



## State of South Carolina Office of the Inspector General

January 5, 2018

OIG File #2017-2525-I

Elliot Smalley, District Superintendent  
South Carolina Public Charter School District  
3710 Landmark Drive, Suite 201  
Columbia, SC 29204

Re: Independent Review of Attendance and Truancy Recordkeeping at Four Public Charter Schools

Dear Mr. Smalley:

The purpose of this letter is to provide the results of the South Carolina Office of the State Inspector General's (SIG) review of the four schools identified by the South Carolina Public Charter School District (SCPCSD) as having attendance reporting issues. Reporting the results in a management letter format is designed to avoid the intimidation of a formal report. Hopefully, this will facilitate the review's data to be broadly disseminated to internal and external stakeholders, who have differing levels of familiarity and technical expertise, in order to establish a common frame of reference upon which to stimulate positive change.

### Purpose and Scope of Review

The purpose of this review was to conduct a review of four public charter schools' processes for entering student attendance data into the PowerSchool Student Information System (PS), verify the accuracy of enrollment and attendance data related to student participation records, evaluate each school's compliance with state and federal reporting requirements, and make recommendations for improvements of these processes to SCPCSD and the schools reviewed.

Specifically, the SIG was contacted by the SCPCSD in October 2017, following the SCPCSD's preliminary review of attendance data for the 2016-17 school year of ten public charter schools currently in breach status of their respective charters. This preliminary review included the analysis of attendance data recorded in PS related to student participation and school reporting requirements. As a result, attendance data irregularities were identified when compared to SCPCSD-wide norms, to include evaluation of historical data related to perfect attendance, which required additional review for four public charter schools: Cyber Academy of SC; Midlands STEM Institute; Odyssey Online Learning; and SC Virtual Charter School.

The SCPCSD requested the SIG to further examine the issue as a third-party consultant and conduct a review of these four schools' processes for entering attendance data; and to address two specific issues: (1) all students who were coded in PS as "graduated" and re-enrolled; and (2) students in violation of the ten consecutive absences rule, but were continued to be counted in attendance.

## Executive Summary

The SIG conducted the following assessments for the four public charter schools to determine whether each school's attendance and truancy policies and practices were in compliance with mandated statutory requirements (state and federal), the SCPCSD requirements, and best business practices.

- Three charter schools' attendance and truancy policies and practices complied with state laws and regulations. One school was not in compliance, but revised its policies and procedures during the course of the review to bring it in compliance with state laws and regulations.
- Three charter schools' attendance records for 148 students indicated non-compliance with state laws and regulations in regards to students that remained on the attendance rolls in violation of the ten consecutive absences rule and absences exceeding ten days. Documentation was provided by the charter schools to reconcile the majority of the student absences which were coded in PS in error, for which 49 of the 148 (33%) were out of compliance with state laws and regulations. However, these 49 students reflected less than 1% of the total students enrolled for 2016-17.

Schools Reviewed	Grades	Total Students (135 Day ADM)	Absences Recorded in PS - Consecutive absences>10 or unlawful absences>10	Actual Unlawful Consecutive Absences>10	% of Actual Absences /Recorded in PS	Actual Absences/ % of Total Students
Midlands STEM Institute	K-8	170	34	2	6%	<1%
Cyber Academy of SC	K-12	1,095	17	16	94%	<1%
Odyssey Online Learning	9-12	412	0*	0*	0%	0%
SC Virtual Charter School	K-12	3,508	97	31	32%	<1%
Total Students Impacted		5,185	148	49	33%	<1%

*\*Of the 412 students Odyssey had enrolled for 2016-17, no absences were recorded in PS. The PS records did not reflect actual students' attendance for all of 2016-17. A review conducted by Management at the beginning of 2017-18 indicated the former PS administrator failed to ensure records were properly recorded and maintained in PS while indicating these tasks were being conducted and coordinated with SCPCSD.*

- Two charter schools' records in PS indicated students were coded as graduated, and then were re-enrolled in the school. In both scenarios, the students were erroneously coded in PS, and the coding errors were corrected in PS by the SCPCSD.
  - For one school two students were denoted in PS as graduated, and re-enrolled. Both students were in the Special Education program, which allowed the student to remain enrolled until the age of 21 pursuant to State Board of Education Regulation 43-243. One student was on the non-diploma track scheduled to graduate, but the parents requested the student to be retained. The other student encountered extenuating family related circumstances and wasn't able to complete the units needed to graduate in time.
  - For the other school, three of the 21 students were retained in the 12<sup>th</sup> grade and re-enrolled; five students were transferred to Adult Education/GED; and one student exceeded the maximum age for attendance. The remaining 12 students were truant withdrawals and were dropped from the charter school's attendance rolls.

