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Education and Safety Issues at the South Carolina School for the Deaf and the Blind

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Synopsis

Members of the General Assembly requested that we conduct an audit of the South Carolina School for the Deaf and the Blind (SCSDB). The school, located in Spartanburg, S.C., provides instruction and a residential program to deaf, blind, and multi-handicapped children. Because the audit requesters were primarily concerned with students' educational outcomes and issues of student safety, we established our audit objectives in those areas. Our findings include the following.

!   We conducted a statistical sample of 105 student individualized education programs (IEPs). We found no significant areas of non-compliance, although some weaknesses were identified. Areas where documentation could be improved include transition plans for students over age 16, behavior intervention plans, and assistive technology assessments.

!   SCSDB must develop plans to help students transition from the school to work or post-secondary education. All of the transition plans in our review were vague and not individualized. However, the school has recognized the problems in the program and has taken steps to improve transition services.

!   The federal Individuals with Disabilities Education Act (IDEA) requires that, if a child's behavior is interfering with his or her education, the school must deal with the behavior in order for the child to learn. During our review of student IEPs, we did not find documentation of any functional behavior assessments and found only two behavior intervention plans. To comply with the IDEA, the school has recently begun expanding its behavior program.

!   We reviewed the curriculum and practices at the multi-handicapped school to determine if they supported the goal of independent living for these students. We concluded that all goals in the IEPs in the multi-handicapped school are geared toward getting students ready to transition from the school back into their own communities.

!   We reviewed SCSDB's graduation rates and school report card results and found that many SCSDB students do not attain a high school diploma. In FY 01-02, 26% of the seniors graduating from the deaf school and 78% of the seniors graduating from the blind school received a state high school diploma. Many students have significant academic delays because of their hearing or vision problems.

! We reviewed the procedures used to shut down a program for deaf students whose behavior restricted them from learning in the regular special education classroom. We determined that the local school districts were not always invited to the placement meetings at least 7 days prior to the meeting date, as required. Although each student had multiple meetings to determine the correct placement, there was insufficient documentation to show whether representatives of the local school districts came to the placement meetings.

! We reviewed a sample of student safety and health (student advocacy) files, including accident/injury reports, internal investigations, and cases that were referred to the Department of Social Services, and found that these cases were handled properly and documented according to policy.

! We reviewed a sample of residential advisor personnel and training files to determine if this staff was properly trained and found that only 5 of 12 residential advisors in our sample had all of the required training.

! The school has made progress in recent years in addressing safety issues on campus. The school has also complied with an Office for Civil Rights (OCR) requirement to report its safety findings every 45 days.

! One of the issues raised in the 1999 complaint to the Office for Civil Rights was the condition and safety of the buildings on the SCSDB campus. After the school had begun a $12 million renovation to Walker Hall, the school's oldest building and "focal point" of the campus in 2000, SCSDB obtained a master facilities plan which showed that key buildings used or occupied by students had problems meeting safety and Americans with Disabilities Act (ADA) requirements. The estimated cost to renovate or replace six of these buildings was $23 million. As of spring 2003, SCSDB had received $1.5 million in funding for one of the buildings.

Introduction

Audit Objectives

Members of the General Assembly requested that we conduct an audit of the South Carolina School for the Deaf and the Blind (SCSDB). The school, located in Spartanburg, S.C., provides instruction and a residential program to deaf, blind, and multi-handicapped children.

The audit request contained a detailed list of concerns about the school. After reviewing the requesters' concerns and obtaining preliminary information from the agency, we established our audit objectives in two main areas C education and student safety. Specific audit objectives included:

! Determine how the school allocates financial resources.
! Sample students' individualized education programs (IEPs) to review goals and compliance with state and federal requirements.
! Review curriculum and practices at multi-handicapped school to determine if they support the goal of independent living for these students.
! Review SCSDB graduation rates and test scores as a measure of educational outcomes.
! Review admittance and termination criteria to ensure they are relevant to the school's mission and role in special education.
! Determine whether teachers, principals, and other educational staff are properly certified and how staff vacancies are filled.
! Determine if SCSDB policies and procedures for student safety and advocacy are reasonable and adequate.
! Review management of SCSDB school buses for safety.
! Determine how SCSDB responded to the issues raised in a 1999 complaint to the federal Office for Civil Rights (OCR) in the Department of Health and Human Services (HHS), and whether the school has been involved in other OCR complaints, lawsuits, or claims filed with the Insurance Reserve Fund since 1999B2000.
! Review funding and plans for capital improvement projects and determine what progress the school has made in correcting facility problems.

See Appendix A for a discussion of the audit scope and methodology.

Background

The South Carolina School for the Deaf and the Blind (SCSDB) was originally established in 1849 as a private institution by the Reverend Newton Pinckney Walker. The school property and surrounding land at Cedar Spring in Spartanburg County were purchased by the state in 1856. The school has expanded from a single building (Walker Hall), to a 166-acre campus with 37 buildings.

SCSDB offers primary and secondary education to children with severe visual and hearing impairments from across the state. The school has four educational programs:

! The school for the deaf.
! The school for the blind.
! The school for the multi-handicapped (students must have a hearing or visual impairment and a second disabling condition).
! A post-secondary program for vocational training.

SCSDB also operates a statewide outreach and early intervention program. The school offers a residential program for students who do not live within a 35-mile radius of the school. The residential program includes after-school sports, tutoring, and other activities. The students live at the school during the week and are bused home on weekends. In FY 01-02, approximately 68% were residential students.

Total enrollment for SCSDB in FY 02-03 was 413 including the post-secondary students (see Table 1.1). While enrollment in the school fluctuates from year to year, it has been slowly declining and dropped 19% over a 12-year period (since FY 90-91). The majority of deaf and/or blind students in South Carolina are served in their home school districts.

Table 1.1: SCSDB Student Enrollment

	FY 00-01	FY 01-02	FY 02-03
Deaf School	159	136	145
Blind School	57	57	63
Multi-Handicapped School	133	129	137
Post-Secondary Program	62	79	68
TOTAL	411	401	413

Source: S.C. School for the Deaf and the Blind.

The school has a board of ten members appointed by the Governor. Each of the six Congressional districts is represented by one member, and there are four members at-large. One of the members at-large must be deaf, one must be blind, one must represent the interests of multi-handicapped persons, and one must represent the general public. The state Superintendent of Education and the executive officer of the Department of Health and Environmental Control are ex officio members. The board is vested with the "supervision and control" of the school and hires the school president as the immediate executive head of the school.

Since SCSDB is a public school, both tuition and room and board are free. Students pay a $40 activity fee. The school receives a state general fund appropriation as well as funding from other sources such as grants and federal monies. State general fund appropriations declined from $15.2 million for FY 00-01 to $12.6 million for FY 02-03. Table 1.2 shows expenditures from all sources of funds for the past two fiscal years and the adjusted appropriation (after budget cuts) for FY 02-03. As of January 31, 2003, SCSDB had a total of 412 employees.

**Table 1.2: SCSDB Finances
FY 00-01 — FY 02-03 (All Funds)**

	EXPENDITURES		APPROPRIATION
	FY 00-01	FY 01-02	*FY 02-03
Administration	$2,957,521	$2,576,026	**$3,193,525
Operation and Maintenance	4,245,267	4,825,300	2,534,636
Student Support Services	3,565,483	3,540,065	3,674,669
Outreach Services	2,776,063	2,669,712	4,351,042
Multi-Handicapped School	2,129,854	2,275,386	2,115,475
Deaf School	2,032,725	2,015,296	2,284,513
Blind School	1,719,813	1,735,458	1,886,472
Residential Program	2,461,767	2,581,554	2,046,144
Subtotal	$21,888,493	$22,218,797	$22,086,476
Debt Service and Permanent Improvements	$2,079,196	$1,772,702	$8,518,556
TOTAL (Including Capital Improvements)	$23,967,689	$23,991,499	$30,605,032

* Adjusted appropriation after budget cuts.
** FY 02-03 budget for administration includes extra operating funds which will be spent by other divisions.

Source: SC Comptroller General and SCSDB.

Cost Per Student

The average cost was approximately $57,000 per year per residential student for FY 01-02. Chart 1.3 shows the categories of expenditures that made up this total cost (see Appendix A for discussion of the methodology).

The per student cost is significantly more than the cost for educating handicapped students in their own school districts. SDE does not have information on the total cost of educating students with handicaps. Its cost per student information is limited to the instructional costs and excludes other costs such as the cost of support services provided to handicapped students. However, limiting the comparison to instructional costs, we found that the statewide average in FY 01-02 for district instructional expenditures was approximately $11,000 for a deaf student and $8,400 for a blind student. SCSDB's average instructional cost was $16,764. Also, SCSDB has residential costs that the school districts do not.

Chart 1.3: SCSDB Residential Per Pupil Costs FY 01-02

$57,259
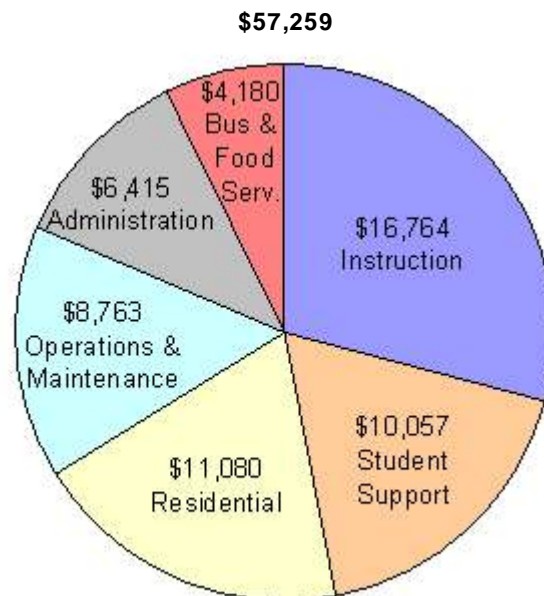
Educational Issues

We reviewed several issues involving the education provided to students at the School for the Deaf and the Blind. We focused a large part of our field work on reviewing the individualized education programs (IEPs) for a sample of students in order to identify what kinds of special services were provided and how the school met state and federal requirements for special education. We also reviewed:

! Transitional services offered by the school.
! The development of a comprehensive program for children with behavior problems.
! The curriculum and practices of the school for the multi-handicapped.
! The extent to which students were graduating with a high school diploma.
! Other measures of educational success such as a survey of school graduates and the school's report card.

