

**PERFORMANCE AUDIT**

**DEPARTMENT OF HEALTH AND HUMAN SERVICES**

**DIVISION OF SERVICES**

**FOR THE DEAF AND THE HARD OF HEARING**

**(includes the Schools for the Deaf and Regional Resource Centers)**

**APRIL 2000**



# Office of the State Auditor



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## AUDITOR'S TRANSMITTAL

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April 13, 2000

The Honorable James B. Hunt, Jr., Governor  
Dr. H. David Bruton, Secretary  
Department of Health and Human Services  
Members of the North Carolina General Assembly

Ladies and Gentlemen:

We are pleased to submit this performance audit of the *Department of Health and Human Services, Division of Services for the Deaf and the Hard of Hearing*.

This report consists of an executive summary, operational findings and recommendations, and program overview. The objectives of the audit were to compare North Carolina's standard course of study and teaching methods for hearing impaired students to those of other states, examine admissions criteria and graduation requirements, compare performance of students at the Schools for the Deaf with deaf and hard of hearing students in the public schools, ascertain whether the work/school environment met applicable health and safety standards for the staff and students, examine organizational structure and staffing levels, and review operations for adequacy of controls and compliance with applicable laws and regulations. The Secretary of the Department of Health and Human Services has reviewed a draft copy of this report. His written comments are included as Appendix C, page 169.

We wish to express our appreciation to Secretary Bruton and his staff for the courtesy, cooperation, and assistance provided us during this effort.

Respectfully submitted,

A handwritten signature in black ink that reads "Ralph Campbell, Jr." in a cursive style.

Ralph Campbell, Jr.  
State Auditor





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**OFFICE OF THE NORTH CAROLINA STATE AUDITOR**  
PERFORMANCE AUDIT OF  
*THE DIVISION OF SERVICES FOR THE DEAF AND THE HARD OF HEARING*  
April 2000

## **EXECUTIVE SUMMARY**

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### **Program Description**

GS §143B-216.30 defines deafness as "the inability to hear and/or understand oral communication, with or without the assistance of amplification devices" and hard of hearing as "permanent hearing loss which is severe enough to necessitate the use of amplification devices to hear oral communication." Services to these populations in North Carolina can be traced back to the 1800's. The North Carolina School for the Deaf (NCSD) in Morganton was founded in 1891 and opened its doors to students in 1894. In 1965, the Eastern North Carolina School for the Deaf (ENCSD) opened in Wilson to better serve the educational needs in other parts of the state. As needs continued to increase as a result of the rubella outbreak in the 1950's and 1960's, the Central North Carolina School for the Deaf (CNCSD) began operation in 1975 in Greensboro.

Until 1972, NCSD administered deaf services in North Carolina under the leadership of the School's Board of Directors. As part of a reorganization of state agencies by the General Assembly, the schools were placed under the Department of Human Resources (now the Department of Health and Human Services) in the Division of Schools for the Deaf and Blind. The Division of Services for the Deaf and the Hard of Hearing (Division) was formally established as a separate division in 1989 to provide higher community visibility, public awareness, and expanded services to the estimated 650,000 deaf and hard of hearing citizens living in North Carolina. The Division took responsibility for the oversight of the three Schools for the Deaf, created regional resource centers throughout the State to provide local services to adults, and coordinated efforts in other areas such as early intervention services and telecommunication services. In 1999, the establishment of the Division of Early Intervention and Education Services removed responsibility for the Schools for the Deaf from the Division of Services for the Deaf and the Hard of Hearing and reunited these schools organizationally with the Governor Morehead School for the Blind.

### **Audit Scope and Methodology**

We employed various auditing techniques which adhere to the generally accepted auditing standards as promulgated in *Government Auditing Standards* issued by the Comptroller General of the United States to achieve the audit objectives. Due to the specialized nature of the educational services at the Schools for the Deaf, we engaged three educational consultants to report on national standards and industry "best practices" regarding deaf education. Additionally, we engaged an architectural firm to review and assess the physical condition of the campus for each school.

### **Audit Objectives**

This performance audit of the *Division of Services for the Deaf and the Hard of Hearing* included the three Schools for the Deaf and the seven regional resource centers, as well as the Division. An organizational review of the Division and the schools identified administrative and operational issues of concern that resulted in an expanded review. The performance audit focused on (1) education methods utilized by North Carolina as compared to other states, admissions and graduation requirements and statistics for the Schools for the Deaf versus those of the public school systems, (2) the health and safety standards in the work/school environment, (3) the organizational structure of the Division and schools, and (4) operational controls existing to ensure adequacy of reporting and accountability systems and compliance with regulations.

## EXECUTIVE SUMMARY (continued)

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**Conclusions in Brief** [NOTE: Throughout the report whenever we refer to the “Division,” we mean the Division of Services for the Deaf and the Hard of Hearing.]

- The consultants found that no single teaching method best serves all hearing impaired children. Rather, early identification and exposure to an accessible language is critical to later literacy development. The use of individual education programs for each child facilitates using differing methods on an individual basis so that parents, educators, and health specialists can best identify the appropriate method for each student.
- Course requirements at the Schools for the Deaf mirror those of the public schools. However, the students attending the Schools for the Deaf generally scored lower on end of grade tests than their hearing impaired counterparts mainstreamed into the public school system. Likewise, the graduation rates at the Schools for the Deaf were significantly lower than those of the mainstreamed hearing impaired students.
- Decreasing enrollment combined with increasing costs to operate and maintain the three schools for the deaf in North Carolina causes us to question the need for continuing to operate all three schools. As more students are mainstreamed, medical technology advances, and early intervention techniques become more available, the enrollment trends should continue downward. The costs to maintain the buildings and grounds of the campuses together with the architect's recommended improvements are significant. Consolidating operations would allow funds previously expended to operate three schools to be redirected to meet increased program and facility needs at the consolidated location(s).
- Hoskins, Scott & Partners, Inc., Architects, estimated funding needs of \$52 million to adequately address the necessary repairs, maintenance, and improvements of buildings at the Schools for the Deaf. While some of these needs result from normal wear and tear, more extreme cases occurred due to lack of attention to needs, lack of prioritization in the annual budgeting process by the Department or the General Assembly.
- Despite their identical purpose and mission, each school is structured differently with differences in the position classifications of like responsibilities and the placement of functions within sections or departments. We also found that the creation of the new Division of Early Intervention and Education Services causes the need for changes to the organizational structure of the Division of Services for the Deaf and the Hard of Hearing. Lastly, we noted that the regional resource center staffing patterns may lead to inconsistent provision of services.
- Operational and compliance concerns included the lack of effective planning, lack of communication, the absence of specific policies and procedures, and the need for increased training of staff. We noted instances of non-compliance with regulations regarding personnel file documentation, the time keeping system, payments for overtime and shift premium payroll, the fixed asset system, and budget preparation and analysis.

The Secretary of the Department of Health and Human Services reviewed the draft report. The Secretary's response is included as Appendix C, page 169.

## EXECUTIVE SUMMARY (continued)

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## EXECUTIVE SUMMARY (continued)

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### ***SPECIFIC FINDINGS (concluded)***

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A complete copy of this report can be found at [www.osa.state.nc.us](http://www.osa.state.nc.us), "Audits," "Performance Audits," "List of All Performance Audits." It is Report #185.

## AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY

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North Carolina GS §147-64 empowers the State Auditor with the authority to conduct performance audits of any State agency or program. Performance audits are reviews of activities and operations to determine whether resources are being used economically, efficiently, and effectively.

The performance audit of the Division of Services for the Deaf and the Hard of Hearing (Division), Department of Health and Human Services (Department), grew out of a financial audit of the Division. Based on inconsistencies found in the organizational structure of the three Schools for the Deaf<sup>1</sup> within the Division, we undertook an organizational review of the Division and the Schools. As the review progressed, we identified administrative and operational issues of concern that resulted in an expanded review.

The specific objectives of this performance audit were to:

- Compare North Carolina's standard course of study and teaching methods for hearing impaired students to those of other states; examine admissions criteria, requirements of Public Law (PL) 94-142, and graduation requirements; compare performance of students at the Schools for the Deaf with deaf and hard of hearing students in the public schools; and determine costs per student.
- Ascertain whether the work/school environment met applicable health and safety standards for the staff and students, including an architect's review of physical plant needs.
- Determine the current organizational structure and identify the functions and responsibilities of the Division of Services for the Deaf and Hard of Hearing, the regional resource centers, the Schools for the Deaf, and the newly formed Division of Early Intervention and Education; and to evaluate staffing levels.
- Review operations for adequacy of controls, adequacy of reporting and accountability systems, and compliance with applicable laws and regulations.

The scope of the audit encompassed all aspects of the operations of the Division including the three schools and seven regional resource centers. In addition, the function of the Council for the Deaf and the Hard of Hearing was included to the extent necessary to conduct the review of the Division.

During the period May through December 1999, we conducted the fieldwork for the performance audit of the Division. To achieve the audit objectives, we employed various auditing techniques which adhere to the generally accepted auditing standards as promulgated in *Government Auditing Standards* issued by the Comptroller General of the United States. These techniques included:

- Review of existing General Statutes and the North Carolina Administrative Code as they relate to the Department, Division, and Schools for the Deaf.
- Review of policies and procedures of the Department, Division, and Schools for the Deaf.
- On-site, in-depth interviews of 49 staff members of the Division and 167 employees at the Schools.
- Review of existing studies and reports on the Division or Schools.

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<sup>1</sup> During the audit, the General Assembly established a new Division of Early Intervention and Education within the Department of Health and Human Services. As of October 1999, the administrative responsibilities of the three Schools for the Deaf were moved from the Division of Services for the Deaf and the Hard of Hearing to this new Division.

## AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY

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- Analysis of available financial data and statistical information.
- Examination of a sample of employee personnel files including hiring packets, job descriptions, time sheets, performance evaluations, and grievance files.
- Observation and inspection of a sample of fixed assets.
- Review of contracts between the Schools and private, not-for-profit facilities for pre-school facilities.
- Examination of a sample of student files including Individualized Education Programs, admission documents, and transcripts.
- Review of reports regarding accidents and/or incidents.
- Observation of buildings and their physical condition.
- Comparison of methods utilized in other states to educate deaf and hard-of-hearing students.

Due to the specialized nature of the educational services provided by the Schools for the Deaf, the State Auditor decided to use the services of outside consultants in two areas of this audit. To this end, we engaged three experts in the area of deaf education to help us understand the current "best practices" in other states. A summary of their work is included on pages 7 through 9 and Appendix A, page 67. The second area where we engaged the services of an outside consultant was in the review and assessment of the physical condition and safety considerations for each of the schools. Those conclusions can be found starting on page 89.

This report contains the results of the audit as well as specific recommendations aimed at improving the operations of the two divisions, the schools, and the regional resource centers in terms of economy, efficiency, and effectiveness. Because of the test nature and other inherent limitations of an audit, together with the limitations of any system of internal and management controls, this audit would not necessarily disclose all weaknesses in the system or lack of compliance. Also, projection of any of the results contained in this report to future periods is subject to the risk that procedures may become inadequate due to changes in conditions and/or personnel, or that the effectiveness of the design and operation of the policies and procedures may deteriorate.

## FINDINGS AND RECOMMENDATIONS

### EDUCATION STANDARDS AND PERFORMANCE

**Objective:** Compare North Carolina's standard course of study and teaching methods for hearing impaired students to those of other states; examine admissions criteria, requirements of Public Law (PL) 94-142, and graduation requirements; compare performance of students at the Schools for the Deaf with deaf and hard of hearing students in the public schools; and determine costs per student.

| TABLE 1<br>STATES SURVEYED |     |             |
|----------------------------|-----|-------------|
| State                      | OSA | Consultants |
| Arizona                    |     | X           |
| California                 | X   | X           |
| Colorado                   |     | X           |
| Florida                    | X   | X           |
| Georgia                    | X   | X           |
| Indiana                    |     | X           |
| Illinois                   |     | X           |
| Kansas                     |     | X           |
| Kentucky                   | X   |             |
| Maryland                   | X   | X           |
| Minnesota                  |     | X           |
| Missouri                   |     | X           |
| New York                   | X   | X           |
| North Carolina             | X   |             |
| Ohio                       | X   |             |
| Oklahoma                   |     | X           |
| Oregon                     | X   |             |
| Pennsylvania               |     | X           |
| South Carolina             | X   | X           |
| Tennessee                  | X   |             |
| Texas                      | X   | X           |
| Utah                       | X   |             |
| Virginia                   | X   | X           |
| Washington                 | X   |             |
| Source: Compiled by OSA    |     |             |

To determine how North Carolina's efforts in deaf education compare to those of other states, the Office of the State Auditor surveyed 14 states early in the audit process, receiving responses from nine. The survey provided comparative data regarding organizational structure, statistical data, personnel requirements, and educational programs. (See Appendix A, page 67 for detailed results.)

As the responses were reviewed, we realized that, because of the specialized nature of the services offered by schools for the deaf, it was desirable to have specialists in this field assist us. Therefore, the State Auditor contracted with three outside experts. The experts were asked to survey and determine the status of various functions in 17 states, including eight states from the original survey conducted by the State Auditor. (See Table 1.) The results of the consultants' work are summarized in Appendix A on page 71. In total, we gathered data from 23 states for comparison with North Carolina.

To determine the educational standards and review the educational performance of students at the Schools for the Deaf, we gathered data from the Schools, the North Carolina Department of Public Instruction (DPI), and other states. Specifically, we obtained policies and procedures and State and Federal regulations regarding admissions, graduation, standard course of study, and student file documentation. Schools for the Deaf course offerings and graduation requirements were compared to those established by the State Board of Public Instruction for public schools. Next, we obtained a sample of student files from the Schools for the Deaf and examined those records to determine whether students met admission requirements. Student files were also reviewed for compliance with PL94-142 requirements for Individualized Education Programs (IEP) and transcript maintenance. Performance of students attending the

## FINDINGS AND RECOMMENDATIONS

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Schools for the Deaf was measured against statistical information for deaf and hard of hearing students attending public schools. Lastly, we examined total expenditures by school and compared the changes in costs to the changes in enrollment.

**Conclusion:** Based on the work submitted by the consultants, it appears that no one teaching method is best for all deaf and hard of hearing children. Additionally, it was determined that no national health and safety standards exist specifically for schools for the deaf. However, all requirements of the Americans with Disabilities Act apply to schools for the deaf. Lastly, when compared to other states, North Carolina's Schools for the Deaf are in line with the percentage of deaf and hearing impaired students mainstreamed in public schools, teaching methods employed by other schools for the deaf, accepted courses of study, and general operational procedures such as background checks for employees and incident reporting systems.

Examination of admissions data for the Schools for the Deaf showed that total admissions have been decreasing since a high of 798 in 1993. However, costs per student have increased 96% within the last ten years. End of grade testing for mainstreamed deaf and hard of hearing students and students at the Schools for the Deaf showed significant differences in rates of passing, with the Schools for the Deaf scores much lower on average. The number of students graduating from the Schools for the Deaf was also significantly lower than for those students mainstreamed in public schools. In general, the educational requirements of the Schools for the Deaf mirror those of the public schools. Students admitted to the Schools for the Deaf met the criteria established for the schools and file documentation generally supported those decisions, as well as the education plans developed for each student. However, we found instances of non-compliance with PL94-142 documentation requirements for Individual Education Programs (IEPs) at the Schools for the Deaf.

### **NO ONE TEACHING METHOD IS BEST FOR ALL DEAF AND HARD OF HEARING CHILDREN.**

The State Auditor asked the three consultants<sup>2</sup> several specific questions relative to deaf education. First, which teaching method offers deaf students the most benefits? Second, which teaching method is the most progressive? All the consultants agreed that there is no one approach for determining the best teaching/communication method that will offer the most benefit to all deaf and hard of hearing children. They did agree, however, that early exposure to an accessible language is critical to later literacy development. Based on their

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<sup>2</sup> Dr. Sharon Baker, University of Tulsa; Dr. Joyce Buckler, Fontbonne College, St. Louis, Mo.; and Dr. Reginald Redding, Gallaudet University, Washington, DC. See Appendix A, page 71 for complete reports.

## FINDINGS AND RECOMMENDATIONS

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research and experience, Drs. Baker and Redding felt that the bilingual approach<sup>3</sup> was the most beneficial teaching method for the majority of deaf and hard of hearing students. Dr. Buckler felt the auditory-oral approach<sup>4</sup> offers the most benefit in that it facilitates the development of spoken language through listening in order to prepare students to mainstream with their normally hearing peers.

As to the most progressive teaching methods, here again our consultants split, with Drs. Baker and Redding reporting that the bilingual approach is the most progressive. According to Dr. Baker, research has shown that deaf children learn visually through their unimpaired visual channel more efficiently than through impaired auditory pathways. Dr. Redding agreed, saying that the majority of deaf children are not able to utilize their residual hearing to aid with their acquisition of language in the same way as their hearing counterparts. Dr. Buckler, on the other hand, believes the auditory-oral approach to be the most progressive. She reported that a recent study conducted by the Research Institute of Gallaudet University showed that auditory-oral adolescents achieved significantly higher levels of literacy. Additionally, Dr. Buckler reported that profoundly deaf children with hearing aids and cochlear implants have been successfully mainstreamed.

Additionally, the consultants reported that no national health and safety standards exist specifically for Schools for the Deaf, but that all requirements of the Americans with Disabilities Act apply. The consultants also found that North Carolina's Schools for the Deaf are in line with the percentage of hearing impaired students mainstreamed in public schools. Further, North Carolina employs a number of different teaching methods at its Schools for the Deaf that are consistent with current "best practices." As with most other states, North Carolina uses the standard course of study developed by the State Department of Public Instruction, modifying it to fit the needs of each deaf and hard of hearing student. Lastly, the consultants found that while there was no consensus on systems, North Carolina has established sound operational procedures such as background checks for employees and incident reporting systems.

### RECOMMENDATION

**The Department should carefully review the data gathered by the consultants and consider which method(s) to employ in the North Carolina Schools for the Deaf. We encourage the Department to continue to explore different methods of instruction based on the needs of each individual student.**

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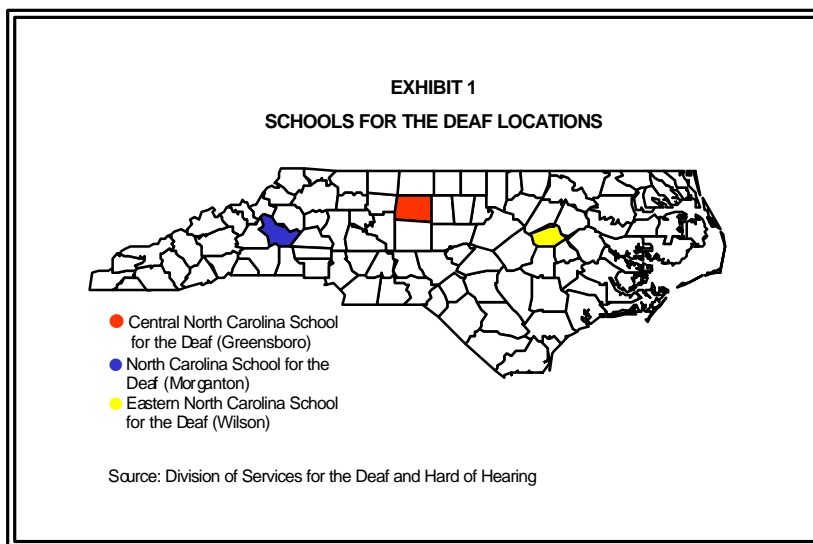
<sup>3</sup> Bilingual approach teaches American Sign Language as a first language and English as a second language.

<sup>4</sup> Auditory-oral approach is a method in which children learn to use their residual hearing in combination with contextual cues (speechreading) to understand and use spoken language.

## FINDINGS AND RECOMMENDATIONS

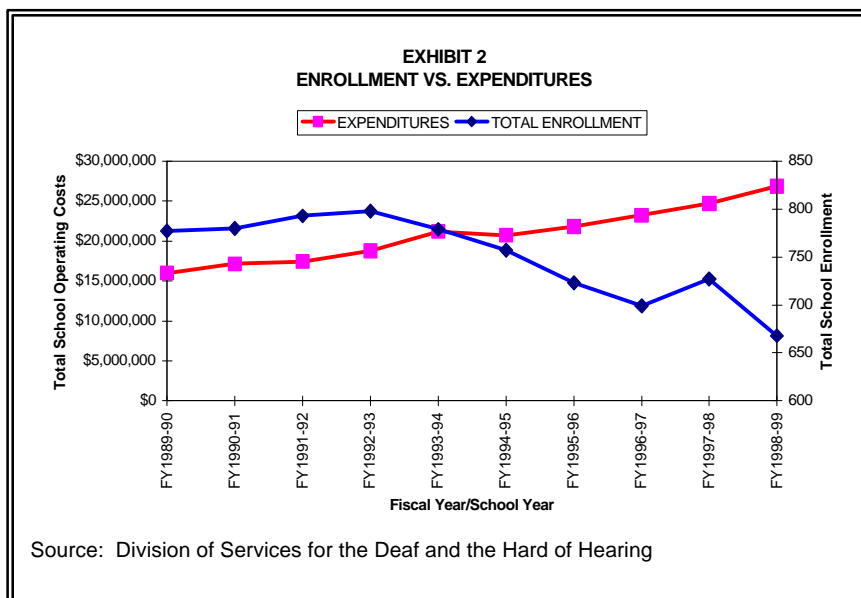
### THE NUMBER OF STUDENTS CURRENTLY ATTENDING THE SCHOOLS FOR THE DEAF DOES NOT JUSTIFY THE COSTS OF OPERATING THREE SCHOOLS.

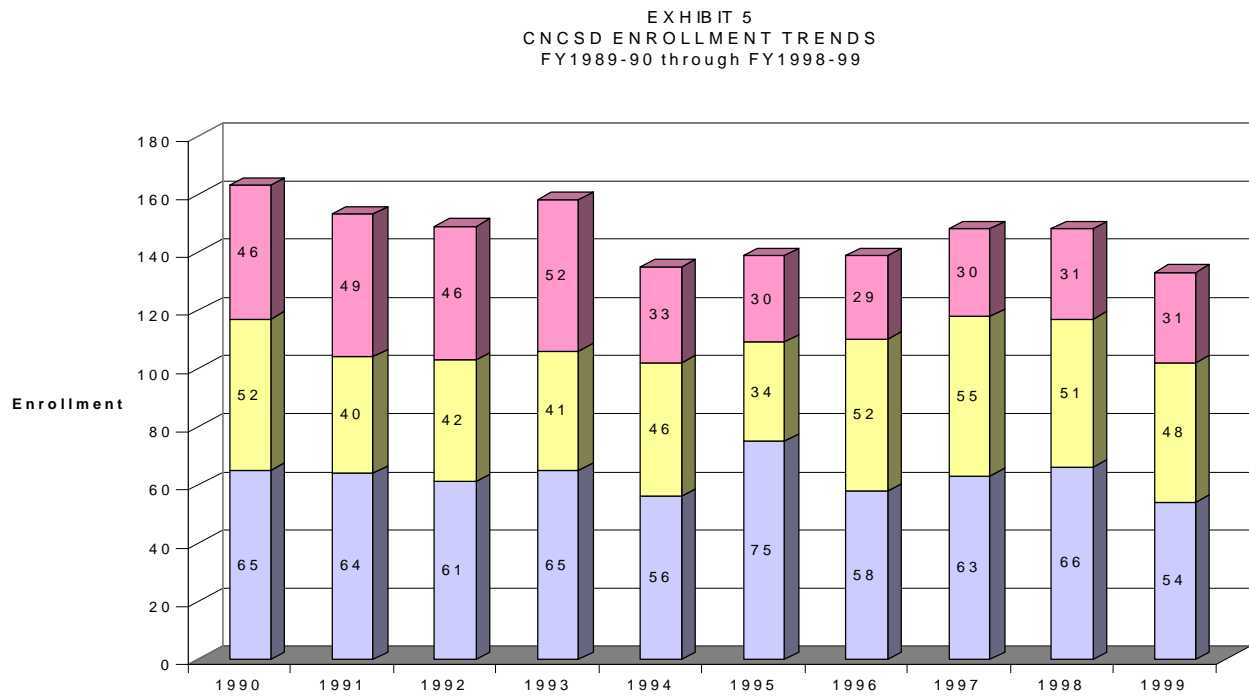
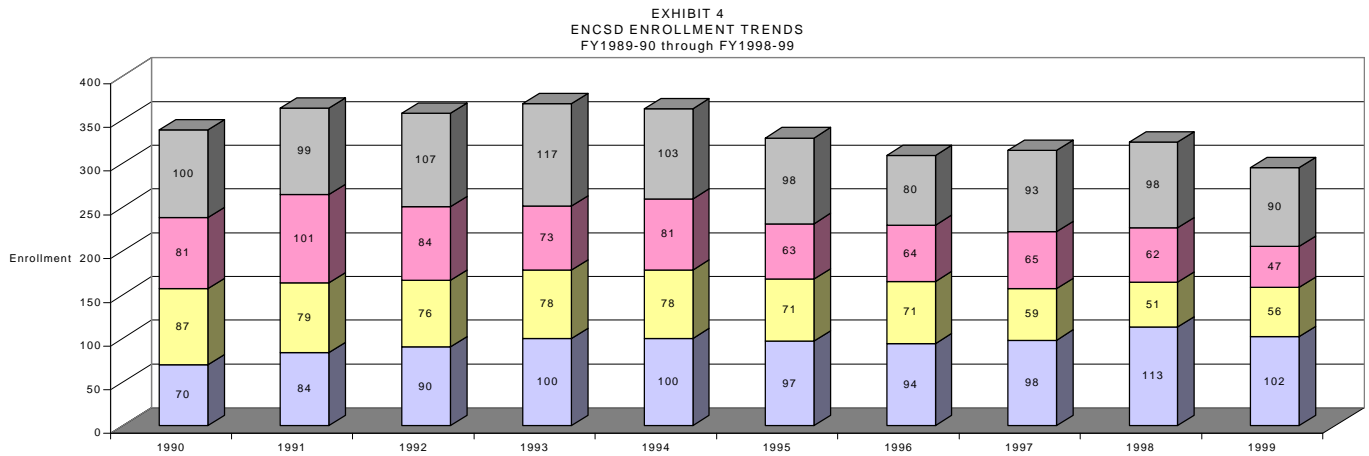
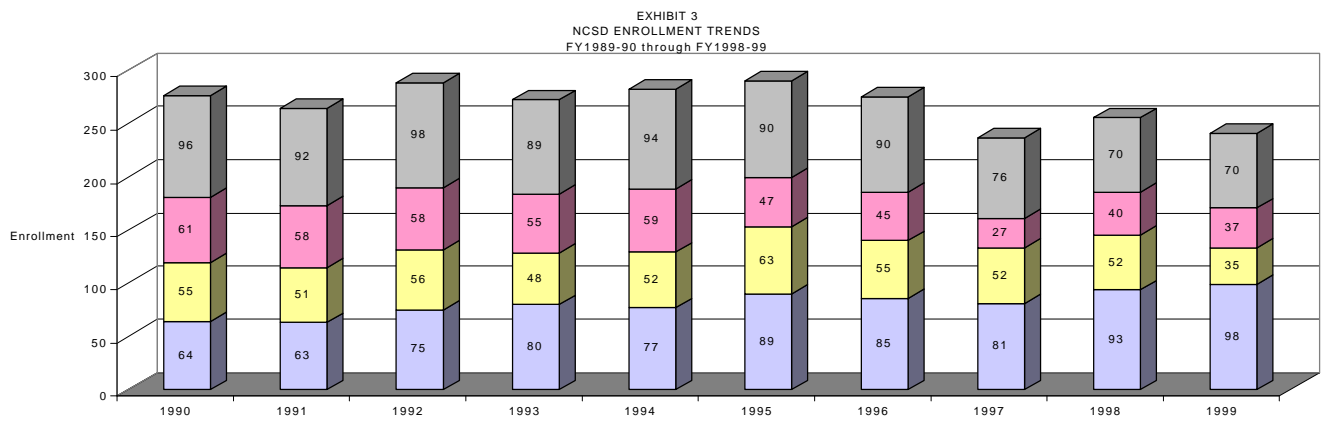
Currently, North Carolina operates three separate Schools for the Deaf—the *North Carolina School for the Deaf* (NCSD) located in Morganton; the *Central North Carolina School for the Deaf* (CNCSD) located in Greensboro; and the *Eastern North Carolina School for the Deaf* (ENCSD) located in Wilson. (See Exhibit 1.) Enrollment at each of the Schools for the



Deaf has dropped steadily over the past ten years from a total enrollment of 777 in 1989-90 to 668 in 1998-99, a 14% decrease. Yet, total operating costs have increased 68% for the same time period. Exhibit 2 shows the changes in total enrollment versus the changes in total expenditures. Exhibits 3 through 5, page 11, show the changes in enrollment by school. Among the

reasons for the decreasing enrollment are advances in medical technology, early intervention techniques, and Federal policies to mainstream as many children as possible. Over this time period, the total preschool enrollment actually increased from 199 to 254 students. Excluding the preschools, the enrollment decline is more dramatic, with the number of students in grades K-12 dropping from 578 to 414 in ten years, a 28% decrease.





■ Preschool
 ■ Elementary School
 ■ Middle School
 ■ High School

Source for Exhibits 3 through 5: Division of Services for the Deaf and the Hard of Hearing

## FINDINGS AND RECOMMENDATIONS

While enrollment has been declining since FY1992-93, costs to maintain and operate each school have risen. As shown in Table 2, combined total budgeted expenditures grew from \$15,995,964 in FY1989-90 to \$26,892,789, a 68% increase. (See Table 12, page 61 for a more detailed breakdown of costs.) Table 2 shows that the cost per student increased from \$20,587 in FY1989-90 to \$40,259 in FY1998-99, a 96% increase. Comparing the cost of educating hearing-impaired students at the Schools for the Deaf to mainstreaming them into the public school system is difficult. The Schools for the Deaf are residential schools that serve a relatively small number of students. This causes a high cost per student. When hearing-impaired students are mainstreamed into a public school, the additional cost incurred per student is much lower. It also removes the cost of housing the students. A barrier to precisely determining the cost of mainstreaming hearing-impaired students is the fact that DPI tracks expenditures by type of service provided and not the type of student to whom it was provided. For example, expenditures charged to "Speech, Pathology, and Audiology Services" are not exclusively for hearing-impaired students.

| <b>TABLE 2<br/>SCHOOLS FOR THE DEAF<br/>COSTS PER STUDENT<br/>FY1989-90 THROUGH FY 1998-99</b> |                     |                     |                     |                     |                     |                     |                     |                     |                     |                     |
|--|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|
|  | FY<br>1989-90       | FY<br>1990-91       | FY<br>1991-92       | FY<br>1992-93       | FY<br>1993-94       | FY<br>1994-95       | FY<br>1995-96       | FY<br>1996-97       | FY<br>1997-98       | FY<br>1998-99       |
| <b>NCSD:</b>   |                     |                     |                     |                     |                     |                     |                     |                     |                     |                     |
| Expenditures   | \$ 6,362,824        | \$ 6,596,842        | \$ 6,840,489        | \$ 7,437,222        | \$ 8,356,519        | \$ 8,186,447        | \$ 8,486,574        | \$ 8,669,287        | \$ 9,154,777        | \$ 9,755,140        |
| Total Enrollment   | 276                 | 264                 | 287                 | 272                 | 282                 | 289                 | 275                 | 236                 | 255                 | 240                 |
| Cost Per Student   | \$ 23,054           | \$ 23,902           | \$ 25,911           | \$ 25,914           | \$ 30,722           | \$ 29,030           | \$ 29,365           | \$ 31,525           | \$ 38,791           | \$ 38,255           |
| <b>ENCSD:</b>  |                     |                     |                     |                     |                     |                     |                     |                     |                     |                     |
| Expenditures   | \$ 6,377,707        | \$ 7,122,718        | \$ 7,042,785        | \$ 7,492,569        | \$ 8,490,128        | \$ 8,517,888        | \$ 9,131,936        | \$ 9,786,347        | \$10,486,324        | \$11,533,574        |
| Total Enrollment   | 338                 | 363                 | 357                 | 368                 | 362                 | 329                 | 309                 | 315                 | 324                 | 295                 |
| Cost Per Student   | \$ 18,869           | \$ 19,622           | \$ 19,728           | \$ 20,360           | \$ 23,453           | \$ 25,890           | \$ 29,553           | \$ 31,068           | \$ 32,365           | \$ 39,097           |
| Expenditures   | \$ 3,255,433        |                     | \$ 3,565,996        | \$ 3,853,059        |                     | \$ 4,044,403        | \$ 4,212,970        |                     | \$ 5,057,243        | \$ 5,604,075        |
| Total Enrollment   | 163                 | 153                 | 149                 | 158                 | 135                 | 139                 | 139                 | 148                 | 148                 | 133                 |
| Cost Per Student   | \$ 19,972           | \$ 22,346           | \$ 23,933           | \$ 24,386           | \$ 32,391           | \$ 29,096           | \$ 30,309           | \$ 32,306           | \$ 34,171           | \$ 42,136           |
| <b>Total Expenditures</b>  | <b>\$15,995,964</b> | <b>\$17,138,469</b> | <b>\$17,449,270</b> | <b>\$18,782,850</b> | <b>\$21,219,374</b> | <b>\$20,748,738</b> | <b>\$21,831,480</b> | <b>\$23,236,922</b> | <b>\$24,698,344</b> | <b>\$26,892,789</b> |
| <b>Total Enrollment</b>  | <b>777</b>          | <b>780</b>          | <b>793</b>          | <b>798</b>          | <b>779</b>          | <b>757</b>          | <b>723</b>          | <b>699</b>          | <b>727</b>          | <b>668</b>          |
| <b>Cost Per Student</b>  |                     | <b>\$ 21,972</b>    | <b>\$ 22,004</b>    |                     | <b>\$ 27,239</b>    | <b>\$ 27,409</b>    |                     | <b>\$ 33,243</b>    | <b>\$ 33,973</b>    |                     |

Source: Division of Services for the Deaf and the Hard of Hearing

Examination of enrollment data shows that approximately two out of three students attending North Carolina's Schools for the Deaf are residential students. These students are transported to the school on Sunday evening and return home on Friday afternoon. A significant reason for continuing to operate all three schools is the proximity of regional schools to the students' homes. Having three schools shortens the distance children must travel weekly and allows increased parental involvement in their children's education. However, the costs to maintain and operate the buildings and grounds of three campuses are quite high. Additionally, as discussed on page 20, the architect's estimated costs to make the recommended improvements for continued operation are significant. By consolidating students, perhaps into two schools, funds previously expended for operation of the three schools could be redirected to the other school(s) to meet increasing needs.

## **FINDINGS AND RECOMMENDATIONS**

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### **RECOMMENDATION**

The Department should consider closing one or more of the Schools for the Deaf and integrating those students into the remaining school(s). Management should analyze the projected student population over the next ten years in determining the need for three schools. In our opinion, there are several options that should be carefully considered. One option would be to close the Central North Carolina School for the Deaf (Greensboro) since it does not serve high school students and merge these students into the other two schools. Additionally, as the newest of the physical plants, this location offers more opportunity for alternative uses of the facility such as a transitional living facility for deaf students. A second option would be to close the North Carolina School for the Deaf (Morganton) since it will be the most costly to renovate and repair. (See Architect's report on page 89.) Still a third option to consider would be to close two of the schools and merge all students into one location. This option would free up the most operational funds, allowing all renovations and repairs to be made to the campus chosen as the ultimate location. In all options, funds used to operate the school(s) closed could be invested into operation, maintenance, and improvement of the remaining school(s).

### **MAINSTREAMED DEAF AND HARD OF HEARING STUDENTS ARE PASSING THE END-OF-GRADE TESTS AT A HIGHER RATE THAN ARE STUDENTS FROM THE SCHOOLS FOR THE DEAF.**

In 1998, the General Assembly determined that the North Carolina Schools for the Deaf should meet the same educational and testing standards required of public schools. We compared the end-of-grade test scores for deaf and hard of hearing students who had been mainstreamed in the public schools to those scores for students from the Schools for the Deaf for the same grade level. Table 3, page 14 shows the number of students tested at grades three through eight, the percent passing, and the average score on the end-of-grade reading and math tests. Exhibits 6 through 8 starting on page 15 graphically show how the students fared on these tests for each of the fiscal years examined. For the period FY1995-96 through FY1997-98, a greater percentage of mainstreamed deaf and hard of hearing students passed the end-of-grade tests than did students from the Schools for the Deaf.

