



State of South Carolina Office of the Inspector General

December 4, 2020

OIG File No: 2020-3473-I

The Honorable Curtis M. Loftis, Jr.
South Carolina State Treasurer
1200 Senate Street, Suite 214
Columbia, SC 29201

RE: Review of the Teach for America – South Carolina Program

Dear Treasurer Loftis:

By letter dated 3/5/2020, the South Carolina Office of the Inspector General (SIG) received a request from your office, the South Carolina Office of the State Treasurer (STO), to review the Teach for America – South Carolina (TFASC) program. ([STO letter, dated 3/5/2020](#))

Your letter raised concerns about the TFASC's inadequate return on investment in the permanent hiring of teachers in comparison to the South Carolina Department of Education's (SCDE) Program of Alternative Certification for Educators (PACE) program. You previously voiced these concerns, among others, to the SCDE and the South Carolina Education Oversight Committee (EOC) by letter, dated 2/3/2020. ([STO letter, dated 2/3/2020](#))

Your concerns spanned the legislative appropriations process to include funding of the TFASC, student achievement and the TFASC's impact in local public school districts, the lack of specific achievement data in TFASC annual reports, and the SCDE's regulatory oversight of alternative teacher certification programs. The SIG's jurisdiction and authority extends only to the executive branch portion in this matter, i.e., the SCDE's oversight of the TFASC program and the flow of Education Improvement Act (EIA) funding through the SCDE to the EOC and eventually the TFASC.

To this end, the SIG reviewed the TFASC's responsiveness to the SCDE's oversight of its alternative teacher certification programs. The following executive summary provides the highlights of this review. The SIG extends its appreciation to you and your staff for bringing this matter to the attention of the SIG, SCDE, and EOC.

Executive Summary

The SIG's scope and objectives focused on two specific issues:

- Did the SCDE perform annual evaluations of the TFASC program as required by the TFASC guidelines approved by the South Carolina Board of Education (SBE)?
- Did the TFASC use state appropriations (i.e., EIA funding) to cover costs associated with TFASC services for which local school districts also paid?

As part of this review, the SIG interviewed SCDE staff, TFASC staff, current and former TFASC partner school districts, and the Center for Educator Recruitment, Retention, and Advancement (CERRA) staff. The SIG reviewed relevant state and federal statutes, regulations, SCDE records, SBE guidelines, and records provided by the SCDE, TFASC, CERRA, and TFASC partner school districts.

TFASC Implementation and SCDE Oversight

The TFASC program is an alternative certification pathway for educators who did not receive teacher education through a traditional teacher preparatory program. As of 11/9/2020, the SCDE provided oversight of ten¹ different alternative certification programs in South Carolina. The TFASC and the SCDE's PACE programs both receive state appropriations for program support.

The SBE approved the TFASC program by a resolution at its [October 2010 SBE Board meeting](#). At that time, the SBE supported the expansion of TFA into South Carolina to help recruit and retain teachers across the state, especially in rural communities. As part of the SBE resolution, the SCDE drafted and presented the TFASC guidelines to the SBE for approval. The SBE approved the [TFASC guidelines](#)² at a [December 2010 SBE Board meeting](#).

The TFASC guidelines identified private funding as the primary source of funding for the launch of the TFASC program, and neither the State of South Carolina nor SCDE would incur any costs as part of the program's initiation.

The [TFASC guidelines](#) further stipulated, "*The South Carolina Department of Education will monitor TFA implementation and will provide an annual report to the State Board of Education on the program's success. Measures of success shall be the number of participants provided to rural school districts in South Carolina, the retention of the TFA teachers during their two-year TFA commitment, the satisfaction of principals regarding the performance of TFA teachers, and evidence of the impact of TFA teachers on student achievement in their classrooms and schools.*"

¹ Program of Alternative Certification for Educators (PACE), American Board, Teach for America – South Carolina (TFASC), Teachers of Tomorrow, Alternative Pathways to Educator Certification (APEC) program, Carolina Collaborative for Alternative Preparation (Carolina CAP), Converse Alternative Certification-Art Education (CACAE), Greenville Alternative Teacher Education (GATE), TeachCharleston, and Specialized Alternative Pathways (Adjunct, Advanced Fine Arts, & Montessori).

² The [TFASC guidelines](#) were revised by the SCDE and approved by the SBE in 2014.

