
Abbeville v. The State of South Carolina, et al.

Evidence The Court Must Consider: Demographics

- ❑ Counties, districts and students
- ❑ Why? Because not all students are created equally
- ❑ The State Constitution requires the State to offer *each* child an adequate educational opportunity
- ❑ Some children require additional academic assistance, which is rarely disputed

Key Idea: Each child must be given an adequate educational opportunity and that child's individual needs must be addressed.

Evidence The Court Must Consider: Demographics

- ❑ Children born into impoverished families by definition are “at risk” for educational failure
- ❑ The State must design and support programs for “at risk” children
- ❑ The State has never offered “at risk” children in the Plaintiff districts the resources they require to have educational opportunities

Key Idea: The State has not adequately addressed “at risk” students.

How Does The Court Determine Whether The State Is Offering Educational Opportunities To Children In The Plaintiff districts

- ❑ The Court must examine both State inputs and student outcomes
- ❑ Inputs define educational opportunity
 - What educational offerings and resources are offered children in the Plaintiff districts?
 - Do they offer the students “a good chance for advancement or progress” as “opportunity” is defined in *Webster’s Dictionary*?
 - The evidence should convince the Court that the State has failed to offer required educational resources and support to provide educational opportunities to children in the Plaintiff districts.

Key Idea: The Court should consider carefully what the State offers in educational programs and supports and whether it is sufficient.

How Does The Court Determine Whether The State Is Offering Educational Opportunities To Children In The Plaintiff districts – The Litmus Test

- Outcomes measure student achievement
 - They tell you whether the State is educating its children.
 - The Plaintiffs do not believe that the State will seriously argue that children in the Plaintiff districts are receiving an adequate education, no matter how defined.
 - Rather, the State contends that children in the Plaintiff districts choose not to learn.
 - The State asked this Court to adopt a finding that, because 40% of students in the Plaintiff districts are minimally qualified to advance to the next grade level, it proves that the opportunity exists for all.
 - The State's contention that 60% of 9-13 year old children refuse to learn is shameful.
 - We expect the State to continue in this posture throughout trial.

Key Idea: The State essentially concedes that the majority of students are failing State standards, but maintains that it is meeting its obligation to these children.

Legal Issues The Court Must Decide

- ❑ This case does not come to us on a blank slate
- ❑ In addition to adequate and safe facilities, the legislature must provide each child the opportunity to acquire
 - a “minimally adequate education,” which the Supreme Court broadly outlined as:
 - ❑ The ability to read, write, and speak the English language, and knowledge of mathematics and physical science;
 - ❑ A fundamental knowledge of economic, social, and political systems, and of history and governmental processes; and
 - ❑ Academic and vocational skills

Key Idea: We now have a roadmap to follow and not the bare language of Article 3, Section XI.

Legal Issues The Court Must Decide

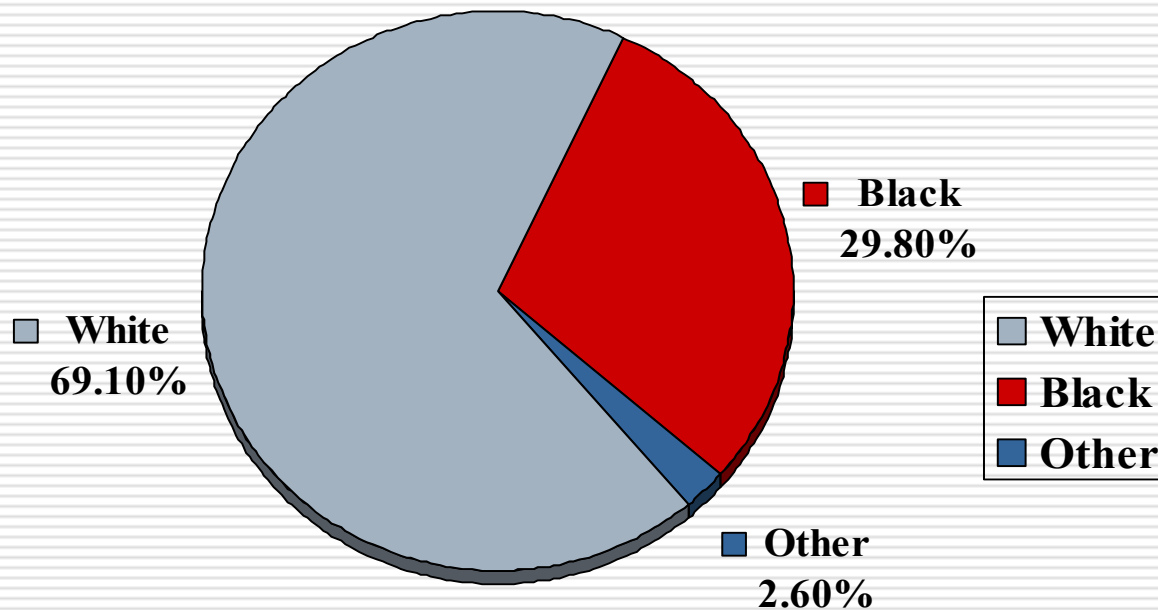
- The questions this Court must now answer are:
 - What is a “minimally adequate education”?
 - What constitutes an “opportunity”?
 - How does the Court determine whether the students have the opportunity to obtain the knowledge and skills outlined in *Abbeville*?

Key Idea: Ample evidence will be introduced to assist the Court. The Court will not be forced to decide the case without guidance.

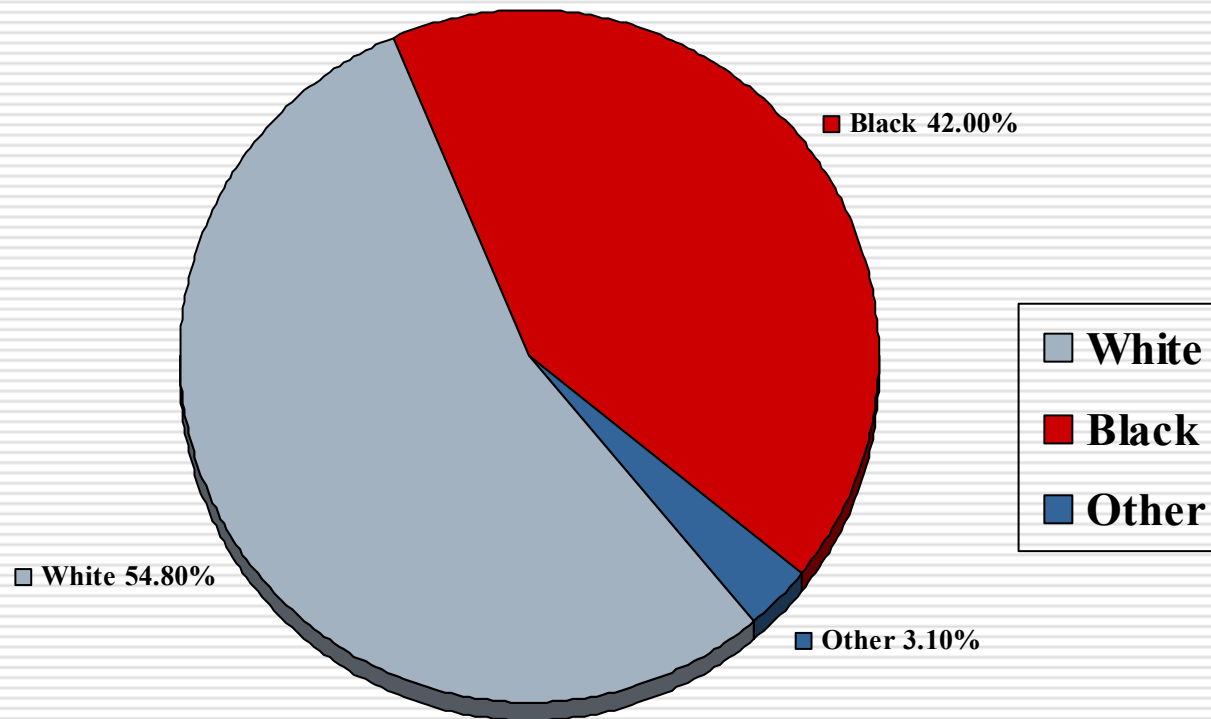
Part 1

Demographics
State and Plaintiff districts

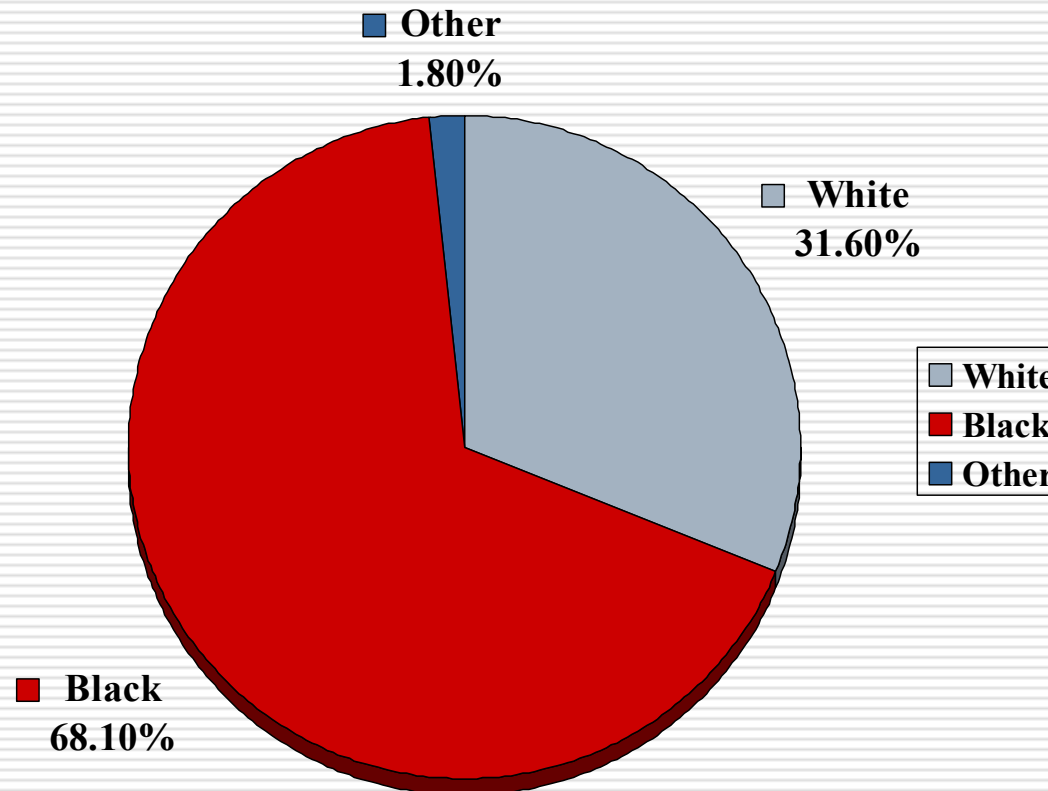
South Carolina Profile Ethnicity, 1999



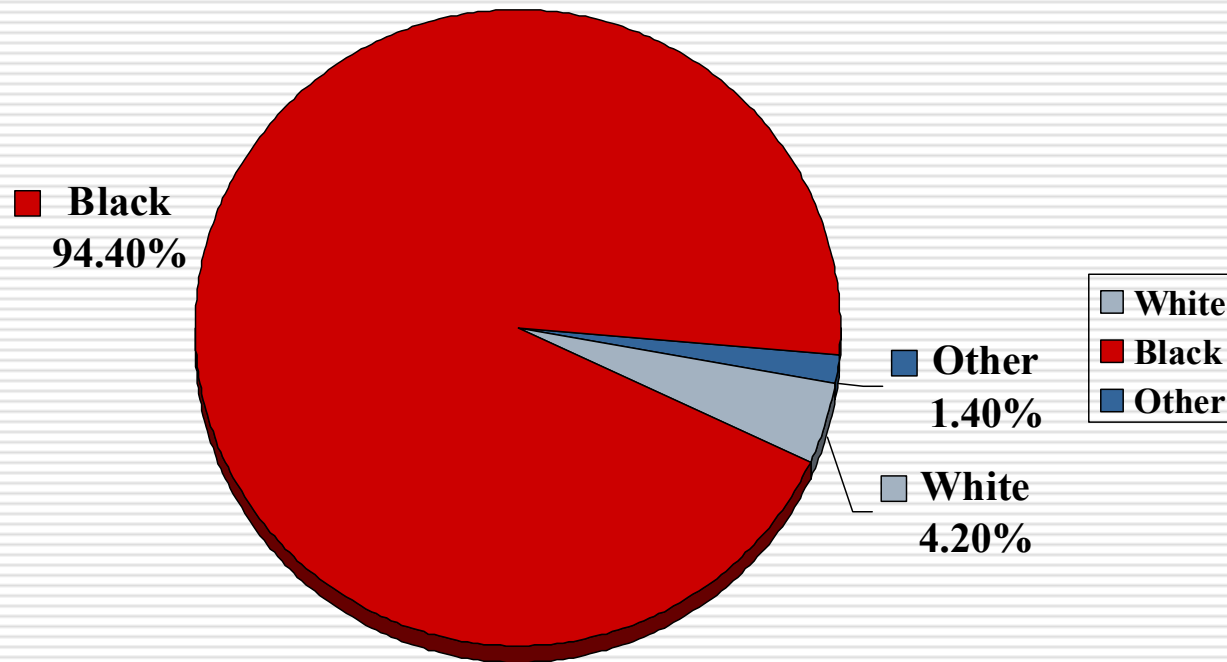
South Carolina Education Profile Student Ethnicity, 1999



Allendale County Profile: Ethnicity, 1999



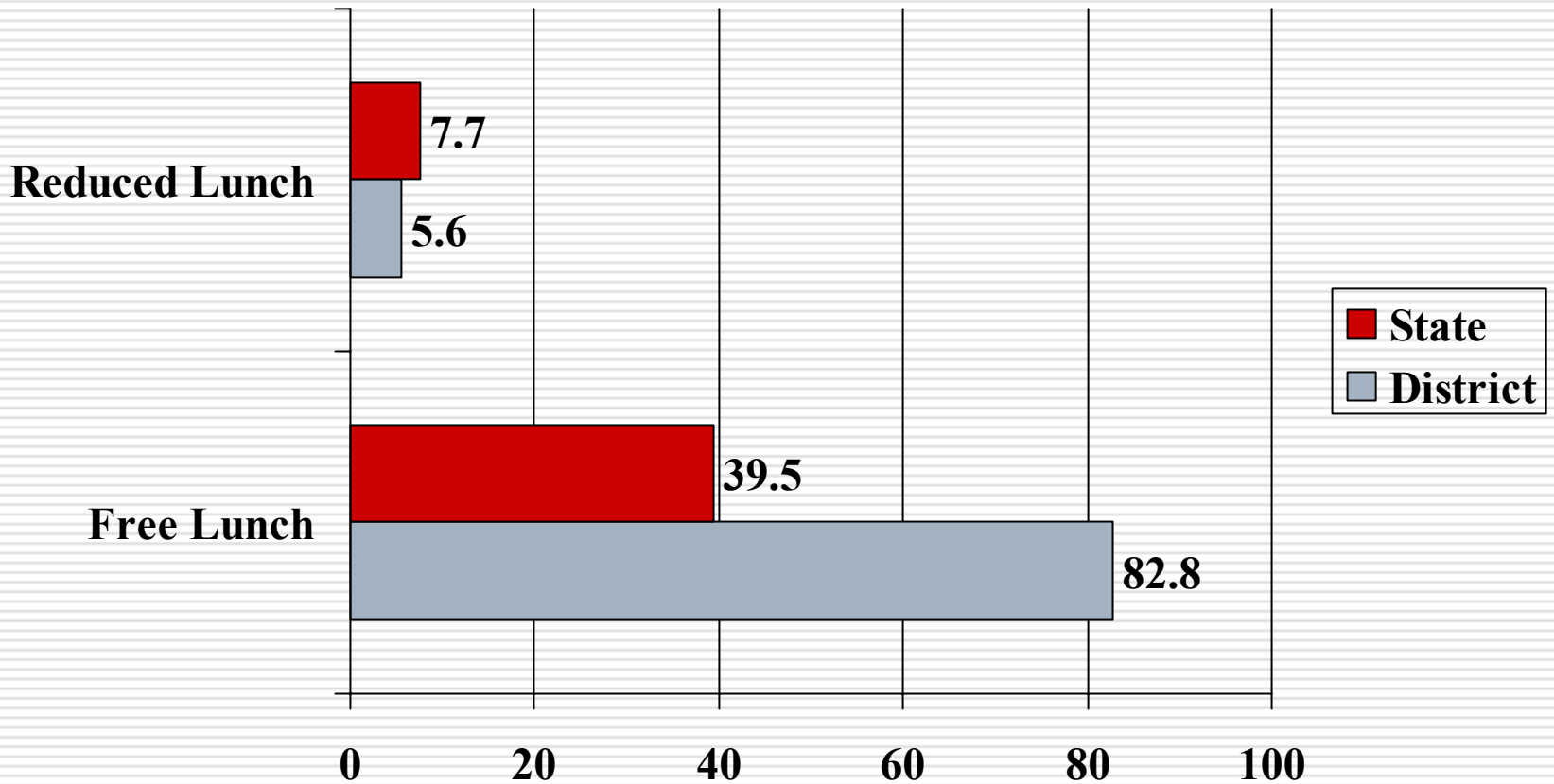
Allendale County Education Profile: Student Ethnicity, 1999



Allendale County Profile: Financial

1999 Average Selling Price of Homes	Allendale County	State of South Carolina
	\$22, 018	\$128,055
1999 Per Capita Income	\$17,321	\$23,538
Below Poverty	35.8%	15.4%

Allendale District Profile



Allendale District Profile

☐ AP (Advanced Placement) Exams

- Administered = 13
- Scoring 3 or Higher = 0%

☐ SAT

- Average Score = 419V / 411M
- Average Score (State) = 486V / 488M

☐ Graduation Rate

- Class of 1999/2000 = 40%*

(*Information from National Center for Educational Statistics)

PACT Performance Levels

Below Basic

A student who performs at the Below Basic level on the PACT has not met minimum expectations for student performance based on the curriculum standards approved by the State Board of Education. The student is not prepared for work at the next grade and must have an academic assistance plan; local district board policy will determine the student's promotion to the next grade level.