### **RECOMMENDATION**

The Department and the Division of Early Intervention and Education should carefully evaluate the end-of-grade tests for students of the Schools for the Deaf. With assistance from the Department of Public Instruction, the Division should examine the course of study at each of the three Schools for the Deaf and determine whether the schools are adequately meeting the standard requirements. Specific attention should be given to the areas included in end-of-grade tests, with consideration as to whether

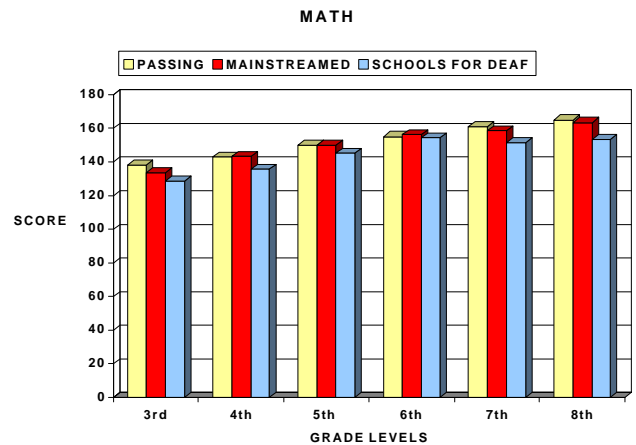
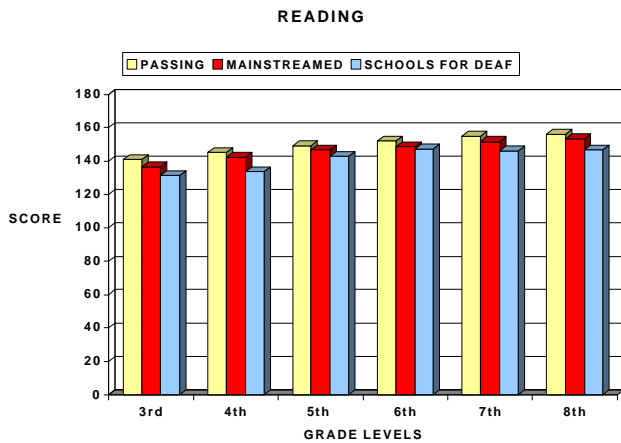
## FINDINGS AND RECOMMENDATIONS

additional resources are needed at the Schools for the Deaf to meet these requirements.

| TABLE 3<br>COMPARISON OF STUDENT RESULTS<br>END OF GRADE TEST SCORES<br>FY1995-96 THROUGH FY1997-98                |                         |      |                     |               |                   |               |                               |                 |               |    |                   |               |       |
|--|-------------------------|------|---------------------|---------------|-------------------|---------------|-------------------------------|-----------------|---------------|----|-------------------|---------------|-------|
| FY1995-96  |                         |      |                     |               |                   |               |                               |                 |               |    |                   |               |       |
|  | Level III Passing Score |      | Mainstream Students |               |                   |               | Schools for the Deaf Students |                 |               |    |                   |               |       |
|  | Reading                 | Math | Number Students     | Number Tested | Percent Level III | Average Score |                               | Number Students | Number Tested |    | Percent Level III | Average Score |       |
| 3rd Grade  |                         | 138  | *                   |               | 23.9%             | 136.4         |                               | *               | 31            |    | 0.0%              | 131.3         |       |
| 4th Grade  | 145                     | 143  | *                   | 115           | 31.6%             | 142.5         | 143.2                         | *               | 28            | 29 | 3.4%              | 133.9         | 135.7 |
| 5th Grade  | 149                     | 150  | *                   | 124           | 37.0%             | 146.6         | 149.9                         | *               | 9             | 11 | 0.0%              | 142.9         | 145.4 |
|  | 152                     | 155  |                     | 101           | 34.3%             |               | 156.3                         | *               |               | 5  | 20.0%             |               | 154.4 |
| 7th Grade  | 155                     |      | *                   | 136           |                   | 151.7         | 158.4                         |                 | 13            | 13 |                   | 146.1         | 151.4 |
| 8th Grade  | 156                     | 165  | *                   | 124           | 28.3%             | 153.3         | 163.6                         | *               | 28            | 27 | 3.6%              | 146.7         | 153.5 |
| * = data not available   |                         |      |                     |               |                   |               |                               |                 |               |    |                   |               |       |
| FY1996-97  |                         |      |                     |               |                   |               |                               |                 |               |    |                   |               |       |
|  | Level III Passing Score |      | Mainstream Students |               |                   |               | Schools for the Deaf Students |                 |               |    |                   |               |       |
|  | Reading                 | Math | Number Students     | Number Tested | Percent Level III | Average Score |                               | Number Students | Number Tested |    | Percent Level III | Average Score |       |
| 3rd Grade  | 141                     | 138  | 158                 | 142           | 31.7%             | 137.7         | 135.7                         | *               | 34            | 34 | 2.9%              | 130.2         | 127.3 |
| 4th Grade  | 145                     | 143  | 150                 | 129           | 33.3%             | 142.1         | 142.9                         | *               | 28            | 28 | 3.6%              | 134.4         | 134.6 |
| 5th Grade  | 149                     | 150  | 157                 | 133           | 30.8%             | 146.9         | 150.2                         | *               | 9             | 9  | 0.0%              | 139.5         | 142.9 |
| 6th Grade  | 152                     | 155  | 158                 | 147           | 32.0%             | 149.7         | 156.2                         | *               | 4             | 4  | 0.0%              | 147.0         | 156.0 |
|  | 155                     | 161  | 130                 | 120           | 31.1%             | 151.2         | 160.7                         | *               | 13            | 13 | 7.7%              | 144.5         | 151.7 |
|  | 156                     | 165  |                     | 126           | 31.7%             |               | 163.0                         | *               |               | 27 | 0.0%              |               | 151.4 |
| * = data not available   |                         |      |                     |               |                   |               |                               |                 |               |    |                   |               |       |
|  |                         |      |                     |               |                   |               |                               |                 |               |    |                   |               |       |
|  | Level III Passing Score |      | Mainstream Students |               |                   |               | Schools for the Deaf Students |                 |               |    |                   |               |       |
|  | Reading                 | Math | Number Students     | Number Tested | Percent Level III | Average Score |                               | Number Students | Number Tested |    | Percent Level III | Average Score |       |
| 3rd Grade  | 141                     | 138  | 138                 | 112           | 21.6%             | 137.2         | 134.0                         | 36              | 32            | 32 | 0.0%              | 126.9         | 120.4 |
| 4th Grade  | 145                     | 143  | 161                 | 139           | 35.6%             | 142.8         | 144.5                         | 34              | 32            | 32 | 0.0%              | 132.8         | 131.0 |
| 5th Grade  | 149                     | 150  | 163                 | 138           | 44.1%             | 148.3         | 150.9                         | 38              | 28            | 28 | 3.6%              | 137.1         | 138.0 |
| 6th Grade  | 152                     | 155  | 131                 | 118           | 37.6%             | 149.4         | 156.5                         | 23              | 17            | 17 | 5.9%              | 140.9         | 144.9 |
| 7th Grade  | 155                     | 161  | 118                 | 105           | 31.7%             | 152.8         | 161.8                         | 23              | 18            | 18 | 5.6%              | 144.2         | 154.2 |
| 8th Grade  | 156                     | 165  | 116                 | 108           | 34.3%             | 153.7         | 165.3                         | 34              | 26            | 26 | 7.7%              | 145.5         | 156.7 |
| * = data not available   |                         |      |                     |               |                   |               |                               |                 |               |    |                   |               |       |
| Sources: DPI "State Test Results" and "End of Year Reports" (Unaudited), Schools for the Deaf testing coordinators |                         |      |                     |               |                   |               |                               |                 |               |    |                   |               |       |

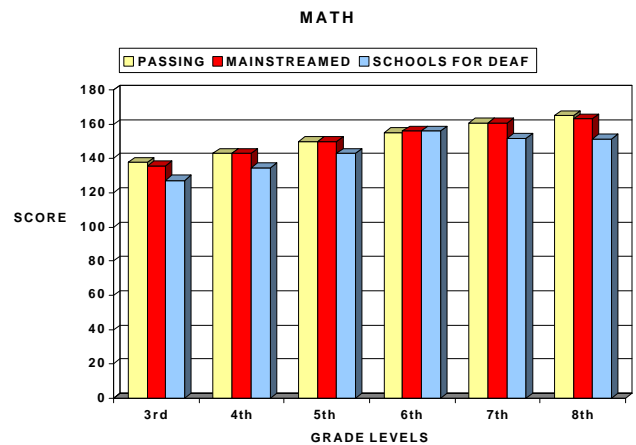
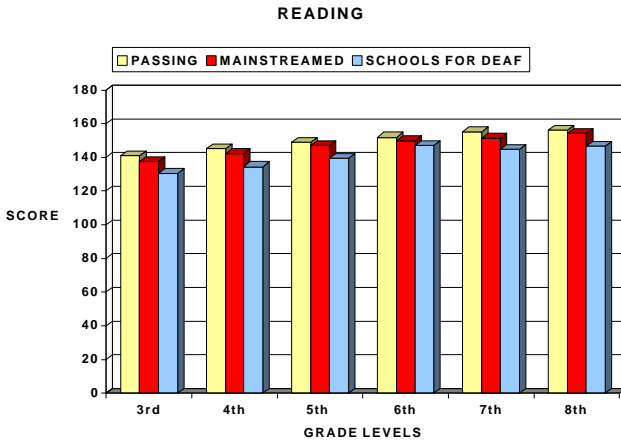
# FINDINGS AND RECOMMENDATIONS

**EXHIBIT 6**  
**END-OF-GRADE AVERAGE SCORES--FY1995-96**



Source: Department of Public Instruction and Schools for the Deaf

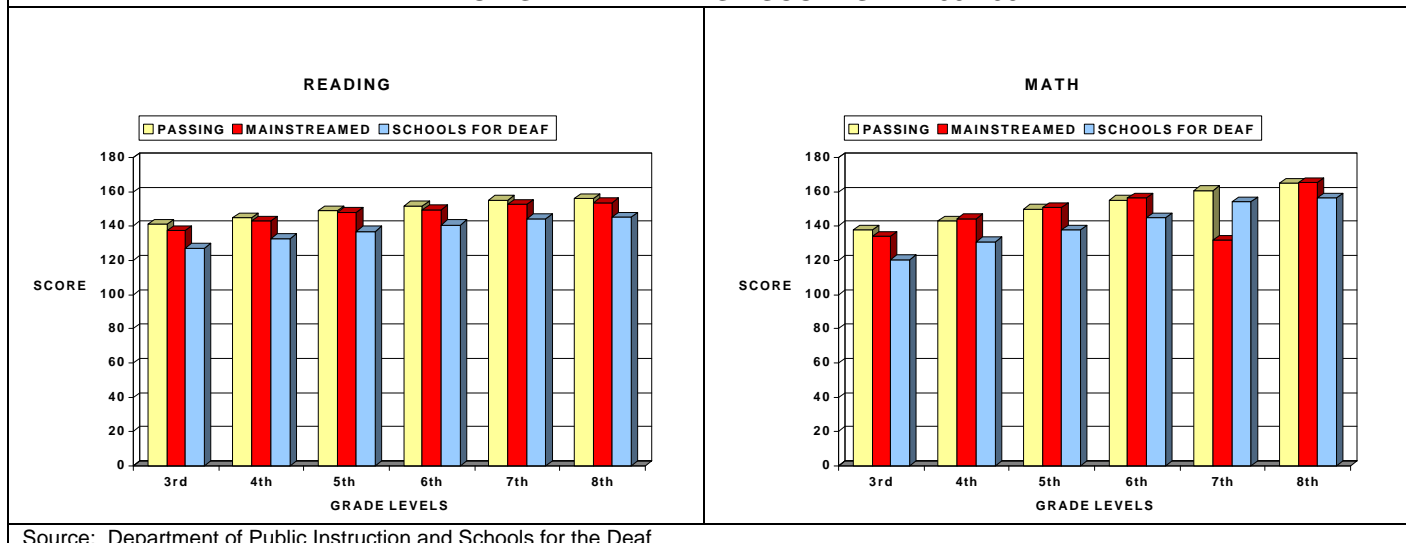
**EXHIBIT 7**  
**END-OF-GRADE AVERAGE SCORES--FY1996-97**



Source: Department of Public Instruction and Schools for the Deaf

## FINDINGS AND RECOMMENDATIONS

**EXHIBIT 8  
END-OF-GRADE AVERAGE SCORES--FY1997-98**



### **MORE MAINSTREAMED DEAF AND HARD OF HEARING STUDENTS RECEIVE DIPLOMAS THAN DO STUDENTS FROM THE SCHOOLS FOR THE DEAF.**

We examined graduation results for mainstreamed deaf and hard of hearing students and for students from the Schools for the Deaf for Fiscal Years 1995-96 through 1997-98. The results show that a larger percentage of the mainstreamed deaf students received diplomas as opposed to graduation certificates or certificates of attendance. Graduation certificates are given to students who pass the standard course of study but do not pass the North Carolina competency tests. Certificates of attendance are awarded to students who complete the twelfth grade and attend school regularly but have not followed or completed the standard course of study. The IEP for these students may have exempted them from the standard

| TABLE 4<br>COMPARISON OF STUDENT RESULTS<br>GRADUATION RESULTS<br>FY1995-96 THROUGH FY1997-98                            |                         |            |                      |            |                         |            |                      |            |                         |            |                      |            |
|--|-------------------------|------------|----------------------|------------|-------------------------|------------|----------------------|------------|-------------------------|------------|----------------------|------------|
|  | FY1995-96               |            |                      |            | FY1996-97               |            |                      |            | FY1997-98               |            |                      |            |
|  | Mainstream Students (3) |            | Deaf School Students |            | Mainstream Students (3) |            | Deaf School Students |            | Mainstream Students (3) |            | Deaf School Students |            |
| Type of Diploma/Certificate  | No.                     | % of Total | No.                  | % of Total | No.                     | % of Total | No.                  | % of Total | No.                     | % of Total | No.                  | % of Total |
| Diploma  | 38                      | 90%        | 23                   | 59%        | 47                      | 100%       | 12                   | 33%        | 73                      | 71%        | 15                   | 36%        |
| Graduation Certificate (1), (2)  | 4                       | 10%        | 4                    | 10%        | 0                       | 0%         | 1                    | 3%         | 30                      | 29%        | 7                    | 17%        |
| Certificate of Attendance (1)  | 0                       | 0%         | 12                   | 31%        | 0                       | 0%         | 23                   | 64%        | 0                       | 0%         | 20                   | 48%        |
| Total  | 42                      | 100%       | 39                   | 100%       | 47                      | 100%       | 36                   | 100%       | 103                     | 100%       | 42                   | 100%       |
| (1) Graduation Certificates and Certificates of Attendance are combined for mainstream students.                         |                         |            |                      |            |                         |            |                      |            |                         |            |                      |            |
| (2) Graduation Certificates are given to students who pass the standard course of study but not the competency tests.    |                         |            |                      |            |                         |            |                      |            |                         |            |                      |            |
| (3) Mainstream amounts were determined by subtracting deaf school students from totals reported to US Dept of Education. |                         |            |                      |            |                         |            |                      |            |                         |            |                      |            |
| Sources: DPI "State Test Results" and "End of Year Reports" (Unaudited). Schools for the Deaf testing coordinators       |                         |            |                      |            |                         |            |                      |            |                         |            |                      |            |

## FINDINGS AND RECOMMENDATIONS

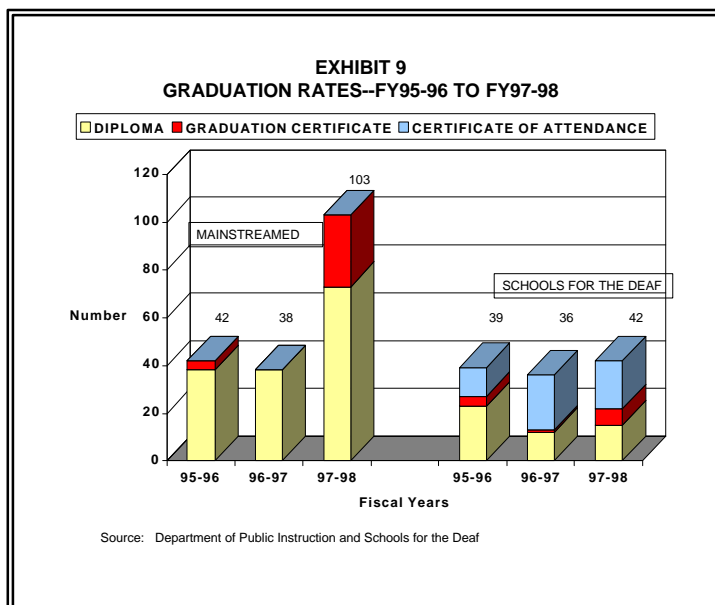
course of study requirements. The results are shown in Table 4. As can be seen, of those students eligible for graduation, mainstreamed students received diplomas 82% of the time for the three-year period, while students from the Schools for the Deaf received diplomas only 43% of the time. Graduation certificates were issued as follows: mainstreamed, 18% of time; Schools for the Deaf, 10%, with no certificates of attendance being issued by public schools. But the Schools for the Deaf issued certificates of attendance 47% of the time for seniors. Exhibit 9 shows the number of students graduating by type.

### RECOMMENDATION

**The Department and the Division of Early Intervention and Education should closely examine the graduation data for the Schools for the Deaf. With assistance from the Department of Public Instruction, other methods to increase the number of students receiving diplomas upon completion of the twelfth grade should be examined.**

**NCSD DOCUMENTATION OF THE ADMISSION PROCESS IS INCOMPLETE.**

- Two (7%) files did not include documentation of audiogram tests.
- One (3%) file did not include documentation of educational testing.
- Two (7%) files did not include documentation of Speech/Language Evaluation.
- Three (10%) files did not include documentation of Invitation of Conference/Prior Notice.
- Ten (33%) files did not include documentation of an Exceptional Children Referral.
- Two (7%) files did not include documentation of Prior Notice and Parent Consent for Evaluation.
- Two (7%) files did not include a Summary of Evaluation Results and Eligibility Determination.
- Four (13%) files did not include Part I—Individualized Education Program.
- Ten (33%) files did not include Part I—Attachment Consideration of Special Factors.
- Four (13%) files did not include Part II—Individualized Education Program.
- Four (13%) files did not include Part III—Individualized Education Program.
- Three (10%) files did not include Prior Notice of Recommendation/Approval for Placement forms.
- Eleven (37%) files did not include Prior Notice and Consent for Initial Placement forms.



We reviewed the admission policy for all three Schools for the Deaf to obtain an understanding of the requirements for student admission to the schools. We analyzed student evaluation and admission forms to determine whether all students admitted were eligible to attend the school. We selected a random sample of 30 student files at each school from student rosters, including all grades from preschool to twelfth grade.

We noted no problems for ENCSD and CNCSD; however, at NCSD, our analysis noted the concerns detailed in the box to the left. Non-compliance with the established admission policy could result in students being admitted to the school

## **FINDINGS AND RECOMMENDATIONS**

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who do not meet the required eligibility standards. The above problems may have resulted from staff turnover at the senior management level and within the Student Support Services section. Also, the decentralization of student records prevented accuracy and consistency within the record-keeping process.

### **RECOMMENDATION**

**NCSD should implement procedures to ensure compliance with its admission policies and procedures. All required documentation necessary to support a student's eligibility for admission to the school should be maintained in each student's file at a centralized location. Additionally, the Division of Early Intervention and Education should conduct periodic review of files for compliance.**

### **THE SCHOOLS ARE NOT IN COMPLIANCE WITH THE REQUIREMENTS OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT (PUBLIC LAW 94-142).**

Public Law 94-142 outlines the requirements for creating and maintaining Individualized Education Programs (IEP) for each student enrolled at the Schools for the Deaf. The Department of Public Instruction defines an IEP as “. . . a written plan for the special education and/or related services that will be provided to a particular child.” Educational programs are tailored to meet the specific needs of each exceptional child. An IEP contains a statement of the child's present levels of educational performance, a statement of annual goals, short-term instructional goals, specific educational and related services to be provided to the child, projected dates of initiation of services, and duration of services.

The IEP is developed in a team meeting in which all members of the IEP team decide what is an appropriate education plan for the child who needs services. Further, the law requires the IEP committee meet within one year from the prior meeting to review the student's IEP to determine if goals and objectives of the program were accomplished and to develop a new IEP for the subsequent year. Documenting a student's progressive performance is critical to evaluating the quality of the program as well as achieving the program's objective of comprehensive development for the student. We reviewed current and prior year IEPs for a sample of students. We selected a random sample of 30 student files at each school.

At NCSD, our analysis revealed that four (13%) student files in the sample did not contain all required documentation. Our analysis of files at all three schools indicated that IEPs were not being completed within the required one year time frame. At NCSD, seven (23%) of the 30 IEPs were not updated within one year of the previous meeting and another six (20%) did not show the date of the most recent IEP completion. At ENCSD, five (17%) of the 30 IEP meetings were not held within 12 months of the prior meeting. At CNCSD, ten (33%) of 30 students did not have updated IEPs within a year of the previous IEP. The deadlines were missed due to scheduling conflicts between the schools and parents and because the schools waited too long to begin the re-evaluation process. Lastly, during the months of February and

## **FINDINGS AND RECOMMENDATIONS**

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March 1999, the occupational therapist at ENCSD was on extended sick leave. During this period of time, the school did not contract or provide services for occupational therapy for those students as required in their IEP.

Non-compliance with Public Law 94-142 creates the potential that students may not meet the developmental objectives outlined in each year's IEP. Additionally, not providing services as required in a student's IEP puts the school at risk for losing federal funds.

### **RECOMMENDATION**

**The schools should implement procedures to ensure compliance with Public Law 94-142. All required documentation necessary to monitor a student's IEP progress should be maintained in each student's file at a centralized location. Management should begin the process of scheduling and conducting IEP meetings far enough in advance to ensure that all students have their IEP updated at least annually. Further, the Student Support Services Director at ENCSD should monitor the absences of his/her employees. When an employee will be absent for an extended period of time, the school should contract for the services required in a student's IEP to prevent a lapse of services.**

### **NCSD AND ENCSD ARE NOT COMPLYING WITH STATE REGULATIONS REGARDING TRANSCRIPTS FOR HIGH SCHOOL STUDENTS.**

We selected a random sample of 30 students each at NCSD and ENCSD who completed high school during the past five school years to review transcripts. (ENCSD only has students through grade 8.) NCSD was unable to provide transcripts for two students (6.7%) and ENCSD did not maintain transcripts for four (13%) students. GS §115C-12(18) and directives from the North Carolina State Board of Education require that schools issue the North Carolina Standard Transcript to students in grades nine through twelve yearly. In addition, transcripts issued by NCSD do not conform to the format of the North Carolina Standard Transcript. The North Carolina Standard Transcript can be printed directly from the Student Information Management System (SIMS). However, prior to the 1999 school year, NCSD did not have an operational SIMS. In addition to the non-compliance with state law, the lack of transcripts could hinder a student's enrollment in colleges or limit a student's job opportunities.

### **RECOMMENDATION**

**The schools should review all high school student files to ensure that transcripts are on file for all students. NCSD should continue its emphasis on implementing SIMS and use the format for the North Carolina Standard Transcript contained within the SIMS database to comply with State rules and regulations. The Division of Early Intervention and Education should conduct periodic reviews to assure compliance.**

## FINDINGS AND RECOMMENDATIONS

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### HEALTH AND SAFETY

**Objective:** *To ascertain whether the work/school environment meets applicable health and safety standards for the staff and students, including an architect's review of physical plant needs.*

We reviewed policies and procedures governing the health and safety of staff and students. In addition, we examined reports and case files regarding employee accidents, fire code and building inspections, student abuse incidents, workers' compensation claims, and safety committee meetings. Observations of the conditions of buildings were made during tours of the three campuses. Finally, we engaged an architectural firm to analyze the building conditions and recommend necessary structural improvements at the Schools for the Deaf. (See Appendix B, page 89 for complete report from architects.)

**Conclusion:** Based on the report submitted by the architects, the Schools for the Deaf are in need of considerable structural improvements. Estimated costs for repairs are: CNCSD-Greensboro, \$6,717,584; ENCSD-Wilson, \$18,545,280; and NCSD-Morganton, \$27,178,366. We did find that operational procedures are in place to report and investigate accidents and student abuse claims. However, the reporting methods were not uniform. The Division and Schools, with minor exceptions, document accidents, inspections, safety committee meetings, and workers' compensation claims. In general, these methods are adequate to ensure the health and safety of the staff and students and meet the appropriate health and safety standards. Specific findings and recommendations regarding health and safety issues are discussed below.

### ARCHITECTS ESTIMATE IT WOULD TAKE \$52 MILLION TO ADEQUATELY ADDRESS NEEDED REPAIRS AND MAINTENANCE AT THE SCHOOLS FOR THE DEAF.

During the initial stages of the audit, the audit team observed the varying conditions of the buildings on the three school campuses. We realized the need for assistance from experts in determining the building maintenance needs and associated costs. Therefore, the Office of the State Auditor engaged a private architectural firm (Hoskins, Scott, and Partners, Inc.<sup>5</sup>) to analyze the conditions of the building structures, recommend necessary changes, and estimate the costs to complete those changes. Hoskins, Scott reviewed facility capital improvement plans, held discussions with school management, observed the condition of each building on the three campuses, and estimated renovation costs using industry standards. See Appendix

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<sup>5</sup> Hoskins, Scott and Partners, Inc., located in Boston, MA., is an architectural firm specializing in health care facilities.

## FINDINGS AND RECOMMENDATIONS

B, page 89 for their full report. Based on their work, Hoskins, Scott have estimated that it would cost approximately \$52,441,230 to achieve the necessary repairs and maintenance at the Schools for the Deaf.

Table 5 contains a summary of the findings. Some of the deterioration of the buildings is the natural result of wear and tear over time. However, the more extreme cases of renovation needs result from a combination of a lack of attention to needs, a lack of prioritization in the annual budgeting process, or a lack of funding made available by the Department or General Assembly. Failure to attend to these conditions could result in serious health and safety risks to students and staff.

### RECOMMENDATION

The Department should carefully review the findings and recommendations contained in the report from Hoskins, Scott and Partners, Inc. and prioritize them. The General Assembly should be made aware of the physical plant needs on the campuses and identify funds to address these needs as soon as possible. Furthermore, each school director should, after consultation with the Department, prioritize building renovation requirements and ensure that available funds are directed toward the most pressing needs. The Department and the schools should develop a long-range plan for

**renovation of existing buildings and utilization of campus facilities.**

### THE SCHOOLS FOR THE DEAF DO NOT HAVE A UNIFORM REPORTING METHOD FOR INCIDENTS OR ACCIDENTS.

As part of the audit, we examined the procedures in place at each of the schools for reporting incidents or accidents. These procedures have a direct bearing on the safety of the students and staff. We found that all three schools have policies and procedures that deal directly with

| TABLE 5<br>SUMMARY OF ARCHITECT'S RECOMMENDATIONS FOR<br>NEEDED REPAIRS AND RENOVATIONS   |                     |
|---|---------------------|
| CAMPUS  | EST. COSTS          |
| <b>CNCSD – Greensboro--</b>   | <b>\$6,717,584</b>  |
| <ul style="list-style-type: none"> <li>Generally well-maintained buildings and campus</li> <li>Overall, needs minor to moderate repair; under-utilized buildings</li> <li>Repairs of windows (wood-frame energy inefficient) and roofs (worn) needed</li> <li>Need upgrade of alarm system, HVAC controls, and handicapped access</li> <li>Dorm areas could use more privacy</li> </ul>   |                     |
| <b>ENCSD – Wilson--</b>   | <b>\$18,545,280</b> |
| <ul style="list-style-type: none"> <li>Generally well-maintained buildings and campus</li> <li>Overall, needs moderate repair; under-utilized buildings</li> <li>Dorm areas need layout revision for privacy and staff supervision</li> <li>Handicapped access is poor throughout</li> <li>Windows throughout are inoperable and energy inefficient</li> <li>Roofs are leaking and in need of repair</li> <li>HVAC Systems need upgrade and replacement</li> <li>Presence of asbestos in floor tile and insulation</li> <li>Alarm systems need improving for deaf and hard of hearing population</li> </ul>   |                     |
| <b>NCSD – Morganton--</b>   | <b>\$27,178,366</b> |
| <ul style="list-style-type: none"> <li>Buildings in fair condition generally with wide variety of conditions depending on building</li> <li>Many need at least moderate repair</li> <li>HVAC systems need repair, replacement, or in some cases installation</li> <li>Repair or replacement of roofs, bathrooms, and alarm systems</li> <li>Handicapped access issues throughout</li> <li>Grossly oversized buildings and infrastructure for current student needs</li> <li>Need for campus-wide programmatic and physical master plan</li> <li>Vacant buildings need upgrading and minimally, "mothballing" for protection until renovation</li> </ul> |                     |
| <b>TOTAL ESTIMATED COSTS FOR REPAIRS AND MAINTENANCE</b>  | <b>\$52,441,230</b> |
| Source: Summarized by OSA from report by Hoskins, Scott and Partners, Inc. Architects   |                     |

## FINDINGS AND RECOMMENDATIONS

reporting incidents or other actions that affect students and staff. However, we noted that each school uses different forms, asks different questions, and has different methods of documenting referrals to the local Division of Social Services as required by statutes. Further, an examination of a sample of 722 incident reports from all three schools showed that the reporting forms are not pre-numbered which makes it impossible to determine if all forms were properly filed. We also noted delays in reporting and/or acting on incidents at ENCSD.

Table 6 summarizes the results of the audit tests. The reporting of incidents and accidents, especially of students, is one of the key methods available to the schools for ensuring the health and safety of their charges.

### RECOMMENDATION

**The Division of Early Intervention and Education should immediately review all procedures for reporting and referral of incidents. A uniform system to be used by all three schools should be developed and immediately implemented. Each school director should take steps to assure that all staff are aware of the policies and procedures for reporting all types of incidents and are trained in how and when to report incidents. To ensure that all incidents and accidents are reported and not lost, the Schools should begin using pre-numbered forms and account for each, including voided forms.**

**TABLE 6**  
**SUMMARY OF INCIDENT REPORTING**  
**SAMPLE AT ENCSD**

**Incident Reporting (sample size 522)**

- Three (0.57%) incidents were reported more than five days after the incidents occurred.
- Fourteen (2.68%) instances in which the school took more than five days to act on reported incidents.

**Protective Intervention Techniques database (sample size 37)**

- Eighteen (48.6%) instances in which the psychologist did not review the P.I.T. form timely.
- Seventeen (46%) instances where there was no indication the student was seen by the student health center (required by policy).
- Twelve (32.4%) instances where the form was not signed and dated by the person using the restraint technique.

**Time-out Room database (sample size 23)**

- Nine (39.1%) instances where the psychologist did not review the reports timely.
- Five (21.7%) instances in which the Time-out Room form was not signed and dated by the person using the room.
- One (4.3%) incorrect date was entered into the database.

**Student Support Services Referrals and Follow-ups**  
**(sample size 123)**

- Thirty-one (25.2%) referrals where the assessment was not completed timely

Source: Compiled by OSA

### **NEITHER THE DIVISION OF SERVICES FOR THE DEAF AND THE HARD OF HEARING NOR ENCSD HAS AN EFFECTIVE WORKPLACE SAFETY PROGRAM.**

GS §143-581 and 143-582 require each State agency to establish a written program for State employee workplace safety and health. GS §143-583 requires each State agency to create safety and health committees to perform workplace inspections, review injury and illness records, make advisory recommendations to the agency's managers, and perform other functions necessary for the effective implementation of the "State Employees Workplace Requirements Program for Safety and Health." To comply with the General Statutes, Department of Health and Human Services Directive 26 requires each division to establish and implement written policies and procedures for safety and health that meet the Department's and State's safety policies and guidelines.

## **FINDINGS AND RECOMMENDATIONS**

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We found that each of the three Schools for the Deaf had a safety committee and provided training to its employees. However, at the Division there was no documentation to support the existence of a safety committee or documentation that safety training had been provided to the Division employees. Discussions with Division personnel indicated that due to the limited number of personnel assigned to the Division, they did not consider the establishment of a safety program, to include a committee and employee training, to be a priority. The failure to establish an adequate safety program in compliance with State statutes jeopardizes the overall safety of Division employees. Additionally, review of minutes for the Health and Safety Committee at ENCSD revealed that the committee has not been meeting monthly in accordance with the prescribed policy. There were no minutes for meetings for the months of December 1997, January 1998, March through November 1998, January 1999, and February 1999. The Health and Safety Committee's failure to meet to discuss potential safety or health issues or past incidents increases the risk of possible injury or sickness for the student population and staff.

### **RECOMMENDATION**

**We support the Department in its efforts to address divisional workplace safety issues. The Division should take immediate steps to become compliant with General Statutes and Department regulations with respect to employee safety. Also, the ENCSD Director and safety officer/committee chairman should take stronger steps to ensure that the Health and Safety Committee meets in accordance with the prescribed policy.**

### **NEITHER THE DIVISION NOR THE SCHOOLS HAVE ADDRESSED FIRE SAFETY NEEDS IN A TIMELY MANNER.**

We examined compliance with fire safety needs at the Division of Services for the Deaf and the Hard of Hearing and at the Schools for the Deaf. The Division office, while in generally good physical condition, has no emergency evacuation plans posted in the building as required by Section 1910.38 of the Code of Federal Regulations (CFR). In addition, the offices are not equipped with flashing smoke detectors to provide adequate warning to the deaf and/or hard of hearing employees and visitors as provided for in CFR Section 1910.165 (2). In our opinion, the lack of adequate postings of emergency escape routes and flashing smoke detection devices could jeopardize the safety of Division employees.

GS §58-31-40 requires the North Carolina Department of Insurance (DOI) to inspect each State-owned building at least annually to identify any conditions that may be detrimental to the safety of the building or its occupants. We reviewed annual fire inspection reports for each of the schools from 1988 through 1998. We noted instances where the Schools failed to address building code violations and other fire safety deficiencies timely, with some deficiencies dating back to 1988 at NCSD. In many cases the Schools indicated they were either requesting Capital Improvement funds or would allocate school budgeted funds to correct the problems. However, the majority of the deficiencies remain uncorrected, and we

## FINDINGS AND RECOMMENDATIONS

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were unable to find any documentation that the requests for funds had been made to the Department. We also found that deficiencies requiring relatively minor maintenance attention were not corrected timely. Many of these issues are included in the architect's report on needed repairs and maintenance. (See Appendix B, page 89.)

Lastly, we examined records documenting fire drills held at the Schools as required by Department and individual schools' policies. We found that NCSD and CNCSD were conducting fire drills as required. However, between January 1998 and April 1999, ENCSD was out of compliance with its policy 50 times out of 112 (44.6%) for seven buildings. During the same period, it did not meet the Department's policy 12 times out of 35 (34.3%) for the seven buildings. Not conducting the fire drills in accordance with policy not only puts the students and staff at risk in case of a fire, but also increases the liability of the school if someone is hurt.

### RECOMMENDATION

**The Division should immediately provide conspicuous postings of building emergency escape routes and request the building owner/landlord to install flashing smoke detection devices to provide adequate warning for all employees. The Department should identify facility fire safety needs, prioritize them, and request funds from the General Assembly to address these needs. As funds become available, the Department should oversee the correction of noted deficiencies. Lastly, each school director should take steps to assure that all fire drills are conducted in accordance with policy.**

### **CNCSD HAS FAILED TO ANNUALLY UPDATE BUILDING CONTENT VALUES FOR INSURANCE PURPOSES.**

The North Carolina Department of Insurance (DOI) updates building structure values for North Carolina State-owned property annually when building inspections are conducted by DOI personnel. It is the responsibility of the individual State agency to update the content values for fire and lightning insurance protection each year. Review of CNCSD records and contact with DOI personnel disclosed that CNCSD has not updated its building content values within the past two years, despite requests from DOI. Additionally, we learned that no specific staff member has been responsible for updating these values in recent years. In our opinion, CNCSD should place priority on updating and protecting the equipment it has purchased with State funds. Failure to do so leaves the school and State vulnerable to losing replacement funding for expensive equipment in the event of a fire or damaging lightning strike.

## **FINDINGS AND RECOMMENDATIONS**

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### **RECOMMENDATION**

**CNCSD should immediately update the building content values and forward these to DOI and the new Superintendent for the Division of Early Intervention and Education. The Safety Officer, or another designated staff member, should be responsible for updating building content values annually and reporting them to DOI and the Division.**

## FINDINGS AND RECOMMENDATIONS

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### ORGANIZATIONAL AND STAFFING ISSUES

**Objective:** *To determine the current organizational structure and identify the functions and responsibilities of the Division of Services for the Deaf and the Hard of Hearing, the regional resource centers, the Schools for the Deaf, and the newly formed Division of Early Intervention and Education; and to evaluate staffing levels.*

To assess the current structure and to identify the functions and responsibilities of the Division of Services for the Deaf and the Hard of Hearing and its components, we first conducted in-depth interviews with Division employees involved in providing services to the deaf and the hard of hearing. We then obtained and analyzed organizational charts, reviewed job descriptions, analyzed position vacancies, and reviewed workload indicators. We next compared the organizational structure to those of similar type in other states. Lastly, we evaluated the organizational structure for the Division of Early Intervention and Education created during the audit.

**Conclusion:** The organizational structure at the schools is not consistent, with differences in the reporting relationships at each school. The function and responsibilities of the Division of Services for the Deaf and the Hard of Hearing were clearly delineated in statute, but changed significantly during the audit when the Division of Early Intervention and Education was formed. These changes necessitate modification to the organizational structure of the Division of Services for the Deaf and the Hard of Hearing. In addition, the regional resource centers are inconsistently staffed, leading to inconsistent provision of services across the State.

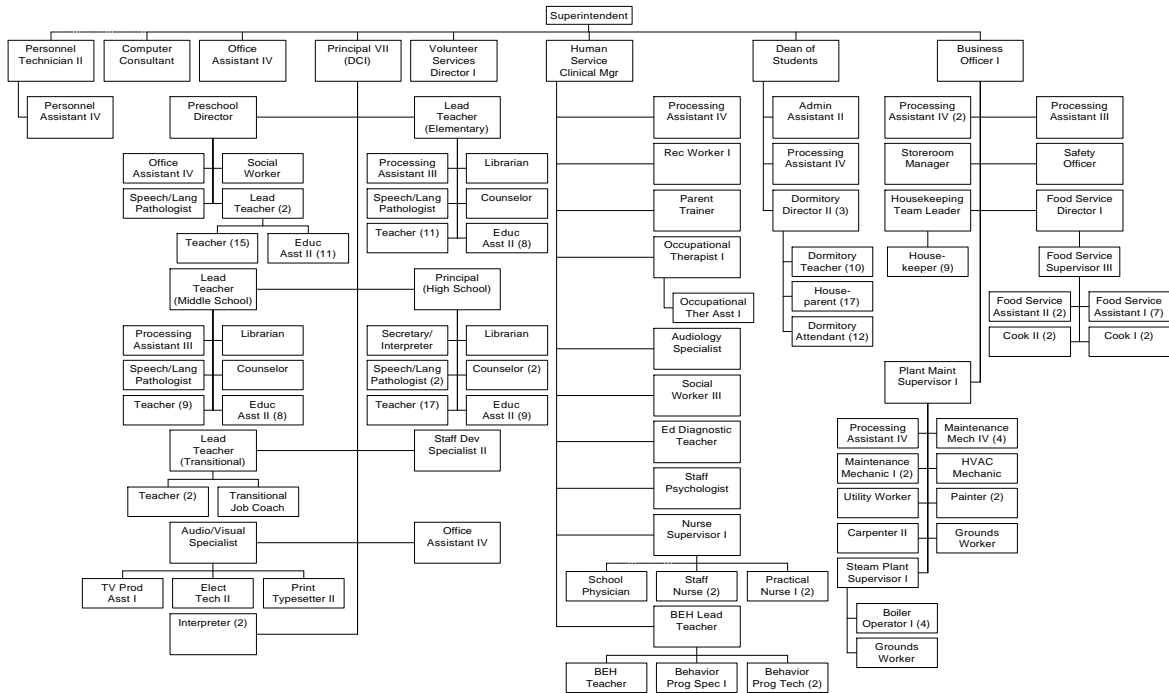
#### THE ORGANIZATIONAL STRUCTURE IS NOT CONSISTENT AT THE SCHOOLS.

During employee interviews, review of job descriptions, and analysis of the organizational chart and personnel data, we discovered that each school is structured differently despite their identical purpose and mission. Exhibits 10, 11, and 12 starting on page 27 detail the structures in place at the time of the audit. Examples of differences noted are:

- High school, middle school, elementary, and preschool--directed by Principal, Lead Teachers, Administrative Officer at NCSD, by Lead Teachers and Educational Administrator at CNCSD, and by Principals at ENCSO.
- Student Support Services section--led by Human Services Clinical Manager at NCSD, School Psychologist at CNCSD, and Principal II at ENCSO.
- Staff interpreters--located within the Curriculum and Instruction section at NCSD, Superintendent's Office at CNCSD, and Student Support Services section at ENCSO.
- Superintendent at NCSD reported to the Director of the Western Carolina Center (a mental health facility) from February 1998 through our on-site fieldwork in July 1999, other two schools reported to the Division Director.

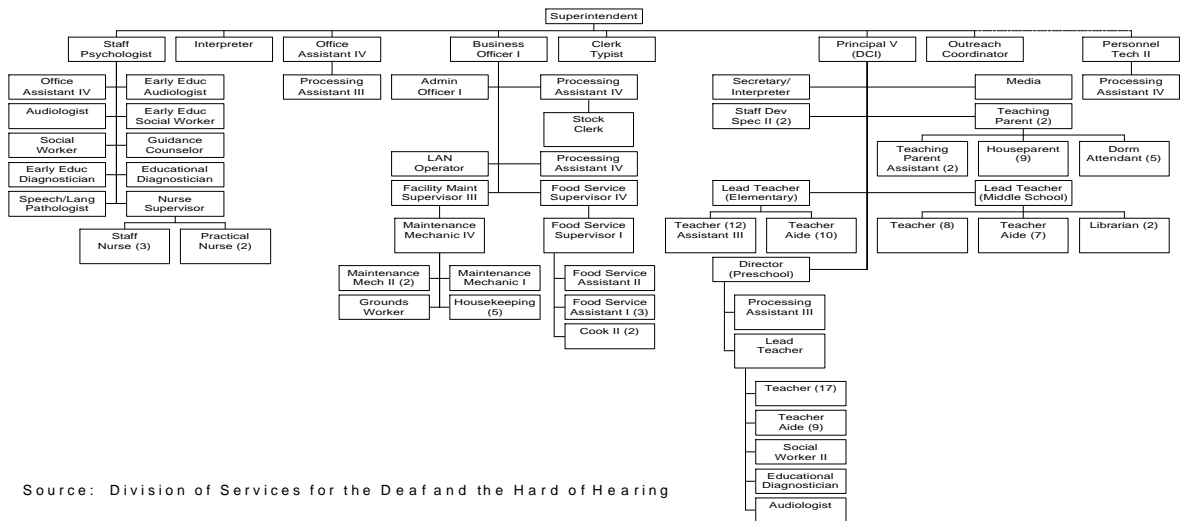
# FINDINGS AND RECOMMENDATIONS

**EXHIBIT 10  
ORGANIZATIONAL CHART AS OF MARCH 1999  
NCSD (MORGANTON)**



Source: Division of Services for the Deaf and the Hard of Hearing

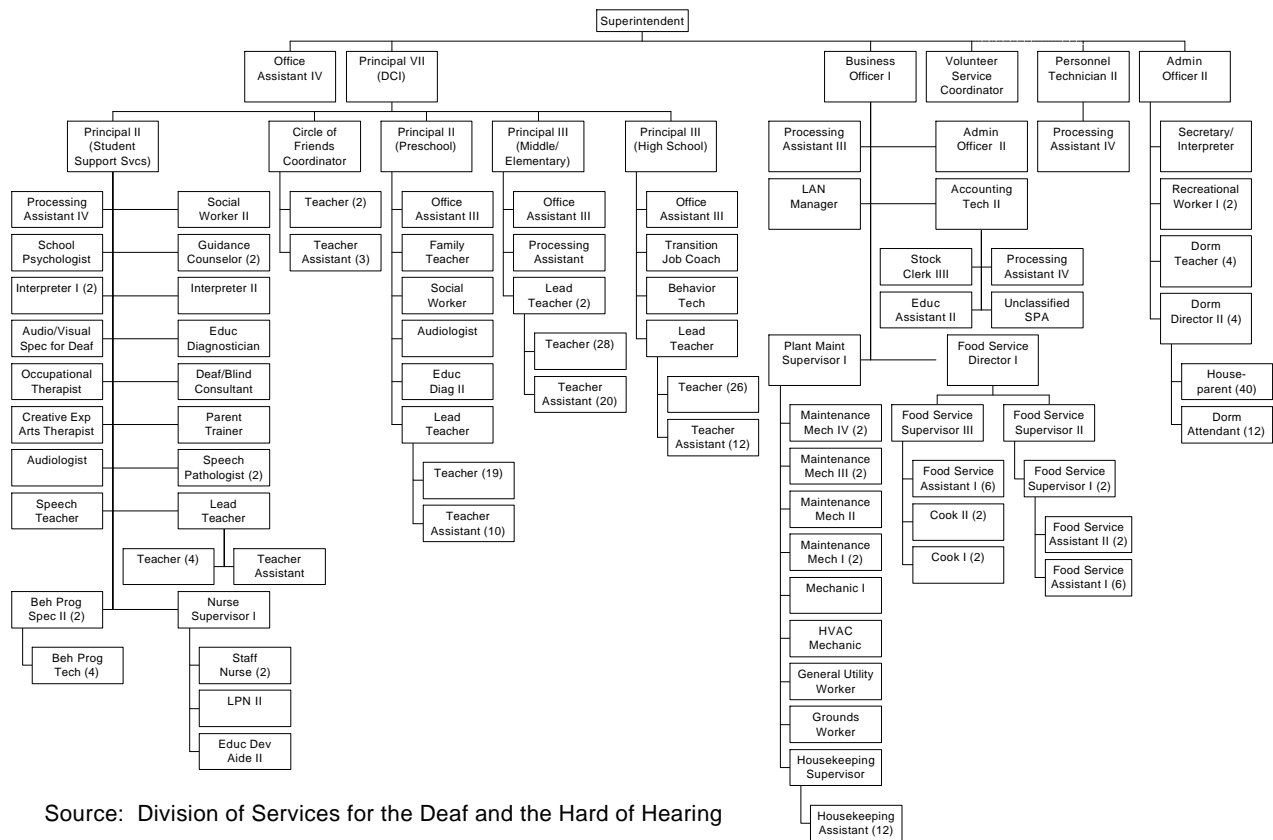
**EXHIBIT 11  
ORGANIZATIONAL CHART AS OF MARCH 1999  
NCSD (GREENSBORO)**



Source: Division of Services for the Deaf and the Hard of Hearing

# FINDINGS AND RECOMMENDATIONS

**EXHIBIT 12**  
**ORGANIZATIONAL CHART AS OF MARCH 1999**  
**ENCSD (WILSON)**



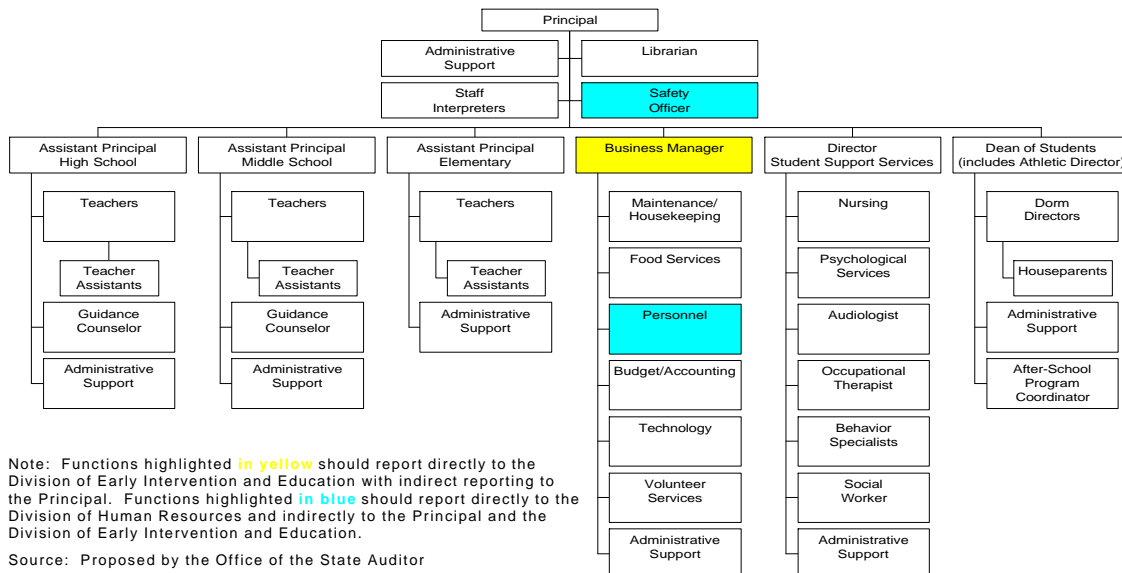
## FINDINGS AND RECOMMENDATIONS

Additionally, we found that job descriptions for 37% of the positions in our sample were not current and another 7% of the descriptions did not accurately reflect the actual job duties. While we realize staffing numbers will differ at each school depending on the number and mix of the student population, the organizations should be similar in structure. Restructuring to a consistent approach would provide greater comparison of school performance and improved communication between the Schools and the Division office.

