SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MEMORANDUM

TO: District Superintendents
District Personnel Administrators
District Instructional Leaders
Chief Financial Officers
District Special Education Directors
District ADEPT Coordinators

FROM: Melanie Cooper, Director of Finance
Mary Hipp, Director of Educator Services
Kimberly Mack, Director of Leadership Effectiveness
Makenzie Segars, Assistant General Counsel

DATE: September 29, 2026

RE: Required Reporting, Certification, Background Checks, and Evaluation of Purchased-Service Teachers

This memorandum repeats guidance provided to districts in September 2023. The South Carolina Department of Education (SCDE) routinely fields inquiries from districts about the employment, certification, and evaluation of Purchased-Service Teachers and other contractors. Although the SCDE recognizes the need in many districts to employ contractors to address staffing needs, the employment of contractors does not release school districts from their responsibilities to ensure student safety and educator quality. This memorandum provides clarification of South Carolina requirements for school districts in the employment, certification, evaluation, and vetting of Purchased-Service Teachers.

Definition and SC Educator Compensation Requirements

A Purchased-Service Teacher is defined as an educator who delivers instruction, facilitates learning experiences, or provides related educational services to students in face-to-face, virtual, or hybrid modalities, but is not compensated directly through a district's payroll system. Instead, a Purchased-Service Teacher is compensated through a contracted vendor or third-party provider. In this context, the term 'instruction' includes activities directly related to teaching students or supporting the instructional program of a school.

The category Purchased-Service Teacher encompasses classroom teachers, including special education teachers; speech-language pathologists (SLPs); school psychologists; and other professional positions. Typically, compensation for Purchased-Service Teachers is allocated from function code 1xx and object code 3xx.

Districts are required by the SCDE to enter all Purchased-Service Teachers in the SC Educator Compensation system with **Position Code 46** and designate each individual's specific role (i.e., classroom teacher, SLP, school psychologist) in the notes section. Entering all educators into the Compensation system allows the SCDE to meet federal and state data reporting requirements and to ensure that each educator is issued eligible experience credit during the annual automated update process. Contact Melanie Cooper, **mcooper@ed.sc.gov,** with reporting questions.

Certification Requirements

Pursuant to **State Board of Education Regulation 43-50**, Persons Required to Hold a Teaching Certificate, "each individual employed in an instructional, classroom teaching position or who serves in a position designed for the support of the instructional program in a public school of this state must hold an appropriate South Carolina teaching credential." Essentially, educators providing instruction or related instructional support and educational services to students in a South Carolina public school must hold an educator certificate issued by the SCDE and State Board of Education. This requirement applies to all individuals working in these roles whether they are compensated directly through a district's payroll system or as a Purchased-Service Teacher through a third-party provider. Districts must ensure that purchased-service educators are appropriately certified for the roles to which they are assigned and, through their assigned contact in the Office of Educator Services, should monitor the eligibility status of purchased-service educators who have applied for certification.

The only exceptions to this certification requirement are statutory allowances under the Charter School Act, **S.C. Code Ann. § 59-40-50(A)** and schools of innovation waivers pursuant to **S.C. Code Ann. § 59-19-350**. Contact Mary Hipp, **mhipp@ed.sc.gov,** with certification questions.

Evaluation Requirements

School districts may choose to use the Assisting, Developing, and Evaluating Professional Teaching (ADEPT) system for Purchased-Service Teachers to ensure educator quality. The SCDE encourages districts to utilize the ADEPT system for the support and evaluation of these educators, noting that a successful summative evaluation as part of the ADEPT process is necessary for a teacher to advance from an Initial to a Professional teaching certificate. In districts where Purchased-Service Teachers are offered a Letter of Agreement, **Regulation 43-205.1**, IX., B. applies: "Teachers employed under a letter of agreement do not fall under ADEPT. However, districts must ensure that these teachers receive appropriate assistance and supervision throughout the school year." At a minimum, districts must provide appropriate assistance and supervision, including regular formal and/or informal observations of all Purchased-Service Teachers.

For teachers in virtual settings, the National Institute for Excellence in Teaching (NIET) **Instructional Strategies for Virtual Learning** provides descriptions of high-quality virtual instructional strategies aligned with the South Carolina Teaching Standards 4.0. Contact Kimberly Howard at **khoward@ed.sc.gov** for evaluation questions.

Background Checks

Pursuant to **S.C. Code Ann. § 59-25-115,** all applicants for educator certification must undergo a fingerprint-based, federal and state criminal history review prior to issuance of a South Carolina educator credential. Completion of the fingerprinting process for certification eligibility is the responsibility of the applicant, and the SCDE will not issue an educator certificate to any individual who has not completed this clearance review.

Additionally, and pursuant to **S.C. Code Ann. § 59-19-117,** districts have a statutory mandate to conduct background checks of individuals hired to serve in any capacity in a public school in the state prior to their employment. These background checks must include, at minimum, a name-based South Carolina criminal history search using records maintained by the State Law Enforcement Division (SLED) and a search of the National Sex Offender Registry. For the safety and well-being of students in the state, the SCDE Office of General Counsel has determined that this statutory requirement applies to individuals serving in any capacity in a public school, including those who will be compensated directly through a district's payroll system as well as those contracted and paid through a third-party provider. Contact Assistant General Counsel Makenzie Segars at **mpsegars@ed.sc.gov** for mandated district background check questions.