Basic

Performance at the Basic level means a student has passed the test. A student who performs at the Basic level at the PACT has met minimum expectations for student performance based on the curriculum standards approved by the State Board of Education. The student is minimally prepared for work at the next grade.

Proficient

A student who performs at the Proficient level on the PACT has met expectations for student performance based on the curriculum standards approved by the State Board of Education. The student is well prepared for work at the next grade. The Proficient level represents the long-term goal for student performance in South Carolina.

Advanced

A student who performs at the Advanced level on the PACT has exceeded expectations for student performance based on the curriculum standards approved by the State Board of Education. The student is very well prepared for work at the next grade.

Allendale 2002 PACT Test Scores

English/Language Arts

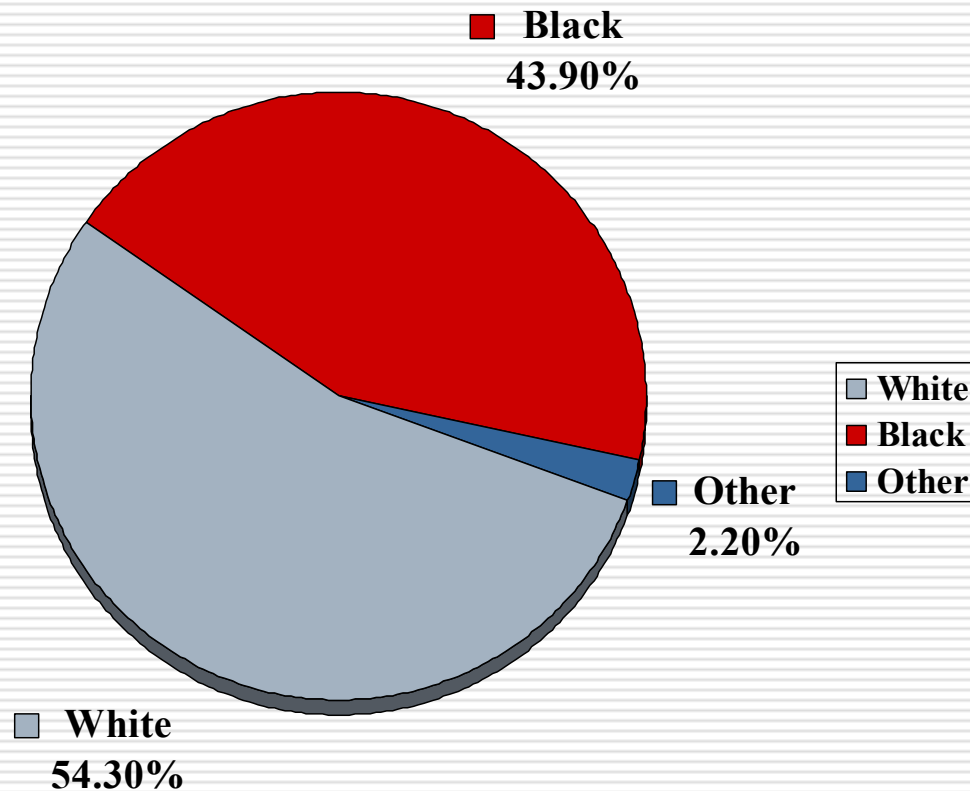
	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	828	1.3	50	41.2	8.6	0.2

Mathematics

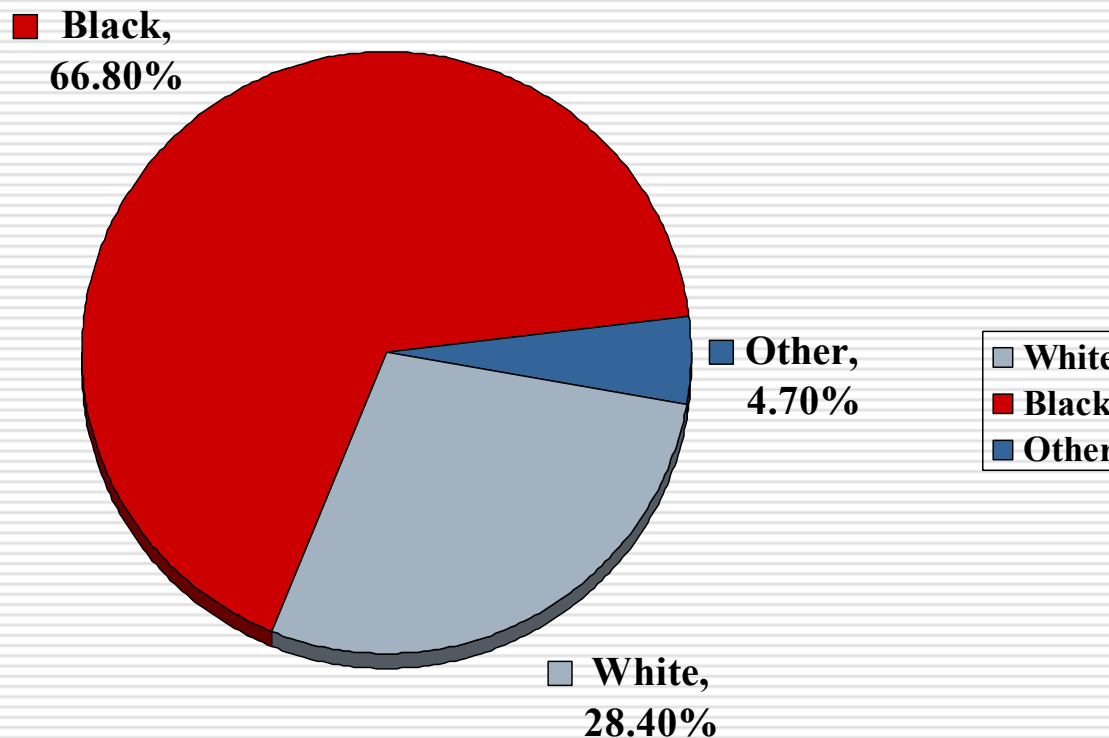
	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	830	1.1	59	32.8	7.1	1.1

All PACT Data Based on 2002 Scores

Dillon County Profile: Ethnicity, 1999



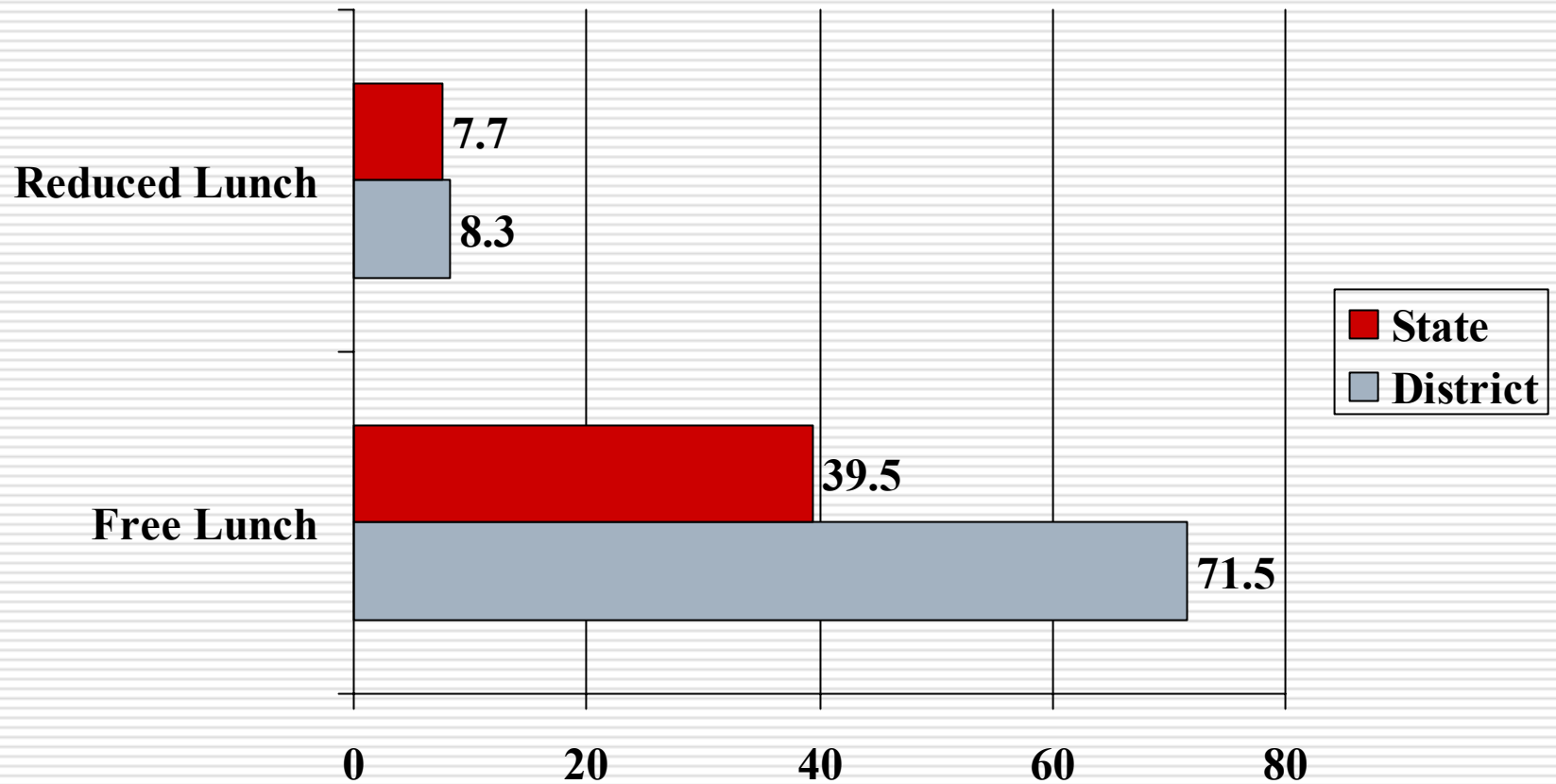
Dillon 2 Education Profile: Student Ethnicity, 1999



Dillon County Education Profile: Financial

1999 Average Selling Price of Homes	Dillon County	State of South Carolina
	\$62,407	\$128,055
1999 Per Capita Income	\$17,174	\$23,538
Below Poverty	28.1%	15.4%

Dillon 2 District Profile



Dillon 2 District Profile

☐ AP (Advanced Placement) Exams

- Administered = N/A
- Scoring 3 or Higher = N/A

☐ SAT

- Average Score = 412V / 425M
- Average Score (State) = 486V / 488M

☐ Graduation Rate

- Class of 1999/2000 = 57%*

(*Information from National Center for Educational Statistics)

Dillon 2002 PACT Test Scores

English/Language Arts

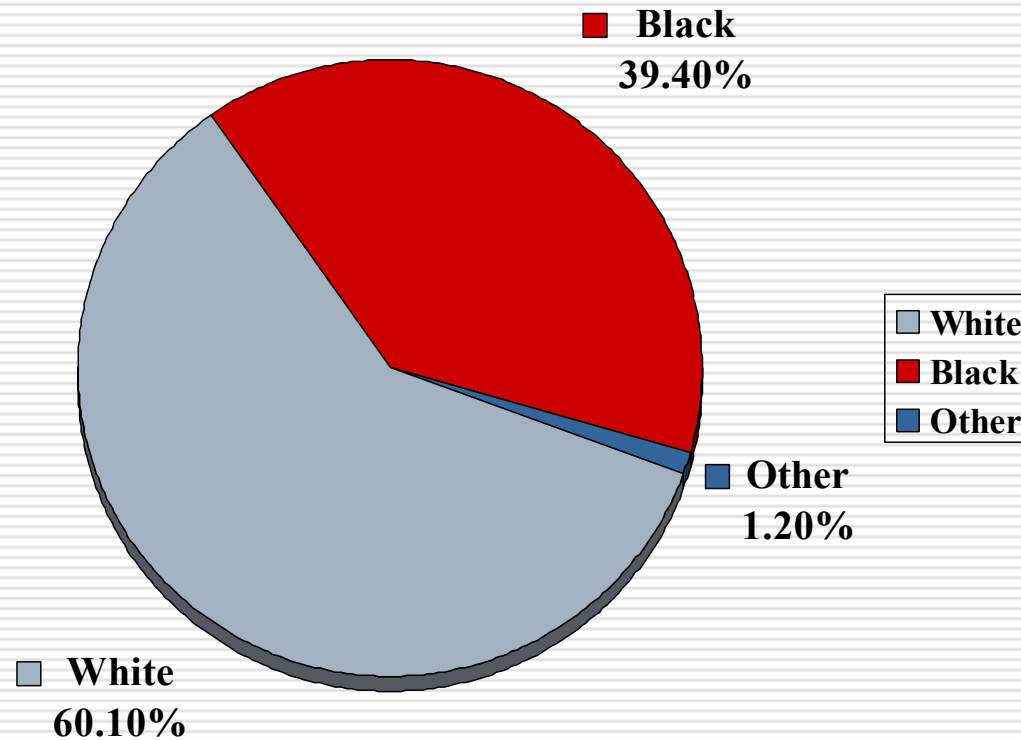
	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	1621	1.2	40.8	37.4	19.7	2