As a result of the SIG's review, each of the schools expressed it has enhanced its monitoring processes of absences and truant students to meet the requirements set forth by the South Carolina Department of Education.

Based on the results of the attendance review, the SIG found no intentional wrong doing on the part of the four public charter schools, but rather circumstances that arose from miscommunication, a need for additional training for the PS administrators, and human error in the recording of student attendance in PS. The more prominent issue the SIG gleaned from this review was the need for regular and consistent communication and reconciliation of PS data between the charter schools and SCPCSD program managers.

## Background

The South Carolina Code of Laws, as amended, Title 59, Chapter 40, and State Board of Education (SBE) Regulations set forth the structure and governance of public charter schools in South Carolina. The South Carolina public charter school program was established in 1996, when the State Charter Schools Act was enacted. All public charter schools in good standing are considered accredited with their sponsor/authorizer, which means that credits earned by students are eligible for transfer to any public school that diplomas are issued by the State of South Carolina comparable to traditional schools, and are considered valid by colleges and universities. The sponsor of a charter school is the charter school's local education agency.

The SCPCSD was created by the General Assembly in 2006 with a mission of being an authorizer of new public charter schools and an authorizer for public charter schools that need to transfer from a local public school district for whatever reason. In addition, the SCPCSD was designed to house state-wide full-time virtual learning. The SCPCSD's mission is to improve student learning and increase learning opportunities in South Carolina through the creation of innovative, high-quality charter schools. For the 2016-17 school year SCPCSD maintained 34 charter schools, five of which were virtual schools.

### Standards to Assess and Review Student Attendance and Truancy Recordkeeping

To determine that the school's policies and practices were developed in compliance with its mandated statutory requirements (state and federal), the SCPCSD's requirements, and best business practices, the SIG conducted the following assessments for the four schools:

- attendance and truancy policies and practices complied with state laws and regulations;
- school's compliance with state laws and regulations for students in violation of the ten consecutive absences rule and absences exceeding ten days; and
- the validity of students indicated as graduated in PS, and then were re-enrolled in the school.

### Statutory Requirements

In accordance with the South Carolina Code of Laws Chapter 40, Section 59-40-50, a charter school must: (2) meet, but may exceed, the same minimum student attendance requirements as are applied to public schools.

#### ***Accounting and Reporting - SBE Regulation 43-172***

According to Section 4, paragraph (1)(c) of the South Carolina Education Finance Act of 1977, each pupil in the state shall be counted in only one of the pupil classifications and must meet all qualifications both general and specific, before the pupil can be classified and claimed in a public school. Specifically, general criteria #6 states:

*“A pupil shall be dropped from membership on the day when the number of unlawful days absent exceeds ten consecutive days or when the pupil leaves school because of transfer, death, expulsion, graduation, legal withdrawal, or for any other reason. Notwithstanding any other provision, students with disabilities who have been expelled and continue to receive educational services pursuant to Regulation 43-279 (Section V, Part D) shall not be dropped from membership.”*

#### ***Special Education, Education of Students with Disabilities - SBE Regulation 43-243***

The purpose of this regulation is to promulgate the state's requirements of educational programs for students with disabilities, as outlined by the Individuals with Disabilities Education Act, 2004 (IDEA).

### ***Student Attendance - SBE Regulation 43-274***

This regulation applies a three-tiered approach to defining the varying levels of truant behavior. Depending on the attendance circumstances, a child can be deemed truant, a habitual truant, or a chronic truant as outlined below.