### RECOMMENDATION

The organization of the Schools should be restructured so that the Schools are uniform and consistent in their approach to educating students. Exhibit 13 depicts our recommended organizational chart. Each section within each schools' organization should include the same functions and consistent classifications should be used for similar responsibilities at all three schools. Due to the concerns identified regarding safety, personnel, and business management, we believe these functions should report indirectly to each school's principal and directly to either the Division of Early Intervention and Education or the Department's Division of Human Resources, as shown in Exhibit 13 below, to allow improved oversight. The Division of Early Intervention and Education should work in conjunction with the Department's Division of Human Resources to review and update job descriptions and position classifications as needed.

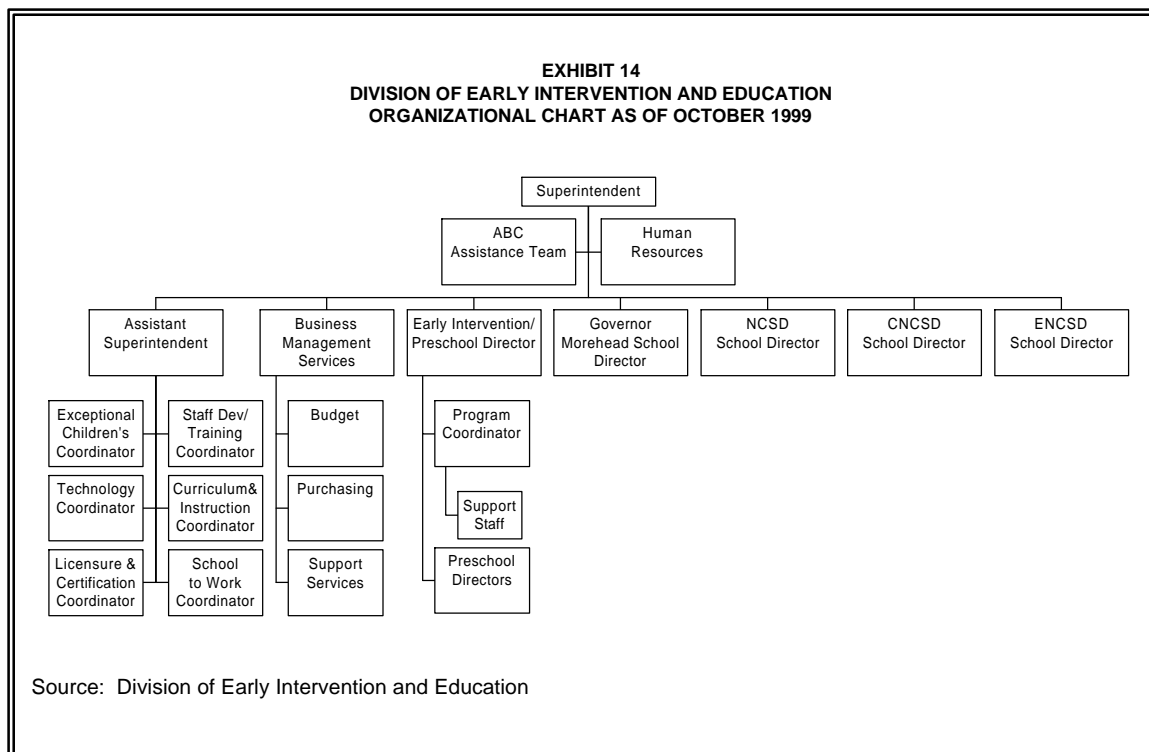
**EXHIBIT 13  
RECOMMENDED ORGANIZATIONAL CHART  
SCHOOLS FOR THE DEAF**



## FINDINGS AND RECOMMENDATIONS

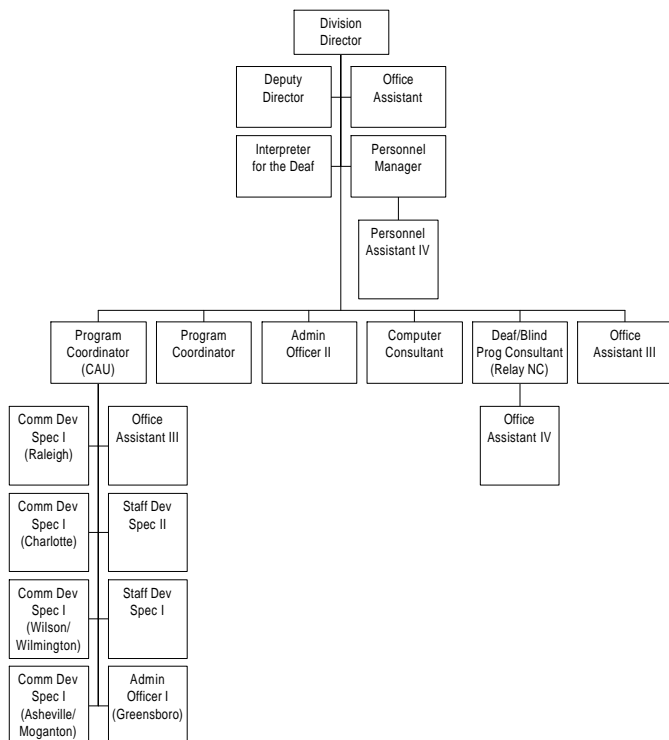
### THE CREATION OF THE DIVISION OF EARLY INTERVENTION AND EDUCATION AND THE LACK OF APPROPRIATE OVERSIGHT INDICATE A NEED TO REORGANIZE THE DIVISION OF SERVICES FOR THE DEAF AND THE HARD OF HEARING.

At the start of the audit, the Division of Services for the Deaf and the Hard of Hearing was responsible for oversight of three Schools for the Deaf (serving children), seven regional resource centers (serving adults), and the daily administration of deaf services within North Carolina. Historically, each school superintendent acted independently and directed his/her school with little guidance or supervision by the Division. The lack of Division oversight is evidenced by the errors found with regard to personnel, fixed assets, and budgeting. (See discussion starting on page 42.) In October, 1999, a new Division of Early Intervention and Education was created and the responsibility for the three Schools for the Deaf, along with The Governor Morehead School for the Blind, was transferred to this new division. (See Exhibit 14.) We concur with the transfer of the Schools for the Deaf to the Division of Early Intervention and Education. We believe consolidating the administration of all educational services to exceptional children will result in more consistent oversight.



## FINDINGS AND RECOMMENDATIONS

**EXHIBIT 15**  
**DIVISION OF SERVICES FOR THE DEAF AND THE HARD OF HEARING**  
**ORGANIZATIONAL CHART AS OF OCTOBER 1999**



Source: Division of Services for the Deaf and the Hard of Hearing

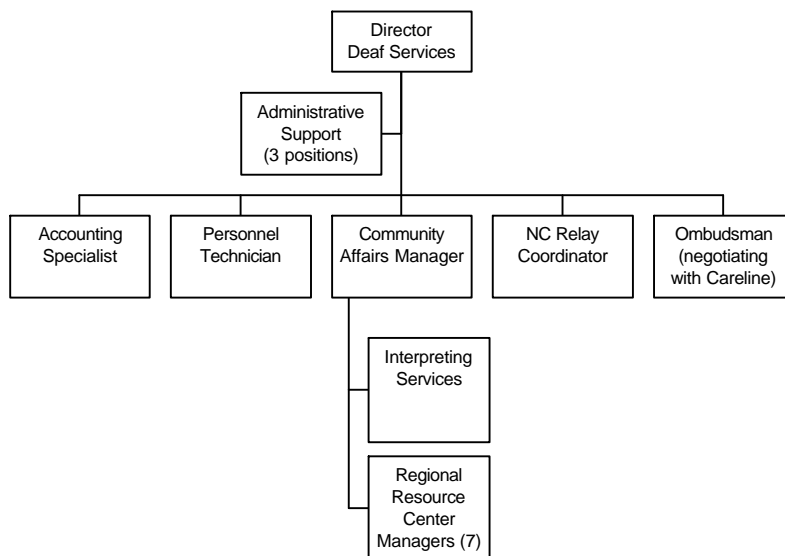
The organizational structure of the Division of Services to the Deaf and the Hard of Hearing after the restructuring is shown in Exhibit 15. Examination of the Division's organizational structure revealed unnecessary positions, several one-to-one reporting relationships, and an individual working out of position. While we have not found gross over-staffing in any area of the Division, we are recommending the realignment of several functions in light of the restructuring of the educational function. Exhibit 16 contains our proposed organizational structures based on the best information available at the time of the audit. We have excluded from our recommendation the identification of employees to fill positions in the new organiza-

tional structure. Management should properly perform this function.

### RECOMMENDATION

The Division of Services for the Deaf and the Hard of Hearing should consider reorganizing as shown in Exhibit 16. In our opinion, the proposed organizational structure would better enable the Division to provide services to the adult deaf and hard of hearing population. See "Issues for Further Study", page 63.

**EXHIBIT 16**  
**RECOMMENDED ORGANIZATIONAL CHART**  
**DEAF SERVICES**



Source: Proposed by Office of the State Auditor

## FINDINGS AND RECOMMENDATIONS

### THE REGIONAL RESOURCE CENTERS (RRCs) STAFFING PATTERNS MAY LEAD TO INCONSISTENT PROVISION OF SERVICES ACROSS THE STATE.

Currently, the seven RRCs are staffed with as few as one employee (Greensboro) and as many as seven (Charlotte). This occurred due to opening of new offices, transfers of positions to the Division office, position vacancies, and sharing of job functions between RRCs. For example, the Morganton and Asheville RRCs share the following positions: manager, interpreter services consultant, hard of hearing specialist, and community services specialist. The one employee in the Greensboro office is expected to fulfill all RRC job responsibilities.

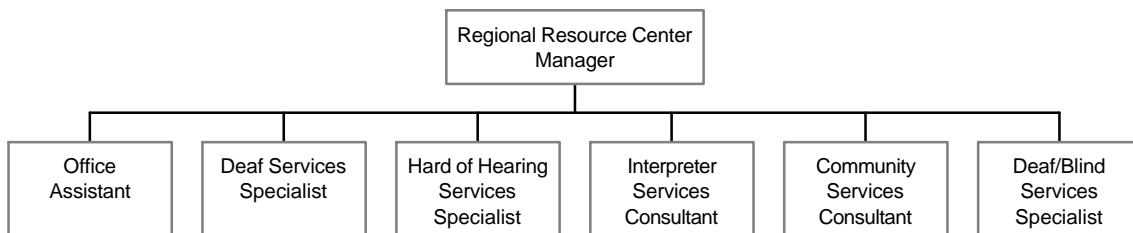
The lack of adequate staffing at each RRC may lead to certain services not being provided to consumers in some areas of the State. Based on RRC quarterly reports for FY1995-96 to FY1998-99, there are large disparities in the quantity of services being provided at each RRC.

Over half the services provided throughout the state are from the Asheville, Charlotte, and Wilson RRCs. Also, there are disparities in catchment area populations compared to the staffing level at the RRCs. Table 7 shows a comparison of the percentage of counties, population, services, and staff at each RRC. Greensboro is covering the same population as Charlotte, yet Greensboro has one employee and Charlotte employs seven individuals. Further, services provided vary for each RRC. This may be due to the different methodologies used at the RRC for reporting services (see discussion on page 39) or the

| TABLE 7<br>ANALYSIS OF RRC STAFFING LEVELS AND SERVICES PROVIDED<br>FY1998-99 |                 |            |                   |            |                    |                 |            |                       |
|---|-----------------|------------|-------------------|------------|--------------------|-----------------|------------|-----------------------|
| RRC LOCATION  | STAFFING LEVELS |            | SERVICES PROVIDED |            |                    | CATCHMENT AREA  |            |                       |
|   | NO.             | % OF TOTAL | TOTAL SERVICES    | % OF TOTAL | SERVICES PER STAFF | NUMBER COUNTIES | % OF TOTAL | % OF STATE POPULATION |
| Asheville   | 4               | 12%        | 12,049            | 19%        | 3,012              | 14              | 14%        | 7%                    |
| Charlotte   | 7               | 21%        | 13,458            | 21%        | 1,923              | 10              | 10%        | 18%                   |
| Greensboro  | 1               | 3%         | 1,544             | 2%         | 1,544              | 10              | 10%        | 18%                   |
| Morganton   | 5               | 15%        | 8,334             | 13%        | 1,667              | 13              | 13%        | 10%                   |
| Raleigh   | 6               | 18%        | 7,240             | 11%        | 1,207              | 18              | 18%        | 25%                   |
| Wilmington  | 4.5             | 13%        | 7,022             | 11%        | 1,560              | 11              | 11%        | 10%                   |
| Wilson  | 6.5             | 19%        | 14,639            | 23%        | 2,252              | 24              | 24%        | 12%                   |
| Total   | 34              | 100%       | 64,286            | 100%       | 1,891              | 100             | 100%       | 100%                  |

Source: Division, RRC Quarterly Reports

### EXHIBIT 17 RECOMMENDED ORGANIZATIONAL CHART REGIONAL RESOURCE CENTERS



Source: Proposed by Office of the State Auditor

## FINDINGS AND RECOMMENDATIONS

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staffing levels at the RRCs. In FY1998-99, services provided ranged from 1,544 in Greensboro to 14,639 in Wilson. Services provided per staff member varied from 1,207 in Raleigh to 3,012 in Asheville.

### RECOMMENDATION

**All Regional Resource Centers should be staffed fully to provide a uniform array of services to the consumers within each region. In our opinion, the Department should carefully consider the structure shown in Exhibit 17, page 32. If necessary, the Department should consider relocating some of the RRCs to better balance the services provided. Also, the Department should analyze whether a full-time manager is necessary for each site or whether two sites may be able to share one manager.**

### THE DIVISION AND SCHOOLS DID NOT MAXIMIZE THEIR PERSONNEL RESOURCES BY FILLING VACANCIES TIMELY.

To assess the effective use of personnel resources, we analyzed the length of time positions remained vacant. We obtained a position listing from the Office of State Personnel (OSP) showing all positions vacant as of March 6, 1999. At that time, there were 93 position vacancies with 50 (54%) being unfilled for at least six months (see Table 8, page 34 for position vacancies by type). We analyzed these vacancies to determine whether the positions had been posted or filled or the reasons for their remaining vacant during the fieldwork portion of the audit.

According to Division and school management, all positions were necessary to adequately perform assigned duties. Several factors account for the amount of time taken to fill a position. First, OSP regulations must be followed relative to the posting of a vacancy and the interview process. Secondly, since the Schools had not been given authority by the Department/Division to fill their own vacancies, all recommendations for new hires must be approved by the Department/Division. The Schools report that this process adds considerable time between the posting and new employee start date. Other positions were left unfilled due to a hiring freeze during the reorganization of the Division. Also, seasonal hiring trends lead to delays in filling teaching positions. Finally, the Schools' personnel staffs reported positions remained vacant as a result of difficulty hiring qualified individuals at current salary levels. Several of these vacant positions are integral to students who require services detailed in their Individualized Educational Programs (IEPs). Vacant positions create a burden due to the increased workloads required of the other employees.

## FINDINGS AND RECOMMENDATIONS

**TABLE 8  
POSITION VACANCIES BY TYPE**

| Position Class Title        | Budgeted Salary | Type           | # of Days Vacant as of 03/06/1999 | Section         |
|-----------------------------|-----------------|----------------|-----------------------------------|-----------------|
| Teacher                     | \$44,456        | Academic       | 932                               | CNCSD           |
| Teacher                     | \$44,456        | Academic       | 583                               | ENCSD           |
| Teacher                     | \$44,456        | Academic       | 370                               | CNCSD           |
| Teacher                     | \$44,456        | Academic       | 370                               | CNCSD           |
| Teacher                     | \$44,456        | Academic       | 347                               | NCSD            |
| Teacher                     | \$44,456        | Academic       | 288                               | ENCSD           |
| Teacher                     | \$44,456        | Academic       | 270                               | CNCSD           |
| Teacher                     | \$44,456        | Academic       | 270                               | CNCSD           |
| Teacher                     | \$44,456        | Academic       | 249                               | CNCSD           |
| Teacher                     | \$44,456        | Academic       | 249                               | ENCSD           |
| Teacher                     | \$44,456        | Academic       | 249                               | ENCSD           |
| Teacher                     | \$44,456        | Academic       | 249                               | NCSD            |
| Teacher                     | \$44,456        | Academic       | 249                               | NCSD            |
| Teacher                     | \$44,456        | Academic       | 232                               | CNCSD           |
| Teacher                     | \$44,456        | Academic       | 218                               | ENCSD           |
| Teacher                     | \$44,456        | Academic       | 217                               | CNCSD           |
| Teacher                     | \$44,456        | Academic       | 212                               | NCSD            |
| Teacher                     | \$44,456        | Academic       | 157                               | NCSD            |
| Teacher                     | \$44,456        | Academic       | 121                               | NCSD            |
| Teacher                     | \$44,456        | Academic       | 80                                | NCSD            |
| Teacher                     | \$44,456        | Academic       | 33                                | NCSD            |
| Teacher                     | \$44,456        | Academic       | 5                                 | ENCSD           |
| Teacher                     | \$44,456        | Academic       | 1                                 | ENCSD           |
| Principal                   | \$50,407        | Academic       | 33                                | NCSD            |
| Parent Trainer              | \$23,382        | Academic       | 442                               | ENCSD           |
| Parent Trainer              | \$23,382        | Academic       | 269                               | NCSD            |
| Librarian                   | \$26,642        | Academic       | 106                               | NCSD            |
| Lead Teacher                | \$34,741        | Academic       | 64                                | CNCSD           |
| Guidance Counselor          | \$28,318        | Academic       | 635                               | ENCSD           |
| Educ/Develop Aide II        | \$16,896        | Academic       | 632                               | ENCSD           |
| Educ/Develop Aide II        | \$16,896        | Academic       | 269                               | ENCSD           |
| Educ/Develop Aide II        | \$16,896        | Academic       | 134                               | CNCSD           |
| Educ/Develop Aide II        | \$16,896        | Academic       | 115                               | ENCSD           |
| Educ/Develop Aide II        | \$16,896        | Academic       | 65                                | NCSD            |
| Educ/Develop Aide II        | \$16,896        | Academic       | 64                                | ENCSD           |
| Educ/Develop Aide II        | \$16,896        | Academic       | 61                                | CNCSD           |
| Educ/Develop Aide II        | \$16,896        | Academic       | 61                                | ENCSD           |
| Educ/Develop Aide II        | \$16,896        | Academic       | 15                                | CNCSD           |
| Educ Media Spec I           | \$26,508        | Academic       | 113                               | NCSD            |
| Educ Diagnostician II       | \$28,895        | Academic       | 249                               | CNCSD           |
| Volunteer Services Dir I    | \$24,370        | Administrative | 40                                | NCSD            |
| Stock Clerk II              | \$16,263        | Administrative | 33                                | CNCSD           |
| Staff Development Coord     | \$32,771        | Administrative | 253                               | Division Office |
| Staff Development Splist II | \$27,641        | Administrative | 978                               | CNCSD           |
| Staff Development Splist II | \$27,641        | Administrative | 64                                | Division Office |
| Processing Assistant IV     | \$18,408        | Administrative | 218                               | NCSD            |
| Processing Assistant III    | \$17,297        | Administrative | 8                                 | ENCSD           |

**TABLE 8 (CONTINUED)  
POSITION VACANCIES BY TYPE**

| Position Class Title       | Budgeted Salary | Type           | # of Days Vacant as of 03/06/1999 | Section         |
|----------------------------|-----------------|----------------|-----------------------------------|-----------------|
| Office Assistant III       | \$17,297        | Administrative | 8                                 | Division Office |
| Human Svcs Coord III       | \$26,508        | Administrative | 124                               | Division Office |
| Human Svcs Coord III       | \$26,508        | Administrative | 68                                | Division Office |
| Administrative Officer II  | \$28,895        | Administrative | 461                               | NCSD            |
| Administrative Asst II     | \$23,382        | Administrative | 36                                | NCSD            |
| Food Service Assistant I   | \$15,822        | Dining         | 867                               | NCSD            |
| Food Service Assistant I   | \$15,822        | Dining         | 794                               | NCSD            |
| Food Service Assistant I   | \$15,822        | Dining         | 794                               | NCSD            |
| Food Service Assistant I   | \$15,822        | Dining         | 38                                | ENCSD           |
| Cook I                     | \$15,902        | Dining         | 50                                | NCSD            |
| Houseparent                | \$16,896        | Dormitory      | 490                               | CNCSD           |
| Houseparent                | \$16,896        | Dormitory      | 276                               | ENCSD           |
| Houseparent                | \$16,896        | Dormitory      | 217                               | NCSD            |
| Houseparent                | \$16,896        | Dormitory      | 139                               | NCSD            |
| Houseparent                | \$16,896        | Dormitory      | 39                                | ENCSD           |
| Houseparent                | \$16,896        | Dormitory      | 5                                 | ENCSD           |
| Dormitory Teacher          | \$17,297        | Dormitory      | 121                               | NCSD            |
| Dormitory Director II      | \$22,470        | Dormitory      | 894                               | ENCSD           |
| Dormitory Director II      | \$22,470        | Dormitory      | 61                                | ENCSD           |
| Dormitory Attendant        | \$16,263        | Dormitory      | 33                                | ENCSD           |
| Dormitory Attendant        | \$16,263        | Dormitory      | 8                                 | NCSD            |
| Maintenance Mechanic V     | \$24,370        | Maintenance    | 157                               | NCSD            |
| Maintenance Mechanic I     | \$17,698        | Maintenance    | 232                               | NCSD            |
| Maintenance Mechanic I     | \$17,698        | Maintenance    | 232                               | NCSD            |
| HVAC Mechanic              | \$23,382        | Maintenance    | 33                                | ENCSD           |
| Grounds Worker             | \$16,896        | Maintenance    | 106                               | NCSD            |
| Spch and Lnge Pathlog I    | \$30,133        | Service        | 978                               | CNCSD           |
| Social Worker III          | \$26,508        | Service        | 116                               | ENCSD           |
| Social Worker I            | \$21,600        | Service        | 794                               | NCSD            |
| School Psychologist        | \$26,041        | Service        | 249                               | NCSD            |
| Rehabilitation Therapist   | \$21,600        | Service        | 794                               | NCSD            |
| Practical Nurse I          | \$17,698        | Service        | 794                               | NCSD            |
| Interpreter for the Deaf I | \$19,148        | Service        | 194                               | Division Office |
| Inter Svcs Consul          | \$22,470        | Service        | 117                               | Division Office |
| Community Devel Splist I   | \$28,895        | Service        | 461                               | Division Office |
| Behavioral Prog Tech       | \$19,148        | Service        | 186                               | NCSD            |
| Behavioral Prog Tech       | \$19,148        | Service        | 525                               | ENCSD           |
| Behavioral Prog Tech       | \$19,148        | Service        | 186                               | ENCSD           |
| Behavioral Prog Tech       | \$19,148        | Service        | 186                               | ENCSD           |
| Behavioral Prog Tech       | \$19,148        | Service        | 186                               | ENCSD           |
| Audiologist                | \$30,133        | Service        | 370                               | NCSD            |
| Audiologist                | \$30,133        | Service        | 61                                | ENCSD           |
| Audiologist                | \$30,133        | Service        | 33                                | ENCSD           |

Source: Vacancy Listing, Office of State Personnel

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### **RECOMMENDATION**

**With assistance from the Department's Division of Human Resources, the Division of Early Intervention and Education and the Division of Services for the Deaf and the Hard of Hearing should evaluate the necessity of all vacant positions. Department management should evaluate the procedures used to fill vacancies, identify points of delay, and modify procedures to fill needed positions in a timely manner. In addition, consideration should be given to permanently contracting any specialized service positions that remain vacant for longer than ninety days.**

## FINDINGS AND RECOMMENDATIONS

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### OPERATIONAL AND COMPLIANCE ISSUES

**Objective:** *To review operations for adequacy of controls, adequacy of reporting and accountability systems, and compliance with applicable laws and regulations.*

We reviewed the policies and procedures of the Department, Division, and the schools. Information regarding the long-range planning process and budgeting process was reviewed to determine the agency's and schools' future goals and objectives. Where applicable, we reviewed management reports and committee minutes. Throughout the audit, we observed operations and the means of communicating changes to staff. Additionally, we reviewed the General Statutes and the North Carolina Administrative Code, as well as state regulations provided in the State Budget Manual, State Personnel Manual, and the Office of the State Controller's Fixed Asset Policies and Procedures. Tests of a sample of fixed assets, personnel files, and contracts were performed to determine compliance with the applicable laws and regulations.

**Conclusion:** Operationally, the Division and the Schools did not have an effective planning process or have detailed, written policies and procedures. In general, the Division and Schools complied with applicable laws and regulations. However, we noted several instances of non-compliance in fixed assets and personnel file documentation. Several areas were identified where controls could be strengthened and performance more actively monitored. However, we did note that the Division and Schools are progressing in improving management controls, planning, and communication. Below, we outline specific areas of concern.

#### Operations:

#### **THE DIVISION AND SCHOOLS' PLANNING PROCESS DOES NOT CAPTURE THE NECESSARY LEVEL OF DETAIL.**

One of the most critical needs for any organization is the establishment of a clearly defined strategic or long-range plan that articulates the focus of the organization, identifies goals and objectives, and establishes appropriate planning procedures. The strategic plan should address all aspects of the operation of the agency. As part of the audit, we reviewed the Division's planning process. State Planning and Budgetary Regulations (GS §143A-17 and 143B-10) require each agency to submit both short-term and long-term plans as part of its budgetary request. The Department had a seven-year "strategic planning model" which was not dated. The plan addressed, in broad terms, the goals and objectives of the Department. In 1997, the Department began a strategic planning effort that intended to establish the Division

## FINDINGS AND RECOMMENDATIONS

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as an effective child/family/client centered service delivery agency. “Initiatives and Issues” (Initiatives) were established and presented to Department management in November 1997.

Review of the initiatives and issues showed that the plan did not identify specific steps to carry out the strategies, did not establish a timeline for completion of the goals, never identified who was assigned each task, and/or how to measure the outcome or output. Also, the initiatives did not address all operational areas; the concentration was on education. Our review of strategic and long-range plans at the three schools also indicated a need for a more extensive, thorough plan. Operational areas not addressed included preventive maintenance for buildings and equipment, replacement of buildings and equipment, financial operations, personnel operations, and technology operations. We were unable to locate any short-term plan other than the biennial budget requests, which did not contain the level of detail necessary to constitute a short-term plan. A number of the shortcomings in operation we have identified can be attributed to the lack of or poor planning. Therefore, it is our opinion that the planning process that existed at the time of the audit only marginally meets the requirements of the budgetary regulations.

### RECOMMENDATION

**The Department should continue its efforts to establish and implement procedures for a comprehensive short-term and long-term planning process. The long-term plan should address areas in detail. Each section chief should submit detailed goals and objectives to management for inclusion in the Division’s and Department’s overall plan. The short-term plan should be prepared each year detailing how funds appropriated by the Legislature will be spent in the major operational areas contained in the long-term plan. Detailed measures of performance should be identified, gathered, and evaluated for each objective.**

### **THERE IS A LACK OF COMMUNICATION BETWEEN AND AMONG THE DIVISION, SCHOOLS FOR THE DEAF, AND REGIONAL RESOURCE CENTERS.**

During the period of the fieldwork, there were 749 employees located across the State in the Division Office, three Schools for the Deaf, and seven Regional Resource Centers. As the audit progressed, we noted communication problems among and between all areas. There was little or no interaction among the three schools, seven RRCs or between the schools and the RRCs. Historically, each school superintendent and RRC manager has been allowed to operate independently of each other, the RRCs, and the Division. In our opinion, this situation results from the lack of an overall plan for the Division, schools, and RRCs, changes in leadership, and the “political power” (perceived or real) of the school superintendents and RRC managers.

The major concern identified by staff was the lack of consistency in managerial decisions and the implementation of policies, mainly in the area of personnel decisions. Additionally, staff was concerned about the inadequate responses and/or lack of support from the Division

## **FINDINGS AND RECOMMENDATIONS**

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Office. For instance, the Division has not developed and communicated a standard to the RRCs for counting services and clients/agencies/organizations (see finding on page 39). Therefore, the RRCs quarterly reports are inconsistent due to the different methods used by each RRC when counting services or individuals/agencies served. Also, interviews revealed frustration and confusion over initiatives, decisions, and a general lack of understanding about directions, goals, and objectives for the Division, Schools, and RRCs.

### **RECOMMENDATION**

**Lines of authority and responsibility should be clearly identified and communicated to all staff. Organizational reporting lines should be properly adhered to. Each section, school, and RRC should have input into the long-range plan and should be aware of how their actions relate to and impact on all other sections/schools/RRCs. Staff meetings should be scheduled as needed to update the staff on new initiatives, changes to policies and procedures, etc.**

### **THE LACK OF CLEARLY WRITTEN, SPECIFIC POLICIES AND PROCEDURES HAMPERS EFFECTIVE OPERATIONS FOR THE DIVISION AND THE SCHOOLS.**

The Division has a “directives manual” that was presented to us as the internal policies and procedures manual. Review of this manual reveals that it contains only minimal policies and procedures relative to daily office operations. In our opinion, this document does not contain the level of detail necessary to function as a true internal policies and procedures manual. Additionally, the policies were dated 1992 and 1993. We found no evidence of a procedure for updating the information contained in the manual nor procedures for distribution of the manual. Further review revealed that each section within the Division does not have specific, step-by-step procedures in place.

Each school maintains its own policies and procedures manual. We found that these policies are not uniform and consistent across the three schools. Furthermore, we noted that those policies were often outdated. Many of the policies simply restate those from the State Personnel Manual or Department or Division directives. However, many of the policies provided had been superseded by newer Department or Division directives.

The lack of formal written procedures has resulted in inconsistent practices in the past in such critical areas as personnel, finance, and incident investigations. The lack of specific procedures, as well as the inconsistency of procedures among the three schools, has contributed to staff confusion, frustration, and less than optimal performance.

### **RECOMMENDATION**

**Division management should make the development of a comprehensive internal policies and procedures manual, as well as specific policies and procedures manuals for each section within the Division, a priority.**

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Specific, step-by-step procedures should be included in each section's manual. A system for distributing and updating these procedural manuals should also be implemented. Once the procedures are in place, management should enforce strict adherence to the procedures in all areas. The Schools should follow the same policies where applicable and should also institute procedures for annual review and revision of the manuals. The new Division of Early Intervention and Education should work to ensure consistency in policies and procedures used at each school.

### THE DIVISION PROVIDES LIMITED GUIDANCE AND SUPERVISION TO THE REGIONAL RESOURCE CENTERS.

Currently, there are seven Regional Resource Centers (RRC) throughout the state providing services to the adult deaf and the hard of hearing population. The Division oversees the RRCs and provides limited administrative services to the Centers. The RRCs are required to provide quarterly reports to the Division with statistical data on types of services provided and number of individuals and agencies/organizations services. As part of the audit, we requested from the Division the quarterly reports for the period under review. The Division was unable to provide all reports and some of the reports had to be obtained directly from the RRCs. A review of these reports revealed errors and inconsistencies as shown in Table 9.

| TABLE 9<br>RRC QUARTERLY REPORT ERRORS<br>JULY 1, 1995 THROUGH JUNE 30, 1999 |                  |
|--|------------------|
| Type of Error  | Number of Errors |
| Mathematical   | 30               |
| Disagreements Within Report  | 18               |
| Improper Reporting   | 6                |
| Incomplete Reports   | 5                |
| <b>Total</b>   | <b>59</b>        |
| Source: DSDHH – RRC Quarterly Reports  |                  |

We also found inconsistencies due to the different methods used by each RRC when counting services or individuals/agencies served. Discussions with RRC managers revealed some RRCs may double count training services by counting both services to an agency and services to individuals attending the training. This hampers efforts to conduct comparative analysis of statistical data between RRCs to determine proper levels of staffing and appropriate catchment areas for each RRC.

Another inconsistency involves RRCs providing services outside their catchment areas. There are no restrictions on providing services outside a catchment area; however, RRCs will refer clients/agencies to other RRCs when they feel it is appropriate. As much as 26% of some RRCs services are to clients and agencies outside the catchment areas, while other RRCs provide a much smaller amount of services outside their catchment area.

In our opinion, inconsistencies at the RRCs result from the lack of updated policy and procedure manuals, including directions on completion of quarterly reports and limitations on providing services outside a catchment area. We did find that RRC managers, on their own, have attempted to work together to develop definitions for services and how to count services to improve consistency, but this attempt was only partially effective. Formal policy and procedure manuals are important for consistency in a decentralized environment.

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### **RECOMMENDATION**

**The Division should take an active role in providing guidance and supervision to the Regional Resource Centers to ensure reliable, consistent reporting. This should include establishing policies and procedures for all aspects of RRC operation. Service categories should be defined and standards developed for counting services and clients/agencies/organizations. Guidelines should be established on when it is appropriate to provide services outside the catchment areas or refer a client/agency to another RRC.**

### **TRAINING NEEDS OF DIVISION AND SCHOOL PERSONNEL ARE NOT BEING MET.**

Currently, most training of Division personnel and school staff is arranged by an administrative officer at the Division or by the person responsible for licensure at each school. During the employee interview process and throughout the audit fieldwork, we noted the need for additional training. Many employees stated that training opportunities were scarce or non-existent and that the limited opportunities were often insufficient. Furthermore, the employees spoke of the lack of proper training to fulfill their normal job duties. Employees said initial employee orientations were not held which led to a lack of knowledge of policies and procedures as well as employee benefit programs. We found that lack of employee knowledge and training contributed to errors regarding budget planning, fixed asset record-keeping, time sheet preparation, and fire code compliance.

Also, we found that cross training within sections was rarely performed. This resulted in work delays during employee absences and turnover. It appears that inadequate training resulted from the lack of a formalized process. Furthermore, other priorities on the campuses prevented funding from being available for training.

### **RECOMMENDATION**

**Division and school management should establish a formal training program. First, management should critically assess the training needs of all staff and compare those needs to the available resources. A training plan should be developed for the Division and each school and specific courses should be made available to all staff based on needs identified through the Performance Management Program. Management should prioritize training needs in the biennial budget process and acquire funds for this endeavor. Finally, a tracking system should be developed to monitor progress toward achieving the training goals.**

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### **THE SCHOOLS DO NOT HAVE AN EFFECTIVE WORK ORDER SYSTEM IN PLACE.**

During the audit, we examined the process for recording maintenance activities against established work orders. The Schools had implemented work order systems whereby personnel requesting maintenance or repairs complete a work order request. According to the maintenance directors, the work order should be approved by the section head and given to the school's maintenance staff who performs the work. However, we were unable to locate any written procedures for completing and processing work order requests.

To test the effectiveness of the work order systems, we reviewed documentation supporting charges against current work orders in process as well as completed work orders from FY1996-97 through FY1998-99. Analysis of these documents revealed the following concerns:

- Inconsistency in what types of work warrant the completion of a work order;
- Inconsistent and/or inappropriate approvals;
- Lack of procedures for supervisory review of completed jobs and/or status of completion reports; and
- Work order forms are not pre-numbered, not consistently issued in order, and/or recorded in the work order logs.

The current system of processing work orders is not effective or reliable. An effective work order system establishes a systematic method of accumulating costs, establishes the basic foundation for charging cost centers, and allows management to track work and document needed resources to implement and operate an on-going maintenance function.

### **RECOMMENDATION**

**Work order policies and procedures should be developed. The policies and procedures should outline the type of work that warrants preparing a work order, handling of routine and special work requests, voiding of work orders, assigning batches of blank work orders, etc. The Schools should develop and implement a computerized tracking and monitoring system for work orders which allows management to assess the quality of work performed, the frequency of requests, and allows for the accountability of inventory. Finally, the Schools should increase their budgetary requests for repair and maintenance to provide adequate funding for preventive maintenance to ensure the safety of its staff and equipment.**

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### Compliance:

#### **EMPLOYEE FILES DID NOT CONTAIN ADEQUATE DOCUMENTATION TO SUPPORT CERTAIN PERSONNEL ACTIONS.**

We judgmentally selected a sample of 181 employees (35 at the Division, 42 at NCSD, 52 at ENCSD, and 52 at CNCSD) and examined their personnel files, position descriptions, applicable hiring packets, vacancy listings, background check documentation, drug test documentation, and performance evaluations. This documentation was reviewed to determine whether personnel files complied with State rules and regulations and whether employees were qualified for their positions. Analysis of these documents indicated that overall the Division and the schools were in compliance with regulations. However, we noted 62 instances within the 181 files reviewed, a 34% error rate, where the documentation was either inadequate or missing. Problems included such items as lack of the employee's original application, lack of documentation of drug tests, lack of documentation for transfers and/or promotions, or lack of criminal background checks. Table 10 summarizes the number and frequency of errors by location.

| Table 10<br>Summary of Personnel Files Review                      |             |        |                |
|--|-------------|--------|----------------|
| LOCATION   | SAMPLE SIZE | ERRORS | PERCENT ERRORS |
| Division   | 35          | 13     | 37%            |
| NCSD   | 42          | 9      | 21%            |
| ENCSD  | 52          | 14     | 27%            |
| CNCSD  | 52          | 20     | 38%            |
| Totals   | 181         | 62     | 34%            |
| Source: Compiled by OSA from Division and Schools' Personnel Files |             |        |                |

The lack of documentation could place the Division and Schools at risk should an employee file a grievance or lawsuit. Also, the failure to complete and document background checks and drug tests would prevent the schools from being in compliance with Department policy and GS §143B – 146.15. The safety of the students and deaf consumers is put at risk when background checks and drug tests are not performed. Lastly, a number of employee transfers and position reallocations included in the sample were based on school management decisions, giving the appearance that the hiring process is unfair. Continuation of this practice could negatively affect employee morale.

### **RECOMMENDATION**

**Division and School management should ensure personnel files comply with OSP regulations and Department policy by containing all relevant records for each employee. In addition, each personnel office should review all files to ensure that all necessary documents are retained to support hiring decisions and reduce the potential for grievances or lawsuits. School management should ensure that all promotional opportunities are posted and comply with OSP regulations. Lastly, management should ensure that all personnel documentation is securely located within the personnel office to reduce the possibility for lost or destroyed documentation.**

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### ANNUAL PERFORMANCE EVALUATIONS WERE NOT COMPLETED AS REQUIRED BY STATE PERSONNEL POLICY.

Section 12 of the State Personnel Manual requires each department to maintain an operative performance management system. The purpose of the Performance Management System is to generate objectives for employee performance, monitor progress towards set goals, and to evaluate actual performance on an annual basis. This system requires the establishment of an annual work plan at the beginning of the annual work cycle, an interim review at least once during the year, and an annual performance evaluation at the end of the cycle for each employee. The Office of State Personnel (OSP) also mandates that the employee, supervisor, and manager sign these forms to document the completion of the process. The Division's and School's personnel sections are responsible for entering yearly performance evaluation data into the OSP Personnel Information Management System (PMIS). The data is then used as the basis for legislative pay increases, merit-based raises, and cost-of-living adjustments.

