



# LEGISLATIVE OVERSIGHT COMMITTEE

## Education and Cultural Subcommittee

### Study of the Wil Lou Gray Opportunity School *July 26, 2019*

FULL COMMITTEE OPTIONS STANDARD PRACTICE 12.4	FULL COMMITTEE ACTION(S)	DATE(S) OF FULL COMMITTEE ACTION(S)
(1) Refer the study and investigation back to the Subcommittee or an ad hoc committee for further evaluation; (2) Approve the Subcommittee's study; or (3) Further evaluate the agency as a full Committee, utilizing any of the available tools of legislative oversight.		

# Legislative Oversight Committee



Post Office Box 11867  
Columbia, South Carolina 29211  
Telephone: (803) 212-6810 • Fax: (803) 212-6811  
*Room 228 Blatt Building*

*Wm. Weston J. Newton, Chair*  
*Laurie Slade Funderburk, First Vice-Chair*

*Micajah P. (Micah) Caskey, IV*  
*Neal A. Collins*  
***Patricia Moore (Pat) Henegan***  
*William M. (Bill) Hixon*  
*Jeffrey E. (Jeff) Johnson*  
*Marvin R. Pendarvis*  
***Tommy M. Stringer***  
*Bill Taylor*  
*Robert Q. Williams*

*Gary E. Clary*  
*Chandra E. Dillard*  
*Lee Hewitt*  
***Joseph H. Jefferson, Jr.\****  
*Mandy Powers Norrell*  
*Robert L. Ridgeway, III*  
*Edward R. Tallon, Sr.*  
*John Taliaferro (Jay) West, IV*  
*Chris Wooten*

*Jennifer L. Dobson*  
*Research Director*

*Charles L. Appleby, IV*  
*Legal Counsel*

***Carmen J. McCutcheon Simon***  
*Research Analyst/Auditor*

*Cathy A. Greer*  
*Administration Coordinator*

*Kendra H. Wilkerson*  
*Fiscal/Research Analyst*

Members of the Education and Cultural Subcommittee and the Subcommittee's primary staff person are in bold font. An asterisk designates the chair.

# TABLE OF CONTENTS

## Table of Contents

<b>Table of Contents</b> .....	<b>3</b>
<b>Agency Snapshot</b> .....	<b>4</b>
<b>Legislative History</b> .....	<b>5</b>
<b>Recommendations</b> .....	<b>5</b>
<b>Study-Related Internal Changes</b> .....	<b>9</b>
<b>Study Process</b> .....	<b>10</b>
Agency Selection.....	10
Subcommittee Membership.....	10
Agency Reports to Legislative Oversight Committee .....	10
Information from the Public.....	10
Meetings Regarding the Agency.....	10
<i>122<sup>nd</sup> General Assembly (2017-2018)</i> .....	<i>11</i>
<i>123<sup>rd</sup> General Assembly (2019-2020)</i> .....	<i>11</i>
Study Process Completion.....	12
<b>Selected Agency Information</b> .....	<b>14</b>
<b>Appendix A. Agency Overview</b> .....	<b>15</b>
History .....	15
Legal Obligations .....	16
Agency Organization and Employees .....	16
Customers, Strategic Resources, and Performance .....	20
Key Federal and Local Partners .....	24
<b>Appendix B. Agency Reports to Committee</b> .....	<b>25</b>
<b>Appendix C. Public Input</b> .....	<b>26</b>
<b>Appendix D. Recommendation Received for Information Purposes</b> .....	<b>27</b>
<b>Contact Information</b> .....	<b>28</b>
<b>Endnotes</b> .....	<b>28</b>

# AGENCY SNAPSHOT

## Wil Lou Gray Opportunity School

### Agency History

In 1921, Dr. Wil Lou Gray, Supervisor of Adult Schools for the S.C. Department of Education, opened the Opportunity School in Tamasee as an experiment in adult education for women and girls. Between 1921 and 1947, the school rotated around the state, including stops at Anderson, Erskine, Lander, Clemson, and Columbia Colleges. In 1957, the General Assembly declared the school a body politic under the oversight of a board of trustees.

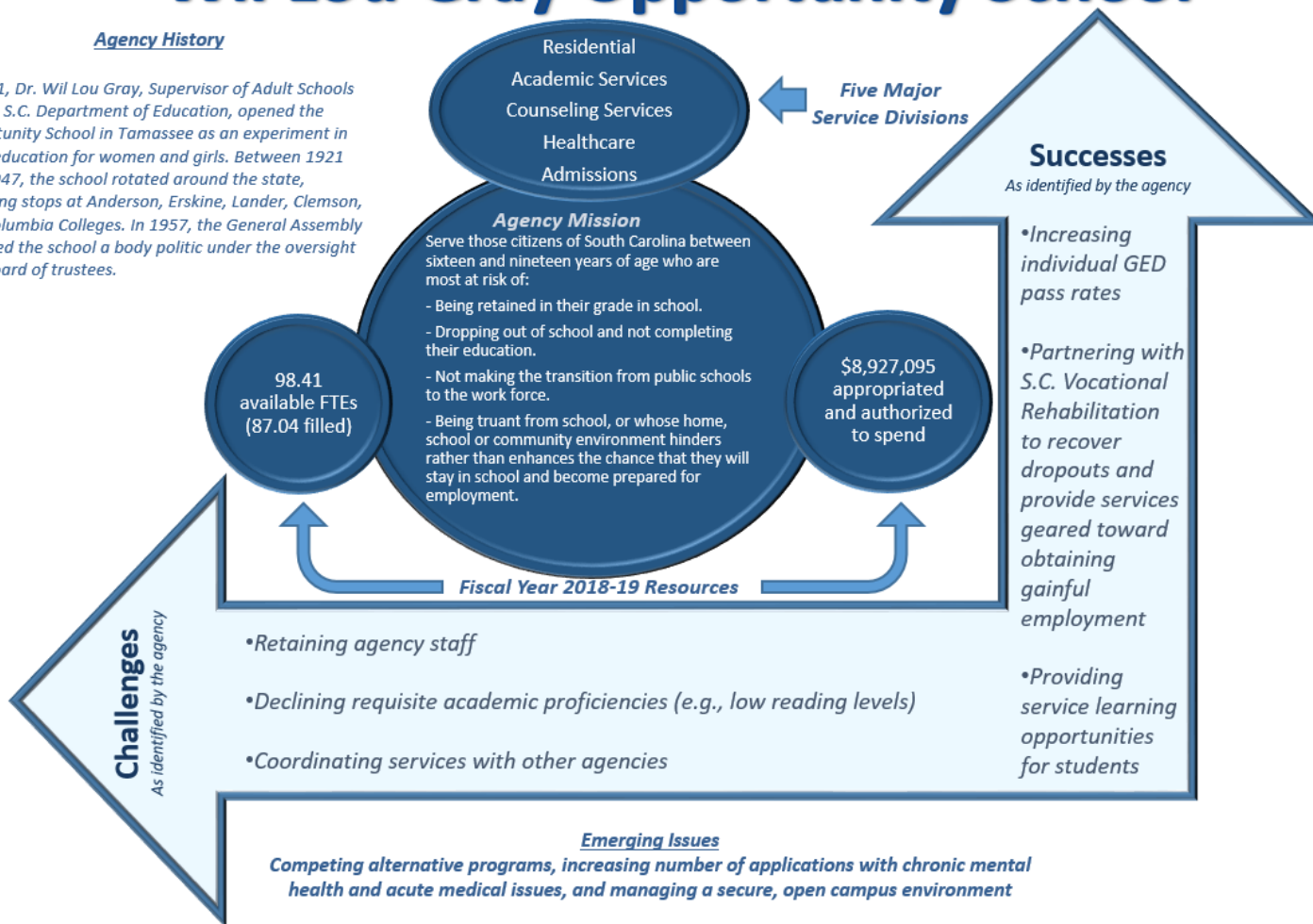


Figure 1. Snapshot of agency's history, major programs, Fiscal Year 2018 – 19 resources, successes, challenges, and emerging issues<sup>1</sup>

# LEGISLATIVE HISTORY

The following are significant legislative events pertaining to the Wil Lou Gray Opportunity School:

1957	Declaration of the “South Carolina Opportunity School” as a body politic, located in Lexington County under the oversight of an 11-member board of trustees <sup>2</sup>
1969	Enlargement of the board of trustees from 11 members to fourteen members <sup>3</sup>
1976	Renamed the “Wil Lou Gray Opportunity School” to honor the school’s founder and long-time director <sup>4</sup>
1992	Revisions made to manner of selection of the board of trustees and its officers <sup>5</sup>
2018	Mandatory training required for all members of the board of trustees <sup>6</sup> Reduction of the board of trustees from 14 to 12 members, all of whom are elected by the General Assembly <sup>7</sup>

Figure 2. Timeline of WLGOs legislative history

# RECOMMENDATIONS

The following **recommendations continue, curtail, and/or eliminate Wil Lou Gray Opportunity School (WLGOS, agency) programs**, and include areas for **potential improvement**. The Healthcare and Regulatory Subcommittee (Subcommittee) recognizes **these recommendations will not satisfy everyone nor address every issue or potential area of improvement at the agency**. These recommendations are based on the agency’s self-analysis requested by the Legislative Oversight Committee (Committee), discussions with the agency during multiple meetings, and analysis of the information obtained by the Subcommittee. This information, including, but not limited to, the Program Evaluation Report, Accountability Report, Restructuring Report and videos of meetings with the agency, is available on the Committee’s website.