Mathematics

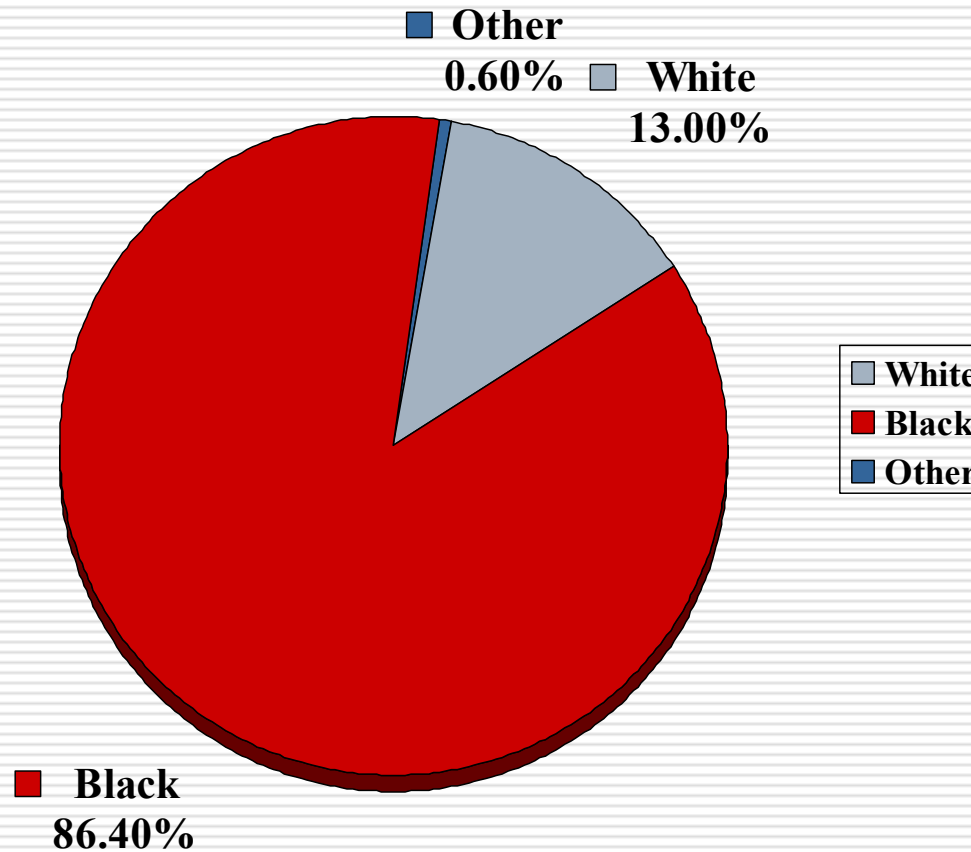
	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	1620	1.2	44.6	31.4	15.6	8.5

All PACT Data Based on 2002 Scores

Florence County Profile: Ethnicity, 1999



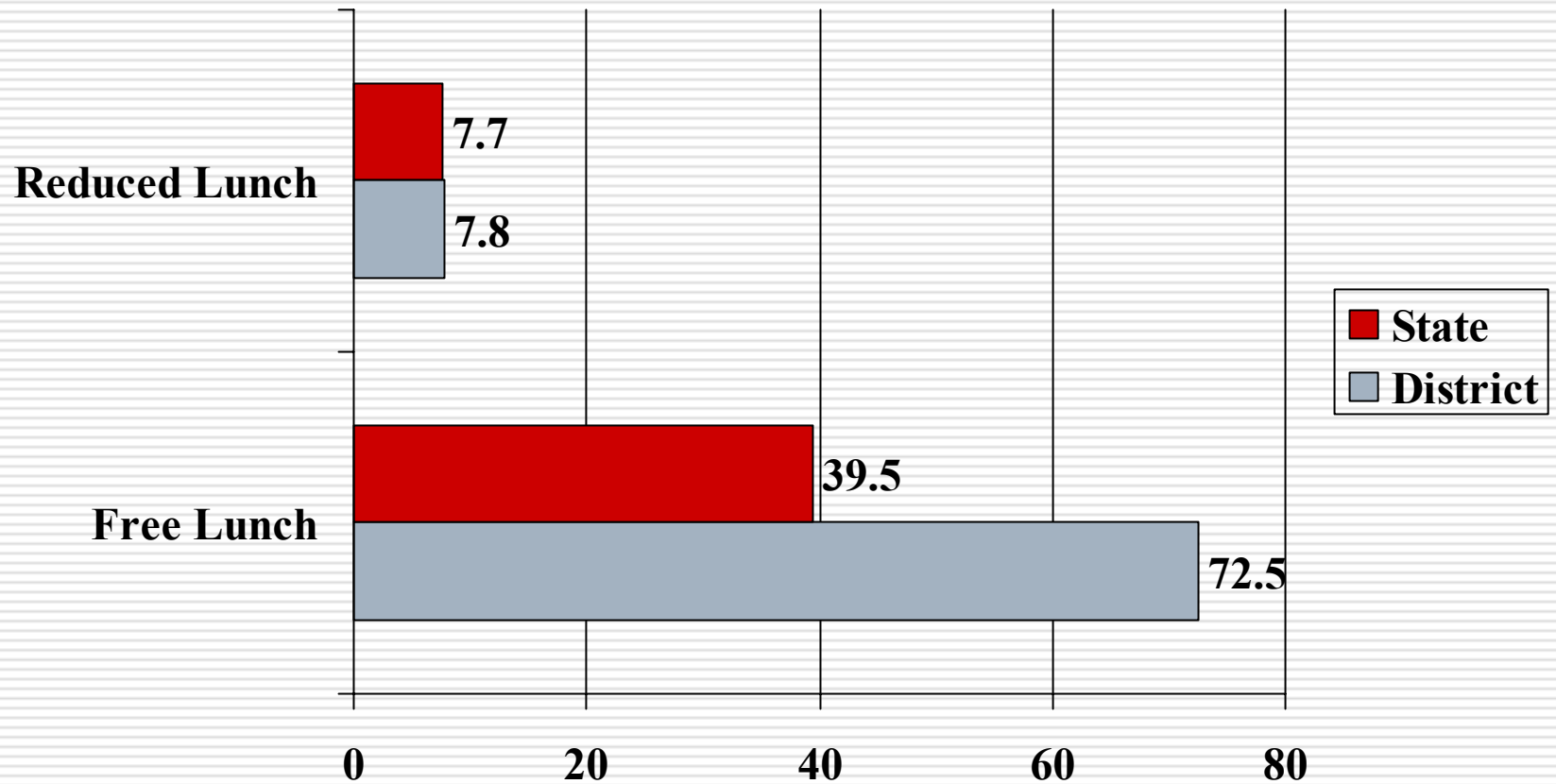
Florence 4 Education Profile: Student Ethnicity, 1999



Florence County Education Profile: Financial

1999 Average Selling Price of Homes	Florence County	State of South Carolina
	\$116,196	\$128,055
1999 Per Capita Income	\$23,360	\$23,538
Below Poverty	20.1%	15.4%

Florence 4 District Profile



Florence 4 District Profile

□ AP (Advanced Placement) Exams

- Administered = 24
- Scoring 3 or Higher = 4.2%

□ SAT

- Average Score = 401V / 406M
- Average Score (State) = 486V / 488M

□ Graduation Rate

- Class of 1999/2000 = 34%*

(*Information from National Center for Educational Statistics)

Florence 2002 PACT Test Scores

English/Language Arts

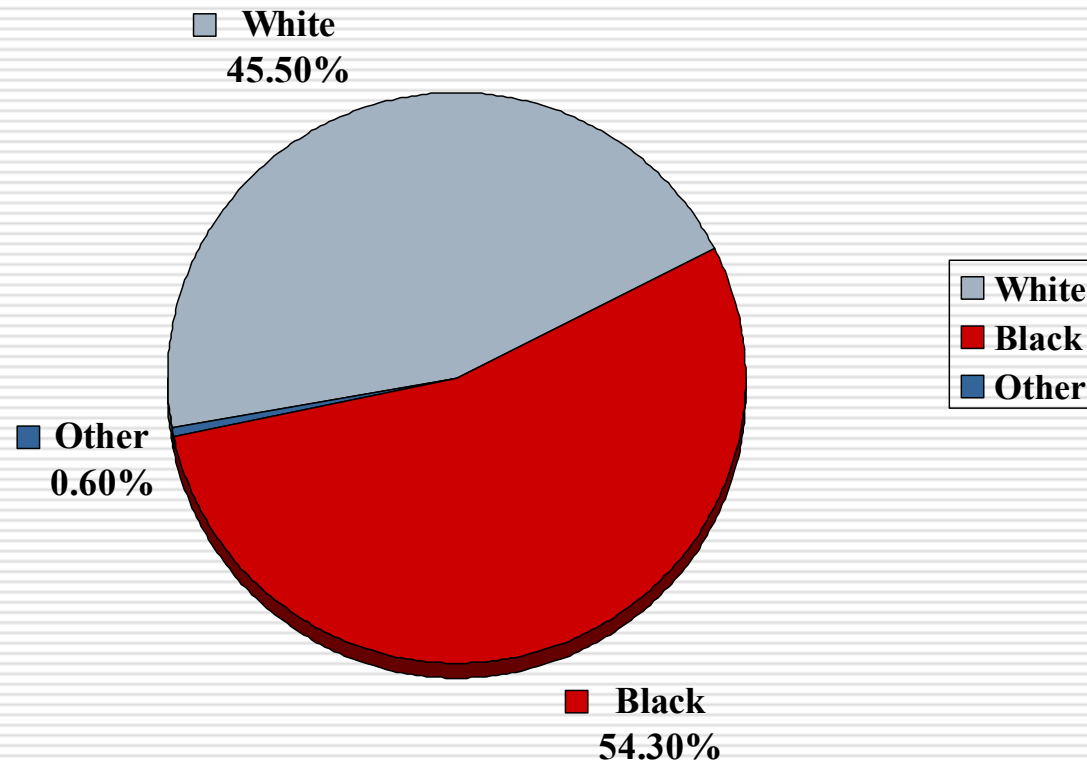
	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	456	0.7	49.8	38.4	11.4	0.4

Mathematics

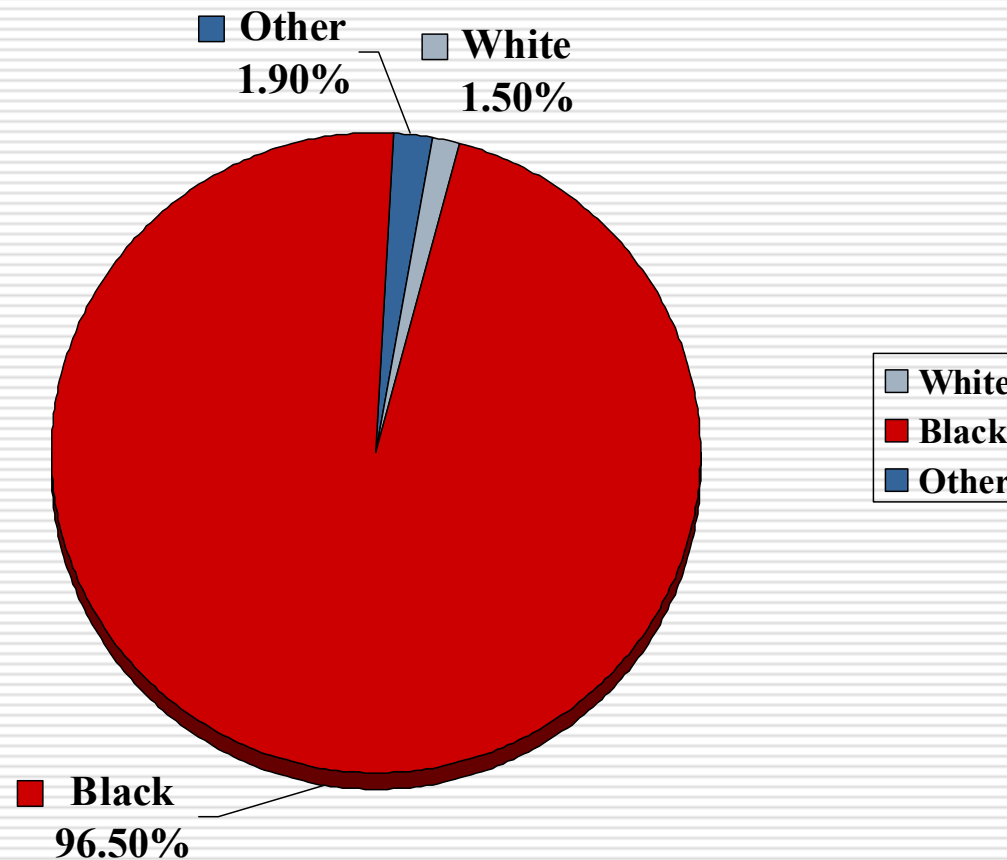
	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	458	0.2	52	37.8	8.7	1.5

All PACT Data Based on 2002 Scores

Hampton County Profile: Ethnicity, 1999



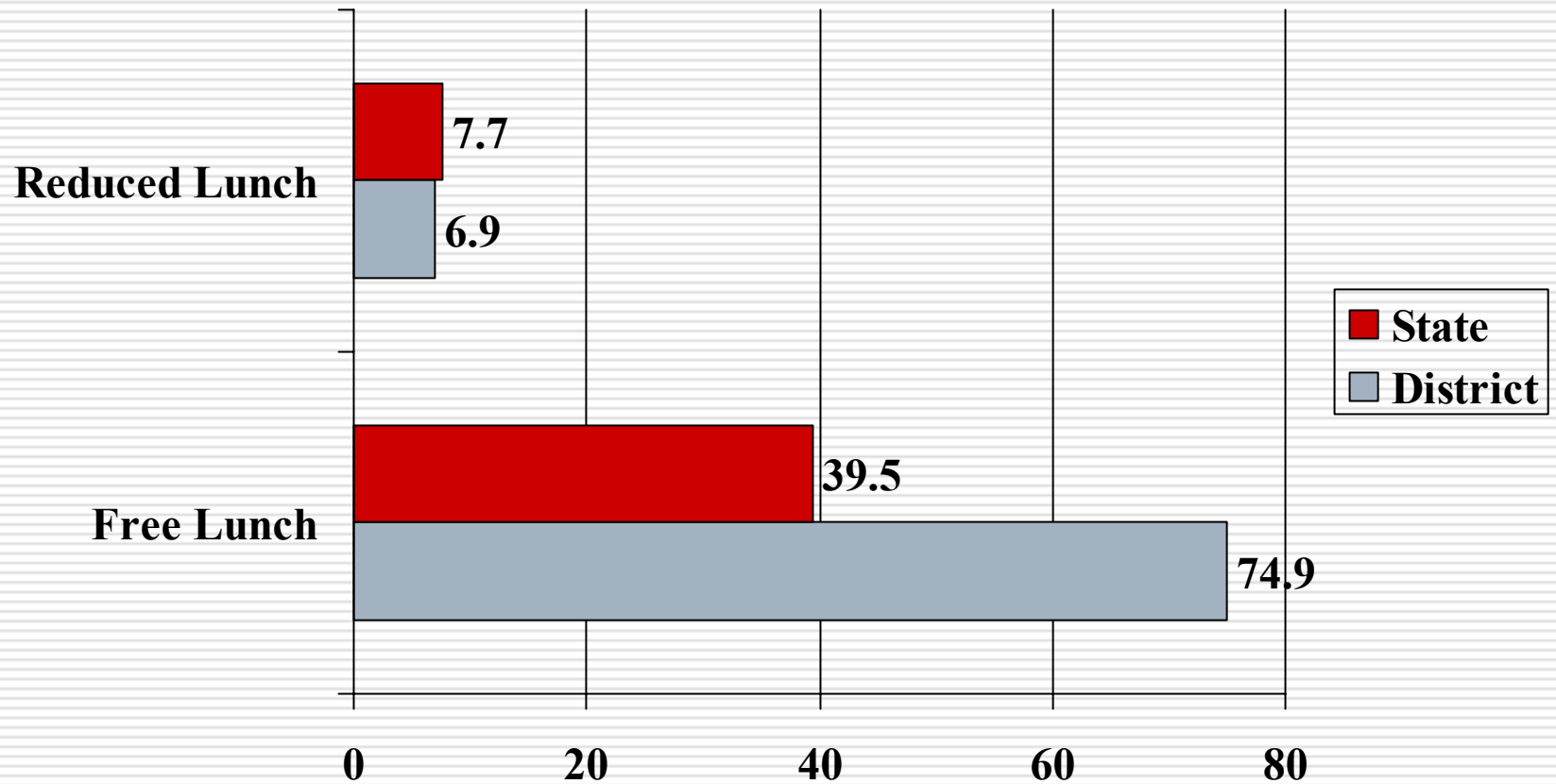
Hampton 2 Education Profile: Student Ethnicity, 1999



Hampton County Education Profile: Financial

1999 Average Selling Price of Homes	Hampton County	State of South Carolina
	\$48,648	\$128,055
1999 Per Capita Income	\$20,613	\$23,538
Below Poverty	27.7%	15.4%

Hampton 2 District Profile



Hampton 2 District Profile

☐ AP (Advanced Placement) Exams

- Administered = 20
- Scoring 3 or Higher = 0%

☐ SAT

- Average Score = 459V / 459M
- Average Score (State) = 486V / 488M

☐ Graduation Rate

- Class of 1999/2000 = 46%*

(*Information from National Center for Educational Statistics)