Although the Department has an established performance management system, our review of a sample of 239 files for the 1997-98 work cycle indicated that the Division and schools did not consistently administer the performance management system. Table 11 summarizes the deficiencies noted.

| TABLE 11<br>REVIEW OF PERFORMANCE EVALUATIONS  |             |        |                |             |        |                |             |        |                |             |        |                |
|--|-------------|--------|----------------|-------------|--------|----------------|-------------|--------|----------------|-------------|--------|----------------|
| ERROR DESCRIPTION  | DIVISION    |        |                | NCSD        |        |                | ENCSD       |        |                | CNCSD       |        |                |
|  | SAMPLE SIZE | ERRORS | PERCENT ERRORS | SAMPLE SIZE | ERRORS | PERCENT ERRORS | SAMPLE SIZE | ERRORS | PERCENT ERRORS | SAMPLE SIZE | ERRORS | PERCENT ERRORS |
| Performance evaluations had not been completed   | 35          | 16     | 46%            | 58          | 0      | 0%             | 52          | 6      | 12%            | 94          | 1      | 1%             |
| Performance evaluation could not be located for employee   | 35          | 3      | 9%             | 58          | 1      | 2%             | 52          | 0      | 0%             | 94          | 17     | 18%            |
| Performance appraisal appears to be written by employee and signed by supervisor                       | 35          | 0      | 0%             | 58          | 0      | 0%             | 52          | 1      | 2%             | 94          | 0      | 0%             |
| Internal rating changed prior to sending the document to OSP without documented explanation for change | 35          | 0      | 0%             | 58          | 0      | 0%             | 52          | 0      | 0%             | 94          | 3      | 3%             |
| Non-supervisory personnel signed performance evaluations   | 35          | 0      | 0%             | 58          | 11     | 19%            | 52          | 0      | 0%             | 94          | 0      | 0%             |

Source: Division of Services for the Deaf and the Hard of Hearing and Schools for the Deaf performance evaluation files

### RECOMMENDATION

Performance management is an integral part of total management, influencing the selection, staffing, discipline, training, and development of an agency and its employees. The Department, Division, and Schools should maintain an operative performance management system as required by State regulations. The Division and School management should ensure that all supervisors complete employee evaluations timely. In addition, the Division and School management should inform all staff that performance appraisals are not to be completed by the employees but by the appropriate supervisor.

**Auditors Note:** As required by statute, we have notified OSP of the non-compliance to the Performance Management System regulations.

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### **THE TIME KEEPING SYSTEM DOES NOT ACCURATELY REFLECT TIME WORKED OR LEAVE BALANCES.**

We obtained and reviewed time sheets for the period of December 1997 through April 1999 for the 181 employees in our personnel sample. We analyzed the time sheets to determine whether employees were accurately reporting time worked, whether leave balances were properly calculated, and whether time sheets were reviewed and approved by proper individuals. Our analysis uncovered 8,990 instances of non-compliance to policies and procedures such as incomplete or missing documents, missing signatures, hours recorded as worked which were not, leave hours incorrectly recorded, etc. The number of absolute (the total number of positive and negative errors added together) errors noted by location were: Division-854 errors affecting 8,195 hours; NCSD-356 errors affecting 1,475 hours; ENCSD-382 errors affecting 1,954 hours; and CNCSD 7,398 errors affecting 9,729 hours. While we are unable to attach specific dollar amount to these errors, the average hourly rate for all employees is \$11.40. This means that these errors could have affected the operating budgets of the Schools and the Division by as much as \$243,424.

We learned during the audit that individual employees were not responsible for completing their time sheets. Rather, "timekeepers" completed the timesheets using data from sign-in sheets. The completed timesheets were given to the employee and his/her supervisor for signature and approval. However, we noted instances where employees at different levels were not following established policy of signing in and out during the work day. Employee interviews indicated that some senior-level staff at NCSD and CNCSD were not signing in each day as required by school policy. At NCSD we noted that the Superintendent and the Facilities Maintenance Manager were not complying with policy. At CNCSD we noted that there are five different types of sign-in sheets currently being used. Also, we noticed that the Superintendent, Volunteer Services Coordinator, School Psychologist, and Business Officer were not complying with the sign-in policy.

In our opinion, the current time keeping process significantly contributes to the large number of errors found. Our analysis shows that this system does not prevent and detect errors. The use of the timekeepers adds an unnecessary step to the process and appears to cause the employees to inadequately review their time sheets. The errors lead to employees receiving the wrong amounts of leave and being paid the wrong amount for overtime or shift premium work. We also noted confusion and inconsistency in applying time worked to the work day and the work week as well as the Division's flex time policy.

### **RECOMMENDATION**

**Management should immediately establish one effective time-keeping system to be used by all locations. Every employee should be responsible for documenting his or her time worked and leave earned/taken. Supervisors should be responsible for observing employee work habits and approving completed time sheets. Employees, supervisors, and the**

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**payroll clerk should conduct a more thorough review of monthly time sheets. Management should follow all policies implemented to set an example for staff.**

### **INTERNAL CONTROLS AT THE SCHOOLS ARE INADEQUATE TO ENSURE THE ACCURACY OF OVERTIME, SHIFT PREMIUM, AND HOLIDAY PAYMENTS.**

Employees working afternoon or night shifts receive a ten percent shift premium payment and some employees are paid time and a half for working more than 40 hours in a week. We analyzed and recomputed the amount of shift premium, overtime, and holiday pay received for a random sample of employees from July 1996 through June 1999—a total of 2,001 payments. Analysis of these payments revealed:

- 188 (9%) instances where amounts calculated differed from the amount actually paid by at least \$10,
- Of these 188 miscalculations, 110 (5%) were overpayments totaling \$3,822,
- 15 (1%) were underpayments in the amount of \$1,880, and
- 63 (3%) were coding errors equaling \$363.

Furthermore, we noted 34 instances at NCSD and four instances at CNCSD, totaling \$7,201, where employees were listed on the supporting documentation as deserving shift premium, overtime, or holiday pay but these employees were not found on the premium payroll register. Also, nine NCSD employees and nine CNCSD employees were paid a total of \$1,441 on the premium payroll register but not included on the supporting documentation. At CNCSD, we noted that overtime was submitted late in three instances in FY1996-97. In addition, the problems indicated with the time sheets (see finding on page 44) further cause inaccuracies in the payment of these special payroll types.

Errors occurred due to either the Department's Central Payroll inputting hours incorrectly, the Schools calculating hours incorrectly, the Department's Central Payroll using the improper account code for adjustments, or the Department's Central Payroll calculating salary or premium rate incorrectly. These errors could be detected by review of the final payment amounts; however, no such review occurs. The supporting documentation for these payments is forwarded by the school's payroll clerk to the Department's accounting department for processing. After processing, the School does not review the payroll register to ensure that employees received the amount due. In fact, the Schools could not provide copies of several payroll registers for the period examined.

### **RECOMMENDATION**

**The payroll clerks at each school should compare the supporting documentation to the payroll register to verify that all applicable employees are included. The Department should review the accuracy of the data entered into the payroll system and the calculations contained within the payroll system.**

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### **CERTAIN ENCSO POSITIONS ARE MISCLASSIFIED AND SOME CERTIFIED STAFF ARE BEING PAID INCORRECTLY.**

As part of the audit, we compared duties as described in position classifications to actual duties. We also verified that employees in our personnel sample were paid correctly. During this examination we noted two instances of non-compliance.

- Student Support Services Principal directly supervises eight DPI certified staff, based on interviews and review of performance evaluations, not the required 11 to 21 to receive pay at the Principal II level. We conclude that this position is misclassified and that the organizational chart does not reflect actual reporting lines and responsibilities.
- The high school principal, categorized as a Principal IV, supervises 25 teaching positions, not the 33 to 43 required for Principal IV status. The number of positions supervised qualify this person for Principal III status and corresponding pay.

Further, we reviewed the years of experience, level of certification, and salary for all principal, teaching, and certified staff to verify correct salaries based on the DPI pay scale. During the review, we noted that of the 91 applicable staff, one principal and two teaching staff members were paid incorrectly for the 1998-99 school year. After discussion with the school's personnel section, we concluded that these staff members' years of experience were incorrectly entered into the school's personnel system. The inaccurate data resulted in a total overpayment of \$3,408 more than what the correct salaries should have been.

### **RECOMMENDATION**

**The Department's Division of Human Resources should review the responsibilities of the Student Support Services Principal and the high school Principal. This review should determine the actual reporting lines and responsibilities and the proper pay classification. Classification titles and resulting pay grades should be representative of the actual duties assigned to the position. Changes made as a result of the review in title classifications or lines of authority should be promptly communicated to all applicable staff. Additionally, the school's personnel office, in conjunction with the Department's Controller's Office, should review all payroll system information to verify that the correct data has been entered. The personnel office should compare information in the DPI License and Salary Information Center database to school records to ensure accuracy. All staff being paid incorrectly should be notified and the inaccurate payments corrected.**

### **THE DIVISION AND SCHOOLS ARE NOT COMPLYING WITH STATE REGULATIONS ON ANNUAL BUDGETS.**

State budget regulations require each state agency to conduct annual budget planning using a comprehensive process. This process includes reviewing the detail transaction ledger, analyzing variances, establishing the budget, and reviewing the budget in accordance with

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general business practices. Such planning provides assurances that the nature, timing, and extent of financial activity are efficient.

In order to audit compliance with State budget regulations, we examined variance analyses of year-end budget reports for FY1996-97, FY1997-98, and FY1998-99. We noted the following concerns:

- Lack of detailed transaction ledgers at the Schools;
- Neither the Schools nor the Division could provide details of capital improvement requests, with requests and appropriations by-passing the Division;
- Schools did not maintain adequate documentation to support expenditures;
- Expenditures charged to the wrong accounts; and
- Inability to explain significant variances at NCSD and ENCSD.

State government agencies have an inherent responsibility to be prudent using public resources. The leaders of State agencies must adhere to State regulations and must be sure that control procedures are in place to review and approve only those financial activities that are necessary, reasonable, and demonstrate an efficient use of funds. It appears a lack of training, guidance, and oversight by the Division contributed to the deficiencies noted above. Such practices may result in inefficient use of resources and may lead to inaccurate presentation of financial statements.

### RECOMMENDATION

**The Schools should comply with all provisions of the State Budget Manual including retaining budget records. Management should ensure that a detailed transaction ledger is maintained at each school. Annual budget planning should include variance analysis, establishing the budget, and budget review consistent with general business practices. The Department should ensure that the Division is informed of all budgetary transactions and the Schools should likewise implement a policy to inform the Division of all incoming funds. Staff should be adequately trained and overseen to prevent these errors from continuing.**

### **THE REGIONAL RESOURCE CENTERS EXPERIENCE DELAYS IN RECEIVING SUPPLIES, MATERIALS, AND EQUIPMENT PURCHASED THROUGH THE DIVISION OFFICE.**

Each RRC requisitions its own purchases but these purchases must be approved and processed by the Division office and then the Department Controller's Office. Items requested are often delivered to the Division office prior to forwarding to the RRC. The extensive delays were a constant concern expressed by employees during interviews. We analyzed supplies, materials, and equipment transactions for the RRCs during FY1996-97 through FY1998-99. Of the 2,027 transactions recorded, 1,093 (53.9%) were for purchases totaling less than \$250.

## **FINDINGS AND RECOMMENDATIONS**

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Use of a procurement card would enable the RRCs to "purchase" these items immediately rather than waiting for approvals or processing.

### **RECOMMENDATION**

**The Department should pursue authorization to use procurement cards for its various divisions. Each RRC would assign responsibility for the procurement card to one person who would make the purchases. The monthly statements would be sent directly to the Division and the RRC would forward supporting documentation to the Division. The Division would reconcile to the monthly statement and review the documentation to ensure reasonableness and necessity of all purchases.**

### **THERE ARE WEAKNESSES IN THE ACCOUNTABILITY AND MAINTENANCE OF FIXED ASSETS.**

All agencies are required to comply with the State policies and procedures related to fixed assets. These policies/procedures provide guidance to agencies on maintaining an accurate method of identifying individual assets, controlling their location, and in taking physical inventory. Although the Department has established policies and procedures that mirror the State requirements, the Division, Schools for the Deaf, and RRCs did not have copies and did not have written internal procedures for the management of fixed assets. We found that responsibility for maintaining the fixed asset inventory list is divided among different divisions with the Department. The Department's Controller's Office has the ultimate responsibility for making changes in the North Carolina Fixed Asset System (FAS). For the RRCs, the Division is responsible for purchasing fixed assets and submitting the necessary documentation regarding the item to the Department's Controller's Office. The Controller's Office assigns a fixed asset number to the item and enters the information into FAS. The fixed asset tag is mailed to the RRC to be put on the asset.

As part of the audit, we examined a sample of fixed assets for the Division, Schools for the Deaf, and RRCs. We conducted a physical inventory of a randomly selected sample of 1,015 assets to verify that: (1) the items were properly recorded in the fixed asset system, (2) fixed asset numbers were attached to the assets, and (3) the assets were physically secure. We traced 639 assets from the inventory list to the physical asset. Overall, 73 items (11%) could not be located. The sites with the highest percentage of items not located were: the Charlotte RRC, 36% (12 items); ENCSD, 23% (20 items); and the Division, 12% (9 items). Overall, 20% (128 items) were in the wrong location. Sites with the highest percentage of items in the wrong locations were: the Division, 35% (26 items); ENCSD, 34% (29 items); CNCSD, 28% (48 items); and NCSD, 17% (24 items).

Additionally, we traced 376 assets from their physical location to the fixed asset inventory list. Overall, 127 (34%) items in our sample were not included on the fixed asset inventory list. Sites with the largest percentage of non-compliance were: the Division, 19 items (63%);

## FINDINGS AND RECOMMENDATIONS

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NCSD, 14% (27 items); ENCSD, 21% (15 items); CNCSD, 37% (11 items); and none of the items selected at the RRCs were included on the FAS. Other problems noted were:

- No tag on the asset;
- Wrong location on the FAS listing;
- Asset descriptions and vendor names are used rather than the manufacturer's name;
- Different location description for the same location; and
- Broken and/or obsolete items remaining on the FAS.

The lack of adequate policies and procedures, training of individuals responsible for maintaining the fixed asset inventory list, and split accountability result in an ineffective process and lead to noncompliance with the State fixed asset policies.

### RECOMMENDATION

**The Division should complete written internal procedures for fixed asset management and provide them to all employees, as well as provide fixed asset management training to all employees engaged in this function. Proper documentation for relocating or surplusizing fixed assets should be maintained and additions, deletions, and modifications to the fixed asset inventory should be made timely to keep the inventory accurate. The Department should delegate the responsibility of recording, deleting, and modifying the fixed asset inventory directly to the fixed asset officer at each school and each Regional Resource Center.**

### THE SCHOOLS DID NOT ESTABLISH CONTRACTS FOR ALL PRESCHOOL SATELLITE FACILITIES.

The schools operate satellite preschools at churches, public schools, and other non-profit facilities throughout North Carolina. For most of these facilities, contracts were established outlining the timeframe, space provided, and cost. However, the schools did not execute contracts with facilities that do not charge the schools for use of space. Specifically, the Elizabethtown preschool has no contract with ENCSD and three preschool facilities in the central region of the State do not have contracts with CNCSD. Since no funds exchange hands, the schools reasoned that no contract was necessary. However, other issues with potential financial impact could arise including liability and ownership questions.

### RECOMMENDATION

**The Schools should establish contracts for all satellite preschool locations regardless of costs. These contracts should include liability designation, ownership of equipment, and insurance coverage.**

## **FINDINGS AND RECOMMENDATIONS**

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### **THE DIVISION DID NOT COMPLY WITH STATE REGULATIONS REGARDING DOCUMENTATION OF PERSONAL SERVICE CONTRACTS.**

The State Purchasing Manual requires each department, agency, and institution to initiate and maintain contractor files for personal service contracts. These contract files are to reflect information that supports the purpose of the contract along with any special considerations granted. We tested 20 contracts for each fiscal year (FY1996-97 through FY1998-99). We found that the Division did not sufficiently document its solicitation efforts for competitive bidding and that there was insufficient evidence supporting decisions to sole source certain contracts in 55 of 60 (92%) contracts reviewed. Finally, there were 14 instances (23%) where contracts were granted to spouses of Division employees without adequate documentation addressing potential conflict of interest. Inadequate documentation in contract files creates the potential for unauthorized granting of contracts and a loss of public confidence in the State purchasing process.

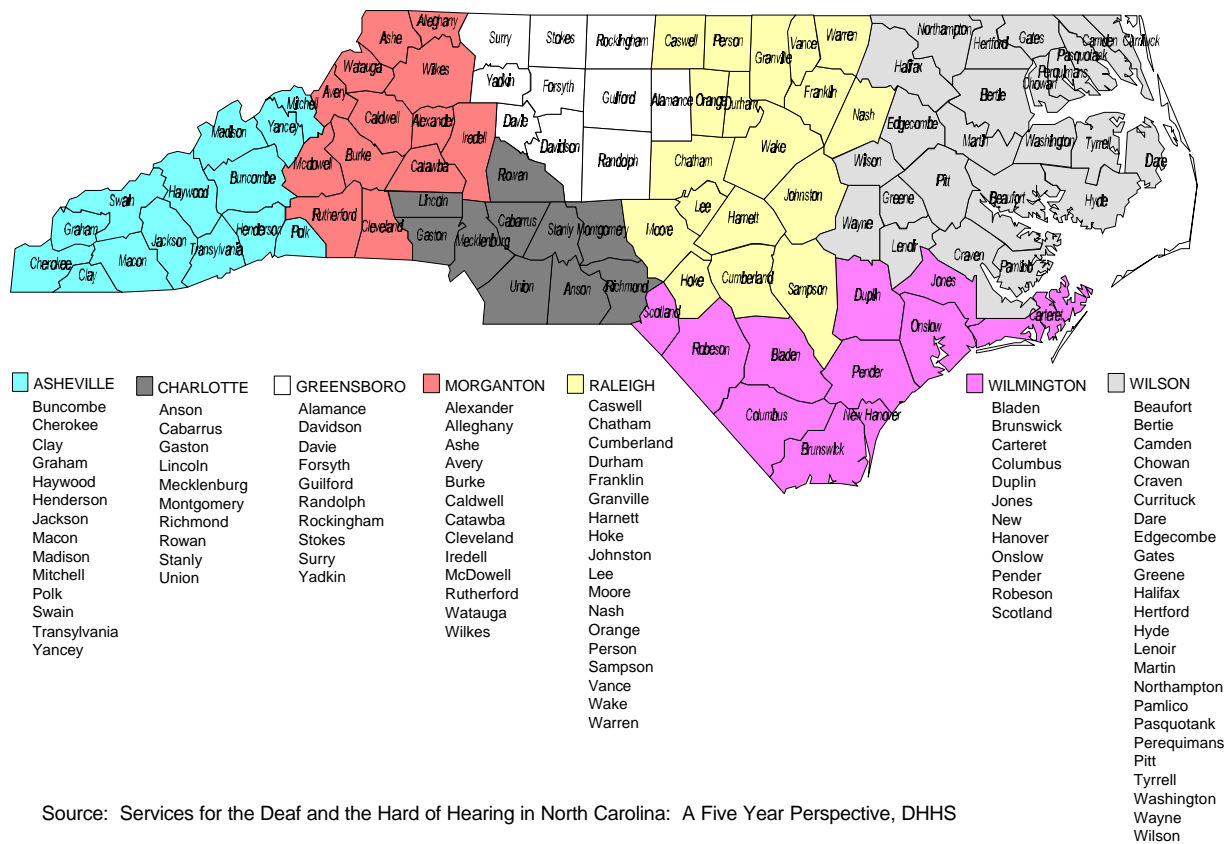
### **RECOMMENDATION**

**The Division should examine its current procedures for approving and documenting its personal service contracts. Providing oversight to the purchasing system is an integral part of total management. The Division should establish procedures to document its efforts for soliciting competitive bidding for contracts and any potential conflicts that may exist when approving contracts. The Division should comply with State purchasing regulations with regard to sole source contracts and contract file documentation.**

## PROGRAM DESCRIPTION

The Division of Services for the Deaf and the Hard of Hearing (Division) was formally established as a separate division in 1989 to provide higher community visibility, public awareness, and expanded services to the estimated 650,000 deaf and the hard of hearing citizens living in North Carolina. The Division took responsibility for the oversight of the three Schools for the Deaf, created seven regional resource centers throughout the state (See Exhibit 18) to provide local services to adults, and coordinated efforts in other areas such as early intervention and the Relay North Carolina program. (See page 56 for discussion of Relay North Carolina program.) In addition, the Council for the Deaf and the Hard of Hearing (Council) was established as an advisory council to the Division.

**EXHIBIT 18  
REGIONAL RESOURCE CENTERS  
COUNTIES SERVED BY LOCATION OF RESOURCE CENTER**



Source: Services for the Deaf and the Hard of Hearing in North Carolina: A Five Year Perspective, DHHS

The State's Schools for the Deaf utilize an individualized education program (IEP) for each student enrolled. Children ages five to 21 are eligible for school enrollment, and children ages birth to five years are offered preschool training and services at the Schools and in the 18 satellite preschool centers. The preschool centers are located in Asheville, Charlotte, Morganton, Salisbury, Shelby, Elkin, Greensboro, Ramseur, Thomasville, Winston-Salem (2

## PROGRAM DESCRIPTION

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locations), Fayetteville (2 locations), Greenville, Jacksonville, New Bern, Wilmington, and Wilson. NCSD and ENCSD offer instruction from kindergarten through twelfth grade while CNCSD provides education for kindergarten through eighth grade. During the 1998-99 school year, the total enrollment at the schools was 668. Of these students, 160 were in high school, 115 in middle school, 139 in elementary grades, and 254 were served by the preschools.

### MISSION AND VISION

The Division's stated mission is "...to provide access and equitable opportunities for deaf and hard of hearing individuals in North Carolina conducive to achievement of maximum participation and productivity in society."<sup>6</sup> Further, a 1999 planning document lists the shared beliefs of the Division that "...all deaf and hard of hearing children have unlimited potential, residential Schools for the Deaf must be maintained as model programs and statewide resources, and the Division must be a 'cradle-to-grave' resource for all deaf and hard of hearing citizens, their families, and the professionals who serve them." The Community Affairs Unit, within the Division, "...in partnership with public and private sectors, facilitates access to resources and services to enhance the quality of life of deaf, hard of hearing and deaf-blind people, and their families."

The mission of the Schools for the Deaf is "...to provide a challenging learning environment which prepares each child for a meaningful and productive life in a changing world."

### STATUTORY AUTHORITY

#### *Department of Health and Human Services*

GS §143B-138(b) vests organizational responsibility of the Division, the Schools for the Deaf, and the Council for the Deaf and the Hard of Hearing to the Department of Health and Human Services (Department). The Department is responsible for education of deaf children, promoting and assisting in the employment of deaf persons (GS §168-14), and maintaining an up-to-date list of qualified and available interpreters for deaf persons (GS §8B-6).

#### *Division of Services for the Deaf and the Hard of Hearing*

The Division of Services for the Deaf and the Hard of Hearing (Division) is responsible for the daily administration of deaf services within North Carolina. GS §143B-216.33(a) outlines the scope and purpose of the Division including:

1. Review of existing program for persons who are deaf or hard of hearing in the State and making recommendations to the Secretary for improvements.
2. Providing comprehensive residential and nonresidential educational program services for persons who are deaf or hard of hearing, aged birth to 21 years of age. (As of October 1999 this function moved to the new Division of Early Intervention and Education.)

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<sup>6</sup> "Services for the Deaf and the Hard of Hearing in North Carolina: A Five-Year Perspective" (1997)

## PROGRAM DESCRIPTION

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3. Providing a network of resource centers for local access to services such as interpreters, information and referral, telephone relay, and advocacy for persons who are deaf or hard of hearing.
4. Collecting, studying, maintaining, publishing and disseminating information relative to all aspects of deafness.
5. Promoting public awareness of the needs of resources and opportunities available to persons who are deaf or hard of hearing.
6. Providing technical assistance to agencies and organizations in the development of services to persons who are deaf or hard of hearing.
7. Administering the Telecommunications Program for the Deaf (GS §143B-216.34).
8. Establishing training and evaluation standards for determination of competency of individuals serving as interpreters for persons who are deaf or hard of hearing.

### *Schools for the Deaf and the Hard of Hearing*

The North Carolina Schools for the Deaf and the Hard of Hearing were established by GS § 115C-123 in Wilson, Greensboro, and Morganton and given the power and duty to educate "...all deaf children residents of the State who are from age five through age 20 years." Deaf children within this age range are "...eligible to and entitled to receive free tuition and maintenance." (GS §115C-124) Further, the Department is responsible for providing modern auditory training equipment, a teacher training program, and a "...comprehensive vocational and technical training program" to assist the students in becoming self-supportive.

### *Council for the Deaf and the Hard of Hearing*

The Council for the Deaf and the Hard of Hearing was established by GS §143B-216.31. Its duties are:

1. To make recommendations to the Secretary of the Department (Secretary) regarding improvement of services to the deaf and the hard of hearing.
2. To study ways to promote public understanding of the problems of the deaf and the hard of hearing and to consider the need for new State programs concerning deafness.
3. To advise the Secretary in the preparation of a plan describing the quality, extent and scope of services provided or to be provided to deaf and hard of hearing persons in the State.
4. To study any State programs that provide educational services for deaf and hard of hearing persons and to advise the Secretary and the Superintendent of Public Instruction concerning coordination of these programs to prevent duplication of services.
5. To advise and make recommendations to the Secretary regarding any matters requested by the Secretary.

The Council is composed of twenty-three members, fifteen of which are appointed by the Governor. At least three of the Governor's appointees must be deaf and three others must be hard of hearing. Three appointments must be parents of deaf or hard of hearing children with one in a residential school, one in a preschool program, and one in a mainstream education program. Other interests required include an educator that trains deaf education teachers, a licensed audiologist, President of the North Carolina Association for the Deaf, a recommendation from the North Carolina Pediatric Society, a recommendation from the President of the North Carolina Registry of Interpreters for the Deaf, and an appointment by

## PROGRAM DESCRIPTION

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the Superintendent of Public Instruction. The Speaker of the House of Representatives and the President Pro Tempore of the Senate each appoint one member. The six remaining members are appointed by the Secretary with representation from the Division of Vocational Rehabilitation, the Division of Aging, the Division of Mental Health/Developmental Disabilities/Substance Abuse Services, the Division of Social Services, a North Carolina Chapter of Self-Help for the Hard of Hearing, and Statewide Parents' Education and Advocacy for Kids (SPEAK). Members serve staggered four-year terms that cannot exceed two successive terms. The Secretary and the Division supply all clerical and other services required by the Council.

### *Division of Early Intervention and Education*

The Division of Early Intervention and Education was established by GS §143B-146.22 in 1999 and is responsible for managing the Governor Morehead School (for the visually impaired) and the three residential deaf schools. The purpose of creating a Division of Early Intervention and Education is to focus management attention and resources on:

1. Improving student academic and post-secondary outcomes.
2. Increasing staff development and training.
3. Achieving administrative consistency and access to expert support services across campuses.
4. Strengthening collaborative relationships with local education agencies and with the State Board of Education.

The Division of Early Intervention and Education is led by a Superintendent of Education Services. The Superintendent is to implement a support team of managers and specialists at the division-level that will include, at a minimum, individual managers responsible for business management services, clinical services, and early intervention services.

## ORGANIZATIONAL STRUCTURE AND STAFFING

Exhibit 19, page 55 depicts the organizational structure for the Division of Services for the Deaf and the Hard of Hearing in place at the beginning of the audit<sup>7</sup>. The Division consisted of six major functions. Below, we outline the duties and responsibilities of the major areas within the Division at the beginning of the audit.

The **Director** provided agency-wide oversight, planning, and day-to-day management of the services and activities of the Division. A Deputy Director and an office assistant provided support in the administration of the Division. The roles of staff development and computer operations are also provided by the Director's office.

The Division's **Budget Office** handled the Division's and schools' financial and budgeting operations. This function was led by a Budget Officer who directly supervised three employees in the Division office and indirectly oversaw the Business Officers at the three

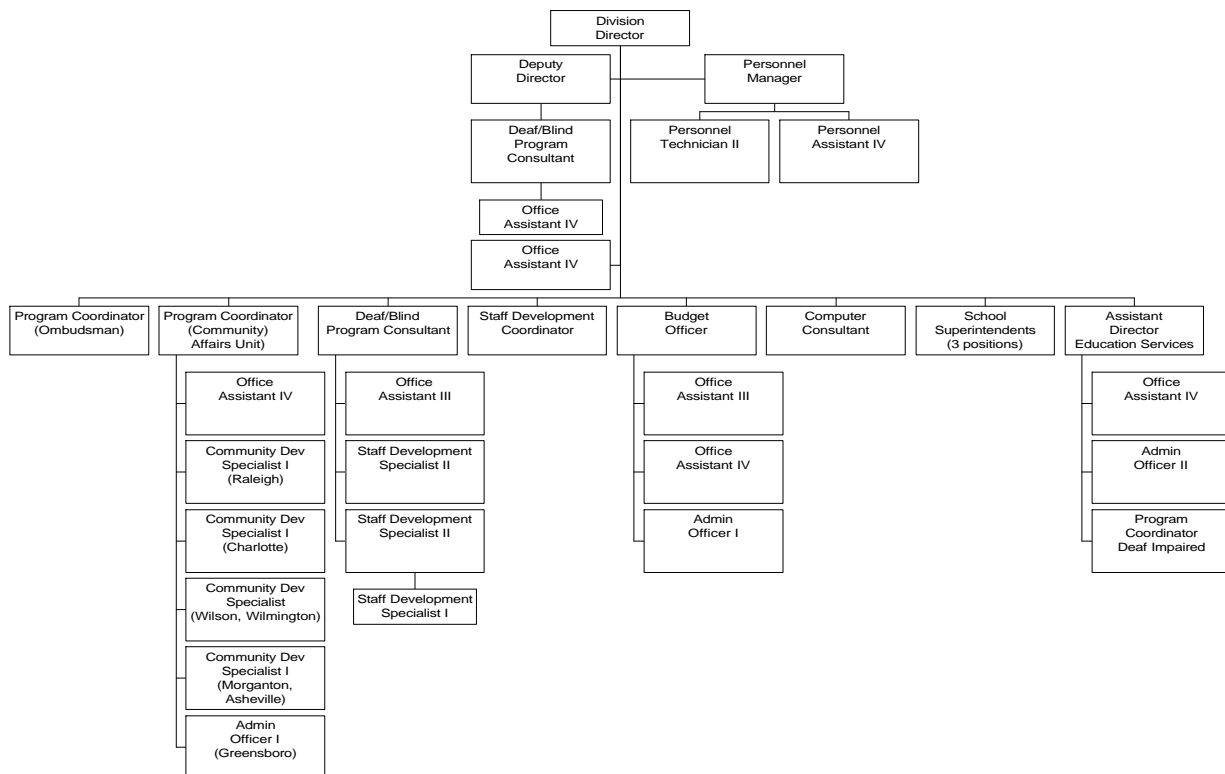
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<sup>7</sup> The Division of Early Intervention and Education was established in October 1999. This new division includes 13 new positions, 8 positions transferred from the Division of Services for the Deaf and the Hard of Hearing, and 2 positions moved from the Division of Services for the Blind.

## PROGRAM DESCRIPTION

schools. The Division Budget Office performed all financial transactions for the Division and the regional resource centers. Also, the Budget Office approved purchases, contracts, and budget revisions for the schools. As of October 1999, the positions and budget functions for the schools were transferred to the new Division of Early Intervention and Education. The budget functions for the Division and regional resource centers are performed by the Division of Services for the Blind. (See "Issues for Further Study" on page 63.)

### EXHIBIT 19 DIVISION OF SERVICES FOR THE DEAF AND THE HARD OF HEARING CENTRAL ADMINISTRATIVE OFFICE ORGANIZATIONAL CHART AS OF MARCH 1999



Source: Division of Services for the Deaf and the Hard of Hearing

## PROGRAM DESCRIPTION

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Personnel operations at the Division did not fall within the direct supervision of the Director. Rather, the **Personnel Office** reported to the Department's Division of Human Resources. These three Division employees provided human resources consultation and support to the management and staff of the Division and regional resource centers. Services provided included overseeing all aspects of personnel management including recruiting, hiring, and orientating new staff as well as administration of State policies, procedures and guidelines. The Division of Human Resources directly supervised the personnel technicians at each School for the Deaf offering policy guidance and consultation. As of October 1999, two positions were transferred to the new Division of Early Intervention and Education and one position was transferred to the Division of Vocational Rehabilitation (VR). VR performs personnel functions for the Divisions of Vocational Rehabilitation, Services for the Blind, and Services for the Deaf and the Hard of Hearing.

The Division **Ombudsman** protected the rights of the deaf and the hard of hearing citizens in North Carolina and acted as an employee advocate within the Division. Investigative and consultative services ensured that programs and services are provided as guaranteed by law. The Ombudsman responded to all allegations, complaints, and concerns and provided advocacy services to consumers, their families, and employees, as requested, to ensure appropriate and complete services were being provided in accordance with State and Federal laws. The Ombudsman reported to the Director. As of October 1999, the position and function were transferred to the new Division of Early Intervention and Education. The Division is negotiating with the Department's Careline<sup>8</sup> to provide alternate customer support services.

The **Community Affairs Unit** (CAU) was "...established to develop and provide direct services for the deaf, hard of hearing, deaf-blind and deaf with other disabilities" and management and support of the seven regional resource centers across the state. The CAU provides interpreter assessment and training, assists with research and development of new community-based programs and the expansion of existing programs, and administers the Relay North Carolina service. The primary role of the CAU is to provide access for the deaf and the hard of hearing individuals to services. This unit consists of five positions overseeing program development, two persons administering Relay North Carolina, and 34 employees at the regional resource centers (RRC).

The Relay North Carolina section was established in 1991 after passage of the Americans with Disabilities Act and enables people who use text telephones (TTY's) or personal computers to communicate with those who use voice telephones, and vice versa, at no additional charge, 24 hours a day, 365 days per year. Professionally-trained communication assistants connect users to those using regular voice phones and "convey" the fully-confidential conversation from one to the other. The Relay North Carolina program also purchases and distributes telecommunication devices and equipment to qualified citizens and requires that certain public safety and medical facilities and emergency systems operate

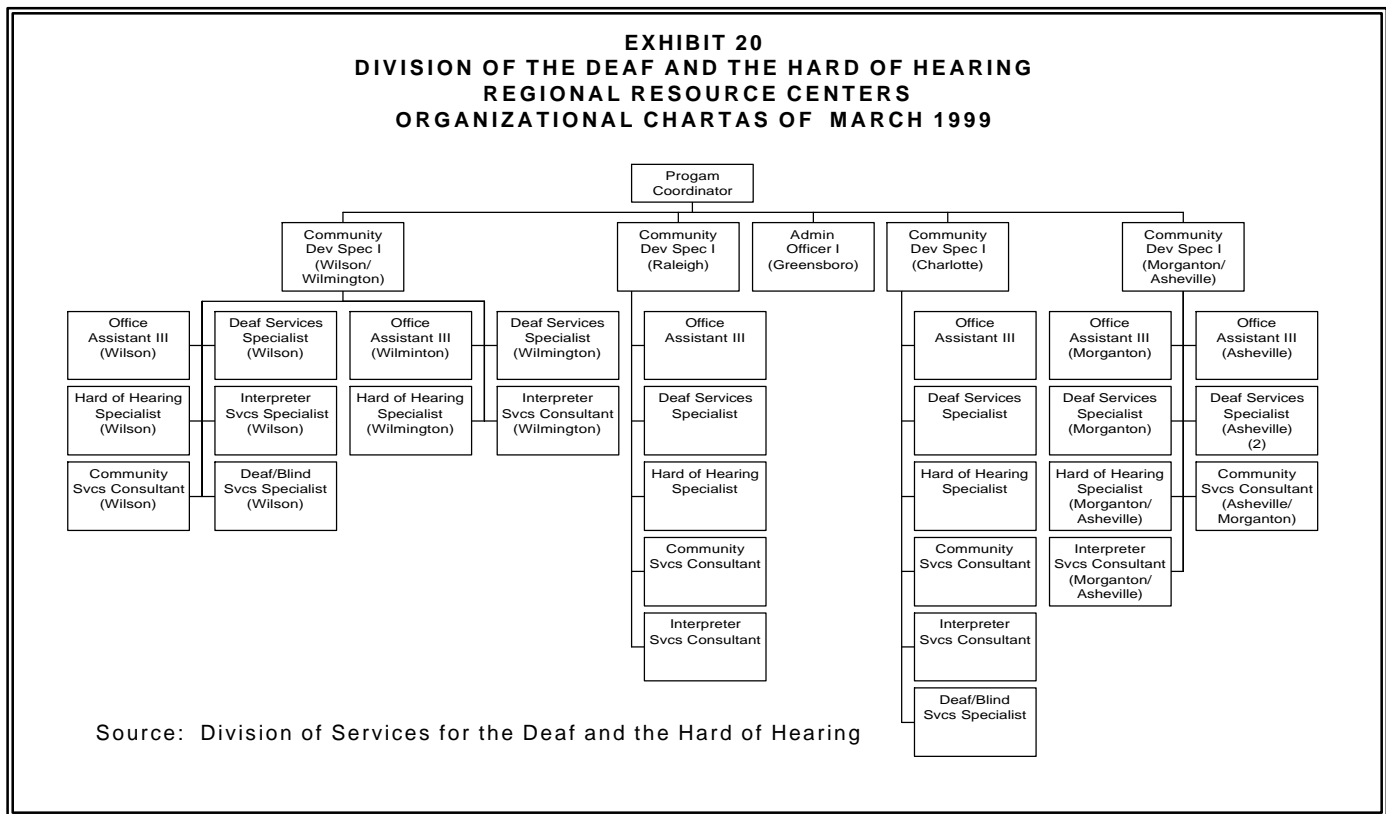
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<sup>8</sup> Careline is the customer service information/referral service for Department customers.

## PROGRAM DESCRIPTION

telecommunications devices. These programs are funded through surcharges of \$.07 per line on each monthly residential customer phone bill.

The RRCs assists in referring individuals or businesses to certified interpreters, collaborating with community organizations, training the general public (including law enforcement, hospitals, and public safety organizations) regarding deaf issues and communication devices, and reaching out to deaf and hard of hearing citizens. The seven RRCs are staffed with a varying number of employees from one to seven. Each RRC (except Greensboro with a sole staff member) is led by a manager and includes specialists in deaf, hard of hearing, communication, and interpreting services. (See Exhibit 20)



The **Education** section<sup>9</sup> managed the three Schools for the Deaf and early intervention programs. In North Carolina, services begin when a child's hearing loss is identified. BEGINNINGS for Parents for Hearing Impaired Children, a non-profit organization operating under contract to the Division, provides comprehensive information and support to families in the critical time after identification of a child's hearing loss. The early intervention employees collect and report data for the preschool programs and participate in research and planning regarding the education of children who are deaf and hard of hearing.

For students age five through 21, North Carolina offers comprehensive services at each of the Schools for the Deaf or support services for those whose families have chosen to place them

<sup>9</sup> This section was transferred to the Division of Early Intervention and Education in October 1999.

## PROGRAM DESCRIPTION

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in a mainstream public school. Staff members also serve as a resource for teachers of mainstreamed students, and interpreters may accompany residential school students to classes taken in public schools. The students at the Schools for the Deaf consist of traditional day students and residential students who arrive each Sunday evening and return home on Friday afternoon. Of the 414 students enrolled during 1998-99, 154 were day students and 260 were residential students.

The *North Carolina School for the Deaf* (NCSD) was established in Morganton in 1891 and was the first North Carolina school created solely for the education of deaf and hard of hearing children. Currently, NCSD serves the 46 counties of western North Carolina and had a total student enrollment of 240 during 1998-99. The school serves kindergarten through twelfth grade (142 students) in addition to a preschool program (98 children) that includes six satellite sites. A Superintendent oversaw the 264 employees on campus. At the time the audit began, the Superintendent reported to the director of the Western Carolina Center, a local institution for mental retardation, not to the Director of the Division of Services for the Deaf and the Hard of Hearing.

The *Eastern North Carolina School for the Deaf* (ENCSD), located in Wilson, opened in 1965. ENCSD serves 55 eastern North Carolina counties and offers preschool programs and kindergarten through twelfth grade instruction. The 1998-99 enrollment at ENCSD was 295, with 102 preschool students at the school and seven satellite programs and 193 students in kindergarten through grade twelve. The 304 employees were managed by a Superintendent reporting to the Division director.

The *Central North Carolina School for the Deaf* (CNCSD) began classes in 1971 in Greensboro. CNCSD serves 19 counties and includes a preschool program and courses for kindergarten through eighth grade. Upon completion of eighth grade, CNCSD students enroll at either NCSD or ENCSD based upon their geographic location. During the 1998-99 school year, CNCSD had a total enrollment of 133 with 54 preschool children at five satellite programs and 79 elementary and middle school students. The Superintendent who oversees the school managed 121 employees and reported to the Division director.

### EDUCATIONAL POLICIES

North Carolina has maintained a Standard Course of Study since 1898. Since that time, the curriculum has been revised periodically to reflect the changing needs of students and society. The most recent revision of the State curriculum occurred in 1985. The Standard Course of Study is followed by the three residential Schools for the Deaf.