The **Subcommittee has nine recommendations**. The Subcommittee’s recommendations are adopted at its June 11, 2019, meeting; all members present at the meeting vote to approve the recommendations.<sup>8</sup> The Subcommittee’s recommendations fall into four categories: (1) governance; (2) promising practices; (3) applicant pool; and (4) student experience. An overview of these recommendations is provided in the Executive Summary on page 1.

Table 1. Governance recommendations to the Wil Lou Gray Opportunity School

Recommendations to the Wil Lou Gray Opportunity School	
Board Training	1.) Enhance the training required by S.C. Code Ann. § 59-51-35, by adding topics on South Carolina state government processes, including but not limited to, procurement, audit, and finance.
Board Effectiveness	2a.) Investigate methods to ascertain the effectiveness of the governing body. 2b.) Add related board effectiveness performance measures to the measures reported on in the annual accountability report.

### Board Training

S.C. Code Ann. § 59-51-35, which became effective May 15, 2018, requires the following occur within one year of taking office:

All members of the board of trustees shall complete successfully a training program on the powers, duties, and responsibilities of a board member including, but not limited to, topics on policy development, personnel, school leadership and board relations, at-risk programs, finance, school law, ethics, and community relations, as determined by the board of trustees. Training also must be provided regarding how to best serve the at-risk students in their care.<sup>9</sup>

During the study, Subcommittee members inquire about the content and effectiveness of the offered training, specifically whether the training includes guidance on the operation of state government (e.g., procurement procedures or human resources). In February, the agency’s response is:

Under the leadership of the board, the agency director assumes responsibility for agency operations in accordance with Board policies. As the board is primarily responsible for establishing the agency’s mission and vision, developing policy and providing oversight, detailed training on specific administrative areas within the operation of a state agency are not conducted.<sup>10</sup>

The agency’s June response to a request for a detailed list of topics covered in the board training notes state procurement regulations and human resources will be added to the training.<sup>11</sup>

While the board is not responsible for implementing many of the procedures required of state agencies, it is difficult to perform oversight of something you do not understand. The board may be at a disadvantage for effective policymaking if the members are unable to detect when something is not working because they are not knowledgeable about how it should work. Wil Lou Gray board members have varying professional backgrounds. Some are state employees who may have more familiarity with state government processes. Others have experience in school districts or the private sector.<sup>12</sup> These diverse backgrounds may not include basic knowledge of matters essential to the functioning of the entity the board governs.

### Board Effectiveness

During the study, a Subcommittee member notes when he became a member of a university board of trustees, he inquired about available training from the state procurement office and was told he was the first agency board member to request that type of training. He further notes this training and other relevant training makes a “world of difference” in how the board operated.<sup>13</sup> While a logical assumption is that board training improves effectiveness, without data, it remains unproven. If data indicates WLGO’s training is effective, some portions of it might be replicable across state government.

Table 2. Promising practices recommendations to the Wil Lou Gray Opportunity School

Recommendations to the Wil Lou Gray Opportunity School	
Program Evaluation	3.) Contract for a formal educational program evaluation focused on correlating Wil Lou Gray Opportunity School’s program structure and program implementation with its results.
	4.) Post any replicable promising practices, indicated by the program evaluation, to the agency website and notify the Department of Education, State Board of Education, Education Oversight Committee, and all education-related legislative committees.

S.C. Code Ann. § 59-51-10(3) requires WLGOS to disseminate information concerning practices that have proven to be effective in working with its students. WLGOS is an investment of the state, and one potential return on investment, in addition to aiding students who might not otherwise earn a high school equivalency diploma in becoming productive adults, is being able to take what works at Wil Lou Gray and replicate it across the state, where feasible. During the study, the agency presents anecdotal evidence that its model is successful for certain students.<sup>14</sup> Better data could help policymakers determine if some of the programs can or should be replicated in other places.

Table 3. Applicant pool recommendations to the Wil Lou Gray Opportunity School and the South Carolina General Assembly

Recommendation to the South Carolina General Assembly	
Target Applicants	5.) Amend S.C. Code Ann. § 59-65-470 to require school principals to seek parental consent to release names and addresses of students who are at risk of not completing high school. With consent, principals must supply names and addresses of students who are at risk of not completing high school to Wil Lou Gray Opportunity School. Failure to seek consent and/or provide Wil Lou Gray Opportunity School with names and addresses of students who have consented and are at risk of not completing high school may result in loss of state funding. The South Carolina Department of Education shall oversee any complaints by Wil Lou Gray Opportunity School regarding a principal withholding information and the Department may withhold state funding from a district until the district complies.
Recommendations to the Wil Lou Gray Opportunity School	
Marketing Strategy	6.) Develop a system to track interactions with school or district personnel, by the type of interaction. Periodically use the data to ascertain what types of interactions have been successful, and where. Adjust the strategy if the data warrants.
Demographic Data	7.) Amend the student application such that the demographic data collected on race and ethnicity is accurate.

*Target Applicants*

S.C. Code Ann. § 59-65-470 states:

To enable the Wil Lou Gray Opportunity School to inform dropouts of the school's academic and vocational training programs, the school is authorized to contact the attendance supervisors or principals at the various high schools or school districts of this State at reasonable intervals for the purpose of receiving access to the names and addresses of students reported by the supervisors and principals to be dropouts, and the attendance supervisors and principals must supply this information to the Wil Lou Gray Opportunity School.

During the study, an agency representative testifies WLGOS has “difficulty through the years having that shared information,” for various reasons.<sup>15</sup> One reason local education authorities might not be able to share this information is the Family Educational Rights and Privacy Act (FERPA). This federal law affords parents the right to have access to their children’s education records, the right to seek to have the records amended, and the right to have some control over the disclosure of personally identifiable information from the education records.<sup>16</sup> Without consent from an adult (i.e., is over age 18) student or the legal guardian of a minor student, disclosure of a name and address of a student who has dropped out to Wil Lou Gray would generally violate FERPA. As such, the Subcommittee recommends amending current state law to require schools to take affirmative steps to obtain consent to release this personally identifiable information.

*Demographic Data*

In the agency’s February 11, 2019, letter to the Subcommittee, data relating to race and ethnicity of the student population is provided. However, in this letter, race and ethnicity, which are not the same, are conflated.<sup>17</sup> For instance, in a pie chart about race, it is reported that 3.76% of students are Hispanic, which is considered an ethnicity by the United States Census Bureau.<sup>18</sup>

A potential contributing factor to the conflation of race and ethnicity is how the agency collects this information. On the student application, it is an open-ended question.<sup>19</sup> While race and ethnicity are not the same, people filling out the application may conflate the two when responding to an open-ended question.

*Table 4. Student experience recommendations to the Wil Lou Gray Opportunity School*

Recommendations to the Wil Lou Gray Opportunity School	
Student Handbook	8.) Institute regular formal review of the student handbook and update when necessary. Ensure appearance and grooming rules are consistent with the most up-to-date Army JROTC (Junior Reserve Officers’ Training Corps) rules.
Volunteer Opportunities	9.) Consider providing diverse community service options, which include both singular (i.e., one-time or event-based) and recurring (i.e., regular services at an organization) opportunities for students.

*Student Handbook*

In response to a Subcommittee request WLGOS submits its Cadet Handbook.<sup>20</sup> The handbook is undated and appears out of date as it contains uniform and appearance rules that do not reflect current Army Junior Reserve Officers’ Training Corps regulations.<sup>21</sup>

*Volunteer Opportunities*

In response to the Subcommittee’s inquiry regarding community service opportunities, the agency lists multiple singular options (i.e., one time or event-based) for students.<sup>22</sup> Recurring community service options (i.e., regular service at an organization) may help some students gain leadership skills and continue to gain a sense of accountability.



## STUDY-RELATED INTERNAL CHANGES

During the study process, the agency implements three internal changes directly related to participation in the study process:

- Reviewing marketing strategies;
- Investigating raising the age limit from 19 to 21 because Wil Lou Gray is an adult education facility, and they have received interest from those that are 20 and 21;
- Getting involved with the Department of Mental Health's Community Crisis and Response program so that there can be quick intervention for students with emergent mental health needs.<sup>23</sup>

# STUDY PROCESS

## *Agency Selection*

Wil Lou Gray Opportunity School is an agency subject to legislative oversight.<sup>24</sup> On May 3, 2018, during the 122<sup>nd</sup> General Assembly, the Committee prioritizes the agency for study.<sup>25</sup> The entire study process is summarized in Figure 2 below.