- A child ages 6 to 17 years meets the definition of a truant when the child has three consecutive unlawful absences or a total of five unlawful absences.
- A “habitual” truant is a child age 12 to 17 years who fails to comply with the intervention plan developed by the school, the child, and the parent(s) or guardian(s) and who accumulates two or more additional unlawful absences.
- A “chronic” truant is a child ages 12 to 17 years who has been through the school intervention process, has reached the level of a “habitual” truant, has been referred to Family Court and placed on an order to attend school, and continues to accumulate unlawful absences.

### ***Procedures and Standards for Review of Charter School Applications - SBE Regulation 43-601***

Section IV, Virtual Charter Schools: Regular instructional opportunities may include, but are not limited to, the opportunities outlined in Section IV(E)(2).

2. Regular instructional opportunities include, but are not limited to, the following:
  - a. meetings with teachers;
  - b. educational field trips and outings;
  - c. virtual field trips that are in real time attended by other charter school students;
  - d. virtual conferencing sessions; and
  - e. offline work or projects assigned by the teacher of record.

### ***PowerSchool Student Information System***

PS is the current student information system provided to school districts by the South Carolina Department of Education and is the main source for student data collections. Student-level data are input, validated and maintained by local school districts. The “source data” are ultimately used to fulfill state and national data reporting mandates. [South Carolina Department of Education PowerSchool 2016-17 Data Collection Manual](#)

The PS system, a web-based student information system from Apple Computers, is available to all district and school staff, including teachers, administrators and IT staff. SCPCSD maintains PS Support on-line training videos of upcoming training webinars, and archived webinars. As indicated by SCPCSD staff “Operator Notes” are sent out every Tuesday, and resources are maintained on the “Bookshelf” for easy reference.

Each charter school has a designated PS administrator that the school is responsible for hiring and managing. The skill level varies among PS administrators in the SCPCSD. While the schools have direct responsibility for day-to-day PS entries and record keeping as autonomous charter schools, SCPCSD maintains a support “ticket system” for schools to submit questions and requests that are sequentially addressed by Student Information Services.

Charter schools, each with their own academic model, can elect to structure PS attendance to record attendance through the Daily and/or Meeting Attendance code. In “Meeting Attendance” a code is recorded for each period; whereas in “Daily Attendance” only one code is utilized for the entire day. For virtual schools, the flexibility of the virtual school model allows students to meet the 36,000 instructional minute requirement in a number of different ways over the course of the year, to include live classes/reading assignments; labs, viewing recorded lessons; meeting with teachers; online conferences; attending resource and small group classes; educational trips; and make-up classes/days/hours on weekends and holidays (outside of the normal Monday through Friday as traditional schools). These other learning avenues are allowed to capture the students recorded 120 hours, per unit of attendance or a proficiency equivalent for awarded Carnegie credits.

## Review Process and Results of the Review

The SIG interviewed each school’s leadership team and current PS administrator responsible for ensuring student daily attendance is posted by the teachers for a traditional school: Midlands STEM; and to assess student attendance/participation reporting for the virtual schools: Odyssey Online Learning; Cyber Academy; and SC Virtual Charter School.

The following exceptions were identified in PS by SCPCSD staff.

Schools Reviewed	Grades	Default coding	Total Students (135 Day ADM) <sup>(1)</sup>	Consecutive absences>10 or unlawful absences>10	Students Graduated/ Re-Enrolled	SIG Reviewed 100%	% of Total Students
Midlands STEM Institute	K-8	Daily	170	34	0	34	20%
Cyber Academy of SC	K-12	Daily	1,095	17	2	19	2%
Odyssey Online Learning	9-12	Daily	412	0*	21	21	5%
SC Virtual Charter School	K-12	Daily	3,508	97	0	97	3%
Total Students Impacted			5,185	148	23	171	3%

<sup>(1)</sup> Average daily membership (ADM) - the aggregate number of days in membership divided by the number of days the school is in session.

\* No absences were documented in PS for the 2016-2017 year.

