



SOUTH CAROLINA
STATE DEPARTMENT
OF EDUCATION

FFY 2010 Annual Performance Report

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Overview of the Annual Performance Report Development

The Annual Performance Report (APR) was developed through a process that included collection of data, verification of data, analysis of data, identification of problems, implementation of improvement activities, provision of technical assistance, and evaluation of progress. The APR process involved stakeholders from various groups involved with service provision for children with disabilities, including South Carolina's Advisory Council.

As part of this FFY 2010 APR, the South Carolina Department of Education (SCDE) worked meticulously to collect, review, analyze, and validate data collected from each local education agency and state-operated program within the state. SCDE staff collaborated with staff from the Office of Special Education Programs, U.S. Department of Education, to ensure that the information in this APR is consistent with the reporting requirements outlined by Section 616 of the Individuals with Disabilities Education Act, 2004 (IDEA). The SCDE also collaborated with numerous technical assistance providers as well as the South Carolina's Advisory Council.

For more information regarding this APR or educational programs for children with disabilities in South Carolina, please contact:

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Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: FAPE in the LRE

Indicator 1: Percent of youth with IEPs graduating from high school with a regular diploma.

(20 U.S.C. 1416 (a)(3)(A))

Measurement: States must report using the graduation rate calculation and timeline established by the Department under the ESEA.

FFY	Measurable and Rigorous Target
2010 (2009 – 2010 data)	Current year must meet the GOAL of 88.3%, or the current year must meet the TARGET OBJECTIVE of 78%, or the current year is 2 percentage points higher than the previous year, or the current year is 2 percentage points higher than the most recent three-year average (including current year) (MET-2% higher than previous year)

Actual Target Data for FFY 2010:

Table 1.1 – Percentage of Students with Disabilities Graduating with a Diploma

2006-2007	2007-2008	2008-2009	2009-10
38.9%	46.1%	43%	45.3%

Table 1.2 – Actual Numbers 2009 – 2010

Number of students in AYP cohort	Number of Students with Disabilities Graduated
55,224	25,016

Data Source: No Child Left Behind Adequate Yearly Progress Report for South Carolina

Section 200.19 of the Title I regulations issued under the Elementary and Secondary Education Act on December 2, 2002, defines graduation rate to mean:

- The percentage of students, measured from the beginning of high school, who graduate from public high school with a regular diploma (not including a GED or any other diploma not fully aligned with the state's academic standards) in the standard number of years; or,
- Another more accurate definition developed by the state and approved by the Secretary in the State plan that more accurately measures the rate of students who graduate from high school with a regular diploma; and
- Avoids counting a dropout as a transfer.

South Carolina used the following methodology in calculating its graduation rates:

Denominator

Step One: Student Count

- All students in the current school year are coded in the student information system with a 9GR value indicating the first year in which each student entered 9th grade for the first time
- Start with all students who are in the 9GR cohort on the 1st day of testing (the 9GR cohort indicating that they entered high school for the first time four years prior to the current graduation year)
- Add all students on the official dropout lists for the three previous years (non-dropouts are not added because they are already documented as legitimate transfers when the dropouts are identified)
- Subtract students whose Individualized Education Programs (IEPs) indicate a graduation rate beyond 4 years (current fourth year students who will graduate after 4 years)
- Add students whose IEPs indicated a graduation rate beyond 4 years (current fifth-year or beyond students who are scheduled to graduate in the current year according to their IEPs)
- Subtract students for whom schools can provide documentation of transfer to another diploma-granting program
- Equals Total Number of Students

All IEP non-diploma track student counts will be included. A student with a disability who receives a regular diploma in the number of years specified in the student's IEP will be considered as a student graduating with a regular diploma in the standard number of years. GED will not be included

Numerator

Step Two: Diplomas

- Number of students receiving regular diplomas in four years or less, unless otherwise specified in the student's IEP.
- Equals Total Number of Diplomas

Calculation

Step Three: Graduation Rate

- Divide Step Two (Total Number of Diplomas) by Step One (Total Number of Students)

South Carolina has stringent guidelines for graduation with a diploma, offering only one recognized academic diploma for all students. Graduation with a state-issued regular diploma in South Carolina requires the completion of twenty-four unit courses in specified areas and the successful passing of an exit exam, the High School Assessment Program (HSAP).

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2010:

The graduation rate for students with disabilities increased 2.3 percent in FFY 2009. The South Carolina Department of Education (SCDE) has placed a statewide priority in the graduation rate for all students. Mick Zais, Ph.D., State Superintendent of Education stated, “Students, parents, and teachers deserve all the credit for the gains made in graduation rates. As the state’s high school graduation rate improves, the prospects for long-term economic growth and job creation increase. If the state is to see gains again next year, schools must maintain their laser-like focus on high school graduation – the state’s economy depends on it.”

The Office of Exceptional Children (OEC) continues to provide professional development in the areas of transition goals and postsecondary outcomes for students with disabilities (see Indicators 13 and 14.) Since the passage of the Economic Education Development Act (EEDA), which requires Individual Graduation Plans for all students, students with disabilities are being included in planning for postsecondary experiences by guidance counselors and general education teachers. This assistance has given students with disabilities access to a greater understanding of their postsecondary options which increases the motivation to stay in school and graduate with a state issued regular high school diploma.

In addition to a state issued regular high school diploma, many districts offer a district level credential. While these are not recognized as a regular high school diploma, these credentials require a specific course of study and completion of certain requirements within the district. Many of these credentials focus on functional and employability skills. Currently the South Carolina Education Oversight Committee is considering introducing a standardized course of study for a state occupational diploma for students with moderate to severe disabilities.

Revisions, with Justifications to Proposed Targets, Improvements/Timelines/Resources for FFY 2011:

None.

Part B State Annual Performance Report (APR) for FFY 2010**Monitoring Priority: FAPE in the LRE**

Indicator 2: Percent of youth with IEPs dropping out of high school.

(20 U.S.C. 1416 (a)(3)(A))

Measurement: States must report using the dropout data used in the ESEA graduation rate calculation and follow the timeline established by the Department under the ESEA.

FFY	Measurable and Rigorous Target
2010	The dropout rate for students with disabilities will decrease to 5.2% (Met)

Table 2.1 – Actual Target Data for FFY 2010

	2007 – 2008	2008 – 2009	2009 – 2010
Number of SWD who dropout ages 14-21	1502	622	917
Number of SWD enrolled ages 14-21	26,620	25,773	26,308
SWD Dropout Rate	5.6%	2.4%	3.5%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

South Carolina met and exceeded its target of 5.2 percent. As required by the Office of Special Education Programs (OSEP), the Office of Exceptional Children (OEC) is reporting the dropout data used in the Elementary and Secondary Education Act (ESEA) graduation rate calculation and following the timeline established by the Department under the ESEA. The South Carolina Dropout Manual containing the definition used for ESEA reporting may be found at:

<http://ed.sc.gov/agency/ac/Student-Intervention-Services/documents/2009DropoutPolicyProc.pdf>

Although the dropout rate for students with disabilities increased this year, the rate remains below the state target and is below the FFY 2007 rate. South Carolina continues to work on improving the overall dropout rate for students. The state has made the dropout rate, along with the graduation rate, a priority for improvement. The South Carolina Department of Education (SCDE) has initiated the 21st Century Community Learning Centers. The mission of the Learning

Centers is to create, support, and enhance programs in order to provide K-12 students and their families with academic and other comprehensive enriching activities beyond the school day. Also, the SCDE was awarded \$486,169 from the Office of Juvenile Justice and Delinquency Prevention (OJJDP) in 2009 for the next four years (2009 – 2013) to implement a site-based, community mentoring project to serve 590 at-risk children in grades 1-3 and 590 mentors in Charleston, Greenville, Orangeburg, and Richland counties and to prevent and reduce gang recruitment and juvenile violence. The goal of the Palmetto Mentoring Network (PMN) is to help at-risk children and their families develop healthy, positive behaviors and resiliency that enable them to resist gang recruitment and violence. These initiatives are directly targeted to reduce the dropout rate overall.

Districts continue to provide options for students with disabilities to encourage staying in school. Many districts have district credentials that require a course of study directly related to a student's post-secondary goals. Although not recognized as a regular state high school diploma, these courses of study encourage students to stay in school

The SCDE continues to provide professional development in the area of transition. The OEC has offered regional training on Indicator 13 compliance, as well as individual training for districts continuing to struggle in the area of transition, and will be offering continued assistance in transition.

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2011:

None

Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: FAPE in the LRE

Indicator 3: Participation and performance of children with IEPs on statewide assessments:

- A. Percent of the districts with a disability subgroup that meets the State’s minimum “n” size that meet the State’s AYP targets for the disability subgroup.
- B. Participation rate for children with IEPs.
- C. Proficiency rate for children with IEPs against grade level modified and alternate academic achievement standards.

(20 U.S.C. 1416 (a)(3)(A))

Measurement:

A. AYP percent = [(# of districts with a disability subgroup that meets the State’s minimum “n” size that meet the State’s AYP targets for the disability subgroup) divided by the (total # of districts that have a disability subgroup that meets the State’s minimum “n” size)] times 100.

B. Participation rate percent = [(# of children with IEPs participating in the assessment) divided by the (total # of children with IEPs enrolled during the testing window, calculated separately for reading and math)]. The participation rate is based on all children with IEPs, including both children with IEPs enrolled for a full academic year and those not enrolled for a full academic year.

C. Proficiency rate percent = [(# of children with IEPs enrolled for a full academic year scoring at or above proficient) divided by the (total # of children with IEPs enrolled for a full academic year, calculated separately for reading and math)].

FFY	Measurable and Rigorous Target
FFY 2010	3A. Percent meeting AYP: The percent of districts meeting AYP objectives for progress in the disability subgroup will be 89% or above. (Not Met)

Table 3A.1 – Actual Target Data for FFY 2010 for Indicator 3.A

Year	Total Number of Districts	Number of Districts Meeting the “n” size	Number of Districts that meet the minimum “n” size and met AYP for FFY 2009	Percent of Districts
FFY 2010	87	87	1	1.1%

FFY	Measurable and Rigorous Target
FFY 2010	<p>3B. Participation Rate</p> <p>The participation rate for children with IEPs on state accountability assessment in the areas of English language arts and math will remain at or above 95% (Met)</p>

Table 3B.1 – Actual Participation Target Data for FFY 2010

Spring 2010 Assessment FFY 2010	Percentage of Students Participating in Statewide Assessments	Number Enrolled	Number Tested
English Language Arts	98.6%	49,576	48,883
Math	99.3%	49,571	49,200

Table 3B.2 – Participation by Assessment in Mathematics

Type of <i>Mathematics</i> Assessment	#of Children with Disabilities Participating	Percentage of Children with Disabilities Participating, Who Took the Specified Assessment
Regular Assessment without Accommodations	14,447	29.4%
Regular Assessment with Accommodations	31,626	64.3%
Alternate Assessment Based on Grade Level Achievement Standards	NOT OFFERED IN SC	
Alternate Assessment Based on Modified Achievement Standards	NOT OFFERED IN SC	
Alternate Assessment Based on Alternate Achievement Standards	31,27	6.4%
Total	49,200	100%

Table 3B.3 – Participation in Assessment in English Language Arts

Type of <i>English Language Arts</i> Assessment	#of Children with Disabilities Participating	Percentage of Children with Disabilities Participating, Who Took the Specified Assessment
Regular Assessment without Accommodations	15,627	32%
Regular Assessment with Accommodations	30,114	61.6%
Alternate Assessment Based on Grade Level Achievement Standards	NOT OFFERED IN SC	
Alternate Assessment Based on Modified Achievement Standards	NOT OFFERED IN SC	
Alternate Assessment Based on Alternate Achievement Standards	3,132	6.4%
LEP < 12 months, took ELP	10	
Total	48,883	100%
Comments:	Ten students with disabilities were limited English proficient (LEP) and in US less than 12 months. The OEC was directed to include students that are LEP and in the US less than 12 months that took the ESL assessment in lieu of the regular assessment.	

FFY Measurable and Rigorous Target

FFY	Measurable and Rigorous Target
FFY 2010	<p style="text-align: center;">3C. Proficiency Rates</p> <p>The performance of students with disabilities grades 3-8 in English language arts meeting standard will be 57.8% in Mathematics and 58.8% in English Language Arts as measured by South Carolina state assessment. (Not Met)</p> <p>The performance of high school students with disabilities in English language arts meeting standard will be 70% in Mathematics and 71.3% in English Language Arts as measured by South Carolina state assessment. (Not Met)</p>

Actual Performance Target Data for FFY 2010

Table 3C.1 – Proficiency on Math Assessment from FFY 2010 Administration

Statewide Assessment		Math Assessment Performance						Total		
		Grade 3	Grade 4	Grade 5	Grade 6	Grade 7	Grade 8	Grade HS	#	%
a	Children with Disabilities	5798	7064	5112	4128	3918	3436	1567	3-8=29,456 HS=1567	
b	SWDs in regular assessment with no accommodations	1650	1582	984	721	754	679	362	3-8=6735 HS=362	3-8=21.6% HS=23%
c	SWDs in regular assessment with accommodations	925	1561	1232	1026	939	870	324	3-8=6553 HS=324	3-8=22.2% HS=21%
d	SWDs in alternate assessment against grade-level standards	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
e	SWDs in alternate assessment against modified standards	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
f	SWDs in alternate assessment against alternate standards	324	389	340	317	266	169	195	3-8=1805 HS=195	3-8=6.1% HS=12%
g	Overall (b+c+d+e+f)	2899	3532	2556	2064	1959	1718	899	3-8 = 14728 HS=881	3-8=50% HS=56%

Note: South Carolina does not offer alternate assessment against grade-level standards or alternate assessment against modified standards.

***SC-Alt is the Alternate Assessment Based on Alternate Achievement Standards.**

Table 3C.2 – Proficiency on Reading Assessment from FFY 2010 Administration

Statewide Assessment 2010-2011		Reading Assessment Performance							Total	
		Grade 3	Grade 4	Grade 5	Grade 6	Grade 7	Grade 8	Grade HS	#	%
a	Children with SWDs	6728	5854	6388	3974	3800	3010	1845	3-8=29,754 HS=1845	
b	SWDs in regular assessment with no accommodations	2040	1536	1141	725	728	672	391	3-8=6,842 HS=391	3-8= 23% HS= 21%
c	SWDs in regular assessment with accommodations	977	964	1676	926	882	646	425	3-8=3,617 HS=425	3-8= 12.2% HS= 23%
d	SWDs in alternate assessment against grade-level standards	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
e	SWDs in alternate assessment against modified standards	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
f	SWDs in alternate assessment against alternate standards	347	427	377	336	290	187	213	3-8=1964 HS=213	3-8= 6.6% HS= 12%
g	Overall (b+c+d+e+f)	3364	2927	3194	1987	1900	1505	1029	3-8=14,877 HS=1029	3-8= 50% HS=56%

Note: South Carolina does not offer alternate assessment against grade-level standards or alternate assessment against modified standards.

***SC-Alt is the Alternate Assessment Based on Alternate Achievement Standards.**

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

South Carolina continues to struggle with meeting AYP performance. The one district that met AYP for students with disabilities was the only district in the state to meet the performance criteria for all students also. South Carolina, however, does continue to achieve large numbers of students with disabilities participating in the AYP state assessments. The South Carolina Department of Education is also applying for a waiver for ESEA requirements.

The Common Core State Standards (CCSS) for English Language Arts and for Mathematics were adopted by South Carolina as its standards in English Language Arts and Mathematics in July of 2010. The standards will be fully implemented in school year 2014-15, including accountability for instruction in the academic areas for students with disabilities. The Office of Exceptional Children (OEC) continues professional development in all curricular areas including the provision of statewide opportunities during our annual Research to Practice Professional Development Institute, which serves special education and general education teachers. Last year over 2000 educators took advantage of this institute.

Public Reporting Information: <http://ed.sc.gov/data/ayp/2011/index.cfm>

National Center and State Collaborative (NCSC) General Supervision Enhancement Grant

NCSC is a general supervision grant out of the Office of Special Education Programs (OSEP) designed to develop a multi-state comprehensive assessment system for students with significant cognitive disabilities. South Carolina Department of Education (SCDE) was invited and agreed to partner with the project during the summer of 2010. The organizational partners include: National Center on Education Outcomes (NCEO), National Center for the Improvement of Educational Assessment (NCIEA), University of Kentucky (UKY), University of North Carolina at Charlotte (UNCC), edCount, LLC, and 19 state partners. The comprehensive assessment system includes instructional materials aligned to the Common Core State Standards, resources and supports for teachers, and formative, interim, and summative assessments. South Carolina has actively participated in two work groups within NCSC – assessment and professional development. Through the professional development work group, a Community of Practice (which includes experienced special education teachers and related service personnel) has been developed and participated in one face-to-face meeting and one webinar. The Community of Practice is charged with implementing model curricula and helping to refine and clarify materials and resources.

Results Component: In October 2011, the SCDE received a verification visit from the OSEP. As a part of that visit, the OEC presented a results component to address student outcomes. The OEC has elected to use the State Personnel Development Grant - SC Gateways from Cradle to Career results to show student outcomes. As part of the grant, the OEC will be working with three schools to improve academic outcomes for students with disabilities in mathematics, reading, and language arts. Each of the schools will receive intensive professional development on the instruction of students with disabilities in both general and special education.

Response Table: In the FFY 2009 SPP/APR response table, the OSEP noted the state did not report publicly on the participation of children with disabilities on statewide assessments at the district and school level with the same frequency and in the same detail as it reports on the assessments of nondisabled children, as required by 34 CFR §300.160(f).

Specifically, the state has not reported: (1) the number of children with disabilities in regular assessments, and the number of those children who were provided accommodations (that did not result in an invalid score) in order to participate in those assessments at the state, district and/or school levels; and (2) the number of children with disabilities, if any, participating in alternate

assessments based on alternate academic achievement standards, at the state, district and/or school levels. The state now has a link at <http://ed.sc.gov/agency/programs-services/173/DataCollectionHistory.cfm> that reports the most current data available on the statewide assessments of children with disabilities in accordance with 34 CFR §300.160(f).

Revisions, with Justification, to Improvement Activities / Targets / Timelines / Resources for FFY 2011.

None.

Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: FAPE in the LRE

Indicator 4A: Rates of suspension and expulsion:

- A. Percent of districts that have a significant discrepancy in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs

(20 U.S.C. 1416(a)(3)(A); 1412(a)(22))

Measurement:

Percent = [(# of districts that have a significant discrepancy in the rates of suspensions and expulsions for greater than 10 days in a school year of children with IEPs) divided by the (# of districts in the State)] times 100.

Include State's definition of "significant discrepancy."

Definition of Significant Discrepancy and Methodology

For the purposes of Part B Indicator 4A, South Carolina defines significant discrepancy as any local education agency (LEA) that meets the following criteria.

Significant Discrepancy: A relative risk ratio exceeding 2.50, without respect to subgroup or group size, in the out-of-school suspension/expulsions of students with IEPs (comparing one LEA to all other LEAs in the state).

Pursuant to 34 CFR § 300.170, South Carolina examines data to determine if significant discrepancies are occurring in the rate of long-term suspensions and expulsions of students with disabilities among LEAs in the state. Data from Section B, Column 3B on Table 5 of Information Collection 1820-0621 (Report of Children with Disabilities Unilaterally Removed or Suspended/Expelled for More than 10 Days) are used to calculate the relative risk.

The Office of Exceptional Children (OEC) identifies districts with significant discrepancies in the rates of long-term suspensions and expulsions through the following steps:

- Using data from Section B, Column 3B, of Table 5 and child count enrollment data from Table 1, the OEC calculates the relative risk ratio separately for each LEA. The relative risk ratio is calculated by:

$$\text{Relative risk ratio (RR)} = \quad RR = \frac{a/b}{c/d}$$

where the variables are expressed in the following 2 by 2 table.

Table 4A.1 – Relative Risk Variable Explanation

Relative Risk	OSS Status	
	OSS> 10 days	Not OSS> 10 days
SWD in District X	<i>a</i>	<i>b</i>
All SWD in all other Districts (less District X)	<i>c</i>	<i>d</i>

- In the above referenced table *b* and *d* are determined by subtracting the number of students in the particular element who received OSS> 10 days from the total reported for the particular element as reported in the same Child Count.
- The OEC identifies the total number of students with disabilities suspended or expelled for each LEA and divides that number by the number of students with disabilities as reported in that LEA's child count data. The OEC aggregates the total number of students with disabilities suspended or expelled for all other LEAs (excluding the one being analyzed), and divides that number by the total number of students with disabilities in all other LEAs in the state. The OEC then divides the suspension/expulsion rate for the one LEA by the suspension/expulsion rate for all other LEAs in the state to obtain the relative risk.
- The resulting number is the relative risk for a LEA, based upon a general linear model, and identifies the degree above or below the average risk for all other LEAs combined
- **Note: As indicated in the definition of significant discrepancy, this calculation is conducted without respect to group or subgroup size; therefore, no LEAs are excluded from the calculation of the relative risk ratio.**

LEAs that have a relative risk ratio exceeding 2.50 are required to review their policies, procedures, and practices to determine whether or not they contributed to the significant discrepancy. To accomplish this, LEAs must complete and submit thorough self-assessment documentation to determine whether or not LEA policies, procedures, and practices relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards to ensure compliance with the IDEA, as required by 34 CFR § 300.170(b) contributed to the significant discrepancy. Once submitted, the OEC reviews the self-assessment documents and may require additional information or other technical assistance activities to determine whether or not LEAs will be issued a finding pursuant to 20 U.S.C. 1412(a)(22) and be required to revise their policies, procedures and practices as outlined by the IDEA regulations governing suspensions and expulsions of students with disabilities.

Table 4A.2 – Actual Target Data for FFY 2010 (using 2009-2010 data)

FFY	Measurable and Rigorous Target
FFY 2010 (using 2009-2010 data)	Percent of districts that have a significant discrepancy in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs will be 5.58% or less. (Not Met with 9.57%)

Table 4A.3 – LEAs with Significant Discrepancy in Rates for Suspension and Expulsion

Year	Total Number of LEAs	Number of LEAs that have Significant Discrepancies	Percent
FFY 2010 (using 2009-2010 data)	94	9	9.57%

Review of Policies, Procedures, and Practices:

For those nine LEAs identified as having significant discrepancy in the rates of long term suspensions and expulsions (i.e., out of school suspensions exceeding ten days as found in Table 5), the OEC required the completion of self-assessment documents and required LEAs to provide evidence of their responses to issues relative to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards. The self-assessment focuses on three areas of compliance:

1. Development and implementation of Individualized Education Programs (IEPs),
 - 34 CFR § 300.304(b)(1), 300.530(a), 300.530(b)(2), 300.530(c), 300.530(d)(1)(i), 300.530(d)(4), 300.530(e)(1), 300.530(e)(1)(i), 300.530(e)(1)(ii), 300.530(e)(3), 300.530(f)(2), 300.530(g), and 300.531
2. Positive behavioral interventions and supports,
 - 34 CFR § 300.324(a)(2)(i), 300.324(a)(3)(i), 300.530(d)(1)(ii), 300.530(e)(1), 300.530(f)(1)(i), and 300.530(f)(1)(ii),
3. Procedural safeguards
 - 34 CFR § 300.500, 300.501(c)(3), 300.504(c)(4), 300.530(d), and 300.530(h)

LEAs were given the opportunity to provide additional details as to other factors contributing to the significant discrepancy in the rates of long-term suspensions and expulsions of students with disabilities. After the LEA submitted the required documentation, OEC staff with expertise in policies, procedures, practices, and data analyses reviewed and conducted follow-up discussions with the identified districts for additional or clarifying information.