As the Committee encourages **collaboration in its legislative oversight process**, the Committee notifies the following individuals about the agency study: Speaker of the House, standing committee chairs in the House, members of the House, Clerk of the Senate, and Governor.

## *Subcommittee Membership*

The **Education and Cultural Subcommittee of the House Legislative Oversight Committee studies the agency**.<sup>26</sup> The study begins during the 122<sup>nd</sup> General Assembly and continues during the 123<sup>rd</sup> General Assembly. Throughout the study, the Honorable Joseph H. Jefferson serves as chair. Other Subcommittee Members include:

- The Honorable Neal A. Collins (123<sup>rd</sup> General Assembly);
- The Honorable Chandra E. Dillard (122<sup>nd</sup> General Assembly);
- The Honorable Patricia Moore "Pat" Henegan (123<sup>rd</sup> General Assembly);
- The Honorable Tommy M. Stringer (122<sup>nd</sup> and 123<sup>rd</sup> General Assemblies); and
- The Honorable John Taliaferro "Jay" West, IV (122<sup>nd</sup> General Assembly).<sup>27</sup>

## *Agency Reports to Legislative Oversight Committee*

During the legislative oversight process, the **Committee asks the agency to conduct self-analysis** by requiring it to complete and submit annual Restructuring Reports, a Seven-Year Plan for cost savings and increased efficiencies, and a Program Evaluation Report. Details about each report, including the submission dates, are included in Appendix B. The Committee posts each report on the agency page of the Committee's website.

## *Information from the Public*

**Public input is a cornerstone of the House Legislative Oversight Committee's process**.<sup>28</sup> There is a variety of opportunities for public input during the legislative oversight process. Members of the public have an opportunity to participate anonymously in a public survey, provide comments anonymously via a link on the Committee's website, and appear in person before the Committee.<sup>29</sup> During the study, media articles related to the agency are compiled for member review. Details about each form of input are included in Appendix C.

## *Meetings Regarding the Agency*

The Committee meets with, or about, the agency on two occasions, and the Subcommittee meets with, or about, the agency on five occasions. All meetings are open to the public and stream live online; also,

the videos are archived and the minutes are available online. A timeline of meetings is set forth in Figure 3.

### *122<sup>nd</sup> General Assembly (2017-2018)*

**May 3, 2018** The full Committee selects the agency for study, which is **Meeting 1**.<sup>30</sup>  
Full Committee

### *123<sup>rd</sup> General Assembly (2019-2020)*

**January 14, 2019** The full Committee holds **Meeting 2** with WLGOS to **receive public testimony**  
Full Committee about it and the Departments of Mental Health and Motor Vehicles.<sup>31</sup> Six people provide testimony about WLGOS:

- Laura Spears, Department of Vocational Rehabilitation transition services coordinator;
- Shaun Robey, former student;
- Christie Mendez, parent of former students;
- Kristina Duncan, parent of former student;
- James Miller, former JROTC instructor; and
- Russell Hart, WLGOS Board Chair.

Pat Smith, WLGOS Director, makes brief comments to the Committee.

**January 31, 2019** The Healthcare and Regulatory Subcommittee holds **Meeting 3** with the  
Subcommittee agency.<sup>32</sup> Director Smith and Melissa Thurstin, Director of Finance and Human Resources, provide an **overview of WLGOS' history, mission, strategic goals, human resources, and financial resources**. During their testimony, they respond to questions from Subcommittee members about agency board participation and training, student capacity, admissions process, marketing, fundraising, methods for following graduate progress, and the agency's partnership with Lexington School District Two.

**February 12, 2019** The Subcommittee holds **Meeting 4** with the agency.<sup>33</sup> Director Smith and Scott  
Subcommittee Gaines, Principal, provide testimony about **WLGOS' student enrollment**. During their testimony, they respond to questions from Subcommittee members about enrollment procedures, marketing, board training, student dropouts, and expulsions.

**February 28, 2019** The Subcommittee holds **Meeting 5** with the agency.<sup>34</sup> Principal Gaines provides  
Subcommittee testimony about **WLGOS' educational services**. Diane McNinch, Crisis Counselor, and Lettice Glenn, Social Worker, provide testimony about the **counseling department**. Brenda Arant, Healthcare Director, provides testimony about the **medical department**. During their testimony, they respond to questions from Subcommittee members about the following topics:

- Student grade-level improvement;
- Special education services;
- Educational testing (e.g., GED, SAT, and ACT);
- Home-visits;
- Crisis mental health counselors;
- Reports to the Department of Social Services;
- Academic risk indicator; and
- Substance abuse.

**March 21, 2019**  
Subcommittee

The Subcommittee holds **Meeting 6** with the agency.<sup>35</sup> Finance and Human Resources Director Melissa Thurstin and Theresa Trowell, Human Resources Manager, provide testimony about **staffing, employee retention measures, and employee training**. During their testimony, they respond to questions from Subcommittee members about medical staff turnover, student transportation, methods for receiving feedback about employee work conditions, and methods for receiving feedback from parents and guardians.

**June 11, 2019**  
Subcommittee

The Subcommittee holds **Meeting 7** with the agency.<sup>36</sup> Director Smith **notes the agency surpassed the 2,500 GEDs awarded mark** this year, and at the request of Chair Jefferson, provides an update on the **agency's internal changes associated with the study process**. Then, the Subcommittee receives the agency's single recommendation for information purposes (see [Appendix D](#)). In addition, the Subcommittee **makes eight recommendations to the agency and one recommendation for a statutory change** (see the [Recommendations](#) section). Finally, Subcommittee Chair Jefferson directs Committee staff to draft the study report with the Subcommittee's recommendations.

## *Study Process Completion*

Pursuant to Committee Standard Practice 11.8, **any Subcommittee member may provide a separate written statement for inclusion with the Subcommittee's study report**. After receipt of any written statements, the Subcommittee Chair, pursuant to Committee Standard Practice 11.9, notifies the Committee Chair in writing that a Subcommittee study is available for consideration by the full Committee.

Pursuant to Committee Standard Practice 12, the Committee Chair includes the Subcommittee Study on the agenda for a full Committee meeting after receiving written notice from the Subcommittee Chair. During a full Committee meeting at which the Subcommittee study is discussed, the Committee may vote to (1) refer the study and investigation back to the Subcommittee for further evaluation; (2) approve the Subcommittee's study; or (3) further evaluate the agency as a full Committee, utilizing any of the resources of legislative oversight available.

When the Committee approves a study, **any member of the Committee may provide a written statement for inclusion with the study**. The study, and written statements, are published online and the agency receives a copy.<sup>37</sup>

To support the Committee’s ongoing oversight by maintaining current information about the agency, the agency may receive an annual Request for Information.

### Legislative Oversight Committee Actions

- May 3, 2018 - Selects the agency for study in **Meeting 1**
- May 9, 2018 - Provides the agency with notice about the oversight process
- July 17 - August 20, 2018 - Solicits input from the public about the agency in the form of an online survey
- January 14, 2019 - Holds **Meeting 2** to **obtain public input** about the agency

### Education and Cultural Subcommittee Actions

- January 31, 2019 - Holds **Meeting 3** with the agency to receive an overview of the agency's **history, mission, strategic goals, human resources, and financial resources**
- February 12, 2019 - Holds **Meeting 4** with the agency to receive testimony about **student enrollment**
- February 28, 2019 - Holds **Meeting 5** with the agency to receive testimony about **educational services, counseling department, and medical department**
- March 21, 2019 - Holds **Meeting 6** with the agency to receive testimony about **staffing, employee retention measures, and employee training**
- June 11, 2019 - Holds **Meeting 7** with the agency to make **recommendations** and receive testimony about **agency internal changes**

### Wil Lou Gray Opportunity School Actions

- March 11, 2015 - Submits its **Annual Restructuring and Seven-Year Plan Report**
- January 11, 2016 - Submits its **2016 Annual Restructuring Report**
- September 2016 - Submits its **FY 2015-16 Accountability Report/Annual Restructuring Report**
- September 2017 - Submits its **FY 2016-17 Accountability Report/Annual Restructuring Report**
- September 2018 - Submits its **FY 2017-18 Accountability Report/Annual Restructuring Report**
- November 11, 2018 - Submits its **Program Evaluation Report**
- January - June 2019 - Meets with and **responds to Subcommittee inquiries**

### Public’s Actions

- July 17 - August 20, 2018 - Provides input about the agency via an **online public survey**
- January 14, 2019 - Provides testimony at public input meeting

*Figure 3. Summary of key dates in the study process*

## SELECTED AGENCY INFORMATION

**Wil Lou Gray Opportunity School. “Program Evaluation Report, 2018.”**

[https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/WilLouGray/PER\\_Final%20PDF.PDF](https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/WilLouGray/PER_Final%20PDF.PDF) (accessed June 14, 2019).

