

November 3, 2022

Richland School District Two Response to the Inspector General's 11/3/2022 Report

The Richland Two School District ("District") has reviewed the Inspector General's (IG) Report. First, the District Administration would like to thank the IG for his thorough review. The District welcomes his Report as another dimension of our ongoing quest for excellence.

Notably, the IG Report highlights the District's continued performance in delivering on our core mission: to provide quality public education to more than 112,837 students over the four-year review period. This fact is supported by the District's student achievement metrics included in the Report, which compare favorably with South Carolina and national data (pp. 6-8).

The District agrees with the IG's assertion that the Report is to serve as a road map for District leadership, and the Board of Trustees, to work together to deliver on the promise to prepare students to lead and excel in their chosen pathways to success.

The IG Report also demonstrates that the District is not immune to the pressures that are affecting public and private workplaces, in general, and education in particular – most notably: recruiting challenges, post-pandemic recovery issues, contentiousness and clashes of social values.

Equally noteworthy, the IG Report emphasizes areas where the District Office is understaffed and in need of additional resources.

Importantly, the Report's findings do not assert intentional wrongdoing by the District. A District the size of Richland Two requires constant process evaluations and improvements, and the District intends to use the IG Report as part of our process to make such improvements. The Report found that the District has not consistently had formalized processes in place in all needed areas to ensure best practices. The District welcomes guidance from the Report on methods to continue codifying processes to ensure our District is in full compliance with state and federal law and regulations. Those improvements have begun and are ongoing and some have already been completed.

The District Administration is a team of professionals who have devoted their careers toward working for the betterment of our students, our staff and our community. The District will move quickly and decisively to continue to make needed process improvements.

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The following information is provided for clarification purposes and as further documentation of no intentional wrongdoing by the District:

District Procurement Code

While the District was unable to locate the opinion letter from the Division of Procurement Services approving the District's code, it is apparent that the District and the State have been operating under the understanding that the District's procurement code was substantially similar to the previous state code. The District is not aware of any notification from the Division of Procurement Services or any other oversight agency stating that the District was non-compliant at any point during the period in question. An email from the Division of Procurement Services to the District as recently as February 2022 made clear that while Procurement Services encouraged the District to adopt the 2021 Model Code, the District was under no deadline to do so. There was also no indication in that communication, or any other communication with the Division of Procurement Services, that the District was not in compliance with the law. The District has had annual procurement audits that are submitted to the S.C. Department of Education and have not identified non-compliance issues. In addition, for the 34th consecutive year, the District's finance team received certificates of excellence in financial reporting.

The District has plans in place to revise the District's Procurement Code based on the 2021 Model School District Procurement Code.

District Procurement Cards

The District has a clearly outlined procurement code and established P-Card procedures. The Procurement Team conducts daily and monthly reviews of all P-Card purchases and verifies that appropriate documentation accompanies transactions. The District identifies purchases that may be out of compliance, and those items are brought to leadership's attention and additional information is requested. This review significantly reduces issues that can arise when using P-cards. Principals and Fund Managers approve purchases digitally using the Works system, in lieu of handwritten approvals. In addition, account numbers and descriptions are provided in the Works system and not handwritten on receipts. In recent years, the District has strategically automated internal processes. Subsequently, these strategies created efficiencies that were invaluable during the period of remote processes that resulted from the pandemic and have helped create capacity to balance increasing needs with limited staffing.

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Strategic Plan

The District does have a five-year plan, approved by the State Department of Education that includes goals that are specific, measurable and time bound. To clarify the IG's comments about The Pathway to Premier, this document serves as one component of the overall strategic plan, and is not the entire plan. The District created the Pathway to Premier document as a public information tool so the community at large could learn how the District delivers on the Richland Two mission, pursues the vision, upholds the Core Values, applies the Principle Practices and achieves our Universal Goals. As stated in the report, the next iteration of this single part of the strategic plan will include SMART goals just as the comprehensive five-year plan already does.

Procurement process regarding the District's custodial services contract

As noted within the Report, the District adhered to our established procurement code in the matter involving vendor Service Solutions. The donations made by Service Solutions, which were not considered in the scoring and ranking of the proposals, were used for their intended purpose: to provide scholarships to students and to support the recruitment and retention of qualified men of color as teachers through the Premier 100 initiative.

HHS grant funds

The District wishes to reiterate that it has not at any time intentionally misdirected or diverted District funds to the Foundation. In the case of the grant from HHS that was originally awarded in 2014-2015, the letter from HHS (dated 9/9/2014), which is mentioned in FA-6/ Recommendation 6, lists the Grantee as Richland School District Two Foundation. The District supports the Report's recommendation that it should adopt additional internal controls and processes with the Foundation to ensure that Funds intended for the District are deposited into a District account.

HR Employee Investigative Process

The District's human resources department strives to conduct thorough investigations that include legal guidance as appropriate to ensure the investigation is complete and all documentation is reviewed prior to determining the appropriate action. Nevertheless, the District welcomes the IG's recommendations on how to improve upon the investigative and review process in HR matters and will be evaluating them.

Richland Two Education Foundation

The District is profoundly grateful for the support of the Richland Two Education Foundation over the past two decades and is committed to working with the Foundation to put in place an MOU as recommended by the IG, to support the Foundation's efforts to update its By-Laws and to address other concerns that the IG has raised. The District is confident that the volunteers who have served the Foundation have dedicated their time and talents in good faith and with the sole intention of supporting the Richland Two students and their families as well as our teachers.

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Richland School District Two Board of Trustees Response to the Inspector General's 11/3/2022 Report

We, the elected Members of the Richland Two School Board of Trustees, have reviewed the Inspector General's report. The text of the report makes clear that Board Members must continue to improve in working together for the betterment of our District so the administration is consistently empowered to serve our students, staff and community with excellence and without distraction. Improving academics for kids is the reason each of us sought election to this Board, and we must immediately refocus on them – the students of this District.

The Board's capability to lead is only as strong as our capacity to work through disagreements and find constructive solutions to the challenges facing education. This Board has not always hit that high standard. We commit to excellence moving forward.

It's imperative that Board Members learn and grow as policymakers for this District. We will work civilly and transparently with each other, with District administration and with the public. While our visions for improving Richland Two differ, we will work together to find common ground and to ensure that students are always our chief priority.

Respectfully,

Richland School District Two
Board of Trustees

Board of Trustees

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