We concluded that, in general, the school has complied with special education requirements, although improvements are recommended for some areas. The school is seeking to develop its transition and behavior management services in a way to better meet student needs.

Special Education Requirements

The Individuals with Disabilities Education Act (IDEA), a federal law, establishes educational requirements and safeguards for children with disabilities. A major purpose of the IDEA is to ensure that all children with disabilities receive a "free appropriate public education that emphasizes special education and related services designed to meet their unique needs and prepare them for employment and independent living."

The way that schools ensure each student receives services required under the IDEA is the individualized education program (IEP). Two general purposes of the IEP are: (1) to establish measurable annual goals; and (2) to state the special education, related services, and supplementary aids that the public agency will provide to the child. The IEP is developed by a team that must include a representative of the school district/agency, teachers, one or both parents or guardian, the student (when appropriate), a career and technical education representative for students over 15, and any representative of any other agency that is likely to be responsible for providing or paying for transition services. The Individuals with Disabilities Education Act requires that, among other things, the IEP include:

! A statement of the child's present levels of educational performance.
! Measurable annual goals, including benchmarks or short-term objectives.

!   A statement of the special education and related services and
    supplementary aids and services to be provided to the child.
!   An explanation of the reason and extent why the child will not participate
    with nondisabled children in a regular class, in the general curriculum,
    and in extracurricular and other nonacademic activities.
!   A statement of how the child's progress toward the annual goals will be
    measured, and that parents will be regularly informed (through such
    means as report cards) of progress toward the annual goals.

Review of Individualized Education Programs (IEPs)

Because the IEP is the cornerstone of special education, and to determine if
SCSDB complies with both state and federal requirements of the IDEA, we
conducted a statistical sample of 105 individualized education programs
(IEPs) including those for students in each of the three schools (see
Appendix A for methodology). We also reviewed student permanent file
folders to obtain information about test scores, assessments, and progress
reports.

Results

Our review of student IEPs and permanent file folders found no significant
areas of non-compliance. We found some weaknesses C transition plans for
students over age 16 were vague and not individualized, and we could not
find adequate documentation regarding behavior intervention plans and
assistive technology assessments.

Identifying Student Needs and Providing Services

We found that the majority of students were assessed by teachers,
audiologists, speech, physical, and occupational therapists. By law, any
weaknesses identified through the assessment process must be addressed by
the IEP goals. We found that there were goals for each area assessed in all
the files we reviewed.

Students in the multi-handicapped school received the most support services
(speech, physical therapy, and orientation and mobility); 77% received at
least one related service in addition to instruction in academic subjects,
independent living, and pre-vocational training. Students in the blind school
were also assessed to determine if they needed instruction in Braille.
Seventy-five percent of these students were receiving orientation and
mobility or other related services, and 42% were determined to need Braille
instruction. Students in the deaf high school were receiving the fewest related
services; speech therapy was provided to 16 of the 40 students in our sample
and two other students were receiving counseling.

Attendance at IEP Meetings

We found that, on average, students at SCSDB had five people attend their IEP meetings. We found documentation that all three schools were consistently inviting parents to IEP meetings at least 10 days before the meeting date (96%) and that parents were attending IEP meetings for their children on a consistent basis (73%). When parents did not respond to the IEP letter of invitation, we found documentation that schools were attempting to contact the parents by letter or phone call in approximately one-half of the cases. We also found that of students age 16 and older, who are encouraged to attend their IEP meetings, 63% were attending them.

We found that communication between parents and teachers was consistent in both the blind high school and the multi-handicapped school. Each student enrolled at SCSDB has a phone/contact sheet found in his or her permanent file which documents communication between the school and home; however, 80% of students in the deaf high school had no documentation of parent/teacher communication on their contact sheets.

Repetition of Goals

We wanted to see if goals in the IEP plans changed from year to year, thus indicating that students were making progress. We were able to review two years' worth of goals for most but not all of the students in our sample. We found that, for the multi-handicapped school, about 53% (28) of the files we reviewed had at least one goal that was repeated from the previous year. In some cases the students had not mastered the goals, but in other cases the progress reports indicated the goal was mastered. According to SCSDB staff, goals are sometimes repeated in the IEPs because of the multiple obstacles many of the students in this school face and the need to learn a skill in a variety of settings.

Progress Reports

In order to document student progress, teachers report student progress every nine weeks. We found that 19 (48%) of the 40 students in the deaf high school in our sample did not have progress reports for every nine weeks. However, in the multi-handicapped school, 89% of students had up-to-date progress reports in their files. In August 2003, SCSDB officials reported that the progress reports were done, but had not been filed at the time of our review.

Eligibility Meeting

Prospective students must apply to the school and each admission decision is made by a team of participants from SCSDB staff. By law, a representative from the child's local school district must be invited to the eligibility meeting and the initial placement meeting to ensure that the most appropriate educational options are considered. In our review, we found letters documenting that the local school district was invited to the eligibility meetings only 67% of the time. In some cases, the child had been admitted to SCSDB many years ago, and the initial letter to the school district may have been lost or simply not filed in the permanent file (see p. 16).

Standardized Tests

We found that students at SCSDB are consistently being tested on standardized tests each year. However, only 21 of the 30 eligible students (10th B 12th graders) in the deaf or blind high school in our sample took the high school exit exam for the 2001B2002 school year.

Assistive Technology Assessments

State and federal laws require local school districts to provide assessments and education-related assistive technology devices and services for all children from ages 3 to 21. Assistive technology devices are defined as "any item, piece of equipment, or product system that is used to increase, maintain, or improve the functional capabilities of a child with a disability." In our IEP review, we were unable to find documentation of a single assistive technology evaluation. Because so much of what is used in the classroom each day at SCSDB is considered assistive technology, teachers have informally considered what assistive technology may work best for the individual student.

Recommendation

1. The School for the Deaf and the Blind staff should:

   ! Ensure that if an IEP goal from a previous year is to be repeated in the current IEP, that it is still an appropriate goal for the student.
   ! File progress reports in the student permanent file in a timely manner.
   ! Ensure that they document that local school districts were invited to eligibility meetings.
   ! Place assistive technology assessments into the student permanent file.

Transition Services

The Individuals with Disabilities Education Act (IDEA) requires transition planning for all special education students when they turn 16 in order to help them make the adjustment to work or post-secondary education after they graduate. Transition plans are supposed to be based on the child's individual needs, taking into account his or her preferences and interests; and should include instruction, related services, community experience, the development of employment and other post-school adult living objectives, and if appropriate, daily living skills, and a functional vocational evaluation. Our review found that all transition plans in the deaf, blind, and multi-handicapped schools were vague and not individualized. However, the school has recognized the problems in the program and has taken several steps to improve transition services at the school:

! In 1999, a new occupational diploma was designed, based on a four-year curriculum called META (Merging Employment, Transition, and Academics). The occupational diploma curriculum includes functional academics, vocational classes, job shadowing and mentoring, work experience (paid and unpaid), career portfolios, and transition classes. Students who graduate with the occupational diploma will be qualified to work in competitive entry-level employment.

! SCSDB has received grant money to develop a full-time GED program for deaf students. The program will provide pre-GED assessment and will provide tutoring for these students for two years.

The transition services program is working to make the transition IEP goals more specific and to tailor the transition plans more to the individual needs of the student. To help students transition back into their home communities, the school has assigned staff to visit students in their home communities in order to evaluate the local job market and to determine what kinds of supports (such as public transportation) are available.

Recommendation

2. The School for the Deaf and the Blind should continue its plans to improve transition goals and services for students to ensure it provides for students' individual needs and helps students to live as independently as possible.

Behavior Program

When we reviewed the IEP and permanent files, we did not find documentation of any functional behavior assessments and found only two behavior intervention plans. The director of behavior services provided information showing that six of the students in our sample should have evidence of a behavior support plan in their IEP files. The IDEA requires that, if a child's behavior is interfering with his or her education, the school must deal with the behavior in order for the child to learn. To comply with the IDEA, in June 2002 SCSDB began expanding its behavior program.

The goals of the new behavior program are to determine why children are acting out and to provide students an alternative behavior for achieving the same result. When a child cannot be managed using the student code of conduct, behavior specialists must go through a formal process of evaluating the child:

! The behavior specialist completes a functional behavior assessment by observing the student and then determining the best course of action for the student.
! An alternative acceptable replacement behavior for the bad behavior is created and recorded in a behavior intervention plan (BIP). The plan contains the broad behavioral goals that the behavior program is working to replace.
! Teachers and administrators use a behavioral support plan to carry out the BIP on a daily basis; this is a day-to-day guide to reaching the goals.
! When a child needs more than the traditional behavior treatment, and a behavior interventionist is needed to reside with the child throughout the day to monitor behavior, the child may become enrolled in a program for children who need medical, behavioral, and counseling services. There is a separate evaluation and plan for this program because Medicaid may be used to fund it.

Because the IEP plans we reviewed were created in spring 2002, we were not able to evaluate the success of this program at this time. The school will be tracking individual students to see if their behavioral problems subside with the intensive interventions and supports.

Recommendation

3. The School for the Deaf and the Blind staff should place a copy of behavior intervention plans into the student IEP file and place the functional behavior assessments in the permanent file.

Curriculum and Practices for the Multi-Handicapped School

One of our audit objectives was to review the curriculum and practices at the multi-handicapped school to determine if they supported the goal of independent living for these students. In our IEP review, we found that these students have an average of six IEP goals each year, and 77% are receiving support services. We concluded that all goals in the IEPs in the multi-handicapped school are geared toward getting students ready to transition from the school back into their own communities.