The OEC reviewed self-assessment documentation for the nine LEAs which were required to collect information and evidence regarding the development and implementation of IEPs, positive behavioral interventions and supports, and procedural safeguards found in the regulations outlined above. OEC staff, with expertise in this area, found that all nine LEAs had policies, procedures, and practices that comply with the required regulations governing long-

term suspensions and expulsions of students with disabilities. As a result, *no findings of noncompliance were issued based upon data from FFY 2009.*

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2010:

State management of Positive Behavior Interventions and Supports (PBIS) has been provided by staff in the OEC. PBIS has been offered to all LEAs as a school wide process. Districts with concerns or issues in the areas of Indicator 4 have been encouraged to implement PBIS. Training has been provided at no cost to districts across the state. PBIS training has included initial/universal implementation, secondary/tier 2 training, tertiary/tier 3 training, and fidelity processes including the “School Wide Implementation System” data management process, School-Wide Evaluation Tool (“SET”), Benchmarks of Quality, and various self-assessment processes. In addition to scheduled training, the SC PBIS Leadership Team has identified trainers available for contracting by LEAs and schools.

The OEC also provided technical assistance to LEAs in Functional Behavioral Assessment and Behavior Intervention Plan Training (FBA/BIP). FBA/BIP training is available to all LEAs and was given to three districts upon their request. Training in classroom management was also provided to four districts during FFY 2010.

Crisis Prevention Institute (CPI) “train the trainer” training was offered to all LEAs in the state. Thirty participants were newly certified during July 2010 and again July 2011. Currently the state has 118 active trainers. The April 2011 release of “South Carolina Guidelines for Seclusion and Restraint” resulted in a heightened interest across the state in CPI training. In addition, for staff members experienced in both PBIS and CPI, training manuals were made available.

Based upon the FFY 2009 data, as required by the Office of Special Education Programs (OSEP), U.S. Department of Education, the state saw an increase in the number of local education agencies (LEAs) that met the state’s definition of significant discrepancies in the rates of long-term suspensions and expulsions of students with IEPs. As reported in the FFY 2009 Annual Performance Report, the state found five LEAs that exceeded the permissible threshold resulting in their being designated as having significant discrepancies in the suspensions and expulsions of students with IEPs. In FFY 2010 (using FFY 2009 data), the state found nine LEAs that exceeded the permissible threshold of a relative risk ratio of 2.50.

The most significant factor influencing the increase in the number of LEAs identified as having significant discrepancies in their long-term suspensions and expulsions of students with IEPs deals with the state-level changes in the numbers and percentages, which are reflected in the calculation methodology. Put simply, the relative risk ratio is a comparison of the suspension/expulsion rate of one LEA to that of all other LEAs in the state. When the overall number of suspensions and expulsions decrease at the state level, the state-level ratio (or in this instance percentage) decreases. For example, in FFY 2008, there were approximately 2,600 students statewide who were suspended or expelled for more than ten days. Out of approximately 100,000 students with IEPs statewide, that reflects approximately 2.6 percent of all students with

IEPs. In FFY 2009, there were only 1,800 students with IEPs who were suspended or expelled for more than ten days. Out of approximately 100,000 students with IEPs, statewide, that reflects approximately 1.8 percent of all students with IEPs. Because of the overall decrease in the number and percentage of students with IEPs who were suspended, it negatively affected other LEAs that maintained comparable rates of long-term suspensions and expulsions from FFY 2008 to FFY 2009. Of more importance, none of the nine LEAs were found to have policies, procedures, or practices that were inconsistent with 34 CFR § 300.170.

Table 4A.4 – Correction of FFY 2009 Findings of Noncompliance

1. Number of findings of noncompliance the State made during FFY 2009 (the period from July 1, 2009 through June 30, 2010) using 2009-2010 data	1
2. Number of FFY 2008 findings the State verified as timely corrected (corrected within one year from the date of notification to the LEA of the finding)	1
3. Number of FFY 2008 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Verification of Correction (either timely or subsequent):

As noted in the FFY 2009 State Performance Plan and Annual Performance Report, the OEC found that only one LEA did not comply with 34 CFR § 300.530(d) in all instances. The identified LEA noted that it needed to improve its practice of providing parents with notice of their procedural safeguards. As a result, the state issued a finding of noncompliance.

The state verified the timely correction of the one finding of noncompliance noted in the FFY 2009 Annual Performance Report based upon the IDEA Part B Indicator 4A data from FFY 2008 (2008 – 2009) through a review of updated data subsequently collected through both the state data collections and through a desk audit of the revised self-assessment documentation, consistent with OSEP Memorandum 09-02, dated October 17, 2008. Specifically, the LEA had to submit documentation that it was in compliance with providing parents notice of their procedural safeguards. The LEA was required to submit updated data and information, and the OEC received evidence that a) the LEA corrected each individual case of the noncompliance (i.e., providing the notice of procedural safeguards to each student for whom the noncompliance was found); and b) is correctly implementing the regulatory requirements founds at 34 CFR § 300.530(d).

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011 (if applicable):

None.

Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: FAPE in the LRE

Indicator 4B: Rates of suspension and expulsion:

- B. Percent of districts that have: (a) a significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.

(20 U.S.C. 1416(a)(3)(A); 1412(a)(22))

Measurement:

B. Percent = [(# of districts that have: (a) a significant discrepancy, by race or ethnicity, in the rates of suspensions and expulsions of greater than 10 days in a school year of children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards) divided by the (# of districts in the State)] times 100.
Include State's definition of "significant discrepancy."

Overview of Issue/Description of System or Process:

Subsequent to both the submission and the receipt of Office of Special Education Programs' (OSEP) response on the APR last year, the state learned that the calculation methodology the state used did not comply with the expectations on determining significant discrepancies, by race and ethnicity, in the long-term suspensions and expulsions of students with Individualized Education Programs (IEPs). As a result, the state was required to revise its calculation methodology and definition of significant discrepancy for the FFY 2010 SPP and APR related to data from the 2009 – 2010 reporting year.

The state complied with this requirement and has recalculated the 2009 – 2010 data using one of the approved approaches, and has subsequently updated its definition of significant discrepancy. As a result, Indicator 4B is presented in the SPP format.

Definition of Significant Discrepancy:

Using data collected from Table 5 – RE7 – Report of Children with Disabilities subject to Disciplinary Removal (Table 5) and Table 1 – Child Count for the same reporting year, the state employs a relative risk ratio comparing the risk of students of racial/ethnic group y in district X for incidence, type (in-school for more than ten days), type (out-of-school for more than ten days), and duration (for more than ten days) to the risk of all students with disabilities in all other districts (excepting district X) for each respective sub-category. Affectively, the equation becomes:

$$RR = \frac{a/b}{c/d}$$

where the variables are expressed in the following 2 x 2 table example for out-of-school suspensions (OSS) greater than ten days:

Table 4B.1 – Relative Risk Variable Explanation

Risk	OSS Status	
	OSS > 10 days	Not OSS > 10 days
SWD Race/Ethnicity <i>y</i> in District <i>X</i>	<i>a</i>	<i>b</i>
All SWD in all other Districts (less District <i>X</i>)	<i>c</i>	<i>d</i>

In the above referenced table *b* and *d* are determined by subtracting the number of students in the particular element who received OSS > 10 days from the total reported for the particular element as reported in the same Child Count. For each LEA, risk ratios are calculated for each of the seven required reporting race ethnicities including:

- a. African-American
- b. American Native
- c. Asian-American
- d. Hawaiian/Pacific Islander
- e. Hispanic
- f. White/Caucasian
- g. Two or more races

Significant discrepancy exists when any of the seven race/ethnicities’ relative risk ratios exceeds 2.50, with a minimum subgroup population of ten. Though some LEAs may be excluded from having significant discrepancies through this methodology, all LEAs receive onsite monitoring that is both cyclical and needs-based. During the onsite monitoring, suspended and/or expelled student files are reviewed for the related requirements and sanctions or findings are imposed for any noncompliance found.

Actual Target Data for Indicator 4B for FFY 2010 (using 2009-2010 data):

FFY	Measurable and Rigorous Target
FFY 2010 (using 2009-2010 data)	B. Percent of districts that have: (a) a significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards will be 0% (Not Met with 1.09%)

South Carolina collected data for **ninety-four** LEAs and state operated programs (SOPs). Of the **ninety-four** LEAs, two did not meet the subgroup size in the calculation of the relative risk

ratio. Analyses of the FFY 2009 data revealed that twelve LEAs met the criteria for “significant discrepancy” as defined by South Carolina for “Black (not Hispanic)” for Part B Indicator 4B. Data analyses revealed that the twelve LEAs represented each region of the state, and enrolled high numbers of students with disabilities. Of those twelve, one was found to have policies, procedures or practices that contributed to the significant discrepancy and did not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.

Table 4B.2 – LEAs with Significant Discrepancy, by Race or Ethnicity, in Rates of Suspension or Expulsion:

Year	Total Number of LEAs (that meet “n” size requirement)	Number of LEAs that have Significant Discrepancies by Race or Ethnicity	Percent
FFY 2010 (using 2009-2010 data)	92	12	13.04%

Table 4B.3 – LEAs with Significant Discrepancy, by Race or Ethnicity, in Rates of Suspensions and Expulsions; and policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.

Year	Total Number of LEAs (that meet “n” size requirement)	Number of LEAs that have Significant Discrepancies, by Race or Ethnicity, and policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.	Percent
FFY 2010 (using 2009-2010 data)	92	1	1.09%

Review of Policies, Procedures, and Practices

For the twelve LEAs identified as having significant discrepancy in the rates of long term suspensions and expulsions (i.e., out of school suspensions exceeding 10 days as found in Table 5) for any race/ethnicity, the state required the completion of self-assessment documents, and required LEAs to provide evidence of their responses to issues relative to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards. The self-assessment focuses on three areas of compliance:

1. Development and implementation of IEPs,
 - 34 CFR § 300.304(b)(1), 300.530(a), 300.530(b)(2), 300.530(c), 300.530(d)(1)(i), 300.530(d)(4), 300.530(e)(1), 300.530(e)(1)(i), 300.530(e)(1)(ii), 300.530(e)(3), 300.530(f)(2), 300.530(g), and 300.531
2. Positive behavioral interventions and supports,
 - 34 CFR § 300.324(a)(2)(i), 300.324(a)(3)(i), 300.530(d)(1)(ii), 300.530(e)(1), 300.530(f)(1)(i), and 300.530(f)(1)(ii),
3. Procedural safeguards
 - 34 CFR § 300.500, 300.501(c)(3), 300.504(c)(4), 300.530(d), and 300.530(h)

LEAs were given the opportunity to provide additional details as to other factors contributing to the district's significant discrepancy in the rates of long-term suspensions and expulsions of students with disabilities. After the LEA submitted the required documentation, OEC staff with expertise in policies, procedures, practices, and data analyses reviewed and conducted follow-up discussions with the certain districts for additional or clarifying information.

The OEC reviewed self-assessment documentation for the twelve LEAs which were required to collect information and evidence regarding the development and implementation of IEPs, positive behavioral interventions and supports, and procedural safeguards found in the regulations outlined above. OEC staff, with expertise in this area, found that all twelve LEAs had policies and procedures that comply with the required regulations governing long-term suspensions and expulsions of students with disabilities. The OEC found that only one LEA's practices did not comply with the regulations governing long-term suspensions and expulsions of students with disabilities in all instances. The regulations in question relate to 34 CFR § 300.530(e)(1), 300.530(d)(1)(ii), 300.530(e)(1), 300.500, and 300.530(h).

As a result, the OEC is requiring the affected LEA to revise its policies, procedures, and practices relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards, to ensure that these policies, procedures, and practices comply with IDEA (34 C.F.R. §300.170). Pursuant to the general supervision activities of the OEC, the LEA has a finding of noncompliance for Part B Indicator 4B, and is required to correct the systemic issues in both policies and practices relating to use of procedural safeguards to ensure that their policies and practices comply with the IDEA. The LEA must ensure that each individual case of noncompliance has been corrected. The LEA must additionally review updated data of student files to ensure that it is correctly implementing the regulatory requirements. Finally, the LEA must implement a comprehensive plan for addressing the systemic issue.

To verify both prongs of the correction, the OEC is requiring the LEA to complete the following. To verify individual correction, the LEA must conduct folder reviews of each affected student to correct the noncompliance found, and submit a report outlining the correction to the OEC. To verify the systemic correction, the LEA must complete the self-assessment outlining how the specific policies, procedures, or practices have been corrected through a review of more recent updated data including revised policies and procedures, and a review of a subset of student folders who have been more recently suspended or expelled. The LEA must submit that documentation to the OEC for review and approval.

Improvement Activities/Timelines/Resources:

Improvement Activities	Timelines	Resources
Design and implement self-assessment instrument designed to identify systemic issues for suspension and expulsion for LEAs and SOPs and review annually.	<u>February 2006 and ongoing through 2013</u>	<ul style="list-style-type: none"> • OEC Leadership team • LEAs and SOPs • Mid-South Regional Resource Center (MSRRC)
Review and revise existing regulations and policies regarding discipline of students with disabilities to align with IDEA '04.	<u>June 2006 and ongoing through 2013, especially when meeting trigger</u>	<ul style="list-style-type: none"> • OEC staff • LEA staff and other stakeholder • Federal Regulations

Correction of FFY 2009 Findings of Noncompliance

1. Number of findings of noncompliance the State made during FFY 2009 (the period from July 1, 2009 through June 30, 2010) using 2008-2009 data	2
2. Number of FFY 2009 findings the State verified as timely corrected (corrected within one year from the date of notification to the district of the finding)	2
3. Number of FFY 2009 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Verification of Correction (either timely or subsequent):

As noted in the FFY 2009 State Performance Plan and Annual Performance Report, the OEC found that only two LEAs did not comply with 34 CFR § 300.530(d) in all instances. The identified LEAs noted that they needed to improve its practice of providing parents with notice of their procedural safeguards. As a result, the state issued findings of noncompliance.

The state verified the timely correction of the findings of noncompliance noted in the FFY 2009 Annual Performance Report based upon the IDEA Part B Indicator 4B data from FFY 2008

(2008 – 2009) through a review of updated data subsequently collected through both the state data collections and through a desk audit of the revised self-assessment documentation, consistent with OSEP Memorandum 09-02, dated October 17, 2008. Specifically, the LEAs had to submit documentation that it was in compliance with providing parents notice of their procedural safeguards. The LEAs were required to submit updated data and information, and the OEC received evidence that a) the LEAs corrected each individual case of the noncompliance (i.e., providing the notice of procedural safeguards to each student for whom the noncompliance was found); and b) are correctly implementing the regulatory requirements founds at 34 CFR § 300.530(d).

Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: FAPE in the LRE

Indicator 5: Percent of children with IEPs aged 6 through 21 served:

- A. Inside the regular class 80% or more of the day;
- B. Inside the regular class less than 40% of the day; and
- C. In separate schools, residential facilities, or homebound/hospital placements.

(20 U.S.C. 1416(a)(3)(A))

Measurement:

- A. Percent = [(# of children with IEPs served inside the regular class 80% or more of the day) divided by the (total # of students aged 6 through 21 with IEPs)] times 100.
- B. Percent = [(# of children with IEPs served inside the regular class less than 40% of the day) divided by the (total # of students aged 6 through 21 with IEPs)] times 100.
- C. Percent = [(# of children with IEPs served in separate schools, residential facilities, or homebound/hospital placements) divided by the (total # of students aged 6 through 21 with IEPs)] times 100.

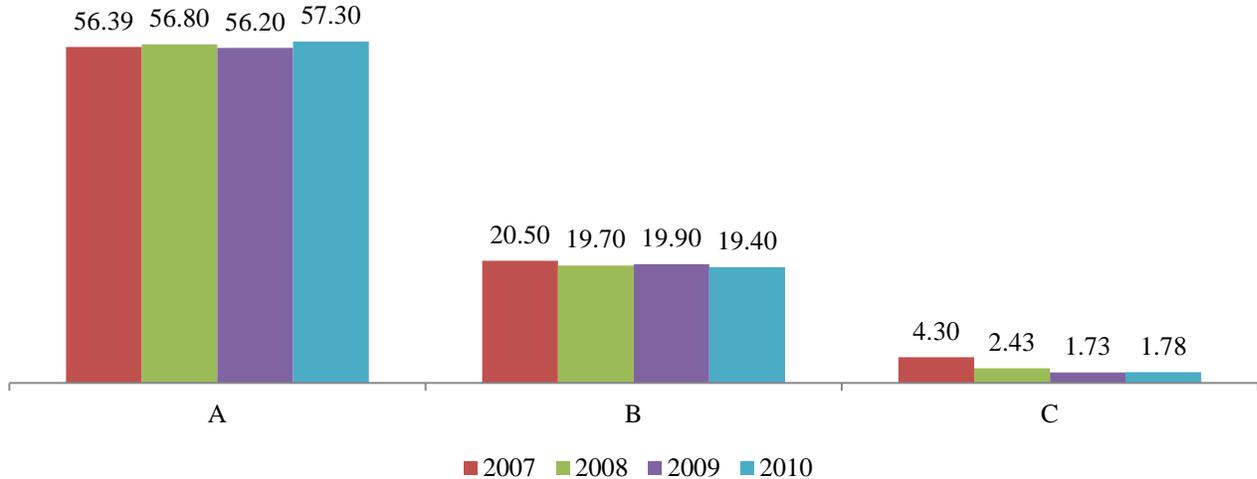
FFY	Measurable and Rigorous Target
2010	a. Increase by 1% from baseline the percent of children with IEPs served inside the regular class 80% or more of the day to target of 55.31%. (Met with 57.3%) b. Decrease by 1% from baseline the percent of children with IEPs served inside the regular class less than 40% of the day to target of 15.45%. (Not Met with 19.4%) c. Maintain or decrease from 2.19% the percent of children with IEPs served in separate schools, residential facilities, or homebound/hospital placements. (Met with 1.78%)

Actual Target Data for FFY 2010:

Table 5.1 – Percentage of Students Ages 6 to 21 with Disabilities by Environment

	Percent of children with IEPs served inside the regular class 80% or more of the day (A)	Percent of children with IEPs served inside the regular class less than 40% of the day (B)	Percent of children with IEPs served in separate schools, residential facilities, or homebound/hospital placements (C)
FFY 2010	57.3%	19.4%	1.78%

Figure 5.1
Percentage of Students with IEPs Served in Different Educational
Environments, by Year



Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

The FFY 2010 target for the percent of children with Individualized Education Programs (IEPs) served inside the regular class 80 percent or more of the day was 55.31 percent. The state met the target and exceeded it by 1.99 percent. The FFY 2010 target for the percent of children with IEPs served inside the regular class less than 40 percent of the day was 15.45 percent. The state did not meet the target of 15.45 percent, but decreased slightly from FFY 2009 by 0.50 percent. The state target to maintain or decrease from 2.19 percent of children with IEPs served in separate schools, residential facilities, or homebound/hospital placements was 1.78 percent, which met the target.

Based upon data from the previous four report years, it seems as if the state has reached a flat-line in the distribution of children with disabilities by their educational environment. Placements in general education settings more than 80 percent of the day rose slightly, though remains approximately 56 – 57 percent. Placements in regular education settings less than 40 percent of the day has changed only one percent in the last four years. While the state has not achieved the targets outlined in the State Performance Plan, placement in this setting may have reached its natural capacity, given the overall placements of students with disabilities. As a result, the OEC will investigate in FFY 2011 whether or not a workgroup should be convened to determine whether or not the targets may need to be revised. Finally, placements in separate settings (5C) have dropped since FFY 2007, but are virtually unchanged from FFY 2009 (+0.05 percent).

The OEC continues in its efforts to use local education agency (LEA) data to improve the least restrictive environment settings for students. For FFY 2010, the OEC continued to count

students in home-based settings in section B, and not in section C. Home-based settings are not the same as medical homebound or hospital settings, but are rather the most restrictive settings for a school-based placement. Furthermore, as shown in Figure 5.1, the state now has seemingly uniform distribution in the percent of students in regular education less than 40 percent of the day. As shown in Figure 5.1, there has been little change in this LRE category over the past four years.

Revisions, with Justification, to Proposed Targets/Improvement Activities / Timelines / Resources for FFY 2010:

None.

Part B State Annual Performance Report (APR) for South Carolina (FFY 2010)

Monitoring Priority: FAPE in the LRE

Indicator 7: Percent of preschool children aged 3 through 5 with IEPs who demonstrate improved:

- A. Positive social-emotional skills (including social relationships);
- B. Acquisition and use of knowledge and skills (including early language/ communication and early literacy); and
- C. Use of appropriate behaviors to meet their needs.

(20 U.S.C. 1416 (a)(3)(A))

Measurement:

Outcomes:

- A. Positive social-emotional skills (including social relationships);
- B. Acquisition and use of knowledge and skills (including early language/communication and early literacy); and
- C. Use of appropriate behaviors to meet their needs.

Progress categories for A, B and C:

- a. Percent of preschool children who did not improve functioning = [(# of preschool children who did not improve functioning) divided by (# of preschool children with IEPs assessed)] times 100.
- b. Percent of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = [(# of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers) divided by (# of preschool children with IEPs assessed)] times 100.
- c. Percent of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it = [(# of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it) divided by (# of preschool children with IEPs assessed)] times 100.
- d. Percent of preschool children who improved functioning to reach a level comparable to same-aged peers = [(# of preschool children who improved functioning to reach a level comparable to same-aged peers) divided by (# of preschool children with IEPs assessed)] times 100.
- e. Percent of preschool children who maintained functioning at a level comparable to same-aged peers = [(# of preschool children who maintained functioning at a level comparable to same-aged peers) divided by (# of preschool children with IEPs assessed)] times 100.

Summary Statements for Each of the Three Outcomes:

Summary Statement 1: Of those preschool children who entered the preschool program below age expectations in each Outcome, the percent who substantially increased their rate of growth by the time they turned 6 years of age or exited the program.

Measurement for Summary Statement 1: Percent = # of preschool children reported in progress category (c) plus # of preschool children reported in category (d) divided by [# of preschool children reported in progress category (a) plus # of preschool children reported in progress category (b) plus # of preschool children reported in progress category (c) plus # of preschool children reported in progress category (d)] times 100.

Summary Statement 2: The percent of preschool children who were functioning within age expectations in each Outcome by the time they turned 6 years of age or exited the program.

Measurement for Summary Statement 2: Percent = # of preschool children reported in progress category (d) plus [# of preschool children reported in progress category (e) divided by the total # of preschool children reported in progress categories (a) + (b) + (c) + (d) + (e)] times 100.