The SIG reviewed copies of the TFASC’s annual reports presented to the SBE by the SCDE since the inception of the TFASC program in fiscal year (FY) 2011-12. The SIG identified only two instances in recent years where the SBE received an update on the TFASC program. However, the SCDE was unable to provide any annual evaluation of the TFASC program that included all measures of success listed in [TFASC guidelines](#).

A SCDE official stated, “In recent years, we have not provided annual reports on Teach for America to the State Board; and, quite simply, this has been an oversight due to a series of personnel changes within the office [SCDE].” The SCDE official further stated a TFASC report was in draft form for presentation to the SBE.

Based on the documentation provided by the SCDE and communication with SCDE staff, the SIG determined the SCDE did not conduct annual monitoring and reporting of the TFASC’s performance sufficient to meet the requirements set forth in the SBE’s [TFASC guidelines](#). The SIG assessed the annual evaluations required by the SBE are essential to a comprehensive analysis of the effectiveness of the TFASC program and the impact of TFA teachers on student achievement in their classrooms and schools.

TFASC and PACE Program Funding Comparisons

The STO’s concerns principally focused on the cumulative “cost per teacher” expenditure of state funds to hire a teacher through the TFASC and PACE programs. Determining the state’s investment in alternative certification programs by the “cost per teacher” analysis does not address teacher effectiveness in the local school districts that utilize TFASC and PACE teachers. However, it is important to understand how state funding correlated to the retention of teachers in the classroom at the conclusion of the programs.

The TFASC received only private funding at the onset of its program in FY 2011-12. During the FY 2011-12 legislative period, the South Carolina General Assembly approved the TFASC for state funding beginning in FY 2012-13.

For the period of FY 2012-13 through FY 2019-20, the TFASC received a total of \$23,000,000 in state appropriations as shown in the following table.

State Appropriations Distributed to TFASC FYs 2013-2020	
<u>FY</u>	<u>Amount</u>
2012-2013	\$2,000,000
2013-2014	\$3,000,000
2014-2015	\$3,000,000
2015-2016	\$3,000,000
2016-2017	\$3,000,000
2017-2018	\$3,000,000
2018-2019	\$3,000,000
2019-2020	\$3,000,000
Total:	\$23,000,000

The TFASC executive director provided the SIG the TFASC budget allocation of the \$3,000,000 for the following general expense categories:

TFASC's Allocation of State Resources	
<u>Expenditure</u>	<u>Amount</u>
Recruitment & Placement	\$ 1,100,000
Teacher Training	\$ 600,000
Coaching & Ongoing Support	\$ 870,000
Retention	\$ 320,000
Total:	\$ 2,890,000

The TFASC executive director further defined each of these categories and the associated expenditures as follows:

- **Recruitment and Placement:** Staff, marketing, interviews for applicants, teacher interviews with placement districts, pre-commitment exploration visits to South Carolina, and signing bonuses.
- **Teacher Training:** Staff, a summer teaching program, summer cost of living grants for incoming teachers, racial equity institute training, and courageous conversations training.
- **Coaching & Ongoing Support:** Staff, travel (including mileage for coaches to partner school districts across the state, orientation, fall teaching and leadership conferences, spring conferences, content facilitators for ongoing trainings, a mentorship program, recognition events, and ongoing professional development for coaching staff.
- **Retention:** Staff, board certification for teachers, workshops and trainings for continuing education units for teachers, networking events, recruitment of community mentors, and a summer internship program.

The [TFASC's FY 2020-21 Financial Report](#) provided the breakdown of actual revenues and expenditures for FY 2019-20. The following table illustrates TFASC's actual expenditures for FY 2019-20.

TFASC Actual Expenditures FY 2019-20	
<u>Expenditure Type</u>	<u>Amount</u>
Personnel Service	\$ 2,136,009
Contractual Services	\$ 243,411
Supplies & Materials	\$ 50,487
Fixed Charges	\$ 211,952
Travel	\$ 114,697
Equipment	\$ 40,262
Other Non-payroll	\$ 572,557
Customized National Support	\$ 431,906
Teaching Corps Fee	\$ 530,000
Total:	\$ 4,331,281

According to the TFASC executive director, TFASC paid \$851,000, or 20%, of its total expenditures to the TFA national corporate office in New York for fees in FY 2019-20. The TFASC executive director

explained the fees paid were for support services, to include human resources, legal support, technical support, recruiting/marketing, and finance.