Hampton 2002 PACT Test Scores

English/Language Arts

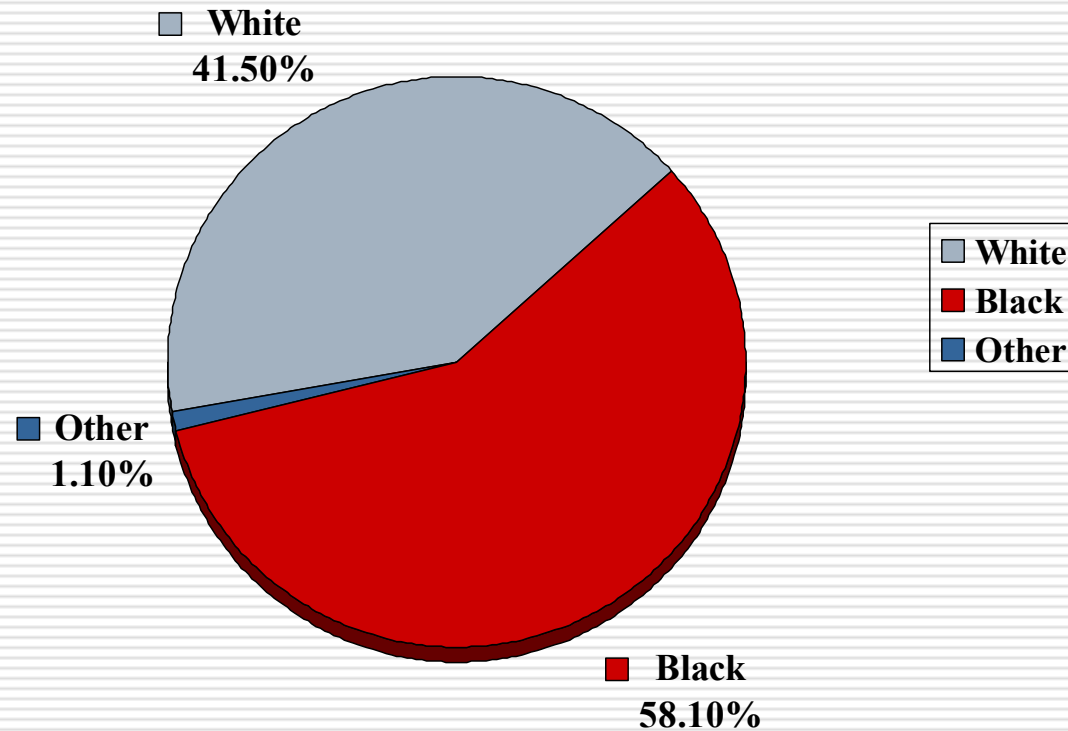
	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	609	13.7	50.1	41.5	8.4	

Mathematics

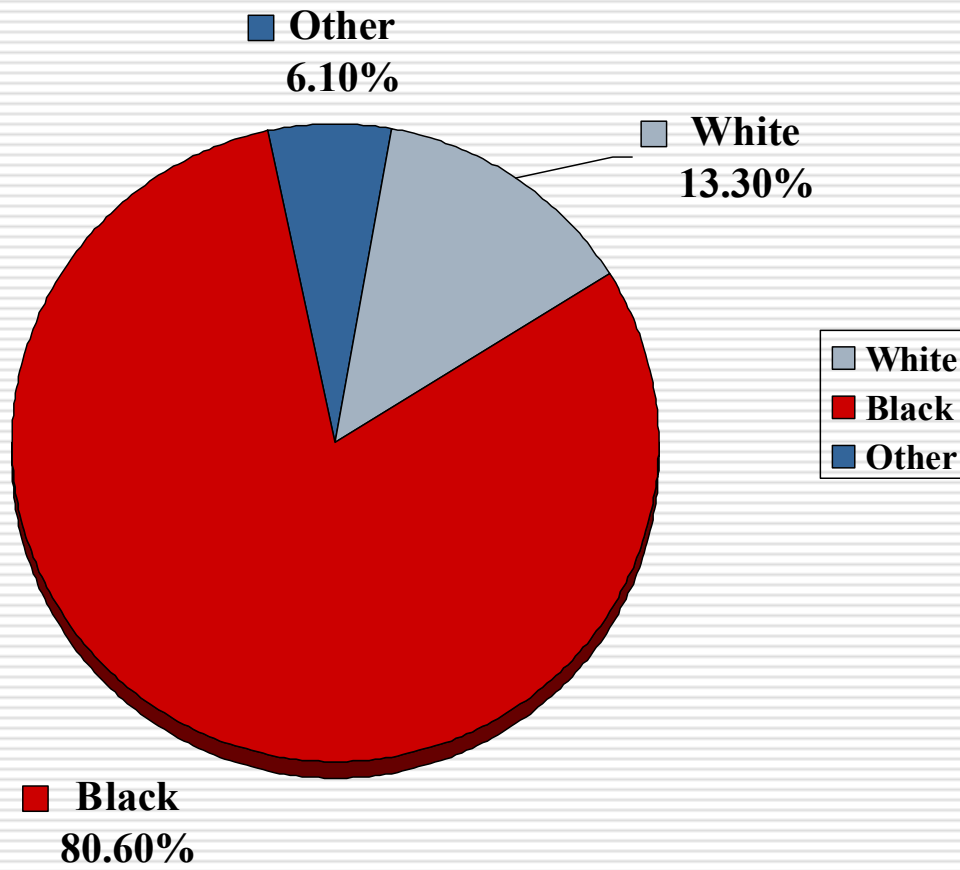
	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	610	13.6	65.6	28.9	5.2	0.3

All PACT Data Based on 2002 Scores

Jasper County Profile: Ethnicity, 1999



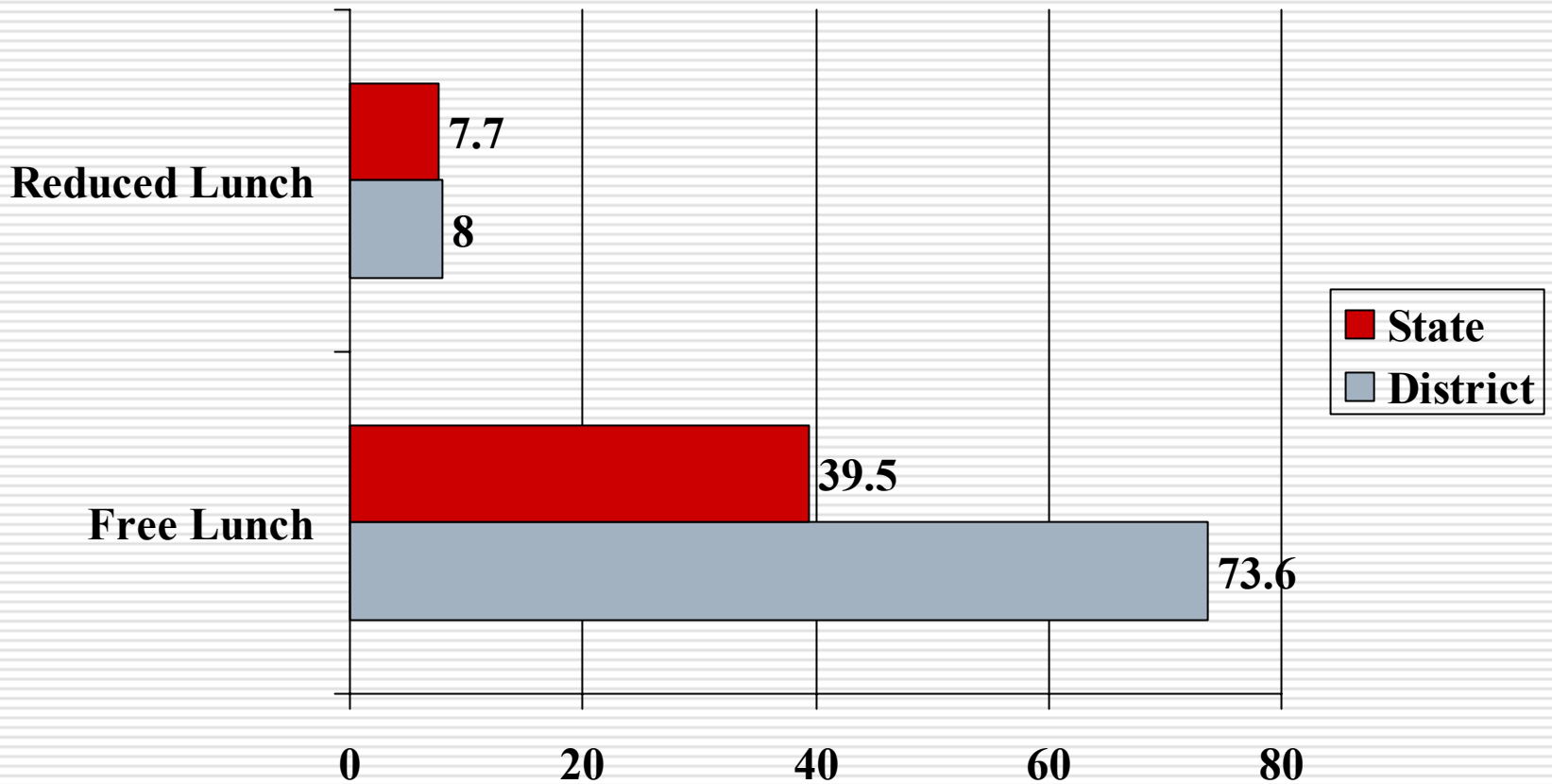
Jasper County Education Profile: Student Ethnicity, 1999



Jasper County Education Profile: Financial

1999 Average Selling Price of Homes	Jasper County	State of South Carolina
	\$104,692	\$128,055
1999 Per Capita Income	\$18,719	\$23,538
Below Poverty	25.3%	15.4%

Jasper District Profile



Jasper District Profile

☐ AP (Advanced Placement) Exams

- Administered = 42
- Scoring 3 or Higher = 2.4%

☐ SAT

- Average Score = 386V / 383M
- Average Score (State) = 486V / 488M

☐ Graduation Rate

- Class of 1999/2000 = 39%*

(*Information from National Center for Educational Statistics)

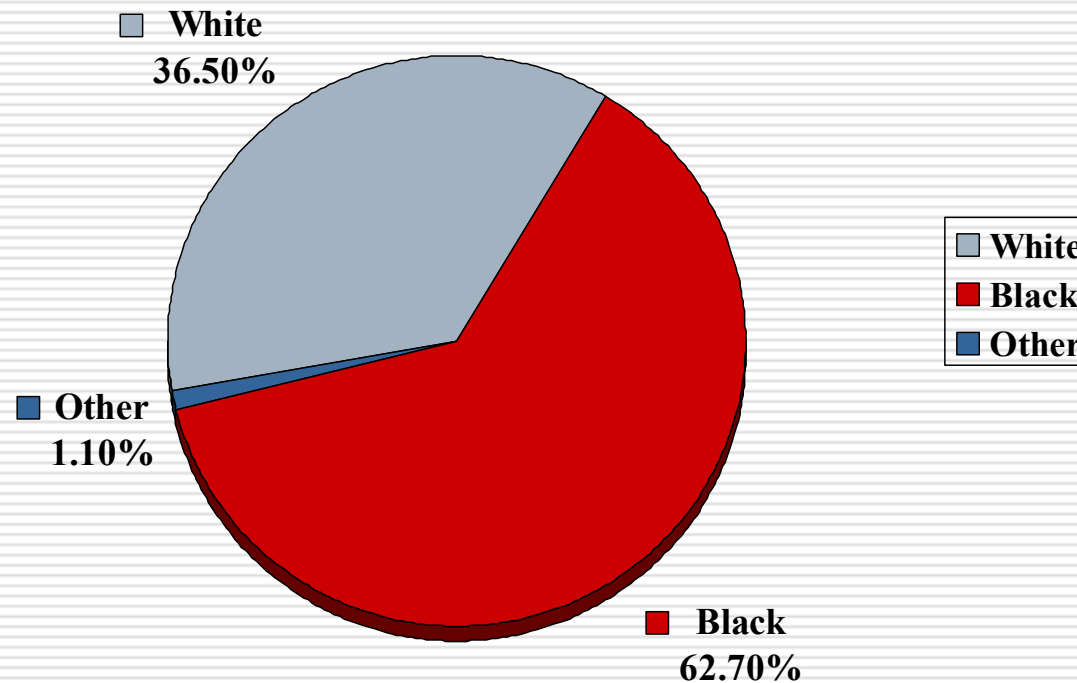
Jasper 2002 PACT Test Scores

English/Language Arts						
	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	1270	3.3	52.4	35.8	11.1	0.7

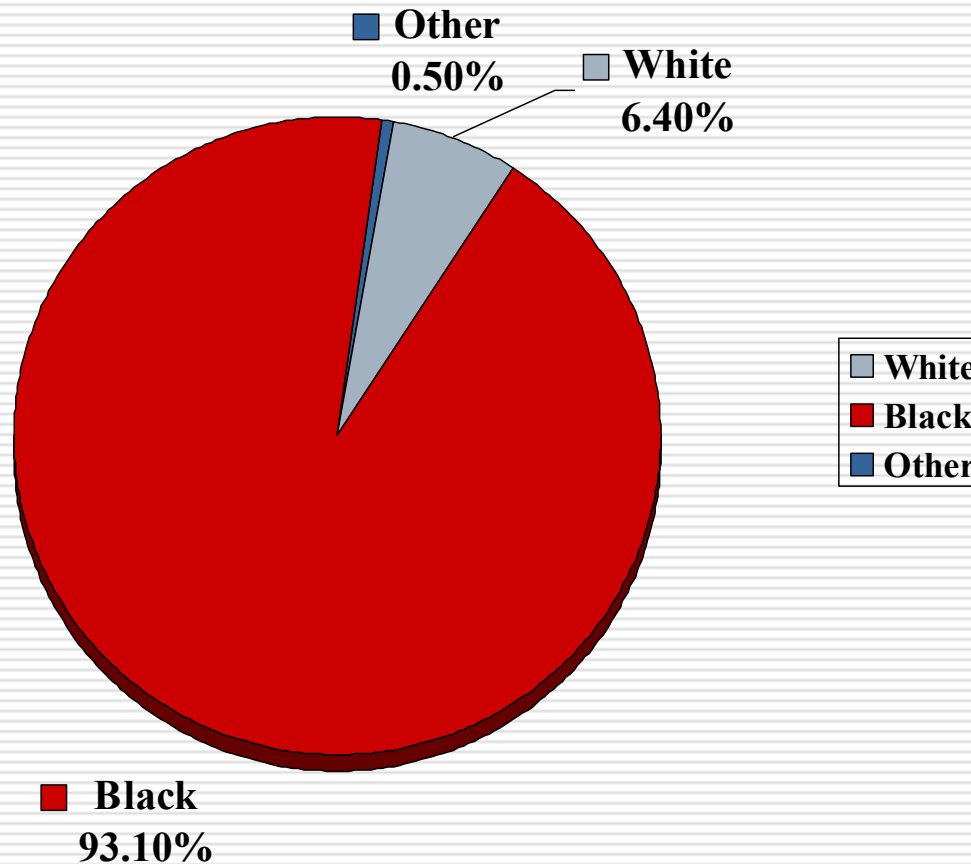
Mathematics						
	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	1269	3.4	63.4	28.6	6.6	1.4