FFY	Measurable and Rigorous Targets		
FFY 2010	A1: 84.69% (Met)	B1: 82.36% (Met)	C1: 84.72% (Met)
	A2: 70.22% (Not Met)	B2: 62.60% (Met)	C2: 82.99% (Not Met)

Target Data and Actual Target Data for FFY 2010:

Table 7.1 – Targets and Actual Data for Preschool Children Exiting in FFY 2010 (2010-11)

Summary Statements	Targets FFY 2010 (% of children)	Actual FFY 2010 (% of children)
Outcome A: Positive social-emotional skills (including social relationships)		
1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they exited the program	84.69%	86.50%
2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program	70.02%	68.55%
Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)		
1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they exited the program	82.36%	86.47%
2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program	62.60%	66.63%
Outcome C: Use of appropriate behaviors to meet their needs		
1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they exited the program	84.72%	89.11%
2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program	82.99%	81.90%

Table 7.2 – Progress Data for Preschool Children FFY 2010

A. Positive social-emotional skills (including social relationships):	Number of children	% of children
a. Percent of children who did not improve functioning	27	1%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	240	9%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	602	22%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	1109	40%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	785	28%
Total	N=2763	100%
B. Acquisition and use of knowledge and skills (including early language/communication and early literacy):	Number of children	% of children
a. Percent of children who did not improve functioning	37	1%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	232	8%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	653	24%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	1066	39%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	775	28%
Total	N=2763	100%
C. Use of appropriate behaviors to meet their needs:	Number of children	% of children
a. Percent of children who did not improve functioning	15	1%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	151	5%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	334	12%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	1024	37%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	1239	45%
Total	N=2763	100%

South Carolina continues to ensure that preschool children with individualized education programs (IEPs) demonstrate improved positive social/emotional skills (including social relationships), acquisition and use of knowledge and skills (including early language/communication and early literacy), and use of appropriate behaviors. The goal of these

quality early interventions is to assist preschool children with disabilities in acquiring the skills necessary to be active and successful participants in kindergarten and first grade classrooms and to minimize the developmental delays experienced by these children. Although the purpose of intervention is to produce better developmental outcomes than would be expected without intervention, for some children with more severe disabilities and delays, these services might only ameliorate the delays and will not result in their achieving functional levels completely commensurate with peers.

In reporting the data for preschool students who received services outlined in Indicator 7, local education agencies (LEAs) employed the Child Outcomes Summary Form (COSF). Data were reported to the Office of Exceptional Children (OEC) by the LEA Special Education Coordinators and/or Preschool Services Coordinator. For each preschool student who received services covered by Indicator 7, the following data were provided to the OEC:

1. LEA (LEA) Name
2. LEA/Agency Code (BEDS)
3. Non-identifiable Student ID
4. Student's date of birth
5. School Program Name
6. Entry Date
7. Outcome 1 (Entry)
8. Outcome 2 (Entry)
9. Outcome 3 (Entry)
10. Exit Date (if available)
11. Outcome 1 (Exit, if available)
12. Progress (Yes or No)
13. Outcome 2 (Exit, if available)
14. Progress (Yes or No)
15. Outcome 3 (Exit, if available)
16. Progress (Yes or No)
17. OSEP Category Outcome 1 (a-e)
18. OSEP Category Outcome 2 (a-e)
19. OSEP Category Outcome 3 (a-e)

Encrypted data was faxed or submitted online to the OEC in the summer of 2011. OEC staff reviewed the data and conducted quality reviews to ensure accuracy of the data for each individual preschool student. These quality review measures included:

1. Determination of age of the preschool child as being aged three to six years at the entry point. Errors (i.e., keystroke entry errors) were reported to the LEA for clarification and revision.
2. Determination that the length of services provided to each child was, at a minimum, six months. For preschool services to children which were less than three months, LEAs were contacted for clarification and revision. If the length of services was confirmed as less than six months, the student data was not included in the exit analyses.

3. Determination of missing data to clarify if any of the data categories listed was missing. LEAs were contacted to review and provide accurate data.

Three outcomes for Indicator 7 were measured at two points – entry into preschool services and exit from preschool services. The three Office of Special Education Programs (OSEP) outcomes measured are:

- Positive social-emotional skills (including social relationships);
- Acquisition and use of knowledge and skills (including early language/ communication and early literacy); and
- Use of appropriate behaviors to meet their needs.

At both entry and exit from preschool services, the preschool service team reached a consensus on the level of functioning on each of the three outcomes along a 7-point Likert scale where the level of functioning ranges from:

1. Not Yet
2. -----
3. Nearly
4. -----
5. Somewhat
6. -----
7. Completely

Entry data were tracked for each preschool student for each of the three outcomes along the seven-point Likert scale determined upon entry, where 1 indicates the Outcome is “Not Yet” to seven where the outcome is “Completely” present. Exit data were tracked for each preschool student for each of the three outcomes along the seven-point Likert scaled determined upon exit, where 1 indicates the Outcome is “Not Yet” to seven where the outcome is “Completely” present.

Using the COSF Excel spreadsheets provided by each LEA, calculations of the three Outcomes of the OSEP categories were determined by comparing entry and exit data to generate the five OSEP progress categories, where:

- a. Did not improve,
- b. Improved but not sufficient to move nearer to same-aged peers,
- c. Improved to a level nearer to same-aged peers but did not reach it,
- d. Improved to reach a level comparable to same-aged peers, or
- e. Maintained functioning at level comparable to same-aged peers.

To determine how the changes in Likert scoring correspond to the five reporting OSEP categories, South Carolina’s analysis was determined by the following:

Table 7.3 – COSF Rating to OSEP Outcome Rubric

OSEP Outcome	COSF Rating
a. Percent of children who DID NOT improve functioning	<ul style="list-style-type: none"> Rated lower at exit than entry; OR Rated 1 at both entry and exit; AND Scored “No” on the progress question (b)
b. Percent of children who improved functioning, but not sufficient to move nearer to same-aged peers	<ul style="list-style-type: none"> Rated 5 or lower at entry; AND Rated the same or lower at exit; AND Scored “Yes” on the progress question (b)
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach it	<ul style="list-style-type: none"> Rated higher at exit than entry; AND Rated 5 or lower at exit
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	<ul style="list-style-type: none"> Rated 5 or lower at entry; AND Rated 6 or 7 at exit
e. Percent of children who maintained functioning at a level comparable to same-aged peers	<ul style="list-style-type: none"> Rated 6 or 7 at entry; AND Rated 6 or 7 at exit

For FFY 2010, the OEC, using a census methodology, collected valid data for 2,763 students ages 3 to 6 who exited preschool services between July 1, 2010 and June 30, 2011. The 2,763 students reflects nearly one and one-half times the number of exiters as reported in the FFY 2009 Annual Performance Report, submitted February 1, 2011, and nearly three times the number (2.85) as reported for the baseline data provided to the OSEP in the FFY 2008 State Performance Plan, submitted February 1, 2010.

While there are more preschool students exiting during the FFY 2010, some state-level differences can be discerned with regard to outcome measures. When comparing percentages reported in the FFY 2009 data to the FFY 2010 percentages, proportionally fewer students were observed with outcome ratings of b, and e. In particular, Category e saw the largest decrease in percentages of students, with ranges of 2.48 percent to 3.95 percent fewer in FFY 2010. Initial review of the data seems to indicate that the reliability of the COSF rating scale may be improved, and that appropriate populations of students are being served.

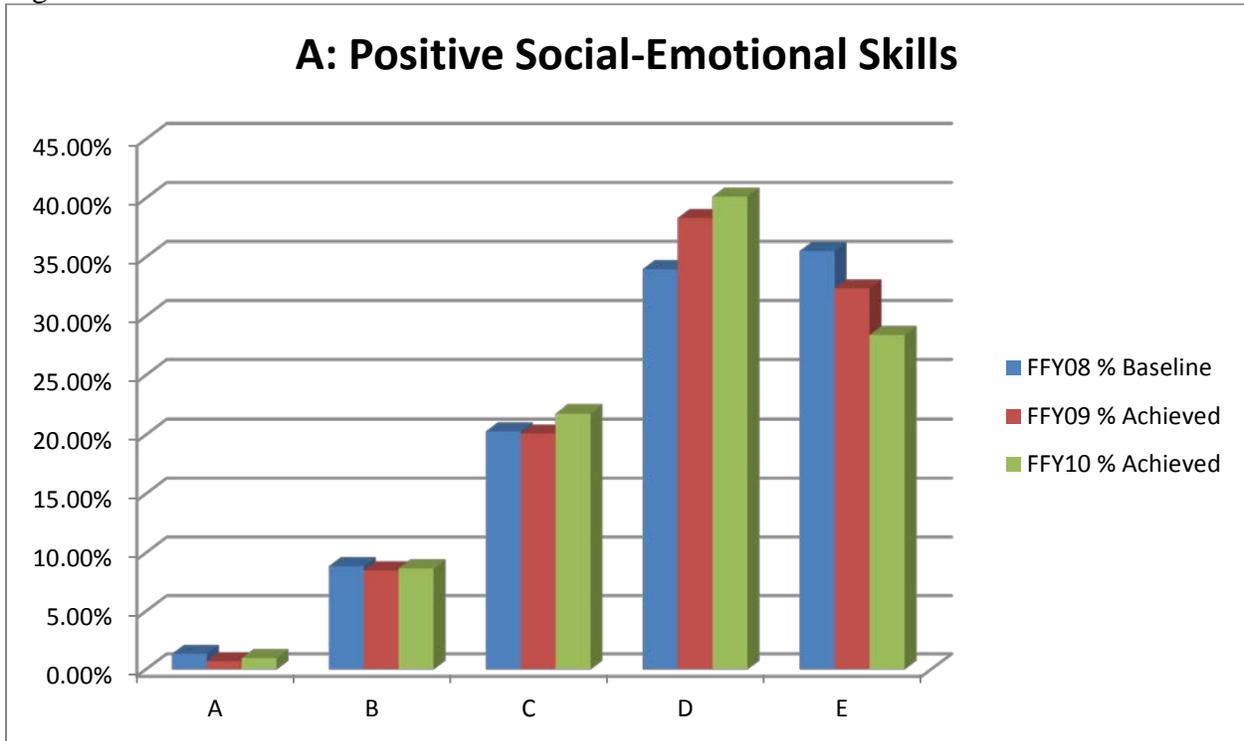
Table 7.4 – Two-year Change in Indicator 7 Outcomes

A. Positive social-emotional skills (including social relationships):	FFY09 Achieved	FFY10 Achieved	Difference
a. Percent of children who did not improve functioning	0.70%	0.98%	0.28%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	8.51%	8.69%	0.18%

c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	20.11%	21.79%	1.68%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	38.32%	40.14%	1.82%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	32.36%	28.41%	-3.95%
Total	N=1845	N=2763	
B. Acquisition and use of knowledge and skills (including early language/communication and early literacy):	FFY09 Achieved	FFY10 Achieved	Difference
a. Percent of children who did not improve functioning	0.98%	1.34%	0.36%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	9.76%	8.40%	-1.36%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	23.90%	23.63%	-0.27%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	34.31%	38.58%	4.27%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	31.06%	28.05%	-3.01%
Total	N=1845	N=2763	
C. Use of appropriate behaviors to meet their needs:	FFY09 Achieved	FFY10 Achieved	Difference
a. Percent of children who did not improve functioning	0.87%	0.54%	-0.33%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	6.12%	5.47%	-0.65%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	10.73%	12.09%	1.36%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	34.96%	37.06%	2.10%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	47.32%	44.84%	-2.48%
Total	N=1845	N=2763	

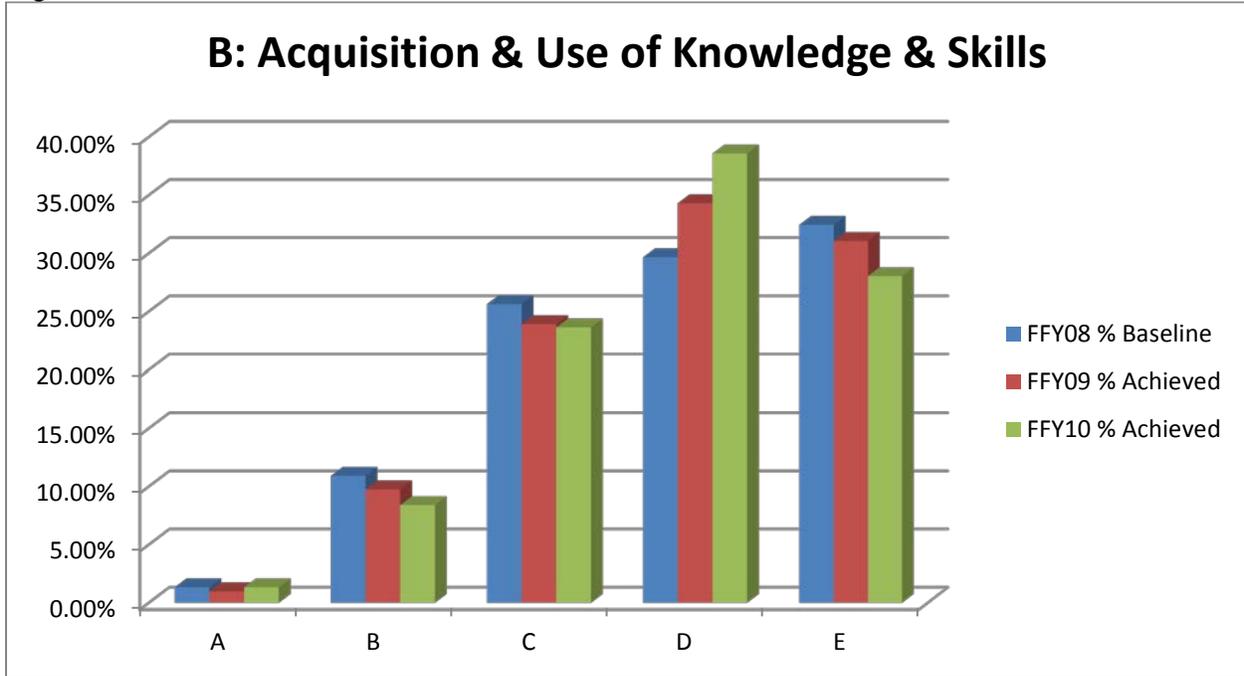
As shown in Figure 7.1, the five OSEP categories (a – e) show marked changes for Outcome A, Positive Social-Emotional Skills. Of particular interest, Category d has shown the largest increase in the number and percentage of students over the last three years, with nearly a seven percent increase. Conversely, Category e has seen a reduction of nearly seven percent in the number and percentage of students from FFY 2008 to FFY 2010.

Figure 7.1



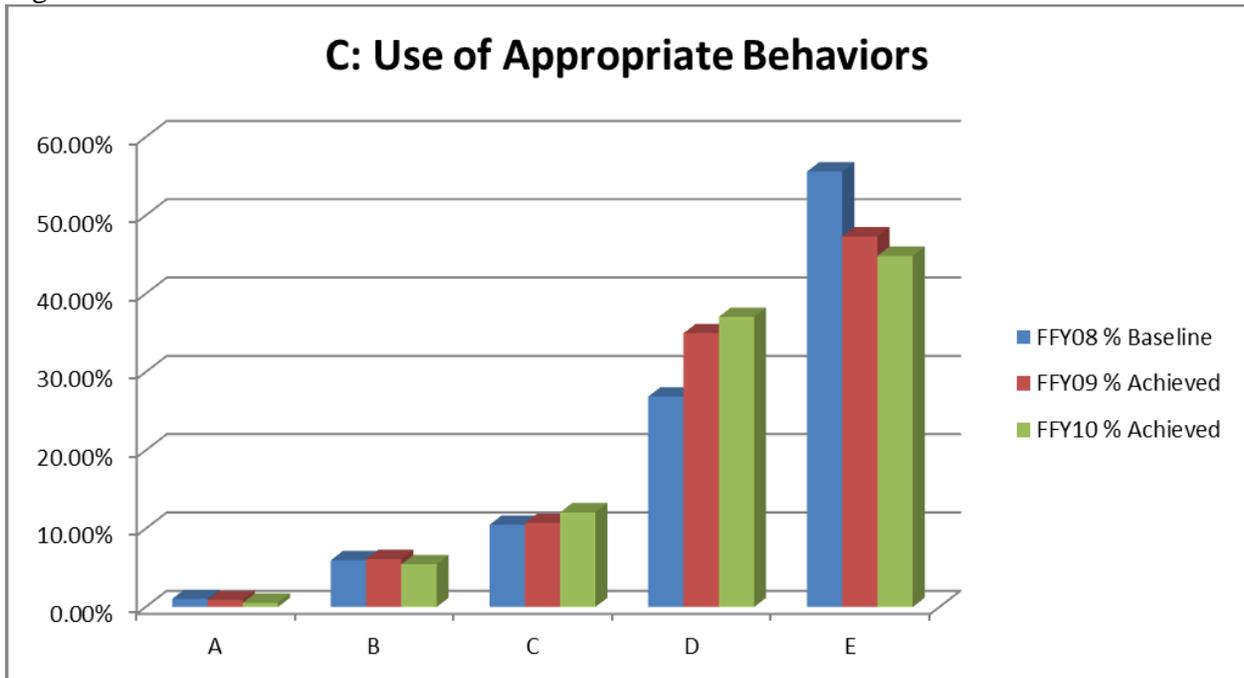
In terms of Outcome B, Acquisition and Use of Knowledge and Skills, similar patterns can be discerned to those of Outcome A, in both changes as well as percentages. Categories a and b show marginal changes and make up the lowest percentages. Category d shows the most growth, and makes up the majority of students. And Category e shows a decline in the percentages (and numbers) from FFY 2008. One difference, however, is Category c. In Outcome A, there is marginal growth from FFY 2008. In Outcome B, there is marginal decrease in the percentages of students.

Figure 7.2



The final outcome addresses the use of behaviors to meet students’ needs. Unlike Outcome A and B, Outcome C has a significant number and percentage of students rated in Category e though these numbers and percentages are declining. These data are represented in Figure 7.3

Figure 7.3



Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

OEC staff recognized that a lack of understanding of the Early Childhood Outcomes process was resulting in ratings being made and subsequent data reported that were neither valid nor reliable. A number of efforts to improve understanding about the process, including data collection, were undertaken. OEC staff provided one-on-one technical assistance to LEA staff on the errors in the data they were reporting and possible reasons for the errors. Enhanced training using a case study methodology and updated materials and resources were presented. LEA data managers were provided training on this indicator as part of their data training. OEC staff and Part C Lead Agency (First Steps/BabyNet) provided joint training on the COSF process. The activities carried out are listed under Training and Technical Assistance.

Recognizing that improvements to inter-rater reliability of the COSF rating scale can be made in South Carolina, the OEC sought to improve reliability by offering more training using a case study methodology. This methodology offered teams the opportunity to gather information on a fictitious child, relate the child's behaviors to the three outcomes, rate the child as individual members of teams then come to a decisions about the team rating, and for teams to compare ratings on the same outcome and discuss reasons for rating differences.

Joint training by staff from Part C and Part B on the Early Childhood Outcomes/ Child Outcome Summary Form process using the case study methodology were presented to an interdisciplinary group of participants representing Part B, Part C, Head Start, and state-operated programs. Two four-hour training sessions were held at the Research to Practice (RTP) Institute in July 2011.

During 2010 – 2011 COSF process trainings, revised and updated training resources and materials related to the COSF rating process were presented along with existing materials at local trainings of interdisciplinary group for feedback. Training participants found the new materials to be easier to follow and more effective. These materials included the revised COSF Rating Scale (Bucket List) and the colorized Decision Tree for Summary Rating. These materials and resources will available on the OEC website.

Training using the case study methodology is planned as part of TA to local district teams for the 2011 – 2012 school year beginning in September 2011. South Carolina continued its participation, during 2010 – 2011, in the three year study to examine the quality of the data produced by the COSF process and to identify ways to improve the quality of the data (ENHANCE) conducted by the Early Childhood Outcomes Center (ECO). One benefit of study participation will be unlimited technical assistance from the ECO around the collection of COSF information at the LEA and state level. Information and regular feedback continued to be provided to the state office.

On February 11, 2011, OEC staff conducted a presentation and discussion on the role of Early Childhood administrators and teachers in serving preschool children with disabilities for

representatives of the Richland and Lexington County School districts. An overview of the Early Childhood Outcomes process for preschool children with disabilities was provided.

To ensure the validity and reliability of the data, the OEC conducted extensive and intensive training regarding this indicator during the 2010 – 2011 report year. Specifically, the OEC conducted six face-to-face reporting requirements seminars during the fall of 2010. These regional sessions covered all IDEA data collections and reporting requirements. Additionally, the OEC provided to LEA staff a comprehensive data manual, containing the reporting requirements and supplemental information, such as the ECO Center's questions and answer documents. Additionally, the OEC conducted technical assistance and training with specific LEAs during the 2010 – 2011 report year, specifically addressing the collection and reporting of the Indicator 7 data. Finally, OEC staff conducted a webinar during the spring of 2011 to discuss Indicator 7 and the reporting requirements. This webinar was shared with all special education personnel in all LEAs and state-operated educational programs.

As shown in the tables and figures on Indicator 7, there are more preschool students reported for the FFY 2010 APR as compared to the FFY 2009 APR. In two of the six outcome targets South Carolina did not meet its targets, namely in the percent of children who were functioning within age expectations in Outcome A and C by the time they exited the program. As indicated in the FFY 2008 SPP and APR, the OEC noted that this category seemed to be inflated, due to many children having high COSF ratings in this area in FFY 2008. As a result, the likely explanation of slippage is that staff is improving with using the COSF rating scale and more appropriate students are receiving services. In addition, since the FFY 2008 SPP, the numbers of children for whom reliable data have been collected has increased nearly three-fold.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011

None.

Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: FAPE in the LRE

Indicator 8: Percent of parents with a child receiving special education services who report that schools facilitated parent involvement as a means of improving services and results for children with disabilities.
(20 U.S.C. 1416(a)(3)(A))

Measurement: Percent = [(# of respondent parents who report schools facilitated parent involvement as a means of improving services and results for children with disabilities) divided by the (total # of respondent parents of children with disabilities)] times 100.

FFY	Measurable and Rigorous Target
2010	31.43 percent of parents with a child receiving special education services report that schools facilitated parent involvement as a means of improving services and results for children with disabilities. Met with 37.4%

Actual Target Data for FFY 2010:

Based upon the sampling plan included in the South Carolina State Performance Plan (SPP) developed at the initiation of the SPP process, South Carolina has eighty-four local education agencies (LEAs) and state operated programs. One of the LEAs, Greenville, has an average daily membership of more than 50,000 students and must be included in the sampling mix each year (per OSEP guidelines). All other LEAs are each included once over the six-year data collection period. The specific mix each year was determined through stratified probability sampling (please see South Carolina SPP). This sampling plan was provided to and approved by the Office of Special Education Programs, U.S. Department of Education (OSEP).

Fourteen LEAs, plus Greenville County Schools, were included in the stratified probability sample for FFY 2010. Those LEAs included:

- Greenwood 52 (Upstate/Small)
- Abbeville (Upstate/Medium)
- Spartanburg 01 (Upstate/Medium)
- Spartanburg 06 (Upstate/Large)
- Union (Upstate/Large)
- Lexington 03 (Midlands/Small)
- Fairfield (Midlands/Medium)
- Lexington 02 (Midlands/Large)
- Richland 01 (Midlands/Ex-Large)

Richland 02 (Midlands/Ex-Large)
Dillon 01 (Coastal/Small)
Dorchester 04 (Coastal/Small)
Clarendon 02 (Coastal/Medium)
Horry (Coastal/Ex-Large)
Greenville

Methodology and Demographics

The University of South Carolina, Institute for Public Service and Policy Research (IPSPR), in collaboration with the Department of Statistics, assisted with the production, surveying, and data analyses of the Part B family survey and report writing for Indicator 8. The *Parent Survey-Special Education*, developed by NCSEAM, was used to capture information from parents within the LEAs for Indicator 8. The survey captured the following information from the above sample:

- The school's efforts to partner with parents;
- Quality of services;
- Impact of Special Education Services on the family;
- Parent participation.

For Part B Indicator 8, the recommended standard was operationalized as a measure of 600, the calibration chosen by the stakeholder group as the minimum amount of partnership effort that can reasonably be said to have met the terms of SPP/APR Indicator 8. Thus, the percent reported to OSEP is the percent of families with measures on the Partnership Efforts scale that are at or above these levels.