All students in the multi-handicapped school are either hearing or visually impaired and have at least one additional disability. In our sample, we found that all of the multi-handicapped students had a mental disability and 47% had a third disability, such as an orthopedic disability. The curriculum focuses on students' basic needs for mobility, communication, and daily living. Students are taught to develop skills that will enable them to hold a job and live in a supervised environment, such as learning to count correct change or fill out a job application correctly. According to SCSDB administration, the curriculum is designed to be developmental in nature, not to provide credits for a high school diploma. Students in the school are not mainstreamed for any portion of the school day. Students that graduate from the multi-handicapped school receive a state certificate of attendance.

The multi-handicapped students have the opportunity to practice their independence by residing in the school's Independent Living House during their senior year for a period of five weeks. There, groups of students (usually 5) practice a variety of independent living skills such as cooking, cleaning, working, and money management. Since January, the Independent Living House has served 65 multi-handicapped students during the week in a regular class setting and 25 students who stayed overnight.

A program provided through the Independent Living House, called Working Wheels, allows the students to gain work experience. The program sets up jobs for junior and senior students in the community. Each Wednesday students are taken to their jobs, where instructors teach them how to do the work, supervise the students, and bring them back to school. The program is designed for students who may not be able to participate in the school's career and technology program, but who could do something meaningful if given the proper training and experience. The students who take part in the program are not paid; they are there to gain the experience of having to go to work and to report to an employer. Students from the Working Wheels program have worked at an athletic center, in a hospital, and at a church over the past year.

Educational Outcomes

We reviewed SCSDB's graduation rates and school report card results as a measure of the effectiveness of the school. What happens to students after graduating from the school C whether they go into a job or post-secondary education C is also a critical measure of the school's success. We found that many SCSDB students did not attain a state high school diploma. However, we also found that SCSDB is improving its process for helping students make the transition from school to work or higher education. The agency is also focusing its efforts on the school report card and students' mastery of individual education goals. These topics are discussed in detail below.

Graduation and Diploma Rates

In order to graduate with a high school diploma in South Carolina, all students, including special education students, must have 24 credits in core subjects (math, language arts, science, history, foreign language) and must pass the state exit exam. SCSDB students who have the required coursework but cannot pass the exit exam are issued a state certificate; those who also do not have the course credits receive an SCSDB certificate of attendance. In FY 01-02, 26% of the seniors graduating from the deaf high school and 78% graduating from the blind high school earned a diploma; the rest received certificates. Students in the multi-handicapped school receive certificates of attendance from the school.

Table 2.1 shows SCSDB graduation rates compared with deaf and blind students in the state's other school districts, taking into account students who earn the diploma after graduation. This data is reported to the State Department of Education (SDE) annually for a federal report. SDE collects this information from SCSDB and the school districts but does not verify it.

Table 2.1: Percent of Students Graduating with a Diploma or a Certificate FY 01-02

DEAF SCHOOL FY 01-02		
	SCSDB	STATE
Graduated with H.S. Diploma	5 (26%)	28 (34%)
Received a Certificate of Attendance	5 (26%)	14 (17%)
Other*	9 (47%)	40 (49%)
TOTAL	19 (100%)	82 (100%)
BLIND SCHOOL FY 01-02		
	SCSDB	STATE
Graduated with H.S. Diploma	7 (78%)	10 (45%)
Received a Certificate of Attendance	1 (11%)	3 (14%)
Other*	1 (11%)	9 (41%)
TOTAL	9 (100%)	22 (100%)

* Other includes those no longer in special education and those who moved or dropped out of school.

Source: State Department of Education, Office of Exceptional Children.

For FY 02-03, none of the 12 SCSDB graduates of the deaf and blind schools received a state high school diploma (5 received the new occupational diploma). Several students plan to re-take the exit exam during the summer or fall.

According to officials who work with the deaf and blind populations, there are many reasons why more students do not earn a regular high school diploma.

! Sensory-impaired students have particular difficulties with reading and math. We saw this illustrated in the assessment portion of the students' IEPs, which showed that the majority of students had language arts, math, and reading skills well below grade level. Students who do not acquire language skills at a normal age face barriers in trying to learn these skills when they are older.

! Many of the students in the blind and deaf schools have lower than average academic capabilities, based on standardized IQ tests. In our IEP review, we found that 18% of the blind students and 15% of the deaf students in grades 9B12, in FY 02-03, had IQs in the mild range of mental disability.

! The average age of entry to SCSDB is almost nine. Many of the students at SCSDB attended public school in their home districts before coming to SCSDB, and enroll in SCSDB as a "last resort" or because they "can't make it" in their home school districts. In fact, SDE regulations require that all disabled students be educated in a "least restrictive environment." SCSDB, as a residential institution, is *not* considered a least restrictive environment, so it is an appropriate setting only for those children who, for whatever reason, cannot receive an appropriate education in their regular schools.

! According to the school report card, 81% of students at SCSDB are from low-income families. National education statistics show that students from low-income families in general have lower rates of graduation with a high school diploma.

! SCSDB students have to acquire the 24 educational credits and pass the exit exam, although students can take the exit exam multiple times. SCSDB does not offer all the required high school courses on campus because of the small number of students and the lack of properly certified teachers (see p. 18). Therefore, SCSDB students must take at least some academic courses in the Spartanburg public schools in order to graduate

with a diploma. However, only 32 SCSDB students were mainstreamed in the public school for part of the day.

The mission of the school is to help its students achieve their greatest potential for independence. In view of this, it is appropriate to look at other outcome statistics in addition to graduation rates. SCSDB tracks student achievements for two years after graduation through a student follow-up survey. Table 2.2 shows survey results. Over the three-year period, 70% of students were either employed, in post-secondary education, or attending a sheltered workshop.

Table 2.2: Post-Graduation Outcomes for SCSDB Students

	CLASS OF 2000 (22 GRADUATES)	CLASS OF 2001 (28 GRADUATES)	CLASS OF 2002 (30 GRADUATES)
Attending College or SCSDB Adult Program	8 (36%)	11 (39%)	10 (33%)
Employed Competitively	5 (23%)	6 (21%)	1 (3%)
Attending Sheltered Workshop	5 (23%)	5 (18%)	*5 (17%)
Homemaker	1 (5%)	0	1 (3%)
Unemployed, At Home	2 (9%)	4 (14%)	**9 (30%)
Moved/Unable to Contact	1 (5%)	2 (7%)	4 (13%)

* Includes one graduate attending adult day care.
** Includes 5 graduates awaiting placement by the Dept. of Disabilities and Special Needs.

Source: SCSDB.

SCSDB students who leave the school without a high school diploma may face formidable barriers to achieving independence and finding employment. But for many students, given the extent of their disabilities and the current academic requirements for a high school diploma, achieving this milestone may be beyond their capabilities. This makes the role that SCSDB plays in transitioning students from school to work even more critical. In recognition of this, SCSDB has initiated a new curriculum for an "occupational" diploma which will help students graduate ready for employment. Transition planning and the occupational diploma are discussed further on page 9.

SCSDB should continue to focus its efforts and resources on helping students who have academic potential to achieve a high school diploma. It was not within the scope of our review to find ways that the school could improve the literacy and math skills of its students. However, given the amount of resources the school has per student (see p. 4), SCSDB must demonstrate to parents, students, and taxpayers that it is doing everything possible to ensure that capable students graduate with diplomas.

SCSDB School Report Card Results

For the 2001-2002 school year, SCSDB received an "excellent" on its school report card, the highest rating possible. According to the S.C. Education Oversight Committee manual for the report cards, two of the main criteria for the school's rating were the percent of IEP objectives mastered and the percentage of academic gains made by students over the previous year. We reviewed the sources of data used by SCSDB to report these gains.

We reviewed students' individualized education programs (IEPs) (see p. 6) and specifically focused on the goals and objectives. The IEPs create a set of goals for each student based on that student's specific academic weakness as determined by a standardized test.

We noted in our IEP review that the goals and objectives were specific and individualized. Students in the blind and deaf schools had goals that were primarily academic in nature and concerned with improving language arts and math skills. Students in the multi-handicapped school had multiple goals addressing their needs in areas such as independent living skills, vocational skills, basic math and communication, and physical, occupational, and speech therapy.

For the 2001-2002 school report card, SCSDB reported that 80.1% of the students' IEP objectives had been mastered. SCSDB uses a computer program to track all the goals and objectives and the quarterly progress reports. SCSDB staff told us that, if a student is not progressing satisfactorily in meeting the IEP goals, an IEP review meeting is held and the goal is changed. We noted that this happened only a few times in our review of the IEP files.

The other measure used by the school was the academic gains made by students in language arts and math, as measured by a standardized test. The report card shows that, overall, 88.8% of the students made gains in language arts and/or math. However, the extent of these gains is not specified. For example, how many students may have improved a whole grade level in reading is not reported. According to SCSDB staff, *any* gain is counted for reporting purposes.

Admittance and Termination Criteria

We reviewed the school's admittance and termination criteria to determine what role the school plays in the continuum of options for children needing special education and whether it complied with state and federal requirements. Prospective students must apply for admission to SCSDB. Students may apply either through direct application by parents or on referral from the local school district. Applicants must meet the school's basic eligibility requirements which are established by the SCSDB Board of Commissioners:

! Parent(s) or legal guardian(s) must live in South Carolina.
! The student must have an educationally significant hearing or vision loss as their primary disability and be 22 through 21 years old.
! Students applying to the School for the Multi-Handicapped must have a least one disabling condition in addition to a hearing or vision loss.
! The student does not pose a threat of harm to self or to others.
! The student must have the emotional and behavioral ability to benefit from the programs offered.

In addition to the basic eligibility requirements, each school has its own additional admissions policies. If the student meets the basic requirements for admission to the school, an eligibility meeting is held to determine whether the child will be placed at SCSDB.

By state law, local school districts are required to serve all children who live in the school district; however, SCSDB has some discretion over which students it will admit to the school. Based on the authority set by the Board of Commissioners, if the SCSDB admission team feels that the school is not the most appropriate placement for the student, it can deny the applicant.