**Wil Lou Gray Opportunity School. “Restructuring and Seven-Year Plan Report, 2015.”**

<https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/2015AgencyRestructuringandSevenYearPlanReports/2015%20Wil%20Lou%20Gray%20Opportunity%20School.pdf> (accessed June 14, 2019).

**Wil Lou Gray Opportunity School. “Agency Accountability Report, 2018.”**

<https://www.scstatehouse.gov/reports/aar2018/H710.pdf> (accessed June 14, 2019).

**S.C. House of Representatives, Legislative Oversight Committee. “July 17 – August 20, 2018 Survey Results.”**

[https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/Corrections/Public\\_Survey\\_JulAug2018.PDF](https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/Corrections/Public_Survey_JulAug2018.PDF) (accessed June 14, 2019).

## APPENDIX A. AGENCY OVERVIEW

The Committee requests the agency provide background information via the Program Evaluation Report, Accountability Report, and correspondence. The sections below provide an overview of the agency, as reflected in these submissions. It is augmented by information provided by other state agencies that aggregate statewide data.

### *History*

The **Wil Lou Gray Opportunity School provides the Committee with an overview of the agency's history.**<sup>38</sup> In addition, Committee staff confirms the accuracy of assertions of legislative action.

Wil Lou Gray devoted her career to the eradication of illiteracy in South Carolina during a career that spanned eight decades, and it is by virtue of this work that she is today recognized as a pioneer in the field of adult education. Her landmark achievement was the establishment of the South Carolina Opportunity School in 1947, an institution that in 1976 became known as the Wil Lou Gray Opportunity School. "Why Stop Learning?" is the simple motto inscribed on the gates of the school, and although adult education is no longer the school's focus, today it functions within the state educational system to assist at-risk teenagers in completing high school.

Dr. Gray was a powerhouse of ideas, an energetic advocate of social justice and a passionate South Carolinian. Born and raised in Laurens, South Carolina, Gray attended Columbia College and began her teaching career in 1903 at Jones School in Greenwood, South Carolina. After completing a Master of Arts in Political Science from Columbia University in 1911, she assumed the role of Supervisor of Rural Schools in Laurens County for the South Carolina Department of Education. Here in 1915 she started the first rural night school program in the state to provide elementary instruction in reading, writing and arithmetic to illiterate adults in the community. The statewide acclaim she earned for this work led to an appointment as the field secretary for the Illiteracy Commission of South Carolina during World War I. In January of 1919 the General Assembly made permanent her position, and she served as Supervisor of Adult Schools for the South Carolina Department of Education from 1919 until her retirement in 1947 when she became the director of the South Carolina Opportunity School on land given to her by the state. From this position of leadership, Gray cultivated adult education from an obscure idea few people knew anything about to a tax-funded division of the state educational system. "She contributed a tremendous amount to this state, particularly in adult education," said former South Carolina Superintendent of Education Charlie Williams, "the basic program we have today had its beginning with her."

The milestone event in Gray's career was the creation of the opportunity school in 1921. The opportunity school was a four-week vacation boarding camp held in late summer that provided instruction in reading, writing, arithmetic, domestic arts, health education, etiquette and citizenship to illiterate and semi-literate adults. Gray developed this unique, adult-centered summer school at a time when there were limited public options for adults to acquire a formal education in South Carolina. The first opportunity school summer program enrolled white women only, but by 1923 included men, and by 1931, black and white male and female students. Between 1921 and 1947 numerous state colleges hosted summer opportunity schools including Anderson, Lander, Erskine and Clemson, where camps for white men and women were consolidated in 1931. Though segregated by race, the opportunity schools by 1931 were not segregated by gender. Men and women attended school together at Clemson and in Seneca where a concurrent opportunity school for black adults opened at the Seneca Institute in Seneca, South Carolina. Both the black and white opportunity schools used common educational testing and training materials, and the success of

the Seneca program served as a precedent for the establishment of subsequent opportunity schools for African American adults held at Voorhees School and Junior College (Episcopal- later Voorhees Normal and Industrial College) in Denmark, South Carolina from 1934 to 1937. In 1938 and in conjunction with the Works Progress Administration, a summer camp was held at Benedict College with 72 black students in attendance. In 1947 the state endorsed the creation of a year-round opportunity school, The South Carolina Opportunity School, and Gray served as the director until her retirement a decade later.

She died in 1984 at the age of one hundred. In an epitaph marking the event Governor Riley proclaimed, “[d]uring her 100 years on earth, she dealt with other people’s problems day by day, hour by hour, and person by person... I wish she had lived to be 200.” As a testament to her century of public service, The Wil Lou Gray Opportunity School in West Columbia bears her name, and her portrait hangs in the South Carolina State House gallery beside African American educator Mary McLeod Bethune. An admirer of Gray wrote, “[i]f ever anyone has reason to ascend the stairway at the Capitol...he will pass a portrait of this lady. Pause a moment and look into the face of greatness.”

## *Legal Obligations*

In the Annual Accountability Report, the agency lists the laws applicable to it. Listed below is a summary of the information the agency provides.<sup>39</sup>

The Wil Lou Gray Opportunity School is primarily governed by Title 59, Chapter 51 of the S.C. Code of Laws. These statutes establish the school and enumerate the services to be provided by the school. The statutes also specify the school be managed by a board of trustees and include the powers, duties, and training required of the board members. In addition, there are several current budget provisos controlling school operations. Current budget Provisos 5.1 through 5.7 address programs for truant students, GED testing for students unable to remain enrolled in the school, certain funds to be carried forward into the next fiscal year, and revenues from federal grant money that may be retained.

## *Agency Organization and Employees*

### *Governing Body*

In the Program Evaluation Report, the Committee asks the agency to provide information about the agency’s governing body. The agency provides the information below.<sup>40</sup>

S.C. Code Ann. § 59-51-30:

The Wil Lou Gray Opportunity School is under the management and control of a board of twelve trustees, all of whom are elected by the General Assembly. The twelve trustees must be citizens of the State who are interested in the aims and ambitions of the school. Members of the board shall serve for terms of four years and until their successors are elected and qualify. The board shall elect a chairman and a vice chairman. In case a vacancy occurs on the board for any reason other than expiration of a term when the General Assembly is not in session, the Governor may fill it by appointment until the next session of the General Assembly, at which time a successor must be elected for the remainder of the unexpired term. Elections to fill vacancies which are caused for any reason other than expiration of a term may be held earlier than the first day of April of the year the vacancy is filled. A quorum of the board is seven members.

The current board members are listed in Table 5.<sup>41</sup>



Table 5. Wil Lou Gray Opportunity School board members (current as of July 10, 2019)

Board Member	Initial Election Date	Term Number	Current Term Expiration
Doris Adams	July 2012	2 <sup>nd</sup> Term	June 2020
Deborah Blalock	July 2015	2 <sup>nd</sup> Term	June 2023
Robert Collar	July 2015	2 <sup>nd</sup> Term	June 2023
Stewart Cooner (Vice-Chair)	July 2005	4 <sup>th</sup> Term	June 2021
Dan Dobson	May 2019	1 <sup>st</sup> Term	June 2023
Marilyn Edwards-Taylor	April 2018	1 <sup>st</sup> Term	June 2022
Bryan England	July 2000	5 <sup>th</sup> Term	June 2020
Thomas Hamilton	July 2010	3 <sup>rd</sup> Term	June 2022
Angela Hanyak	July 2017	1 <sup>st</sup> Term	June 2021
Russell Hart (Chair)	July 1994	7 <sup>th</sup> Term	June 2021
Michael Moss	July 2018	1 <sup>st</sup> Term	June 2021
Reginald Thomas	April 2016	1 <sup>st</sup> Term	June 2020

S.C. Code Ann. § 59-51-35, which became effective May 15, 2018, requires the following occur within one year of each board member of taking office:

All members of the board of trustees shall complete successfully a training program on the powers, duties, and responsibilities of a board member including, but not limited to, topics on policy development, personnel, school leadership and board relations, at-risk programs, finance, school law, ethics, and community relations, as determined by the board of trustees. Training also must be provided regarding how to best serve the at-risk students in their care.