Parent Survey- Special Education was available online. To access the survey, parents were sent postcards via mail that provided the weblink and an alpha-numeric identification number to access the survey. Parents were identified using the state's special education software system, Excent©. Using an address file extracted from the state software system, the South Carolina Department of Education, sent postcards to 16,886 parents of children with disabilities in the preselected South Carolina local education agencies (LEAs) enrolled in grades pre-K through 12 and receiving services under IDEA Part B during the 2010 – 2011 school year. The effective response rate was approximately 2.9%. With the overall 412 responses, individual survey items' overall agreement percentages were associated with about a 2.3% margin of error, at a 95% confidence level (assuming a 75% agree response rate; this is usually exceeded, meaning that this margin of error is conservative). The data meet or exceed the NCSEAM 2005 National Item Validation Study's standards for the internal consistency, completeness, and overall quality expected from this survey. Additional analyses were conducted to determine the degree to which the number of respondents is representative of the population of students with disabilities as of the December 01, 2010 Child Count. Following is a discussion of how the survey demographics compare to the population of students with disabilities (ages 3-21).

Representativeness

As shown in Table 8.1, parent respondents of African-American students with disabilities continue to be underrepresented in the federally required reporting categories, though parent respondents of white students are not considerably overrepresented, based upon the 16,886 parents who were sent survey notifications. While parents of African-American students with disabilities are approximately six percent under-represented, the state feels that this is fairly close to being representative.

Table 8.1 – Race/Ethnicity Representativeness

	Respondents	Percentage	Population	Percentage	Difference
American Indian	2	0.49%	232	0.26%	0.23%
Asian	8	1.94%	500	0.55%	1.39%
Black	154	37.38%	39488	43.80%	-6.42%
Hispanic	16	3.88%	3496	3.88%	0.00%
Two or More Races	10	2.43%	0	0.00%	2.43%
White	222	53.88%	46445	51.51%	2.37%
Total	412	100.00%	90161	100.00%	

The next category of analysis used in determining representativeness involved a comparison of the respondents to the category of disability represented in the sample. As shown in Table 8.2, parent respondents of children with speech language impairments are over-represented, whereas parents of children with learning disabilities are underrepresented. It is important to note, however, that these two categories represent the highest percentage and highest numbers of respondents as well as students with disabilities in the state.

Table 8.2 – Disability Representativeness

	Respondents	Percentage	Population	Percentage	Difference
Mental Disabilities	32	7.77%	8564	9.5%	-1.73%
Hearing Impairment	8	1.94%	1022	1.1%	0.84%
Speech Language Impairment	129	31.31%	16975	18.8%	12.51%
Visual Impairment	1	0.24%	403	0.4%	-0.16%
Emotional Disability	8	1.94%	3613	4.0%	-2.06%
Orthopedic Disability	1	0.24%	662	0.7%	-0.46%
Other Disability	37	8.98%	9359	10.4%	-1.42%
Learning Disability	137	33.25%	43334	48.1%	-14.85%
Deaf-Blindness	1	0.24%	2	0.0%	-0.24%
Multiple Disabilities	2	0.49%	542	0.6%	-0.11%
Autism	36	8.74%	2900	0.32%	8.42%
Traumatic Brain Injury	0	0.0%	177	0.2%	-0.2%
Developmental Delay	20	4.85%	2608	2.9%	1.95%
TOTAL	412	100.0%	90161	100.0%	0.00%

Results

With twenty-five six-level items and 412 responses, typical model-based methods for assessing IDEA Part B Indicator 8 (whether schools facilitated parent involvement as a means of improving services for children with disabilities) are likely inappropriate. The IPSPR instead used an empirical approach to the percentage of parents who Agree=A, Strongly Agree=SA, or Very Strongly Agree=VSA with a majority of the twenty-five items on the Partnership Efforts scale. IPSPR first screened parents who failed to answer eight or more items (Table 8.3). The threshold was chosen somewhat arbitrarily, though there was a sharp drop-off between parents who failed to answer seven items and those who failed to answer eight or more items. The reduced sample still accounts for 96.6 percent of respondents.

Table 8.3 – Distribution of Unanswered Items (n=25) on the Partnership Efforts survey

# of Unanswered Items	Frequency	Cumulative Frequency	Cumulative Percent
0	267	267	64.81
1	57	324	78.64
2	20	344	83.50
3	18	362	87.86
4	11	373	90.53
5	11	384	93.20
6	9	393	95.39
7	5	398	96.60
8	1	399	96.84
9	2	401	97.33
11	2	403	97.82
12	1	404	98.06
13	2	406	98.54
14	1	407	98.79
15	1	408	99.03
16	1	409	99.27
17	1	410	99.51
20	1	411	99.76
21	1	412	100.00

IPSPR next considered different criteria for measuring Indicator #8. Considering the percentage of parents who provided agree (A), strongly agree (SA), or very strongly agree (VSA) responses, IPSPR found that in general any criteria it would develop would be too generous. Table 8.4 lists the percentage of parents who provided satisfied responses (assuming the use of A, SA, or VSA to indicate satisfaction). IPSPR provided the counts in reverse order to help demonstrate that using this criterion would be too generous. Parents who answered either A, SA, or VSA to at least a majority of the responses (13 out of 25) comprise 74.6 percent of the sample. Likewise, parents who answered either A, SA, or VSA to at least twenty of twenty-five responses still comprise a majority (51.3 percent) of the sample. This suggests that including Agree as a category in the sample may be inappropriate.

Table 8.4 – Cumulative Count of A, SA, VSA responses

# of A, SA, VSA responses	Frequency	Percent	Cumulative Frequency	Cumulative Percent
25	46	11.56	46	11.56
24	43	10.80	89	22.36
23	36	9.05	125	31.41
22	29	7.29	154	38.69
21	23	5.78	177	44.47
20	27	6.78	204	51.26
19	19	4.77	223	56.03
18	21	5.28	244	61.31
17	16	4.02	260	65.33
16	10	2.51	270	67.84
15	10	2.51	280	70.35
14	11	2.76	291	73.12
13	6	1.51	297	74.62
12	10	2.51	307	77.14

# of A, SA, VSA responses	Frequency	Percent	Cumulative Frequency	Cumulative Percent
11	8	2.01	315	79.15
10	11	2.76	326	81.91
9	11	2.76	337	84.67
8	8	2.01	345	86.68
7	9	2.26	354	88.94
6	6	1.51	360	90.45
5	8	2.01	368	92.46
4	4	1.01	372	93.47
3	7	1.76	379	95.23
2	7	1.76	386	96.98
1	1	0.25	387	97.24
0	11	2.76	398	100.00

Restricting the criteria for “satisfied” responses to SA and VSA (Table 8.5), the OEC and USC found that **37.4 percent of parents answered satisfied** to at least a simple majority (13 of 25) of the items. This straightforward application of the IDEA Part B Indicator 8 criteria provides a percentage of satisfied parents that is quite consistent with estimates computed in past reporting years.

Table 8.5 – Cumulative Count of SA=Strong Agree or VSA=Very Strongly Agree responses

# of SA, VSA responses	Frequency	Percent	Cumulative Frequency	Cumulative Percent
25	13	3.27	13	3.27
24	18	4.52	31	7.79
23	6	1.51	37	9.30
22	16	4.02	53	13.32
21	13	3.27	66	16.58
20	16	4.02	82	20.60
19	11	2.76	93	23.37
18	7	1.76	100	25.13
17	12	3.02	112	28.14
16	6	1.51	118	29.65
15	10	2.51	128	32.16
14	12	3.02	140	35.18
13	9	2.26	149	37.44
12	9	2.26	158	39.70
11	10	2.51	168	42.21
10	7	1.76	175	43.97
9	5	1.26	180	45.23
8	12	3.02	192	48.24
7	5	1.26	197	49.50
6	4	1.01	201	50.50

# of SA, VSA responses	Frequency	Percent	Cumulative Frequency	Cumulative Percent
5	5	1.26	206	51.76
4	17	4.27	223	56.03
3	12	3.02	235	59.05
2	13	3.27	248	62.31
1	37	9.30	285	71.61
0	113	28.39	398	100.00

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

Annually, the South Carolina Department of Education (SCDE), Office of Exceptional Children (OEC), surveys parents of students with disabilities to determine whether or not schools facilitate their involvement as a means of improving services and results for children with disabilities. Throughout the past years, the OEC has contracted with a national organization that specialized in survey design and methodology. Generally, the OEC, through the contractor, surveyed parents in the fall following the school year, so that the OEC could better understand parents' involvement for the whole year.

In Fall 2011, the OEC was poised to survey parents, consistent with the timelines and methodology used for the past five years. In Fall 2011, though, the OEC was informed that the organization with whom the OEC had contracted for five years no longer was conducting surveys for IDEA Part B Indicator 8. As a result, the OEC began an immediate search for a survey contractor.

In December 2011, the OEC met with staff from one of the local institutes of higher education and has begun the steps necessary to contract with the organization. The OEC informed the Office of Special Education Programs of the situation and noted that the data would be available by the time that the revisions are due, following the first reading by OSEP (generally in spring of each year). The OEC was informed to publicly report in its Annual Performance Report (APR), due February 1, 2012, the current status of the surveys. Currently the survey is complete, and the necessary steps are being taken through the South Carolina State government to contract with the local IHE, who has extensive expertise in Rasch modeling, statistical analyses, and survey design. These skills are critical in the analysis of the data for IDEA Part B Indicator 8.

To save time, the OEC plans to conduct a web-based survey to expedite the importing of the data. The OEC has a database with the contact information of parents in the particular local education agencies (LEAs) that were included in the 2010 – 2011 stratified random sampling plan, as outlined in the South Carolina State Performance Plan (SPP). Once the contracts are finalized, the OEC, with its contractor, will move expeditiously to administer, analyze and report the results from parents of children in the sampled LEAs.

The OEC also intends to continue marketing the survey to LEAs and to parents to increase the response rate of parents, particularly those of African-American students with disabilities.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011:

None.

Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: Disproportionality

Indicator 9: Percent of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification.

(20 U.S.C. 1416(a)(3)(C))

Measurement:

Percent = [(# of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification) divided by the (# of districts in the State)] times 100.

The OEC uses data collected on Table 1 (Child Count) of Information Collection 1820-0043 (Report of Children with Disabilities Receiving Special Education under Part B of the IDEA, as amended) for all children with disabilities ages 6 through 21 served under IDEA for calculations on this indicator. These data are collected annually as part of the December 1 Child Count reporting. Note that the term “Local Education Agency (LEA)” is used instead of “district” throughout this document to be consistent with terminology used in reporting other indicators.

Definition of Disproportionate Representation and Methodology

South Carolina uses a multitier process to determine the presence of disproportionate representation in special education and related services due to inappropriate identification. The first step is calculation of weighted risk ratios using data submitted by LEAs in the OSEP 618 data tables. Using the electronic spreadsheet developed by Westat, South Carolina calculates the weighted risk ratios for each LEA with regards to its composition of students in special education along the seven federally reported race/ethnic categories. This weighted risk ratio directly compares the relative size of two risks by dividing the risk for a specific racial/ethnic group by the risk for a comparison group. This determines the specific race/ethnic group’s risk of being identified as having a disability as compared to the risk for all other students. A weighted risk ratio above or below the state established criteria initiates the following process to determine whether the disproportionate representation was due to inappropriate identification. LEAs are determined to have disproportionate representation if they exceed the permissible weighted risk ratio.

Based upon feedback from a stakeholder group in 2010, the OEC redefined the risk ratio to use a fixed weighted risk ratio of 2.50 for overrepresentation and 0.25 for underrepresentation. Thirteen districts were excluded from having disproportionate representation due to a subgroup size of twenty-five or less.

South Carolina defines disproportionate representation as occurring when a LEA has the following:

- a weighted risk ratio greater than 2.50 for overrepresentation, or 0.25 or less for underrepresentation, with a minimum subgroup size greater than twenty-five.

No LEAs were determined to have disproportionate underrepresentation due to inappropriate identification; therefore, no further actions were required by the LEAs in this area.

Determining if Disproportionate Representation is the Result of Inappropriate Identification

Using the established criteria above, the OEC identified one LEA as having disproportionate overrepresentation of racial and ethnic groups in special education and related services. One LEA was determined to have disproportionate representation and was required to undertake the following process to determine whether the disproportionate representation was due to inappropriate identification:

- Examine LEA policies, procedures, and practices involved in the referral, evaluation, and identification of students with disabilities;
- Complete individual folder reviews on a subset of students with disabilities to examine the practices involved in the evaluation and identification of students with disabilities as required by 34 CFR §§ 300.111, 300.201 and 300.301 through 300.311; and
- Submit a summary of findings and evidence to the OEC for verification.

The affected LEA, under the general supervision of the OEC, carefully reviewed all information and evidence to make its determinations of compliance. This review took place as part of the self-assessment process required for all LEAs. Findings would be made based on evidence of noncompliance with any of the related requirements including state level eligibility criteria.

For FFY 2010, the identified LEA was determined to have disproportionate overrepresentation in the race/ethnic category of two or more races. Based upon the initial individual student folder reviews and a review of policies, procedures and practices conducted by this LEA and verified by the OEC, the LEA provided evidence that the disproportionate representation was not due to inappropriate identification.

In FFY 2011 (October 31 – November 4, 2011), the SCDE received a continuous improvement visit (CIV) from the OSEP as part of OSEP's cyclical monitoring of states. During the CIV, the state was informed that its procedures for determining inappropriate identification under 34 CFR §§ 300.713 and 300.600(d)(3), along with its calculation methodology regarding disproportionate representation, were inconsistent with the SPP/APR because the state had heretofore only required LEAs to conduct file reviews of newly identified children when determining whether or not the significant disproportionality was due to inappropriate identification. As a result of the information received during the CIV, the OEC required the one affected LEA to conduct additional file reviews on a subset of all students with disabilities including all newly identified students with disabilities as well as students who received a re-evaluation during the 2010 – 2011 school year. The LEA was required to submit the updated documentation to the OEC for review. The OEC determined that the LEA did not have disproportionate representation due to inappropriate identification based upon the additional files reviewed.

South Carolina had no LEAs (0%) with disproportionate representation of racial and ethnic groups in special education and related services that was the result of inappropriate identification for FFY 2008, 2009, and 2010.

FFY	Measurable and Rigorous Target
FFY 2010	0% of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification. (Met)

Table 9.1 –LEAs with Disproportionate Representation of Racial and Ethnic Groups that was the Result of Inappropriate Identification

Year	Total Number of LEAs	Number of LEAs with Disproportionate Representation	Number of LEAs with Disproportionate Representation of Racial and Ethnic Groups that was the Result of Inappropriate Identification	Percent of LEAs
FFY 2010 (2010 – 2011)	81	1	0	0.00%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

South Carolina’s long-standing focus on addressing issues associated with overidentification and overrepresentation continues to demonstrate required results with zero percent of LEAs having disproportionate representation of racial and ethnic groups resulting due to inappropriate identification. The OEC continues to provide technical assistance to LEAs in the application of evaluation and eligibility criteria during the referral and evaluation process.

In order to ensure that LEAs submitted valid and reliable data, OEC staff conducted extensive training and provided intensive technical assistance to LEAs. With regards to training, the OEC conducted seven regional face-to-face meetings in which Indicator 9 and the related general supervision processes were discussed. OEC staff also conducted a targeted webinar for LEAs that exceeded the weighted risk ratio. Finally, OEC staff worked closely with the particular LEA that had disproportionate representation for Indicator 9.

Revisions, with Justification, to Improvement Activities/Timelines / Resources for FFY 2010 (if applicable):

None.

Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: Disproportionality

Indicator 10: Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification.

(20 U.S.C. 1416(a)(3)(C))

Measurement:

Percent = [(# of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification) divided by the (# of districts in the State)] times 100.

The OEC uses data collected on Table 1 (Child Count) of Information Collection 1820-0043 (Report of Children with Disabilities Receiving Special Education under Part B of the IDEA, as amended) for the disability categories of learning disabilities, mental disabilities, emotional disabilities, autism, speech-language impairment, and other health impairment for children ages 6 through 21 served under the IDEA for calculations on this indicator. These data are collected annually as part of the December 1 Child Count reporting.

Definition of Disproportionate Representation and Methodology

South Carolina uses a multitier process to determine the presence of disproportionate representation in special education and related services due to inappropriate identification. The first step is calculation of weighted risk ratios using data submitted by LEAs in the OSEP 618 data tables. Using the electronic spreadsheet developed by Westat, South Carolina calculates the weighted risk ratios for each LEA with regards to its composition of students in special education along the seven federally reported race/ethnic categories. This weighted risk ratio directly compares the relative size of two risks by dividing the risk for a specific racial/ethnic group by the risk for a comparison group. This determines the specific race/ethnic group's risk of being identified as having a disability as compared to the risk for all other students. A weighted risk ratio above or below the state established criteria initiates the following process to determine whether the disproportionate representation was due to inappropriate identification. LEAs are determined to have disproportionate representation if they exceed the permissible weighted risk ratio.

Based upon feedback from a stakeholder group in 2010, the OEC redefined the risk ratio to use a fixed weighted risk ratio of 2.50 for overrepresentation and 0.25 for underrepresentation. Thirteen districts were excluded from having disproportionate representation due to a subgroup size of twenty-five or less.

South Carolina defines disproportionate representation as occurring when a LEA has the following:

- a weighted risk ratio greater than 2.50 for overrepresentation, or 0.25 or less for underrepresentation, with a minimum race/disability subgroup size greater than twenty-five.

For the FFY 2010 reporting period, South Carolina used a weighted risk ratio of 2.50 for overrepresentation and 0.25 for underrepresentation, with a minimum subgroup size of greater than twenty-five. Thirteen LEAs were excluded across the six disability categories because of subgroup sizes of twenty-five or less.

No LEAs were determined to be “at-risk” for disproportionate underrepresentation; therefore, no further actions were required by the LEAs in this area.

Using these criteria, South Carolina identified thirty-three LEAs for FFY 2010 with disproportionate over-representation of racial and ethnic categories in one or more of the six high incidence disability categories. Six LEAs were considered “at risk” in two categories.

Table 10.1 – FFY 2010 Distribution of Disproportionate Representation

Number of LEAs	Race/Ethnicity	Disability Category
24	African-American	Intellectual Disability
1	White	Autism
2	White	Speech-Language Impairment
5	African-American	Emotional Disability
1	Two or more races	Specific Learning Disability

Determining if Disproportionate Representation is the Result of Inappropriate Identification

All LEAs that are determined to have disproportionate representation must undertake the following process to determine whether the disproportionate presentation is due to inappropriate identification:

- Examine LEA policies, procedures, and practices involved in the referral, evaluation, and identification of students with disabilities;
- Complete individual folder reviews for a subset of student files in the race/ethnic group/disability category determined to be disproportionately represented to examine the practices involved in the evaluation and identification of students with particular impairments as required by 34 CFR §300.111, §300.201 and 300.301 through §300.311; and
- Submit a summary of findings and evidence to the OEC for verification.

An LEA with disproportionate representation in any of the affected race/ethnicities and disability categories carefully reviews, under the general supervision of the OEC, all information and evidence to make its determinations of compliance. This review takes place as part of the self-assessment process required for all LEAs. Findings are made based on evidence of noncompliance with any of the related requirements including state level eligibility criteria.

Using the established criteria above, the OEC identified thirty-three LEAs for FFY 2010 as exceeding the weighted risk ratio threshold of 2.50 for having disproportionate representation of racial and ethnic groups in special education and related services in one or more of the six high

incidence categories. These LEAs were required to conduct folder reviews as well as complete an Indicator 10 rubric to determine whether or not the disproportionate representation was due to inappropriate identification.

In FFY 2011 (October 31 – November 4, 2011), the SCDE received a continuous improvement visit (CIV) from the OSEP as part of OSEP’s cyclical monitoring of states. During the CIV, the state was informed that its procedures for determining inappropriate identification under 34 CFR §§ 300.713 and 300.600(d)(3), along with its calculation methodology regarding disproportionate representation, were inconsistent with the SPP/APR because the state had heretofore only required LEAs to conduct file reviews of newly identified children when determining whether or not the significant disproportionality was due to inappropriate identification. As a result of the information received during the CIV, the OEC required the thirty-three affected LEAs to conduct additional file reviews on a subset of students in the particular affected disability categories, including all newly identified students in the particular disability category as well as all students who received a re-evaluation during the 2010 – 2011 school year for the affected disability category. The LEAs were required to submit the updated documentation to the OEC for review.

Based on the initial and subsequent (December 2011) folder reviews conducted by the LEAs and verified by the OEC, three LEAs showed evidence that the disproportionate representation was due to inappropriate identification.

Table 10.2 – FFY 2010 Distribution of Disproportionate Representation due to Inappropriate Identification

Number of LEAs	Race/Ethnicity	Disability Category
2	African-American	Emotional Disability
1	African-American	Intellectual Disability

Table 10.3 – Actual Target Data for FFY 2010:

FFY	Measurable and Rigorous Target
FFY 2010	0% of LEAs with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification. (Not Met with 3.70%)

Table 10.4 –LEAs with Disproportionate Representation of Racial and Ethnic Groups that was the Result of Inappropriate Identification

Year	Total Number of LEAs	Number of LEAs with Disproportionate Representation	Number of LEAs with Disproportionate Representation of Racial and Ethnic Groups that was the Result of Inappropriate Identification	Percent of LEAs
FFY 2010 (2010 – 2011)	81	33	3	3.70%

Of the 81 LEAs examined for this indicator, South Carolina had 3.70 percent of LEAs (n=3) with disproportionate overrepresentation of racial and ethnic groups in any of the six high incidence disability categories that was the result of inappropriate identification for FFY 2010.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

The number of LEAs determined to have disproportionate representation due to inappropriate identification decreased from four in FFY 2009 to three in FFY 2010.

In order to ensure that LEAs submitted valid and reliable data, OEC staff conducted extensive training and provided intensive technical assistance to LEAs. With regards to training, the OEC conducted seven regional face-to-face meetings in which Indicator 10 and the related general supervision processes were discussed. OEC staff also conducted a targeted webinar for LEAs that exceeded the weighted risk ratio. Finally, OEC staff worked closely with the thirty-three LEAs that had disproportionate representation for Indicator 10.

The OEC also conducted regional and individual trainings for LEAs regarding comprehensive evaluation and re-evaluation processes. The sessions detailed appropriate evaluation and re-evaluation procedures and encouraged districts to attend to practices that may have led to disproportionate representation in the past.

OEC staff participated in conferences and technical assistance calls provided by the OSEP, the Response to Intervention Center, and other Regional Resource Centers.

Correction of FFY 2009 Findings of Noncompliance (if State reported more than 0% compliance):

Level of compliance (actual target data) State reported for FFY 2009 for this indicator: 4.5%

1. Number of findings of noncompliance the State made during FFY 2009 (the period from July 1, 2009 through June 30, 2010)	4
2. Number of FFY 2009 findings the State verified as timely corrected (corrected within one year from the date of notification to the LEA of the finding)	3
3. Number of FFY 2009 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	1

Correction of FFY 2009 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance):

4. Number of FFY 2009 findings not timely corrected (same as the number from (3) above)	1
5. Number of FFY 2009 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”)	0
6. Number of FFY 2009 findings <u>not</u> yet verified as corrected [(4) minus (5)]	1

Actions Taken if Noncompliance Not Corrected:

One finding of noncompliance identified from the FFY 2009 data has not been corrected within the one-year timeline, consistent with the regulatory requirements and OSEP Memorandum 09-02, dated October 17, 2008. With the FFY 2010 data, the local education agency in question has continued noncompliance from the FFY 2009 report year. As a result of this noncompliance, as well as other unresolved noncompliance and a determination of Needs Intervention, the LEA with continued noncompliance to Indicator 10 has received intensive, onsite technical assistance related to the noncompliance and served as a hosting site for a regional training on comprehensive evaluation and eligibility determinations. In addition, the OEC conducted onsite monitoring of student records in Spring 2011. While the LEA has ensured that each individual case of noncompliance has been corrected, and has ensured that its policies are compliant with all applicable requirements, the OEC has not received more recent, updated data from the LEA that would ensure the systemic noncompliance has been corrected, consistent with OSEP Memorandum 09-02, dated October 17, 2008.