Examples of reasons why a child would be denied entrance into the school include:

! The child could function in an regular school environment.
! The child is determined to be mentally disabled to the extent that he or she could not demonstrate a potential for progress.
! The child with severe behavioral or emotional problems is determined by a psychiatrist, in conjunction with the admissions team, to need a "high management" placement.

The Individuals with Disabilities Education Act requires that children be educated in the "least restrictive environment" possible. The Individuals with Disabilities Education Act (IDEA) does not require that every disabled student be educated in the regular setting; but it does presume that the first

placement option considered for each disabled student is the school the child would attend if not disabled. However, the IDEA also places great emphasis on parental choice. Therefore, parents can decide to send their children to the school without school district involvement. According to SCSDB staff, many parents seek to enroll their children in the school after they have tried the public school system and have found that their child needs more support services.

We reviewed school applications for the period of June 1, 2001 B May 31, 2002. During that time, there were 77 applications to SCSDB. Of those 77, 53 were found to be eligible for admission. Fifty of those eligible enrolled in the school. Seven applicants were found to be ineligible; six of these were in the school for the multi-handicapped. Five applicants were turned down due to a mental functioning range below the trainable mentally-disabled level. One applicant who applied to the school for the multi-handicapped and one applicant to the school for the deaf were found to be ineligible due to emotional/behavioral problems.

Pioneer Ridge Program

SCSDB has not always turned down applicants who have emotional or behavioral problems but has recently changed its admissions policy. The Pioneer Ridge program was created for deaf middle school and high school students whose behavior restricted them from learning in the regular special education classroom. Students in the program were taught in a different location on campus and received separate behavioral supports such as counseling. Two years ago, when the school terminated the Pioneer Ridge program, the Board elected to change the admissions criteria to exclude those deemed "high management." According to SCSDB staff, the students in the Pioneer Ridge program were becoming a threat to other students on campus; therefore, the program was disbanded.

To ensure that the school followed state regulations, we reviewed the procedures used by SCSDB for closing the Pioneer Ridge program and placing the students who had been in the program. We reviewed documentation concerning the placement meetings for each of the students. Of the ten students who were enrolled in Pioneer Ridge at the time of closing, three students were sent back to their local school districts. We found that these students had multiple meetings to determine the correct placement, and that all appropriate participants were invited to the meetings. However, there was insufficient documentation to show whether representatives of the local school districts actually came to the placement meetings. Also, for the three students who were sent back to their local school districts, we determined that the local school districts were not always

invited to the placement meetings at least 7 days prior to the meeting date, as required.

Seven of the former Pioneer Ridge students were accepted back into the regular program at the deaf high school. Because these children needed extra supervision and counseling in order come back into the regular classroom at SCSDB, the school has initiated a comprehensive behavior program for students who need more than the normal supports (see p. 10).

Recommendation

4. The South Carolina School for the Deaf and Blind should ensure that local school districts receive sufficient notification when a change of placement for a student in being considered.

Teacher Vacancies

We interviewed principals and staff of the various schools to determine how teacher vacancies are handled. Primarily, each of the schools has a short list of retired teachers or volunteers on whom they call in case of long-term teacher vacancies. If a teacher is absent for a short period of time, normally the teacher assistants cover the classes.

In addition to other vacancies, we found that the deaf high school has had two math teacher vacancies (one for the occupational track and one for the academic track) for the entire 2002-2003 school year. In that math is a required subject for graduation, this could hinder the students from obtaining the credits they need to finish high school.

The deaf elementary school has had a vacant fourth-grade teacher position for almost the entire school year, and the multi-handicapped school has had several vacancies, with one being vacated during the school year in January 2003.

The school has advertised for these positions on the state website as well as through other methods; however, recruitment for teachers with special skill requirements, such as proficiency in American Sign Language (ASL) or Braille, is difficult.

Other Audits

The S.C. School for the Deaf and the Blind is an independent state agency and does not function as a local school district. For example, the SCSDB board is appointed by the Governor; school district boards are elected. The SCSDB Board has the authority to set polices and supervise the school; however, it meets less than six times a year and is not involved in day-to-day operations. SCSDB is also subject to some oversight by the State Department of Education. We reviewed how oversight of key school functions is accomplished.

South Carolina Department of Education IDEA Compliance Review

The South Carolina Department of Education, office of exceptional children (OEC), ensures district compliance with the IDEA by monitoring schools throughout the state who serve children with disabilities. SDE requires that each school document how it complies with the IDEA and monitors this through on-site visits every four years. During the compliance review, teachers, parents, and students are interviewed and the student files are reviewed. For its most recent review of SCSDB, the office of exceptional children reviewed fifteen files, allowing the school to select five of those files. The office of exceptional children then publishes a report within 30 days after the review. We obtained the most recent compliance review by the office of exceptional children, completed in January 2003, and found that their report had no significant findings.

South Carolina Department of Education Teacher Certifications Review

SDE conducts a review of certification records for teachers, principals, and other educational staff annually as part of the school accreditation process. Accreditation standards require the school to report on whether:

! The principal is full-time, is certified, and has completed a professional development plan.
! All teachers are properly certified for the positions held.
! The percentage of instruction taught by teachers not properly certified does not exceed 10%.
! Permits are requested for all personnel not properly certified.

For the 2002-2003 school year, SDE gave SCSDB the accreditation classification of "all clear," meaning that those requiring certification had the proper credentials.

SCSDB Internal Audits

Another source of compliance monitoring for SCSDB is the school's internal auditor. The internal auditor at SCSDB primarily conducts compliance reviews dealing with state and federal regulations and policies and procedures of SCSDB. Annually, the administrative team decides which areas will be audited. After each audit is completed, a report is generated with general findings and any recommendations. The internal auditor has the authority to make these recommendations and the responsibility to see that they are implemented. If problems are found, the school or department must create a corrective action plan to correct any problems and then submit the plan back to the internal auditor for review. Currently, the internal auditor does not report directly to the board of commissioners; the reports go to the president and vice president of SCSDB.

We reviewed a selection of quality assurance reviews conducted by SCSDB's internal auditor during the 2001-2002 school year. Several of those audits included the student individualized education programs (IEPs).The internal auditor noted the following deficiencies: inadequate letters of invitation to parents; information being vague or left blank in various sections of the IEP; information about participation in statewide testing was blank, inconsistent, or did not reconcile; and record management needed improvement.

Each division of the school then completed a corrective action plan to address the areas needing improvement. We reviewed these corrective action plans and found that the plans provided by each school addressed the areas that the internal auditor reviewed. However, we cannot determine if these action plans have been effective because the school was to implement the new IEP procedures for the 2003-2004 school year.

Recommendation

5. To emphasize the value of the internal audit function and enhance its independence, the internal auditor should also report directly to the S.C. School for the Deaf and the Blind Board of Commissioners.

Safety and Student Advocacy Issues

A main objective of this audit was to review student safety and health (student advocacy) issues at the school. In 1999, a parent of a child in the multi-handicapped school alleged, in part, that the school was failing to provide a safe facility for its students, and filed a complaint against S.C. School for the Deaf and the Blind (SCSDB) with the federal Department of Health and Human Services Office for Civil Rights (OCR). The Office for Civil Rights requested the school to address all the issues raised in the complaint. These issues included:

!　Establishing a new safety committee.
!　Developing safety regulations and buying safety equipment.
!　Conducting safety training in regards to wheelchairs and evacuations.
!　Reorganizing the security program and school resource officer duties.
!　Isolating sick children and notifying parents of health issues.

The school complied, and a settlement agreement and release was signed in May 2002 between SCSDB and the Office for Civil Rights. Until May 2004, the school must submit monitoring reports every 45 days to the Office for Civil Rights. These reports must contain information and updates on what SCSDB has agreed to do to settle the complaint. We reviewed the safety issues raised both by the audit requester and the OCR complaint, and how the school has addressed these issues and ensures that students are personally safe.

Student Advocacy

According to agency policy, employees are "... required to report any known or suspected instances of abuse and/or neglect of school students." In addition, the policy states that "... SCSDB employees supervising students are responsible for reporting all accidents/injuries incurred by students by completing the Student Accident/Injury First Report form." All student accident/injury forms are to be forwarded to the family support specialist, whose duties include obtaining these forms, conducting internal investigations, and notifying other authorities, such as law enforcement or the Department of Social Services (DSS), as necessary. If a student is injured or becomes ill, the supervising employee is required to take the child to the campus health center for medical treatment. The form contains a section for the nurse or doctor to indicate what treatment the student received. The form also indicates if the student's parent or guardian was notified.

During the 2002-2003 school year, SCSDB began a central tracking of student advocacy statistics as a part of its risk management program. As of February 28, 2003, almost 400 accident/injury reports had been recorded for the school year.

From FY 00-01 through February 2003, the school reported the following types of incidents involving students:

! 51 parent/student reports, where SCSDB reported possible abuse/neglect by a parent in the child's home to DSS.
! 20 staff/student reports, where SCSDB staff was involved in a student accident/injury.
! 16 student/student reports, which involved a student injuring another student.
! 10 referrals to SCSDB law enforcement.

We reviewed a non-statistical sample of student advocacy files including:

! 43 student accident/injury reports.
! 6 internal investigation files.
! 4 investigation files involving a staff person and a student.
! 8 files where the case was referred to the Department of Social Services.

The cases we reviewed were handled properly and documented according to policy.

The family support specialist maintains files on incidents which are referred to the Department of Social Services and uses a DSS contact report form. We contacted the Spartanburg County Department of Social Services and the out-of-home abuse and neglect unit of DSS, which would handle incidents of abuse or neglect occurring on the SCSDB campus. Officials with both of these offices stated that the school had been helpful with any investigations which were necessary.

Code of Conduct

The school has a code of conduct handbook for elementary, middle, and high school students, with the exception of many in the multi-handicapped school. These handbooks give examples of unacceptable behaviors and the recommended disciplinary consequences of each. The behaviors are also divided into four levels, depending on the severity of the offense. Each year, the student's parent or guardian is asked to sign a form stating that he/she understands the school's requirements. Statistics for FY 01-02 show that 29% of the students had at least one violation of the code of conduct.