### Midlands STEM Institute (Midlands)

Midlands’ 2016-17 attendance and truancy policies complied with state laws and regulations. However, the SIG noted that Midlands’ application of its procedures was not in compliance with its truancy policy. Of the 34 students denoted in PS as exceeding ten days of absences, no notation was entered into PS to indicate that the students were truant, although truancy letters were processed for ten of the 34 students, and none of the students had been removed from Midlands’ attendance rolls. Additionally, the truancy letter utilized by Midlands to communicate truancy issues with the parents did not comply with its policy, but instead stipulated that students would be retained, rather than indicating that the student would be dropped from the attendance rolls. After further discussion with Midlands, the truancy letter was revised for the 2017-18 school year to incorporate the language of state law and regulations.

Of the 34 students with ten or more absences recorded in PS, Midlands only had two students that exceeded ten consecutive absences, (73 days and 30 days respectively). A truancy letter was indicated for one of the two students, but neither student was dropped from the attendance rolls in PS on the 11<sup>th</sup> day in accordance with State law. Midlands provided documentation indicating a coding error occurred for one student that subsequently was expelled at the end of the school year, and then later transferred to homebound upon the parents’ request. This, however, was miscoded in PS showing the student as withdrawn on 8/17/17, by the parents. The other student had multiple behavioral and family issues that involved a number of missed days but was retained. Documentation was provided to support both of these transactions in PS.

From further research, Midlands provided an attendance log to document actions taken by the school as denoted in the following synopsis of the 34 students identified in PS with absences exceeding 10 days.

Exceeded ten consecutive absences	2	6%
Absence marked in error (excused*)	18	53%
Student withdrawn (remanded to DSS)	8	23%
Student retained	6	18%
Total Students	34	100%

\*student medical and family issues/illness & deaths should have been excused absences

## SC Virtual Charter School (SCVCS)

SCVCS 2016-17 attendance and truancy policies complied with state laws and regulations. However, the SIG noted that SCVCS' application of its procedures was not in compliance with its policy. There was no indication in PS of any student being reported as truant, and no documentation that parents were notified of truancy issues with those students that PS indicated had consecutive absences that exceeded ten days. Additionally, none of these students were dropped from the school's attendance rolls.

However, as communicated by the SCVCS leadership team, many absences marked were due to human error. Numerous absences that should have been marked as excused for family crisis (student or family member's illness/death/bereavement) were marked in error by former staff. Other students were displaced due to natural disasters such as Hurricane Matthew and fires in Tennessee. Students who were displaced or homeless continued to be enrolled while circumstances were resolved with the family.

Of the 3,508 students enrolled, SCVCS had 97 students (3%) that were identified as having consecutive absences that exceeded ten days. Of these 97, 41 students (42%) were in either kindergarten or the first grade. As indicated by the SCVCS leadership team, 80-90% of kindergarten and the primary grade students' work is conducted offline.

From further research, evidence of attendance documentation was provided in support of the following synopsis of the 97 students identified in PS with consecutive absences exceeding ten days.

Exceeded ten consecutive absences	31	32%
Absence marked in error*	25	26%
Student worked offline (met or mastered K standards*)	22	23%
Transferred to a traditional school outside of the district	10	10%
Student withdrawn (parents)	5	5%
Student moved out of state	4	4%
<b>Total students</b>	<b>97</b>	<b>100%</b>

*\*Evidence of the academic success of the students was provided through notes, certificates of attendance, and year-end report cards.*

## Cyber Academy of South Carolina (Cyber)

Cyber's 2016-17 attendance and truancy policies complied with state laws and regulations. However, the SIG noted that Cyber's application of its procedures was not in compliance with its policy. Cyber has an effective monitoring system that tracks student attendance and activity. Truancy notifications and unlawful absences were entered into PS for each of the 17 students with ten or more consecutive absences, and notification letters of truancy issues were submitted to parents. However, there was a timing gap in processing an "attendance issue withdrawal." Cyber truancy administration team's (FASTeam) understanding of the truancy process was to wait until a status follow-up and verification of any pending instructional hours was performed and adjusted in PS caused a delay in completing the withdrawal of the student from Cyber's attendance rolls. Cyber leadership indicated that instructions to process the withdrawal on the 11<sup>th</sup> day of absence were not effectively communicated and implemented.

From further research, evidence of attendance documentation was provided in support of the following synopsis of the 17 students identified in PS with consecutive absences exceeding ten days.