Verification of Correction (either timely or subsequent):

The OEC has verified that three of the LEAs identified in FFY 2009 with disproportionate over-representation of racial and ethnic groups in specific disability categories that was the result of inappropriate identification are in compliance with the requirements in 34 CFR §§300.111, 300.201, and 300.301 through 300.311, including that the state verified that each district with noncompliance: (1) is correctly implementing the specific regulatory requirement(s) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a state data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the district, consistent with OSEP Memo 09-02.

Describe of the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2009:

To verify the correction of the noncompliance, LEAs were required to resubmit an Indicator 10 Self-Assessment Rubric that provided concrete examples and information as to how it ensures that its policies and procedures now comply with the applicable related requirements of IDEA Part B Indicator 10. In addition, LEAs had to complete an Indicator 10 Template that outlined

specific students for whom the noncompliance was found. LEAs had to complete the Template documenting that it had corrected each individual case and the date of the correction, unless the student was no longer within the jurisdiction of the LEA. Additionally, the affected LEAs had to submit more recent, updated information (such as folder reviews of a subset of student records in the area of disproportionate representation). Three of the four LEAs completed these requirements and the finding of noncompliance was closed.

Revisions, with Justification, to Improvement Activities/Timelines/ Resources for FFY 2011 (if applicable):

None.

Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: Effective General Supervision Part B / Child Find

Indicator 11: Percent of children who were evaluated within 60 days of receiving parental consent for initial evaluation or, if the State establishes a timeframe within which the evaluation must be conducted, within that timeframe. (20 U.S.C. 1416(a)(3)(B))

Measurement:

- a. # of children for whom parental consent to evaluate was received.
- b. # of children whose evaluations were completed within 60 days (or State-established timeline).

Account for children included in a. but not included in b. Indicate the range of days beyond the timeline when the evaluation was completed and any reasons for the delays.

Percent = [(b) divided by (a)] times 100.

FFY	Measurable and Rigorous Target
<i>FFY 2010</i>	100% (Not Met)

Table 11.1 – Actual Target Data for FFY 2010

98.92% Not Met

The Office of Exceptional Children (OEC) collects data from the statewide special education database, Excent ©, for the purposes of IDEA Part B Indicator 11. The date range for this collection was July 1, 2010 – June 30, 2011. These data are reflective of all students for whom parental consent was received and who received an evaluation consistent with the requirements of IDEA Part B Indicator 11. A team of OEC staff with expertise in data collection, analyses, and reporting reviewed both quantitative and qualitative data from the Excent spreadsheet reports to determine: a) the categorical analysis of each individual student for whom consent to evaluate was received, and b) whether or not there was any noncompliance by any local education agency (LEA).

Table 11.2 – Children Evaluated Within 60 Days

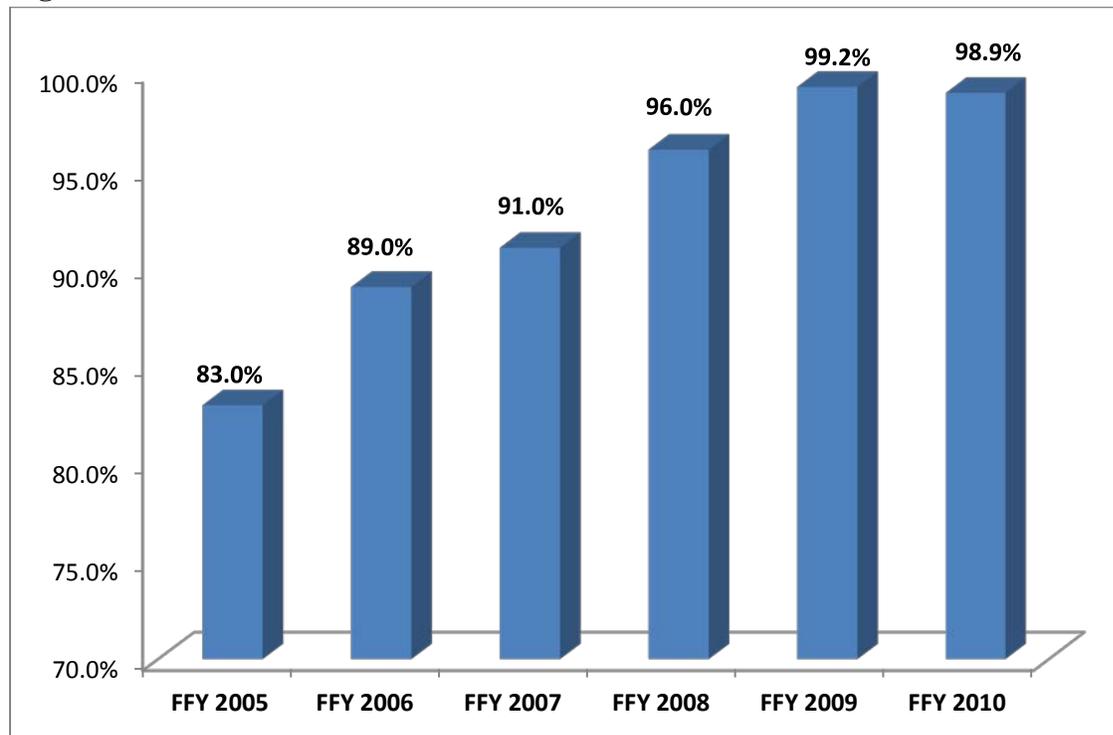
a. Number of children for whom parental consent to evaluate was received	18,589
b. Number of children whose evaluations were completed within 60 days (or State-established timeline)	18,389
Percent of children with parental consent to evaluate, who were evaluated within 60 days (or state established-timeline) (Percent = [(b) divided by (a)] times 100)	98.92%

As shown in Table 11.2, there were 18,589 students for whom consents to evaluate were received that were included in the calculation of Indicator 11 based upon data from the FFY 2010 reporting year (2010 – 2011). This number reflects a decrease of 193 fewer students for whom consents to evaluate were received in FFY 2009. Of the 18,589 students for whom consent was received, 18,389 received an evaluation within sixty calendar days. The effective compliance rate is 98.92 percent, which is a decrease from the FFY 2009 compliance rate of 99.16 percent.

There were 200 students who were not evaluated within the timeline. All 200 of these children, however, subsequently received an evaluation, although late. The range of days beyond the 60-day timeline was from 1 to 167 days, with an average of 20 days. Reasons for the delays (and subsequent noncompliance) included staff turnover, not ensuring that processes continued during school winter and summer breaks, failure to move expeditiously to ensure that an evaluation occurred within sixty calendar days, continuing to engage parents after multiple attempts and methods were involved (resulting in the cases being closed after the 60-day timeline), difficulty with hearing and vision screenings, and for general oversight.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that Occurred for FFY 2010:

As shown in Figure 11.1, there has been a slight decrease in the state's compliance percentage to IDEA Part B Indicator 11 although the difference is less than one-half of a percentage (~0.3 percent). Averaging data from FFY 2009 and FFY 2010, the state is effectively operating at a 99 percent compliance rate, which is far above the state's performance in previous years. The state has conducted considerable technical assistance and training with regard to Indicator 11 and timely, comprehensive evaluations of students with disabilities. In addition, some LEAs continue to struggle with ensuring that comprehensive evaluations are completed in a timely manner. As a result, the OEC has issued findings of noncompliance to any LEA who exceeded the 60-day timelines without just cause, such as parents failing to produce their child for an evaluation, particularly in preschool age children.

Figure 11.1 - Indicator 11 from FFY 2005 to FFY 2010

The OEC has worked to ensure that data reviewed from the state data systems ensures that the OEC reviews timely and accurate data. To achieve this, the OEC first conducts preliminary data checks for all LEAs and SOPs to ensure that data are accurate and that any remaining documentation is provided to the OEC. Second, the OEC conducts follow-up technical assistance to ensure the validity of its interpretations of the data from the statewide database when classifying students into the particular categories outlined by the Indicator 11 calculation formula. Third, the OEC has begun conducting onsite monitoring to ensure that LEAs within the state comply with all the related IDEA requirements, including Indicator 11, along with ensuring that noncompliance is corrected as soon as possible but in no case later than one year of notification and consistent with OSEP Memorandum 09-02, dated October 17, 2008. Corrective actions that LEAs must undertake include conducting an IEP team meeting for each eligible students for whom the noncompliance was found to ensure that there were no basic denials of any IDEA rights, including the provision of a free appropriate public education. These corrective actions, including additional corrective actions, reinforce the importance to LEA's adherence to Indicator 11 and the related IDEA requirements.

To ensure that the data collected and reported were valid and reliable, OEC staff conducted seven face-to-face regional trainings in which Indicator 11 was discussed at length. Additionally, OEC staff provided all LEAs and state-operated programs in the state with a recorded webinar training module on how to collect and report Indicator 11 data for the educational programs serving preschool children. OEC staff conducted multiple reviews of all LEA's data to ensure that LEA's were reporting accurately. A considerable amount of individual technical assistance was held with many LEAs in the state with particular questions regarding Indicator 11.

Through a review of the statewide data collection system (i.e. Excent), the OEC staff recognized the need to inform local education agencies of the requirement for a full and individual evaluation for any child suspected of being a child with a disability. The OEC undertook specific efforts to improve the understanding of the requirements for an evaluation that identifies all of the child’s educational and/or related service needs. These efforts included:

- Statewide regional trainings to describe the requirements for and procedures related to:
 - Child Find
 - Consent and Parental Consent
 - Evaluation
 - Response to Intervention
- The development and dissemination of two ETV/ eMedia (ITV) professional development modules entitled *The Top 10 Reminders for IEP Development, and Implementation, and Evaluation.*
- Numerous technical assistance sessions to targeted LEAs in the state addressing comprehensive evaluations and Indicator 11.

Correction of FFY 2009 Findings of Noncompliance (if State reported less than 100% compliance):

Level of compliance (actual target data) State reported for FFY 2009 for this indicator: 99.2%

1. Number of findings of noncompliance the State made during FFY 2008 (the period from July 1, 2009 through June 30, 2010)	46
2. Number of FFY 2009 findings the State verified as timely corrected (corrected within one year from the date of notification to the LEA of the finding)	46
3. Number of FFY 2009 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0
4. Number of FFY 2009 findings not timely corrected (same as the number from (3) above)	0
5. Number of FFY 2009 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”)	0
6. Number of FFY 2009 findings <u>not</u> verified as corrected [(4) minus (5)]	0

Verification of Correction of FFY 2009 noncompliance (either timely or subsequent)

To verify correction of the noncompliance identified in the database review of Indicator 11, the OEC required that each individual case of noncompliance be corrected as soon as possible, but in no case later than one-year of the notification of the finding of noncompliance. For Indicator 11, this indicated that each LEA had to ensure that it had completed the evaluation, although late, for any child whose initial evaluation was not timely, unless the child was no longer within the jurisdiction of the LEA, consistent with OSEP Memorandum 09-02, dated October 17, 2008. In addition, the OEC conducted subsequent (i.e., more recent) reviews of the database from each of the eight LEAs with noncompliance to ensure that they were correctly implementing the regulatory requirements. Through this verification process, the OEC determined that, based upon a review of more recent, updated data, all of LEAs had corrected their noncompliance within one-year of notification.

Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2009:

LEAs with noncompliance were issued letters of findings following the extraction, analysis, and review of the data from the statewide database (Excent©). The OEC conducted follow-up technical assistance with LEAs to ensure that both qualitative and quantitative data were accurate and reliable. Once the dataset was determined to be valid and reliable, OEC staff reviewed all information for all children for whom consent to evaluate was received. Based upon that review, the OEC determined noncompliance for 46 LEAs. The OEC issued letters of finding to 46 LEAs with noncompliance.

In the letter of finding, LEAs with noncompliance were required to:

1. Ensure that they had completed the evaluation, although late, for any child whose initial evaluation was not timely, unless the child was no longer within the jurisdiction of their LEA, consistent with OSEP Memorandum 09-02, dated October 17, 2008, and submit such documentation to the OEC for review, and
2. Ensure that data were kept up-to-date and participate in quarterly reviews of more recent updated data to ensure it was correctly implementing 34 CFR §300.124(b), (i.e., achieved 100% compliance).
3. Complete a corrective action plan identifying and addressing the root causes of the noncompliance, submit the plan to the OEC for review and approval, and complete the activities outlined therein.

The OEC received the documentation outlined above and verified that each of the LEAs were correctly implementing the requirements found at 34 CFR §300.124(b).

It is important to note that during FFY 2010, the OEC revised its general supervision system to address and monitor the timely correction of noncompliance, as described in the OSEP Response Table.

Correction of Remaining FFY 2007 AND 2008 Findings of Noncompliance:

1. Number of remaining FFY 2007 and 2008 findings noted in OSEP's June 2011 FFY 2009 APR response table for this indicator	6
2. Number of remaining FFY FFY 2007 and 2008 findings the State has verified as corrected	4
3. Number of remaining FFY 2007 and FFY 2008 findings the State has NOT verified as corrected [(1) minus (2)]	2

Verification of Correction of Remaining FFY 2007 and 2008 findings:

To verify correction of the continued, longstanding noncompliance identified in the database review of Indicator 11 from previous reporting years, the OEC required that each individual case of noncompliance be corrected as soon as possible, but in no case later than one-year of the notification of the finding of noncompliance. For Indicator 11, this indicated that LEAs had to ensure that it had completed the evaluation, although late, for any child whose initial evaluation was not timely, unless the child was no longer within the jurisdiction of the LEA, consistent with OSEP Memorandum 09-02, dated October 17, 2008. In addition, the OEC conducted ongoing quarterly reviews of more recent data from the statewide database from each of the 6 LEAs with noncompliance to ensure that they were correctly implementing the regulatory requirements. Through this verification process, the OEC determined that, based upon a review of more recent, updated data, 4 of the 6 LEAs had corrected their noncompliance within one-year of notification, and consistent with OSEP Memorandum 09-02, dated October 17, 2008.

Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2008:

LEAs with continued, longstanding noncompliance were issued notifications following the extraction, analysis, and review of the data from the statewide database (Excent©). The OEC conducted follow-up technical assistance with any LEAs to ensure that both qualitative and quantitative data were accurate and reliable. Once the dataset was determined to be valid and reliable, OEC staff reviewed all information for all children for whom consent to evaluate was received. Based upon that review, the OEC determined noncompliance for five LEAs. The OEC issued letters of finding to six newly identified noncompliant LEAs and to two LEAs with longstanding noncompliance.

In the notification letters, LEAs with continued, longstanding noncompliance were required to:

1. Ensure that they had completed the evaluation, although late, for any child whose initial evaluation was not timely, unless the child was no longer within the jurisdiction of the LEA, consistent with OSEP Memorandum 09-02, dated October 17, 2008, consistent with OSEP Memo 09-02, and submit such documentation to the OEC for review, and

2. Ensure that data were kept up-to-date and participate in quarterly reviews of more recent updated data to ensure it was correctly implementing 34 CFR §300.124(b), (i.e., achieved 100% compliance).
3. Revise their corrective action plan identifying and addressing the root causes of the noncompliance, submit the plan to the OEC for review and approval, and complete the activities outlined therein.

The OEC received the documentation outlined above and verified that each of the four of the six LEAs were correctly implementing the requirements found at 34 CFR §300.124(b), and subsequently received notifications closing the noncompliance found.

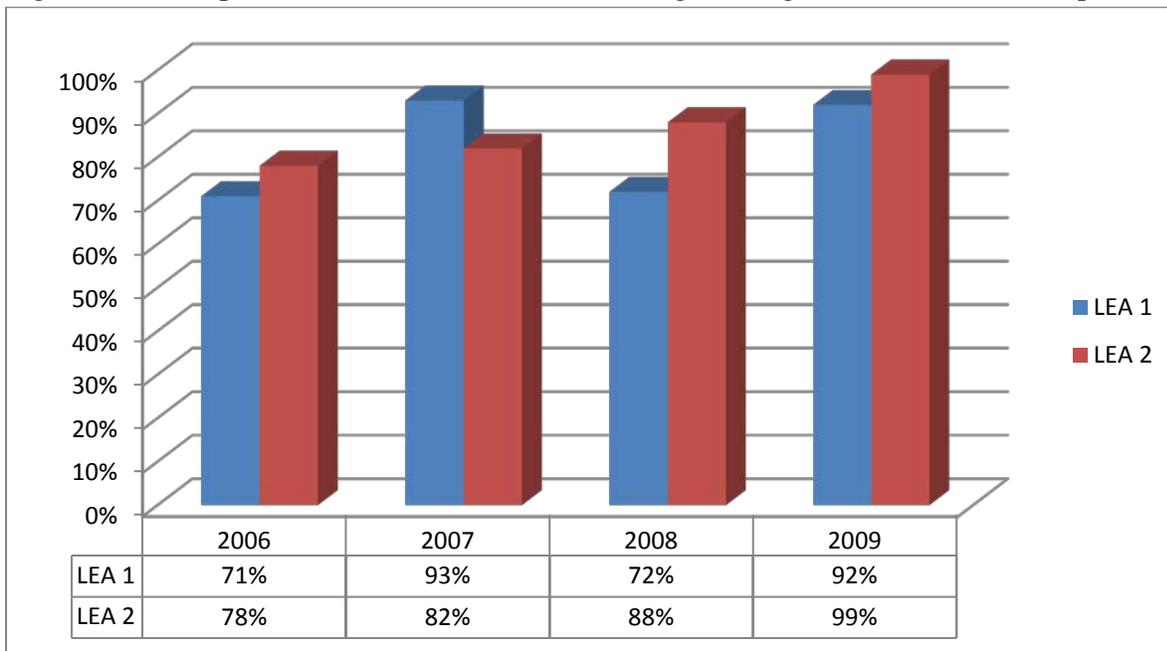
It is important to note that during FFY 2010, the OEC revised its general supervision system to address and monitor the timely correction of noncompliance, as described in the OSEP Response Table.

The two LEAs with longstanding noncompliance have received intensive general supervision including training and technical assistance both virtually as well as onsite. These two LEAs contain numerous schools and large numbers of students with disabilities. Yearly, each school receives between 600 and 1,500 consents for evaluations. Both LEAs have demonstrated substantial compliance and have ensured that each individual case of noncompliance has been corrected. The difficulty has been a review of more recent, updated data to verify that the LEA has corrected the noncompliance. In the past, the OEC has conducted quarterly reviews of data from the statewide database (January, April, July, October). Using guidance provided by the Office of Special Education Programs (OSEP), the OEC and the LEAs will:

- a. Address in a stronger fashion the root-causes of the noncompliance,
- b. Investigate the possibility of changing the quarterly review system for these specific LEAs, and
- c. Continue providing intensive and ongoing training and technical assistance.

While these two LEAs have longstanding noncompliance, each has made overall improvements in its compliance for IDEA Part B Indicator 11. As shown in Figure 11.2, both LEAs are in substantial compliance relative to their IDEA determination (for more information about determinations, please see Indicator 15).

Figure 11.2 – Improvements in Two LEAs with Longstanding Indicator 11 Noncompliance



Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011 (if applicable):

None.

Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: Effective General Supervision Part B / Effective Transition

Indicator 12: Percent of children referred by Part C prior to age 3, who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays.

(20 U.S.C. 1416(a)(3)(B))

Measurement:

- a. # of children who have been served in Part C and referred to Part for Part B eligibility determination.
- b. # of those referred determined to be NOT eligible and whose eligibilities were determined prior to their third birthdays.
- c. # of those found eligible who have an IEP developed and implemented by their third birthdays.
- d. # of children for whom parent refusal to provide consent caused delays in evaluation or initial services or to whom exceptions under 34 CFR §300.301(d) applied.
- e. # of children who were referred to Part C less than 90 days before their third birthdays.

Account for children included in a but not included in b, c, d, or e. Indicate the range of days beyond the third birthday when eligibility was determined and the IEP developed and the reasons for the delays.

Percent = [(c) divided by (a – b – d – e)] times 100.

FFY	Measurable and Rigorous Target
FFY 2010	100% (Not Met with 97%)

Table 12.1 – Actual Target Data for FFY 2010

97%

The Office of Exceptional Children (OEC) collects data from the statewide special education database, Excent ©, for the purposes of IDEA Part B Indicator 12. The date range for this collection was July 1, 2010 – June 30, 2011. These data are reflective of all students who were referred from IDEA Part C Providers (BabyNet) in South Carolina for the respective date range. For each local education agency (LEA) and state-operated program, OEC staff extracted spreadsheet reports in July 2011. A team of OEC staff with expertise in data collection, analyses, and reporting reviewed both quantitative and qualitative data from the Excent spreadsheet reports to determine: a) the categorical analysis of each individual student referred from Part C (a – e in the table below); and b) whether or not student and/or LEA-level noncompliance existed.

Table 12.2 – Actual State Data (In Numbers)

a. # of children who have been served in Part C and referred to Part B for Part B eligibility determination.	2968
b. # of those referred determined to be NOT eligible and whose eligibility was determined prior to third birthday	665
c. # of those found eligible who have an IEP developed and implemented by their third birthdays	1511
d. # for whom parent refusals to provide consent caused delays in evaluation or initial services or to whom exceptions under 34 CFR §300.301(d) applied.	732
e. # of children who were referred to Part C less than 90 days before their third birthdays.	13
# in a but not in b, c, d, or e.	47
Percent of children referred by Part C prior to age 3 who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays Percent = [(c) / (a-b-d-e)] * 100	97%

As shown in Table 12.2, there were 2,967 students who were referred from Part C to Part B for an eligibility determination. This reflects an increase of 570 students from the FFY 2009 report year, and Annual Performance Report (APR). While there were more students referred, there were also fewer students for whom the timeline was not met (forty-seven in FFY 2010 as compared to fifty-two in FFY 2009). As a result, the state has increased its compliance percentage by 0.30 percent.