Residential Staff Training

Approximately 68% of the students attending SCSDB are residential students. For much of these students' time, the residential staff (advisors) are responsible for their safety and well being. We checked the advisors' training records and made unannounced visits to three dorms (one in each school) to verify that the advisors were conducting the required bed checks during the night. We found that not all of the residential advisors in our sample had the required training; however, we found documentation of bed checks and information on students' activities in each dorm.

The residential staff has to obtain training on topics including:

! CPR and First Aid.
! Behavior de-escalation training (MANDT).
! Positive Behavior Systems (PBS).
! Student Safety and Health (Advocacy) Issues.
! Disease Prevention\Blood-Borne Pathogens\Exposure Control Plan.
! Disaster Plan.

We reviewed a sample of residential advisor personnel and training files to determine if this staff was properly trained. Only 5 of 12 residential advisors in our sample had all of the required training. For example, we found that 7 residential advisors did not have current certifications in CPR and/or first aid. According to the director of residential life, mandatory training must be completed within the first year of employment. Since many of the residential students have complex medical issues, however, the best approach would be for staff to obtain all required training before working with the students.

The school does not have a coordinated tracking system for the training records, and it was difficult to ascertain which residential advisors had completed what training. Training records were found in both the human resources office as well as the office of residential life.

To ensure that staff receives the proper training in a timely manner, there should be one division responsible for scheduling and documenting training. Normally, this function is handled by the human resources office. If this function were under one office, that office would be held accountable for scheduling training and ensuring that staff complete all training and renew certifications as required.

Recommendations

6. The S.C. School for the Deaf and the Blind should implement a central system for scheduling and documenting training within the human resources division.

7. SCSDB should ensure that all staff who are required to have training receive this training before working with the students.

Fire and Safety Hazards

The school has made progress in recent years in addressing safety issues on campus. The safety division was placed under the office of human resources in the spring of 2002. Since that time, several measures have been implemented or enhanced, including:

! Safety committee meetings held regularly.
! Crisis management draft plan updated (formerly emergency preparedness plan).
! Mobile text-page telephone system campus-wide.
! Employee I.D. badges now include emergency codes on the back of each badge.

We reviewed minutes of the safety committee meetings from September 2002 through April 2003 and found that its membership includes representatives from the human resources office, the various schools (blind, deaf, multi-handicapped, career and technology), facilities management, residential life, security, transportation, and the school improvement council (parents). These members report on issues such as:

! Inspections, fire alarms, and fire drills.
! Staff and student training.
! Accident/injury reports (of students).
! Employee injuries.
! Law enforcement activities (investigations, arrests, searches, etc.).

In addition to interviewing staff of SCSDB, we also contacted the county emergency preparedness office, the local fire department, and the state fire marshal to obtain information about safety-related issues.

Emergency Preparedness
There was an allegation that the school did not have an emergency preparedness plan on file with the Spartanburg County Emergency Preparedness office. We contacted that office and found that the school did have a plan on file since 1995, but it did not address many of the issues

considered important by the emergency preparedness staff. These issues have been addressed with the crisis management plan which the school drafted in the fall of 2002.

Fire Department

The school has a good working relationship with Croft Fire Department, which is located across the street from the campus. The fire chief serves in an advisory capacity on the school's safety committee. On occasion, the fire department has conducted staff training and voluntary walk-throughs of buildings.

State Fire Marshal

The most recent inspection of the campus by the State Fire Marshal was in the spring of 2002. While the fire marshal noted deficiencies in buildings housing students, he found no significant non-compliance or life and safety problems.

Public Safety on Campus

The school also established a safety/risk manager position; however, it has been difficult keeping a qualified person in that position. The position has been vacant since November 2002. In addition, there is a full-time public safety director and a school resource officer. The school resource officer is also a deputy sheriff with the Spartanburg County Sheriff's Office who is assigned to the school. These two officers have tried to cover all of the first and second shift hours; however, another officer may be needed to relieve the schedules of these individuals and provide better coverage during the third shift hours. The director of public safety, with the advice of the director of human resources, developed several proposals regarding ways to improve security coverage on campus; however, as of June 2003, security coverage had not changed.

School Buses

We also looked at the safety of the school buses. We found that all buses, except the mini-vans used for the mainstream students, have video cameras and at least one attendant to assist the bus driver. The school maintains video tapes for six months then reuses the tapes. The seven new school buses obtained this year have digital cameras which are more sophisticated than the older cameras and can show the bus from four angles. All bus drivers and attendants must obtain initial training and update that training every year.

Federal Office for Civil Rights (OCR) Complaint and SCSDB Insurance Claims

As noted, SCSDB has initiated various new campus safety and student advocacy procedures in response to the OCR complaint. The school is required to report on these initiatives every 45 days to the Office for Civil Rights in Atlanta. Although the school has been complying with this requirement, an official with the Office for Civil Rights stated in June 2003 that the OCR office has not reviewed these reports. When the reports are received, they are filed. Therefore, the OCR office does not know whether the school has responded adequately and is not monitoring the school's progress on safety issues.

According to the HHS Office for Civil Rights, there have been no other complaints filed against the school. We also contacted the federal Department of Education Office for Civil Rights to determine if it had a record of any complaints filed against SCSDB since 1999. The agency indicated that no complaints were filed against SCSDB.

There has been only one claim, for a small amount, filed against the school that involved the state's Insurance Reserve Fund since January 1999. There were more serious cases filed in previous years, at least three of which involved the supervision or safety of students, for a total overall payout of $654,280.

We reviewed the SCSDB board minutes from 1999 through 2003 to determine whether there were discussions of any complaints and/or lawsuits. We noted that the individual who filed the 1999 OCR complaint had made a presentation to the board; however, there were no other discussions involving complaints or lawsuits.

Capital Improvement Projects

One of the issues raised in the 1999 complaint to the Office for Civil Rights was the condition and safety of the buildings on the SCSDB campus. According to correspondence from the OCR, the complainant alleged that:

> There is more concern regarding the preservation of historical buildings than the lives of children at SCSDB…. Herbert Center (the school for the multi-handicapped) is not accessible and therefore fails to meet requirements of the ADA. Specifically, exits are not accessible, exits are obstructed by debris, trees, and trash….In addition, top windows of the dormitory…cannot be raised, providing no alternative exit or method for escape in the event of a fire.

We reviewed SCSDB's master facilities plan and the on-going capital improvement projects on the campus. The agency currently has four major projects underway. Its largest capital project is the $12 million renovation of Walker Hall, the school's oldest building and "focal point" of the campus. However, the master plan shows that key buildings used or occupied by students have problems meeting safety and Americans with Disabilities Act (ADA) requirements. The school is seeking capital improvement funds to address the facility needs that were pointed out in the OCR complaint and by the master facilities plan.

The master facilities plan was completed in 2000 by a team of architects and engineers who assessed every building on campus. We reviewed the assessments for six buildings used by students for classrooms and dormitories. The master facilities plan found that all of them had areas that were not compliant with ADA, not handicapped accessible, or did not meet life safety requirements. Table 3.1 compiles some of the details from the master facilities plan for these six buildings. The total cost estimate to renovate or replace these buildings is $22,998,490. As of spring 2003, SCSDB had received $1.5 million for one of the buildings.

Table 3.1: Assessments for Student Buildings

BUILDING/ YEAR BUILT	USE	AREAS NOT ADA** COMPLIANT OR HANDICAPPED ACCESSIBLE	BUILDING REPAIR COST ESTIMATE
HERBERT CENTER 1977	Dorms and classrooms for multi-handicapped	Hardware*; exits from classrooms; handrails; exterior components; ramps meet ADA but extreme length could be dangerous	$6,900,000
LIONS DEN INDEPENDENT LIVING HOUSE 1926 - Renovated 1996	Blind students learn independent living skills	Hardware; main entrance; guardrail; generally not handicap accessible	$179,700
MULTI-HANDICAP INDEPENDENT LIVING HOUSE 1988	Learn independent living skills	Hardware; main entrance; ramp; guardrail; generally not accessible	$223,700
MEMMINGER HALL 1972	Deaf High School	Hardware; Handrail; generally not handicap accessible	$2,062,850
ROBERTSON HALL 1966	Blind School	Hardware; outside areas; generally not handicap accessible	$6,074,800 new facility cost
THACKSTON HALL 1956	Deaf Elementary School	Hardware; ramps have no handrails; no accessible bathrooms; no elevator; wheelchair lift not operable	$7,557,440 new facility construction

*   Hardware Ϲ Door knobs and handles
**   ADA Ϲ Americans with Disabilities Act

Source: SCSDB.

The school stated in its FY 03-04 budget request that "…SCSDB's aging facilities do not meet the accessibility standards set by the Americans with Disabilities Act." According to SCSDB staff, these buildings *did* meet existing codes when they were constructed, but new requirements for safety and handicap accessibility have been added since then. It is the architect's responsibility to ensure that buildings meet safety and ADA codes during new construction. The state engineer's office approves new projects and also ensures that they will meet ADA requirements. However, according to SCSDB staff, no external party inspects existing buildings for compliance with building safety and handicap accessibility requirements. (The state fire marshal does perform biennial fire safety inspections on the campus, see p. 25.) Keeping the buildings up to code is the agency's responsibility.

SCSDB has requested funds for each year since FY 99-00 to make facility improvements, and accessibility and safety upgrades are its number one priority for capital funding for FY 02-03 and FY 03-04. The school has four capital projects underway, as shown with estimated completion cost:

! Renovation of Walker Hall ($11,920,000).
! Renovation of Herbert Center ($1 million, phase one).
! Construction of a crosswalk and other improvements to the main entrance ($298,321).
! Construction of a replacement building for the old Hughston Hall ($2,720,900). The old Hughston Hall currently houses the agency's administrative offices. When Walker Hall renovations are completed, the administration will move into that building and old Hughston Hall will be demolished. The new Hughston Hall will have independent living apartments.