#### *Agency Organizational Units*

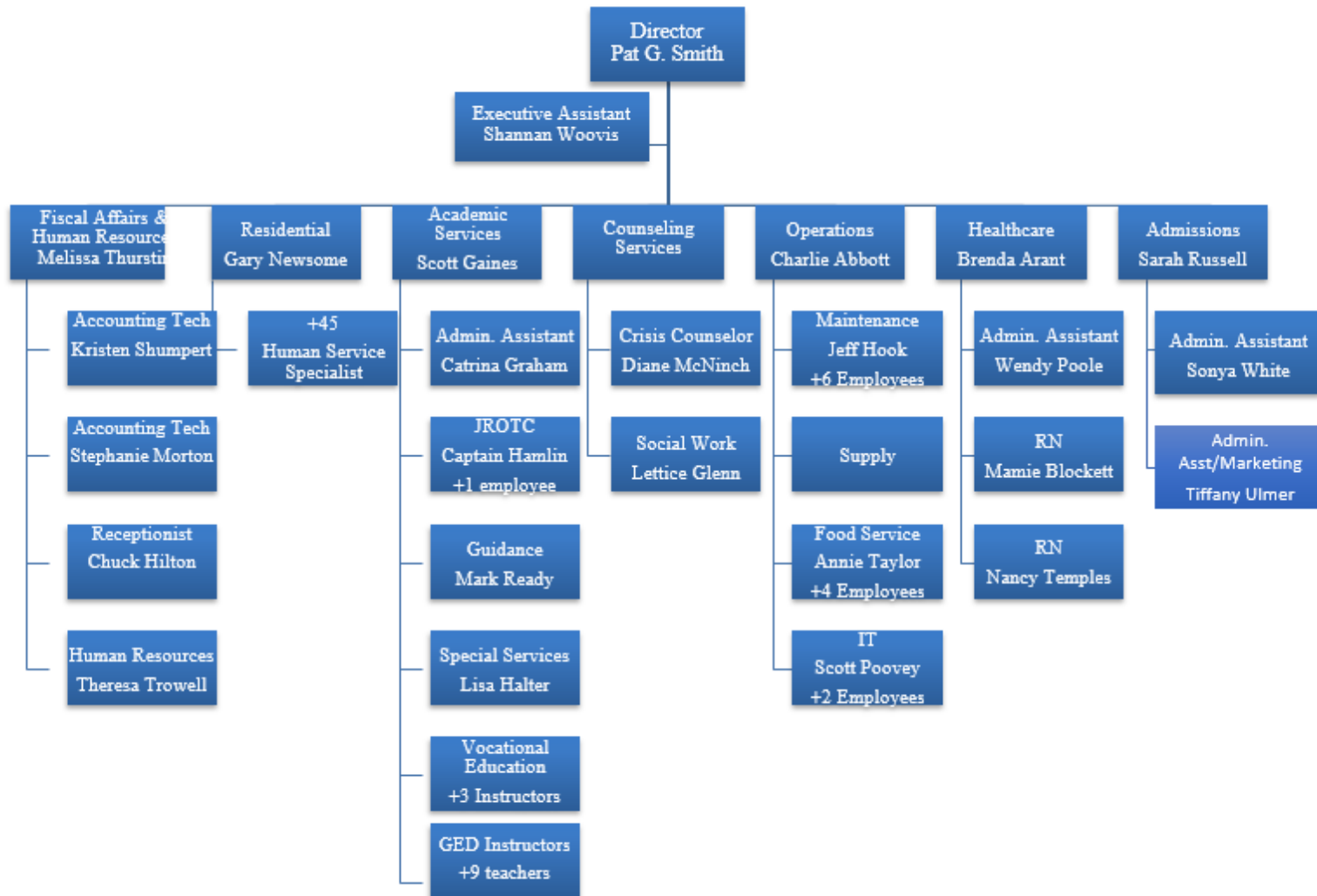
Every agency has an organization or hierarchy that is reflected in the agency's organizational chart. Within the organization are separate units. An agency may refer to these units as departments, divisions, functional areas, cost centers, etc. Each unit is responsible for contributing to the agency's ability to provide services and products.

During the study process, the Committee asks the agency about its organization and major operating programs.<sup>42</sup> Wil Lou Gray Opportunity School informs the Committee it is comprised of seven major organizational units referred to as divisions, which are described in Table 6. The organization of the agency is shown in Figure 4.

Table 6. Wil Lou Gray Opportunity School organizational units<sup>43</sup>

Organizational Unit	Fiscal Year	Average Number of Employees	Turnover Rate
ADMINISTRATION- supports all sections with agency leadership, finance, budgeting and human resources.	2015-16	6	0%
	2016-17	6	0%
	2017-18	6.58	15%
ADMISSIONS- reviews and interviews all applicants for compliance with the Admissions profile, and tracks students post-graduation.	2015-16	2	0%
	2016-17	2	50%
	2017-18	3	0%
ACADEMICS- includes the core GED classes, testing services, vocational education, media specialist, guidance counseling and the Principal.	2015-16	21.67	0%
	2016-17	20.67	5%
	2017-18	20.83	5%
MEDICAL- provides health services including counseling and nursing.	2015-16	12.67	63%
	2016-17	10.65	65%
	2017-18	9.92	40%
RESIDENTIAL SERVICES- support the mission by working directly with students to increase retention. Responsibilities include extracurricular activities, student mentoring and oversight.	2015-16	41.5	43%
	2016-17	41	25%
	2017-18	41.92	25%
SUPPORT SERVICES- supports all sections with procurement, cafeteria, and maintenance of all facilities.	2015-16	14.75	7%
	2016-17	14.92	7%
	2017-18	14.83	61%
INFORMATION TECHNOLOGY- provides support for all departments to ensure that network systems are operational and handled in the most efficient manner.	2015-16	2	0%
	2016-17	2.83	0%
	2017-18	3	0%

Organizational Chart



\*

Figure 4. Wil Lou Gray Opportunity School Organizational Chart (current as of January 2019)

### *Internal Audit Process*

In the Program Evaluation Report, the Committee asks the agency to provide information about its internal audit process, if it has one. The agency provides the information below.<sup>44</sup>

The School does not have a dedicated internal audit department. However, staff members perform reviews of processes throughout the year. These staff members report potential findings to the school’s director. The separation of duties has been implemented via SCEIS and follows Section 11-35-1230 of the South Carolina Code of Laws.

Periodic reviews are conducted covering fixed assets, expenditures, procurements, human resources and other areas as necessary. The Director of Finance and Human Resources reviews expenditures to monitor assets purchased and not properly classified, ensure compliance with state laws, rules and regulations and proper account classification. This position is also responsible for reviewing position descriptions to ensure compliance with federal laws, rules and regulations and other human resource transactions for proper documentation. The Director of Operations is responsible for reviewing procurements to ensure that the items received match the items ordered. Additionally, the Director of Operations is responsible for ensuring compliance with the Consolidated Procurement Code. Accordingly, the school does a thorough internal review of all processes, in addition to annual audits conducted by the State Auditor's Office and an annual review by the Division of State Human Resources, to supplant a dedicated internal audit staff.

### *Customers, Strategic Resources, and Performance*

The Wil Lou Gray Opportunity School provides alternative education in a quasi-military environment to South Carolina students between the ages of 16 and 19. To fulfill this purpose, Wil Lou Gray Opportunity School deploys its human and financial resources across its strategic plan. In its PER, the agency provides details about each strategic plan part. In tables 7 through 11, this information is organized by goal.<sup>45</sup>

#### *Goal 1: Provide productive educational services to students between the ages of 16 and 19.*

*Table 7. Goal one (Provide productive educational services to students between the ages of 16 and 19) 2017-18 FTEs and amount spent; 2018-19 FTEs and amount budgeted<sup>46</sup>*

Strategic Plan Part	2017-18		2018-19	
	Number of FTE Equivalents Utilized	Total Amount Spent	Number of FTE Equivalents Planned to Utilize	Total Amount Budgeted
Strategy 1.1: Maintain and evaluate testing outcomes annually	46.35	\$3,831,191	29.55	\$2,979,762
Strategy 1.2: Evaluate customer outreach upon graduation	7.16	\$531,965	4.89	\$491,427

Table 8. Goal one associated performance measures<sup>47</sup>

Performance Measure	Time Applicable		Goal in relation to Target?	Time Period #1	Time Period #2	Time Period #3	Time Period #4	Time Period #5	Time Period #6
GED success rate	July - June	Target:	Meet or obtain higher value	129	130	140	165	165	165
		Actual:		125*	155*	192	201	194	Not yet calculated
Monthly gains in Math Test of Adult Basic Education (TABE) results	Trimester	Target:	Meet or obtain higher value	16	16	15	20	20	20
		Actual:		16	14	18	18	18	Not yet calculated
Monthly gains in English Language Arts (ELA) TABE results	Trimester	Target:	Meet or obtain higher value	19	20	20	20	20	20
		Actual:		19	20	21	21	18	Not yet calculated
Provide Special Education Services per S.C. Department of Education Laws in compliance with student's Individualized Education Programs (IEP) or 504 plans	July - June	Target:	Meet exactly	100%	100%	100%	100%	100%	100%
		Actual:		100%	100%	100%	100%	100%	100%
Successful Bronze, Gold and Platinum WorkKeys Cards (i.e., assessment tool to measure career readiness) achieved	July - June	Target:	Meet or obtain higher value	85%	85%	85%	85%	85%	85%
		Actual:		82%	84%	85%	85%	73%	86%
Survey student success post GED graduation	July - June	Target:	Meet or obtain higher value	DNE	DNE	DNE	DNE	75%	75%
		Actual:		DNE	DNE	DNE	DNE	62%	Not yet calculated

\*Green shading indicates the agency achieves or exceeds its goal as it relates to the measure. Red shading indicates the agency does not achieve its goal as it relates to the measure.

