED team interviewed staff at the State educational agency (SEA) and two local educational agencies (LEAs). The ED team also conducted site visits to two schools implementing the SIG intervention models, where they visited classes and interviewed school leadership, teachers, parents, and students. Enclosed you will find ED's final monitoring report based upon this review.

The primary purpose of monitoring is to ensure that the SEA carries out the SIG program consistent with the final requirements. Additionally, ED is using its monitoring review to observe how LEAs and schools are implementing the selected intervention models and identify areas where technical assistance may be needed to support effective program implementation.

In line with these aims, the enclosed monitoring report is organized in three sections: (1) *Summary and Observation*, (2) *Technical Assistance Recommendations*, and (3) *Monitoring Findings*. The *Summary and Observations* section describes the SIG implementation occurring in the schools and districts visited, initial indicators of success, and any outstanding challenges relating to implementation. The *Technical Assistance Recommendations* section contains strategies and resources for addressing technical assistance needs identified during ED's visit. Finally, the *Monitoring Findings* section identifies any compliance issues within the six indicator areas reviewed and corrective actions that the SEA is required to take. Note that an addendum containing the *Summary and Observations* will be released at a future date.

The SCDE has 30 business days from receipt of this report to respond to all of the compliance issues contained herein. ED staff will review your response for sufficiency and will determine which areas are acceptable and which require further documentation of implementation. ED will allow 30 business days for receipt of this further documentation, if required. ED recognizes that some corrective actions may require longer than the prescribed 30 days, and in these instances, will work with the SCDE to determine a reasonable timeline. In those instances where additional time is required to implement specific corrective actions, you must submit a request for such an extension in writing to ED, including a timeline for completion for all related actions.

Each State that participates in an onsite monitoring review and that has significant compliance findings in one or more of the programs monitored will have a condition placed on that program's grant award specifying that the State must submit (and receive approval of) documentation that all compliance issues identified in the monitoring report have been corrected. When documentation sufficient to address all compliance areas has been submitted and approved, ED will then remove the condition from your grant award.

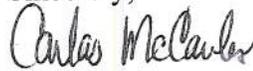
With regards to the *Technical Assistance Recommendations* provided, we encourage you to employ these strategies to further support the effective implementation of the SIG program. ED staff will follow up with your staff over the next few months to see how the SCDE is working to address these issues and make use of this technical assistance.

Please be aware that the observations reported, issues identified, and findings made in the enclosed report are based on written documentation or information provided to ED by SEA, LEA, or school staff during interviews. They also reflect the status of compliance in South Carolina at the time and locations of ED's onsite review. The SCDE may receive further communication from ED that will require it to address noncompliance occurring prior or subsequent to the onsite visit.

The ED team would like to thank the SCDE staff for their hard work and the assistance they provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to working further with your staff to resolve the issues contained in this report and to improve the quality of the SIG program in South Carolina.

Sincerely,



Carlos McCauley
Group Leader
Office of School Turnaround

Enclosure

cc: Jesulon Gibbs-Brown, Director, Office of School Transformation

**South Carolina
Targeted Monitoring Review of
School Improvement Grants (SIG) under section 1003(g) of the
Elementary and Secondary Education Act of 1965, as Amended
September 24- September 27, 2012**

BACKGROUND

Overview of Cohort I SIG Schools in South Carolina		
Tier	Number of Eligible SIG Schools	Number of Served SIG Schools
Tier I	15	09
Tier II	13	10
Tier III	0	0

Implementation of Cohort I SIG School Intervention Models	
Models	Number of Schools Implementing the Model
Turnaround	0
Transformation	18
Restart	0
Closure	1

Overview of Cohort II SIG Schools in South Carolina		
Tier	Number of Eligible SIG Schools	Number of Served SIG Schools
Tier I	9	5
Tier II	9	3
Tier III	6	0

Implementation of Cohort II SIG School Intervention Models	
Models	Number of Schools Implementing the Model
Turnaround	0
Transformation	7
Restart	0
Closure	1

MONITORING VISIT INFORMATION

Monitoring Visits	
LEA Visited School Visited Model Implemented FY 2009 Funding Awarded <i>(over three years)</i>	Charleston Public Schools Morningside Middle School Transformation <i>LEA Award (for 2 SIG schools): \$4,601,535</i> <i>Morningside Middle School SIG funding: \$2,070,691</i>
LEA Visited School Visited Model Implemented FY 2010 Funding Awarded	School District of Newberry County Newberry High School Transformation <i>LEA Award (for 1 SIG school): \$902,443</i> <i>Newberry High School SIG funding: \$880,208</i>
SEA Visited	South Carolina Department of Education