In addition to state appropriations, TFASC received funding from TFASC's partner school districts. In FY 2019-20, TFASC received \$402,500 from its partner school districts. The SIG interviewed active and inactive TFASC partner school districts to identify the services for which the school districts paid TFASC. The TFASC – School Partnership fees ranged from \$4,500 to \$5,500 per TFASC teacher. These fees were in addition to the salaries paid by the school districts to each TFASC teacher.

Two school districts (hereinafter SD1 and SD2) provided the SIG copies of their agreements with TFASC. In each agreement a section titled "[Fees-for-Service](#)" stated, "*School District shall pay Teach For America an annual fee for each Teacher employed under this Agreement to defray expenses Teach For America incurred in recruiting, selecting, providing pre-service training and continuing professional development services to the Teachers employed by School District under this agreement.*"

The SIG inquired of the SD1 and SD2 officials of their knowledge of the annual EIA funding for TFASC. The SD1 and SD2 officials responded they were unaware the state provided funding to TFASC. The SD2 official found this news to be disturbing as a taxpayer and added it was "almost like double paying."

A rural county school district official (hereinafter SD3), which discontinued its partnership with TFASC, stated SD3 stopped requesting TFASC teachers several years ago because the prior SD3 administration determined the TFASC program was no longer cost effective. The SD3 official recalled at one point in time SD3 utilized 60 TFASC teachers during a given school year, and the cost to SD3 was roughly \$4,000 per teacher or \$240,000 in a given year. The SD3 official believed TFASC charged the district \$4,000 per TFASC teacher to cover the costs associated with teacher recruitment and teacher coaching.

During a SIG interview, the TFASC executive director stated the school partnership fees are for the placement of TFASC teachers in the school districts after selection by the school districts following several rounds of interviews. The TFASC executive director explained the state appropriations TFASC received and the fees from partner school districts were not a "double payment" for services, as it costs TFASC approximately \$4,000,000 a year to operate in South Carolina. The TFASC executive director further advised the TFASC partner school districts pay only a portion of the costs associated with TFASC teachers.

By comparison, the SCDE's PACE program requires a three-year commitment from its participants in the grade level and content area in which the participant teaches.

The [PACE guidelines](#) set forth the eligibility criteria for program candidates. Once PACE eligibility is established the PACE candidate receives an initial alternative teaching certificate that is renewable for up to two additional years, so long as the PACE participant remains employed by the local school district. Local school districts hire PACE teachers through the normal job posting/hiring process and are responsible for the supervision and evaluation of each PACE teacher. The PACE program is funded by PACE participant fees and state appropriations.

According to the SCDE program manager, PACE program participants pay a total of \$500 for the two ten-day PACE trainings associated with their first year of employment and certification. Participants must attend the PACE I Pre-service Institute in July or December of their first year of employment, based on their date of hire. Additionally, they must attend the PACE II In-service in June following their first year in the program.

Beginning in FY 2016-17, the PACE program received state appropriations through SCDE general funds. Since FY 2016-17, the SCDE received \$315,000 in state appropriations each fiscal year to fund the PACE program, or \$1,260,000 through FY 2019-20.

School districts do not pay fees to the SCDE for PACE program participants.

TFASC and PACE Program Teaching Certificates Issued by School Year

The SCDE provided the SIG with a breakdown of the number of alternative teaching certificates issued by year for the TFASC and PACE programs. The SIG used the data to compare the TFASC and PACE programs for the 2016-17 school year through the 2019-20 school year.

The below tables illustrate the total number of alternative teaching certificates issued by the SCDE for the TFASC and PACE cohort programs based on their two-year and three-year program lengths beginning with the 2016-17 school year through the 2019-20 school year. The tables include the number of alternative certificates issued beyond each program’s standard length.

TFASC Certificates Issued by School Year Beginning School Year 2016-17 through 2019-20							
School Year	Year 1 Certificates Issued	Year 2 Certificates Issued	Year 3* Certificates Issued	Year 4* Certificates Issued	Total Certificates Issued	Total State Appropriation Received	Average State Appropriations Per Certificate Issued
2019-20	48	41	18	5	112	\$3,000,000	\$26,785.71
Cohort 3 2018-19	55	37	21	6	119	\$3,000,000	\$25,210.08
Cohort 2 2017-18	43	32	25	5	105	\$3,000,000	\$28,571.43
Cohort 1 2016-17	45	55	34	7	141	\$3,000,000	\$21,276.60

*TFASC is a two-year program though some participants extend into a third year, fourth, fifth, and sixth year.