The North Carolina Standard Course of Study (adopted as policy by the State Board of Education) sets content standards and describes the curriculum which should be made available to every child in North Carolina's public schools. It includes the subject or skills areas of arts education, English language arts, guidance, healthful living, information/computer skills, mathematics, science, second language studies, social studies, and workforce development education. Also included are the philosophy and rationale underlying the curriculum frameworks and considerations for developing a thinking

## PROGRAM DESCRIPTION

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framework, aligning curriculum and assessment, and providing for the needs of exceptional children.

The revised Standard Course of Study has moved from a detailed, prescriptive curriculum guide to a more flexible guide to instruction, emphasizing what students should know and be able to do as they progress through various levels of proficiency and ultimately exit from high school. The revised curriculum focuses on themes and concepts rather than isolated facts. It emphasizes thinking skills and problem solving more than the memorization and recall of information.

### *Hearing-impaired children mainstreamed into the public school system*

A majority of hearing-impaired children in North Carolina attend traditional public schools. During the 1998-99 school year, 1,729 students who attended public school were reported as hearing-impaired by the Department of Public Instruction. For the school years 1997-98 and 1996-97, the numbers of hearing-impaired students were 1,720 and 1,714, respectively. These numbers do not include students who are classified as deaf/blind or multi-handicapped.<sup>10</sup>

Public schools are required to follow the same admission procedures for hearing-impaired students as the State Schools for the Deaf.

#### Required Screenings and Evaluations

- vision screening
- Usher Syndrome screening (after age 12)
- audiological evaluation
- educational evaluation
- otological evaluation
- speech-language evaluation

#### Recommended Screenings and Evaluations

- health screening
- psychological evaluation
- adaptive behavior evaluation
- ophthalmological or optometric evaluation
- social history

Mainstreamed hearing-impaired students have Individualized Education Programs (IEP) just like students at the Schools for the Deaf. The process is the same regardless of where the student attends school.

The public schools provide interpreters for hearing-impaired students, if needed. The number of interpreter positions in public schools during the 1995-96 school year was 181.6. This increased to 201.5 positions in 1996-97 and to 206 positions in 1997-98.

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<sup>10</sup> We were unable to ascertain the exact number of these students from the records provided by the Department of Public Instruction.

## PROGRAM DESCRIPTION

Hearing-impaired students mainstreamed into the public schools follow the Standard Course of Study (SCS) unless there is a statement in the student's IEP explaining why he/she will not be participating in required state testing and/or the SCS. Depending upon the abilities of the individual students, they may not be instructed at the correct grade level for their age. Mainstreamed students must meet the same graduation requirements as hearing students. They also have the option of taking the Occupational Course of Study if their IEP team determines that the Standard Course of Study is inappropriate for them.

### BUDGETARY DATA

Table 12 summarizes the financial data for the Division for FY1995-96 through FY1998-99. The Division is funded through the normal budgetary process within the Department of Health and Human Services. However, funding for capital improvements may be made directly to an individual school for the deaf. In addition, the Schools may receive Federal grants for specific programs. Expenditures at the Schools have increased dramatically over the past four years with major building renovations and improvements at the Schools and legislative recognition of the needs of the campuses.

| <b>TABLE 12</b><br><b>DIVISION OF SERVICES FOR THE DEAF AND THE HARD OF HEARING</b><br><b>BUDGETARY/FINANCIAL DATA -- FY 1995-96 THROUGH FY 1998-99</b> |                     |                     |                     |                     |
|---|---------------------|---------------------|---------------------|---------------------|
| <b>DIVISION</b>   | <b>FY95-96</b>      | <b>FY96-97</b>      | <b>FY97-98</b>      | <b>FY98-99</b>      |
| <b>Expenditures</b>   |                     |                     |                     |                     |
| Personal Services   | \$ 1,030,972        | \$ 907,307          | \$ 693,303          | \$ 675,783          |
| Purchased Services  | 1,130,839           | 1,073,008           | 555,270             | 598,861             |
| Supplies  | 44,792              | 16,428              | 19,344              | 9,627               |
| Property, Plant, Equipment  | 357,913             | 45,083              | 38,847              | 25,481              |
| Other Expenses  | 166,066             | 243,019             | 528,144             | 822,991             |
| Intragovernmental Transfers   | 47,237              | (112,611)           | 26,286              | 316,632             |
| <b>Total Expenditures</b>   | <b>\$ 2,777,819</b> | <b>\$ 2,172,234</b> | <b>\$ 1,861,194</b> | <b>\$ 2,449,375</b> |
| <b>Revenues</b>   |                     |                     |                     |                     |
| Sales and Services  | \$ 219              | \$ 46,964           | \$ 6,416            | \$ 451              |
| Fees  | 3,500               | 3,800               | 5,170               | 3,460               |
| Miscellaneous   | 185                 | 288                 | 285                 | 1                   |
| Intragovernmental Transfers   | 599,025             | 45,568              | 1,250               | 288,814             |
| <b>Total Revenues</b>   | <b>\$ 602,929</b>   | <b>\$ 96,620</b>    | <b>\$ 13,121</b>    | <b>\$ 292,726</b>   |
| <b>Appropriations</b>   | <b>\$ 2,174,890</b> | <b>\$ 2,075,614</b> | <b>\$ 1,848,073</b> | <b>\$ 2,156,649</b> |
| <b>NCSD</b>   |                     |                     |                     |                     |
| <b>Expenditures</b>   |                     |                     |                     |                     |
| Personal Services   | \$ 7,041,546        | \$ 6,901,999        | \$ 7,024,442        | \$ 7,781,976        |
| Purchased Services  | 802,532             | 812,516             | 876,535             | 925,650             |
| Supplies  | 317,732             | 350,698             | 437,595             | 447,396             |
| Property, Plant, Equipment  | 298,214             | 271,635             | 424,746             | 447,988             |
| Other Expenses  | 19,328              | 113,932             | 94,710              | 35,723              |
| Intragovernmental Transfers   | 7,222               | 218,507             | 296,749             | 116,407             |
| <b>Total Expenditures</b>   | <b>\$ 8,486,574</b> | <b>\$ 8,669,287</b> | <b>\$ 9,154,777</b> | <b>\$ 9,755,140</b> |
| <b>Revenues</b>   |                     |                     |                     |                     |
| Sales and Services  | \$ 114,419          | \$ 123,896          | \$ 98,960           | \$ 44,559           |
| Fees  | 452                 | 228                 | -                   | 31                  |
| Donations and Gifts   | 3,529               | -                   | -                   | -                   |
| Miscellaneous   | 16,869              | 8,400               | 7,045               | 7,701               |
| Intragovernmental Transfers   | 89,570              | 74,852              | 255,615             | 213,075             |
| <b>Total Revenues</b>   | <b>\$ 224,839</b>   | <b>\$ 207,376</b>   | <b>\$ 361,620</b>   | <b>\$ 265,366</b>   |
| <b>Appropriations</b>   | <b>\$ 8,261,735</b> | <b>\$ 8,461,911</b> | <b>\$ 8,793,157</b> | <b>\$ 9,489,774</b> |

## PROGRAM DESCRIPTION

| TABLE 12 (Continued)            |                     |                     |                      |                      |
|---------------------------------|---------------------|---------------------|----------------------|----------------------|
|                                 | FY95-96             | FY96-97             | FY97-98              | FY98-99              |
| <b>ENCSD</b>                    |                     |                     |                      |                      |
| <b>Expenditures</b>             |                     |                     |                      |                      |
| Personal Services               | \$ 7,590,422        | \$ 7,917,817        | \$ 8,486,096         | \$ 9,345,092         |
| Purchased Services              | 957,267             | 999,770             | 1,118,134            | 1,304,409            |
| Supplies                        | 300,774             | 394,035             | 369,089              | 425,078              |
| Property, Plant, Equipment      | 209,622             | 352,018             | 229,174              | 331,458              |
| Other Expenses                  | 43,024              | 46,634              | 81,362               | 82,404               |
| Intragovernmental Transfers     | 26,182              | 76,072              | 202,469              | 45,133               |
| <b>Total Expenditures</b>       | <b>\$ 9,127,291</b> | <b>\$ 9,786,346</b> | <b>\$ 10,486,324</b> | <b>\$ 11,533,574</b> |
| <b>Revenues</b>                 |                     |                     |                      |                      |
| Sales and Services              | \$ 27,627           | \$ 51,801           | \$ 21,278            | \$ 26,949            |
| Fees                            | 1,746               | 210                 | 195                  | 66                   |
| Donations and Gifts             | -                   | -                   | -                    | -                    |
| Miscellaneous                   | 5,611               | 2,793               | 11,191               | 6,626                |
| Intragovernmental Transfers     | 131,299             | 175,577             | 184,233              | 304,191              |
| <b>Total Revenues</b>           | <b>\$ 166,283</b>   | <b>\$ 230,381</b>   | <b>\$ 216,897</b>    | <b>\$ 337,832</b>    |
| <b>Appropriations</b>           | <b>\$ 8,961,008</b> | <b>\$ 9,555,965</b> | <b>\$ 10,269,427</b> | <b>\$ 11,195,742</b> |
| <b>CNCSD</b>                    |                     |                     |                      |                      |
| <b>Expenditures</b>             |                     |                     |                      |                      |
| Personal Services               | \$ 3,309,731        | \$ 3,493,771        | \$ 3,677,922         | \$ 4,097,728         |
| Purchased Services              | 459,987             | 637,852             | 797,213              | 879,943              |
| Supplies                        | 153,925             | 215,981             | 234,832              | 245,685              |
| Property, Plant, Equipment      | 181,448             | 405,799             | 226,746              | 278,349              |
| Other Expenses                  | 10,202              | 2,786               | 17,679               | 10,763               |
| Intragovernmental Transfers     | 97,677              | 22,824              | 101,540              | 91,607               |
| <b>Total Expenditures</b>       | <b>\$ 4,212,970</b> | <b>\$ 4,779,013</b> | <b>\$ 5,055,932</b>  | <b>\$ 5,604,075</b>  |
| <b>Revenues</b>                 |                     |                     |                      |                      |
| Sales and Services              | \$ 7,162            | \$ 8,223            | \$ 22,666            | \$ 11,123            |
| Fees                            | 135                 | 27                  | 42                   | 2,212                |
| Donations and Gifts             | 2,250               | 500                 | -                    | 4,017                |
| Miscellaneous                   | 1,970               | 130                 | 2,312                | 108                  |
| Intragovernmental Transfers     | 33,812              | 129,072             | 40,048               | 154,787              |
| <b>Total Revenues</b>           | <b>\$ 45,329</b>    | <b>\$ 137,952</b>   | <b>\$ 65,068</b>     | <b>\$ 172,247</b>    |
| <b>Appropriations</b>           | <b>\$ 4,167,641</b> | <b>\$ 4,641,061</b> | <b>\$ 4,990,864</b>  | <b>\$ 5,431,828</b>  |
| <b>RRC</b>                      |                     |                     |                      |                      |
| <b>Expenditures</b>             |                     |                     |                      |                      |
| Personal Services               | \$ 1,562,815        | \$ 1,596,642        | \$ 1,603,555         | \$ 1,441,091         |
| Purchased Services              | 575,092             | 520,157             | 508,692              | 616,523              |
| Supplies                        | 35,512              | 35,086              | 38,411               | 25,553               |
| Property, Plant, Equipment      | 27,551              | 100,318             | 124,852              | 22,281               |
| Other Expenses                  | 10,949              | 13,266              | 13,618               | 17,333               |
| Intragovernmental Transfers     | (73)                | (1,744)             | 91                   | 71,862               |
| <b>Total Expenditures</b>       | <b>\$ 2,211,846</b> | <b>\$ 2,263,725</b> | <b>\$ 2,289,219</b>  | <b>\$ 2,194,643</b>  |
| <b>Revenues</b>                 |                     |                     |                      |                      |
| Sales and Services              | \$ 31,616           | \$ 536              | \$ 500               | \$ 500               |
| Fees                            | 5,759               | -                   | -                    | 3,235                |
| Donations and Gifts             | -                   | -                   | -                    | -                    |
| Miscellaneous                   | -                   | -                   | -                    | -                    |
| Intragovernmental Transfers     | 101,290             | 69,927              | 116,024              | 172,462              |
| <b>Total Revenues</b>           | <b>\$ 138,665</b>   | <b>\$ 70,463</b>    | <b>\$ 116,524</b>    | <b>\$ 176,197</b>    |
| <b>Appropriations</b>           | <b>\$ 2,073,181</b> | <b>\$ 2,193,262</b> | <b>\$ 2,172,695</b>  | <b>\$ 2,018,446</b>  |
| Source: Division Budget Reports |                     |                     |                      |                      |

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## **ISSUES FOR FURTHER STUDY**

1. As noted in the text, the Division of Early Intervention and Education was created during the audit and the three Schools for the Deaf were transferred to it as of October 1, 1999. This leaves the Division of Services for the Deaf and the Hard of Hearing with approximately 60 positions in the Division offices and the seven RRCs. Since the responsibilities of this Division have been greatly reduced, it may be advisable to combine this Division with another smaller division such as the Division of Services for the Blind whose school was also transferred to the new Division of Early Intervention and Education. As noted earlier, personnel functions for both these divisions are now being performed by staff in the Division of Vocational Rehabilitation. Consolidating these now separate divisions could reduce administrative costs for both divisions and free up monies for program services. We strongly urge the Department of Health and Human Services to explore this alternative.
2. In conducting the audit, we observed NCSD's campus adjoins Broughton State Hospital and ENCSD's campus adjoins the North Carolina Special Care Center. Each institution has its own maintenance department that performs renovations, repairs, and routine maintenance functions. In addition to these tasks, each facility must expend funds to acquire equipment that remains idle at times. Combining maintenance staffs could free funds for more equipment purchases and better utilization. The schools' proximity to other institutions warrants further study regarding the feasibility of combining the maintenance functions. We feel the Division of Early Intervention and Education should explore this issue further. Each of these facilities also has its own housekeeping, laundry, and food services. These functions should also be studied for their possible consolidation.

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## ***APPENDICES***

| <b>APPENDIX</b> | <b>DESCRIPTION</b>   | <b>PAGE</b> |
|-----------------|--|-------------|
| A               | Comparison to Other States   | 67          |
| B               | Architect's Report   | 89          |
| C               | Response from the Secretary of the Department of Health and Human Services | 169         |

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**COMPARISON TO OTHER STATES**

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Early in the audit process, the Office of the State Auditor surveyed 14 other states to obtain information about their schools for the deaf for comparison to North Carolina's. We received responses from 9 states, a 64% response rate. The following pages contain summary data from that survey. All data was considered in our assessment of program effectiveness, organizational structure, etc. Specific points noted from the survey include:

1. Seven of the schools report to their state Departments of Education while one school reports to the Governor.
2. Six states have one residential deaf school and three states have two residential deaf schools. The Florida and Virginia deaf school campuses also serve as the blind school campus.
3. All nine state schools are accredited by either state accreditation, the Southern Association of Colleges and Schools, or the Conference of Educational Administrators Serving the Deaf.
4. Five states require End-Of-Grade tests (same tests as in public schools); six states give a test of basic skills.
5. Six states require passing a standard course of study, two states require specific GPA levels, and four states require IEP (Individualized Education Program) attainment.
6. Nine states require background checks on all new employees.

As we reviewed the data obtained from these other states, we realized that, because of the differences in educational programs offered and the policies and procedures of the various states, we needed assistance in reviewing and comparing others states' operations. At that point, we contracted with three experts in the area of deaf education. The result of the consultants' work is summarized on page 71.

## COMPARISON TO OTHER STATES

MAILED: 14  
RETURNED: 9  
% RETURNED 64.3%

**NORTH CAROLINA OFFICE OF THE STATE AUDITOR**  
Performance Audit Survey of Other States'  
Services for the Deaf and the Hard of Hearing

**PURPOSE:** The Office of the North Carolina State Auditor is conducting a performance audit of our State's Div. of Services for the Deaf and the Hard of Hearing. This questionnaire will assist us in obtaining comparative data from other states regarding organizational structure, statistical data, personnel requirements, and educational programs. Please complete and return in the enclosed envelope by **Friday, June 4, 1999.**

**NUMBERS AND PERCENTAGE OF RESPONSES ARE SHOWN BELOW. PERCENTAGES MAY NOT ADD BACK TO 100% BECAUSE OF ROUNDING**

**1) Does your School for the Deaf report to: 9 RESPONSES**

|  |  |  |
|--|--|--|
| 1. State Dept. of Education<br>7 77.8% | 2. Agency or Commission for the Deaf and the Hard of Hearing<br>0 0% | 3. Div. of Rehabilitation Services/ Dept. of Human Resources<br>0 0% |
| 4. Div. of Disability Services<br>0 0% | 5. Div. of Services for the Deaf and Blind<br>0 0%                   | 6. Other (please specify)<br>2 22.2%                                 |

**2) Is the school accredited? 9 RESPONSES**

|                  |                                     |
|------------------|-------------------------------------|
| 1. Yes<br>9 100% | 2. No (skip to question #4)<br>0 0% |
|------------------|-------------------------------------|

**3) If so, by whom? 9 RESPONSES**

|  |  |   |                           |
|--|--|---|---------------------------|
| 1. A state accreditation body<br>5 55.6% | 2. Southern Association of Colleges and Schools<br>3 33.3% | 3. Conference of Educational Administrators Serving the Deaf (CEASD)<br>6 66.7% | 4. Other (please specify) |
|--|--|---|---------------------------|

**4) How many Schools for the Deaf are located in your state? 9 RESPONSES**

|                   |                   |                  |   |
|-------------------|-------------------|------------------|---|
| 1. one<br>6 66.7% | 2. two<br>3 33.3% | 3. three<br>0 0% | 4. more (please specify number)<br>0 0% |
|-------------------|-------------------|------------------|---|

**5) If there is more than one school/campus, how are students assigned to each school? 6 RESPONSES**

|                            |                               |  |                                   |
|----------------------------|-------------------------------|--|-----------------------------------|
| 1. Catchment area<br>3 50% | 2. Parental choice<br>2 33.3% | 3. Special needs (deaf/blind, behavioral problems, multi-handicapped, vocational track, etc.)<br>1 16.7% | 4. Other (please specify)<br>0 0% |
|----------------------------|-------------------------------|--|-----------------------------------|

**6) Is the school located on a campus that also serves as a campus for a School for the Blind? 9 RESPONSES**

|                   |                  |
|-------------------|------------------|
| 1. Yes<br>2 22.2% | 2. No<br>7 77.8% |
|-------------------|------------------|

**7) What percentage of the students are classified as "special needs" (including emotional or behavioral issues)? 9 RESPONSES**

|                     |                      |                      |                             |
|---------------------|----------------------|----------------------|-----------------------------|
| 1. 0-10%<br>1 11.1% | 2. 10-25%<br>4 44.4% | 3. 25-50%<br>2 22.2% | 4. more than 50%<br>2 22.2% |
|---------------------|----------------------|----------------------|-----------------------------|

**8) What are the school's admission criteria? 9 RESPONSES**

|  |   |   |  |
|--|---|---|--|
| 1. Deafness as primary disability<br>7 77.8% | 2. % of deafness/ hearing loss<br>3 33.3%     | 3. Recommendation of social worker or physician<br>0 0% | 4. Recommendation of Local Education Agency (LEA)<br>6 66.7% |
| 5. Grades in public schools<br>0 0%          | 6. Standardized test score/evaluation<br>0 0% | Other (please specify)<br>0 0%                          |  |

# APPENDIX A

## COMPARISON TO OTHER STATES

### 9) By level, how many students are enrolled at each school? [IF YOU HAVE MORE THAN 1 SCHOOL, PLEASE LIST FOR EACH.]

|                           |                            |                               |                              |
|---------------------------|----------------------------|-------------------------------|------------------------------|
| 1. Preschool 35.7 average | 2. Elementary 57.4 average | 3. Middle School 58.1 average | 4. High School 100.4 average |
|---------------------------|----------------------------|-------------------------------|------------------------------|

### 10) What is the student/teacher ratio for each level? [IF YOU HAVE MORE THAN 1 SCHOOL, PLEASE LIST FOR EACH.]

|                            |                             |                              |                              |
|----------------------------|-----------------------------|------------------------------|------------------------------|
| 1. Preschool 5.4:1 average | 2. Elementary 6.2:1 average | 3. Middle School 7:1 average | 4. High School 7.6:1 average |
|----------------------------|-----------------------------|------------------------------|------------------------------|

### 11) What percentage of identified deaf students are served by the School(s) for the Deaf? 9 RESPONSES

|                       |                        |                        |                          |
|-----------------------|------------------------|------------------------|--------------------------|
| 1. 0 – 10%<br>4 44.4% | 2. 10 – 25%<br>3 33.3% | 3. 25 – 50%<br>2 22.2% | 4. more than 50%<br>0 0% |
|-----------------------|------------------------|------------------------|--------------------------|

### 12) What percentage of identified deaf students are mainstreamed in the public schools? 9 RESPONSES

|                    |                     |                        |                             |
|--------------------|---------------------|------------------------|-----------------------------|
| 1. 0 – 10%<br>0 0% | 2. 10 – 25%<br>0 0% | 3. 25 – 50%<br>2 22.2% | 4. more than 50%<br>7 77.8% |
|--------------------|---------------------|------------------------|-----------------------------|

### 13) Are Individualized Educational Programs (IEP) required for each student? 9 RESPONSES

|                  |                                      |
|------------------|--------------------------------------|
| 1. Yes<br>9 100% | 2. No (skip to question #15)<br>0 0% |
|------------------|--------------------------------------|

### 14) What information is included in the IEP? 9 RESPONSES

|  |   |  |  |
|--|---|--|--|
| 1. Statement of student's present level of performance<br>9 100%         | 2. Statement of yearly goals and instructional objectives<br>9 100% | 3. Statement of special education and related services to be provided; student participation in regular educational programs<br>9 100% | 4. Dates services will begin and how long they will last<br>9 100% |
| 5. Transition services to be provided for students 16 and over<br>9 100% | 6. What school must do and how this will be measured<br>9 100%      | 7. Whether objectives from previous year's IEP have been met<br>8 88.9%  | 8. Other (please specify)<br>2 22.2%                               |

### 15) What are the school's graduation requirements? 9 RESPONSES

|   |  |                                |                                   |                                      |
|---|--|--------------------------------|-----------------------------------|--------------------------------------|
| 1. State's written graduation test of basic skills<br>6 66.7% | 2. Standardized course completion<br>6 66.7% | 3. GPA requirements<br>2 22.2% | 4. IEP goal attainment<br>4 44.4% | 5. Other (please specify)<br>1 11.1% |
|---|--|--------------------------------|-----------------------------------|--------------------------------------|

### 16) Are students required to take End of Grade (EOG) tests? 9 RESPONSES

|                   |   |
|-------------------|---|
| 1. Yes<br>5 55.6% | 2. No (skip to question #18)<br>4 44.4% |
|-------------------|---|

### 17) Which type End of Grad (EOG) tests are required? 5 RESPONSES

|  |   |
|--|---|
| 1. Same tests used in public schools<br>5 100% | 2. Alternative method (please specify)<br>1 11.1% |
|--|---|

### 18) What are the school's diploma options? 9 RESPONSES

|   |  |   |  |                                   |
|---|--|---|--|-----------------------------------|
| 1. Certificate of attendance<br>4 44.4% | 2. Regular high school diploma<br>9 100% | 3. Special education diploma<br>5 55.6% | 4. Vocational education diploma/certificate<br>2 22.2% | 5. Other (please specify)<br>0 0% |
|---|--|---|--|-----------------------------------|

### 19) What percentage of students received each type of diploma over the last 5 years?

|  |   |   |   |                                 |
|--|---|---|---|---------------------------------|
| 1. Certificate of attendance<br>1.2% AVERAGE | 2. Regular high school diploma<br>56% AVERAGE | 3. Special education diploma<br>41.2% AVERAGE | 4. Vocational education diploma/certificate<br>0% | 5. Other (please specify)<br>0% |
|--|---|---|---|---------------------------------|

### 20) What types of skills or certifications are required for employment? 9 RESPONSES

|                                    |                                  |                                   |  |
|------------------------------------|----------------------------------|-----------------------------------|--|
| 1. Sign language skills<br>8 88.9% | 2. State certification<br>9 100% | 3. National certification<br>0 0% | 4. Other (please specify) _____<br>1 11.1% |
|------------------------------------|----------------------------------|-----------------------------------|--|

## COMPARISON TO OTHER STATES

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### 21) Can employees be hired who do not possess these skills? 8 RESPONSES

|        |                            |  |
|--------|----------------------------|--|
| 1. Yes | 2. No (go to question #23) |  |
| 4 50%  | 4 50%                      |  |

### 22) What is the time frame for obtaining the required skills? 7 RESPONSES

|                             |                |                |                      |
|-----------------------------|----------------|----------------|----------------------|
| 1. first year of employment | 2. 1 – 2 years | 3. 2 – 4 years | 4. more than 4 years |
| 4 57.1%                     | 1 14.3%        | 1 14.3%        | 1 14.3%              |

### 23) Are background checks required on all new employees: 9 RESPONSES

|        |                            |  |
|--------|----------------------------|--|
| 1. Yes | 2. No (go to question #25) |  |
| 9 100% | 0 0%                       |  |

### 24) What types of check are required? 9 RESPONSES

|                           |                             |                            |                           |
|---------------------------|-----------------------------|----------------------------|---------------------------|
| 1. State criminal records | 2. Federal criminal records | 3. County criminal records | 4. Other (please specify) |
| 7 77.8%                   | 6 66.7%                     | 1 11.1%                    | 2 22.2%                   |

### 25) Briefly state the mission of your state's School(s) for the Deaf

### 26) Briefly describe the organizational structure for each school [INCLUDE A COPY OF THE ORGANIZATIONAL CHART(S)].

## COMPARISON TO OTHER STATES

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### CONSOLIDATION OF CONSULTANTS' REPORTS

A review of available literature in the area of deaf education confirms that no one teaching/communication method has been shown superior to all others. However, some different communication methods<sup>11</sup> currently in use are:

- The **auditory-oral approach** is a method in which children learn to use their residual hearing, in combination with contextual cues (speechreading) to understand and use spoken language. The goal is to give the deaf individual the necessary spoken language skills to be mainstreamed educationally and to function independently in the hearing world.
- The **auditory-verbal approach** is a method that emphasizes using residual hearing in order to learn spoken communication. Key components are early identification and immediate fitting with appropriate amplification. Proper audiological management and specialized training allows access to speech through listening. At times, the therapist may cover his or her mouth to eliminate the possibility of lip-reading. This approach is commonly used with children who have received cochlear implants as well as those wearing hearing aids.
- The **bilingual approach** is a method in which children learn visually through their unimpaired visual channel that, according to some educators, is more efficient than through impaired auditory pathways. It incorporates the use of American Sign Language (ASL) as the primary language of a child and English is taught as a second language. Teachers and parents must be proficient in ASL and the environment should be visually accessible (visual alerting systems, TTYs, captions, and interpreter) to support the student.
- The **cued speech approach** is a method that is used to visually represent the sounds of the English language. It is a manual augment to auditory/oral/speechreading to make spoken English visible. As such, it is really closer to an oral than manual approach. It is used to help distinguish between different sounds that look similar on the lips and to make speechreading easier. Some cued-speech children are mainstreamed with help from cued-speech transliterators (interpreters).
- The **total communication approach** is a method that uses a combination of auditory and visual approaches. Typically, children are encouraged to use simultaneous communication, speaking and signing at the same time. Utilizing this, according to some, limits the child's language experience since they are never exposed to complex English or complex ASL.

As the audit progressed, the State Auditor realized that because of the specialized nature of the services offered by North Carolina's Schools for the Deaf, it was desirable to hire consultants to assist us. The consultants were asked to review schools for the deaf in other states to give us a point of comparison for what North Carolina is doing. The consultants hired were:

- **Sharon Baker, Ed.D.**, who is a faculty member at the University of Tulsa. Some of Dr. Baker's prior experience includes employment at the Oklahoma School for the Deaf as an outreach consultant and South Carolina School for the Deaf and Blind as a special assistant to the president. Among her accomplishments are: Teaching Certificate; National Council on Education of the Deaf Certification; Outstanding Educator of the Deaf; and Sign Language Communication Proficiency. She has several professional publications, technical reports and presentations on different aspects of deafness from teaching to parent perspectives.
- **Joyce Buckler, Ed.D.**, who is a faculty member at the Fontbonne College in St. Louis, Missouri. Some of Dr. Buckler's prior experience includes teaching, supervision, and administration at St. Joseph

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<sup>11</sup> Choices In Deafness, Sue Schwartz, Ph.D. and The Deaf Education Option Web, Cindy Dedert.

## COMPARISON TO OTHER STATES

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Institute for the Deaf. Among her accomplishments are: Teaching Certificate; National Council on Education of the Deaf Certification; Clinical Competence in Audiology; and Co-founder and Chairperson of the International Council of Private/Independent Schools Providing Auditory/Oral Education for Hearing-Impaired Children. Her professional publications and presentations are mainly in the area of auditory-oral education.

- **Reginald Redding, Ph.D.**, who is an administrator and faculty member at Gallaudet University. Some of Dr. Redding's prior experience includes employment as Assistant Vice President of Rochester Institute of Technology, Assistant Superintendent for Educational Support Services at Lexington School for the Deaf, and Assistant Superintendent for Curriculum and Instruction at the Minnesota State Academy for the Deaf. Among his accomplishments are: Teaching Certificate; National Council on Education of the Deaf Certification; and Outstanding Young Men of America. He has several professional publications and presentations, most in the area of deaf/hard of hearing individuals with diverse racial and ethnic backgrounds.

The State Auditor asked the Consultants to review three broad areas of operations in other states. Specific questions asked of the Consultants were:

- 1) Educational Issues:
  - a) Which teaching method offers deaf students the most benefits?
  - b) Which teaching method is the most progressive?
  - c) What are the "best practices" in other states?
  - d) Is there a "standard course of study" for each of the different teaching methods?
  - e) What post-graduate services are offered by schools for the deaf in other states?
  - f) What certifications are other states requiring for teachers and other staff at schools for the deaf?
- 2) Health and Safety Issues:
  - a) Are there national health and safety standards for schools for the deaf?
  - b) Is there a national accrediting body for special schools of this type?
  - c) What type of incident reporting system do other states have?
  - d) What procedures do other states use to check backgrounds for staff and are there any national standards to follow?
- 3) Compliance Issues:
  - a) How does the Americans with Disabilities Act affect schools for the deaf?
  - b) Are there specific requirements that apply to schools for the deaf?

## COMPARISON TO OTHER STATES

The Consultants gathered information from 17 states and the District of Columbia. Table 13 lists the states contacted. Table 14, page 78, provides additional data regarding teaching methods, enrollment, costs, mainstreamed students, postgraduate studies, and teacher/staff certification for state residential, private and public schools for each of the states. Of the 17 states reviewed, three states have two state residential schools for the deaf and 14 states have one state residential school for the deaf. All of the states have numerous public school programs and there are 17 private schools in the states reviewed. Of the students attending state residential schools, approximately 22% of deaf/hard of hearing students in the states contacted are mainstreamed either part or full time into public schools. Enrollment in these state residential schools for the deaf ranges from 60 to 440 students.

| TABLE 13<br>CONSULTANT STATE ASSIGNMENTS |           |             |             |
|--|-----------|-------------|-------------|
| State                                    | Dr. Baker | Dr. Buckler | Dr. Redding |
| Arizona                                  | X         |             |             |
| California                               |           | X           |             |
| Colorado                                 | X         |             |             |
| District of Columbia                     |           |             | X           |
| Florida                                  |           | X           |             |
| Georgia                                  |           |             | X           |
| Illinois                                 |           | X           |             |
| Indiana                                  |           | X           |             |
| Kansas                                   | X         |             |             |
| Maryland                                 |           |             | X           |
| Minnesota                                |           |             | X           |
| Missouri                                 |           | X           |             |
| New York                                 |           |             | X           |
| Oklahoma                                 | X         |             |             |
| Pennsylvania                             |           |             | X           |
| South Carolina                           | X         |             |             |
| Texas                                    | X         |             |             |
| Virginia                                 |           |             | X           |

As shown in Table 14, different communication/teaching methods exist for educating deaf and hard of hearing students in these states. All three consultants agreed there is no single approach that is most beneficial to all deaf and hard of hearing students. Depending on the severity of hearing loss and at what age the loss occurred, some teaching methods might be more beneficial for one student than another. Therefore, our consultants did not recommend one single method over all others. Below, we summarize each Consultant's opinions and recommendations.

|                            |
|----------------------------|
| <b>Educational Issues:</b> |
|----------------------------|

*The most beneficial teaching methods:* All the Consultants agree there is no one approach for determining the best teaching/communication method that will offer the most benefit to all deaf and hard of hearing children. They also agree that early exposure to an accessible language is critical to later literacy development. However, the following opinions were rendered:

- **Dr. Baker:** Bilingual approach. This approach teaches American Sign Language as a first language and English as a second language. For this approach to be successful, teachers, staff and parents must be proficient language models for children. In addition, parents must learn to communicate in this language.
- **Dr. Buckler:** Auditory-oral approach. The goal of the auditory-oral approach is facilitating the development of spoken language through listening in order to prepare students to mainstream with their

## COMPARISON TO OTHER STATES

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normally hearing peers. Curricula in such programs is that of the regular school systems providing the children with the concepts and information being developed by their peers. In the auditory-oral approach, it is necessary to employ qualified auditory-oral teachers/supervisors and to provide students with a high level auditory environment as well as appropriate individual and group amplification.

- **Dr. Redding:** Bilingual approach. Current practice indicates that the use of manual communication does in fact further the educational, social, and emotional development of deaf children and youth.

### *The most progressive teaching methods.*

- **Dr. Baker:** *Bilingual approach.* In this decade, the bilingual/bicultural philosophy of teaching deaf students has come to the forefront. This method utilizes American Sign Language (ASL) as the first language for deaf children with English either developed simultaneously or as a second language. Because of the aspect of a shared language, a distinct culture exists among those who sign ASL. The bilingual/bicultural philosophy is based on a growing body of research related to English as a second language, research on brain-based education, research conducted on deaf children with deaf parents, and from longitudinal studies of bilingual/bicultural programs in Scandinavia. The bilingual/bicultural philosophy is founded on the premise that deaf children learn visually through their unimpaired visual channel more efficiently than through impaired auditory pathways. The most efficient visual language for deaf students is ASL. It is through learning ASL that the brain develops the plasticity and connections upon which a second language (English) is learned. English is taught through print in written form. This philosophy recognizes that a cultural need of deaf children is a barrier free environment where everyone signs and where teachers employ strategies that incorporate visual print. The environment should be visually accessible; therefore, visual alerting systems, TTYs, captions, computers for email and Internet access, and interpreters when necessary, create a communication rich environment. Last, there are deaf staff who are role models for the students. Oral/aural, cued speech, and auditory-verbal classrooms most often do not have deaf staff because the nature of the method precludes their involvement. The Star Schools Project-*Critical Pedagogy in Deaf Education: Bilingual Methodology and Staff Development* is currently underway at several schools involved in this study. Although longitudinal data from this research is currently not available, preliminary results indicate positive outcomes.
- **Dr. Buckler:** *Auditory-oral approach.* Despite the fact that extensive research has not been carried out on large numbers of deaf and hard of hearing students which possibly would indicate the most progressive methodology, a study done by Geers and Moog in 1987 on 100 adolescents who had been educated in the auditory-oral approach and a companion study carried out by the Research Institute of Gallaudet University with 60 deaf adolescents of deaf parents and 60 with hearing parents, clearly shows that auditory-oral adolescents had achieved significantly higher levels of literacy. This, in addition, to the successful academic mainstreaming of profoundly deaf children, with hearing aids and cochlear implants, is the basis for many educators of deaf and hard of hearing students adopting the auditory-oral approach.
- **Dr. Redding:** *Bilingual approach.* The majority of deaf children are not able to utilize their residual hearing to aid with their acquisition of language in the same way as their hearing counterparts. It has become a necessity to utilize a natural approach to acquire information in a visual manner. In observing the bilingual education approach, it appears that deaf children do better when taught in American Sign Language in their early educational careers and then English is introduced as a written language. There are studies in the literatures that support this approach as well as pilot programs that currently implement bilingual education. Bilingual programs use ASL and written English with the goal of using students' knowledge of their first language to help them learn to use the second. It was reported in "Unlocking the Curriculum" that various systems for coding English and Cued Speech have been less than adequate. Other studies using ASL in the classroom proved effective in improving children's English skills.

## COMPARISON TO OTHER STATES

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Teaching methods used at the state residential schools for the deaf included in the review:

- Eight use Bilingual approach.
- Five use Total Communication approach.
- Four use ASL with Speech approach.
- One uses ASL.

*Best practices at other residential schools for the deaf.*

Dr. Baker:

1. Outreach Services: Increasing services to local school districts including assessments of deaf and hard of hearing students who are mainstreamed.
2. Educational Interpreter Proficiency Assessment. Requiring educational interpreters to be certified.
3. Distance Learning/Videoconferencing: Videoconferencing classes from one campus to another.
4. Local Wide Area Networks: Improving staff communication and information sharing.
5. Mental Health Collaborative Projects: Sharing staff at the residential school with public schools.
6. Regionalization of Programs: Establishing regional preschool programs and regional day school programs.
7. Transition Services: The development of independent living skills, development of job and vocational skills, career exploration activities, and preparation for exiting the residential school and entering the work force or continuing post-secondary educational programs.
8. Tracking Graduates: Conducting graduate follow-up studies.
9. Staff Development: Providing staff the means to become proficient in American Sign Language.
10. Specialized programs for deaf students who have serious behavior disorders.
11. Discipline programs: Using a proactive approach regarding misbehavior not as an opportunity to punish, but as an opportunity to teach.
12. Innovative Research: The Star School's Project--*Critical Pedagogy in Deaf Education: Bilingual Methodology and Staff Development*.
13. Post-secondary programs for students who have graduated from a K-12 program.

Dr. Buckler:

1. A variety of appropriate and well-maintained auditory equipment recommended by knowledgeable school audiologists.
2. Assistance provided to mainstreamed personnel for appropriate use of such auditory equipment and in strategies for helping the hearing impaired child be a successful mainstream student.
3. Specific, organized and developmental curricula in centers/programs for ensuring that hearing-impaired students, both those using hearing aids and cochlear implants, are progressing through the various stages of listening.
4. Specific, organized, and developmental curricula used in regular education, in all areas of academics as well as objective testing tools with normally hearing students.
5. Education and support of parent decisions concerning their child receiving a cochlear implant.
6. Use of spoken language in all interactions with hearing-impaired students to assist them in their development of spoken language and in the development of listening skills.
7. Organized developmental curricula for assisting hearing-impaired students in developing pleasant voice quality and understandable speech.
8. Encouragement and specific plans for students to spend time in reading for leisure as well as assigned reading.
9. Where necessary, employ Spanish speaking staff members for Hispanic students and their families.
10. Faculty with specialized training for serving the educational, psychological, and emotional demands of students with problems in addition to a hearing impairment.
11. Special programs and/or specially trained teachers for students with learning and behavior problems.

## COMPARISON TO OTHER STATES

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Dr. Redding:

1. Literacy Focus. In an effort to increase children's ability to read which serves as the foundation of all future learning, schools are attempting to expand their existing literacy curriculum. The Shared Reading Program is an example of this contemporary effort.
2. Vocational Services/Transition. A series of programs available to youths 14 years and beyond include adults in the community to facilitate entry into the working world through supported employment programs. Examples of such programs include job coaching, shadowing programs, and adult basic education in business writing and arithmetic.
3. Mental Health Services. Provisions of counseling and therapy to young adults as they transition to the working world.
4. Multicultural Focus. Specialized programming to address multicultural needs of students of color. Examples of such programs incorporate multicultural aspects in curriculum and teaching to show a commitment to a diverse workforce among administrators, teachers, and other staff as role models.
5. Assessment Programs. In addition to those required by IEP, appropriate assessments are developed to ensure proper monitoring of students' learning.
6. Mainstreamed Programs. For those schools who have students mainstreamed to the local public schools, providing an individualized education program is challenging and not limited to academics but also includes the arts and athletic programs.
7. Staff Development. There is a strong effort to support teachers and staff in managing their students and their individual needs in their classroom.
8. Instruction through Direct Communication. Use of manual communication and/or American Sign Language at all times promotes communication accessibility to all children.
9. Leadership/Student Development. Students get a bonus in learning additional living skills by being boarding students. Various leadership/student development skills are acquired through direct participation in program activities and interaction such as sports, student organizations, and debates.

Standard Course of Studies for different teaching methods: *All Consultants agreed that no standard course of studies exist for each of the different teaching methods. Instead, state schools for the deaf attempt to utilize their state-required standard course of study, making adaptations as appropriate to meet the needs of students who are deaf or hard of hearing. In addition to the standard course of studies, the schools have specialized curricula guidelines for language development that is in line with the methodology used at the schools (speech, auditory development, and spoken/signed language).*

Post-Graduate Services offered by schools for the deaf: *Two schools provide post-secondary programs on their campuses for students who have earned a high school diploma. Post-secondary programs may include on campus vocational/technical training and/or collaborative programs with community colleges and area vocational/technical schools. Most state schools have transitional living and independent living programs for any student who has completed the school's program, allowing them to live on campus while attending college.*

Teacher and other staff certifications: *All teachers must be certified within their state. Three states require dual certification in deaf education and in the area of instruction. No state requires teachers or staff to be certified by the National Council on Education of the Deaf. However, one state provides additional compensation for this certification.*

## COMPARISON TO OTHER STATES

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### Health and Safety Issues:

*National health and safety standards:* *There are no national standard requirements specifically for schools for the deaf.*

*National accrediting bodies:* The Conference of Educational Administrators of Schools and Programs for the Deaf (CEASD) provides national accreditation to schools meeting their standards. CEASD examines administration, school programs, media services, group living, outreach/diagnostic, medical services, support services, community and parent relationships, courses of study, learning materials, and the needs and interests of students.