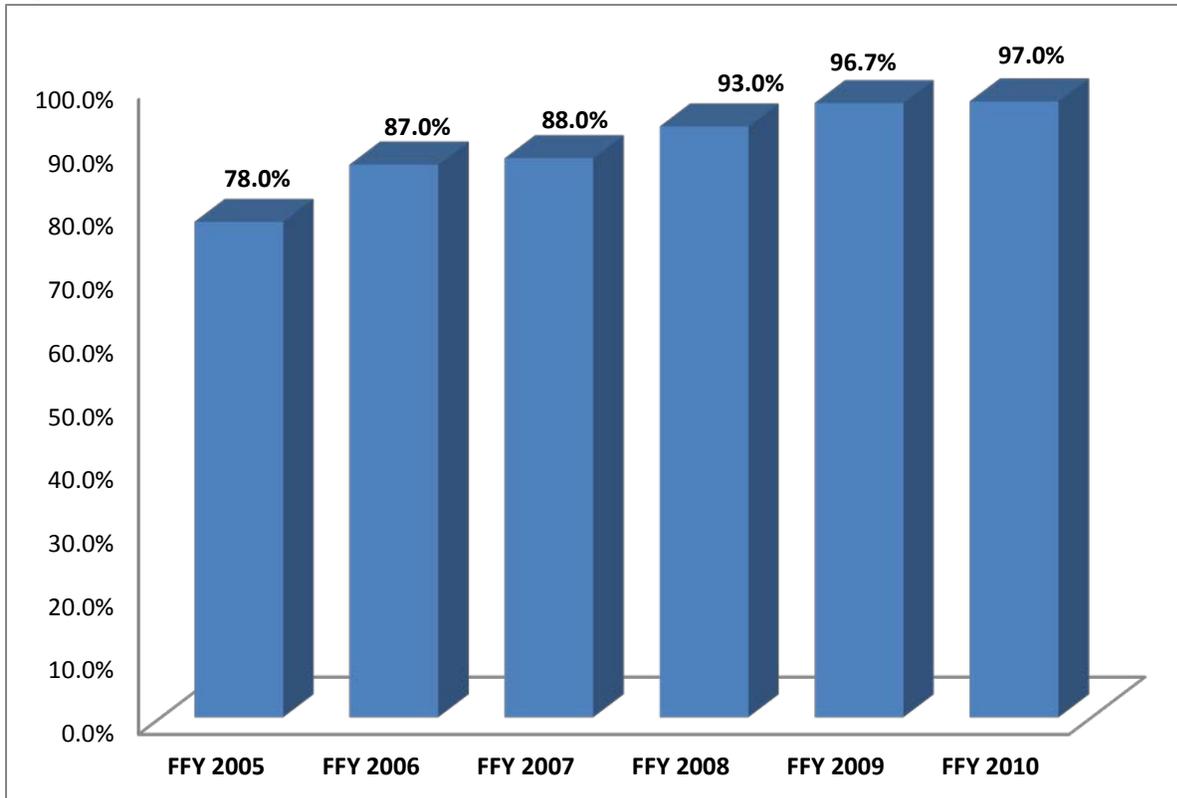
The forty-seven students not accounted for in Table 12.2 (and subsequently in the calculation) are those children for whom noncompliance was found among sixteen LEAs. Reasons for the delays (and subsequent noncompliance) included staff turnover, not ensuring that processes continued during school winter and summer breaks, failure to move expeditiously to ensure that an IEP was developed and implemented timely, continuing to engage parents after multiple attempts and methods were involved (resulting in the referral cases being closed after the third birthday), difficulty with hearing and vision screenings, and for general oversight. The range of days beyond the third birthday of the forty-seven students was from one day to one-hundred sixty-five days, though the one-hundred sixty-five days was an outlier. Average numbers of days beyond the third birthday ranged from one day to fifteen days.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

As shown in Figure 12.1, there has been an increase in the state's compliance to IDEA Part B Indicator 12 over the last six reporting years, reflective of a nineteen percent increase. While the state has not met the required target of 100 percent, the state has increased the number of

children who have been referred from Part C to Part B for an eligibility determination and has decreased the number of students for whom the timeline was not met due to noncompliance to the regulatory requirements on preschool transition.

Figure 12.1 – Indicator 12 from FFY 2005 to FFY 2010



A number of reasons account for the improvements to Indicator 12 and the progress made by the state. First, the OEC conducts preliminary data checks for all LEAs and SOPs to ensure that data are accurate and that any remaining documentation is provided to the OEC. Second, the OEC conducts follow-up technical assistance to ensure the validity of its interpretations of the data from the statewide database when classifying students into the particular categories outlined by the Indicator 12 calculation formula. Third, the OEC has begun conducting onsite monitoring to ensure that LEAs within the state comply with all the related IDEA requirements, including Indicator 12 along with ensuring that noncompliance is corrected as soon as possible but in no case later than one year of notification and consistent with OSEP Memorandum 09-02, dated October 17, 2008. Corrective actions that LEAs must undertake include conducting an IEP team meeting for each eligible student for whom the noncompliance was found to ensure that there were no basic denials of any IDEA rights, including the provision of a free appropriate public education. These corrective actions, including additional corrective actions, enforce the importance to LEA's adherence to Indicator 12 and the related IDEA requirements.

To supplement general supervision activities, the OEC has also provided intensive training related to Indicator 12 to LEA and SOP staff and educators. Regional trainings on the Part C to

Part B transition process were offered in Anderson, Columbia, Spartanburg, Cherokee, Summerville, and Florence, South Carolina during the 2010 – 2011 school year.

On January 28, 2011, OEC staff reviewed the Part C to Part B transition process with new special education directors at the New Directors Leadership Academy. A Part C and Part B joint webinar on transition and data collection was presented on March 10, 2011. On February 5, 2011, at the Family Connections Annual Conference, a presentation was made to parents on what they need to know when their children transition to preschool. At the Research to Practice Institute in Summer 2011, face-to-face assistance for districts special education directors was provided regarding the transition process.

To ensure that the data collected and reported were valid and reliable, OEC staff conducted seven face-to-face regional trainings in which Indicator 12 was discussed at length. Additionally, OEC staff provided all LEAs and state-operated programs in the state with a recorded webinar training module on how to collect and report Indicator 12 data for the educational programs serving preschool children. OEC staff conducted multiple reviews of all LEA's data to ensure that LEA's were reporting accurately. These reviews ensured that children who were referred from Part C to Part B and found eligible for special education and related services had an IEP developed and implemented by the third birthday. A considerable amount of individual technical assistance was held with many LEAs in the state with particular questions regarding Indicator 12.

Correction of FFY 2009 Findings of Noncompliance (if State reported less than 100% compliance in its FFY 2009 APR):

Level of compliance (actual target data) State reported for FFY 2009 for this indicator: 96.7%

1. Number of findings of noncompliance the State made during FFY 2009 (the period from July 1, 2009 through June 30, 2010)	20
2. Number of FFY 2009 findings the State verified as timely corrected (corrected within one year from the date of notification to the LEA of the finding)	19
3. Number of FFY 2009 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	1

4. Number of FFY 2009 findings not timely corrected (same as the number from (3) above)	1
5. Number of FFY 2009 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”)	1
6. Number of FFY 2009 findings <u>not</u> verified as corrected [(4) minus (5)]	0

Verification of Correction (either timely or subsequent):

To verify correction of the noncompliance identified in the database review of Indicator 12, the OEC required that each individual case of noncompliance be corrected as soon as possible, but in no case later than one-year of the notification of the finding of noncompliance. For Indicator 12, this indicated that LEAs had to ensure that any eligible child had an IEP developed and implemented, though after the third birthday and that there were no basic denials of an IDEA right, consistent with OSEP Memorandum 09-02, dated October 17, 2008. In addition, the OEC conducted subsequent (i.e., more recent) reviews of the database from each of the twenty LEAs with noncompliance to ensure that they were correctly implementing the regulatory requirements. Through this verification process, the OEC determined that, based upon a review of more recent, updated data, nineteen LEAs demonstrated compliance to the related requirements of Indicator 12 within the one-year timeline, and one LEA demonstrated compliance three months beyond the one-year timeline.

Describe of the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2009:

LEAs with noncompliance were issued letters of findings following the extraction, analysis, and review of the data from the statewide database (Excent©). The OEC conducted follow-up technical assistance with any LEAs to ensure that both qualitative and quantitative data were accurate and reliable. Once the dataset was determined to be valid and reliable, OEC staff reviewed all information for all children who were referred from Part C to Part B. Based upon that review, the OEC determined noncompliance for five LEAs. The OEC issued letters of finding to the five affected LEAs.

In the letters of finding, LEAs with noncompliance were required to:

1. Ensure that they had developed and implemented the IEP, although late, for any child for whom implementation of the IEP was not timely, unless the child was no longer within the jurisdiction of the LEA, consistent with OSEP Memo 09-02, and submit such documentation to the OEC for review, and
2. Ensure that data were kept up-to-date and participate in quarterly reviews of more recent updated data to ensure it was correctly implementing 34 CFR §300.124(b), (i.e., achieved 100% compliance).
3. Complete a corrective action plan identifying and addressing the root causes of the noncompliance, submit the plan to the OEC for review and approval, and complete the activities outlined therein.

The OEC received the documentation outlined above and verified that nineteen of the affected twenty LEAs were correctly implementing the requirements found at 34 CFR §300.124(b) within one-year, and one was correctly implementing the requirements three months beyond the one-year timeline.

It is important to note that during FFY 2010, the OEC revised its general supervision system to address and monitor the timely correction of noncompliance, as described in the OSEP

Response Table. For more information about the state's current comprehensive general supervision system, please see Indicator 15.

1. Number of remaining FFY 2007 findings noted in OSEP's June 2010 FFY 2009 APR response table for this indicator	3
2. Number of remaining FFY 2007 findings the State has verified as corrected	3
3. Number of remaining FFY 2007 findings the State has NOT verified as corrected [(1) minus (2)]	0

Verification of Correction of Remaining FFY 2007 findings:

To verify correction of the continued, longstanding noncompliance identified in the database review of Indicator 12 from previous reporting years, the OEC required that each individual case of noncompliance be corrected as soon as possible, due to having longstanding noncompliance. For Indicator 12, the LEA had to ensure that any eligible child had an IEP developed and implemented, though after the third birthday and that there were no basic denials of an IDEA right, consistent with OSEP Memorandum 09-02, dated October 17, 2008. In addition, the OEC conducted ongoing reviews of the database from each of the three LEA's with noncompliance to ensure that they were correctly implementing the regulatory requirements. Through this verification process, the OEC determined that, based upon a review of more recent, updated data, the three LEA demonstrated compliance to the related requirements of Indicator 12 and subsequently the longstanding noncompliance was closed.

Describe of the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2007:

LEAs with continued noncompliance were issued notifications following the extraction, analysis, and review of the data from the statewide database (Excent©). The OEC conducted follow-up technical assistance with any LEAs to ensure that both qualitative and quantitative data were accurate and reliable. Once the dataset was determined to be valid and reliable, OEC staff reviewed all information for all children who were referred from Part C to Part B. Based upon that review, the OEC determined noncompliance for the three LEAs.

In the notification letters, LEAs with continued noncompliance were required to:

1. Ensure that they had developed and implemented the IEP, although late, for any child for whom implementation of the IEP was not timely, unless the child is no longer within the jurisdiction of the LEA, consistent with OSEP Memo 09-02, and submit such documentation to the OEC for review, and
2. Ensure that data were kept up-to-date and participate in quarterly reviews of more recent updated data to ensure it was correctly implementing 34 CFR §300.124(b), (i.e., achieved 100% compliance).

3. Revise their corrective action plan identifying and addressing the root causes of the noncompliance, submit the plan to the OEC for review and approval, and complete the activities outlined therein.

The OEC received the documentation outlined above and verified that each of the three LEAs were correctly implementing the requirements found at 34 CFR §300.124(b).

It is important to note that during FFY 2010, the OEC revised its general supervision system to address and monitor the timely correction of noncompliance, as described in the OSEP Response Table.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011:

None.

Part B State Annual Performance Report (APR) for 2010

Monitoring Priority: Effective General Supervision Part B / Effective Transition

Indicator 13: Percent of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student’s transition services needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority.

(20 U.S.C. 1416(a)(3)(B))

Measurement: Percent = [(# of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student’s transition services needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority) divided by the (# of youth with an IEP age 16 and above)] times 100.

FFY	Measurable and Rigorous Target
2010	100% (NOT MET with 96.72%)

Table 13.1 – Actual Target Data for Indicator 13 for FFY 2010

Data for FFY 2010	
Number of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student’s transition services needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a	3,042

representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority.	
Number of youth with an IEP age 16 and above included in the state monitoring plan	3,145
FFY 2010 Percentage Achieved	96.72%

As outlined in the South Carolina State Performance Plan (SPP), the South Carolina Department of Education has a comprehensive plan to ensure that students with Individual Education Programs (IEPs) have measurable post-secondary IEPs and services as outlined in Indicator 13. To ensure this, the state's monitoring plan is a three-fold review of IEPs:

1. LEA-reported self-assessments for each student with an IEP, aged sixteen and above;
2. Peer review sessions in which a subset of IEPs are reviewed for compliance to Indicator 13, and
3. A process for LEAs to appeal the rating given to any IEP during the peer review process.

As shown in Table 13.1, under the general supervision of the Office of Exceptional Children (OEC), 3,145 IEPs were selected as a subset of the 19,107 IEPs reported on the LEA self-assessments. Through the process of the state's review and verification of the subset of 3,145 IEPs, the OEC found that 3,042 IEPs were compliant to Indicator 13, using the checklist developed by National Secondary Transition Technical Assistance Center (NSTTAC).

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2010:

In the SPP and Annual Performance Report (APR) submitted February 1, 2011, the state reported baseline data of 98.92 percent compliance to Indicator 13, or 3,112 compliant IEPs out of a subset of 3,145 IEPs reviewed. For FFY 2010, the state decreased by roughly 2 percent, and reviewed nearly the exact same number as FFY 2009. The two most significant causes of the noncompliance dealt with inappropriately stated postsecondary transition goals and annual goals that did not support postsecondary goals. The OEC continues to work closely with LEAs in providing training and technical assistance.

In addition, the state added a feature to its monitoring for Indicator 13 compliance based upon feedback given in Summer 2011 from the Office of Special Education Programs (OSEP) to ensure the state follows the intent of OSEP Memorandum 09-02, dated October 17, 2008. As a result, the state issued findings of noncompliance to 33 LEAs. The state has ensured that each of the 103 IEPs found noncompliant have been corrected, consistent with OSEP Memo 09-02. The state now conducts reviews of more recent, updated IEPs to verify the systemic correction of noncompliance.

Beginning in November of 2010, regional training sessions were held throughout the state for Indicator 13. Training sessions were conducted by members of the OEC who had received intensive training from the NSTTAC. Sessions provided by the OEC included step-by-step

instructions on how to review IEPs using the NSTTAC Checklist Form A with emphasis on where to locate the information on South Carolina's Individualized Education Programs (IEPs), inter-rater reliability exercises, and question/answer time for issues. Results of the sessions were discussed with participants in an effort to improve inter-rater reliability and participants' knowledge of the indicator. Professional development opportunities were also conducted during the summer Research to Practice Institute sponsored by the SCDE. Participants were taught how to use the NSTTAC checklist in reviewing IEPs in local settings and in training teachers to write compliant IEPs. The NSTTAC materials and checklists were developed to assist states in collecting data to meet Indicator 13 of the Part B State Performance Plan and Annual Performance Report, and were approved for this purpose by OSEP on September 8, 2006.

In addition to the statewide sessions, regional representatives within the OEC provided more intense technical assistance for the Indicator 13 as requested by local education agencies (LEAs) throughout the state. This included reviews of the checklist with LEA special education directors, teachers, and other school staff members as well as mock reviews in order to improve reliability.

The OEC will continue to provide training on writing appropriate post-secondary IEPs as well as training on how to appropriately monitor compliance to Indicator 13 and use the NSTTAC checklists.

In October 2010, the OEC was awarded a State Personnel Development Grant (SPDG) which includes an emphasis on secondary transition. Activities include creating a professional learning community on secondary transition, providing onsite coaching by a secondary transition coach, offering graduate level courses in the area of transition, and identifying LEAs with model transition programs. A grant director, transition coach, and preschool coach have been hired to begin facilitation of the grant. Schools meeting the criteria for level one have been identified and contacts have been made to establish the protocol for participation in the grant at that level. LEAs have been notified of the process for making application to participate at levels two and three. Applications came into the OEC on December 5, 2011. These will be reviewed by the Grant Steering Committee and selections made based on the criteria established in the grant. Three school level coaches will be hired in the spring of 2012 to begin work in the fall of 2012 with the level one schools identified for the project.

Correction of FFY 2009 Findings of Noncompliance (if State reported less than 100% compliance in its FFY 2009 APR):

Level of compliance (actual target data) State reported for FFY 2009 for this indicator: 98.92%

1. Number of findings of noncompliance the State made during FFY 2009 (the period from July 1, 2009 through June 30, 2010)	14
2. Number of FFY 2009 findings the State verified as timely corrected (corrected within one year from the date of notification to the LEA of the finding)	14
3. Number of FFY 2009 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Verification of Correction (either timely or subsequent):

To verify correction of the noncompliance identified in the statewide monitoring of Indicator 13, the OEC required that each individual case of noncompliance be corrected as soon as possible, but in no case later than one-year of the notification of the finding of noncompliance. For Indicator 13, LEA's had to ensure that any eligible child had appropriate postsecondary goals and transitions services, as outlined by Indicator 13, and that there were no basic denials of an IDEA right, consistent with OSEP Memorandum 09-02, dated October 17, 2008. In addition, the OEC conducted subsequent (i.e., more recent) reviews of the database from each of the fourteen LEA's with noncompliance to ensure that they were correctly implementing the regulatory requirements. Through this verification process, the OEC determined that, based upon a review of more recent, updated data, all of the LEAs demonstrated compliance to the related requirements of Indicator 13 within the one-year timeline.

Describe of the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2009:

LEAs with noncompliance were issued letters of findings following the extraction, analysis, and review of the data from statewide monitoring. The OEC conducted follow-up technical assistance with LEAs to ensure that both qualitative and quantitative data were accurate and reliable. The OEC determined noncompliance for fourteen LEAs consistent with the state's monitoring plan. The OEC issued letters of finding to fourteen affected LEAs.

In the letters of finding, LEAs with noncompliance were required to:

1. Ensure that they had developed appropriate postsecondary transition goals and IEPs, including transition services for each individual case of noncompliance, unless the child was no longer within the jurisdiction of the LEA, consistent with OSEP Memo 09-02, and submit such documentation to the OEC for review, and
2. Ensure that data were kept up-to-date and participate in quarterly reviews of more recent updated data to ensure it was correctly implementing 34 CFR §300.124(b), (i.e., achieved 100% compliance).
3. Complete a corrective action plan identifying and addressing the root causes of the noncompliance, submit the plan to the OEC for review and approval, and complete the activities outlined therein.

The OEC received the documentation outlined above and verified that all of the affected LEAs were correctly implementing the requirements found at 34 CFR §300.124(b) within one-year timeline. It is important to note that during FFY 2010, the OEC revised its general supervision system to address and monitor the timely correction of noncompliance, as described in the OSEP Response Table.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011:

None.

Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: Effective General Supervision Part B / Effective Transition

Indicator 14: Percent of youth who are no longer in secondary school, had IEPs in effect at the time they left school, and were:

- A. Enrolled in higher education within one year of leaving high school.
- B. Enrolled in higher education or competitively employed within one year of leaving high school.
- C. Enrolled in higher education or in some other postsecondary education or training program; or competitively employed or in some other employment within one year of leaving high school.

(20 U.S.C. 1416(a)(3)(B))

Measurement:

A. Percent enrolled in higher education = [(# of youth who are no longer in secondary school, had IEPs in effect at the time they left school and were enrolled in higher education within one year of leaving high school) divided by the (# of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school)] times 100.

B. Percent enrolled in higher education or competitively employed within one year of leaving high school = [(# of youth who are no longer in secondary school, had IEPs in effect at the time they left school and were enrolled in higher education or competitively employed within one year of leaving high school) divided by the (# of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school)] times 100.

C. Percent enrolled in higher education, or in some other postsecondary education or training program; or competitively employed or in some other employment = [(# of youth who are no longer in secondary school, had IEPs in effect at the time they left school and were enrolled in higher education, or in some other postsecondary education or training program; or competitively employed or in some other employment) divided by the (# of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school)] times 100.

FFY	Measurable and Rigorous Target
2010	<i>A. Percent enrolled in higher education will be 24.36% Met</i>
	<i>B. Percent enrolled in higher education or competitively employed within one year of leaving high school will be 50.23% Met</i>
	<i>C. Percent enrolled in higher education, or in some other postsecondary education or training program; or competitively employed or in some other employment within one year of leaving high school will be 65.92% Met</i>

Table 14.1 – Actual Target Data for FFY 2010

FFY	Measurable and Rigorous Target
2010	A. Percent enrolled in higher education was 29.70% .
	B. Percent enrolled in higher education or competitively employed within one year of leaving high school was 53.81% .
	C. Percent enrolled in higher education, or in some other postsecondary education or training program; or competitively employed or in some other employment within one year of leaving high school was 66.88% .

South Carolina contracts with Lifetrack Services, Inc. (Lifetrack) to conduct a census of school exiters each year to follow-up on post-secondary experiences. Surveys were distributed in May 2011 and were collected by September 2011. Exiters include students who have aged-out, graduated with a regular high school diploma, are non-returners who received a state certificate or are dropouts at or above age 17. Lifetrack conducts surveys one year after students exit school with a survey on postsecondary experiences.

Exiters are identified through South Carolina's online special education student information system, Excent. These students have been verified as having exited with the 618 Table 4 submission. In order to ensure valid data are provided for exiting students, the OEC follows-up with each LEA to ensure up-to-date contact information for students when they graduate, receive a state certificate, drop out of school, or die. For the post-secondary survey, South Carolina provides Lifetrack with the population of exiters from the previous school year.

Lifetrack sends letters with postage paid return envelopes to the indicated population and contacts non-responders by telephone. They then compile the data and send the state a compilation report for analysis. In order to appropriately identify students for the particular categories of this indicator, OEC staff conducts additional analyses to ensure that students are correctly counted once in one of four conditions:

1. enrolled in higher education,
2. competitively employed,
3. enrolled in some other postsecondary education or training program, or
4. employed in some other employment.

Higher education as used in measures A, B, and C means youth who have been enrolled on a full- or part-time basis in a community or technical college (2-year program) or college/university (4- or more year program) for at least one complete term, at any time in the year since leaving high school.

Competitively employed as used in measures B and C means youth who have worked for pay at or above the minimum wage in a setting with others who are nondisabled for a period of twenty hours per week for at least 90 total days at any time in the year since leaving high school, which includes military employment.

Other postsecondary education or training as used in measure C means youth who have been enrolled on a full- or part-time basis for at least 1 complete term at any time in the year since leaving high school in an education or training program, which could include JobCorps, adult education, workforce development programs, on-the-job training, vocational educational programs which are less than two-years, and certificate programs (less than a two-year program).

Other Employment as used in measure C means youth who have worked for pay or been self-employed for a period of at least 90 total days at any time in the year since leaving high school, including working in a family business.

Exiters are defined as the population of students who have exited school during the previous school year to the reporting year of the SPP/APR for reasons that include:

1. Graduating with a South Carolina high school diploma,
2. Receiving a South Carolina state certificate,
3. Reaching maximum age,
4. Dropping out of school at age 17 and above, and not returning to school the subsequent year

South Carolina notes that while students with disabilities who have died are counted in state reporting of exiters, South Carolina does not include them in the definition of “exiters” for Part B SPP Indicator 14. Subsequently, their families are not provided surveys nor interviewed, and these students are not included in the survey process.

Respondents are defined as youth or their designated family member who answer and return the survey and/or interview questions.

Lifetrack distributed surveys to 7,203 individuals one year after they exited school. Of the 7,203 surveys distributed, 1,576 responded, a 21.88% return rate. While the return rate was lower than the return rate discussed in the State Performance Plan (SPP), submitted February 1, 2011, there was nearly twice the number of surveys distributed and returned compared to the previous year. The data are shown in Table 14.2.

Table 14.2 – Comparison of FFY 2009 Return Rates to FFY 2010 Return Rates

	FFY 2009	FFY 2010
Surveys Distributed	3,570	7,203
Surveys Returned	854	1,576

Calculation Methodology

To calculate the three measurement components of Part B Indicator 14 (A-C), the OEC first calculates the following four exit categories:

1. = The number of respondent exiters enrolled in “higher education.”
2. = The number of respondent exiters in “competitive employment,” and not counted in 1 above.