All PACT Data Based on 2002 Scores

Lee County Profile: Ethnicity, 1999



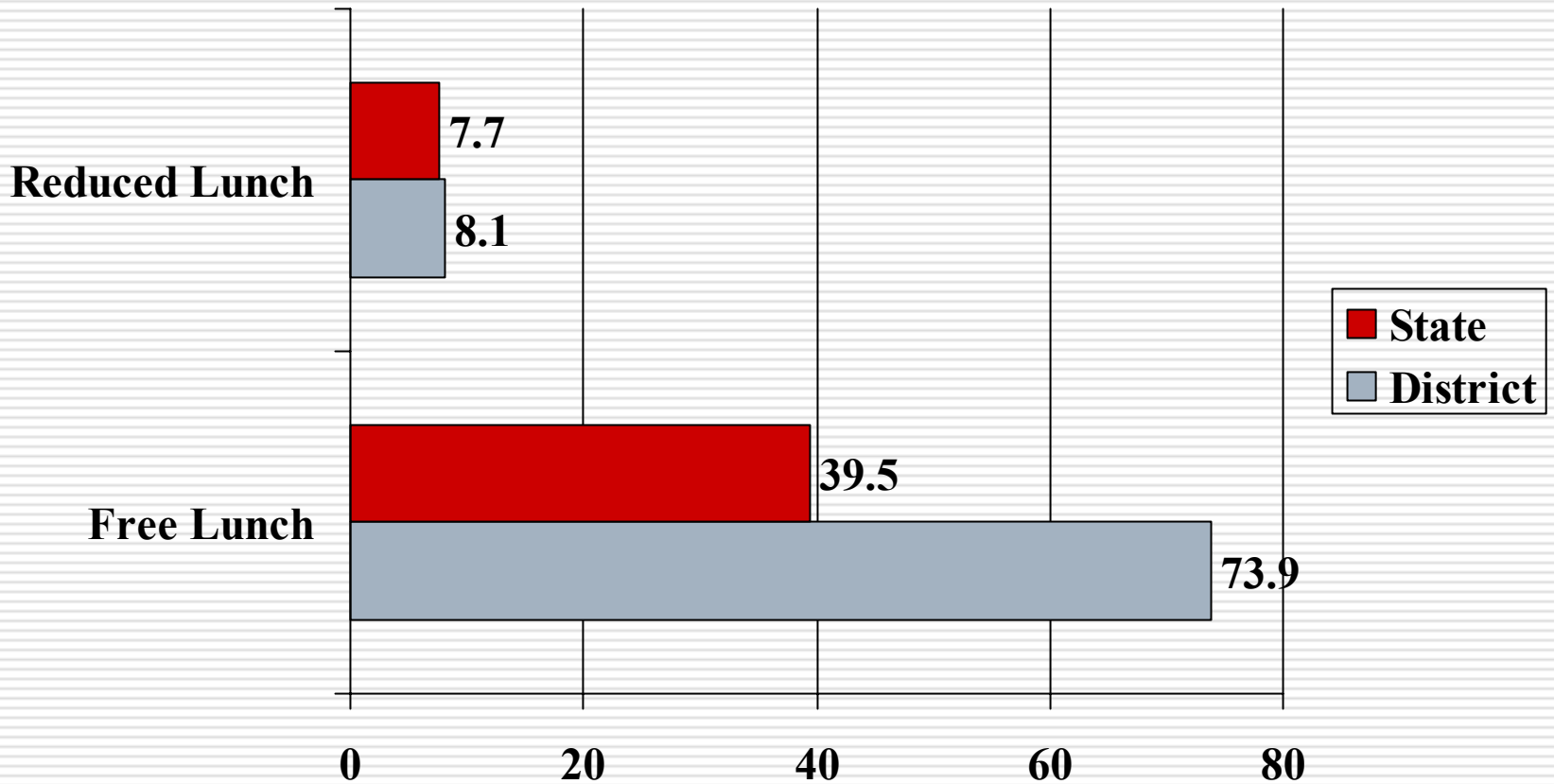
Lee County Education Profile: Student Ethnicity, 1999



Lee County Education Profile: Financial

1999 Average Selling Price of Homes	Lee County	State of South Carolina
	\$58,979	\$128,055
1999 Per Capita Income	\$13,725	\$23,538
Below Poverty	29.6%	15.4%

Lee District Profile



Lee District Profile

☐ AP (Advanced Placement) Exams

- Administered = 27
- Scoring 3 or Higher = 0%

☐ SAT

- Average Score = 391V / 392M
- Average Score (State) = 486V / 488M

☐ Graduation Rate

- Class of 1999/2000 = 33%*

(*Information from National Center for Educational Statistics)

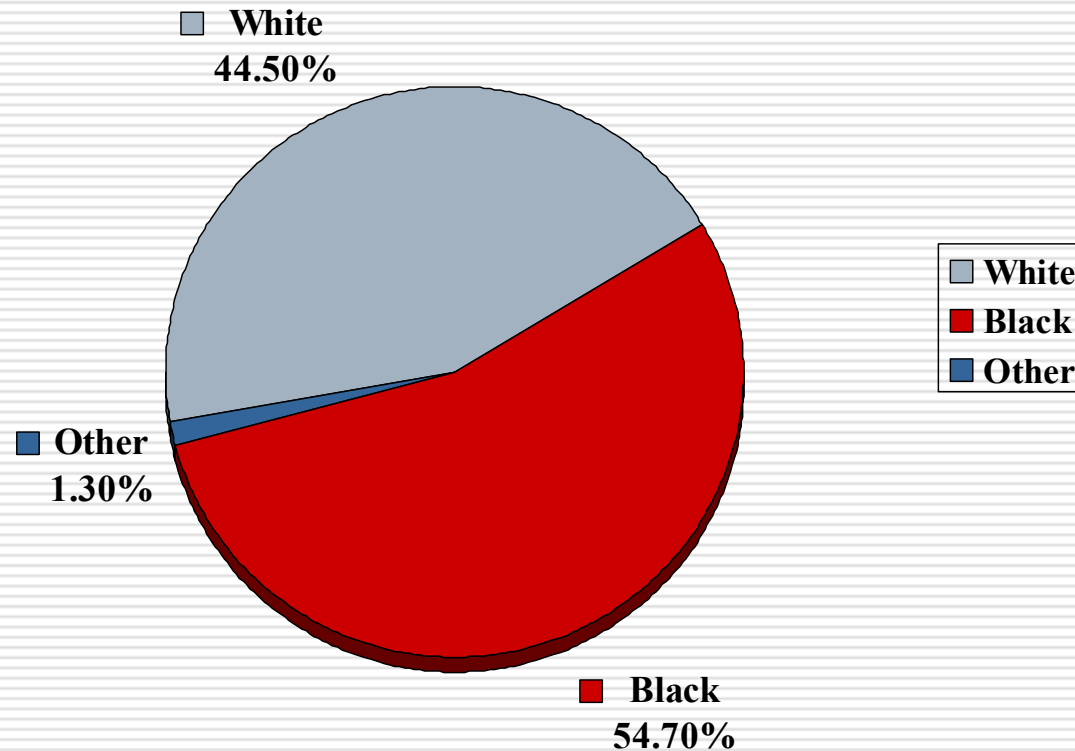
Lee 2002 PACT Test Scores

English/Language Arts						
	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	1247	2.3	50.4	39.8	9.5	0.3

Mathematics						
	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	1253	1.9	59.8	31.6	6.5	2.1

All PACT Data Based on 2002 Scores

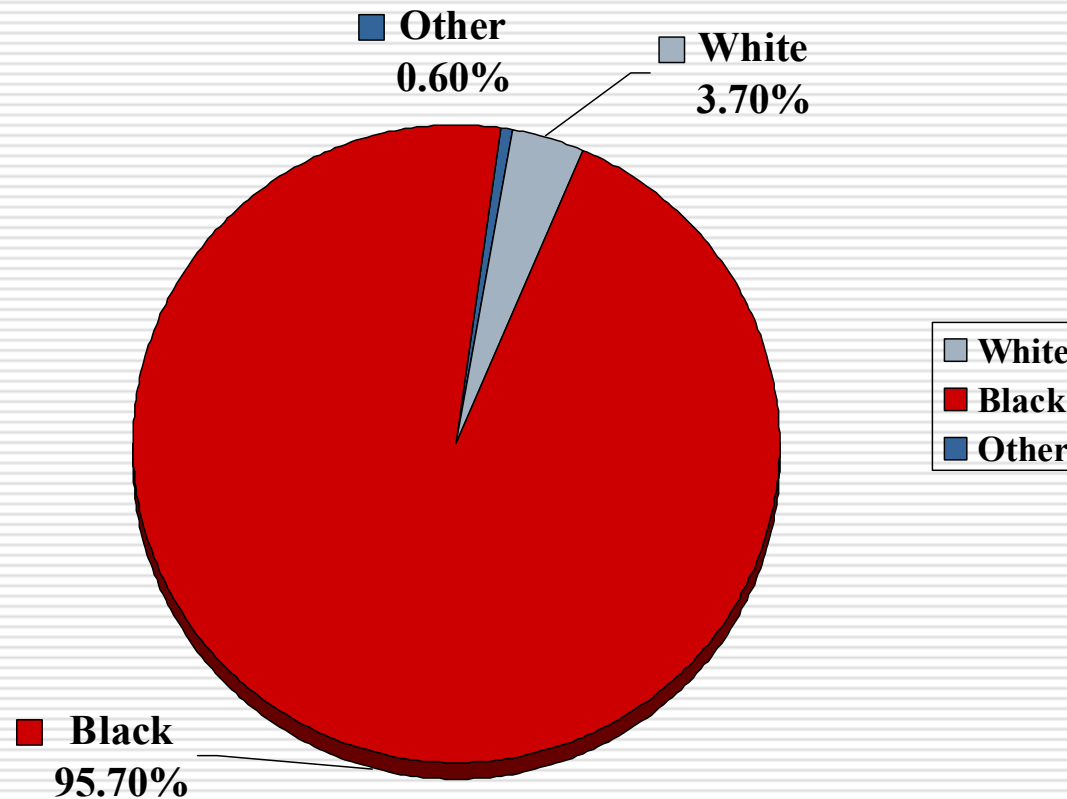
Marion County Profile: Ethnicity, 1999



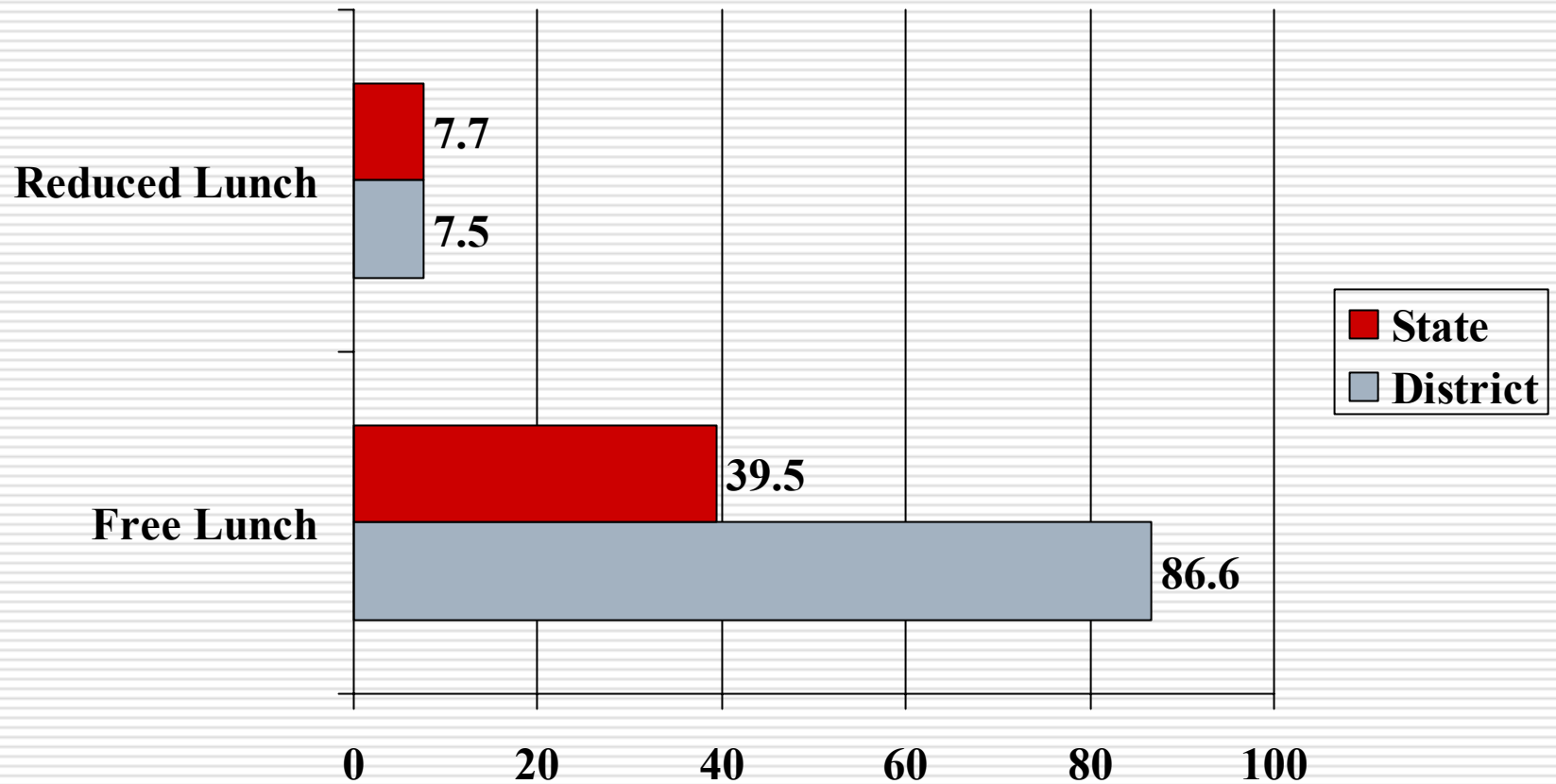
Marion County Education Profile: Financial

1999 Average Selling Price of Homes	Marion County	State of South Carolina
	\$51,580	\$128,055
1999 Per Capita Income	\$17,867	\$23,538
Below Poverty	28.6%	15.4%

Marion 3 Education Profile: Student Ethnicity, 1999



Marion 3 District Profile



Marion 3 District Profile

☐ AP (Advanced Placement) Exams

- Administered = N/A
- Scoring 3 or Higher = N/A

☐ SAT

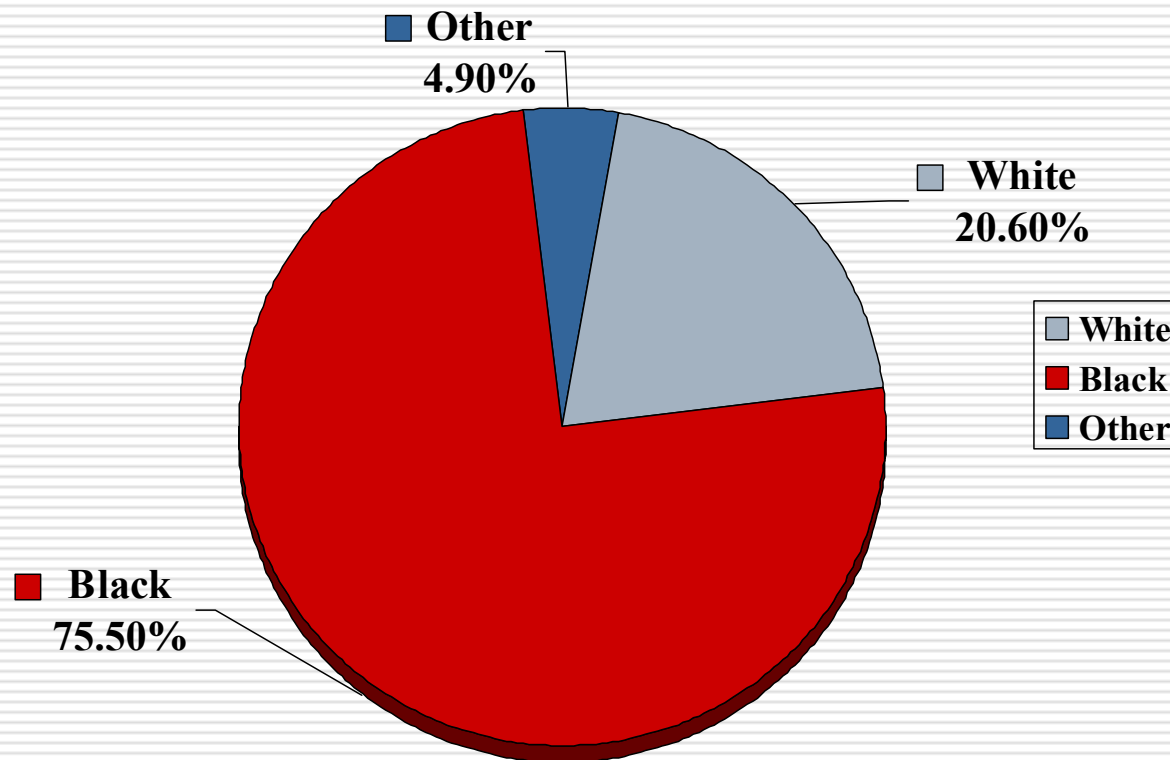
- Average Score = 435V / 470M
- Average Score (State) = 486V / 488M