PACE Certificates Issued by School Year Beginning School Year 2016-17 through School Year 2019-20							
School Year	Year 1 Certificates Issued	Year 2 Certificates Issued	Year 3 Certificates Issued	Year 4* Certificates Issued	Total Certificates Issued	Total State Appropriation Received	Average State Appropriations Per Certificate Issued
2019-20	384	375	313	75	1147	\$315,000	\$274.63
2018-19	424	359	291	63	1137	\$315,000	\$277.04
Cohort 2 2017-18	393	320	264	72	1049	\$315,000	\$300.29
Cohort 1 2016-17	362	300	274	58	994	\$315,000	\$316.90

*PACE is a three-year program though some participants extend into a fourth year.

Comparative Analysis of Cohort Completions for the TFASC and PACE Programs

TFASC – Cohort #1 (2016-17 through 2017-18)

Forty-five (45) alternative teaching certificates were issued to TFASC – Cohort #1 participants in the first year (2016-17) of their cohort program. The number of alternative teaching certificates issued to TFASC – Cohort #1 participants (32) during Year 2 declined 29% from Year 1. Seventy-one percent (71%) of the TFASC – Cohort #1 participants completed the two-year program. For those participants that extended to a third year in the program, the number of alternative teaching certificates issued (21) decreased an additional 34%.

TFASC – Cohort #2 (2017-18 through 2018-19)

Forty-three (43) alternative teaching certificates were issued to TFASC – Cohort #2 participants in the first year of their program. The number of alternative teaching certificates issued to TFASC – Cohort #2 participants (37) during Year 2 declined 14% from Year 1. Eighty-six percent (86%) of the TFASC – Cohort #2 participants completed the two-year program. For those participants that extended to a third year in the program, the number of alternative teaching certificates issued (18) declined an additional 51%.

TFASC – Cohort #3 (2018-19 through 2019-20)

Fifty-five (55) alternative teaching certificates were issued to TFASC – Cohort #3 participants in the first year of their program. The number of alternative teaching certificates issued to TFASC – Cohort #3 participants (41) during Year 2 declined 25% from Year 1. Seventy-five percent (75%) of the TFASC – Cohort #3 participants completed the two-year program.

PACE – Cohort #1 (2016-17 through 2018-19)

In comparison, 362 alternative teaching certificates were issued to the PACE – Cohort #1 participants in the first year of their cohort program. The number of alternative teaching certificates issued to PACE – Cohort #1 participants (320) in Year 2 declined 12% from Year 1. The number of alternative teaching certificates issued to PACE – Cohort #1 participants (291) declined 9% between Year 2 and Year 3. Eighty percent (80%) of the PACE – Cohort #1 participants completed the three-program.

PACE – Cohort #2 (2017-18 through 2019-20)

Similarly, 393 alternative teaching certificates were issued to PACE – Cohort #2 participants in the first year of their program. The number of alternative teaching certificates issued to PACE – Cohort #2 participants (359) in Year 2 declined 9% from Year 1. The number of alternative teaching certificates issued to PACE – Cohort #2 participants (313) declined 13% between Year 2 and Year 3. Eighty percent (80%) of the PACE – Cohort #2 participants completed the three-year program.

Both PACE cohorts retained 80% of their respective cohort participants over the three-year program, whereas, the TFASC cohorts retained fewer cohort participants at the end of their two-year program [SIG emphasis]. Most participants in PACE advance to a standard Professional certificate at the end of the three-program and do not need an Alternative Route certificate in Year 4. The same is true of TFASC; however, not all TFASC corps members opt to pursue a professional certificate and stay in the

classroom beyond the program’s two years. Additionally, the PACE program numbers may not reflect individuals who leave the program but seek readmission at a later date. The PACE program allows individuals the option of seeking readmission one time.

While these numbers only represent those who completed their respective programs and not those who obtained a South Carolina professional certificate, it distinguishes the PACE program from the TFASC program in its ability to retain teachers at a lower cost in state appropriations distributed to the programs.

Comparison of Newly Hired PACE and TFASC Teachers in School Year 2019-20

Each year the CERRA publishes the South Carolina Educator Supply and Demand Report, which includes the results from the South Carolina Annual Educator Supply and Demand survey sent to all South Carolina public school districts.