Exceeded ten consecutive absences (processed late)	12	71%
Exceeded ten consecutive absences (not processed)	4	23%
Student worked offline (attendance not updated in PS)	1	6%
<b>Total Students*</b>	<b>17</b>	<b>100%</b>

*\*SCPCSD staff denoted 15 students in PS that exceeded the 10 day absence rule however, Cyber actually identified 17 students for 2016-17.*

Cyber computed the percentage of error for these 17 students to be less than .03% of a student, and estimated the equated cost to be around \$2,000. Cyber also identified three students in PS for the 2017-18 that exceeded ten consecutive absences and immediately addressed the issue and withdrew these students from the attendance rolls.

Additionally, two students were denoted in PS as graduated, and re-enrolled. Both students were in the Special Education program, which allows the student to remain enrolled until they reach the age of 21 (pursuant to State Board of Education Regulation 43-243). One student was in the 4<sup>th</sup> year as an 11<sup>th</sup> grader on the non-diploma track scheduled to graduate and thus coded in PS. However, the parents requested the student to be retained for a senior year. The other student didn't complete the work in time to provide the units needed to graduate. The student was scheduled to graduate, and the diploma was ordered awaiting the final transcript, but the final transcript indicated a course as pending. Also during this time period the student had several family crisis, along with the sudden loss of a parent. The student attempted to complete make-up work, but was unable to complete 6 credits needed in time to graduate. Cyber provided correspondence with SCPCSD to support that this student was not reported to the state as graduated. The coding error for both students was corrected in PS by SCPCSD.

### **Odyssey Online Learning (Odyssey)**

Odyssey's 2016-17 attendance and truancy policies complied with state laws and regulations. However, of the 412 students enrolled for 2016-17 no absences were recorded in PS, and there were no students indicated as being truant or having consecutive absences that exceeded ten days. The preliminary PS report indicated the school had perfect attendance for the entire student population in 2016-17. Additionally, 21 students were coded in PS as graduated, and re-enrolled.

Interviews conducted of SCPCSD program managers and Odyssey leadership indicated that attendance normally ranged between 89-90%, never perfect attendance (100%).

From further research and communication with the Odyssey leadership team, it was noted the former PS administrator, did not ensure records were properly maintained in PS to reflect actual students' attendance for 2016-17. A review conducted by Management at the beginning of 2017-18 indicated the former PS administrator failed to ensure records were properly recorded and maintained in PS while indicating these tasks were being conducted and coordinated with SCPCSD.

Odyssey maintains a separate Learning Management System (LMS), "Fuel-Ed" to capture its attendance data on a daily basis, and manually re-enters the data into PS. After hiring a new PS administrator, and aligning the two systems, Odyssey identified all withdrawals for the school year coded W36-Dropout, which revealed 148 students (36%) that were dropped from the attendance rolls for truancy during the 2016-17 school year.

Additionally, evidence of attendance/withdrawal documentation was provided in support of the following synopsis of the 21 students that were erroneously coded in PS as graduated, and re-enrolled. The coding error for the 21 students was corrected in PS by SCPCSD.

Student withdrawn-truancy	12	57%
Student transferred to Adult Ed/GED	5	24%
Student was retained (re-enrolled)	3	14%
Student exceeded maximum age for attendance	1	5%
Total Students	21	100%

Of the 21 students, 3 students were retained in the 12<sup>th</sup> grade and re-enrolled in the school.

## Other Observations

### **Public Impact Study**

The SCPCSD contracted with Public Impact to conduct an analysis of how SCPCSD authorized charter schools were performing on a variety of measures related to educational equity and to provide recommendations on its authorizing practices and policies to support improvement. The Public Impact Study ([SCPCSD-Access & Equity Study](#)) was released in April 2017, and included collection and analysis of data on several levels to include: the charter school application process; the performance management process, and accountability; the schools performance and enrollment data; and surveying and interviewing the school leaders to assess the charter school's perception of SCPCSD's current system and processes related to equity. The results of the 37 respondents to the survey revealed:

- 57% indicated resources needed to ensure equal access and equity for students were provided.
- 43% indicated the school was unsupported or under-resourced.