The Walker Hall renovations are funded through a state capital improvement bond, and the first floor is expected to be completed by spring of 2004. In addition to administrative offices, Walker Hall will include the student cafeteria, auditorium, museums, exhibit areas, and art, music, and dance studios.

Herbert Center is being renovated in three phases. The goals of the project are to bring the building into ADA compliance, meet current building codes, remove the wheelchair ramps, build a covered porch and walkways, and make interior improvements such as new lighting and painting. SCSDB has $1 million in bond funds and another $500,000 in state appropriations for the first phase. The school requested another $5.9 million for Herbert Center in FY 03-04.

The school has been criticized for its decision to renovate Walker Hall first. According to agency officials, Walker Hall became a priority in November 1998 when water damage caused the ceiling in the building's auditorium to collapse. The third floor of the building also was unusable, and the building lacked handicap accessibility. While SCSDB received $80,000 in emergency funding from the Budget and Control Board to repair the roof, the agency felt that Walker Hall could provide much needed space for school activities if it were fully renovated.

Renovations to Walker Hall were underway before the master facilities plan was completed that showed such extensive needs in other buildings. Now that the school has a master plan, it can prioritize the needs of other buildings and repair those most critical to student health and safety first.

Audit Scope and Methodology

Scope and Methodology

The period of our review was generally from FY 99-00 through FY 02-03. We reviewed the operations of the School for the Deaf and the Blind at its campus in Spartanburg. We concentrated our review on the educational, therapeutic, and residential services for students in grades K-12. We did not review the school's post-secondary program or its outreach program and the six satellite offices located throughout the state.

Our sources of information included:

! The federal regulations concerning the Individuals with Disabilities Education Act (IDEA).
! Laws and regulations of the State Department of Education regarding special education, teacher certification, school report cards, and school certification.
! SCSDB's school report card, accreditation report, and annual accountability report.
! State Department of Education audits of compliance with IDEA.
! SCSDB internal audit reports.
! Monitoring reports submitted by the school to the federal Health and Human Services Office for Civil Rights.
! Financial reports from the S.C. Comptroller General's Office and reports generated by SCSDB's accounting system.
! The school's master facilities plan and permanent improvement project requests.
! Interviews with staff, teachers, and parents from the school as well as with staff from the State Department of Education, the state Insurance Reserve Fund, the S.C. Department of Disabilities and Special Needs, the S.C. Department of Social Services, the local fire department, the county emergency preparedness office, and the HHS Office for Civil Rights.
! SCSDB student advocacy files, public safety director's reports, student records, and personnel, training and staff certification records.
! Fire marshal inspections and safety committee minutes.
! SCSDB board minutes.

We also reviewed a statistically representative sample of student individualized education programs (IEPs) and permanent files. We also sampled other records, such as student advocacy reports and personnel records, on a limited basis. Computer-generated data was not central to the objectives of this report.

This audit was conducted in accordance with generally accepted government auditing standards with the exception of the general standard concerning quality control. Due to LAC budget reductions, funding was not available for

a timely external quality control review. In our opinion, this omission had no effect on the results of the audit.

IEP Review

We conducted a review of student individualized education programs (IEPs) and permanent student files in the multi-handicapped school, the deaf high school, and the blind high school in order to review student goals and school compliance with state and federal requirements. To create the survey instrument, we used sections of the SDE *Monitoring Manual for Determining Compliance under the IDEA 2002-2003*.

To select the sample of students, we used the student count for the last school year (01-02). Sample size was based on a population of 189, with a maximum allowable difference of .05, a confidence of .90 and a population proportion of .50. The population of 189 students for the sample included all students in the deaf high school (15), all students in the blind high school (51), and all students (of all ages) in the multi-handicapped school (123). We concentrated on high school students in order to focus part of our review on transition planning, which is required for students when they turn 16. We randomly selected 112 students to be in the sample (n=112). If any students selected for our sample were no longer attending the school, we went to the top of the current roster for each school and selected the next available name. Because there were not enough students in some schools for the original sample size of 112 to be maintained, the final sample consisted of 105 student IEP and permanent files.

Our review focused on parts of the IEP process that could be documented. We reviewed IEP files to ensure that each IEP was individualized for students, that their goals and objectives were measurable and changing each year, that the curriculum was based on state standards, that the school was reporting the students' performance on a regular basis, and whether the school was working to graduate students with a high school diploma. From student permanent files, we determined how often students were being tested, whether local school districts were invited to eligibility meetings and how contact between teachers and parents was documented.

Cost Per Student

We also determined an average per pupil cost at the school for FY 01-02 (see p. 4). While actual costs vary between the school divisions and between elementary and secondary grades, Table A.1 combines the individual school expenditures. The number of students used is based on the school's average daily membership (ADM) for FY 01-02. The ADM is the figure that the Department of Education uses to count students for funding purposes. The figure is different from the enrollment statistics shown on page 2 because it is the average number of students who were enrolled through the 135th day of school C in other words, the average number of students during the year. (The enrollment numbers on page 2 are higher because they represent the number who were enrolled at any time during the year, which could have been for a few days.) The student count for kindergarten through 12th grade was 307. In some categories we used a higher count of 352 students. This includes adult students who attended the school's post-secondary program in FY 01-02. The instructional costs for these students are included in the student support services category, and they are also allocated a share of administration costs and operations and maintenance costs. In the residential category, we used a lower count of students. Residential services were used by an estimated 233 students.

We revised SCSDB's program categories to be more closely aligned with the way the State Department of Education reports per pupil expenditures on its website. Since SCSDB is a state agency, and also offers a residential program, it does not report its expenditures in the same way a school district does. However, we categorized the expenditures in a similar fashion, although they are not exactly the same.

Although methodologies for determining the cost per student vary, we took several steps to ensure that our methodology would not overstate the cost. For example, we deleted the school's expenditures for its outreach program, including the program's administrative and operations and maintenance costs, from the total costs used for our calculations. We included students who did not represent a proportional share of the costs in some categories. We also did not include SCSDB's expenditures for capital improvements in our cost calculations.

Table A.1: SCSDB Per Residential Pupil Cost for FY 01-02

PROGRAM CATEGORY	EXPENDITURES	PER PUPIL	% OF TOTAL PER PUPIL COST
INSTRUCTION Principals, assistant principal, teachers, teacher assistants, PE, independent living house, educational supplies, other classroom costs	$5,146,431	$16,764	29%
STUDENT SUPPORT All health services - nursing, counseling, physical therapy, occupational therapy, speech & audiology; library, media, and career & technology	$3,540,065	$10,057	18%
RESIDENTIAL Director of residential life, associate directors, 2nd and 3rd shift residential advisors, other residential staff and program operating costs	$2,581,554	$11,080	20%
OPERATIONS AND MAINTENANCE General overhead, utilities, security, data processing, IT, communications, maintenance, grounds, housekeeping, warehouse	$3,084,674	$8,763	15%
ADMINISTRATION President's Office, professional development, public information, human resources, safety coordinator, fiscal management, Medicaid auditor, EAA (report card), capacity building, parent council	$2,258,238	$6,415	11%
BUS AND FOOD SERVICE Bus drivers, aides, and other operating costs for weekend buses; contract for food services	$1,296,725	$4,180	7%
TOTAL (Does not include agency expenditures for outreach services, day student transportation, debt service or permanent improvements.)	$17,907,687	$57,259	100%

Assumes a residential student attending the school in grades K-12.

Agency Comments

SOUTH CAROLINA

SCHOOL FOR THE DEAF AND THE BLIND

Serving Individuals Who Are Deaf, Blind or Sensory Multidisabled

September 10, 2003

Mr. George L. Schroeder
Director
Legislative Audit Council
1331 Elmwood Avenue, Suite 315
Columbia, SC 29201

Dear Mr. Schroeder

Enclosed is our agency's response to the Legislative Audit Council's report on the South Carolina School for the Deaf and the Blind. We are pleased with the report and have already implemented most of the recommendations.

We appreciate the cooperation and support demonstrated by you and your staff. The audit team was committed to compiling a fair and accurate report and demonstrated a sincere desire to understand the specialized needs of individuals with disabilities.

Please express our appreciation to your staff for the professionalism and courtesy they demonstrated throughout the audit process.

Sincerely,

Sheila S. Breitweiser, Ed.D.

A Palmetto Gold School

AGENCY COMMENTS: RESPONSE SUMMARY

Introduction

We are pleased with the results of the review conducted by the South Carolina Legislative Audit Council (LAC). We commend the faculty and staff of the South Carolina School for the Deaf and the Blind (SCSDB) on the excellent results in the areas of safety and educational quality. These areas have been priority goals of the agency's strategic plan and accountability report in recent years. It is rewarding to see that our systematic efforts in these areas have paid off, especially in light of state budget reductions in recent years.

The Legislative Audit Team gave us the valuable perspective of outside observers. They reiterated important questions that have been raised as part of our strategic planning process. The audit process caused us to look even more closely at the quality of our services, the cost for providing them, and the benefits to our students and other clients. After nine months of review and discussion, our strategic planning goals have been reinforced, and we are confident that SCSDB is positioned for continued mission accomplishment.

A Palmetto   Gold School

1-888-447-2732 V/TTY
www.scsdb.k12.sc.us

Strengths

Many strengths were identified through this review process. These strengths are described in detail later in our response document, but we have selected a few to mention here:

1. Excellent rating on the school report card, the highest rating possible
2. High placement of graduates in employment, post-secondary education, and supported employment
3. Significant safety improvements in recent years
4. Lower cost per student than similar schools
5. Reduction in costs to the state even though the complexity of students is increasing
6. Similar enrollment numbers to other state schools for the deaf and the blind
7. Substantial growth in Vision Services to local school districts and Early Intervention Program
8. Campus Master Plan that identifies priority facilities needs

Recommendations

The report included some recommendations for improvement, many of which were general suggestions for additional documentation. Most of the recommendations are already being implemented, some as part of the agency's strategic plan and some as new initiatives.