According to the [2019-20 South Carolina Annual Educator Supply and Demand Report](#), one-half of the teacher vacancies at the beginning of the 2019-20 school year were located in the Pee Dee and Low Country regions. The [2019-20 South Carolina Annual Educator Supply and Demand Report](#) further noted eighteen school districts in the Pee Dee and the Low Country regions had “Excessive teacher turnover.”

These eighteen school districts were also eligible to receive funding through the “rural recruitment initiative.” The state legislature created the Rural Teacher Recruiting Incentive by Proviso 1A.73 in FY 2015-16. This proviso charged the CERRA with the responsibility of developing recruitment and retention incentives for classroom teachers in rural and underserved school districts affected by excessive teacher turnover.

The [2019-20 South Carolina Annual Educator Supply and Demand Report](#) provided the total number of newly hired PACE teachers for the 2019-20 school year was 378.2 full-time equivalents (FTEs), and the total number of newly hired TFASC teachers was 41 FTEs.

The CERRA provided the SIG with documentation that identified the South Carolina school districts in which the newly hired PACE and TFASC teachers were in the 2019-20 school year. The SIG used the [CERRA Regional Map](#) to determine the regions in which each school district was located.

The table below illustrates the number of newly hired teachers through the TFASC and PACE programs, by region, for the 2019-20 school year.

Region	No. of Newly Hired PACE Teachers 2019-20	No. of Newly Hired TFASC Teachers 2019-20	Net No. of Teacher Vacancies at the Beginning 2019-20 School Year
Charter Institute at Erskine*	3	0	26
Savannah River	42	11	65
The Low Country	58.2	18	146.5
The Midlands	105	3	145.5
The Pee Dee	71	9	131
The Upstate	99	0	41.5
Total	378.2	41	555.5

*Schools at the Charter Institute at Erskine are located throughout South Carolina

For the 2019-20 school year, the number of newly hired PACE program teachers in the Pee Dee and Low Country region school districts was 129.2 of the 378.2 total newly hired PACE teachers (34%) in 2019-20. By comparison, the number of newly hired TFASC teachers in the Pee Dee and Low Country regions was 27 out of the 41 (66%) total newly hired TFASC for school year 2019-20.

The [2019-20 South Carolina Annual Educator Supply and Demand Report](#) stated the PACE program accounted for “5 – 6%” of all newly hired teachers each school year. The report further identified the PACE program as the largest producer of alternative certified teachers in South Carolina.

Conclusion

Based on the documentation provided by the SCDE and communication with SCDE staff, the SIG determined the SCDE did not conduct annual monitoring and reporting of the TFASC’s performance sufficient to meet the requirements set forth in the SBE’s [TFASC guidelines](#). The SIG assessed the annual evaluations required by the SBE are essential to a comprehensive analysis of the effectiveness of the TFASC program and the impact of TFA teachers on student achievement in their classrooms and schools.

The 2014-2015 Appropriation Act established Proviso 1A.62 that required school districts that partner with TFASC to provide TFASC with annual academic achievement data of the students taught by TFASC corps members. The TFASC executive director expressed the difficulty TFASC had in obtaining academic achievement data from its partner school districts. In a budget hearing before the EOC on 11/16/20, the EOC advised the TFASC executive director the academic achievement data should be available through the SCDE based upon the TFASC teacher certification number. Providing the data, as required, along with student achievement data reported by teacher certification method, would enable an assessment of the effectiveness of TFASC teachers compared to teachers who received certification through traditional means or through a different alternative certification program.

The SIG further determined TFASC received EIA funding and assessed fees to partner school districts through a Partner School Agreement for similar TFASC services that included recruitment, placement and training of TFASC teachers. The SIG interviewed current and former TFASC partner school districts and found certain school districts were unaware TFASC also received EIA funding for these services.

The SIG would like to extend its gratitude to the staff of the STO, SCDE and TFASC for their assistance throughout this review process.

If you have any questions regarding this review, you can reach me at (803) 896-1287 (direct) or (803) 605-3161 (c).

Sincerely,



Brian D. Lamkin
State Inspector General

Cc: The Honorable Molly Spearman, State Superintendent of Education, SCDE
Ellen Weaver, Chairperson, SC Education Oversight Committee
Matthew Ferguson, Esq., Executive Director, SC Education Oversight Committee
Troy Evans, Executive Director, Teach for America South Carolina