3. = The number of respondent exiters in “some other postsecondary education or training,” and not counted in 1 or 2 above.
4. = The number of respondent exiters in “some other employment,” and not counted in 1, 2, or 3 above.

To calculate the indicator percentages, South Carolina uses the following calculation:

A = 1 divided by the number of total respondents.

B = 1 + 2 divided by the number of total respondents.

C = 1 + 2 + 3 divided by the number of total respondents.

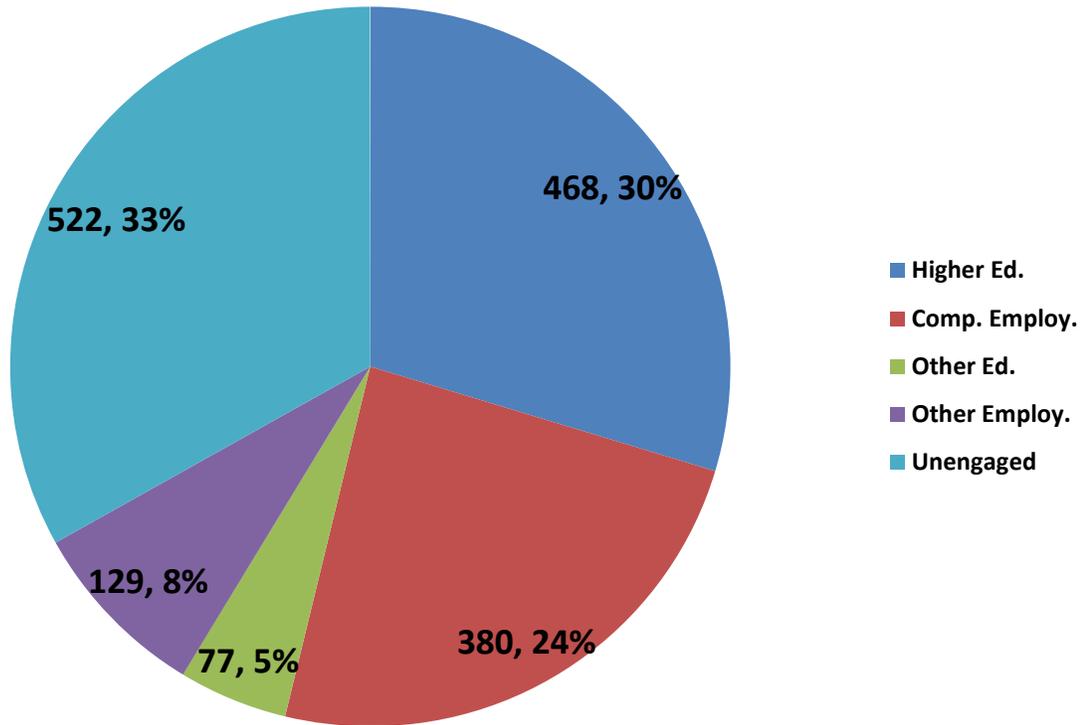
Analyses of the 1,576 respondents’ data reveals similar patterns to the baseline data reported in FFY 2009. As shown in Table 14.2, there was roughly 5 percent more students enrolled in higher education, as defined by Indicator 14, during FFY 2010. In terms of percentages, there were fewer students competitively employed, in some other postsecondary education and unengaged in FFY 2010, as compared to the baseline data reported in FFY 2009.

Table 14.3 – Comparison of Engagement Categories of Exiters, 2010 and 2009

	FFY 2010	FFY 2009	1-Year Change
Higher Education	29.70%	24.36%	5.34%
Competitive Employment	24.11%	25.88%	-1.77%
Other Education	4.89%	8.78%	-3.90%
Other Employment	8.19%	6.91%	1.28%
Unengaged	33.12%	34.07%	-0.95%
Grand Total	100.00%	100.00%	0.00%

As shown in Figure 14.1, approximately 30 percent of students are in higher education and nearly 25 percent are competitively employed. A further 13 percent are engaged in some other postsecondary education or employment, leaving nearly one-third as unengaged. It is important to note that un-engagement is not indicative that students are not working or in some postsecondary educational program. Some of the respondents indicated they had re-enrolled in high school, while others did not answer enough items to be clearly reported on the engagement categories. Others reported they were in some kind of postsecondary education or employment, but had not completed one full term of postsecondary education or had not worked at least 90-days in their job. As a result, those respondents would not be captured in one of the categories because they failed to meet the state and federal definitions of the particular engagement categories.

Figure 14.1 - 2010 Engagement by Category



With the dataset, the only reported demographic characteristics were race/ethnicity and gender. As a result, the Office of Exceptional Children disaggregated the engagement categories by each of the two demographic features available for analyses. As shown in Figure 14.2, comparatively more females are in higher education as compared to males, though more males are competitively employed. About the same proportion of males and females are in some other postsecondary education or employment. Finally females make up a higher proportion of unengaged as compared to males.

Figure 14.2 – Engagement by Category and Gender

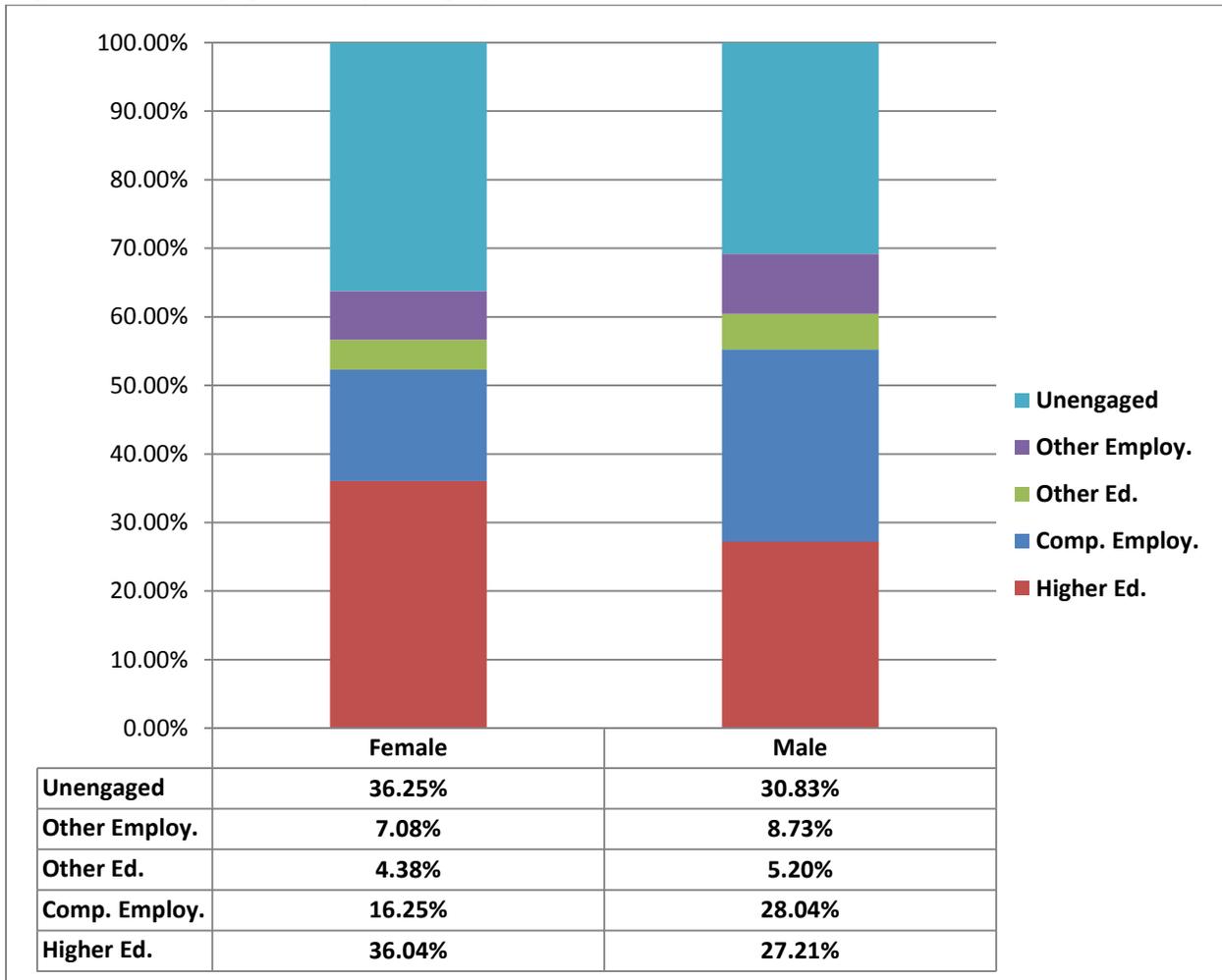
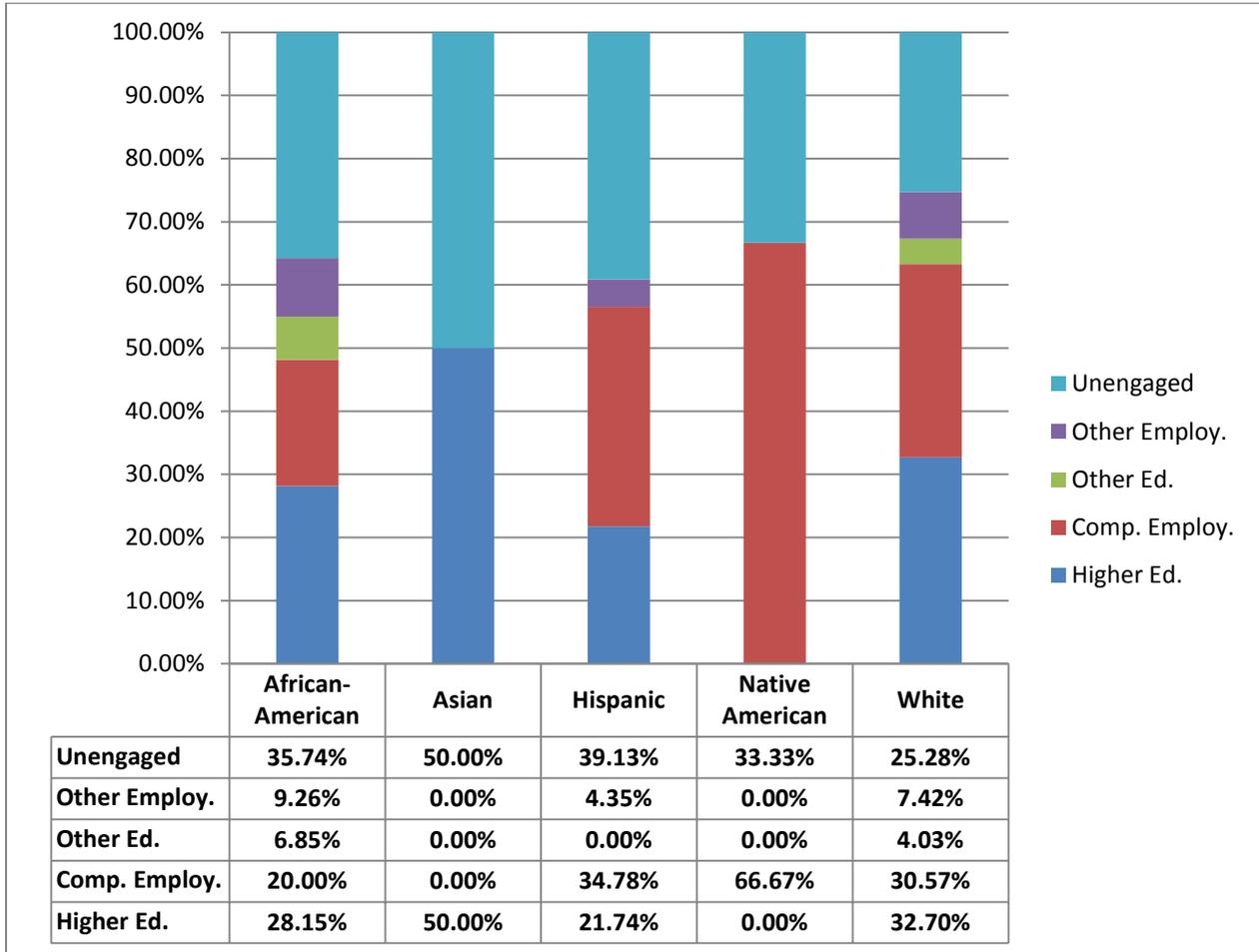


Figure 14.3 displays the breakdown, in percentages, the comparison between engagement category and race/ethnicity. It is important to note that respondents who noted their race/ethnicity as Asian, Native American, or Hispanic number less than twenty-five per category. In proportions, more white students are in higher education and competitive employment whereas more African-Americans are in other education or employment. Proportionally more African-Americans are unengaged, too.

Figure 14.3 – Engagement by Category and Race/Ethnicity



Representativeness

The final analyses applied to the Indicator 14 data involved determining how representative the respondents are to the students who exited school at the end of the 2009 – 2010 school year. As shown in Table 14.4, there is about a 10 percent underrepresentation of African-American respondents and an 11 percent overrepresentation of white respondents. The remaining respondents of the other race/ethnicities are representative of the exiters. It is likewise important to note that two-hundred ten respondents did not mark the item for race/ethnicity on the survey or selected “Other” as an option. As a result, it is likely that these would change the representativeness of the data.

Table 14.4 – Representativeness of Respondents to FFY 2009 Exiters, by Race/Ethnicity

RACE/ETHNICITY	Exiters in Numbers	Percentage	Respondents in Numbers	Percentage	Difference
African-American	3602	50.01%	540	39.53%	-10.48%
American-Indian	19	0.26%	6	0.44%	0.18%
Asian	22	0.31%	2	0.15%	-0.16%
Hispanic	159	2.21%	23	1.68%	-0.52%
White	3392	47.09%	795	58.20%	11.11%
Total	7203	100.00%	1366	100.00%	

Table 14.5 compares respondents to exiters in terms of reported gender to determine whether or not the data are representative. As shown in Table 14.4, there is representativeness of the respondents to the exiters. Only nineteen respondents did not respond to the gender item on the survey.

Table 14.5 – Representativeness of Respondents to FFY 2009 Exiters, by Gender

RACE/ETHNICITY	Exiters in Numbers	Percentage	Respondents in Numbers	Percentage	Difference
Female	2332	32.38%	480	30.83%	-1.55%
Male	4871	67.62%	1077	69.17%	1.55%
Total	7203	100.00%	1557	100.00%	

As a result, the data appear to be fairly representative except for respondents who are African-American. This pattern was evident in the baseline data for Indicator 14, reported in the SPP on February 1, 2011. The state needs to increase activities to ensure that respondents from racial/ethnic minority backgrounds receive and complete the survey on postsecondary outcomes.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

During FFY 2009 and FFY 2010, the Office of Exceptional Children undertook additional marketing activities to inform students and their parents of the postsecondary survey they were likely to receive one-year after leaving school. In particular, OEC staff conducted awareness activities at the Fall and Spring Special Education Administrators Conferences in FFY 2009 and FFY 2010. OEC staff also presented information before the South Carolina Advisory Board on the Education of Students with Disabilities in FFY 2009 and FFY 2010. OEC staff constructed informational brochures and disseminated those to special education directors in all local education agencies with the request of disseminating those at IEP meetings for appropriate students.

While the state exceeded its targets for all three outcome areas for Indicator 14, it would be purely conjecture as to why more students are reportedly in higher education, competitive employment, or some kind of other postsecondary training or employment. One indicator may be the overall improvement in the economic downturn experienced by South Carolina in recent

years. Additionally, the state has made Indicator 13 a primary focus for the past several years, emphasizing the importance of postsecondary transition IEPs and services.

Because of the nature of the survey collection, and the limitations of the interpretations of the survey items, little is specifically known about why students are enrolled in higher education, are competitively employed, or in some other postsecondary transition or employment.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011:

None.

Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: Effective General Supervision Part B / General Supervision

Indicator 15: General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon as possible but in no case later than one year from identification.

(20 U.S.C. 1416 (a)(3)(B))

Measurement:
 Percent of noncompliance corrected within one year of identification:
 a. # of findings of noncompliance.
 b. # of corrections completed as soon as possible but in no case later than one year from identification.
 Percent = [(b) divided by (a)] times 100.
 States are required to use the “Indicator 15 Worksheet” to report data for this indicator (see Attachment A).

FFY	Measureable and Rigorous Target
2010 (2010-2011)	The state’s general supervision system identifies and corrects all (100%) of noncompliance as soon as possible, but in no case later than one year from identification.

Actual Target Data

98.73% of noncompliance identified and corrected all as soon as possible, but in no case later than one year from identification.

General Supervision – Compliance Monitoring

For FFY 2011, the Office of Exceptional Children (OEC) has implemented an onsite compliance monitoring system. The goal of the OEC’s compliance monitoring activities is to ensure that LEAs are meeting the requirements of both federal and state regulations and statutes regarding educational programs for students with disabilities. In alignment with federal regulations, the SCDE’s monitoring approach is outcome oriented. However, if noncompliance is identified through any of OEC’s monitoring activities, the OEC will require the LEA to correct the noncompliance as soon as possible, but in no case later than one year from the date of notification.

Monitoring Activities include:

- **Database Reviews:** The OEC will review data in the Excent Online Database System to identify noncompliance and assess progress toward federal and state targets for special education. Data for SPP/APR indicators will be reviewed periodically throughout the year. LEAs may receive findings of noncompliance identified through database reviews.
- **Onsite Compliance Monitoring:** Annually the OEC will conduct onsite compliance monitoring for a selection of LEAs, based upon both LEA Determinations and a cyclical monitoring plan. Onsite monitoring will include record reviews and interviews to identify noncompliance and assess progress toward federal and state targets for special education. For more information, please see Appendix B. Record reviews entail an examination of student Individualized Education Programs (IEPs), financial and accounting records, or any other records that may contain information necessary for federal, state, or local reporting. The majority of record reviews conducted by the OEC will occur through database reviews, onsite compliance monitoring and required audit activities. Interviews entail gleaning important information from district and school administrators, staff, parents, and as appropriate, students with disabilities.
- **LEA Self-Assessments:** The LEA self-assessment is a process by which LEAs assess their own performance and progress toward compliance with IDEA Part B. The self-assessment is designed to guide LEAs through a collaborative analysis and planning process to engage stakeholders in developing targeted improvement activities in the areas that the LEA is most in need and deemed necessary. This process should be used in conjunction with completing any PICO-r, tailored to the specific area of noncompliance. In addition, LEAs may be required to complete additional self-assessments to ensure their policies, procedures, and practices comply with specific requirements as outlined in IDEA Part B Indicators 4A, 4B, 9 and 10.

Onsite compliance monitoring is a process by which selected LEAs receive an onsite visit by OEC staff for a comprehensive record review and stakeholder interviews. The process is designed to identify noncompliance and assess LEA progress toward improving educational results and functional outcomes for all students with disabilities. Onsite compliance monitoring also allows the SCDE to determine if the LEA's implemented strategies have resulted in qualitative and quantitative improvements, and to formulate specific, tailored actions if improved outcomes have not been achieved.

Identification of LEAs for Onsite Compliance Monitoring

LEAs will be selected for an onsite compliance monitoring events based on the consideration and evaluation of three factors:

- LEA Determinations (targeted LEAs with poor determinations)
- Cyclical Monitoring (annual stratified, representative random selection of LEAs)
- Other issues needing verification (specific LEAs as identified)

Notification of Onsite Compliance Monitoring

LEA superintendents and special education directors will be notified by letter and electronic mail of the scheduled monitoring event. The OEC will also facilitate a scheduled telephone call(s), or face-to-face or virtual meeting(s), to discuss the onsite monitoring event. The first call or meeting will occur at the beginning of the year the LEA is to be monitored. The second call or meeting will occur thirty-days prior to the onsite event. With the notification letter, the LEA will be informed of the specific timelines and due dates for materials.

Preparation

LEAs are expected to plan as soon as possible for the onsite monitoring event. LEAs should begin collecting documents needed prior to the onsite monitoring event, and for the event itself. LEAs should plan for the logistics, accommodations and time needed for staff, family and student interviews and for OEC record reviews.

Preparation is an opportunity for the LEA and SCDE to discuss the purpose of the onsite event, confer about the agenda for the onsite event, agree on logistics and review LEA data. It is also an occasion for the LEA to ask any questions regarding the monitoring event and for the LEA to provide the SCDE with documents needed prior to the event.

Documentation is required from districts prior to the onsite visit. The “Pre-Site Documentation” includes all of the following:

- List of teachers that include their assigned school, program model, and categories of disability,
- Sample Prior Written Notice (PWN) form,
- LEA handbook including discipline procedures,
- Documentation of implementation of child find procedures,
- A copy of the LEA’s parent handbook or listing of parental rights (whatever is used as the full explanation of parental rights),
- Confidentiality/Records access procedures,
- LEA Special Education Policies and Procedures, if exists, including
 - Sample surrogate parent procedures
 - Discipline procedures
 - Procedures for transition from BabyNet to preschool

Onsite Compliance Monitoring Event

Following the notification letter to each selected LEA and the subsequent pre-site documentation review, the OEC will conduct an onsite event with the LEA. The onsite event is designed to verify that the LEA’s special education program and services are compliant with federal and state regulations. During the onsite monitoring event, the OEC will complete three primary tasks – record reviews, staff interviews, and student and family interviews. The following chart displays information regarding each of these three monitoring components.

<i>Monitoring Component</i>	<i>Data/Information/Participants Needed</i>
Record Reviews:	<ul style="list-style-type: none"> • Student files (pre-selected) • Student information included in Excent/PowerSchool
Staff Interviews:	<ul style="list-style-type: none"> • Administrators • Special education coordinator(s) • Special education teachers • General education teachers • Related service providers
Student and Family Interviews:	<ul style="list-style-type: none"> • Parents • Students at middle and high school(s) • Students at elementary school(s) (optional)

Letter of Findings and Monitoring Report

Thirty business days following the onsite event, the OEC will notify the LEA of any findings of noncompliance identified during the onsite monitoring event. Attached to the Letter of Findings will be a detailed Monitoring Report that will specifically outline student and LEA level noncompliance. The Monitoring Report will also delineate student and LEA level corrective actions necessary to correct identified noncompliance.

For all identified noncompliance, LEAs must correct the noncompliance as soon as possible but in no case later than one year. The date of the Letter of Findings serves as the date of the identification of the noncompliance.

Pursuant to OSEP Memorandum 09-02 dated October 17, 2008 (OSEP Memo 09-02), the SCDE must account for all instances of noncompliance. In determining the steps that the LEA must take to correct the noncompliance and document such correction, the SCDE may consider a variety of factors. For any noncompliance concerning a child-specific requirement that is not subject to a specific timeline requirement, the OEC must ensure that the LEA has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the LEA. In addition, the OEC must ensure that each LEA has completed the required action [e.g. completed an evaluation (although late)]. A copy of the OSEP Memo 09-02 can be found on the OEC website.

Development/Revision of the PICO

The SCDE is committed to providing technical assistance to LEAs as they formulate Plans for Improving Children's Outcomes (PICOs) and/or as they complete corrective actions. Assistance from OEC staff will be available to LEAs as they strive toward correction of

noncompliance and improvement of educational results and functional outcomes for students with disabilities. An LEA with any finding(s) of noncompliance would have one PICO that addresses each finding, and the actions it must take to correct the noncompliance and ensure that it is correctly implementing the regulatory requirements related to educational programs for students with disabilities. The PICO should be viewed as a living document that is amended as findings are closed and/or new findings are issued.