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FY 2009 SIG Award	\$ 50,811,120	
FY 2010 SIG Award	\$ 8,067,374	
FY 2011 SIG Award	\$ 8,138,851	
Interviews Conducted		
<ul style="list-style-type: none"> ➤ <i>South Carolina Department of Education Staff:</i> Program Director, Education Associate, Program Assistant, Council 180 member ➤ <i>Charleston Public Schools Staff</i> ➤ <i>Morningside Middle School Staff:</i> Principal, School Leadership Team, 9 Teachers, 5 Parents, Students, and 6 Classroom Visits ➤ <i>School District of Newberry County Staff</i> ➤ <i>Newberry High School Staff:</i> Principal, School Leadership Team, 8 Teachers, 7 Parents, Students, and 4 Classroom Visits 		
U.S. Department of Education Staff		
Team Leader	Carlas McCauley	
Staff Onsite	Michael Wells and Christopher Tate	

OVERVIEW OF MONITORING REPORT

The following report is based on the U.S. Department of Education’s (ED) onsite monitoring visit to South Carolina from September 24 to September 28, 2012 and review of documentation provided by the State educational agency (SEA), local educational agencies (LEAs), and schools. The report consists of two sections: *Technical Assistance Recommendations* and *Monitoring Findings*. The *Technical Assistance Recommendations* section identifies strategies and resources for addressing technical assistance needs. The *Monitoring Findings* section identifies areas where the SEA is not in compliance with the final requirements of the SIG program and indicates required actions that the SEA must take to resolve the findings.

The Department will later issue a *Summary and Observations* addendum that describes the implementation of the SIG program by the SEA, LEAs, and schools visited; initial indicators of success; and any outstanding challenges being faced in implementation. That addendum will focus on how the SEA, LEAs, and schools visited are implementing the SIG program with respect to the following five areas: school climate, teachers and leaders, instructional strategies and time, use of data, and technical assistance.

TECHNICAL ASSISTANCE RECOMMENDATIONS

This section addresses areas where additional technical assistance may be needed to improve the quality of SIG program implementation.

Issue 1: Newberry High School had implemented strategies to engage community members and families. However, school leadership felt there was more work to be done in forming community partnerships with businesses that are educational and incentivized.

Technical Assistance Strategies:

- Provide SCDE resources on effective strategies for creating community-based partnerships with businesses (Responsibility: ED).
- Provide focused technical assistance to LEAs on strategies and methods to improve outreach to the business community regarding turnaround reform efforts occurring in each districts' schools, such as:
 - Sharing school and business relationship practices from schools in the State that are educational;
 - Preparing letters and informational packets for LEAs and schools to use to introduce businesses to the SIG program and identify specific areas of education need that businesses can be a resource for; and,
 - Helping LEAs develop plans to engage businesses to develop educational programs that support SIG implementation (Responsibility: SCDE).
- Develop a plan or a set of strategies that districts will use to involve community businesses in SIG implementation (Responsibility: LEA).

Issue 2: Each district requested that the State provide targeted feedback based on their quarterly reports on implementation.

Technical Assistance Strategies:

- Identify resources and provide targeted assistance to LEAs based upon data collected through quarterly reports to support full implementation of SIG (Responsibility: SCDE).

Issue 3: Charleston Public Schools has two schools in cohort 1 that will exit the SIG program at the end of the 2012-2013 school year. District staff expressed concern about how best to continue to support school transformation at the end of the award. Strategies for sustaining reforms implemented with SIG were unclear.

Technical Assistance Strategies:

- Provide SCDE resources on effective strategies for sustaining activities and strategies implemented through the SIG program (Responsibility: ED).

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- Provide focused technical assistance to LEAs on strategies and methods to sustain strategies implemented through the SIG program, such as:
 - Conducting a comprehensive review of programmatic activities to identify sustainable resource constraints for cohort 1 SIG schools;
 - Preparing a targeted plan, in conjunction with cohort 1 LEAs, that aligns resources to continue the implementation of school transformation strategies;
 - Adopting a plan to provide targeted assistance to cohort 2 schools well in advance of the start of the third year of implementation; and,
 - Providing information regarding options for SEA support and resources to LEAs to continue turnaround activities after SIG funds are no longer available (Responsibility: SCDE).

- Identify resources and strategies to sustain transformation in SIG schools and adopt a comprehensive plan for continued school turnaround upon exiting the SIG program (Responsibility: LEA).