The school leaders shared a variety of suggestions for how the SCPCSD could improve its support efforts. Many of these suggestions were incorporated into the study's recommendations.

The gaps identified in SCPCSD processes by the study and during the SIG's review were:

- The current PS data was often incomplete and/or inaccurate, the SCPCSD should take steps to improve data collection by providing trainings to school staff, conducting regular audits of school data to flag data inconsistencies, and following up with individual schools with routine calls.
- SCPCSD schools were not closely monitored during recruitment and enrollment periods. The SCPCSD should enhance its oversight and monitoring processes.
- SCPCSD provided limited opportunities for school to school collaboration. Multiple school leaders, through the survey and interviews, expressed a desire for the SCPCSD to provide more opportunities for schools to learn from SCPCSD and Department of Education experts, as well as from each other.

### **Guidance for Virtual Charter Schools**

The current state statutes and regulations do not provide guidance for virtual charter schools on the time span for recording attendance outside of the normal Monday through Friday that is allowed for traditional schools. Entries made in PS follow a Monday through Friday school week schedule. However, the virtual charter schools' LMS recognize a full seven-day school week schedule. The attendance records for classroom work performed on Saturday or Sunday, cannot be entered into PS, but rather the school has to maintain a separate record of the time to credit the student's work and attendance. Additionally, virtual LMS's do not interface with PS. As an alternative, each virtual charter school utilized individual ad hoc reports from their individual LMS to manually input attendance records into PS on a monthly basis. Without the ability to directly upload this information into PS, this interjection of potential human error into the PS recordkeeping process exposes the charter school and the SCPCSD to erroneous attendance data. Virtual charter schools expressed the need for guidance from SCPCSD in this area of recordkeeping.

### **Training Opportunities and Assistance**

As indicated by SCPCSD, training opportunities have increased more recently, however the schools expressed concerns that training opportunities were very limited over the past two years. This was a concern also indicated in the recent Public Impact Study. Also expressed was the schools relied very heavily on the past administration to be available to assist them with issues they had with PS, but were not receiving the type of assistance needed.

## **Dissemination of Information**

There is one e-mail per week from the SCPCSD to the schools, “The Operator’s Notes” which provides information from the State Department of Education; however, the schools expressed that the information is usually a month old by the time it is disseminated to the schools.

## **School to School Collaborations**

Cyber Academy has an effective monitoring system that tracks student attendance and activity. This type of system could be shared with the other virtual schools to assist them in better monitoring their students’ attendance and activity. SCPCSD and the charter schools could coordinate their efforts to stimulate more opportunities for school to school collaborations and improve the operations of the charter schools.

## **Changes to Charter Schools’ PS Records**

Attendance data in PS was revised by SCPCSD without prior notification or coordination with a charter school. As part of the state data extract process/deadline that was due to the SC Department of Education, a SCPCSD staff member adjusted data errors previously identified by an internal PS report without notifying the charter school. SCPCSD indicated the errors were corrected by its staff in an effort to clean-up the data and save time with the state approaching deadline. While well-intentioned on the part of the SCPCSD it was only upon questioning by the charter school the PS data changes were researched and explained, causing much concern to the school.

### Recommendations

1. SCPCSD should consider an enhancement to its program oversight and communication channels with the charter schools, provide more guidance and effectively communicate expectations of reporting requirements and define clear escalation paths for unresolved issues/irregularities.
2. In order to improve data collection, SCPCSD should consider an enhancement to its training opportunities to school staff, monitor and audit school data to flag PS data inconsistencies, and routinely follow-up with the schools, preferably on a monthly basis.
3. SCPCSD should consider providing more opportunities for schools to learn from SCPCSD and the Department of Education experts. As well, SCPCSD and the charter schools should coordinate their efforts to stimulate opportunities for school to school collaborations and improve the operations of the charter schools.
4. The four charter schools should ensure that its PS administrators receive the proper training, and guidance to properly conduct their duties and responsibilities. Additionally, the charter schools should ensure its policies and procedures are developed and applied in accordance with state laws and regulations.
5. The SCPCSD should consider coordinating with the four charter schools to assess reported perfect attendance greater than 10%. The attendance average for 33 of the District's schools in 2016-17 was 90%, leaving only 10% with perfect attendance.
6. The SCPCSD should consider the formation of a working group with virtual charter school PS administrators to develop district-wide guidance and processes on virtual LMS and PS recordkeeping.
7. The SCPCSD should consider whether schools would be required to refund state funding for students that remained on the attendance rolls who should have been removed from the school’s student enrollment for exceeding the ten consecutive absences rule. State funding to SCPCSD charter schools is based on the ADM count, a funding formula utilized by SCPCDS for student enrollment in public charter schools.