**Goal 2: Enroll and retain student population for each 14-week session**

Table 9. Goal two (Enroll and retain student population for each 14-week session) 2017-18 FTEs and amount spent; 2018-19 FTEs and amount budgeted<sup>48</sup>

Strategic Plan Part	2017-18		2018-19	
	Number of FTE Equivalents Utilized	Total Amount Spent	Number of FTE Equivalents Planned to Utilize	Total Amount Budgeted
Strategy 2.1: Increase student enrollment through enhanced marketing techniques	14.33	\$1,063,930	9.78	\$982,855
Strategy 2.2: Monitor and retain student enrollment through admissions profiling	19.05	\$1,584,580	26.74	\$2,703,118

Table 10. Goal two associated performance measures<sup>49</sup>

Performance Measure	Time Applicable		Goal in relation to Target?	Time Period #1	Time Period #2	Time Period #3	Time Period #4	Time Period #5	Time Period #6
Capture student referrals by applications	July - June	Target:	Meet or obtain higher value	DNE	DNE	100%	100%	DNE	100%
		Actual:		56%	77%	85%	53%	DNE	Not yet calculated
Counties served	July - June	Target:	Meet or obtain higher value	46	46	46	46	46	46
		Actual:		70%	89%	93%	93%	85%	Not yet calculated
Monitor student enrollment	July - June	Target:	Meet exactly	349	450	420	383	383	383
		Actual:		342	385	431	399	354	Not yet calculated
Provide weekly counseling services to all students	July - June	Target:	Meet exactly	DNE	100%	100%	100%	100%	100%
		Actual:		DNE	100%	100%	100%	100%	100%

\*Green shading indicates the agency achieves or exceeds its goal as it relates to the measure. Red shading indicates the agency does not achieve its goal as it relates to the measure.

**Goal 3: Maintain human resources standards to meet the overall mission of the Opportunity School**

Table 11. Goal three (Maintain human resources standards to meet the overall mission of the Opportunity School) 2018-19 FTEs and amount budgeted<sup>50</sup>

Strategic Plan Part	2017-18		2018-19	
	Number of FTE Equivalents Utilized	Total Amount Spent	Number of FTE Equivalents Planned to Utilize	Total Amount Budgeted
Strategy 3.1: Provide quality working environment to promote healthy employee retention	N/A	N/A	6.93	\$690,072
Strategy 3.2: Provide effective staff	N/A	N/A	9.14	\$916,988

Goal 3 is new and does not yet have associated performance measures

## Key Federal and Local Partners

During the study of an agency, the **Committee asks the agency if there are federal or local entities serving similar customers or providing similar products or services.** The Committee asks how the agencies work together to effectively and efficiently achieve the agency’s goals. Wil Lou Gray Opportunity School lists the following key federal and local partners.<sup>51</sup>

Table 11. WLGOS partners

Name of Partner Entity	Description of Partnership
S.C. Department of Education	Define education guidelines for the academic department, including Office for Exceptional Children
S.C. Vocational Rehabilitation	Provide additional assistance in job training skills for those students who qualify
Lexington County School District II	GED and WorkKeys testing services
S.C. Middle & High Schools, S.C. Private Schools, and S.C. DJJ	Collaborative efforts to disseminate school records for admission to Wil Lou Gray Opportunity School
USDA	National School Lunch and Breakfast Program
S.C. DSS	Coordinate student placement and subsequent meetings
National Safety Council	Forklift driver training
University of South Carolina, Columbia International University, South University, and Webster University	Counseling internships
Cayce-West Columbia Jaycees	Provide retail work experiences
Lexington County Recreation Commission	Team recreational opportunities
Cayce-West Columbia Chamber of Commerce, S.C. School Boards Association, and S.C. Association of School Administrators	Marketing exposure
Occupational Safety Hazard Association	OSHA 10 safety training
Council for Exceptional Children	Updates on best practices for our special needs population
S.C. DHEC	Monitors food service operation and health care



## APPENDIX B. AGENCY REPORTS TO COMMITTEE

During the legislative oversight process, the **Committee asks the agency to conduct self-analysis** by requiring it to complete and submit annual Restructuring Reports, a Seven-Year Plan for cost savings and increased efficiencies, and a Program Evaluation Report. The Committee posts each report on the agency page of the Committee's website.

### *Seven-Year Plan for Cost Savings and Increased Efficiencies*

S.C. Code Ann. § 1-30-10 requires agencies to submit "a seven year plan that provides initiatives and/or planned actions that implement cost savings and increased efficiencies of services and responsibilities within the projected seven-year period."<sup>52</sup> Wil Lou Gray Opportunity School submits its plan on March 11, 2015.<sup>53</sup>

### *Restructuring Report*

The Annual Restructuring Report fulfills the requirement in S.C. Code Ann. § 1-30-10(G)(1) that annually each agency report to the General Assembly "detailed and comprehensive recommendations for the purposes of merging or eliminating duplicative or unnecessary divisions, programs, or personnel within each department to provide a more efficient administration of government services." The report, at a minimum, includes information in the following areas - history, mission and vision, laws, strategic plan, human and financial resources, performance measures, and restructuring recommendations.

Wil Lou Gray Opportunity School submits its first Annual Restructuring Report on March 11, 2015.<sup>54</sup> The agency's 2017-18 Annual Accountability Report to the Governor and General Assembly, which it submits in September 21, 2018, serves as its most recent Annual Restructuring Report.<sup>55</sup>

### *Program Evaluation Report*

When an agency is selected for study, the Committee may acquire evidence or information by any lawful means, including, but not limited to, "requiring the agency to prepare and submit to the investigating committee a program evaluation report by a date specified by the investigating committee." S.C. Code Ann. § 2-2-60 outlines what an investigating committee's request for a program evaluation report must contain. Also it provides a list of information an investigating committee may request. The Committee sends guidelines for the Wil Lou Gray Opportunity School's Program Evaluation Report (PER) on July 17, 2018. The agency submits its report on November 19, 2018.<sup>56</sup>

The PER includes information in the following areas - agency snapshot, agency legal directives, strategic plan and resources, performance, agency ideas/recommendations, and additional documents. The **Program Evaluation Report serves as the base document for the Subcommittee's study of the agency.**

## APPENDIX C. PUBLIC INPUT

**Public input is a cornerstone of the House Legislative Oversight Committee’s process.**<sup>57</sup> Members of the public have an opportunity to participate anonymously in a public survey, provide comments anonymously via a link on the Committee’s website, and appear in person before the Committee.<sup>58</sup> During the study, media articles related to the agency are compiled for member review.

### *Public Survey*

From July 17, 2018 - August 20, 2018, the Committee posts an **online survey to solicit comments from the public about the Wil Lou Gray Opportunity School** and four other agencies. The Committee sends information about this survey to all House members to forward to their constituents. Additionally, in an effort to communicate this public input opportunity widely, the Committee issues a statewide media release.<sup>59</sup> The media release is shared with the South Carolina State Library, which disseminates it to local libraries across the state.

There are 1,485 responses to the survey, with 85 respondents providing input about WLGO. The responses relating to the agency come from 24 of South Carolina’s 46 counties.<sup>60</sup> These comments are not considered testimony.<sup>61</sup> As the survey press release notes, “input and observations from people who interact with these agencies are important because they may help direct the Committee to potential areas for improvement with these agencies.”<sup>62</sup> Survey results are posted on the Committee’s website. The **public is informed it may continue to submit written comments about agencies online** throughout the study.<sup>63</sup>

Of those survey participants that respond to questions related to WLGO, **80% have a positive or very positive opinion of the agency.**<sup>64</sup> Over 55% of the public survey respondents base their opinions of the agency on personal, family member, friend, neighbor, or colleague experiences with the agency. **The comments vary, including statements about staff compensation and opportunities for feedback, GED success rates, sources of potential students, and an outmoded style of education.**<sup>65</sup>

### *Public Input via Committee Website*

Throughout the course of the study, people are able to submit comments anonymously on the Committee website. The Committee posts comments verbatim to the website, but they are not the comment or expression of the House Legislative Oversight Committee, any of its Subcommittees, or the House of Representatives.<sup>66</sup> The Committee receives one comment, and it is about the board’s interaction with the director regarding employee complaints.