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MONITORING FINDINGS

Summary of Monitoring Indicators

Critical Element	Requirement	Status	Page
1. Application Process	The SEA ensures that its application process was carried out consistent with the final requirements of the SIG program. [Sections I and II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	NA	NA
2. Implementation	The SEA ensures that the SIG intervention models are being implemented consistent with the final requirements of the SIG program. [Sections I and II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Finding	7
3. Fiscal	The SEA ensures LEAs and schools are using funds consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)) ; §1114 of the ESEA; and Office of Management and Budget (OMB) Circular A-87]	Finding	8
4. Technical Assistance	The SEA ensures that technical assistance is provided to its LEAs consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	NA	NA
5. Monitoring	The SEA ensures that monitoring of LEAs and schools is being conducted consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended	Finding	8

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	(75 FR 66363 (October 28, 2010))]		
6. Data Collection	The SEA ensures that data are being collected consistent with the final requirements of the SIG program. [Sections II and III of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	NA	NA

Monitoring Area: School Improvement Grant

Finding 1: The SCDE has not ensured that Charleston Public Schools and the School District of Newberry County are establishing schedules and implementing strategies that increase learning time in compliance with the transformation model requirements. Morningside Middle School had added 20 minutes to the school day; however, given the restructuring of the schedule to accommodate late buses it was unclear the amount of additional instructional time being added to the day. Newberry High School has gained additional instructional time by restructuring the master calendar and providing additional learning opportunities (credit recovery, tutoring, extended semester programming for grade improvement, and daily content recovery).

Citation: Section I.A.2 (a)(1)(viii) of the final requirements states that an LEA implementing the SIG program must “establish schedules and implement strategies that provide increased learning time.” Section I.A.3 of the final requirements defines *increased learning time* as “using a longer school day, week, or year schedule to significantly increase the total number of school hours to include additional time for (a) instruction in core academic subjects including English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history, and geography; (b) instruction in other subjects and enrichment activities that contribute to a well-rounded education, including, for example, physical education, service learning, and experiential and work-based learning opportunities that are provided by partnering, as appropriate, with other organizations; and (c) teachers to collaborate, plan, and engage in professional development within and across grades and subjects.” (75 FR 66363 (October 28, 2010)).

Further action required: The SCDE must submit evidence to ED that it has reviewed each LEA that received SIG funds to implement the turnaround and transformation model to determine if increased learning time is being provided consistent with the SIG final requirements. The SCDE must submit to ED a timeline for implementation of increased learning for any school it determines is not currently doing so.

Finding 2: The SCDE has not ensured that the School District of Newberry County is fully implementing the transformation model in Newberry High School. While the school has implemented all aspects of the transformation model in its ninth and tenth grade classrooms, the school is not scaling up interventions and implementing the required activities in the eleventh and twelfth grades.

Citation: Section I.A.2 of the final requirements stipulates, as part of the transformation model, that an LEA “agrees to implement, and demonstrates the capacity to implement fully and effectively,” its chosen model. Further, Section I.A.2 (d) of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended outline the transformation requirements that must be fully adopted during implementation as a part of a whole school reform (75 FR 66363 (October 28, 2010)).

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Further Action Required: Within 30 days of this report, the SCDE must submit to ED a plan for fully implementing the transformation model in Newberry High School by the end of the 2012-2013 school year. The SCDE must submit evidence that Newberry High School is implementing the model by the end of the 2012-2013 school year. Furthermore, the SCDE must submit evidence that all schools implementing the transformation model are fully implementing the entire model consistent with the SIG final requirements.

Finding 3: The SCDE did not ensure that LEAs monitor SIG schools consistent with the requirements of the Department. Although the SCDE and the LEAs monitored are providing ongoing technical assistance to the schools in the SIG program, an independent monitoring process has not been established in either district visited.

Citation: Section 80.40 of the Education Department General Administrative Regulations (EDGAR) states that grantees must monitor grant and sub-grant activities to ensure compliance with applicable Federal requirements. Section 9304(a) of the ESEA requires that the SEA must ensure that (1) programs authorized under the ESEA are administered in accordance with all applicable statutes, regulations, program plans, and applications; and (2) the State will use fiscal control and funds accounting procedures that will ensure the proper disbursement of and accounting for Federal funds.

Further action required: The SCDE must submit to ED a monitoring plan that includes the process and timeline that LEAs must implement to monitor schools in the SIG program. The SCDE must also submit to ED evidence that this information has been communicated to LEAs.

Finding 4: The SCDE's Office of Transformation, in preparation for the monitoring visit, completed an audit of SIG grant awards and identified the misallocation of funds to Charleston Public Schools. The Office of Transformation allocated larger awards to Charleston Public Schools than requested by increasing the amount awarded to the district to cover administrative costs.

Citation: Section 9304(a) of the ESEA requires that the SEA must ensure that (1) programs authorized under the ESEA are administered in accordance with all applicable statutes, regulations, program plans, and applications; and (2) the State will use fiscal control and funds accounting procedures that will ensure the proper disbursement of and accounting for Federal funds.

Further action required: Within 30 days of this report, the SCDE must conduct, and submit to ED, a review of all SIG awards to ensure that funds were allocated in accordance with the requirements and guidance of the SIG program.