☐ Graduation Rate

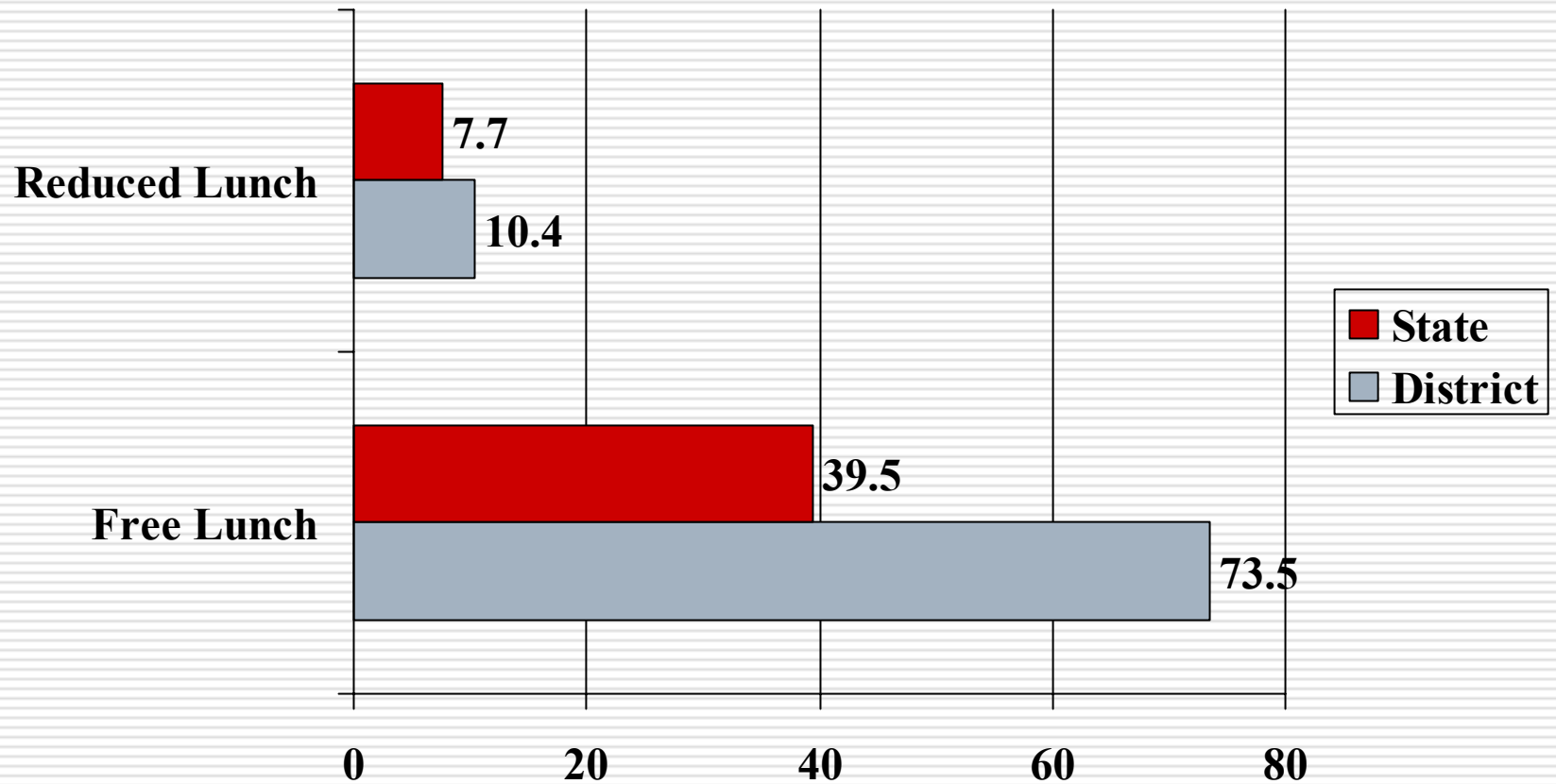
- Class of 1999/2000 = 56%*

(*Information from National Center for Educational Statistics)

Marion 4 Profile: Student Ethnicity, 1999



Marion 4 District Profile



Marion 4 District Profile

☐ AP (Advanced Placement) Exams

- Administered = N/A
- Scoring 3 or Higher = N/A

☐ SAT

- Average Score = 388V / 381M
- Average Score (State) = 486V / 488M

☐ Graduation Rate

- Class of 1999/2000 = 56%*

(*Information from National Center for Educational Statistics)

Marion 7 - 2002 PACT Test Scores

English/Language Arts

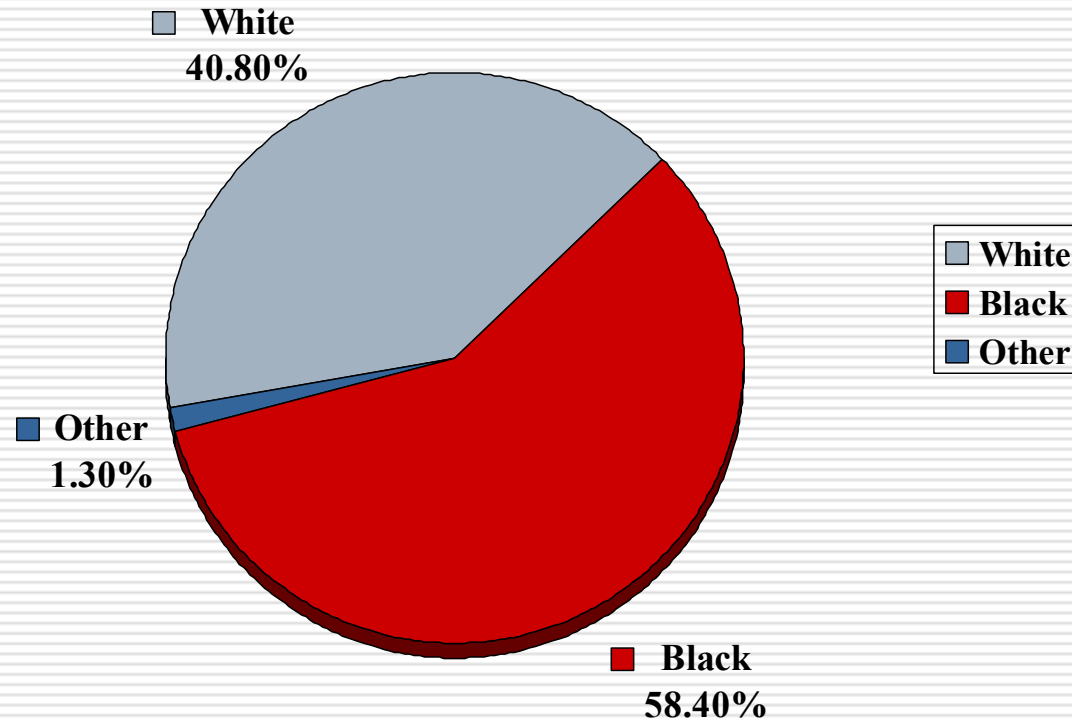
	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	446	1.8	44.2	44.4	10.8	0.7

Mathematics

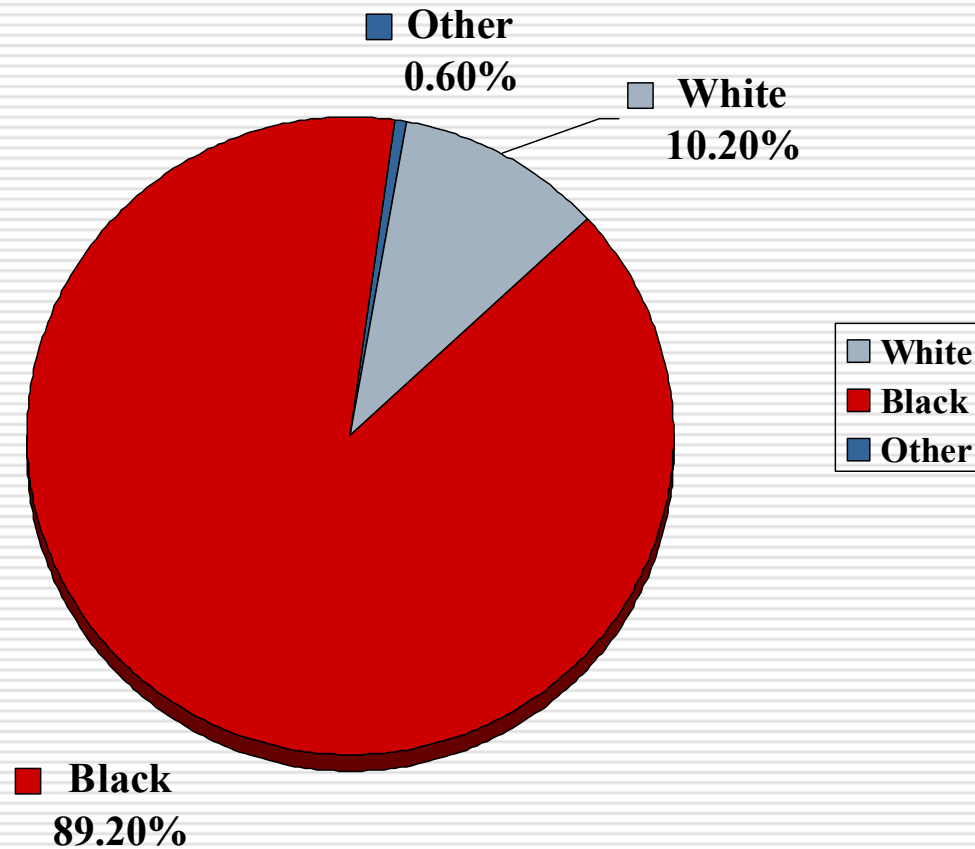
	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	449	1.1	50.6	40.1	7.8	1.6

All PACT Data Based on 2002 Scores

Orangeburg County Profile: Ethnicity, 1999



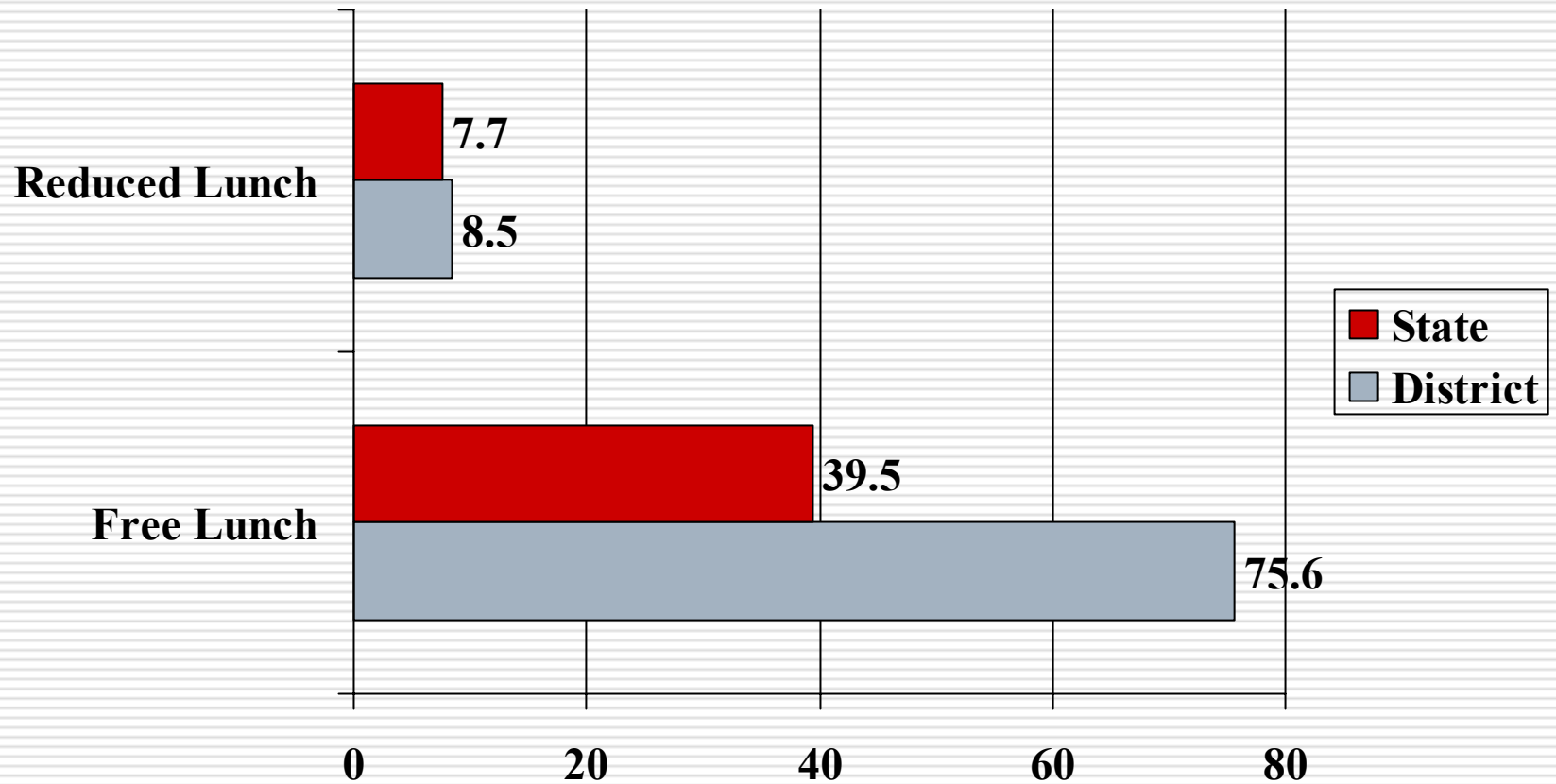
Orangeburg 3 Education Profile: Student Ethnicity, 1999



Orangeburg 3 County Profile: Financial

1999 Average Selling Price of Homes	Orangeburg County	State of South Carolina
	\$63,028	\$128,055
1999 Per Capita Income	\$19,884	\$23,538
Below Poverty	24.9%	15.4%

Orangeburg 3 District Profile



Orangeburg 3 District Profile

☐ AP (Advanced Placement) Exams

- Administered = 11
- Scoring 3 or Higher = 0%

☐ SAT

- Average Score = 394V / 400M
- Average Score (State) = 486V / 488M

☐ Graduation Rate

- Class of 1999/2000 = 52%*

(*Information from National Center for Educational Statistics)

Orangeburg 3 - 2002 PACT Test Scores

English/Language Arts

	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	1661	1.1	39.4	45.2	14.8	0.7

Mathematics

	Number Tested	% Not Tested	% Below Basic	% Basic	% Proficient	% Advanced
All Students	1662	1.1	51.8	35.1	10.2	2.9

All PACT Data Based on 2002 Scores

What Do These Demographics Show?

- 1) The Plaintiff counties and school districts have low fiscal capacity.
 - Low per capita incomes
 - Low tax bases
- 2) The counties and districts have higher minority populations than the State averages.
- 3) The schools' minority populations are significantly higher than the general population.
- 4) The Districts have very high percentages of impoverished, disadvantaged students.
- 5) The student achievement levels in the Plaintiff districts are unsatisfactory across all performance measures.

Key Idea: Schools in the Plaintiff districts have low financial resources and high student needs.

Inputs

- How does South Carolina govern education
 - EFA
 - EIA
 - EAA

Education Finance Act of 1977 (59-20-10, et seq.)

Declaration of Legislative Purpose:

"To guarantee to each student in the public schools of S.C. the availability of at least minimum education programs and services appropriate to his needs, and which are substantially equal to those available to other students with similar needs and reasonably comparable from a program standpoint to those students with similar needs and reasonably comparable from a program standpoint to those students of all classifications, notwithstanding geographical differences and varying local economic factors." (emphasis added)

Key Idea: A guarantee of an educational program to each student based on his needs notwithstanding geographical considerations or local economic factors.