*Incident reporting system:* All schools contacted have some type of incident policies and reporting system. These systems are manual or computer based and can be used to track critical information and ensure that all processes are handled appropriately. Incidents are reported to various points of contact in the school, such as the director of the school's mental health team, principal, or security director. In addition, incidents are reported immediately to the state agency involved in child protection. When appropriate, local law enforcement is notified by the executive officer, as well as the State Department of Education, the school's attorney, and board president. Here again, no one method of handling incident reporting emerged as the most effective.

*National standards for and types of background checks for staff:* There are no national standards for background checks specifically for staff at schools for the deaf. Criminal background and child abuse checks are conducted on all staff in all programs reviewed. Only one state of those reviewed conducts reoccurring criminal checks after employment.

### Compliance Issues:

The Americans With Disabilities Act's (ADA) affect on schools for the deaf: *All ADA requirements apply to the schools for the deaf. Examples of how other states have complied with ADA requirements are:*

- Physical access by eliminating barriers (installing elevators)
- Visual Alerting systems
- TTY
- TTY accessible voice-mail system
- Captioning Television
- Direct communication access
- Assistive Listening Devices
- Interpreters

*Specific ADA requirements for schools for the deaf:* There are no specific ADA requirements that apply only to the schools for the deaf.

## COMPARISON TO OTHER STATES

**TABLE 14**  
**SUMMARY OF DATA COLLECTED FROM OTHER STATES**

| Schools and Programs  | Number and Type of Schools  | Method of Education | Enrollment       | Costs                              | Percent of Students Mainstreamed  | Post Graduate Studies   | Required Teacher/Staff Certification  |
|---|---|---------------------|------------------|------------------------------------|---|---|---|
| <b>ARIZONA</b>  |   |                     |                  |                                    |   |   |   |
| <p>Arizona State Schools for the Deaf and the Blind (ASDB)</p> <p>ASDB is a state agency that oversees all educational and outreach programs for children who are deaf or blind in the state including:</p> <p>The Residential School for the Deaf and the Blind and Agency Administration, Tucson</p> <p>Phoenix Regional Day School</p> <p>Regional Cooperatives</p> <ul style="list-style-type: none"> <li>• Desert Valleys Regional Cooperative, Phoenix</li> <li>• North Central Regional Cooperative, Flagstaff</li> <li>• Southwest Regional Cooperative, Yuma</li> <li>• Southeast Regional Cooperative, Tucson</li> </ul> <p>Centers for Hearing Impaired Children</p> <ul style="list-style-type: none"> <li>• Phoenix</li> <li>• Tucson</li> </ul> <p>Parent Outreach Services</p> <ul style="list-style-type: none"> <li>• Phoenix</li> <li>• Tucson</li> </ul> <p>Statewide Programs</p> <ul style="list-style-type: none"> <li>• Early Childhood Education and Family Services</li> <li>• Arizona Deaf-Blind Project</li> </ul> | <p>1-Residential school</p> <p>1-Regional day school</p> <p>5-Regional cooperatives</p> | Total Communication | 2,000 state-wide | <p>Agency Budget: \$25,408,000</p> | <p>Approximately 28%</p> <p>550 students are mainstreamed, enrolled in the regional cooperatives and the Phoenix Day School program</p> | <p>Students who have graduated from ASDB are allowed to remain on campus as residential students while attending a community college or training program beyond high school if it is prescribed in the IEP</p> <p>Vocational rehabilitation services begin at age 22.</p> | <p>HS teachers – dual certificate in subject area and deaf education</p> <p>Elem. Teachers – deaf education certificate only</p> <p>Early Intervention teachers – dual early childhood &amp; disability</p> <p>CED (Council on Education of the Deaf) not required.</p> |

## COMPARISON TO OTHER STATES

**TABLE 14 (CONTINUED)**  
**SUMMARY OF DATA COLLECTED FROM OTHER STATES**

| Schools and Programs  | Number and Type of Schools | Method of Education                                  | Enrollment        | Costs                         | Percent of Students Mainstreamed                     | Post Graduate Studies  | Required Teacher/Staff Certification  |
|---|----------------------------|--|-------------------|-------------------------------|--|--|---|
| <b>COLORADO</b>   |                            |  |                   |                               |  |  |   |
| <p>Colorado School for the Deaf and the Blind (CSDB), Colorado Springs</p> <p>CSDB is located organizationally within the Colorado Department of Education. The Superintendent serves as an Assistant Commissioner within the department.</p> <p>Outreach Programs and Activities:</p> <ul style="list-style-type: none"> <li>• Technical assistance to LEAs</li> <li>• Statewide assessment of students</li> <li>• Equipment lending center</li> <li>• Educational interpreter assessment and training</li> <li>• Annual conference on deaf education</li> <li>• Online library of information related to deafness</li> <li>• Parent group - Hands and Voices</li> <li>• Mental health collaborative project with Denver Public Schools</li> </ul> <p>CSDB is beginning a study to determine feasibility of regional programs.</p> | 1-Residential school       | Bilingual American Sign Language and written English | 172 deaf students | Annual Budget:<br>\$8,916,260 | Approximately 8%<br><br>14 students are mainstreamed | Students who have graduated from CSDB are allowed to remain on campus as residential students while attending the Deaf Prep Program at Pikes Peak Community College. | <p>All teachers are required to hold a Colorado license to teach deaf children.</p> <p>CED is not required.</p> |

## COMPARISON TO OTHER STATES

**TABLE 14 (CONTINUED)**  
**SUMMARY OF DATA COLLECTED FROM OTHER STATES**

| Schools and Programs  | Number and Type of Schools  | Method of Education  | Enrollment   | Costs                                   | Percent of Students Mainstreamed                            | Post Graduate Studies   | Required Teacher/Staff Certification   |
|---|---|--|--|---|---|---|--|
| <b>KANSAS</b>   |   |  |  |   |   |   |  |
| <p>Kansas School for the Deaf (KSD), Olathe</p> <p>KSD is located organizationally within the Kansas Department of Education</p> <p>Outreach Services:</p> <ul style="list-style-type: none"> <li>• Outreach assessment team</li> <li>• FM amplification loan program for students statewide. FM units are delivered and maintained in proper working order.</li> <li>• Full-time Outreach Coordinator that provides resources, technical assistance, and inservice training to public schools throughout the state.</li> </ul>                 | 1-Residential school  | <p>Bilingual/Bicultural</p> <p>ASL and written English</p> | 165  | <p>Annual Budget</p> <p>\$7,464,951</p> | <p>Approximately 6%</p> <p>10 students are mainstreamed</p> | None  | <p>If teachers were trained in Kansas, they must hold a dual certificate. In their training they receive a standard subject/area certificate before they receive deaf education. Out of state applicants often receive a standard certificate without the subject area certificate because of reciprocity agreements with other states. CED is not required.</p> |
| <b>OKLAHOMA</b>   |   |  |  |   |   |   |  |
| <p>Oklahoma School for the Deaf (OSD), Sulphur</p> <p>OSD is located organizationally within the Oklahoma Department of Rehabilitation Services</p> <p>Outreach Services:</p> <ul style="list-style-type: none"> <li>• Technical Assistance to LEAs</li> <li>• Psycho-Educational Evaluation and Consultation</li> <li>• Audiological Evaluation</li> <li>• Vocational Evaluation</li> <li>• Parent Education</li> <li>• Parent Lending Library</li> <li>• Sign Language Classes for parents, professional workers and the community</li> </ul> | <p>1-Residential school</p> <p>1-Regional Day School</p> <p>4-Regional Satellite Preschools</p> | Total Communication  | 216 students including both on campus and satellite programs | <p>Annual Budget</p> <p>\$7,000,000</p> | <p>Approximately 2%</p> <p>5 students are mainstreamed</p>  | <p>Transitional Living Center (in Oklahoma City)</p> <p>The Transitional Living Center is a 2 year program that focuses on developing independent living skills in all areas of life. Students transition from a dorm-like residential program to on-campus apartments and then eventually into apartments in their community. The center also provides job development and placement, job coaching, and employer orientation and training.</p> | <p>Teachers are required to hold an Oklahoma standard certificate in Deaf and Hard of Hearing, additional subject area certification is preferred.</p> <p>CED certification is not required, but is encouraged by paying \$100/year for teachers who hold national certification.</p>  |

## COMPARISON TO OTHER STATES

**TABLE 14 (CONTINUED)**  
**SUMMARY OF DATA COLLECTED FROM OTHER STATES**

| Schools and Programs   | Number and Type of Schools   | Method of Education                                | Enrollment  | Costs  | Percent of Students Mainstreamed                             | Post Graduate Studies  | Required Teacher/Staff Certification  |
|--|--|--|---|--|--|--|---|
| <b>SOUTH CAROLINA</b>  |  |  |   |  |  |  |   |
| <p>South Carolina School for the Deaf and the Blind (SCSDB), Spartanburg</p> <p>SCSDB is a state agency.</p> <p>Six regional outreach centers providing:</p> <ul style="list-style-type: none"> <li>• Information and referral</li> <li>• Audiological assessments</li> <li>• Educational evaluations</li> <li>• Counseling</li> <li>• Technical assistance to LEAs</li> <li>• Interpreter training and referral</li> <li>• Early Intervention program</li> <li>• Sign language evaluation</li> <li>• Summer programs</li> </ul> | <p>1-Residential school for deaf and blind students</p> <p>6-Regional outreach centers</p> | <p>Bilingual/Bicultural</p> <p>ASL and English</p> | <p>200 deaf students</p> <p>Other students on campus include:</p> <p>Blind, Multi-handi-capped, and Post-Secondary Students</p> | <p>Agency Budget: \$20,800,000</p> <p>(This is the appropriation for the school for the deaf, school for the blind, school for the multi-handicapped residential programs and outreach services.)</p> <p>Outreach's budget is \$2.5 million.</p> | <p>Approximately 10%</p> <p>21 students are mainstreamed</p> | <p>SCSDB has an extensive postsecondary training program for students who have completed a secondary program at SCSDB or a public LEA in SC. There are no age limitations. The program includes:</p> <ul style="list-style-type: none"> <li>• Career Development &amp; Placement</li> <li>• On campus adult independent living center</li> <li>• Cooperative program with Spartanburg Technical College</li> <li>• On campus Industrial Skills Development Center</li> </ul> | <p>Teachers are required to hold a standard deaf education certificate. At the high school level, they require dual certification although that is not always possible. CED certification is not required; however, it is recognized as a valuable asset.</p> |

## COMPARISON TO OTHER STATES

**TABLE 14 (CONTINUED)**  
**SUMMARY OF DATA COLLECTED FROM OTHER STATES**

| Schools and Programs  | Number and Type of Schools             | Method of Education  | Enrollment | Costs                          | Percent of Students Mainstreamed                            | Post Graduate Studies  | Required Teacher/Staff Certification   |
|---|--|----------------------|------------|--------------------------------|---|--|--|
| <b>TEXAS</b>  |  |                      |            |                                |   |  |  |
| <p>Texas School for the Deaf, Austin</p> <p>The Texas School for the Deaf is a state agency.</p> <p>Educational Resources Center on Deafness (ERCOD)</p> <p>Outreach Services:</p> <ul style="list-style-type: none"> <li>• Information and referral</li> <li>• Consultation and services to students and families</li> <li>• Audiological assessments</li> <li>• Educational evaluations</li> <li>• Technical assistance to professional service providers</li> <li>• Early Intervention program</li> <li>• Summer programs</li> </ul> | 1-Residential school for deaf students | Bilingual/Bicultural | 458        | Agency Budget:<br>\$17,000,000 | <p>Approximately 2%</p> <p>10 students are mainstreamed</p> | <p>TSD's Transitional Living Center is designed for students aged 18-21 who have graduated from a public school program, but need additional training before they can live independently and seek either employment or higher education. Transitional students may receive instruction for up to two years. There is a strong independent living skills and vocational training in the Career-Technology Center.</p> | <p>Teachers are required to hold a standard certificate (K-12) to teach deaf and hard of hearing students. No dual certificates are required. Certification flexibility is allowed for teachers of children with multiple disabilities and allow a special education endorsement for severe and profound. In the Career-Technology Department, vocational education certificates are allowed. Parent-Infant (P-I) teachers are required to hold a deaf education certificate with P-I endorsement. CED certification not required.</p> |
| <b>GEORGIA</b>  |  |                      |            |                                |   |  |  |
| Atlanta Area School for the deaf  | Day School K-12                        | Bilingual Education  | 170        | Not Available                  | None  | None   | State Certification  |
| Georgia School for the Deaf   | Residential school                     | Bilingual Education  | 109        | Not Available                  | None  | None   | State Certification  |

## COMPARISON TO OTHER STATES

**TABLE 14 (CONTINUED)**  
**SUMMARY OF DATA COLLECTED FROM OTHER STATES**

| TABLE 14 (CONTINUED)                           |                            |   |             |  |   |                       |  |
|--|----------------------------|---|-------------|--|---|-----------------------|--|
| SUMMARY OF DATA COLLECTED FROM OTHER STATES    |                            |   |             |  |   |                       |  |
| Schools and Programs                           | Number and Type of Schools | Method of Education                               | Enroll-ment | Costs  | Percent of Students Mainstreamed  | Post Graduate Studies | Required Teacher/Staff Certification           |
| MARYLAND                                       |                            |   |             |  |   |                       |  |
| Maryland School for the Deaf: Frederick Campus | Residential School         | Bilingual Education                               | 440         | Agency Budget \$16,428,000 (This includes both campuses)   | A small amount  | None                  | State Certification                            |
| Columbia Campus                                | Residential school         | Bilingual Education                               | 110         |  | None  | State Certification   |  |
| MINNESOTA                                      |                            |   |             |  |   |                       |  |
| Minnesota State Academy for the Deaf           | Residential School         | Bilingual-Bicultural                              | 145         | Agency Budget \$10,039,000 (This includes funds for both the day and residential deaf schools and Minnesota State Academy for the Blind) | About 10% into the local public school for part or full day of the program and live on campus | None                  | State Licensure                                |
| Metro Deaf School                              | Day School                 | Bilingual-Bicultural                              | 44          |  | None  | None                  | Exempted: Charter School                       |
| PENNSYLVANIA                                   |                            |   |             |  |   |                       |  |
| Pennsylvania School for the Deaf               | Day School K-8             | Not called Bi-Bi school but use Bi-Bi foundations | 175         | \$5.9 million  | Yes   | None                  | Teachers: State Certification for all in state |
| Western Pennsylvania School for the Deaf       | Residential School         | Total Communication ASL/ Sign with Speech         | 215         | \$9.8 million  | None  | Yes                   |  |
| Scranton State School for the Deaf             | Residential School         | Total Communication                               | 125         | Not Available  | None  | None                  |  |

## COMPARISON TO OTHER STATES

**TABLE 14 (CONTINUED)**  
**SUMMARY OF DATA COLLECTED FROM OTHER STATES**

| Schools and Programs                       | Number and Type of Schools | Method of Education                       | Enrollment | Costs         | Percent of Students Mainstreamed | Post Graduate Studies                      | Required Teacher/Staff Certification  |
|--|----------------------------|---|------------|---------------|----------------------------------|--|---|
| <b>NEW YORK</b>                            |                            |   |            |               |                                  |  |   |
| Lexington School for the Deaf              | Day School                 | Sign/Speak English<br>Total Communication | 410        | Not Available | None                             | Vocational Services & Mental Health Clinic | SCPI Evaluation (only at White Plains)<br>Teachers: State Certification for all in state<br>Administrators: State Certification |
| New York School for the Deaf, White Plains | Residential School         | Total Communication                       | 200        | Not Available | None                             | None                                       |   |
| St. Joseph School for the Deaf             | Day School<br>K-8 Grades   | Bilingual-Bicultural                      | 140        | Not Available | None                             | None                                       |   |
| Clearly School for the Deaf                | Day School                 | Bilingual-Bicultural                      | 5          | Not Available | None                             | None                                       |   |
| JHS 47 School for the Deaf                 | Public School              | Bilingual-Bicultural                      | 300        | Not Available | None                             | Yes: CARE Program                          |   |
| Rochester School for the Deaf              | Residential/<br>Day School | Total Communication                       | 225        | Not Available | None                             | Yes  |   |
| New York State School for the Deaf         | State School               | Total Communication                       | 115        | Not Available | None                             | None                                       |   |
| St. Francis de Sales School for the Deaf   | Day School<br>1-8 Grades   | Total Communication                       | 150        | Not Available | None                             | None                                       |   |
| St. Mary's School for the Deaf             | Residential School         | Sign with Spoken English                  | 131        | Not Available | None                             | Yes  |   |
| Millneck Manor School for the Deaf         | Day                        | Simultaneous Manual Communication         | 98         | Not Available | Yes                              | Yes  |   |

## COMPARISON TO OTHER STATES

**TABLE 14 (CONTINUED)**  
**SUMMARY OF DATA COLLECTED FROM OTHER STATES**

| Schools and Programs                         | Number and Type of Schools | Method of Education        | Enrollment    | Costs         | Percent of Students Mainstreamed | Post Graduate Studies | Required Teacher/Staff Certification   |
|--|----------------------------|----------------------------|---------------|---------------|----------------------------------|-----------------------|--|
| VIRGINIA                                     |                            |                            |               |               |                                  |                       |  |
| Fairfax County Public Schools                | Public School              | Full Continuum of Approach | 180           |               | Yes (100%)                       | None                  | Teachers: State Certification for all in state   |
| Virginia School for the Deaf: Hampton Campus | Residential School         | Sign w/ Speech             | 60            | Not Available | Yes                              | Yes                   |  |
| Staunton Campus                              | Residential School         | Sign w/ Speech             | 135           | Not Available | Yes                              | None                  |  |
| CALIFORNIA                                   |                            |                            |               |               |                                  |                       |  |
| State Schools                                | Day and Residential        | ASL & Signs w/Speech       | 509           | \$35,000      | Upon leaving program—75% *       | None                  | All schools/programs in California have the following requirements:<br><br>Degreed, state certified professionals,<br><br>Residential staff (CSD-Fremont) -- not certified,<br><br>Some teachers have CED certification; not required. |
| California School for the Deaf-Fremont       |                            |                            |               |               |                                  |                       |  |
| California School for the Deaf-Riverside     | Day and Residential        | ASL & Signs w/Speech       | 504           | \$35,000      | ---                              | None                  |  |
| Public Programs/Districts                    | 55 Day                     | ASL & Sign w/Speech        | 6,305         | \$13,676 **   | ---                              | None                  |  |
| Private Schools: CCHAT Center-Sacramento     | Day                        | Auditory/ Oral             | 27            | \$20,547      | 90%                              | None                  |  |
| CCHAT Center-San Diego                       | Day                        | Auditory/ Oral             | 14            | \$20,180      | 100%                             | None                  |  |
| Echo Center                                  | Day                        | Auditory/ Oral             | 16            | \$9,950       | 100%                             | None                  |  |
| J.W. Peninsula Oral School                   | Day                        | Auditory/ Oral             | 47            | \$20,000      | 100%                             | None                  |  |
| John Tracy Clinic                            | Day                        | Auditory/ Oral             | Not Available | Not Available | Not Available                    | None                  |  |
| Oralingua School for the Hearing Impaired    | Day                        | Auditory/ Oral             | 58            | \$20,000      | 85%                              | None                  |  |

## COMPARISON TO OTHER STATES

**TABLE 14 (CONTINUED)**  
**SUMMARY OF DATA COLLECTED FROM OTHER STATES**

| Schools and Programs                            | Number and Type of Schools | Method of Education                                       | Enrollment     | Costs   | Percent of Students Mainstreamed  | Post Graduate Studies | Required Teacher/Staff Certification   |
|---|----------------------------|---|----------------|---|---|-----------------------|--|
| FLORIDA   |                            |   |                |   |   |                       |  |
| State Schools:<br>Florida School for the Deaf   | 1 Day and Residential      | ASL & Signs with Speech                                   | 507            | \$18 - 80,000<br>Formula for ESE Students in Public School is used. | During enrollment:<br>Elementary – 5%<br>Middle – 10%<br>High Schl.–40%<br>Post graduation – 75-80% * | None                  | All schools/programs in Florida have the following requirements:<br>Degreed, state certified professionals,<br>Residential staff (FSD) -- not certified,<br>Some teachers have CED certification; not required |
| Public Programs/Districts                       | 20 Day                     | ASL & Signs w/Speech                                      | 2,994          | \$13,936 **   | Not Available   | None                  |  |
| Private Schools:<br>Clarke School -Jacksonville | 1 Day                      | Auditory/ Oral  | 19             | \$13,000  | 50% ***   |                       |  |
| INDIANA   |                            |   |                |   |   |                       |  |
| State Schools:<br>Indiana School for the Deaf   | 1 Day and Residential      | ASL& Total Communication                                  | 321            | \$38 – 42,000   | “A few” In 1999, of 33 grads 70% to enter post secondary programs                                     | None                  | All schools/programs in Indiana have the following requirements:<br>Degreed, state certified professionals,<br>Residential staff (ISD) – not certified,<br>Some teachers have CED certification; not required  |
| Public Programs/Districts                       | 22                         | Auditory/ oral w/signs<br>Total Com Signs w/ speech & ASL | 477            | \$16,014 **   | Not Available   | None                  |  |
| Private Schools                                 | Not Applicable             | Not Applicable  | Not Applicable | Not Applicable  | Not Applicable  | Not Applicable        |  |

# APPENDIX A

## COMPARISON TO OTHER STATES

**TABLE 14 (CONTINUED)**  
**SUMMARY OF DATA COLLECTED FROM OTHER STATES**

| TABLE 14 (CONTINUED)<br>SUMMARY OF DATA COLLECTED FROM OTHER STATES |                            |   |               |                                       |  |                       |   |
|---|----------------------------|---|---------------|---------------------------------------|--|-----------------------|---|
|   | Number and Type of Schools | Method of Education                           | Enroll-ment   | Costs                                 | Percent of Students Mainstreamed   | Post Graduate Studies | Required Teacher/Staff Certification  |
| ILLINOIS  |                            |   |               |                                       |  |                       |   |
| State Schools<br>Illinois School for the Deaf                       | 1 Day and Residential      | ASL   | 325           | \$43,539                              | 40-50% *   | None                  | All schools/programs in Illinois have the following requirements:<br>Degreed, state certified professionals;<br>State residential staff not certified, but must have a 6 mo to 1 yr. Training program, must pass tests; all state staff must pass a sign language proficiency test. Some teachers have CED certification; not required. |
| Public Schools/Districts  | 22 Day                     | ASL<br>Cued Speech<br>C/NO;<br>Signs w/speech | 4,566         | \$15,444**                            | ---  | None                  |   |
| Private School:<br>Child's Voice                                    | Day                        | Auditory/<br>Oral                             | 32            | \$17,400                              | 75%  | None                  |   |
| St. Joseph Institute for the Deaf at Carle                          | Day                        | Auditory/<br>Oral                             | 13            | \$15-16,000                           | 75%  | None                  |   |
| Holy Trinity Day School for the Deaf                                | Day                        | O-C/NO  | 27            | Grades 1-8<br>\$1,900<br>P-K: \$2,200 | 50%  | None                  |   |
| MISSOURI  |                            |   |               |                                       |  |                       |   |
| State Schools<br>Missouri School for the Deaf                       | 1 Day and Residential      | ASL & Signs with Speech                       | 136           | \$30,000                              | Post-high school*<br>(Exact data not available.)                                       | None                  | All schools/programs in Missouri have the following requirements:<br><br>Degreed, state certified professionals;<br><br>State residential staff not certified; all state staff must pass a sign language proficiency test.<br><br>Some teachers have CED certification; not required.   |
| Public Schools  | 17 Day                     | ASL & Signs w/ Speech;<br>TC.                 | 490           | \$13,790 **                           | Not Available  | None                  |   |
| Special School District of St. Louis County                         | 1 Day                      | Auditory-oral;<br>C/NO                        | Not Available | \$13,117**                            | Total 80%; SSD has an age range of students from 3 – 21; this % includes all students. | None                  |   |

## SUMMARY OF DATA COLLECTED FROM OTHER STATES

|   | Number and<br>Schools | Education  | ment                               |                                       | Percent of<br>Mainstreamed       | Studies | Certification |
|---|-----------------------|--|------------------------------------|---------------------------------------|----------------------------------|---------|---------------|
| <b>Private Schools:</b>   |                       |  |                                    |                                       |                                  |         |               |
| Moog Oral School  | Day/                  | Auditory-  | 75                                 |                                       |                                  |         |               |
|   |                       | Auditory-  | 41                                 | \$27,500 res.                         | program: 90%<br>Upon leaving the | None    |               |
| Louis   | Residential           | Oral   |                                    | \$12,000 day                          | Upon leaving the                 | None    |               |
| Kansas City   |                       | Auditory-  | 15                                 |                                       | Upon leaving the                 |         |               |
| <b>NORTH CAROLINA</b>   |                       |  |                                    |                                       |                                  |         |               |
| Includes 6 satellite preschools<br>the Deaf<br>Central North Carolina School for<br>Includes 6 satellite preschools   | Residential/          | Auditory-<br>Commun-<br>Sign/<br>(based on<br>needs) | (280 pre-<br>students<br>students) | FY97-1998<br>\$24,959,990<br>student) |                                  | None    |               |
| Source: American Annals of the Deaf (1999), 142(2) National Center for Education Statistics,<br>* Mainstreamed primarily to Gallaudet University, National Technical Institute for the Deaf and local community colleges.<br>Based on directives to heads of elementary and secondary educations of Missouri from Missouri's Department of Education. |                       |  |                                    |                                       |                                  |         |               |

# ***APPENDIX B***

## ***ARCHITECT'S REPORT***

*Hoskins Scott & Partners, Inc.  
Boston, Massachusetts*

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### ***Overview of Hoskins Scott and Partners, Inc.***

*Hoskins Scott & Partners, Inc. is a full service architecture, planning and interior design firm, founded in 1977. Located in Boston, Massachusetts, Hoskins Scott & Partners, Inc. provide innovative and cost effective design solutions for a variety of project types in both the public and private sector. Their experience includes projects within the healthcare, education and commercial markets with an additional mix of special projects. Professional services offered by Hoskins Scott & Partners, Inc. include master planning, site planning, feasibility studies, architectural design, life safety assessment, code compliance, and ADA compliance.*

## ***Executive Summary - North Carolina Schools for the Deaf***

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The goal of this analysis was to assess the existing physical condition of the capital facilities of the three North Carolina Schools for the Deaf: Eastern NCSD in Wilson, Central NCSD in Greensboro, and North Carolina School for the Deaf (NCSD) in Morganton. The analysis also sought to evaluate whether the schools' physical plants met the current needs of the schools' users.

The methodology for this analysis included site visits and a building-by-building inspectional tour, interviews, and a review of the scope and budgets of capital projects funded, proposed and/or underway.

The three school campuses are comprised of 843,000 gross square feet of building space, ranging in age from turn-of-the-20th century to the 1990's. There are approximately 271 residential students and 138 day students, for a total of 409 students during a typical school session.

This final report has nine findings, conclusions and recommendations, presented below:

**1. The facility infrastructure of the three-campus residential school system is grossly oversized for the current school population.**

North Carolina's three-campus system of residential schools for the deaf is at a critical turning point. With over three-quarters of a million gross square feet of aging institutional buildings accommodating fewer than 500 students (including fewer than 300 residential students) across three large campuses, the overall ratio of physical plant capacity to resident student is far too high.

The current situation presents an opportunity to reorganize the physical assets of the three schools to better meet the operational goals of the overall system and to dramatically lower the capital and operating cost liabilities for the State.

**2. Consolidation to smaller, more cost-efficient quarters could help conserve operating and capital dollars.**

Consolidation of operations to a smaller capital portfolio is a typical strategy that has been used by many large educational and health care institutions around the country which have faced similar declining enrollment/utilization patterns. Consolidation opportunities are present within each campus and among the three campuses.

**3. Compatible reuse of vacant campus buildings is possible.**

After consolidation, the State has an opportunity to reuse vacant buildings for compatible uses which add value to the ongoing operations of the schools. For example, reuse of vacant buildings by a public or private school or another publicly-funded residential program for youth would allow both the School for the Deaf and the new tenant partner to share library, communications, food service, maintenance, and physical education assets.

**4. Physical plant assets could serve as educational, programmatic and recreational resources for the greater community.**

The State school gyms, libraries, conference rooms and other assets could serve as a resource beyond their direct benefit to the on-site residential deaf and hearing community. These amenities offer many opportunities for developing programming for the non-residential deaf community, as

***Executive Summary - North Carolina Schools for the Deaf***

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well as other community educational uses. Use by external entities, local community schools and businesses could possibly generate fee revenue.

**5. Proximity to other large public institutions warrants further analysis of possible compatibility for shared services or assets.**

ENCSD and NCSD are very close to other large public institutions. This proximity suggests an analysis of opportunities for combining certain operations or purchasing functions to gain cost efficiencies. Food service, laundry, maintenance and other operations are likely candidates.

**6. A long-range, campus-wide programmatic and physical Masterplan is urgently needed for each campus, particularly at NCSD.**

To capture and organize the necessary data required to advance a strategic plan for the future of each campus, a Masterplan would be ideal. NCSD is desperately in need of such a plan.

**7. Many buildings and systems at the three campuses require a moderate amount of repair, replacement and upgrade without extensive delay.**

Not one of the three campuses has had sufficient resources to keep up with the tremendous cost of maintenance, repair and modernization required by facilities of their size. The list of necessary improvements is generally well-documented at the campus and state administrative level and is currently subject to budgetary prioritization. These improvements are much-needed and should be performed as soon as is feasible.

**8. Buildings or building portions that are vacant and "on-hold" should be protected by "mothballing".**

Thousands of square feet of building space are currently vacant or will become vacant in the near future. Pending acquisition or control by a new tenant who can bring sufficient funds for full renovation and modernization, these buildings or portions will continue to be "on-hold" and will need to be protected from the deteriorating effects of weather and vandalism. Proper "mothballing" protections are not inexpensive but are valuable insurance against potential fire, demolition and/or more extensive renovation at a later date.

***Executive Summary - North Carolina Schools for the Deaf***

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**9. Appropriate design and engineering expertise should be sought for the many smaller but persistent repair and upgrade issues.**

The State should acquire design and engineering assistance to focus on repair and upgrade issues like roofs, heating and air conditioning controls, and handicapped access improvements in a systematic campus-wide, non-piecemeal approach. Technical consultants should continue to be hired on a multi-year "house-doctor" basis to be available as needed by campus staff.

This facility analysis was performed under contract to the Office of the State Auditor, State of North Carolina as part of an overall Program Evaluation of the three North Carolina Schools for the Deaf and the related system of educational services for children who are deaf and hard of hearing.

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***SPENDING FOR STUDENTS - North Carolina Schools for the Deaf*****Proposed Capital Spending on a Per-Student Basis (Design Capacity vs. Actual Census)  
North Carolina Schools for the Deaf**

|              | <b>Design Capacity<br/>(DC)</b> | <b>Actual Census<br/>(AC) (1)</b> | <b>Recent Actual<br/>and<br/>Proposed Capital<br/>Spending (2)</b> | <b>Capital<br/>Spending/<br/>Student<br/>Design<br/>Capacity<br/>(DC)</b> | <b>Capital<br/>Spending/<br/>Student<br/>Actual<br/>Census<br/>(AC)</b> |
|--------------|---------------------------------|-----------------------------------|--|---|---|
| <b>ENCSD</b> | 210                             | 127                               | \$18,545,280   | \$88,310  | \$146,026   |
| <b>CNCSD</b> | 200                             | 46                                | \$6,717,584  | \$33,587  | \$146,034   |
| <b>NCSD</b>  | 245                             | 98                                | \$35,178,366(2)  | \$143,585   | \$358,963   |
|              | <b>655</b>                      | <b>271</b>                        | <b>\$60,441,230</b>  | <b>\$92,277</b>   | <b>\$223,030</b>  |

**Notes:**

1. Approximate average daily census of residential students in 1999 during school session.
2. Includes priorities 1, 2 & 3 please refer to Capital Improvements Projects per individual campuses. At NCSD, includes \$20 million for current Main Building renovations but excludes \$12 million for re-use of campus buildings by others.
3. All construction costs at 1999 value.

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## ***INTRODUCTION AND METHODOLOGY***

### ***North Carolina Schools for the Deaf***

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#### **Introduction**

This facility analysis was performed under contract to the Office of the State Auditor, State of North Carolina. It is part of an overall Program Evaluation of the three North Carolina Schools for the Deaf and the related system of educational services for children who are deaf and hard of hearing.

The goal of this analysis was to assess the existing physical condition of the capital facilities of the three North Carolina Schools for the Deaf: Eastern NCSD in Wilson, Central NCSD in Greensboro, and North Carolina School for the Deaf (NCSD) in Morganton.

The analysis also sought to evaluate whether the schools' physical plants met the current needs of the schools' users.

#### **Methodology**

The methodology for this study included the following research and analytical activities performed by Hoskins Scott & Partners, Inc. (HS&P), an architecture and planning organization with specific experience in health care and educational facilities:

- Review of relevant site and building plans.
- Site visits and building-by-building inspectional tour by architect/planner team from Hoskins Scott & Partners, Inc. (HS&P).
- Interviews with campus administrator and physical plant or facilities director. Certain teaching and administrative staff were interviewed during the course of the campus tours.
- Review of updated summaries of facility- and state-generated repairs and capital improvements (funded and proposed).
- Review of scope and budget for capital projects funded and/or underway.

Specific sources reviewed included:

- Building Summaries prepared by the State Property Office (detailing age and size of buildings).
- Facility Condition Assessment Program (FCAP) Reports from the NC Department of Administration (indicating specific buildings, deficiencies, priorities and preliminary cost estimates).
- State Construction Office Worksheet OC-25 Request forms for year 1999-2000.
- Annual building code, fire safety, and life safety inspection reports by the NC Department of Insurance, Office of the State Fire Marshall.

The authors' preliminary cost estimates for repair, capital improvement and modernization of existing buildings and systems were developed using a square-foot or systems-based cost analysis. This data was adjusted based on recent projects and facility- and agency-reported data.

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## ***CAMPUS OVERVIEW - North Carolina Schools for the Deaf***

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### **Three-Campus Overview**

The three school campuses are comprised of 843,000 gross square feet of building space, ranging in age from turn-of-the-century to the 1990's.

There are approximately 271 residential students and 138 day students, for a total of 409 students during a typical school session.

The actual number of students in residence is far less than the design capacity of each campus. As a consequence, the ratio of building volume (measured in gross square feet) to the number of students is quite high, indicating that the base operating cost per student (the cost of heating, cooling, electricity, maintenance, etc.) is also very high.

---

### **Student Population: Design Capacity vs. Actual Census**

#### **North Carolina Schools for the Deaf**

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|                              | <b>Residential<br/>Student<br/>Design<br/>Capacity</b> | <b>Residential<br/>Student<br/>Census</b> | <b>% of<br/>Residential<br/>Beds<br/>Occupied</b> | <b>Day<br/>Students</b> | <b>Total Students<br/>(Residential and<br/>Day)</b> |
|------------------------------|--|---|---|-------------------------|---|
| <b>ENCSD/<br/>Wilson</b>     | 210  | 127                                       | 60%   | 59                      | 186   |
| <b>CNCSD/<br/>Greensboro</b> | 200 /128 (1)   | 46  | 23/36%  | 36                      | 82  |
| <b>NCSD/<br/>Morganton</b>   | 245 (2)  | 98  | 40%   | 43                      | 141   |
|                              | <b>655/583</b>   | <b>271</b>                                | <b>41/46%</b>                                     | <b>138</b>              | <b>409</b>  |

#### **Notes:**

1. The School reported 128. Authors' count of dormitory beds is 200 based on floor plans and site visit.
2. Does not reflect substantial additional beds which have been taken off-line over the years.

**CAMPUS OVERVIEW - North Carolina Schools for the Deaf**


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**Comparison of Overall Campus Space Utilization** (gross square feet/student)  
**North Carolina Schools for the Deaf**


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|                              | <b>Design<br/>Capacity<br/>(DC)</b> | <b>Actual<br/>Census<br/>(AC) (1)</b> | <b>Total<br/>Volume<br/>(gsf)</b> | <b>gsf/Student<br/>Design<br/>Capacity<br/>(DC)</b> | <b>gsf/Student<br/>Actual<br/>Census<br/>(AC)</b> |
|------------------------------|-------------------------------------|---------------------------------------|-----------------------------------|---|---|
| <b>ENCSD/<br/>Wilson</b>     | 210                                 | 127                                   | 266,000                           | 1,267   | 2,094   |
| <b>CNCSD/<br/>Greensboro</b> | 200                                 | 46                                    | 147,000                           | 735   | 3,196   |
| <b>NCSD/<br/>Morganton</b>   | 245                                 | 98                                    | 430,000 (2)                       | 1,755   | 4,388   |
|                              | <b>655</b>                          | <b>271</b>                            | <b>843,000</b>                    | <b>1,287</b>  | <b>3,111</b>                                      |

**Notes:**

1. Approximate average daily census of residential students in 1999 during school session.
2. Does not include Goodwin/Joiner complex.

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***North Carolina School for the Deaf (NCSD)***

***Morganton, NC***

## **CAMPUS DESCRIPTION**

**Overview**

**Residential Buildings**

**Educational/Classroom Buildings**

**Programmatic and Support Buildings**

**Administration Building**

**Unoccupied Buildings**

## **FINDINGS**

**Residential and Classroom Buildings**

**Educational Classroom Buildings**

**Programmatic and Support Buildings**

**Administration Building**

**Unoccupied Buildings**

## **CONCLUSIONS/RECOMMENDATIONS**

## **CAPITAL IMPROVEMENT PROJECTIONS**

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**CAMPUS DESCRIPTION - Overview****North Carolina School for the Deaf (NCSD)****Morganton, NC**

NCSD is one of the most beautifully-sited public institutional facilities in the United States.

NCSD's large, landscaped hilltop campus has 465,000 gsf across 18 major institutional buildings. The campus is located close to downtown Morganton and includes farm buildings, playing pastures, large open fields, woodlands and a half-dozen single-family residences (formerly staff residences).



The campus is located adjacent to other institutions in a large mega-campus spanning several large hilltops and valleys, including Broughton Mental Health Hospital and Western Piedmont Community College.



The crescent-shaped campus plan spans two prominent ridges, with long 360-degree views, mature trees and well-planned access roads.

The campus grew in size and capacity over time, with major periods of construction and renovation occurring in the 1930's, late 1950's and early 1970's. The construction dates of today's buildings range from 1891 to 1974.

Several larger older buildings are historically significant. Some of these buildings are long-abandoned, others are currently under renovation.

The last major construction activity, in the early 1970's, added large dormitory and classroom buildings.



The overall campus is arranged in several smaller zones: the Main-Crutchfield-Hoey-Hoffmeyer complex, Joiner-Goodwin (now vacant), the Henderson-Jeter dorm-classroom pair, and Rankin, which stands alone at the opposite end of the crescent-shaped campus plan.



Originally designed for a residential capacity of over 500, the current residential capacity is approximately 245, and the average current occupancy is 98 residential students and 43 day students.



## ***CAMPUS DESCRIPTION - Residential / Classroom Buildings***

### ***North Carolina School for the Deaf (NCSD)***

***Morganton, NC***

#### ***Main Building***

*Construction Date*            1891

*Floor(s)*                            4

*Sq.Ft. (gsf)*                    86,167

Constructed in 1891, the Main Building is the original school building for the campus. It is a historically significant structure and is on the national register of historic buildings.

This impressive building is currently under renovation and will house residential, classroom and dining functions for many of the School's current students.

See "Findings" below for a full description of current condition and proposed uses.



#### ***Henderson Hall***

*Construction Date*            1971

*Floor(s)*                            3

*Sq.Ft. (gsf)*                    31,395

Henderson, a residential building constructed in parallel with the Jeter classroom building, is of similar materials, but has been partially phased out of use due to poor condition, including water leaks, asbestos and various code violations.



Designed to accommodate up to 136 residents, Henderson is currently housing 45 to 50 students. Upon completion of the Main Building renovation, scheduled for spring 2001, Henderson will be abandoned as a residential building and will be a candidate for re-use.

**CAMPUS DESCRIPTION - Residential / Classroom Buildings****North Carolina School for the Deaf (NCSD)****Morganton, NC****Rankin Hall***Construction Date* 1954*Floor(s)* 1*Sq.Ft.(gsf)* 38,535

Rankin is the campus' self-contained Elementary School classroom and residential building. It has a central T-shaped core, plus residential wings at either arm of the T. The center core contains a reception hall, auditorium/theatre, dining room and kitchen. Two

linear corridors off the center core contain classrooms, computer room, activity, Occupational Therapy/Physical Therapy (OT/PT) and specialty rooms. At the ends of the corridors are the dormitories, with approximately two children per bedroom and gang bathrooms at the end of each dorm suite.

Overall, the interior is attractive, very comfortable and in good condition. The interior finishes are painted concrete block, with ceiling tile and carpeting throughout. Lighting is generally adequate. The air conditioning appeared adequate even on very hot days keeping the spaces at a pleasant temperature.

The building has capacity for additional students. It was originally designed for 54 students and currently holds 15 students.



**CAMPUS DESCRIPTION - Residential / Classroom Buildings****North Carolina School for the Deaf (NCSD)****Morganton, NC****Hoffmeyer Hall***Construction Date* 1959*Floor(s)* 3*Sq.Ft.(gsf)* 38,780

Originally a dormitory, Hoffmeyer's top floor (3<sup>rd</sup>) is being used, on an interim basis, as housing for middle and high school girls, until the renovation of the Main Building is complete and they can be relocated.