Closing

As previously set forth, the SIG found no intentional wrongdoing on the part of the four charter schools; but rather the irregularities denoted by SCPCSD were caused by human error. Collaboration between the SCPCSD and the charter schools through a PS working group will be a positive step in limiting human error, and data irregularities in PS records; and will ensure uniformity in the PS process.

The SIG extends its appreciation for the cooperation and courtesies provided during the review by SCPCSD staff and the leadership teams and PS administrators at each of the charter schools who participated in this review and assisted in the gathering of documents. The SIG is available to answer any questions you may have.

I have appended your comments to our review in this letter for future reference and public disclosure.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Lamkin". The signature is written in black ink and is positioned above the printed name and title.

Brian D. Lamkin  
State Inspector General



**Superintendent:**

Elliot Smalley

**Board of Trustees:**

Don McLaurin, Chairman

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Kathleen Bounds, Secretary

Anne Bull

Beth Purcell

Linzie Staley

John Payne

Brian Lamkin  
Office of the Inspector General  
111 Executive Center Dr. STE 204  
Columbia, SC 29210-8416

January 8, 2018

*Re: Response to OIG Independent Review of Attendance and Truancy Recordkeeping at Four Public Charter Schools*

Dear Mr. Lamkin:

The SCPCSD appreciates the OIG's work in conducting the independent review of the four schools identified by the District as having attendance and reporting anomalies. Your analysis validates the presence of the flagged attendance anomalies and attributes cause largely to various degrees of user error ranging from serious and repeated failures to less severe system failures. Your recommendations will be helpful to the District and schools in addressing future episodes of user error by charter schools in the Powerschool area. I especially want to thank Bessie Watson in your office for her professionalism and timely work on this review.

As guided by the South Carolina Charter Schools Act, the South Carolina Public Charter School District (SCPCSD) takes its role as a charter school sponsor seriously in holding charter schools accountable and adhering to the purposes of charter schools in South Carolina as set forth in the Act. Public charter schools operate distinctly from traditional public schools in our state in that charter schools manage and are responsible for many of the day to day educational, financial and operational tasks and processes of running a school. Given this autonomy and added freedom, it is even more critical to ensure the SCPCSD and other charter school sponsors ensure accountability for student learning outcomes and appropriate financial stewardship of state taxpayer funds. During my tenure, I have focused on improving the accountability system and oversight processes in our District to ensure that the state is getting a maximum return on its public investment into schools in our District. To that end, the SCPCSD appreciates your recommendations and has already been in the process of implementing some of these steps to ensure sound and clean data in Powerschool and fiscal monitoring for student payment.

The SCPCSD supports the diversity and uniqueness of different educational models in providing South Carolina families educational choice, including virtual education. While three of the four schools identified for attendance irregularities in the SCPCSD's initial review process were virtual schools that showed a statistically high number of students with perfect attendance, two virtual schools in the District

were not identified as having this issue. As recommendation #5 in your letter indicates, the District is committed to following up with these four schools to examine the perfect attendance issue and will work with the schools and District staff as necessary to clarify the state's attendance rules and recording for the uniqueness of the virtual school model.

More broadly, given our fiduciary responsibility to taxpayers and in accordance with our legal duty, per the Act, to provide oversight as a charter sponsor, we will continue to monitor student attendance practices and look forward to collaborating with your office should the need for further investigation arise.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Smalley". The signature is stylized with a long horizontal stroke at the beginning and a vertical stroke at the end.

Elliot Smalley  
Superintendent, SCPCSD