Education Improvement Act of 1984 (59-39-100, et seq.)

Major education goals were established; five of which were:

- Raising student performance
- Teaching and testing basic skills
- Evaluating the teaching profession
- Improving leadership
- Providing adequate school buildings

Education Improvement Act of 1984 (59-39-100, et seq.)

The EIA focused on improving teachers' salaries, a six-hour school day, and five-year-old kindergarten. It also provided for remedial help for students with demonstrated needs, and demonstrated the State's recognition that students required sufficient education to prepare for work.

Key Idea: First remedial and compensatory help provided by law, based on small incremental weightings, and recognized importance of State equipping students for the job market or secondary education.

Education Accountability Act of 1998 (15-18-10)

Established accountability system for public education.

The purpose is stated as follows:

“The General Assembly finds that South Carolinians have a commitment to public education and a conviction that high expectations for all students are vital components for improving academic achievement. It is the purpose of the General Assembly . . . to establish a performance-based accountability system for public education which focuses on improving teaching and learning as the students are equipped with a strong academic foundation.”

Article 3, Section 59-18-300

Established new state standards. The State Board was directed to adopt grade-specific performance-oriented educational standards. The educational outcomes were intended to provide students the following competencies:

- (1) Read, view, and listen to complex information in the English language;
- (2) Write and speak effectively in the English language;
- (3) Solve problems by applying mathematics;
- (4) Conduct research and communicate findings;
- (5) Understand and apply scientific concepts;
- (6) Obtain a working knowledge of world, United States, and South Carolina history, government, economics, and geography; and
- (7) Use information to make decisions.

Education Accountability Act

Impact on Students

- (1) Academic plans for students performing off grade level
- (2) If a student is not at grade level based on standardized test scores, he or she may be retained, required to attend summer school, or attend a comprehensive remediation program. This student is placed on academic probation.
- (3) Comprehensive remedial program must operate outside of the normal school day (summer school)
- (4) At the end of summer school, if the student is not on grade level, the student will be placed on probation.
- (5) After a conference with the student, his or her parents, and school personnel, a stipulation provides that the student will be retained or continue to perform off grade level.

Key Idea: General Assembly adopted new state education standards, created "high stakes" testing.

State Funding for K-12 Education

School Funding Provided by State

- Funds are derived from the following sources:
 1. General fund, including EFA
 2. EIA one-cent sales tax increase
 3. Lottery (approximately one-third of total lottery revenue, believed to be \$80,000,000 for most recent school year)
- Of those revenue sources, only the EFA is “wealth sensitive”.
- None have funding formula or “weighting” for poverty.

Key Idea: South Carolina does not have a poverty rating as do many, if not most, other state formulas.

State's Commitment to Public Education K-12

- When the Education Finance Act was enacted, the State paid all fringe benefits for school employees. It has gradually shifted the cost of providing fringe benefits to the districts as follows:

EMPLOYER CONTRIBUTIONS

Fiscal Year	General Funds Appropriated for Fringe Benefits	District's General Fund Actual Expenditures	Percentage of Actual Expenditures Funded by State
1972-73	\$ 37,129,225	\$ 37,129,225	100.00%
1973-74	44,320,205	44,320,205	100.00%
1974-75	55,301,741	55,301,741	100.00%
1975-76	61,525,449	61,525,449	100.00%
1976-77	68,774,699	68,774,699	100.00%
1977-78	86,083,391	86,083,391	100.00%
1978-79	91,491,136	91,491,136	100.00%
1979-80	101,583,124	101,583,124	100.00%
1980-81	106,996,786	106,996,786	100.00%
1981-82	123,481,731	123,481,731	100.00%
1982-83	135,073,909	143,605,493	94.06%
1983-84	140,017,592	148,728,517	94.14%
1984-85	145,848,591	166,300,723	87.70%
1985-86	154,837,622	189,128,613	81.87%
1986-87	158,976,212	206,004,915	77.17%
1987-88	161,811,094	225,544,875	71.74%
1988-89 (1)	173,724,802	246,621,126	70.44%
1989-90	200,260,804	281,693,687	71.09%
1990-91 (2)	224,860,595	305,725,353	73.55%
1991-92	240,455,064	345,116,592	69.67%
1992-93 (3)	257,992,184	375,371,805	68.73%
1993-94	272,249,903	399,154,733	68.21%
1994-95	280,222,970	409,185,787	68.48%
1995-96	284,874,159	427,332,788	66.66%
1996-97 (4)	294,659,831	448,509,096	65.70%
1997-98	307,604,152	466,616,931	65.92%
1998-99 (5)	316,044,795	479,436,885	65.92%
1999-00	338,345,953	513,267,510	65.92%

NOTES:

(1) Beginning with fiscal year 1988-89, state funds appropriated for fringe benefits included benefits for school bus drivers' salaries which were appropriated under a separate line item

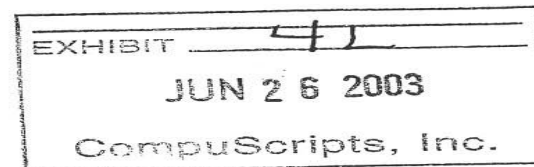
(2) Beginning with fiscal year 1990-91, additional money was allocated to school districts for retirement insurance for retirees.

(3) A "hold harmless" amount has been included because of the equity distribution method.

(4) Total reflects amount appropriated for extended day kindergarten.

(5) Beginning with fiscal year 1998-99, state funds appropriated for reduce class size included fringe benefits.

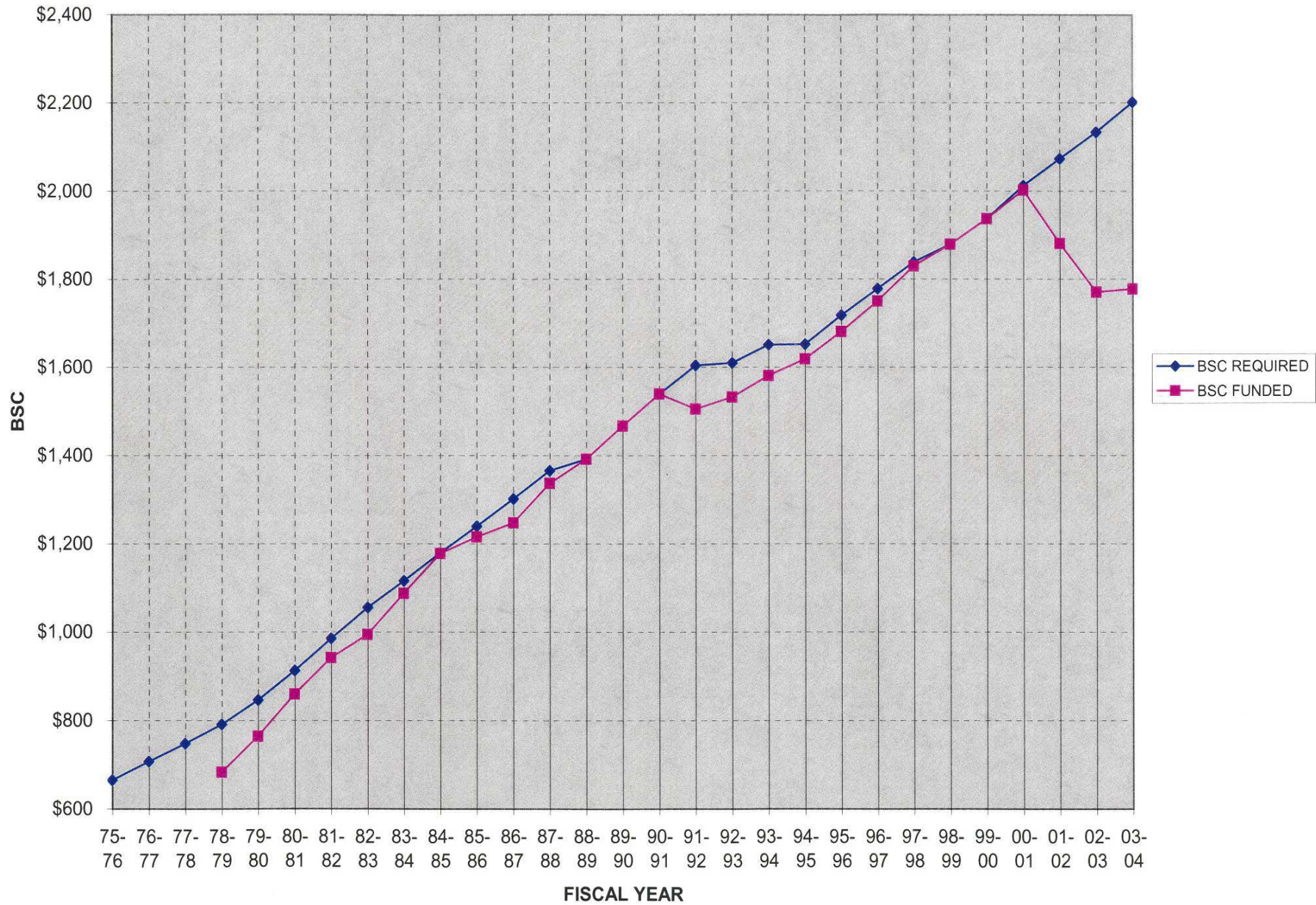
ITALICS INDICATE PROJECTIONS



State's Commitment to Public Education K-12

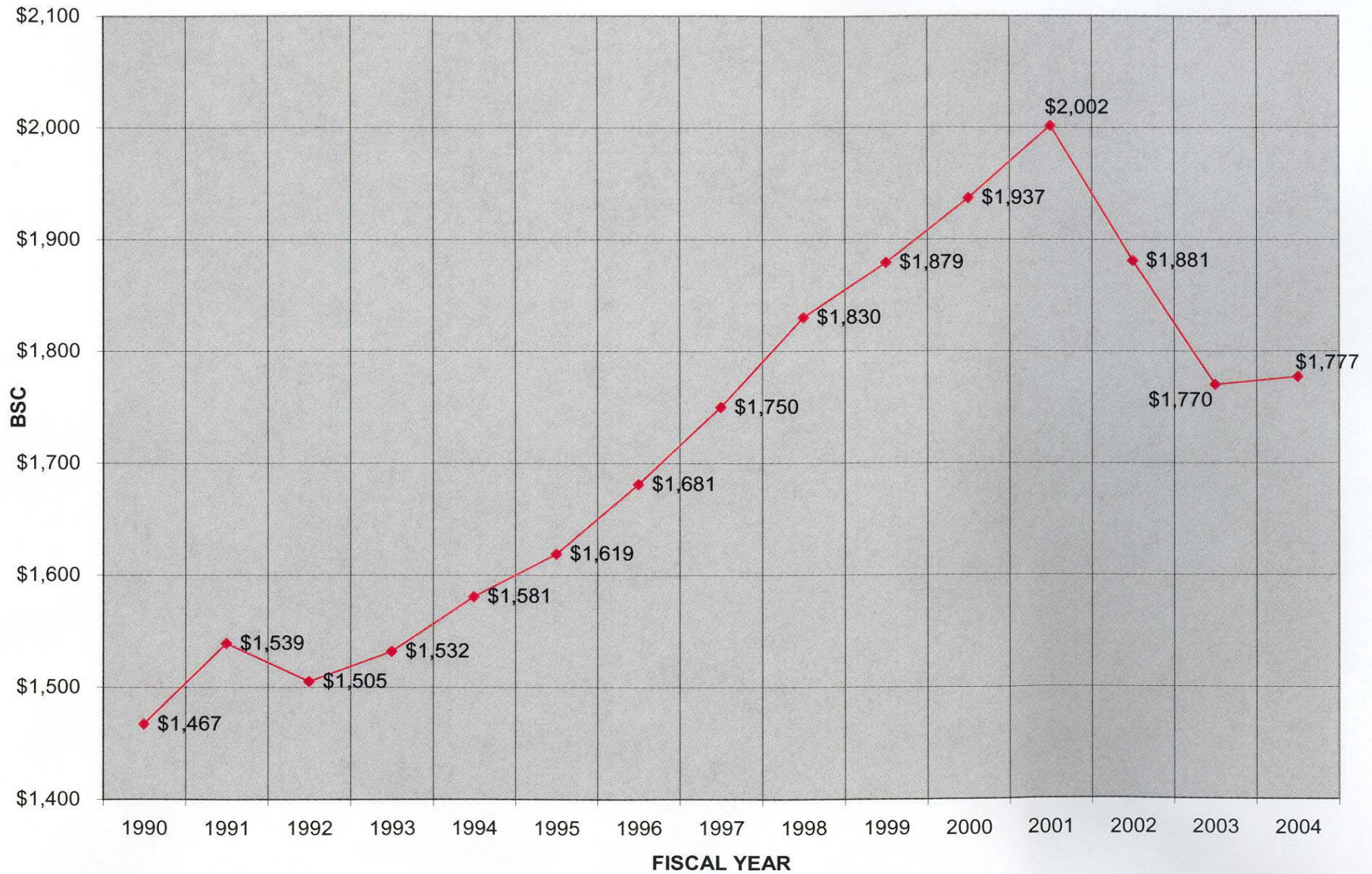
- ❑ When the Education Finance Act was passed, the State paid all school transportation costs. Districts now pay approximately 60 percent of the costs.
- ❑ The Base Student Cost of the Education Finance Act has been fully funded for only eight of the 26 years since its passage.

HISTORY OF BSC



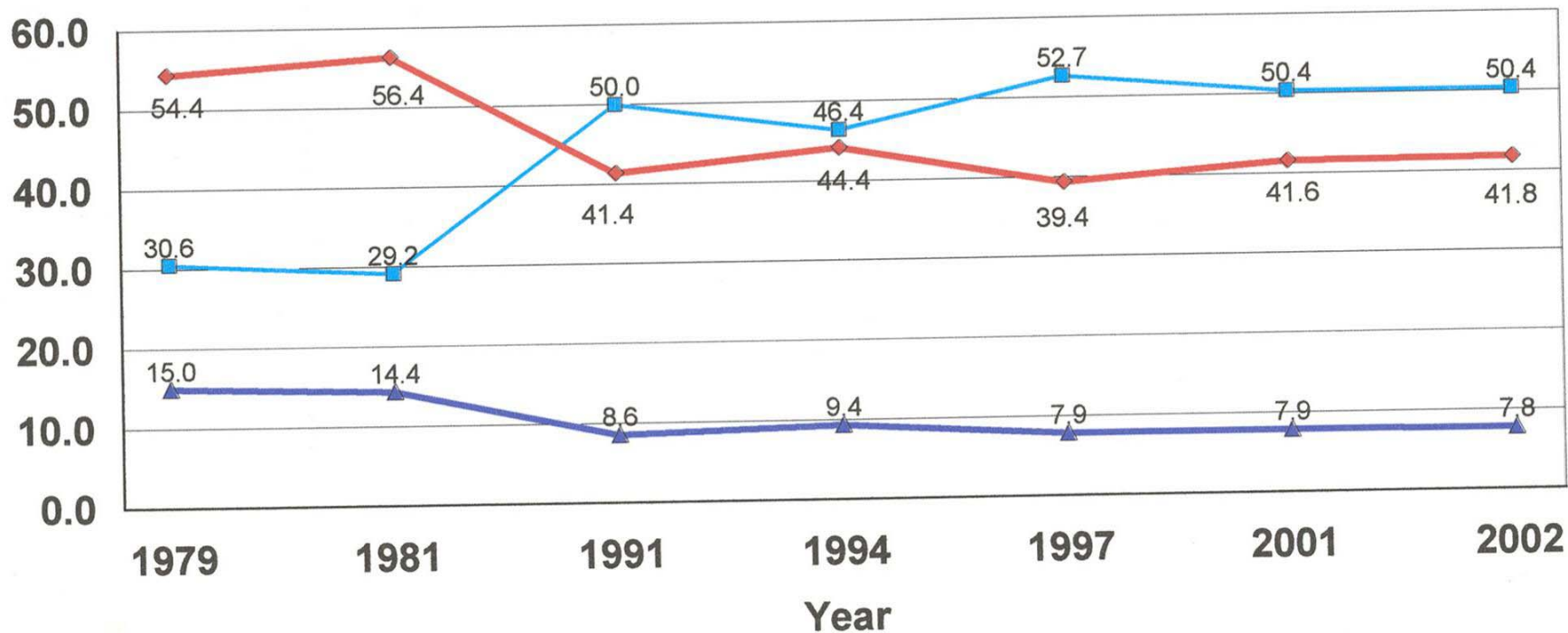
BSC ACTUAL FUNDED (BSC & WPU)