We were pleased that the audit team agreed with the needed improvements identified by SCSDB through its strategic planning process; these improved facilities and financial management systems (cited below) are priority goals of the agency's strategic plan.

Facilities Needs. As indicated by the report, the agency has developed a Campus Master Plan that prioritizes facility needs. SCSDB has been very creative in identifying a variety of funding sources, even though additional funding is still needed. As funding becomes available, renovation and new construction will address these accessibility and safety needs.

Financial Systems. As this response points out, it was very difficult to agree upon an accounting strategy for identifying true special education student costs, both in the local school districts and at SCSDB. The agency strongly supports the statewide goal of implementing standard accounting software programs in state agencies to ensure accurate and fair comparisons.

We acknowledge that the accounting software currently used at SCSDB is very limited, making it difficult to calculate much of the student cost information. The agency has requested funding to purchase the SAP accounting system, as recommended by the Comptroller General's Office. This system would provide complete reporting capabilities and give the agency the ability to track, maintain, and receive information in diverse formats in a timely manner.

Early Intervention. The report pointed out that the majority of our students do not enroll at SCSDB at an early age. The average age of enrollment is almost 11 years old, after the student has attended a less specialized school for years. Typically, there are significant learning delays when the students finally enroll at SCSDB, necessitating years of "make up" time. As a result, these students' instruction results in significant additional educational costs.

> *"...We can save a lot of money by getting our babies off to the right start."*
>
> *Dr. Baron Holmes, Project Director*
> *South Carolina Kids Count*

Of course, there are many students who are best served by the local school district. We support efforts that focus on identifying students who would benefit most from the more specialized setting at SCSDB. Some students are best served by returning to their hometown schools for their later school years after receiving the adaptive skills needed through SCSDB. It is essential that South Carolina agencies and public schools increase awareness to ensure that special education students are placed in the most beneficial educational setting as early as possible.

SCSDB strongly urges the state to continue its early intervention efforts, beginning with prenatal care and continuing through the important, formative preschool years. Most of the students at SCSDB are disabled from birth, often due to low birthweight, pregnancy (prenatal) complications, and/or prematurity. The South Carolina Kids Count Project reports that:

- Increased costs for SC's low birthweight babies are estimated at $100 million annually.
- The 9.7% of babies with low birthweight account for 54% of newborn hospitalization cost.
- The births of very low birthweight babies (under 3.3 pounds) cost an average of $91,571 each as opposed to a typical cost of $1,933 for healthy newborns.

According to Dr. Baron Holmes, the Kids Count project director, "The additional healthcare, school, and institutionalization costs in subsequent years would likely double this excess cost of low birthweight and prematurity. The Medicaid program, state agencies, and school districts will pay most of these additional costs. We can save ourselves a lot of money by getting our babies off to the right start." Dr. Holmes' statement certainly describes the circumstances of many SCSDB students in terms of excessive cost and complexity.

On-Campus Enrollment and Cost Per Student

As we worked with the review process, we learned that both SCSDB's enrollment and cost per student compare very favorably

with similar schools across the country. A study of nine states with public residential schools for the deaf and the blind, conducted in the 1998-1999 school year, revealed that the current cost per student at SCSDB is $18,650 less than the average of the schools in the other nine states (when adjusted for inflation). In addition, the current enrollment at SCSDB is comparable to the average of the other residential schools for the 1998-1999 school year, even though most of the other schools are located in much larger states.

Average Enrollment and Cost Per Student At Selected Public Residential Schools (adjusted for inflation) Compared to SCSDB		
	On-Campus Enrollment	Cost Per Residential Student
S.C. School for the Deaf and Blind	413	$36,954
Average in Other States	406	*$55,604

Source: 2000 Report by The Mississippi Legislature's Joint Committee on Performance Evaluation and Expenditure Review and the South Carolina School for the Deaf and the Blind 2002-2003 Summary of Services and 2003 Cost Per Student Data. (*when adjusted for inflation)

Reduction in Costs

SCSDB's costs per student have decreased significantly over the last fiscal year.

Our examination verified that SCSDB's costs per student have decreased 15% over the last fiscal year (see chart below).

SCSDB Cost Per Student – All Funding Sources			
2001-2002		2002-2003	
Number of Students	Cost Per Student	Number of Students	Cost Per Student
401	$43,474	413	$36,954

SCSDB has been able to reduce costs, even though the complexity of students has increased significantly over the last decade. Provision of related services (e.g. occupational therapy, physical therapy, speech/language, orientation and mobility) has increased anywhere from 50% to 300% for both numbers of students served and frequency of services.

Reduction in State Funding

Since 1990, state dollars as a percentage of the total SCSDB budget have decreased by 20% to their current level of 58%. The overall reduction in SCSDB's state allocation also means that the agency has reduced its use of state funds for student expenses. Fortunately, the agency's successful efforts to identify alternative funding sources (including grants, partnerships, private contributions, and fees for services) have enabled SCSDB to maintain high quality services. However, SCSDB continues to search for ways to decrease costs, for example, through efforts such as freezing administrative positions, other personnel cost saving measures, implementation of various conservation measures, and (regrettably) deferring maintenance needs.

Difficulty in Making Accurate Comparisons for Student Costs

The report indicates that the cost per student is higher at SCSDB than in local public school districts. However, no standard formula has been developed to determine the true cost of special education students in the public school districts. As a result, the basis for making comparisons varies, making the data presented uncertain.

A similar cost comparison effort in North Carolina caused auditors there to conclude that it was very difficult to compare costs per child between local public schools and the state residential schools. This was because none of the public school districts contacted maintained accounting systems that allowed them to calculate fully and accurately the cost per child for exceptional children in the public schools. We submit that this is also the case in South Carolina.

Another educational issue makes it very difficult to attempt to compare SCSDB to SC public schools. As the report indicates, many of the students at SCSDB attended public school in their home districts before coming to SCSDB and enrolled at SCSDB because they "can't make it" in their home school districts. This information suggests that these students need a much higher and intensive level of service than they were receiving; thus, the costs for moving these students into remedial services would be expected to be correspondingly higher. As is documented in the Kids Count Report, it is logical that children who are born with complications at a higher cost will require higher education costs.

Variation in Costs

The reader will note that the audit team determined the cost per student to be higher than indicated in the charts in this response document. This is due primarily to the lack of an agreed upon formula for calculating the cost of special education students.

As indicated in Appendix A of the report, the audit team utilized their own method for determining cost per student. SCSDB's Certified Public Accountant and Chief Financial Officer supported a different methodology. Since that time, the SCSDB Finance Office staff has consulted with the current and former SC State Auditor and various residential schools to determine how to separate outreach program costs from on-campus student costs at SCSDB. The methods used to derive indirect cost allocations of the programs at SCSDB are consistent with standard accounting practices and methods used by the current and former SC State Auditor, various peer institutions in other states, and the Duke Endowment Cost Report on Child Care Statistics in South Carolina Children's Homes.

In addition, the audit team used the Average Daily Membership (ADM), the average number of students present through the 135th day of instruction, rather than the total enrollment for the year. Use of the ADM formula does not allocate costs expended in serving all of the students who were enrolled during the full school year, which we believe is essential in determining the true student costs.

No standard formula has been developed to determine the true cost of special education students in the public school districts.

Use of the Average Daily Membership (ADM) formula does not allocate costs expended in serving all of the students who were enrolled during the full school year.

Educational Strengths

We appreciate the recognition by the Audit Team of SCSDB's educational strengths to include:

1. An "excellent" rating on its school report card, the highest rating possible
2. Strong performance on SC Department of Education IDEA Compliance Review and the SC Department of Education Teacher Certifications Review
3. High placement of students in employment, post-secondary education, and supported employment
4. An Occupational Diploma Program that readies students for competitive employment
5. Development of a full-time GED program
6. Improved transition processes that assist students in moving from school to work
7. Parent participation in Individualized Education Program (IEP) and other academic meetings
8. IEP goals that address student weaknesses as identified in assessments
9. All IEP goals in the School for the Multihandicapped geared toward readying students for transition from the school back to their home communities

Variation in Enrollment Data

The report indicates a decline in on-campus enrollment over a 12-year period. However, the report does not cite the fact that two student programs were discontinued resulting in enrollment reductions. SCSDB discontinued the programs because they were not central to the agency's mission.

Staff Data

The report stated that SCSDB had a total of 412 employees as of January 31, 2003. This included a diverse group of employees ranging from minimal use part-time to full-time employees. These employees were serving in programs throughout the state of South Carolina.

Significant Growth in Outreach

It should be noted that while SCSDB's on-campus enrollment continues to compare favorably with similar schools across the country, SCSDB has also shown substantial growth in outreach services. Over the last 12 years, the agency's Outreach Student Service Programs (Early Intervention and Vision Services in the public schools) have shown a 98% increase.

Awareness Efforts

In the 2002-2003 year, SCSDB showed a 3% enrollment increase over the previous year. This was a direct result of increased communication with special education directors and teachers in SC public school districts. Additional efforts are needed to increase awareness of the services available at SCSDB and to encourage earlier enrollment of students who would be better served in SCSDB's specialized setting. We also fully support SC's efforts in public awareness that encourage improved prenatal care, thereby reducing the incidence of sensory disabilities.

Educational Issues

The audit team found no significant areas of educational non-compliance.

The Legislative Audit Team concluded that SCSDB has generally complied with special education requirements, and the team found no significant areas of non-compliance. It should be noted that, in most cases, the audit team's recommendations were related to access to documentation of records rather than concerns about the quality of educational services.

Behavior Program

We agree with the recommendation that a copy of behavior intervention plans be placed in the student Individual Education Program (IEP) file and that functional behavior assessments be placed in the permanent file. Actually, behavior intervention plans are already filed in the IEP file. Only about 5% of SCSDB students currently require behavior intervention plans. Functional behavior assessments are currently being filed in the behavior specialist's office, but will also be filed in the permanent file as the report recommended.