### *Public Input via In-Person Testimony*

During the study, the Committee offers the opportunity for the public to appear and provide sworn testimony.<sup>67</sup> A press release announcing this opportunity is sent to media outlets statewide on January 2, 2019.<sup>68</sup> The media release is also shared with the South Carolina State Library, which disseminates it to local libraries across the state. The Committee holds a meeting dedicated to public input about the Wil Lou Gray Opportunity School and other agencies on January 14, 2019.<sup>69</sup> Further detail on the public input meeting is in the [Meetings Regarding the Agency](#) section of this report.

## APPENDIX D. RECOMMENDATION RECEIVED FOR INFORMATION PURPOSES

In its Program Evaluation Report, the agency is asked to provide recommendations for changes at the agency that may improve the agency's efficiency and outcomes.<sup>70</sup> The agency provides one recommendation for internal changes that is at the idea stage when the report is submitted. The Subcommittee receives the recommendation for information purposes only.<sup>71</sup>

Under discussion and at the idea stage, is the thought of a reward/incentive program through a small monetary stipend to promote student success upon completion of their GED. The basic concept is that if a student, within 6 months of attaining their GED, chooses one of three career paths they would be eligible for the modest reward/incentive program. The basic outline of the program is as follows. A GED graduate selects one of three career paths:

- 1) Completes 90 days of continuous employment.
- 2) Completes one full semester of post-secondary education.
- 3) Successful enlistment and reporting to duty station at the end of basic training in one of the military service branches.

This concept is under development to determine the feasibility for implementation. Requiring much collaboration to shape this thought for the obvious factors of the approximate cost \$7500 to \$10,000 to incentivize the program, cost to provide staff oversight and design a follow-up mechanism to ensure eligibility and successful completion of their career option.

# CONTACT INFORMATION

## Committee Contact Information

### Physical:

South Carolina House of Representatives  
Legislative Oversight Committee  
1105 Pendleton Street, Blatt Building Room 228

### Mailing:

Post Office Box 11867  
Columbia, South Carolina 29211

Telephone: 803-212-6810

### Online:

You may visit the South Carolina General Assembly Home Page (<http://www.scstatehouse.gov>) and click on "Citizens' Interest" then click on "House Legislative Oversight Committee Postings and Reports". This will list the information posted online for the Committee; click on the information you would like to review. Also, a direct link to Committee information is <http://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee.php>.

## Agency Contact Information

### Address:

Wil Lou Gray Opportunity School  
3300 W. Campus Rd  
West Columbia, SC 29170

### Telephone:

803-896-6480

### Online:

<https://www.willougray.org/>

# ENDNOTES

<sup>1</sup> Visual Summary Figure 1 is compiled from information in the Department of Archives and History study materials available online under "Citizens' Interest," under "House Legislative Oversight Committee Postings and Reports," and then under "Department of Archives and History" <http://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyPHPFiles/ArchivesandHistory.php> (accessed May 23, 2017).

<sup>2</sup> Act 34 of 1957. The school was founded by Dr. Wil Lou Gray in Oconee County in 1921. In 1947, the federal government conveyed land in Lexington County to be used for a multiple education institution, which included the South Carolina Opportunity School.

<sup>3</sup> Act 376 of 1969.

<sup>4</sup> Act 526 of 1976. Dr. Wil Lou Gray served as director of the school for 36 years.

<sup>5</sup> Act 299 of 1992.

<sup>6</sup> Act 194 of 2018, § 1.

<sup>7</sup> Act 194 of 2018, § 2.

<sup>8</sup> S.C. House of Representatives, House Legislative Oversight Committee, "Meeting Minutes" (June 11, 2019), under "Committee Postings and Reports," under "House Legislative Oversight Committee," under "Wil Lou Gray Opportunity School," and under "Meetings," [[specific meeting minutes URL](#)] (accessed [[date of most recent visit to link](#)]). A video of the meeting is available at <https://www.scstatehouse.gov/video/archives.php?key=9692&part=1>. Hereinafter, "June 11, 2019 Minutes and Video."

<sup>9</sup> S.C. Code Ann. § 59-51-35.

<sup>10</sup> S.C. House of Representatives, House Legislative Oversight Committee, Letter from Agency to Subcommittee (February 11, 2019), under "Committee Postings and Reports," under "House Legislative Oversight Committee," under "Wil Lou Gray Opportunity School," and under "Correspondence," <https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/WilLouGray/WLGOS%20Response%20to%20February%205%20Letter.PDF> (accessed June 11, 2019). Hereinafter "February 11, 2019 Letter."

<sup>11</sup> S.C. House of Representatives, House Legislative Oversight Committee, Letter from Agency to Subcommittee (June 3, 2019), under "Committee Postings and Reports," under "House Legislative Oversight Committee," under "Wil Lou Gray Opportunity

---

School,” and under “Correspondence,”

<https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/WilLouGray/WLGOS%20Response%206%203%2019.PDF> (accessed June 11, 2019). Hereinafter “June 3, 2019 Letter.”

<sup>12</sup> S.C. General Assembly, College and University Trustee Screening Commission, “Transcript of Screening Hearing on March 25, 2019 (April 23, 2019) under “Committee Postings and Reports,” under “College and University Trustee Screening Commission,” and under “Screening Reports and Transcripts,”

<https://www.scstatehouse.gov/CommitteeInfo/Universities&CollegesScreeningCommittee/Transcripts/March%2025,%202019.pdf> (accessed June 11, 2019).

<sup>13</sup> June 11, 2019 Minutes and Video (50-minute mark of video).

<sup>14</sup> S.C. House of Representatives, House Legislative Oversight Committee, Letter from Agency to Subcommittee (March 18, 2019),” under “Committee Postings and Reports,” under “House Legislative Oversight Committee,” under “Wil Lou Gray Opportunity School,” and under “Correspondence,”

<https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/WilLouGray/WLGOS%20Response%20to%203%206%20Letter.PDF> (accessed June 11, 2019). Hereinafter “March 18, 2019 Letter.”

<sup>15</sup> S.C. House of Representatives, House Legislative Oversight Committee, “Meeting Minutes” (February 12, 2019), under “Committee Postings and Reports,” under “House Legislative Oversight Committee,” under “Wil Lou Gray Opportunity School,” and under “Meetings,”

<https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/SubcommitteeMinutes/EducationSub/Meeting%20Minutes%202%2012%2019.pdf> (accessed June 11, 2019). A video of the meeting is available at

<https://www.scstatehouse.gov/video/archives.php?key=8829&part=1>. Hereinafter, “February 12, 2019 Minutes and Video.”

<sup>16</sup> 20 U.S.C. § 1232g and 34 CFR Part 99. Also see the U.S. Department of Education’s explanation of the law at <https://www2.ed.gov/policy/gen/guid/fpco/faq.html#q1>.

<sup>17</sup> February 11, 2019 Letter.

<sup>18</sup> United States Census Bureau, “About Hispanic Origin” under “Topics,” under “Population,” under “Hispanic Origin” and under “About,” <https://www.census.gov/topics/population/hispanic-origin/about.html> (accessed June 11, 2019). Also see the U.S. Census Bureau’s single page explanation of race and ethnicity at <https://www.census.gov/mso/www/training/pdf/race-ethnicity-onepager.pdf>.

<sup>19</sup> February 11, 2019 Letter.

<sup>20</sup> June 3, 2019 Letter.

<sup>21</sup> U.S. Army Junior ROTC, “Cadet Command Regulation 145-2” under “About JROTC,” under “Program Information,” and under “U.S. Codes and Regulations” [http://www.usarmyjrotc.com/doc/public/jrotcProgram/reg/CadetCommandRegulation\\_145-2\\_1Feb2012.pdf](http://www.usarmyjrotc.com/doc/public/jrotcProgram/reg/CadetCommandRegulation_145-2_1Feb2012.pdf) (accessed June 11, 2019).

<sup>22</sup> June 3, 2019 Letter.

<sup>23</sup> June 11, 2019 Meeting.

<sup>24</sup> S.C. Code Ann. § 2-2-10(1).

<sup>25</sup> S.C. House of Representatives, House Legislative Oversight Committee, “Meeting Minutes” (May 3, 2018), under “Committee Postings and Reports,” under “House Legislative Oversight Committee,” under “Wil Lou Gray Opportunity School,” and under “Meetings,”

[https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/FullCommitteeMinutes/5.3.18\\_Meeting\\_Minutes\\_Full\\_LOC.pdf](https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/FullCommitteeMinutes/5.3.18_Meeting_Minutes_Full_LOC.pdf) (accessed June 11, 2019). A video of the meeting is available at

<https://www.scstatehouse.gov/video/archives.php?key=8173&part=1>.