—◆— BSC ACTUAL FUNDED (BSC & WPU)



PERCENT OF REVENUES PROVIDED BY THE LOCAL, STATE, AND FEDERAL GOVERNMENTS, SELECTED YEARS, 1979-2002, STATE OF SOUTH CAROLINA

Percent

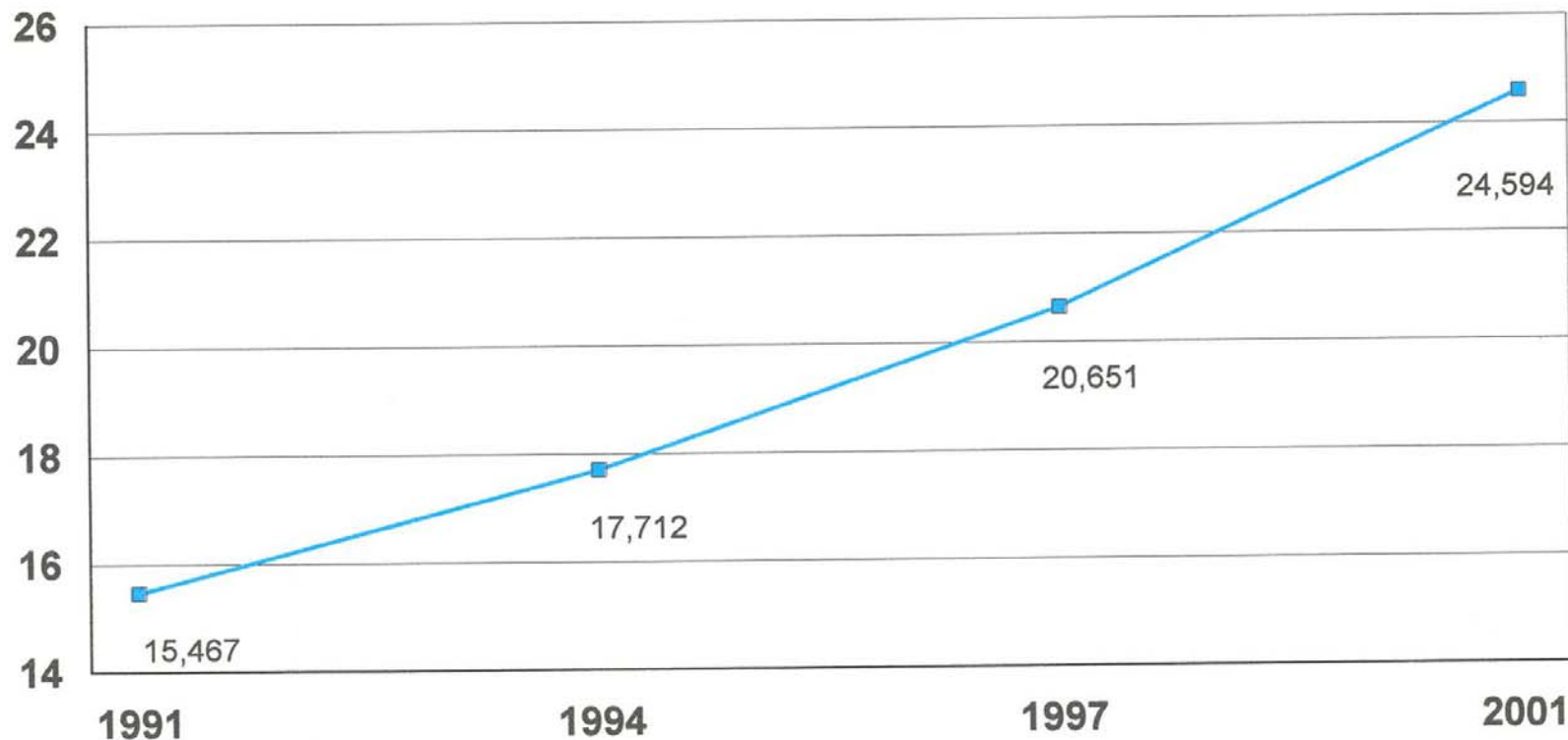


Source: National Education Association,
Rankings of the States.
(Washington, D.C. NEA, Various Years).

—■— % Local
—◆— % State
—▲— % Federal

PER CAPITA PERSONAL INCOME, SELECTED YEARS, 1991-2001, STATE OF SOUTH CAROLINA

Thousands

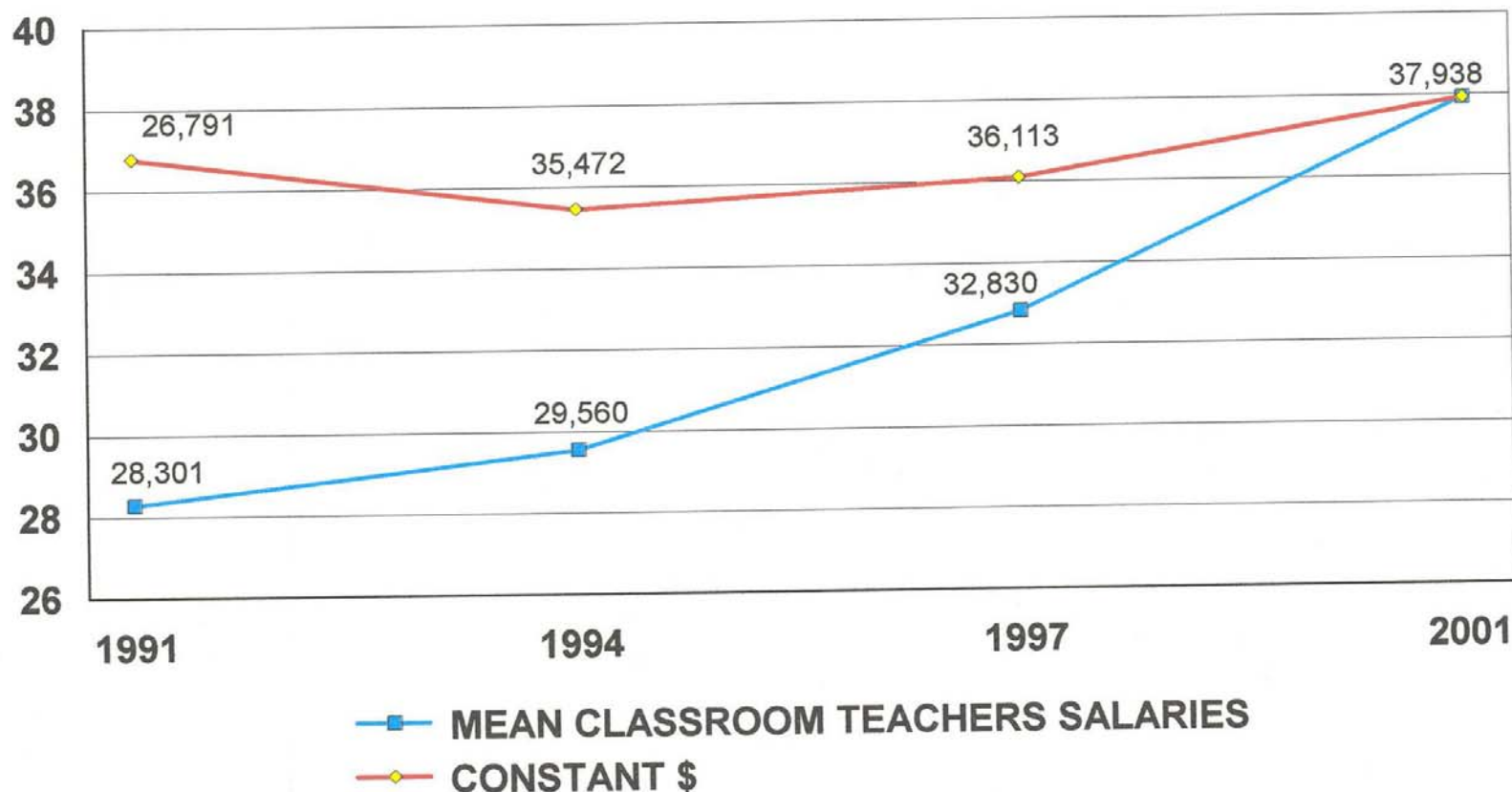


—■— PER CAPITA PERSONAL INCOME

Source: National Education Association,
Rankings of the States.
(Washington, D.C. NEA, Various Years).

MEAN ANNUAL SALARY FOR PUBLIC SCHOOL TEACHERS, SELECTED YEARS, 1991-2001, STATE OF SOUTH CAROLINA

Thousands



Source: National Education Association,
Rankings of the States.
(Washington, D.C. NEA, Various Years).
United States Department of Commerce. CPI.

State's Commitment to Public Education K-12

- ❑ When the Education Finance Act funds are cut, the budget reductions disproportionately impact poorer districts because of this dependence on EFA funds.
- ❑ The State funded 70.9 percent of education in South Carolina in 1960; in now funds approximately 41.89 percent in 2002.
- ❑ The State, contrary to other states, has required districts to assume more of the cost of education over time.

State's Commitment to Public Education K-12

- The plaintiff school districts lacked funds to meet their student remedial and compensatory programs. No local or state money is available for after-hour programs or summer school leading to reliance on federal grants in order to serve a portion of the students who need such programs.

State's Commitment to Public Education K-12

- ❑ South Carolina has never attempted to determine what it costs to educate children in South Carolina, including children in the plaintiff districts.
- ❑ South Carolina has ignored studies performed by other groups which have advised the General Assembly that it is under funding education.

Key Idea: The legislature does a good job of enacting laws intended to promote education in South Carolina. It does a remarkably poor job of supporting the laws financially.

Facilities

- A question this Court must answer is whether school facilities are safe and adequate.
- We will offer testimony from school personnel and experts showing the facilities are not safe or adequate.
- We will also offer documentary and other tangible evidence to prove the facilities are neither safe, nor adequate, nor funded.

Key Idea: The facilities do not pass constitutional muster, as the evidence will show.

School Facilities

- The State periodically examines facilities' needs every three years, beginning in 1998. Both the 1998 and 2001 studies showed distressingly high facilities' deficiencies.
- The 2001 study by the State's Department of Education showed the following:

	1997/98	2000/01
Total Estimated Capital Needs	\$3,998,975,400	\$4,824,667,299
Plan/Scheduled Capital Improvements	\$1,424,958,600	\$2,042,125,678
Shortfall in Capital	\$2,574,016,800	\$2,782,541,621

School Facilities

- The relationship between facilities and student performance was reported by the Education Oversight Committee in its 2001 Report to the General Assembly. The EOC reported the following:

"One out of every five schools in this state is rated by the principal as having a direct negative impact on school productivity.

Among facilities factors adversely affecting the educational process are overcrowding, poor physical condition of the structure, portables, lack of storage, inadequate laboratory space.

Because (a) this study affirms previous research indicating that school facilities affect student outcomes, (b) one of every five schools in this state is rated as making a negative impact on the educational process, and (c) the average school facilities is 70% through its expected life cycle, it is recommended that a comprehensive and adequate system of funding school construction in South Carolina be developed and implemented"

(Report to The South Carolina General Assembly and The State Board of Education from The South Carolina Education Oversight Committee

March 1, 2002)

School Facilities

Key Idea: The State is not providing adequate facilities to students in S.C.

Schools In The Plaintiff Districts

Student Outcomes

The lack of sufficient educational inputs by the State, in addition to school buildings to be outlined in the next section, the districts lack, among other items to be covered at trial:

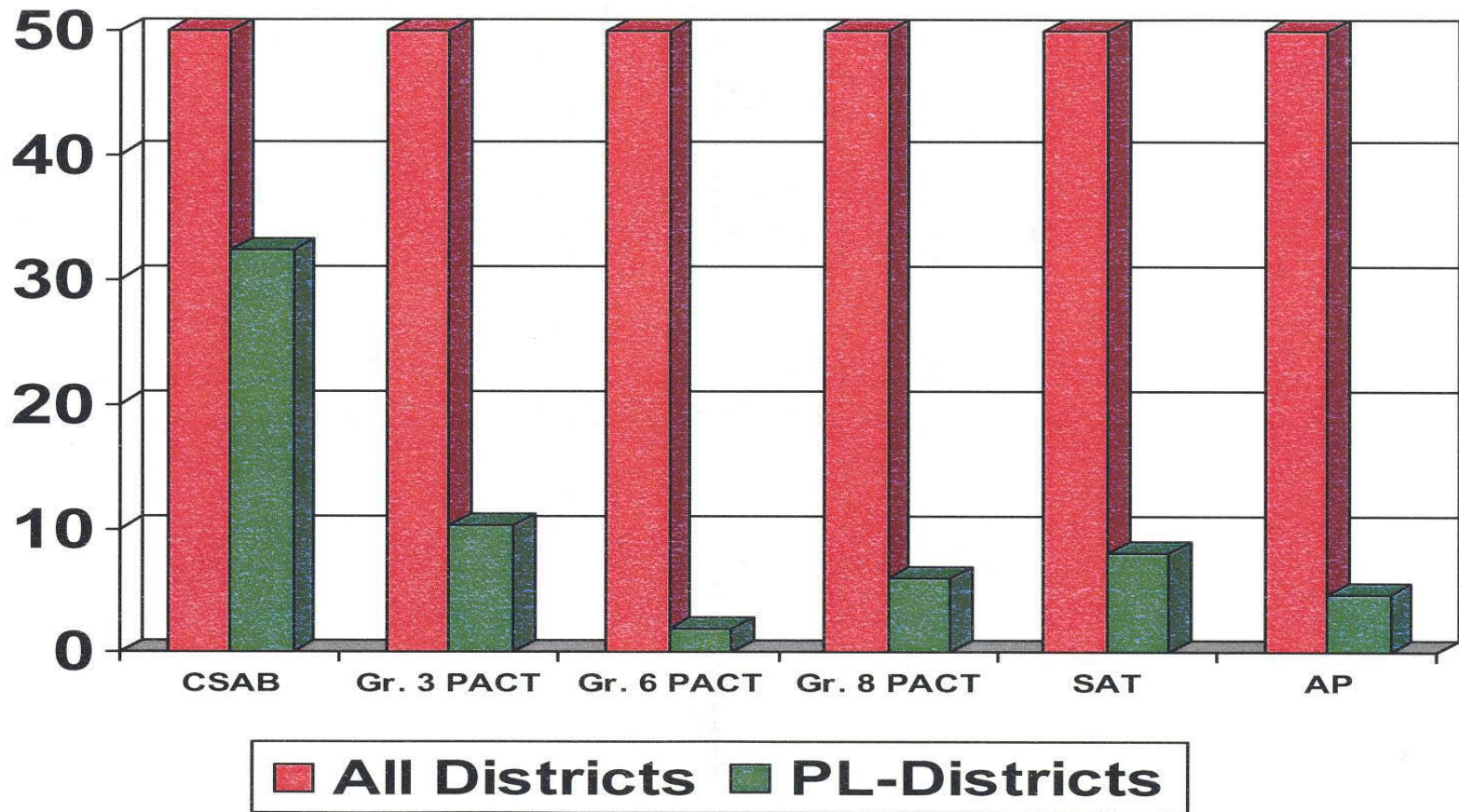
- Qualified teachers
- Instructional materials
- Usable technology
- Effective leaders in many instances
- Labs
- Transportation
- Compensatory and remedial programs
- Professional development for teachers and others
- Sufficient pre-school programs
- Sufficient library and media centers

Key Idea: Inputs cover the spectrum of programs, personnel and support.

Student Outcomes

- ❑ No matter what measure the court considers, whether by the state standards enunciated under the Education Accountability Act or cumulative measures, S.C.
- ❑ The State cannot argue that the children in the Plaintiff Districts have received an adequate education.
- ❑ In addition to the charts discussed in the “Demographics” discussion, consider the following statistical information:

Comparison of Test Data By Percentile



Note: Pact = 2002

CSAB, SAT, AP = 2001

Student Outcomes

Key Idea: The State will be hard pressed to even argue that Plaintiff students meet constitutionally sufficient educational outcomes.