Floor Two is comprised of offices for teachers, specialists and administrators as well as the Division's Regional Resource Center (Morganton Office).

The ground floor is under a ten-year lease agreement with an outside agency (a developmental evaluation center) which undertook substantial cosmetic improvements to its space in 1993.

Hoffmeyer has a long straight center corridor with small rooms off the corridor. The improved ground-floor office rental space (new carpeting, paint, finishes, through-wall AC units) shows what the building could look like. The third floor space, currently used as a dorm is poorly ventilated, has no air conditioning and requires substantial bathroom and interior finishes improvement.

The cafeteria/kitchen wing on the ground floor has large windows, is very pleasant and in good condition--a good site for group meetings, clubs and gatherings.

## ***CAMPUS DESCRIPTION - Educational / Classroom Buildings***

---

### ***North Carolina School for the Deaf (NCSD)***

***Morganton, NC***

#### ***Hoey Hall***

*Construction Date*      1939

*Floor(s)*                      3

*Sq.Ft.(gsf)*                22,620

Hoey serves as the High School building, offering classrooms, functional areas and administrative space. It is considered to be in the poorest condition of the presently functioning buildings on campus, which is in large part due to its age and the absence of any major or comprehensive modernization.

It is laid out on a North-South axis, in line with the Main Building, to which it is connected via Crutchfield Hall. Hoey has a central corridor, main entrance at the center of the building and side entrances at either end.

An L-shaped annex to Hoey houses a large wood shop in an industrial type building.

#### ***Hoey Addition***

*Construction Date*      1949

*Floor(s)*                      3

*Sq.Ft.(gsf)*                16,524



**CAMPUS DESCRIPTION - Educational / Classroom Buildings**

---

**North Carolina School for the Deaf (NCSD)****Morganton, NC****Jeter Hall***Construction Date*        1971*Floor(s)*                        2*Sq.Ft.(gsf)*                21,150

Jeter Hall is a two-floor structure housing Middle School classrooms and related functional and administrative areas. It was originally designed as the classroom complement of the Henderson dormitory building.



Generally, Jeter Hall is considered to be in the best condition of functioning buildings on campus. Its interior finishes are in good condition. The interior was constructed with 70's style demountable (moveable) modular partitions. The partitions are in good condition and do not appear to have been moved over the years.

Although both floors are externally accessible from ground level (Jeter is located on a hillside), there is no elevator and hence no interior vertical handicapped accessibility.

## ***CAMPUS DESCRIPTION - Programmatic and Support Buildings***

### ***North Carolina School for the Deaf (NCSD)***

***Morganton, NC***

#### ***Crutchfield Hall***

*Construction Date*      1971

*Floor(s)*                      2

*Sq.Ft.(gsf)*                13,766

Crutchfield was originally designed for use as a print shop. Part industrial building and part office/classroom, its layout includes large open print rooms designed to handle heavy equipment. (Printing was traditionally perceived as a vocational objective for deaf students.)



Crutchfield continues to house printing functions, but as printing technology evolves to utilize smaller, computer-driven machines, and as the overall student population declines, there is less and less need for this space.

As the space needs for printing technology shrinks, the building has begun to be adapted to other uses. Crutchfield now houses an Information Systems office and is the hub for the campus computer network. It also houses the library for the High School. Present plans include: expanding the library into the unused Print Shop space, allowing middle and high school libraries to be combined in one location. This appears to be an excellent proposed location, given that it is directly adjacent to high school classrooms in Hoey and student residential space in Main.

#### ***Old Gym***

*Construction Date*      1923

*Floor(s)*                      3

*Sq.Ft.(gsf)*                11,692

The Old Gym contains gymnasium space on the top floor, with impressive steel trusses characteristic of the 1920's. The lower level houses changing rooms and a lap-type swimming pool. Air conditioning is not provided. Windows were replaced with an aluminum combination sash in the early 1980's.

This is an attractive and useful building presently somewhat under utilized.

## ***CAMPUS DESCRIPTION - Programmatic and Support Buildings***

***North Carolina School for the Deaf (NCSD)***

***Morganton, NC***

### ***Rondthaler Hall***

*Construction Date*      1927

*Floor(s)*                      3

*Sq.Ft.(gsf)*                12,765

Rondthaler is essentially an open-floor industrial type building, probably once used for vocational activities like printing and metalworking.

It is now used mostly as maintenance workshops and storage/warehouse. It has its original steel windows.



Rondthaler is considered a good industrial building which, with extensive systems upgrade, could accommodate office, classroom, library or vocational studio uses.

### ***Underhill Gym &***

### ***Alumni Field***

*Construction Date*      1927

*Floor(s)*                      2

*Sq.Ft.(gsf)*                22,821

Extensively used by students, Underhill offers the only full-size high school gym facility on campus. Built on the side of a steep hill, with a main entrance on the hilltop side,

Underhill is used for basketball and volleyball in the upper-floor gym. Locker and shower facilities for all activities are located on the ground level and adjacent football field and track. The building does not have an elevator. There is extensive underutilized space on the ground floor.



Underhill is considered a key facility on campus.

## ***CAMPUS DESCRIPTION - Programmatic and Support Buildings***

### ***North Carolina School for the Deaf (NCSD)***

***Morganton, NC***

#### ***Northcott Hall***

*Construction Date*        1974

*Floor(s)*                        2

*Sq.Ft.(gsf)*                16,766

Northcott Hall is a high-ceiling vocational/technical education building, built on the hillside adjacent to Underhill Gym.

It offers multi-purpose voc-tech training with classrooms, offices, drafting rooms upstairs (accessed at the hilltop level) and automotive/industrial downstairs (accessed at ground level at the base of the hill).

Northcott contains a pilot joint venture vocational program, now 4-5 years old, between Burke County Schools (Freedom H.S.) and the School for the Deaf. This program aims to evaluate the efficacy of integrating deaf students and hearing students.

One of the newest buildings on campus, it is air-conditioned and in relatively good condition. There is no elevator, however.



#### ***Service Building***

*Construction Date*        1915

*Floor(s)*                        2

*Sq.Ft.(gsf)*                27,054

Although one of the oldest buildings on campus, it was soundly constructed and is in reasonable condition. The Service Building is constructed of red brick and has a slate roof. Its windows were replaced in 1982. It houses the laundry (a candidate for outsourcing) and provides space for storage and maintenance workshops. The facility reports that there is generally adequate space for current functions.



## ***CAMPUS DESCRIPTION - Programmatic and Support Buildings***

### ***North Carolina School for the Deaf (NCSD)***

***Morganton, NC***

#### ***McCord Student Union***

*Construction Date*      1968

*Floor(s)*                      2

*Sq.Ft.(gsf)*                16,654

McCord, built on a hillside with access from two levels, has a gymnasium upstairs (large, but reportedly, non-regulation size) and a student canteen and "hang out" spot downstairs.

It is in excellent condition, although it lacks appropriate handicapped access (no means of vertical access), hardware and bathroom features.



#### ***Infirmary***

*Construction Date*      1927

*Floor(s)*                      2

*Sq.Ft.(gsf)*                7,230

The original older infirmary building is now used for student support services, social services and other administrative functions and was renovated in 1992 for these functions.

The actual functioning infirmary is now housed in a wing added in 1968 at the west end of the building. Audiology is housed in a new wing at the east end of the building, constructed two years later in 1970.

#### ***Infirmary Addition***

*Construction Date*      1968

*Floor(s)*                      1

*Sq.Ft.(gsf)*                2,507



#### ***Infirmary Addition***

*Construction Date*      1970

*Floor(s)*                      2

*Sq.Ft.(gsf)*                2,506

Today's functioning Infirmary is located in the newer West Wing (located in the left, above).

## ***CAMPUS DESCRIPTION - Programmatic and Support Buildings***

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***North Carolina School for the Deaf (NCSD)***

***Morganton, NC***

### ***Chapel***

*Construction Date*        1974

*Floor(s)*                        2

*Sq.Ft.(gsf)*                  7,238

This attractive single-story place of worship of “contemporary” design is located at the center of the campus and is convenient to all campus locations. The chapel is used for meeting and social functions for students as well as religious services.



## ***CAMPUS DESCRIPTION - Administrative Building***

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***North Carolina School for the Deaf (NCSD)***

***Morganton, NC***

### ***Superintendent's House***

*Construction Date*        1890

*Floor(s)*                        2

*Sq.Ft.(gsf)*                  7,495

Originally, the School Superintendent's residence, an impressive masonry home, is now used for administrative offices, meetings and conferences.



**CAMPUS DESCRIPTION - Unoccupied Buildings****North Carolina School for the Deaf (NCSD)****Morganton, NC****Joiner Hall**

*Construction Date*      1929

*Floor(s)*                      3

*Sq.Ft.(gsf)*                20,873

Situated adjacent to Goodwin Hall and of similarly attractive early 20<sup>th</sup> century architecture, Joiner was designed for classroom use, with a large center-entry reception hall, wide corridors and large classrooms with high ceilings.



Joiner was most recently occupied by a state agency tenant.

This building has not been adequately modernized and is not usable in its present condition due to poor interior finishes, lead paint, and inadequate life safety compliance.

**Goodwin Hall**

*Construction Date*      1910

*Floor(s)*                      3

*Sq.Ft.(gsf)*                18,400

One of the early buildings on campus and a fine representative of early 20<sup>th</sup> century institutional architecture, Goodwin, presently vacant, has been extensively renovated over the course of its lifetime.



Not modernized to today's standards, it is in very poor condition internally and will likely need a total "gut" renovation to be placed back into use.

After the Main Building, Goodwin is the NCSD's second most dominant and visually impressive building, anchoring a second campus cluster at the eastern end of the hilltop campus crescent.

Originally a dormitory, Goodwin has been vacant for over twenty years except for the use of first floor space by public agencies. The ground floor at the north end is currently in use as a headquarters for teachers in a community-based pre-school/early intervention program.

**CAMPUS DESCRIPTION - Unoccupied Buildings**

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**North Carolina School for the Deaf (NCSD)****Morganton, NC*****Cattle Barn***

*Construction Date*        1939

*Floor(s)*                        2

*Sq.Ft.(gsf)*                  10,296

This attractive barn was once the center of activity for the campus's farm program. Located in a large hillside pasture with mountain views for 180-degrees, it is now used for general storage.

***Former Staff Cottage***

*Construction Date*        1925

*Floor(s)*                        2

*Sq.Ft.(gsf)*                  1,800

This former staff cottage, located at the western Main Entrance to the campus, is used for agency program and office space.



**FINDINGS*****North Carolina School for the Deaf (NCSD)******Morganton, NC*****Residential / Classroom Buildings****Main Building**

A strategically-planned full renovation of the Main Building complex is underway at the time of this report. Begun in 1996 and due for completion in May 2001, this project has had several stops and starts due to incomplete funding and changes in scope. (Construction began in December 1996 on a much more limited scope of work, then went through a series of changes and upgrades to the presently proposed total renovation.)

Typical of many 19th century institutional buildings across the country, the wood floors were removed and new concrete slabs placed to improve the fire resistance of the building (c. 1938). Wood structures in the roof and attic remain in place and continue to pose a fire threat. In response, fire protection of the attic spaces (sprinklers and fire walls) are planned in the present renovation project.

In 1954, much of the 1<sup>st</sup> floor interior was modified, removing the grand open stair and other 19<sup>th</sup> century features, in the interest of modernizing the space and making it more efficient.

After renovation, Main will provide residential facilities for male and female Middle and High School students<sup>12</sup>. Floors 2, 3 and 4 will be residential space, and the 1<sup>st</sup> floor will be for administrative and common areas, including a new library to be shared by the Middle and High Schools. Also on the 1<sup>st</sup> floor is the kitchen and cafeteria, serving breakfast, lunch and family-style dinners.

The exterior is being totally upgraded and repaired: slate roofs rebuilt, brick exterior repaired and mortar joints re-pointed, windows replaced (except ground floor), perimeter foundation walls waterproofed and historic details refurbished or replaced with historically-accurate fabricated components. Each of these construction items are essential, but carry hefty price tags: re-pointing alone is estimated at approximately \$450,000 (1999 dollars) and roof repair/replacement will cost at least \$1 million (1999).

Inside, vinyl-asbestos tile is being removed throughout; a new elevator installed; the kitchen will be updated to present fire codes, including fire suppression at the stove exhaust hoods; all new wiring throughout, including fire alarm and data hookups within each of the residential suites.

Residential floors will remain primarily single occupancy rooms with shared toilets. In addition, each floor will have several apartment type suites with private bath, including double-occupancy ADA-compliant rooms with fully-accessible bathrooms.

Renovation projects such as this are notoriously difficult for establishing fixed cost estimates, and it will be likely that final costs for construction, furnishings and equipment will fluctuate up and down as the project moves toward completion.

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<sup>12</sup> Middle and High School boys are being housed, temporarily, in Henderson Hall. Middle and High School women are being housed, temporarily, on the 3rd floor of Hoffmeyer Hall.

**FINDINGS*****North Carolina School for the Deaf (NCSD)******Morganton, NC*****Henderson Hall**

Henderson had been largely phased out of use due to poor condition, including leaks, asbestos and various code violations.

It is laid out in separate suites, each containing several 4-8 person bedrooms, a "senior suite" for older on-site residents, gang bathroom and living room.

Emergency short term repairs were made recently in order to re-open Henderson to full use as an interim residence for Middle and High School boys while construction is underway at the Main Building.

Upon completion of the Main Building renovation, scheduled for spring 2001, Henderson will be abandoned as a residential building and will be a candidate for re-use. AC repairs and upgrade are presently on order for Henderson.

Like Jeter, the exterior "glasweld" panels are failing and difficult to repair. The flat roof needs to be replaced. Existing floor tile contains asbestos and needs to be removed or encapsulated. Stairwells are non-conforming in some aspects, including headroom and fire doors. Sub-floor waterproof membranes in toilet room floors have deteriorated and are subject to leaking. The fire alarm system was brought into compliance as of 1989, but does not have today's optimal sensors and alarm outputs. Henderson is also in need of an elevator and air conditioning upgrades. Optimally, the original aluminum single-pane vent-style windows should also be replaced with energy efficient units, but these are less of a priority.

**Hoffmeyer Hall**

The upper floor (residential) is not air conditioned. The shared toilets lack handicapped accessibility. Since residential use is an interim situation, upgrades for continued residential use are not anticipated.

The ground and 2<sup>nd</sup> floors are air conditioned, with AC upgrade and repair presently on order. The fire alarm system is adequate for office occupancy. Approximately half of the heat pumps were replaced in 1993.

Handicapped accessibility in general is poor, given the 1/2-floor stair connection with the cafeteria area and lack of vertical pathways (although a rear ramp from behind Hoey does help connect Hoffmeyer to the exterior area behind the Main building complex).

With some renovation, this building could be an excellent office building. Residential use, its original function, is also possible, but would require more extensive handicapped access improvements, fire safety and bathroom overhaul.

**Rankin Hall**

Rankin has had some important investment in the last ten years, notably a new chiller (1998-1999) and duct work, ceilings and lighting (1988).

One important project for the very near future is roofing. Rankin was designed with extensive flat and almost-flat roof areas, which have deteriorated and are leaking in many areas. Present FCAPs

**FINDINGS****North Carolina School for the Deaf (NCSD)****Morganton, NC**

are in place to address immediate roof *repair*. Roof *replacement* is needed long term, perhaps including reconfiguration of the roof slope.

Residential bathrooms are in need of overhaul, especially for handicapped (HP) access, and new HP hardware throughout. The HVAC system is reasonably functional. Some cosmetic upgrades are needed to improve comfort and appearance. Few interior improvements have been made since the building opened in 1954 except for routine maintenance and work detailed above.

There are also miscellaneous life safety needs such as door replacements to provide required fire separations.

**Educational / Classroom Buildings****Hoey Hall**

Hoey is considered to be in the poorest condition of the occupied buildings on campus. Renovation is seriously needed. Phased renovation will be difficult since the building is presently in full use.

One strategic goal for Hoey would be to house all classrooms for Middle and High School, since the residence for Middle and High School will be next door in Main.

Hoey's interior finishes are worn. Existing air conditioning is operationally inadequate. The third floor lacks air conditioning altogether. Although an attempt was made recently to improve ventilation and cooling, the lack of sufficient funding and the absence of engineering design direction (also due to the funding limitations) prevented the project from truly succeeding, although it did improve conditions somewhat. The present chiller piping is undersized for the load. The system provides cooling through ceiling fan coil units which temper and recirculate internal air and do not offer fresh air make up.

Functional safety issues such as the lack of safety glass at vulnerable openings exist throughout the building with potential risk to student and faculty injury. Fire doors are needed at stairwells.

Spending to address these issues is falling seriously behind need. Indicative of the "make- do" repair approach is the handicapped ramp constructed at one end of the building. Exposed to the elements, the ramp is an extensive structure that solves handicapped access for the building at probably 75 to 80% of the cost of an elevator. An elevator would have been much more usable and effective had the additional 20 to 25% been added to the budget. An elevator is now being added as part of the Main Building contract.

(See Crutchfield Hall in Programmatic/Support Buildings below).

The L-shaped annex (wood shop) has exposed spray-on fire-proofing material as a ceiling finish and this material is reported to contain asbestos. Given the high chance of disturbing this finish (wood shop activities, handling of lumber), and the high volume of air circulation (large exhaust fans are present), this appears to be a highly substandard environmental condition in need of remediation.

**FINDINGS*****North Carolina School for the Deaf (NCSD)******Morganton, NC*****Jeter Hall**

Generally, Jeter Hall is considered to be in the best condition of functioning buildings on campus.

Although well-maintained and a recipient of some investment in the recent past (a new chiller was added in 1995, and new exterior doors), it does have certain items which require repair or upgrade depending on its future use.

An elevator is needed for internal circulation. Fire safety issues are present with the current configuration of the library, which is open to the main corridor (eventually, middle and high school libraries will be combined into a single facility in the renovated Main Building). The fire alarm system is not code compliant. The exterior has "glasweld" and asbestos-containing panel units near its windows: these are brittle and failing and are difficult to replace and repair. A 1978 TV broadcast studio is now out of date, unused, and has a spray-on ceiling finish reported to contain asbestos.

**Programmatic and Support Buildings****Crutchfield Hall**

Crutchfield is in serious need of repair (or more likely, replacement) of the lower (flat) roof located over the rear print shop area. A further investment strategy for this building depends on its intended reuse function.

**Old Gym**

Air conditioning is not currently provided. The slate roof needs some minor repair. New windows were installed in the 80's but they are single pane and not energy efficient. This is an attractive and useful building, presently somewhat under utilized.

**Rondthaler Hall**

The exterior of this open floor industrial-type building is in reasonable condition. The roof is good. The windows are in good shape but are single pane, metal frame industrial type, not energy efficient. Rondthaler is considered essentially a good building which would require extensive systems upgrade to accommodate office or classroom use.

**Underhill Gym & Alumni Field**

In Spring 1998, the gym floor was replaced. The roll-out bleachers in the gym need either extensive renovation or replacement. The seats are splintering and are a hazard to spectators. The roof is scheduled for replacement over the next three years as part of a presently funded campus wide study. The building is not air conditioned. The locker rooms need improvements including lighting, finishes and updated shower, sink and toilet fixtures. The building does not have an elevator.

**FINDINGS*****North Carolina School for the Deaf (NCSD)******Morganton, NC*****Northcott Building**

Northcott's roof is in need of replacement. Otherwise, at 25 years old, this is one of the newest buildings on the campus and is in reasonable condition.

**Service Building**

The Service Building is in reasonable condition. It requires roof and gutter repairs (there is a combination of slate roofs on the slope and built up roofs at flat areas).

**McCord Student Union**

McCord is in excellent condition. It does require vertical accessibility, and handicapped accessibility upgrades to bathrooms and hardware.

**Infirmary**

This three-structure complex (original building and two additions) is in good condition. As with most campus buildings, deferred maintenance and handicapped access are the major issues. The infirmary function could benefit from some modernization and changes in layout, but it is not clear why this little-used residential and outpatient function could not be downsized, contracted out and/or relocated to the all-residential Main complex.

**Chapel**

The Chapel has recently received new air conditioning and a new roof (August 1999). It is in excellent condition.

**Administration Building****Superintendent's House**

This historic structure is in good condition but could benefit from minor upgrades and handicapped access improvements.

**FINDINGS*****North Carolina School for the Deaf (NCSD)******Morganton, NC*****Unoccupied Buildings****Joiner Hall**

This building is currently unoccupied and is a candidate for full modernization, having already received some partial investment.

Use of Joiner was discontinued in part based upon hazardous materials (lead paint) and other safety issues. Since the last tenant has moved out, the interior of this building has deteriorated rapidly. The ceiling panels and wall and floor finishes are in particularly poor condition.

The building needs roof, gutter and window replacement. Inside, it needs lighting and handicapped access improvements. A new chiller was added in 1996 and is sitting unused. Many of the building's utility systems are in near operational condition.

**Joiner Hall Gym**

Closed because of roof leaks, Joiner Gym will be re-opening in late 1999 as roof repairs are completed (August 1999) and the interior is cleaned up and refurbished (minimal).

**Goodwin Hall**

Goodwin has been vacant for twenty-plus years except for some agency use of first floor space. The building is in poor condition internally and will need a total gut renovation in order to be placed back into use. The original wood floors have been replaced with concrete. Like the Main Building, wood structure continues in the attic and roof space and will require fireproofing and sprinklers. Also, like the Main Building, the original grand entrance foyer seems to have been gutted and rebuilt in an earlier "modernization" effort.

Like all large vacant buildings, especially those with historic significance, Goodwin needs to be protected from vandalism and from the elements during interim periods of nonuse. Adequate protection includes covering window openings and providing for minimal heat and air conditioning to protect finish materials.

**Cattle Barn**

The Cattle Barn needs its roof replaced. Any additional improvement would depend on its eventual reuse objective. Although just a barn, this building's location, panoramic views and simple architecture make it a very attractive landmark and possible site for reuse.

## CONCLUSIONS AND RECOMMENDATIONS

### ***North Carolina School for the Deaf (NCSD)***

### ***Morganton, NC***

#### **1. NCSD's campus, buildings and infrastructure are grossly oversized for the current school population.**

Influenced in part by the layout and location of buildings on a campus originally designed for many hundreds of students, and in part by the natural tendency of any organization to "spread out" and use any space that is available, the operations of NCSD are spread out across a very wide set of buildings and a very large total volume of occupied space.

A relatively small number of students (98 residential, 43 days students) now benefit from an institutional infrastructure that includes four gyms, several cafeterias, dozens of separate vocational training spaces, a stand-alone infirmary and several libraries. Many of these are located in completely separate, aging buildings, all with their own physical maintenance and upkeep liabilities: roofs, windows, heat, air conditioning, mechanical systems, etc.

If one were to design a school today for this number of students, all of these functions would be consolidated within two or three efficient, multi-use buildings.

The current situation presents an opportunity to reorganize the physical assets of this campus to better meet the operational goals of the school and to dramatically lower its capital and operating cost liabilities.

#### **2. Consolidation of NCSD functions to smaller, more cost-efficient quarters could help conserve operating and capital dollars.**

NCSD has taken a giant step toward consolidation of its physical assets by renovating the Main Building, which will house over 200 children. This renovation strategy also resolves the dilemma of what to do with a non-code-compliant historic institutional building in danger of deterioration.

The recent investment in Main Building warrants a planning process that seeks to consolidate all campus operations in or near the Main-Crutchfield-Hoey complex (this could include Underhill, Northcott, Rondthaler, Service and McCord). For example, classrooms for Middle and High School could be consolidated at Hoey since the residence for Middle and High School will be next door in Main. This type of plan would require significant additional investment, but would produce an accelerated pay back period fueled by savings from the disposition of surplus buildings and from a reduction in the size of capital portfolio which must be heated, cooled, and maintained. Many scenarios are possible.

#### **3. Compatible reuse of vacant campus buildings is ideal.**

As discussed above, the campus can be divided into several smaller zones: the Main-Crutchfield-Hoey-Hoffmeyer complex, Joiner-Goodwin (now vacant), the Henderson-Jeter dorm-classroom pair (possibly vacant in the near future), and Rankin, which stands alone at the opposite end of the crescent-shaped campus plan.

These zones are natural clusters and each zone may be considered for individual transfer to other public or private entities.

Ideally, any new tenants or new owner/occupants on this campus would consist of very compatible or neutral uses. For example, public or private school reuse of any of NCSD's vacant

## CONCLUSIONS AND RECOMMENDATIONS

### *North Carolina School for the Deaf (NCSD)*

### *Morganton, NC*

buildings would allow both NCSD and this new educational partner to share library, communications, food service, maintenance and physical education assets.

Among many possible scenarios are the following:

The Goodwin-Joiner complex has been discussed as a possible location for a County-wide magnet school, specialty school or mainstream school campus, with many shared inclusionary joint-venture programs between the County and the NCSD. Although this renovation may be more expensive than new construction for the County, there may be net savings through the use of shared facilities.

Jeter and Hoffmeyer both have fringe locations (located at the edge of the campus) and as such, may potentially be used as governmental or private sector office space.

In another scenario, Jeter and Henderson could be utilized together as a self-contained residential facility for other human services, child welfare or assisted living populations. Henderson will require substantial renovation.

Hoffmeyer alone, renovated for improved residential space, could also be a stand-alone residential and program building for a human services population or for assisted living.

#### **4. A long-range, campus-wide programmatic and physical Master Plan is urgently needed for NCSD.**

To capture and organize the necessary data required to advance a strategic plan for the future of this campus, NCSD is in desperate need of a campus Master Plan.

This Master Plan would identify NCSD's 5-10 year mission and set projections for residential and day populations.

A physical description of the programmatic needs of this population should be prepared, and a set of physical-plant Investment Options developed for the campus, showing capital costs, operating costs, and any related savings offsets.

The Master Plan would have four deliverables: 1) a physical Consolidation Strategy; 2) Cost Estimates for investment in the consolidated campus and corollary estimates of cost savings and revenue from the sale of assets; 3) assets to be surplus and the sequence of capital spending; and 4) compatible Reuse Concepts for the surplus land and buildings.

Of course, master planning for NCSD should have input from the agencies responsible for statewide institutional and community-based services for the deaf and hard of hearing.

Master planning for NCSD should also include input from state agency representatives who are responsible for identifying the long range facility needs and the state government as a whole.

## CONCLUSIONS AND RECOMMENDATIONS

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### ***North Carolina School for the Deaf (NCSD)***

### ***Morganton, NC***

- 5. Many buildings and systems at NCSD require a moderate amount of repair, replacement and upgrade without extensive delay.**

NCSD has not had sufficient resources to keep up with the tremendous cost of maintenance, repair, and modernization required by a campus of this size. Regardless whether or not a masterplan process is instituted, much improvement is needed today.

Overall, the campus is in fair condition, but conditions are mixed depending on the actual buildings involved. Overall, a moderate volume of repair, replacement, and upgrade is needed in the areas of HVAC systems and controls, roofs, bathrooms, fire safety and alert systems and ADA.

The list of necessary improvements is generally well-documented at the campus and state administrative level and is currently subject to budgetary prioritization. These improvements are much-needed and should be performed as soon as is feasible.

- 6. Buildings or building portions that are vacant and "on-hold" should be protected by "mothballing".**

Thousands of square feet of building space at NCSD are currently vacant or will become vacant in the near future. Current vacancies include Goodwin and Joiner. Future vacancies include Henderson, and perhaps portions of Hoffmeyer, Hoey and others depending upon the investment scenario.

Pending acquisition or control by a new tenant who can bring with it sufficient funds for full renovation and modernization, these buildings or portions, will continue to be "on-hold" and will need to be protected from the deteriorating effects of weather and vandalism. "On-hold" periods could easily range from 2-20 years. Often, what is planned as a 2-year vacancy becomes twenty.

Proper "warm" mothballing (versus cold mothballing) includes minimal heat and moisture control, window covering (attractively-painted exterior plywood covers), complete roof repair and/or replacement and minimal fire detection and alarms.

These protections are not inexpensive but are valuable insurance against potential fire, demolition and/or more extensive renovation at a later date (see Cost Estimate section of this report). Institutions with similar challenges and which did not properly protect their buildings have experienced tragic fire and structural damage.

**CONCLUSIONS AND RECOMMENDATIONS*****North Carolina School for the Deaf (NCSD)******Morganton, NC***

- 7. NCSD's physical plant assets could serve as educational, programmatic and recreational resources for the greater community.**

NCSD's gyms, libraries, conference rooms and other assets could serve as resources beyond NCSD's on-site residential deaf and hearing community. These amenities offer many opportunities for developing programming for the non-residential deaf community, as well as other community educational uses. Use by external entities, local community schools and businesses could possibly generate fee revenue.

- 8. NCSD's proximity to other large public institutions warrants further analysis of possible compatibility for shared services or assets.**

NCSD's proximity to Broughton State Hospital and other public facilities suggests an analysis of opportunities for combining certain operations or purchasing functions to gain cost efficiencies. Food service, laundry, maintenance and other operations are likely candidates.

- 9. Appropriate design and engineering expertise should be sought for the many smaller but persistent repair and upgrade issues.**

Issues about roofs, hardware, HVAC controls, HP access, and furnishings and equipment specifications are relatively non-complex but contain many details and are not effectively tackled on a piecemeal basis.

The State should acquire design and engineering assistance to focus on each of these issues in a systematic, campus-wide, non-piecemeal approach. Technical consultants could be hired on a multi-year, open-ended "house-doctor" basis to be available to campus staff as-needed.

***CAPITAL IMPROVEMENTS PROJECTION******North Carolina School for the Deaf (NCSD)******Morganton, NC*****Introduction**

Capital Improvements Projections were prepared based on the following activities and information.

1. Site visits: The study team met with administration and facility representatives at each of the campuses to discuss facility issues including known systems, safety and functional deficits, and likely future improvements. The study team then walked through each of the major buildings with facility representatives in order to observe the physical and functional conditions and to hear firsthand from those most directly knowledgeable of facility conditions.
2. Information Gathering and Assessment: The Study team then compiled a list of issues for each of the campuses and compared specific items to fcap reports for the campuses to determine what may already be funded or in line for future funding. The remaining items were then compiled and put into categories for calculation of likely funding levels.
3. Capital Improvements Projection: The team then prepared a spreadsheet for each campus listing by building: the present fcaps for 1999-2000, remaining fcaps for all priority categories, and other needs determined during the site visit, thereby preparing a projection of capital cost needs for each of the buildings to address facility needs noted.

The projections include construction costs for buildings and fixed equipment and do not include soft costs such as fees, furnishings, signage and movable equipment. Soft costs may add as much as 30% to 40% to the total depending upon the type and complexity of the project. The estimates for work not included in fcap listings were prepared without the benefit of floor plans which had not been compiled particularly for the older buildings where the anticipated work was most intensive. As a result, rules of thumb were used for projection purposes, for percentage of residential area within an overall building for example. In this way, the team arrived at areas to which \$/sf could be applied to arrive at a construction cost for the improvement. By applying equivalent methodologies to each campus' facility needs, a cost comparison of each campuses needs vis a vis others was developed. This is a preliminary effort to project the costs based on limited information. Actual values may differ when a more detailed study is conducted, yet the relative costs at each campus included here offer a valid picture of comparative capital needs.

**CAPITAL IMPROVEMENTS PROJECTION**

*North Carolina School for the Deaf (NCSD)*

*Morganton, NC*

- priorities
1. immediate / must be funded to present needs
  2. desirable / would improve present conditions
  3. long term / consider funding in 3 - 5 years

| Building/ Item                                | sf            | \$/sf        | total              | priority |  |
|---|---------------|--------------|--------------------|----------|--|
| <b>Residential / Classroom Buildings</b>      |               |              |                    |          |  |
| <b>Main Building</b>                          | <b>86,167</b> |              |                    |          |  |
| on going total renovation                     | 86,167        | N/A          | \$0                | 1        | included in present \$20 million plus funding          |
| present fcaps 1999-2000                       |               | N/A          |                    | 1        | included in present multi-million dollar funding       |
| remaining fcaps, all priorities               |               | None         |                    |          | needs satisfied by present project                     |
| <b>Subtotal Main</b>                          |               | <b>\$0</b>   | <b>\$0</b>         |          |  |
| <b>Henderson Hall</b>                         | <b>31,395</b> |              |                    |          |  |
| Renovate for alternative agency use           | 31,395        | \$100        | \$3,139,500        | 3        | following retirement from NCSD use                     |
| Repair toilet room floors and piping          |               |              | \$150,000          | 1        | allowance  |
| Present fcaps 1999-2000                       |               |              | \$0                |          | none funded  |
| Remaining fcaps, all priorities               |               |              | \$8,000            | 2,3      | replace lighting                                       |
|   |               |              | \$120,000          | 2,3      | replace windows & panels                               |
|   |               |              | \$20,000           | 2,3      | exterior wall repair                                   |
|   |               |              | \$13,000           | 2,3      | repairs to hw system                                   |
| <b>Subtotal Henderson</b>                     |               | <b>\$110</b> | <b>\$3,450,500</b> |          |  |
| <b>Hoffmeyer Hall</b>                         | <b>38,780</b> |              |                    |          |  |
| renovate for alternative agency use           | 38,780        | \$100        | \$3,878,000        | 3        | following retirement from NCSD use                     |
| present fcaps 1999-2000                       |               |              | \$0                |          | none funded  |
| remaining fcaps, all priorities               |               |              | \$10,000           | 1        | exterior wall repair                                   |
|   |               |              | \$45,500           | 1        | life safety corrections & fire alarm                   |
|   |               |              | \$100,000          | 3        | roof replacement                                       |
| <b>Subtotal Hoffmeyer</b>                     |               | <b>\$104</b> | <b>\$4,033,500</b> |          |  |
| <b>Rankin Hall</b>                            | <b>38,535</b> |              |                    |          |  |
| residential upgrade (finishes, fixtures, ADA) | 17,341        | \$50         | \$867,038          | 2,3      | estimated at 45% of total building                     |
| present fcaps 1999-2000                       |               |              | \$134,100          | 1        | install exterior elevator                              |
| remaining fcaps, all priorities               |               |              | \$23,600           | 1        | fire and life safety corrections                       |
|   |               |              | \$434,000          | 1        | building exterior and roof                             |
|   |               |              | \$196,800          | 2,3      | mechanical, electrical and lighting                    |
|   |               |              | \$10,500           | 2,3      | parking lot repair                                     |
| <b>Subtotal Rankin</b>                        |               | <b>\$43</b>  | <b>\$1,666,038</b> |          |  |
| <b>Educational / Classroom Buildings</b>      |               |              |                    |          |  |
| <b>Hoey Hall</b>                              | <b>39,144</b> |              |                    |          |  |
| upgrade HVAC (floors 1 and 2)                 | 25,835        | \$15         | \$387,526          | 1        | earlier upgrade inadequate                             |
| upgrade classroom environment                 | 39,144        | \$75         | \$2,935,800        | 2,3      | upgrade standards as main classroom building           |
| present fcaps 1999-2000                       |               |              | \$0                |          | none funded; new elevator as part of Main Bldg project |

**CAPITAL IMPROVEMENTS PROJECTION**

*North Carolina School for the Deaf (NCSD)*

*Morganton, NC*

| Building/ Item                               |                             | sf            | \$/sf        | total              | priority |   |
|--|-----------------------------|---------------|--------------|--------------------|----------|---|
| remaining fcaps, all priorities              |                             |               |              | \$77,000           | 1        | life safety, fire alarm   |
|  |                             |               |              | \$172,000          | 1        | HVAC system for 3rd floor   |
|  |                             |               |              | \$181,000          | 1        | electrical code violations  |
|  |                             |               |              | \$36,000           | 2        | roof replacement  |
|  |                             |               |              | \$135,000          | 2        | window replacement  |
|  |                             |               |              | \$0                | 1        | building renovations & toilets (included above)                       |
|  |                             |               |              | \$3,000            | 2        | parking lot   |
|  | <b>Subtotal Hoey</b>        |               | <b>\$100</b> | <b>\$3,927,326</b> |          |   |
| <b>Jeter Hall</b>                            |                             | <b>21,150</b> |              |                    |          |   |
| elevator                                     |                             |               |              | \$150,000          | 1        | needed for internal accessibility                                     |
| life safety improvements                     |                             |               |              | \$50,000           | 1        | enclosure walls at library  |
| interiors upgrade                            |                             | 21,150        | \$35         | \$740,250          | 2,3      | selective improvements to finishes, lighting & services incl. Toilets |
| present fcaps 1999-2000                      |                             |               |              | \$0                |          | none funded   |
| remaining fcaps, all priorities              |                             |               |              | \$35,000           | 1        | fire alarm & life safety  |
|  |                             |               |              | \$8,000            | 1        | replace domestic water piping   |
|  |                             |               |              | \$75,000           | 3        | roof replacement  |
|  | <b>Subtotal Jeter</b>       |               | <b>\$50</b>  | <b>\$1,058,250</b> |          |   |
| <b>Programmatic and Support</b>              |                             |               |              |                    |          |   |
| <b>Crutchfield Hall</b>                      |                             | <b>13,766</b> |              |                    |          |   |
| extend & reconfigure library                 |                             | 5,506         | \$75         | \$412,980          | 1        | estimated @ 40% of area   |
| roof replacement                             |                             |               |              | \$48,816           | 1        | based on prorated cost at Jeter Hall                                  |
| present fcaps 1999-2000                      |                             |               |              | \$0                |          | none funded   |
| remaining fcaps, all priorities              |                             |               |              | \$13,500           | 1        | life safety/ alarm, exit lighting                                     |
|  | <b>Subtotal Crutchfield</b> |               | <b>\$35</b>  | <b>\$475,296</b>   |          |   |
| <b>Old Gym</b>                               |                             | <b>11,692</b> |              |                    |          |   |
| install air conditioning                     |                             | 11,692        | 30           | \$350,760          | 2,3      |   |
| interior improvements                        |                             | 5,846         | \$35         | \$204,610          | 2,3      | at lockers and pool   |
| present fcaps 1999-2000                      |                             |               |              | \$0                |          | none funded   |
| remaining fcaps, all priorities              |                             |               |              | \$15,500           | 1        | life safety   |
|  |                             |               |              | \$120,000          | 1        | replace obsolete wiring, piping and lighting                          |
|  |                             |               |              | \$21,000           | 2,3      | wall and window repair  |
|  | <b>Subtotal Old Gym</b>     |               | <b>\$61</b>  | <b>\$711,870</b>   |          |   |
| <b>Rondthaler Hall</b>                       |                             | <b>12,765</b> |              |                    |          |   |
| allowance for mothballing during interim     |                             | 12,765        | \$5          | \$63,825           | 1        | measures to protect building during period of non use                 |
| renovate for alternative agency use          |                             | 12,765        | \$100        | \$1,276,500        | 2,3      | following retirement from NCSD use                                    |
| present fcaps 1999-2000                      |                             |               |              | \$0                |          | none funded   |
| remaining fcaps, all priorities              |                             |               |              | \$0                |          | deferred pending re-use decisions                                     |
|  | <b>Subtotal Rondthaler</b>  |               | <b>\$105</b> | <b>\$1,340,325</b> |          |   |
| <b>Underhill Gym &amp; Alumni Field</b>      |                             | <b>22,821</b> |              |                    |          |   |
| roof replacement                             |                             |               | \$9          | \$203,487          | 2,3      | needed within the next three years                                    |
| Upgrades to lockers and showers              |                             |               | \$100        | \$456,420          | 1        | area estimated at 20% of total  |
| Install air conditioning                     |                             |               | \$30         | \$684,630          | 2,3      | desirable   |
| install new elevator between lockers and gym |                             |               |              | \$134,100          | 2,3      | based on Rankin   |
| present fcaps 1999-2000                      |                             |               |              | \$237,800          | 1        | replace interior and exterior bleachers                               |