The PICO must be developed and submitted within twenty business days of the Letter of Finding and Monitoring Report. The PICO must be submitted to the OEC for review and approval, and must be monitored accordingly to ensure that the LEA completes any correction action requirements and activities.

Verification of Correction of Noncompliance

Each case of student-level noncompliance must be corrected by the LEA and each student file found noncompliant must document the corrective action outlined. The Monitoring Report will detail the required corrective actions. LEA-level noncompliance is corrected when the LEA can demonstrate that it is correctly implementing the specific regulatory requirement with all students with disabilities. The Monitoring Report will also detail the LEA-level corrective actions required to correct noncompliance.

After the LEA has corrected the student-level and LEA-level noncompliance, the OEC will verify the correction of noncompliance. For student-level noncompliance, the OEC may review all student files found to be noncompliant or may select a sample of the original student files reviewed to verify the correction of the noncompliance. For LEA-level noncompliance, the OEC will review additional updated files to verify that the LEA is correctly implementing the requirements or the regulations for both the student-level and LEA-level noncompliance found. If during verification activities the OEC finds additional noncompliance, the LEA will be required to correct the continued noncompliance as soon as possible but in no case later than one year after the identification of the noncompliance. The SCDE must verify the correction of noncompliance within one year of the identification of the noncompliance, therefore verification activities will occur before the conclusion of the one-year timeline.

Closure of Findings of Noncompliance

After the SCDC has verified the correction of the noncompliance, the OEC will inform the LEA in writing that the finding(s) of noncompliance are closed. LEAs should continue to conduct record review activities to identify any areas of need that may arise before future OEC monitoring activities. Longstanding noncompliance extending beyond the one-year correction period will result in additional enforcement actions by the OEC and will affect the LEA's annual determination. Likewise, the LEA's timely correction of noncompliance will also be considered in the LEA's annual determination.

Discussion of Data

The OEC has revised its Indicator 15 with the FFY 2010 submission of the State Performance Plan (SPP) and Annual Performance Report (APR) as its policies and procedures for general supervision were revised in FFY 2010 (addition of onsite monitoring). The calculation methodology has not changed. As shown in Table 15.1, the data for Indicator 15 is 98.73 percent. This reflects a 6.71 percent increase from those data reported in the FFY 2009 APR, submitted February 1, 2011. While the state did not meet the target compliance rate of 100 percent, the state has nonetheless made considerable strides in improving both its system of general supervision and its ability to issue and monitoring findings to ensure that all findings are corrected as soon as possible, but in no case later than one-year from identification, and consistent with OSEP Memorandum 09-02, dated October 17, 2008.

Table 15.2 – Indicator 15 Data from FFY 2009 Findings

Indicator/Indicator Clusters	General Supervision System Components	# of LEAs Issued Findings in FFY 2009 (7/1/09 to 6/30/10)	(a) # of Findings of noncompliance identified in FFY 2009 (7/1/09 to 6/30/10)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
1. Percent of youth with IEPs graduating from high school with a regular diploma. 2. Percent of youth with IEPs dropping out of high school.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
14. Percent of youth who had IEPs, are no longer in secondary school and who have been competitively employed, enrolled in some type of postsecondary school or training program, or both, within one year of leaving high school.	Dispute Resolution: Complaints, Hearings	0	0	0
3. Participation and performance of children with disabilities on statewide assessments.	Monitoring Activities: Self-Assessment/	0	0	0

<p>7. Percent of preschool children with IEPs who demonstrated improved outcomes.</p>	<p>Local APR, Data Review, Desk Audit, On-Site Visits, or Other</p>			
	<p>Dispute Resolution: Complaints, Hearings</p>	<p>0</p>	<p>0</p>	<p>0</p>
<p>4A. Percent of districts identified as having a significant discrepancy in the rates of suspensions and expulsions of children with disabilities for greater than 10 days in a school year.</p>	<p>Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other</p>	<p>3</p>	<p>3</p>	<p>3</p>
<p>4B. Percent of districts that have: (a) a significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.</p>	<p>Dispute Resolution: Complaints, Hearings</p>	<p>0</p>	<p>0</p>	<p>0</p>
<p>5. Percent of children with IEPs aged 6 through 21 -educational placements.</p>	<p>Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits,</p>	<p>0</p>	<p>0</p>	<p>0</p>
<p>6. Percent of preschool children aged 3 through 5 – early childhood</p>				

placement.	or Other			
8. Percent of parents with a child receiving special education services who report that schools facilitated parent involvement as a means of improving services and results for children with disabilities.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	12	12	12
9. Percent of districts with disproportionate representation of racial and ethnic groups in special education that is the result of inappropriate identification.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	4	4	3
10. Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification.	Dispute Resolution: Complaints, Hearings	0	0	0
11. Percent of children who were evaluated within 60 days of receiving parental consent for initial evaluation or, if the State establishes a timeframe within which the evaluation must be conducted, within that	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	46	46	46

timeframe.	Dispute Resolution: Complaints, Hearings	3	5	5
12. Percent of children referred by Part C prior to age 3, who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	20	20	19
	Dispute Resolution: Complaints, Hearings	0	0	0
13. Percent of youth aged 16 and above with IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition service needs.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	14	14	14
	Dispute Resolution: Complaints, Hearings	1	2	2
Other areas of noncompliance: IEP Implementation	Monitoring Activities: Self-Assessment/ Local APR, Data Review,	0	0	0

	Desk Audit, On-Site Visits, or Other			
	Dispute Resolution: Complaints, Hearings	11	24	24
Other areas of noncompliance: IEP Procedures	Monitoring Activities: Self- Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	5	14	14
Other areas of noncompliance: Discipline	Monitoring Activities: Self- Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	5	13	13
Sum the numbers down Column a and Column b			157	155
Percent of noncompliance corrected within one year of identification =			= (b) / (a) X 100	98.73%
(column (b) sum divided by column (a) sum) times 100.				

As shown in Figure 15.2, the state has made considerable progress in its compliance to IDEA Part B Indicator 15 over the past five report years. From FFY 2006 (2006 – 2007 report year), the state has increased over 28 percent in its compliance to ensuring that findings of noncompliance are corrected as soon as possible, but in no case later than one-year from notification.

Figure 15.1



The primary reasons for these improvements lie in the revised general supervision activities undertaken by the Office of Exceptional Children to ensure compliance is monitored effectively, and to ensure that LEAs correct any noncompliance timely. The second reason for these improvements lie in LEAs understanding the significance of all noncompliance, including noncompliance identified through the state’s database system, and thoroughly ensuring that noncompliance is corrected in a timely manner.

Timely Correction of FFY 2009 Findings of Noncompliance (corrected within one year from identification of the noncompliance):

1. Number of findings of noncompliance the State identified in FFY 2009 (the period from July 1, 2009 through June 30, 2010) (Sum of Column a on the Indicator B15 Worksheet)	157
2. Number of findings the State verified as timely corrected (corrected within one year from the date of notification to the LEA of the finding) (Sum of Column b on the Indicator B15 Worksheet)	155
3. Number of findings <u>not</u> verified as corrected within one year [(1) minus (2)]	2

FFY 2009 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance and/or Not Corrected):

4. Number of FFY 2009 findings not timely corrected (same as the number from (3) above)	2
5. Number of FFY 2009 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”)	1
6. Number of FFY 2009 findings <u>not</u> yet verified as corrected [(4) minus (5)]	1

Verification of Correction for findings of noncompliance identified in FFY 2009 (either timely or subsequent):

Between July 1, 2009 and June 30, 2010, the South Carolina Department of Education issued 157 findings of noncompliance to the federal regulations and statutes governing educational programs for students with disabilities. Of the 157 findings issued, the OEC verified that 155 were corrected within the one-year timeline, and consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02). Of the two remaining findings of noncompliance, the OEC verified that one was corrected, though beyond the one-year timeline and consistent with OSEP Memo 09-02. For additional details, please refer to Indicators 4A, 4B, 10, 11, 12 and 13.

Actions Taken if Noncompliance Not Corrected

The state has verified that all but one finding of noncompliance issued in FFY 2009 have been corrected, consistent with OSEP Memo 09-02. The remaining finding of noncompliance not corrected is related to IDEA Part B Indicator 10. For specific details regarding the actions taken for the LEA with longstanding noncompliance to Indicator 10, please see Indicator 10 in this APR.

Correction of Remaining FFY 2007 and FFY 2008 Findings of Noncompliance (if applicable)

1. Number of remaining FFY 2007 and FFY 2008 findings noted in OSEP’s FFY 2009 APR response table for this indicator	10
2. Number of remaining FFY 2007 and FFY 2008 findings the State has verified as corrected	8
3. Number of remaining FFY 2007 and FFY 2008 findings the State has NOT verified as corrected [(1) minus (2)]	2

The state has verified that all but two findings of noncompliance issued in FFY 2007 and FFY 2008 have been corrected, consistent with OSEP Memo 09-02. The remaining two findings of noncompliance not corrected are related to IDEA Part B Indicator 11. For specific details regarding the actions taken for the two LEAs with longstanding noncompliance to Indicator 11, please see Indicator 11 in this APR.

Currently, there is only one case from the 2008–09 school year (FFY 2008) where corrective actions were not completed within the one-year timeline, though as of this APR, the state, under guidance from the OSEP, considers the complaint to be corrected, though the LEA in question continues to provide the compensatory services as required. On May 13, 2008, a letter of resolution was issued to an LEA. The SCDE determined after an analysis of all documentation provided by the LEA that the student was owed special education services in the amount of 527 hours of applied behavior analysis (ABA) line therapy and 713 hours of ABA lead therapy.

The SCDE worked diligently with the District and the Complainant to bring closure to the corrective actions by May 13, 2009. Due to the amount of the compensatory services owed to the Student; the significant amount of special education and related services included in the Student’s individualized education program (IEP) for the summer of 2008 and the 2008–09 school year, which included 50 hours per week of one-on-one ABA therapy hours; and the Complainant’s unwillingness to make the Student available for the delivery of compensatory services, one calendar year did not provide a sufficient amount of time to complete the corrective actions. From the time period of May 2008, to date, the District provided the Student 525 hours of lead ABA therapy and 145 hours of line ABA therapy. As of January 13, 2012, the student has approximately 156 hours of lead therapy and 382 hours of line therapy remaining to complete the corrective actions. The LEA continues provide the ABA compensatory services. As a result of the amount of corrective action, and with guidance from the OSEP, the SCDE considers this finding to be closed.

Improvement Activities/Timelines/Resources:

Improvement Activities	Timelines	Resources
Conduct on-site verification/monitoring visits	FFY 2010 through 2013	<ul style="list-style-type: none"> • OEC Regional Representatives • OEC Monitors • OEC Coordinator
Increase frequency of data pulls for LEAs with continued noncompliance	FFY 2010 through 2013	<ul style="list-style-type: none"> • OEC Staff
Continue developing databases and general supervision practices to track compliance, findings, and correction of noncompliance	FFY 2010 through 2013	<ul style="list-style-type: none"> • OEC Staff • MSRRC
Conduct fiscal monitoring	FFY 2010 through 2013	<ul style="list-style-type: none"> • OEC Fiscal Monitors

Update and provide monitoring manual and data manual to LEAs	FFY 2010 through 2013	<ul style="list-style-type: none"> • OEC Staff • LEAs
Provide intensive technical assistance to LEAs with noncompliance and determinations below “Meets Requirements” through a variety of media, including virtually and face-to-face	FFY 2010 through 2013	<ul style="list-style-type: none"> • OEC Regional Representatives
Provide professional development to LEAs regarding Indicators 11 and 12	FFY 2010 through 2013	<ul style="list-style-type: none"> • OEC Staff • BabyNet Providers • Consultants • SPDG Grant

Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: Effective General Supervision Part B / General Supervision

Indicator 16: Percent of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint, or because the parent (or individual or organization) and the public agency agree to extend the time to engage in mediation or other alternative means of dispute resolution, if available in the State.

(20 U.S.C. 1416(a)(3)(B))

Measurement: Percent = [(1.1(b) + 1.1(c)) divided by 1.1] times 100.

FFY	Measurable and Rigorous Target
2010	100% of complaint investigations completed in a timely manner. (Met)

Table 16.1 – Actual Target Data for FFY 2010

SECTION A: Written, Signed Complaints	FFY 2010	FFY 2009
(1) Total number of written, signed complaints filed	41	40
(1.1) Complaints with reports issued	28	27
(a) Reports with findings of noncompliance	24	23
(b) Reports within timeline	28	27
(c) Reports within extended timelines	0	0
(1.2) Complaints pending	0	0
(a) Complaint pending a due process hearing	0	0
(1.3) Complaints withdrawn or dismissed	13	13

As shown in the Table 16.1, there were 28 complaints with reports issued in FFY 2010. Of those, all 28 had reports issued within the 60-day timeline. As a result, compliance to this indicator remains at 100 percent.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

The South Carolina Department of Education (SCDE) supports and encourages alternate dispute mechanisms at the LEA level and engages in a variety of problem-solving methods to facilitate the resolution of disputed issues between the parties during the complaint investigation

process. In addition, the Office of Exceptional Children employs an Ombudsperson to facilitate informal dispute resolutions along with the Office of General Counsel. The OEC has instituted a facilitated IEP process as another mechanism of informal dispute resolution.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011:

None.

Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: Effective General Supervision Part B/General Supervision

Indicator 17: Percent of adjudicated due process hearing requests that were adjudicated within the 45-day timeline or a timeline that is properly extended by the hearing officer at the request of either party or in the case of an expedited hearing, within the required timelines.

(20 U.S.C. 1416(a)(3)(B))

Measurement: Percent = [(3.2(a) + 3.2(b)) divided by 3.2] times 100.

FFY	Measurable and Rigorous Target
2010	100% of due process hearing and state-level reviews will be completed in a timely manner. (Met)

Table 17.1 – Actual Target Data for FFY 2010

SECTION C: Due Process Complaints	
(3) Total number of due process complaints filed	12
(3.1) Resolution meetings	8
(a) Written settlement agreements	6
(3.2) Hearings (fully adjudicated)	0
(a) Decisions within timeline (including expedited)	0
(b) Decisions within extended timeline	0
(3.3) Resolved without a hearing	12
SECTION D: Expedited Due Process Complaints (Related to Disciplinary Decision)	
(4) Expedited due process complaints total	1
(4.1) Resolution meetings	1
(a) Written settlement agreements	1
(4.2) Expedited hearings (fully adjudicated)	0
(a) Change of placement ordered	0

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

During FFY 2010 South Carolina maintained 100 percent compliance for this indicator by meeting its target for FFY 2010. There were twelve due process hearing requests filed during FFY 2010. Of the twelve requests for due process hearings all were resolved without a hearing. Eight resolution sessions occurred with six resulting in written resolution agreements. The remaining four requests that did not result in a resolution agreement were withdrawn by the filing party as a result of agreements reached outside the resolution session process, but prior to the expiration of the 45-day due process hearing timeline.

Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011:

None.

Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: Effective General Supervision Part B/General Supervision

Indicator 18: Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements.

Measurement: Percent = = (3.1(a) divided by 3.1) times 100.

FFY	Measurable and Rigorous Target
2010	62.5 percent of resolution sessions will result in written agreements. (Met)

Actual Target Data for FFY 2010:

During FFY 2010 there were twelve requests for due process hearings. There were eight resolution meetings conducted relative to these requests with six (75 percent) resolved through written settlement agreements.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

Technical assistance and other activities are ongoing and continuous. The Office of General Counsel (OGC) monitors and tracks the individual due process hearing requests and the scheduling of resolution meetings for compliance with timelines. The OGC also maintains regular contact with due process hearing officers, state-level review officers, and the appropriate local educational agency (LEA). When resolution meetings are not conducted within the required timelines, findings are made and corrective actions ordered.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011:

None.

Part B State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: Effective General Supervision Part B/General Supervision

Indicator 19: Percent of mediations held that resulted in mediation agreements.

(20 U.S.C. 1416(a)(3)(B))

Measurement: Percent = [(2.1(a)(i) + 2.1(b)(i)) divided by 2.1] times 100.

FFY	Measurable and Rigorous Target
2010	If more than ten mediation requests are filed, at least 75 percent of the requests will result in an agreement.

Table 19.1 – Actual Target Data for FFY 2010

SECTION B: Mediation requests	
(2) Total number of mediation request received	4
(2.1) Mediations held	2
(a) Mediations held related to due process complaints	1
(i) Mediations agreements related to due process	1
(b) Mediations held not related to due process complaints	1
(i) Mediations agreements (not related to due process)	1
(2.2) Mediations pending	0
(2.3) Mediations withdrawn or not held	2

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

There were fewer than ten mediations conducted between July 1, 2010, and June 30, 2011 (Two were held resulting in agreements). Because there were less than ten mediations conducted during this period of time, the state is not required to report data for this indicator or meet the target of at least 75 percent of the mediations held resulting in mediation agreements.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011:

None.

Part B State Annual Performance Report (APR) for South Carolina (FFY 2010)

Monitoring Priority: Effective General Supervision Part B / General Supervision

Indicator 20: State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.

(20 U.S.C. 1416(a)(3)(B))

Measurement:
 State reported data, including 618 data, State Performance Plan, and Annual Performance Reports, are:
 a. Submitted on or before due dates (February 1 for child count, including race and ethnicity; placement; November 1 for exiting, discipline, personnel and dispute resolution; and February 1 for Annual Performance Reports and assessment); and
 b. Accurate, including covering the correct year and following the correct measurement.
 States are required to use the “Indicator 20 Scoring Rubric” for reporting data for this indicator (see Attachment B).

FFY	Measurable and Rigorous Target
FFY 2010	100% of State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate (Met with 100%)

Table 20.1 – Actual Target Data for FFY 2010

100% (Met)

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2010:

Please see the attached Indicator 20 data rubric for details. For the FFY 2010 APR/SPP, the Office of Exceptional Children (OEC) has completed all data submission accurately and on time, resulting in 45 points. For 618 data, the OEC has also submitted data on accurately and time, resulting in 45 points. APR total 45, 618 total is 45, resulting in a grand total of 90 points. The percent of timely and accurate data (90/90 x 100) is 100 percent.

South Carolina has a data collection system that includes policies and procedures for collecting and reporting accurate State Performance Plan (SPP) and Annual Performance Report (APR) and 618 data. Currently the Office of Exceptional Children (OEC) uses a software program called Excent, which in addition to collecting data, provides districts with a standard IEP format. The capabilities of the Excent software enable all LEAs in the state to collect valid and reliable data that accurately reflects special education practices of the LEA.

Data for the indicators is collected in four ways – through Excent extractions, through district spreadsheet submissions, from outside survey and marketing contractors, and from other

divisions/offices at the South Carolina Department of Education (SCDE). Data extractions from the Excent program are used to report student level data for Indicators 5, 9, 10, 11, and 12 as well as Tables 1 and 3 (child count and environment), Table 4 (exiting). For Indicators 4A, 4B, 7 and 13, and Tables 5 and 8 data are gathered through LEA submissions and follow-up self-assessments. Data for Table 2 (personnel) is submitted by LEAs through an online system. The SCDE Office of Research supplies the OEC with data for Indicators 1, 2 and 3 and assessment data (Table 6). Outside survey contractors are used for Indicators 8 and 14. Data for Indicators 16 – 19 are provided to the OEC by the SCDE Office of General Counsel.

Beginning with FFY 2010, the OEC has been providing intensive technical assistance to LEAs who have determinations of Needs Intervention, to assist them in collecting, verifying and submitting timely and accurate data. The OEC conducted onsite verification and program evaluation visits to the multiple LEAs in FFY 2010. The OEC plans to continue working intensively with these LEAs and has already noted improvements in the timeliness and accuracy of data submissions and extractions

In FFY 2010, the OEC offered multiple avenues of technical assistance to all personnel involved in data collection, reporting and analysis. Technical assistance included but was not limited to:

- Monthly data webinars that address indicator and table data, submission requirements, or analysis,
- Quarterly presentations of data to the South Carolina Advisory Council for Children with Disabilities,
- Presentations at the Fall and Spring Administrators Conference, addressing data analyses, results, and implications for Part B SPP Indicators 1-20,
- Spring and Fall on-site trainings in the South Carolina's eight geographic regions,
- Pre-extractions by OEC staff that assist local education agencies (LEAs) in correcting any invalid information prior to the official data extraction,
- Instructional and Educational TV modules,
- Onsite tutorials with LEA staff,
- Virtual meetings through "Go to Meeting" with regional representatives and/or OEC data personnel,
- Instructional documents, including a comprehensive Data Manual containing report requirements, instructions, and instructional modules, and
- Postings on the SCDOE website, including a comprehensive data calendar.

The OEC will continue to improve and increase the level of technical assistance to all personnel in the LEAs who are responsible for data collection, reporting and analysis.

Prior to the submission of the FFY 2010 – 2011 618 Tables, South Carolina had achieved the congruency requirements for EDFacts reporting of all 618 Tables except Table 6. Throughout FFY 2010 – 2011 and into FFY 2011 – 2012, SCDE staff worked closely with staff in the Office of Special Education Programs, other U.S. Department of Education offices, and technical assistance providers to ensure the congruency of Table 6 with other federal reports. South Carolina's FFY 2010 – 2011 IDEA assessment results were found by the OSEP to be sufficiently

congruent (100%). Therefore, the state is approved to submit its FFY 2011 – 2011 IDEA assessment data exclusively via EDFacts. As a result, South Carolina now has approval for “EDFacts-Only” reporting of all 618 Tables.

Revisions, with Justifications to Proposed Targets/Improvement Activities/Timelines/Resources for 2011:

None.

Appendix A: Part B Indicator 20 Data Rubric

Part B Indicator 20 - SPP/APR Data			
APR Indicator	Valid and reliable	Correct calculation	Total
1	1		1
2	1		1
3A	1	1	2
3B	1	1	2
3C	1	1	2
4A	1	1	2
4B	1	1	2
5	1	1	2
7	1	1	2
8	1	1	2
9	1	1	2
10	1	1	2
11	1	1	2
12	1	1	2
13	1	1	2
14	1	1	2
15	1	1	2
16	1	1	2
17	1	1	2
18	1	1	2
19	1	1	2
		Subtotal	40
APR Score Calculation	Timely Submission Points - If the FFY 2010 APR was submitted on-time, place the number 5 in the cell on the right.		5
	Grand Total – (Sum of the subtotal and Timely Submission Points) =		45.00

Part B Indicator 20 - 618 Data					
Table	Timely	Complete Data	Passed Edit Check	Responded to Date Note Requests	Total
Table 1 – Child Count Due Date: 2/2/11	1	1	1	1	4
Table 2 – Personnel Due Date: 11/2/11	1	1	1	N/A	3
Table 3 – Ed. Environments Due Date: 2/2/11	1	1	1	1	4
Table 4 – Exiting Due Date: 11/2/11	1	1	1	N/A	3
Table 5 – Discipline Due Date: 11/2/11	1	1	1	N/A	3
Table 6 – State Assessment Due Date: 12/15/11	1	NA	NA	N/A	1
Table 7 – Dispute Resolution Due Date: 11/2/11	1	1	1	N/A	3
Table 8 0 MOE/CEIS Due Date: 5/1/11	1	N/A	N/A	N/A	1
				Subtotal	22
618 Score Calculation			Grand Total (Subtotal X 2.045)=		45

Indicator #20 Calculation	
A. APR Grand Total	45.00
B. 618 Grand Total	45.00
C. APR Grand Total (A) + 618 Grand Total (B) =	90.00
Total N/A in APR	0
Total N/A in 618	0
	Base
D. Subtotal (C divided by Base*) =	90.00
E. Indicator Score (Subtotal D x 100) =	1.000
	100.00