<sup>26</sup> S.C. House of representatives, House Legislative Oversight Committee, “Subcommittees -2019,” under “Committee Information,” under “House Legislative Oversight Committee,”

[https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/Subcommittees\\_2019.pdf](https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/Subcommittees_2019.pdf).

<sup>27</sup> Ibid. and S.C. House of representatives, House Legislative Oversight Committee, “Subcommittees -2018,” under “Committee Information,” under “House Legislative Oversight Committee,”

[https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/Subcommittee\\_2018\\_71518.pdf](https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/Subcommittee_2018_71518.pdf).

<sup>28</sup> A brochure about the House Legislative Oversight’s Committee process is available online. Also, there are ongoing opportunities to request notification when meetings are scheduled and to provide feedback about state agencies under study that can be found online.

<https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/Brochure%202019-2020%20Session.pdf> (accessed July 11, 2019).

<sup>29</sup> S.C. House of Representatives, House Legislative Oversight Committee.

<http://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee.php> (accessed July 10, 2017).

<sup>30</sup> May 3, 2018 Meeting Minutes and Video.

<sup>31</sup> S.C. House of Representatives, House Legislative Oversight Committee, “Meeting Minutes” (January 14, 2019), under “Committee Postings and Reports,” under “House Legislative Oversight Committee,” under “Wil Lou Gray Opportunity School,” and under “Meetings,”

---

<https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyPHPFiles/WilLouGrayOpportunitySchool.php> (accessed June 11, 2019). A video of the meeting is available at

<https://www.scstatehouse.gov/video/archives.php?key=8651&part=1>.

<sup>32</sup> S.C. House of Representatives, House Legislative Oversight Committee, “Meeting Minutes” (January 31, 2019), under “Committee Postings and Reports,” under “House Legislative Oversight Committee,” under “Wil Lou Gray Opportunity School,” and under “Meetings,”

[https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/WilLouGray/Meeting%20Minutes%201\\_31\\_19.pdf](https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/WilLouGray/Meeting%20Minutes%201_31_19.pdf) (accessed June 11, 2019). A video of the meeting is available at

<https://www.scstatehouse.gov/video/archives.php?key=8868&part=1>. Hereinafter January 31, 2019 Meeting Minutes and Video.

<sup>33</sup> February 12, 2019 Meeting Minutes and Video.

<sup>34</sup> S.C. House of Representatives, House Legislative Oversight Committee, “Meeting Minutes” (February 28, 2019), under “Committee Postings and Reports,” under “House Legislative Oversight Committee,” under “Wil Lou Gray Opportunity School,” and under “Meetings,”

[https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/SubcommitteeMinutes/EducationSub/Meeting%20Minutes%202\\_28\\_19.pdf](https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/SubcommitteeMinutes/EducationSub/Meeting%20Minutes%202_28_19.pdf) (accessed June 11, 2019). A video of the meeting is available at

<https://www.scstatehouse.gov/video/archives.php?key=8868&part=1>. Hereinafter, “February 28, 2019 Minutes and Video.”

<sup>35</sup> S.C. House of Representatives, House Legislative Oversight Committee, “Meeting Minutes” (March 21, 2019), under “Committee Postings and Reports,” under “House Legislative Oversight Committee,” under “Wil Lou Gray Opportunity School,” and under “Meetings,”

[https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/SubcommitteeMinutes/EducationSub/Meeting%20Minutes%202\\_28\\_19.pdf](https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/SubcommitteeMinutes/EducationSub/Meeting%20Minutes%202_28_19.pdf) (accessed June 11, 2019). A video of the meeting is available at

<https://www.scstatehouse.gov/video/archives.php?key=8833&part=1>. Hereinafter, “March 21, 2019 Minutes and Video.”

<sup>36</sup> June 11, 2019 Meeting Minutes and Video.

<sup>37</sup> Committee Standard Practice 12.

<sup>38</sup> Wil Lou Gray Opportunity School, “Program Evaluation Report (2018),” under “Committee Postings and Reports,” under “House Legislative Oversight Committee,” under “Wil Lou Gray Opportunity School,”

[https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/WilLouGray/PER\\_Final%20PDF.PDF](https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/WilLouGray/PER_Final%20PDF.PDF) (accessed June 14, 2019). Hereinafter, “Agency PER.” See p. 20.

<sup>39</sup> 2017-2018 Agency Accountability Report, Legal Standards Chart.

<sup>40</sup> Agency PER, Agency Legal Directives, Plan & Resources, Question # 7.

<sup>41</sup> South Carolina Secretary of State, “Wil Lou Gray Opportunity School Board of Trustees,” under “Boards and Commissions Search,” [http://search.scsos.com/boards\\_commissions/default.aspx](http://search.scsos.com/boards_commissions/default.aspx) (accessed June 11, 2019).

<sup>42</sup> Agency PER.

<sup>43</sup> Ibid.

<sup>44</sup> Agency PER, Agency Legal Directives, Plan & Resources, Question # 8.

<sup>45</sup> Agency PER, Performance Measures and Comprehensive Strategic Plan Summary.

<sup>46</sup> Ibid.

<sup>47</sup> Ibid.

<sup>48</sup> Ibid.

<sup>49</sup> Ibid.

<sup>50</sup> Ibid.

<sup>51</sup> Annual Accountability Report, Partner Template

<sup>52</sup> S.C. Code Ann. § 1-30-10.

<sup>53</sup> Wil Lou Gray Opportunity School, “Restructuring and Seven-Year Plan Report (March 11, 2015),” under “Committee Postings and Reports” under “House Legislative Oversight Committee,” and under “Wil Lou Gray Opportunity School”

<https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/2015AgencyRestructuringandSevenYearPlanReports/2015%20Wil%20Lou%20Gray%20Opportunity%20School.pdf> (accessed June 17, 2019). Hereinafter, “Agency Restructuring and Seven-Year Plan Report.”

<sup>54</sup> Agency Restructuring and Seven-Year Plan Report.

<sup>55</sup> Wil Lou Gray Opportunity School, “Agency Accountability Report (2017-2018),” under “Committee Postings and Reports” under “House Legislative Oversight Committee,” and under “Wil Lou Gray Opportunity School”

<https://www.scstatehouse.gov/reports/aar2018/H710.pdf> (accessed June 17, 2019). Hereinafter, “Agency Annual Accountability Report.”

<sup>56</sup> Agency PER.

<sup>57</sup> A brochure about the House Legislative Oversight’s Committee process is available online. Also, there are ongoing opportunities to request notification when meetings are scheduled and to provide feedback about state agencies under study that can be found online.

---

<https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/Brochure%202019-2020%20Session.pdf> (accessed July 11, 2019).

<sup>58</sup> S.C. House of Representatives, House Legislative Oversight Committee.

<http://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee.php> (accessed July 10, 2019).

<sup>59</sup> S.C. House of Representatives, House Legislative Oversight Committee, “Press Release announcing Public Survey (July 17, 2018),” under “Committee Postings and Reports,” under “House Legislative Oversight Committee,” under “Wil Lou Gray Opportunity School,” and under “Public Survey and Public Input,”

<https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyPHPFiles/AdjutantGeneral.php> (accessed June 13, 2019). Hereinafter, “Press Release announcing Public Survey.”

<sup>60</sup> S.C. House of Representatives, House Legislative Oversight Committee, “Survey Results (July 17 – August 20, 2018),” under “Committee Postings and Reports,” under “House Legislative Oversight Committee,” under “Wil Lou Gray Opportunity School,” and under “Public Survey and Public Input,”

[https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/Corrections/Public\\_Survey\\_JulAug2018.PDF](https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/Corrections/Public_Survey_JulAug2018.PDF) (accessed July 22, 2019). Hereinafter “Results of July 2018 Survey.”

<sup>61</sup> Committee Standard Practice 10.4.

<sup>62</sup> Survey press release.

<sup>63</sup> S.C. House of Representatives, House Legislative Oversight Committee, “Press Release Inviting the Public to Provide Testimony (January 2, 2019),” under “Committee Postings and Reports,” under “House Legislative Oversight Committee,” under “Wil Lou Gray Opportunity School,” and under “Public Survey and Public Input,”

[https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/Corrections/Press\\_Release\\_Jan2019.pdf](https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/Corrections/Press_Release_Jan2019.pdf) (accessed June 13, 2019). Hereinafter, “Press Release Inviting Public Testimony.”

<sup>64</sup> Results of July 2018 Survey.

<sup>65</sup> Ibid.

<sup>66</sup> Committee Standard Practice 10.4.5 allows for the redaction of profanity.

<sup>67</sup> Also, the chair of either the Committee or Education and Cultural Subcommittee has the discretion to allow testimony during meetings.

<sup>68</sup> Press Release Inviting Public Testimony.

<sup>69</sup> January 14, 2019 Minutes and Video.

<sup>70</sup> Agency PER, Agency Ideas/Recommendations.

<sup>71</sup> June 11, 2019 Meeting Minutes and Video.