Repetition of Goals

The report noted that goals for multihandicapped students are often repeated from year to year. However, goals are sometimes repeated across years due to the multiple obstacles students face and the need to learn the skill in a variety of settings. Teachers and staff are implementing several strategies to ensure that an IEP goal repeated from a previous year is still appropriate.

Eligibility Meeting

The audit team did not find documentation that local school districts were invited to all eligibility meetings. SCSDB has notified the LAC that this documentation is located in the student's permanent file. However, in SC, parents do have the right to waive the seven-day notification of the local school district, which has happened with SCSDB parents on occasion. It is our practice to regularly invite local school districts to eligibility meetings, but this is not state or federal law.

Standardized Tests

The report indicated that not all of the eligible students took the high school exit exam. However, the audit team may not have realized that, as part of the IEP meeting, parents and staff discuss and determine which standardized test high school students take. All eligible students were either exempted by the IEP team in the spring of 2002 or took the high school exit exam with accommodations and modifications. In the spring of 2003, all of the eligible students participated in either the high school exit exam or the alternative exit exam.

Assistive Technology Assessments

The audit team was unable to find documentation of assistive technology evaluations in the review of IEPs. Actually, these evaluation reports do exist and are filed in the speech and language therapists' office files or in the related service providers' files for ease of access by the staff members who routinely use these assessments.

Placing technology assessment information in the IEP file is not an efficient practice because accessing them in that location would increase staff time without any benefit. However, we do agree that it would be helpful to place technology assessment information in the permanent file under "assessment and evaluation."

SCSDB commits to strengthening its assistive technology training program because we strongly believe in its importance for our students. It should be noted that access to specific skills training through assistive technology is cited as a major reason for choosing SCSDB indicated by 75% of parents surveyed through the school's admissions process.

Recommendation 2:
The School for the Deaf and the Blind should continue its plans to improve transition goals and services for students to ensure it provides for students' individual needs and helps students to live as independently as possible.

SCSDB Response:
We agree with the importance of this. In fact, a transition task force has already been convened and meets monthly to revise transition processes and procedures, seek off-campus employment, note trends in industry, and strive for partnership development.

Recommendation 3:
The School for the Deaf and the Blind should place a copy of behavior intervention plans into the student IEP file and place functional behavior assessments in the permanent file.

SCSDB Response:
We agree with this recommendation and will implement it.

Recommendation 4:
The South Carolina School for the Deaf and the Blind should ensure that local school districts receive sufficient notification when a change of placement for a student is being considered.

SCSDB Response:
SCSDB agrees and is already meeting notification requirements.

Recommendation 5:
To emphasize the value of the internal audit function and enhance its independence, the internal auditor should also report directly to the SCSDB Board of Commissioners.

SCSDB Response:
SCSDB agrees and the quality assurance manager reports quality assurance activity directly to the SCSDB Board of Commissioners on a regular basis.

The importance of early intervention cannot be overstated.

Transition Services

SCSDB places 70% of its students within a year of graduation, which is much better than the 58.6% national and state average for special education populations. We agree that SCSDB should continue to improve on our quality transition goals and services, enabling students to live as independently as possible. A transition task force has already been convened and meets monthly to revise transition processes and procedures, seek off-campus employment, note trends in industry, and strive for partnership development.

Educational Outcomes

A full 98% of the SCSDB students who have the academic potential to graduate with a high school diploma do so. However, as noted by the report, there are multiple reasons that some SCSDB students may not have the academic skills for a high school diploma. In these cases, an occupational diploma or certificate of attendance may be a more appropriate goal.

The average student at SCSDB is significantly more challenged than other students in the state. It should also be noted that the average student entering SCSDB:

1. Is almost 11 years old
2. Has failed a grade or two in the public schools before enrolling in SCSDB
3. Needs intensive tutoring and remediation
4. Has self-esteem issues
5. Needs professional assessment to determine needed assistive devices (i.e. hearing aids, Braille accessories, software, and communication devices)
6. Is likely to have more than one disability (79% of SCSDB students have multiple disabilities)
7. May come from a high poverty family situation (85% of SCSDB students are eligible for Medicaid and free/reduced lunches)

It is often disheartening to learn that the goal of a high school diploma cannot be met by every student. However, SCSDB strives to attain as much success as possible given the individual student's circumstances. In addition to the attainment of a high school or occupational diploma, we also define the successful student as a gainfully employed, contributing citizen. We strive to ensure that each SCSDB graduate reaches his or her maximum individual potential.

The importance of early intervention and good prenatal care cannot be overstated in the education of special needs children. SCSDB is seeking to expand its Early Intervention Program and to encourage admission to the school during the important, formative early years.

Admittance and Termination Criteria

The statement that five students were refused admission to SCSDB due to a mental functioning range below the "trainable mentally-

disabled level" should have been stated in the current terms of measurement. The SC Criteria for Entry into Programs of Special Education for Students with Disabilities, R 43.243.1 (released 2001) has amended the ranges to comply with weightings given by the SC Education Finance Act. It should be worded "below the moderate range of mental disability." Admission is based on multiple criteria that focus on the potential for learning with intervention through more specialized services.

SCSDB Internal Audits

The report recommended that the internal audit function should report directly to the SCSDB Board of Commissioners. SCSDB agrees with that recommendation and, in fact, already maintains an internal Quality Assurance Policy with accompanying procedures that includes direct reports to the SCSDB Board of Commissioners on a regular basis (as follows):

1. A written summary of all quality assurance activity including area(s) audited, audit findings, and corrective action required (as appropriate).
2. A comprehensive quality assurance report on at least an annual basis, including all individual audit areas, specific audit purposes, audit findings, corrective action identified, corrective action met, and the proposed audit review schedule for the upcoming fiscal year.

Safety and Student Advocacy Issues

The report identified the following strong points in SCSDB's Safety and Student Advocacy Program:

1. A new crisis management plan that addresses issues considered important by the Spartanburg County Emergency Preparedness staff
2. Safety and student advocacy cases that are handled and documented properly
3. Regularly held Safety Committee meetings
4. A mobile text-page telephone system for emergency communication that has been implemented campus-wide
5. Employee identification badges with emergency codes on the back of each badge
6. Measures to increase bus safety
7. Documentation of dormitory bed checks and information on students' activities
8. A good working relationship with the Croft Fire Department including the department's participation on the Safety Committee, in training, and building inspections
9. A positive report from the State Fire Marshall in the spring of 2002, indicating no significant non-compliance or life safety problems
10. A mutually supportive relationship with the Department of Social Services
11. No significant claims filed against the agency in four years through the Insurance Reserve Fund
12. A Campus Master Plan that will enable the agency to prioritize future needs most critical to student health and safety and ADA compliance.

Residential Staff Training

We agree with the audit team's recommendation that the Human Resources Division should be the centralized office for scheduling and documenting training, and we are working with the individual departments on coordinating their staff training efforts with the Human Resources Division.

We also agree that it would be best for staff to have training **before** working with the students. SCSDB has requested training funding for the past four years and has included the training request in our 2004-05 proposed budget in order to fund training, including pre-service training.

Insurance Claims

Only one small Insurance Reserve Fund (IRF) claim has been filed related to SCSDB since 1999. Prior to 1999, claims over a nine-year period totaled $654,280.

Capital Improvement Projects

As noted in the report, SCSDB currently has four major renovation projects underway: renovation of the Herbert Center (School for the Multihandicapped), new dormitory construction, maintenance improvements, and Walker Hall, the school's oldest building. The school has identified a variety of funding sources to make these improvements possible.

The decision to renovate Walker Hall first was made because this 145-year-old building was no longer safe for occupation. Safety concerns had caused the third floor to be closed for more than a decade, the auditorium was closed after ceiling plaster fell into student seating areas, and other emergency safety repairs had been identified. In addition, Walker Hall did not meet Americans with Disabilities Act (ADA) requirements. Students who use wheelchairs and other assistive walking devices were unable to reach the second floor auditorium or to use the building's inaccessible restrooms. The renovated building will meet ADA requirements.

Areas of the renovated Walker Hall dedicated to student use will include the student cafeteria, auditorium, museum, exhibit areas, admissions offices, and art, music and dance studios. It will also house the school's alumni and volunteer offices.

The Campus Master Plan, completed after the Walker Hall renovation began, will enable SCSDB to prioritize and continue its renovation efforts campus wide, with safety and accessibility being the top priorities. The agency has requested funding for capital projects for the last three years.

Safety Inspections

The report indicated that no external party regularly inspects existing buildings for compliance with safety and handicapped

accessibility. Annual safety inspections are conducted by the SC Health Alliance Risk Assessment. In addition, all buildings have been inspected as part of the development of the Campus Master Plan.

Conclusion

This report will be a source of encouragement and guidance for SCSDB stakeholders. The report indicates that the agency is performing very well in the areas of safety and educational quality. It also shows that we are making continued progress in facilities improvement, staff training, and placement of graduates (even during the state's current economy).

While many strengths were identified through the review process, we are, of course, concerned with the high cost of educating children who are deaf, blind, or sensory multidisabled. We are equally concerned with the underlying causes for much of the cost -- inadequate prenatal care, premature or low birthweight babies, and delayed intervention.

Even though educational costs in South Carolina are lower than in many states, preventive measures could further reduce the cost, ensure healthier lifestyles, and increase opportunities for our state's children. Many students attending SCSDB were premature or low birthweight babies, and their disabilities were present at birth.

South Carolina ranks among the worst in the nation for low birthweight babies (47th), and the state's low birthweight rate continues to increase (8.7% to 9.7% over the last decade). In addition, South Carolina ranks high for premature births, and births to mothers who received late or no prenatal care.

We consider SCSDB to be part of South Carolina's team, working to ensure that our state's children get off to the right start. Opportunities for disabled children increase significantly with early educational intervention. We fully support additional funding for statewide educational efforts to prevent premature and low birthweight births and to encourage good prenatal care because we believe these efforts will result in healthier babies and children and significant cost savings for healthcare and education programs, like SCSDB.

This report will be a source of encouragement.