**CAPITAL IMPROVEMENTS PROJECTION**

*North Carolina School for the Deaf (NCSD)*

*Morganton, NC*

| Building/ Item                  |                                  | sf            | \$/sf       | total              | priority |   |
|---------------------------------|----------------------------------|---------------|-------------|--------------------|----------|---|
| remaining fcaps, all priorities |                                  |               |             | \$74,500           | 1        | roof assessment and repairs   |
|                                 |                                  |               |             | \$31,500           | 1        | fire and life safety alarms and exit lighting                         |
|                                 |                                  |               |             | \$45,000           | 1        | electrical and lighting upgrades                                      |
|                                 |                                  |               |             | \$55,000           | 1        | upgrade toilets   |
|                                 |                                  |               |             | \$ 3,800           | 2        | steam condensate pump   |
|                                 |                                  |               |             | \$50,000           | 2        | exterior repairs  |
|                                 | <b>Subtotal Underhill Gym</b>    |               | <b>\$84</b> | <b>\$1,976,237</b> |          |   |
| <b>Northcott Hall</b>           |                                  | <b>16,766</b> |             |                    |          |   |
| roof replacement                |                                  |               | \$9         | \$150,894          | 2,3      |   |
| present fcaps 1999-2000         |                                  |               |             | \$0                |          |   |
| remaining fcaps, all priorities |                                  |               |             | \$22,500           | 2,3      | exterior doors  |
|                                 |                                  |               |             | \$13,000           | 1        | life safety improvements  |
|                                 |                                  |               |             | \$50,000           | 1        | environmental hazards   |
|                                 | <b>Subtotal Northcott</b>        |               | <b>\$14</b> | <b>\$236,394</b>   |          |   |
| <b>Service Building</b>         |                                  | <b>27,054</b> |             |                    |          |   |
| repair roofing and gutters      |                                  |               | \$10        | \$270,540          | 2,3      | allowance   |
| present fcaps 1999-2000         |                                  |               |             | \$0                |          |   |
| remaining fcaps, all priorities |                                  |               |             | \$145,000          | 1        | upgrade boiler plant equipment  |
|                                 |                                  |               |             | \$48,500           | 1        | life safety upgrades  |
|                                 |                                  |               |             | \$60,000           | 1        | upgrade electrical distribution                                       |
|                                 | <b>Subtotal Service Building</b> |               | <b>\$19</b> | <b>\$524,040</b>   |          |   |
| <b>McCord Student Union</b>     |                                  | <b>16,654</b> |             |                    |          |   |
| interiors upgrade               |                                  |               | \$35        | \$582,890          | 2,3      | selective improvements to finishes, lighting & services incl. toilets |
| present fcaps 1999-2000         |                                  |               |             | \$0                |          |   |
| remaining fcaps, all priorities |                                  |               |             | \$67,000           | 2,3      | roof replacement  |
|                                 |                                  |               |             | \$140,000          | 2,3      | install new air conditioning  |
|                                 |                                  |               |             | \$27,100           | 1        | life safety improvements  |
|                                 |                                  |               |             | \$8,500            | 1        | parking lot   |
|                                 | <b>Subtotal McCord</b>           |               | <b>\$50</b> | <b>\$825,490</b>   |          |   |
| <b>Infirmary</b>                |                                  | <b>12,243</b> |             |                    |          |   |
| interiors upgrade               |                                  |               | \$35        | \$428,505          | 2,3      | selective improvements to finishes, lighting & services incl. toilets |
| present fcaps 1999-2000         |                                  |               |             | \$0                |          |   |
| remaining fcaps, all priorities |                                  |               |             | \$119,500          | 2,3      | central air conditioning to replace window units in older wings       |
|                                 |                                  |               |             | \$65,000           | 2,3      | window replacement  |
|                                 |                                  |               |             | \$13,200           | 1        | life safety and selective lighting improvements                       |
|                                 |                                  |               |             | \$9,500            | 2        | parking lot   |
|                                 | <b>Subtotal Infirmary</b>        |               | <b>\$52</b> | <b>\$635,705</b>   |          |   |
| <b>Chapel</b>                   |                                  | <b>7,238</b>  |             |                    |          |   |
| interiors upgrade               |                                  |               | \$35        | \$253,330          | 2,3      | selective improvements to finishes, lighting & services incl. toilets |
| present fcaps 1999-2000         |                                  |               |             | \$0                |          |   |
| remaining fcaps, all priorities |                                  |               |             | \$13,500           | 1        | life safety and fire alarm  |
|                                 | <b>Subtotal Chapel</b>           |               | <b>\$37</b> | <b>\$266,830</b>   |          |   |

**CAPITAL IMPROVEMENTS PROJECTION**

*North Carolina School for the Deaf (NCSD)*

*Morganton, NC*

| Building/ Item                           |                                  | sf     | \$/sf        | total                     | priority            |   |
|--|----------------------------------|--------|--------------|---------------------------|---------------------|---|
| <b>Administration Buildings</b>          |                                  |        |              |                           |                     |   |
| <b>Superintendent's House</b>            |                                  | 7,495  |              |                           |                     |   |
| moderate interiors improvements          |                                  |        | \$20         | \$149,900                 | 2,3                 | selective improvements to finishes, lighting & services incl. toilets |
| present fcaps 1999-2000                  |                                  |        |              | \$0                       |                     |   |
| remaining fcaps, all priorities          |                                  |        |              | \$7,000                   | 1                   | replace fire alarm  |
|  |                                  |        |              | \$30,000                  | 1                   | replace plumbing pipes  |
|  | <b>Subtotal Superintendent's</b> |        | <b>\$25</b>  | <b>\$186,900</b>          |                     |   |
| <b>Unoccupied Buildings</b>              |                                  |        |              |                           |                     |   |
| <b>Joiner Hall</b>                       |                                  | 20,873 |              |                           |                     |   |
| allowance for mothballing during interim |                                  |        | \$5          | \$104,365                 | 1                   | measures to protect building during period of non use                 |
| renovate for alternative agency use      |                                  |        | \$100        | \$2,087,300               | 2,3                 |   |
| present fcaps 1999-2000                  |                                  |        |              | \$0                       |                     |   |
| remaining fcaps, all priorities          |                                  |        |              | \$0                       |                     | deferred pending re-use decisions                                     |
|  | <b>Subtotal Joiner</b>           |        | <b>\$105</b> | <b>\$2,191,665</b>        |                     |   |
| <b>Goodwin Hall</b>                      |                                  | 18,400 |              |                           |                     |   |
| allowance for mothballing during interim |                                  |        | \$5          | \$92,000                  | 1                   | measures to protect building during period of non use                 |
| renovate for alternative agency use      |                                  |        | \$100        | \$1,840,000               | 2,3                 |   |
| present fcaps 1999-2000                  |                                  |        |              | \$0                       |                     |   |
| remaining fcaps, all priorities          |                                  |        |              | \$0                       |                     | deferred pending re-use decisions                                     |
|  | <b>Subtotal Goodwin</b>          |        | <b>\$105</b> | <b>\$1,932,000</b>        |                     |   |
| <b>Cattle Barn</b>                       |                                  | 10,296 |              |                           |                     |   |
| upgrade for recreational use             |                                  |        | \$75         | \$772,200                 | 2,3                 | major activity space, climbing wall, etc.                             |
| present fcaps 1999-2000                  |                                  |        |              | \$0                       |                     |   |
| remaining fcaps, all priorities          |                                  |        |              | \$50,000                  | 1                   | roof replacement  |
|  | <b>Subtotal Cattle Barn</b>      |        | <b>\$80</b>  | <b>\$822,200</b>          |                     |   |
| <b>Site Improvements Campus Wide</b>     |                                  |        |              |                           |                     |   |
| lighting, walks and signage              |                                  |        |              | \$150,000                 | 2,3                 | allowance for selective improvements                                  |
| remaining fcaps, all priorities          |                                  |        |              | \$88,500                  | 1                   | parking and drives  |
|  |                                  |        |              | \$231,800                 | 1                   | repair campus buildings for termite damage                            |
|  |                                  |        |              | \$17,000                  | 1                   | upgrade campus lighting   |
| capital requests for 1999                |                                  |        |              | \$30,000                  | 1                   | campus water distribution study                                       |
|  |                                  |        |              | \$285,500                 | 1                   | repair & renovate steam and domestic water piping system              |
|  |                                  |        |              | \$25,000                  | 1                   | ADA accessibility improvements  |
|  |                                  |        |              | \$90,000                  | 1                   | survey utilities infrastructure and assess                            |
|  | <b>Subtotal Campus Wide</b>      |        |              | <b>\$917,800</b>          |                     |   |
| <b>Total Campus</b>                      |                                  |        |              | <b>\$27,178,366</b>       |                     |   |
|  |                                  |        |              | <b>priority 1</b>         | <b>\$4,862,532</b>  | must be funded for present needs                                      |
|  |                                  |        |              | <b>priority 2 &amp; 3</b> | <b>\$10,094,534</b> | desirable improvements  |
|  |                                  |        |              | <b>re-use by others</b>   | <b>\$12,221,300</b> | needed to prepare for re-use by others                                |

**CAMPUS DESCRIPTION**

**Overview**

**Residential/Classroom Buildings**

**Programmatic and Support Buildings**

**Administration Buildings**

**FINDINGS**

**Overview**

**Residential/Classroom Buildings**

**Programmatic and Support Buildings**

**Administration Buildings**

**Building Systems**

**CONCLUSIONS/RECOMMENDATIONS**

**CAPITAL IMPROVEMENT PROJECTS**

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**CAMPUS DESCRIPTION - Residential / Classroom Buildings****Eastern North Carolina School for the Deaf (ENCSD)****Wilson, NC****Overview***Howard Pre-School at Eagles***Eagles Hall**

|                             |      |
|-----------------------------|------|
| <i>Date of Construction</i> | 1965 |
|-----------------------------|------|

|                 |   |
|-----------------|---|
| <i>Floor(s)</i> | 1 |
|-----------------|---|

|                     |        |
|---------------------|--------|
| <i>Sq.Ft. (gsf)</i> | 51,537 |
|---------------------|--------|

Eagles is a one-story, modern style building combining residential space and classroom functions for younger Elementary School children. The building has residential wings at either end of the complex, one for boys



Located at the site of a former public health facility, ENCSD's campus is comprised of a half-dozen major buildings of different ages and conditions dating from the 1940's, 1960's, 1970's, 1980's and late 1990's.

The 50-acre campus has seven major stand-alone or multiple-wing buildings, totaling over 266,000 gsf of building capacity. Buildings are mostly red-brick masonry construction and mostly one or two story.

The ENCSD campus is part of a larger multi-purpose "mega-campus" of contiguous public institutional facilities, including corrections, juvenile services and higher education. It is located near suburban shopping and transportation routes.

The total residential student population is 186, with 127 students and 59 day students.



and one for girls, connected by a main through corridor which functions as the primary connector for building functions. The central section houses classrooms, the kitchen/cafeteria and a small gymnasium. The building also contains staff offices, therapy rooms, an infirmary, multi-activity rooms and lounges.

**CAMPUS DESCRIPTION - Residential / Classroom Buildings*****Eastern North Carolina School for the Deaf (ENCSD)******Wilson, NC***

The residential area has multiple occupancy rooms (up to 8 beds per room). Partial height partitions have been installed in the originally open bedroom area in order to provide some privacy for occupants who each have a cubicle.

Eagles' interior is generally bright and attractive despite its painted concrete block construction. The attractiveness is due partially to its carpeting, high ceilings and plentiful natural light which enters through rooftop skylights which occur in the corridors and elsewhere. It is air conditioned and generally comfortable.

***Eagles Hall******McAdams Hall****Date of Construction*      1971*Floor(s)*                      2*Sq.Ft.(gsf)*                  84,743

McAdams Hall is a large multi-level complex for High School children. Dormitories and some classrooms are located in separate wings. These are situated around a central core that contains more classrooms, dining/kitchen, offices and activities spaces. At the central entry, where the major corridors meet, there is an interior courtyard and main stairway.

McAdam also contains an auditorium/theatre with a stage and backstage facilities, a full-size gym with spectator seating and a full-sized pool (pending repairs). New training and locker rooms and a handicapped accessible entrance were added in 1997. These locker rooms are convenient to the ample outdoor recreation facilities, including several playing fields and a regulation track.



**CAMPUS DESCRIPTION - Residential / Classroom Buildings****Eastern North Carolina School for the Deaf (ENCSD)****Wilson, NC****Vestal Hall***Date of Construction*      1969*Floor(s)*                      2*Sq.Ft. (gsf)*                62,986

Vestal Hall is the Middle School residential and classroom building, consisting of several attached structures. Dormitories (Middle School girls) are located in a separate wing. The core portion of the building contains a full-height gymnasium (non-regulation size) plus classroom and support facilities including the North Carolina Information Highway facility. This is an interactive video-conferencing site that is part of a statewide system. The facility also houses the computer servers for the campus network which includes fiber optic connections to all buildings on campus.

**Vestal Hall**

An Independent Living Center (apartment-style dormitory) is located in the oldest wing (once part of the original public health facility and renovated several times since). The independent living units provide single occupancy bedrooms with a kitchen and bathroom area shared by each pair of bedrooms. The unit can house 25 students.



**CAMPUS DESCRIPTION - Residential / Classroom Buildings****Eastern North Carolina School for the Deaf (ENCSD)****Wilson, NC****The Howard PreSchool***Date of Construction :* 1989*Floor(s):* 1*Sq. Ft. (gsf)* 1,500

This mobile-component factory-built classroom building is located on a brick foundation behind Eagles and is reserved for Pre-School students.

**Massey Activity Center***Date of Construction* 1996*Floor(s)* 2*Sq.Ft. (gsf)* 27,354

Massey Activity Center is a new, highly-attractive, 2-story, multi-use building containing a 300+-seat auditorium, state-of-the-art multimedia projection, a closed circuit communications and media center, state-of the art library, and student center with game rooms, lounge, meeting rooms and cafeteria. The Center is fully handicap-accessible and is conveniently located at the center of the campus.



Massey is an impressive and engaging building which is also welcoming and accessible. The auditorium occupies a major section of the ground floor and upper floor, offering high tech communication services for the deaf community including large screen video on each side of the stage for simultaneous interpretation of presentations. Closed circuit video connections are provided to all classrooms for communications and for emergency warning notices.

## ***CAMPUS DESCRIPTION - Administration Building***

***Eastern North Carolina School for the Deaf (ENCSD)***

***Wilson, NC***



***Massey Activity Center***

The student union offers short order food service, vending and snacks and a gathering space. Adjacent is an activity center that will open soon and provide games and other informal activities. The library, reached via the atrium entranceway and elevator accessible, is an impressive facility with an array of bookshelves for the collection of reference volumes, periodicals and books. Also provided are reading areas, study carrels and computer workstations for researching the collection and for access to other library sites.

### ***Mayfield Hall***

*Date of Construction*      1969

*Floor(s)*                      1

*Sq.Ft.(gsf)*                  6,937

Mayfield Hall, built at the same time as Vestal Hall, contains science, math, computer and vocational/technical classrooms and workshops.



### ***Alford Building***

*Date of Construction*      1981

*Floor(s)*                      1

*Sq.Ft.(gsf)*                  12,329

Alford Vocational Building is a plain, flat-roofed, industrial-type building with through-wall-unit air conditioning and some rooftop AC and ventilation units. Vocational training facilities in Alford include vocational classrooms, carpentry, paint shop, cabinetry and furniture making, auto engineering and repair, and home economics.



## ***CAMPUS DESCRIPTION - Administration Building***

***Eastern North Carolina School for the Deaf (ENCSD)***

***Wilson, NC***

### ***Main Kitchen***

#### ***(part of Vestal Complex)***

*Date of Construction*                      1969

*Floor(s)*    2

*Sq.Ft.(gsf)*                                      62,986

The Main Kitchen, attached to Vestal, is the main food preparation area for the campus and also serves as the central warehousing area for food supplies. Smaller satellite kitchens around the campus handle small meals, snacks and serving functions.



A small maintenance office, garage/shed and loading docks are located around and under the Central Kitchen and Vestal's gymnasium.

### ***Woodward Hall***

*Date of Construction*                      1941

*Floor(s)*    2

*Sq.Ft.(gsf)*                                      17,263

Woodard Hall, and a portion of Vestal Hall complex (independent living units wing) are the original (identical) buildings which date back to the original public health hospital. Barracks-type open wards have been subdivided and large open-air porches have been closed-in. Woodard houses the central administration, other offices and conference rooms. The building is a steel frame structure with a masonry exterior.



**FINDINGS*****Eastern North Carolina School for the Deaf (ENCSD)******Wilson, NC*****Overview**

ENCSD is an attractive and generally well-maintained campus. Its buildings are generally close together and are convenient for pedestrian access. Access between buildings for persons with disabilities is fair.

The ENCSD campus has received major investment in each of the last four decades. Because many of its buildings were built at different dates, there is a wide range in age and condition of buildings. Some are older and in need of renovation, others are state-of-the-art.

Campus-wide, there are three areas of moderate physical plant needs, depending upon the building in question:

- 1) repair/replacement needs,
- 2) upgrade of safety systems, ADA issues, HVAC and controls,
- 3) layout of residential dormitories.

Needed repair/replacement/upgrade highlights include: windows, roofs, alarm/communications systems, hardware, HVAC controls, and handicapped access.

**Residential/Classroom Buildings**

Like the other State school campuses, residential and dormitory room layouts and conditions, range from fair to poor. There are consistent problems with student privacy, storage, staff supervision, quality of finishes and HVAC. Dormitories have consistently poor handicapped access in all baths and non-compliant hardware throughout.

**Eagles**

Eagles has received some extensive repairs and appears in generally good condition overall.

The residential area has multiple occupancy rooms (8 beds per room) within which partial-height partitions have been installed. These partitions create "cubicles" which provide some privacy and personal storage for occupants. Although desirable, these open bedrooms cannot effectively be fully and permanently subdivided into separate bedrooms if the design capacity (8 per room) is to be maintained. This is due to the room's configuration, the window layout, and minimum dimensional standards for bedrooms.

A downsizing of design capacity would allow permanent subdivision of these large bedrooms. The air conditioning system in each room would have to be extensively modified to accomplish this goal.

**FINDINGS**

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***Eastern North Carolina School for the Deaf (ENCSD)******Wilson, NC***

The current partial-height partitions are faced with acoustically absorptive material which improves acoustics somewhat, but the space is still noisy when fully occupied. Other finishes are non-absorptive (painted concrete, concrete block, and vinyl tile floors) and contribute to the noisiness as well. The low occupancy at ENCSD mitigates this noisiness by reducing the number of occupants per room. The hallway, although light and pleasant, is particularly reverberant and noisy.

The bathrooms, although numerous (near bedrooms and within many classrooms) are largely non-compliant with handicapped access codes. The dorm area is served by shared toilet rooms between each pair of sleeping rooms. The toilet room finishes and fixtures are in need of some minor upgrading. Handicapped accessibility is the major issue overall.

Classrooms are mostly carpeted, pleasant, and more reasonable acoustically. Toilets are provided in the classroom area but need improvements: finishes, fixtures and handicapped access.

The cafeteria is a bright and pleasant space.

A new roof and skylights are installed in 1998. Its original windows (aluminum non-insulated) require replacement.

A heating system replacement (circulating hot water) is currently funded. The central chiller is in poor shape and is planned to be replaced in currently funded projects. Cooling is via fan coil units located below the windows which are in turn served by chillers (2) located in equipment spaces within the building. The HVAC system relies upon operable windows for fresh air makeup. Eagles is currently funded for upgrade of several components of its HVAC, but this funding does not cover all of the required work.

**McAdams**

McAdams overall shows substantial wear-and-tear and is in need of many new finishes.

The dormitory areas contain multiple-occupancy bedrooms similar to Eagles and these bedrooms share similar privacy and acoustical issues.

Central toilet and shower facilities are provided on the residential floors. The toilets are presently adequate but need to be upgraded for accessibility. Hard wear and tear, such as damaged toilet partition doors and damaged ceiling tiles, was evident upon inspection. Beyond the needed repair and replacement, this wear-and-tear indicates the need for more hardy systems.

Many classrooms have acoustic treatment, with carpeting on the floor and sound absorbent materials on some portion of walls and ceilings.

**FINDINGS**

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***Eastern North Carolina School for the Deaf (ENCSD)******Wilson, NC***

McAdams has a masonry exterior with terrazzo floors in major hallways. Many floors are covered by vinyl asbestos tile (VAT) and are at risk for expensive abatement and removal in the future. The VAT is in reasonable shape at the moment.

Roofing is presently funded for replacement.

Windows are single pane aluminum frame, non-insulated casement/venting units, out of date, and generally in poor condition. Hardware to replace worn out components is no longer readily available except through salvage. They are energy-inefficient and in need of replacement.

The heating and air conditioning system is a patchwork of semi-functional system components that have been creatively supported and repaired but are in serious need of replacement. The change-over from heating to cooling is not automatic but must be done manually. Some HVAC improvements are presently funded.

Ceilings in public areas are in poor condition and require replacement.

The single handicapped-person vertical lift, which bridges the building's multiple levels, is a good solution but should be augmented with a standard commercial elevator.

The pool in the attached Athletic Center does not meet new safety requirements. The pool cleaning and filtration system needs to be retrofitted with safety devices to prevent the possibility of injury to users at the suction pump inlets.

**Vestal**

Vestal shares similar problems as the other dormitory/classroom buildings. Its roof requires replacement as soon as possible.

The air conditioning system, although in better shape than McAdams, does require some adjustment of components (chiller and piping) for good long term service: system components for the cooling system need to be re-sized to function efficiently together, and chilled water piping needs to be coordinated with chiller demand and sizing.

The Independent Living Center in the Vestal complex is located within one of the original 1940's buildings. It is divided into several apartments in a renovation that appears cost effective but which could be improved.

The tile in certain classrooms and halls may be asbestos-containing and should be tested and removed, if found to contain asbestos.

Some settlement is evident at the intersection of the older building and the 1969 building. This should be evaluated but does not appear problematic at present.

Like McAdams, the windows are outdated, single pane aluminum frame units, in poor condition and need replacement.

**FINDINGS*****Eastern North Carolina School for the Deaf (ENCSD)*  
The Howard PreSchool*****Wilson, NC***

Approximately 10 years old and in relatively good condition, this building was not inspected.

**Programmatic and Support**

Overall, campus-wide program and support areas are in good condition and ample in volume. Certain campus activity assets appear underutilized, compared to demand created by a relatively small student population.

**Massey Center**

Massey Center is brand new and in fine condition. Students and faculty are very proud of this first rate facility.

**Mayfield**

Mayfield requires replacement windows and safety alarms overall. Its highest priority is roof replacement. The through-the-wall air conditioning system provides insufficient ventilation at the science classroom for use as a laboratory teaching facility.

**Alford**

Alford's roof is in poor repair and requires repair or replacement.

**Main Kitchen**

Suspended ceilings in the main kitchen are in poor repair and need replacement. Wood doors were damaged in some places. HVAC upgrades are desired to provide some spot cooling in the food preparation area.

**Athletic Center**

This relatively new building is in good condition. The pool does not meet new safety requirements and is currently closed for use. The pool cleaning and filtration system needs to be retrofitted with safety devices to prevent the possibility of injury to users at the suction pump inlets.

**Maintenance Shop**

The Maintenance Shop, maintenance headquarters office and related storage at Vestal is undersized and should be relocated and/or allowed to expand to other underutilized space on campus.

**FINDINGS***Eastern North Carolina School for the Deaf (ENCSD)**Wilson, NC***Administration Buildings****Woodard**

Woodard is reasonably serviceable as an administrative and office facility. The air conditioning system is in reasonably good condition. The HVAC controls need upgrading: the heating controls are somewhat inadequate but workable, and the thermostat zones are too large. The windows have already been replaced with energy-efficient double-glazed combination units. Several flat roof areas are at risk and need repair/replacement. In planned upgrades, the fire alarm will be replaced and emergency lighting installed. Storage space is tight (a common problem in most office renovations).

**Building Systems**

Site infrastructure and utility systems: Boilers, chillers, utility distribution, and controls need replacement. These items have excellent pay back periods (under five years).

HVAC system upgrades and replacements in various buildings are essential to residential comfort and energy efficiency. This includes distribution, air handling and temperature controls. The priorities are Eagles and McAdams Halls (residential and classroom buildings) but there are substantial problems in most other buildings. Installation of a campus-wide energy management and control system should be evaluated.

Windows: Non-insulated aluminum and steel windows throughout the campus have broken hardware, are inoperable, and are extremely energy-inefficient. Replacement of these windows will provide significant energy savings as well as comfort and esthetic improvement. Residential buildings Eagles and McAdams should be first priority.

Roofs are leaking and in need of repair or full replacement in several buildings on the campus. Several roofs are flat and may benefit from being rebuilt with a pitch. Campus staff have identified two priority roofs totaling 37,000 sf (Vestal and Mayfield Halls).

Environmental Hazards: There is an apparent presence of asbestos in floor tile in certain interiors and in insulation on utility lines.

**Code Compliance, Repair, Replacement and Upgrade**

Safety alarm and detection systems at ENCSD have been upgraded to meet minimal life-safety standards but are still sub-standard for a specialized deaf and hard-of-hearing population. Improvements to these life safety systems should be systematically evaluated for every campus building.

Disability access issues are present throughout the campus, mostly in the form of problematic hardware, interior vertical access, and bathroom layouts. There is generally good ADA site access via on grade access and ramps. A systematic survey of these code issues should be performed and accurate cost estimates developed. Roads are in fair condition.

**CONCLUSIONS AND RECOMMENDATIONS***Eastern North Carolina School for the Deaf (ENCSD)**Wilson, NC*

- 1. Most buildings and systems at the ENCSD require a moderate amount of repair, replacement and upgrade without extensive delay.**

Many of ENCSD's buildings are twenty to thirty years old or older, and have not received substantial upgrades during their lifetime. Other buildings are newer or have been improved, but these improvements have only been partial.

Overall, the campus is in fair to good condition but requires a moderate level of repair, replacement and upgrade in the areas of HVAC systems and controls, roofs, bathrooms, fire safety and alert systems, and ADA.

The list of necessary improvements is generally well-documented at the campus and state administrative level and is currently subject to budgetary prioritization. These improvements are much-needed and should be performed as soon as is feasible.

- 2. Dormitory areas throughout the campus should be studied and considered for correction of consistent problems with privacy, finishes and furnishings, non-accessible baths, alert systems and difficult night-time supervision by staff.**

Many of these improvements may be low-cost, some will improve safety, and others, like bathroom upgrades, are expensive but will have a substantial effect on the quality of life in the dormitories. The smaller number of students on campus (much less than original design capacity) allows for substantial redesign to accommodate privacy needs of students as well as the supervision requirements of 24-hour staff.

- 3. ENCSD has received significant investment in each of the past four decades in the form of new residential and program buildings. Once ENCSD's older buildings and campus-wide systems are upgraded, this campus will become an excellent long-term capital asset.**

- 4. To the extent that the size of ENCSD's residential population remains low or continues to shrink, ENCSD's campus represents a significantly underutilized asset.**

Although the campus has major repair and replacement needs and problems with the condition and layout of its residential areas, ENCSD is an overall well-rounded campus with excellent educational and programmatic amenities. As such, ENCSD represents an important capital asset to the State's system of education and human service agencies.

- 5. ENCSD's physical plant assets could serve as educational, programmatic and recreational resources for the greater community. The Massey Activity Center, in particular, is an excellent investment and could serve as a resource beyond ENCSD's residential deaf and hearing community.**

Massey's high quality library, large theatre, multi-media center, student cafeteria, conference room, lounge and full handicap accessibility offers many opportunities for developing programming for the non-residential deaf community, as well as other community educational uses. Use by external entities could possibly generate fee revenue.

**CONCLUSIONS AND RECOMMENDATIONS*****Eastern North Carolina School for the Deaf (ENCSD)******Wilson, NC***

In addition to Massey, there are three large gyms, a full-size pool (pending repairs), playing fields, auditorium with a stage, vocational workshops for woodworking and automotive, and substantial room for conferences and other events. With careful scheduling, the volume of activity space available is greater than is required by school operations for a resident population of this size. This presents possible opportunities to leverage local community school and business uses.

- 6. ENCSD's proximity to other large public institutions warrants further analysis of possible compatibility for shared services or assets.**

ENCSD's plan to consolidate dietary functions from three kitchens to one central, modern kitchen should lower operating costs and increase efficiency. Other food-service production options should also be considered, such as off-site, multi-institutional shared production, or on-site but contracted-out food service.

- 7. Better utilization of this real estate asset should be the focus of a regional interagency planning effort staffed by state agency representatives who are responsible for identifying the long range facility needs of their respective agencies.**

- 8. Appropriate design and engineering expertise should be sought.**

Issues about hardware, HVAC controls, Handicapped (HP) access, and dormitory layout are relatively non-complex but contain many details and are not effectively tackled on a piecemeal basis. The State should acquire design and engineering assistance to focus on each of these issues in a systematic campus-wide, non-piecemeal approach.

## ***CAPITAL IMPROVEMENTS PROJECTION***

***Eastern North Carolina School for the Deaf (ENCSD)***

***Wilson, NC***

### **Introduction**

Capital Improvements Projections were prepared based on the following activities and information.

1. **Site visits:** The study team met with administration and facility representatives at each of the campuses to discuss facility issues including known systems, safety and functional deficits, and likely future improvements. The study team then walked through each of the major buildings with facility representatives in order to observe the physical and functional conditions and to hear firsthand from those most directly knowledgeable of facility conditions.
2. **Information Gathering and Assessment:** The Study team then compiled a list of issues for each of the campuses and compared specific items to fcap reports for the campuses to determine what may already be funded or in line for future funding. The remaining items were then compiled and put into categories for calculation of likely funding levels.
3. **Capital Improvements Projection:** The team then prepared a spreadsheet for each campus listing by building: the present fcaps for 1999-2000, remaining fcaps for all priority categories, and other needs determined during the site visit, thereby preparing a projection of capital cost needs for each of the buildings to address facility needs noted.

The projections include construction costs for buildings and fixed equipment and do not include soft costs such as fees, furnishings, signage and movable equipment. Soft costs may add as much as 30% to 40% to the total depending upon the type and complexity of the project. The estimates for work not included in fcap listings were prepared without the benefit of floor plans which had not been compiled particularly for the older buildings where the anticipated work was most intensive. As a result, rules of thumb were used for projection purposes, for percentage of residential area within an overall building for example. In this way, the team arrived at areas to which \$/sf could be applied to arrive at a construction cost for the improvement. By applying equivalent methodologies to each campus' facility needs, a cost comparison of each campuses needs vis a vis others was developed. This is a preliminary effort to project the costs based on limited information. Actual values may differ when a more detailed study is conducted, yet the relative costs at each campus included here offer a valid picture of comparative capital needs.

# CAPITAL IMPROVEMENTS PROJECTION

Eastern North Carolina Schools for the Deaf (ENCSD)

Wilson, NC

- priorities:
1. immediate / must be funded to present needs
  2. desirable / would improve present conditions
  3. long term / consider funding in 3- 5 years

| Building/ Item                            |                         | sf            | \$/sf       | total              | priority |  |
|---|-------------------------|---------------|-------------|--------------------|----------|--|
| <b>Residential / Classroom Buildings</b>  |                         |               |             |                    |          |  |
| <b>Eagles Hall</b>                        |                         | <b>51,537</b> |             |                    |          |  |
| renovation residential areas <sup>1</sup> |                         | 23,192        | \$100       | \$2,319,165        | 2,3      | estimated at 45% of total building                         |
| improve classroom area finishes           |                         | 5,798         | \$30        | \$173,937          | 2,3      | estimated at 25% of total building                         |
| replace air conditioning system           |                         | 51,537        | \$30        | \$1,546,110        | 1        |  |
| present fcaps 1999-2000                   |                         |               |             | \$487,100          | 1        | replace heating system                                     |
|   |                         |               |             | \$245,394          | 1        | replace windows (prorated per sf in joint fcap w/ McAdams) |
| remaining fcaps, all priorities           |                         |               |             | \$133,500          | 2,3      | miscellaneous exterior and systems repairs                 |
|   | <b>Subtotal Eagles</b>  |               | <b>\$95</b> | <b>\$4,905,206</b> |          |  |
| <b>McAdams Hall</b>                       |                         | <b>84,743</b> |             |                    |          |  |
| renovation residential areas <sup>1</sup> |                         | 38,134        | \$100       | \$3,813,435        | 2,3      | estimated at 45% of total building                         |
| improve classroom area finishes           |                         | 9,534         | \$30        | \$286,008          | 2,3      | estimated at 25% of total building                         |
| replace air conditioning system           |                         | 84,743        | \$30        | \$2,542,290        | 1        |  |
| update finishes in public areas           |                         | 25,423        | \$30        | \$762,687          | 1        | estimated at 30% of total building                         |
| present fcaps 1999-2000                   |                         |               |             | \$403,506          | 1        | replace windows (prorated per sf in joint fcap w/ Eagles)  |
| remaining fcaps, all priorities           |                         |               |             | \$62,950           | 2,3      | miscellaneous exterior and systems repairs                 |
|   | <b>Subtotal McAdams</b> |               | <b>\$93</b> | <b>\$7,870,876</b> |          |  |
| <b>Vestal Hall</b>                        |                         | <b>62,986</b> |             |                    |          |  |
| selective residential upgrades            |                         | 18,896        | \$75        | \$1,417,185        | 2,3      | estimated at 30% of total building                         |
| selective ac system improvements          |                         | 62,986        | \$10        | \$629,860          | 1        |  |
| update finishes in public areas           |                         | 18,896        | \$30        | \$566,874          | 1        | estimated at 30% of total building                         |
| update & add to facility engineering      |                         | 4,000         | \$75        | \$300,000          | 2,3      |  |
| present fcaps 1999-2000                   |                         |               |             | \$1,167,500        | 1        | food service improvements                                  |
|   |                         | 30,509        |             | \$257,460          | 1        | roof repair (prorated per sf in joint fcap w/ Mayfield)    |
| remaining fcaps, all priorities           |                         |               |             | \$462,400          | 2,3      | miscellaneous exterior and systems repairs                 |
|   | <b>Subtotal Vestal</b>  |               |             | <b>\$4,801,279</b> |          |  |

**CAPITAL IMPROVEMENTS PROJECTION**

*Eastern North Carolina Schools for the Deaf (ENCSD)*

*Wilson, NC*

| Building/ Item                            |                             | sf            | \$/sf | total                       | priority           |   |
|---|-----------------------------|---------------|-------|-----------------------------|--------------------|---|
| <b>Programmatic and Support Buildings</b> |                             |               |       |                             |                    |   |
| <b>Massey Activity Center</b>             |                             | <b>27,354</b> |       |                             |                    |   |
| no capital improvements needed            |                             |               |       |                             |                    |   |
| <b>Mayfield Hall</b>                      |                             | <b>6,937</b>  |       |                             |                    |   |
| window replacement                        |                             | 6,937         | \$5   | \$33,082                    | 1                  | prorated at Eagles/ McAdams prices                        |
| selective ac improvements                 |                             | 694           | \$30  | \$20,811                    | 1                  | provide adequate ventilation at science classroom         |
| present fcaps 1999-2000                   |                             |               |       | \$31,350                    | 1                  | roof repair (prorated per sf in joint fcap w/ Vestal)     |
| remaining fcaps, all priorities           |                             |               |       | \$81,000                    | 2,3                | miscellaneous exterior and systems repairs                |
|   | <b>Subtotal Mayfield</b>    |               |       | <b>\$166,243</b>            |                    |   |
| <b>Alford Hall</b>                        |                             | <b>12,329</b> |       |                             |                    |   |
| roof repair/replacement                   |                             | 12,329        | \$4   | \$50,396                    | 1                  | prorated at Vestal/Mayfield prices                        |
| remaining fcaps, all priorities           |                             |               |       | \$8,000                     | 1                  | miscellaneous exterior and systems repairs                |
|   | <b>Subtotal Alford</b>      |               |       | <b>\$58,396</b>             |                    |   |
| <b>Administration Building</b>            |                             |               |       |                             |                    |   |
| <b>Woodard Hall</b>                       |                             | <b>17,263</b> |       |                             |                    |   |
| partial roof replacement                  |                             | 3,453         | \$4   | \$14,113                    | 1                  | flat roof areas @ 20% of total sf                         |
| heating systems controls upgrade          |                             | 17,263        | \$5   | \$86,315                    | 1                  |   |
| present fcaps 1999-2000                   |                             |               |       | \$0                         |                    |   |
| remaining fcaps, all priorities           |                             |               |       | \$383,000                   | 2,3                | fire alarm, hvac and plumbing systems repair/ replacement |
|   | <b>Subtotal Woodard</b>     |               |       | <b>\$483,428</b>            |                    |   |
| <b>Site Improvements Campus Wide</b>      |                             |               |       |                             |                    |   |
| lighting, walks and signage               |                             |               |       | \$150,000                   | 2,3                | allowance for selective improvements                      |
| remaining fcaps, all priorities           |                             |               |       | \$90,852                    | 1                  | parking and drives  |
|   |                             |               |       | \$4,000                     | 1                  | campus wide systems                                       |
|   |                             |               |       | \$15,000                    | 1                  | ADA accessibility   |
|   | <b>Subtotal Campus Wide</b> |               |       | <b>\$259,852</b>            |                    |   |
| <b>Total Campus</b>                       |                             |               |       | <b>\$18,545,280</b>         |                    |   |
|   |                             |               |       | <b>priority<sup>1</sup></b> | <b>\$8,962,700</b> | must be funded for present needs                          |
|   |                             |               |       | <b>other priorities</b>     | <b>\$9,582,580</b> | desirable and long term 3-5 years                         |

<sup>1</sup> Re-do residential areas: downsize occupancy to present need; reconfigure areas to provide single occupancy private bedrooms; reconstruct toilet rooms for accessibility and durability.

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*Central North Carolina Schools for the Deaf (CNCSD)*

*Greensboro, NC*

**CAMPUS DESCRIPTION**

**Overview**

**Residential Buildings**

**Educational Buildings**

**Programmatic & Support Buildings**

**Administration Buildings**

**FINDINGS**

**Overview**

**Residential Buildings**

**Educational Buildings**

**Programmatic and Support**

**Administration Buildings**

**Campus-wide Code Compliance, Repair, Replacement and Upgrade**

**CONCLUSIONS/RECOMMENDATIONS**

**CAPITAL IMPROVEMENT PROJECTIONS**

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## ***CAMPUS DESCRIPTION- Overview***

***Central North Carolina Schools for the Deaf (CNCSD)***

***Greensboro, NC***

### **Overview**

Founded and constructed in 1977 as a self-contained residential school for the deaf and hard-of-hearing.

Approximately 75-acre campus; 147,000 gsf of building capacity.

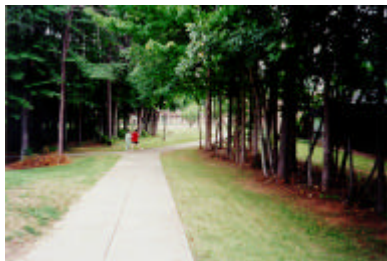
Pleasant, secluded, 8-building campus approached by an attractive winding drive and nestled within a landscaped forest setting.



Perimeter loop drive and perimeter parking with extensive walkways connecting all buildings, resembles a small college campus environment.

Five major dormitory, classroom and administration buildings (built 1977), one or 1.5-story in height, plus separate gymnasium (1980), kitchen and maintenance buildings. Most buildings are red brick with "contemporary" roof-lines and window design.

The total number of students is 82, including 46 residential students and 36 day students.



**CAMPUS DESCRIPTION - Residential Buildings****Central North Carolina Schools for the Deaf (CNCSD)****Greensboro, NC**

All residential accommodations are provided in two almost identical dormitory buildings (Mehl Hall and Brown Hall, 32,000 gsf each). Each building consists of three dormitory "pods" situated around a core which includes lobby, kitchen/cafeteria, canteen, lounge, play and activity areas. Each building also has approximately six or more one-room apartments with two half baths. These apartments were originally designed for residential staff and overnight family visit, and as training suites for developing independent living skills. Four apartments per building are currently reserved for family guests or for staff seeking permanent housing. Mehl also has a small indoor pool (out of use for two years pending moderate repairs to filtration pumps) and infirmary.

**Brown Hall**

|                             |        |
|-----------------------------|--------|
| <i>Date of Construction</i> | 1975   |
| <i>Floor(s)</i>             | 1      |
| <i>Sq.Ft. (gsf)</i>         | 32,223 |

Each of the three dormitory "pods" consists of four "bedroom suites". The four suites surround a core of two open living rooms with television, entertainment and learning/reading areas and an enclosed mechanical room. Each bedroom suite consists of two large bedrooms with up to four beds per bedroom. A gang bathroom serves each bedroom suite. Brown has one extra bedroom suite.

The total residential design capacity is approximately 190-200 students (based on: two dormitory buildings, three pods per building, four bedroom suites per pod, up to eight beds per bedroom suite). There is additional capacity for 15 or so additional residential students or adults.

**Mehl Hall**

|                             |        |
|-----------------------------|--------|
| <i>Date of Construction</i> | 1975   |
| <i>Floor(s)</i>             | 1      |
| <i>Sq.Ft. (gsf)</i>         | 31,959 |

**CAMPUS DESCRIPTION - Educational Buildings****Central North Carolina Schools for the Deaf (CNCSD)****Greensboro, NC**

Paired nearby with each dormitory building is a 16,000 gsf, 1 1/2 story classroom building (Dixon and Phillips-Payne).

Nearly identical, each of these structures contain eight to ten large and small classrooms, library, art room, science classroom, meeting room, teacher break-room, book storage, etc.

Both buildings have very large, attractive and airy double-height classrooms with windows on three walls and an observation balcony.

***Dixon Building***

*Date of Construction*      1975  
*Floor(s)*                              1  
*Sq.Ft. (gsf)*                      16,063

***Phillips-Payne***

*Date of Construction*      1975  
*Floor(s)*                              1  
*Sq.Ft. (gsf)*                      17,031

**CAMPUS DESCRIPTION - Programmatic and Support Buildings****Central North Carolina Schools for the Deaf (CNCSD)****Greensboro, NC*****Simpson -Williams******Physical Education******Building****Date of Construction*      1980*Floor(s)*                      1*Sq.Ft. (gst)*                15,270

*front entrance (above) faces the campus center.*

The **Simpson-Williams** Physical Education Building contains a full size gym and stage, and stands alone at the edge of the Campus.



*rear entrance*

**CAMPUS DESCRIPTION - Programmatic and Support Buildings****Central North Carolina Schools for the Deaf (CNCSD)****Greensboro, NC****Maintenance /****Storage***Date of Construction*      1977*Floor(s)*                      1*Sq.Ft. (gst)*                7,603*Maintenance Building showing loading dock. Notice vertical wood exterior.***Central Kitchen***Date of Construction*      1975*Floor(s)*                      1*Sq.Ft. (gst)*                4,293*Central kitchen showing loading dock.*

**CAMPUS DESCRIPTION - Administration Building***Central North Carolina Schools for the Deaf (CNCSD)**Greensboro, NC***Hall - Mericka****Administration****Building***Date of Construction*      1975*Floor(s)*                      1*Sq.Ft. (gst)*                16,222

Most administration and office space is located at **Hall-Mericka** Administration Building including large and small meeting rooms.

**FINDINGS***Central North Carolina Schools for the Deaf (CNCSD)**Greensboro, NC***Overview**

This is an attractive and generally well-maintained campus.

Most building interiors are attractive and comfortable. Exteriors are in good condition, pending certain planned improvements. All buildings were built at the same time (1977-80) and are in similar (good) condition.

Campus-wide, there are three areas of minor-to-moderate physical plant needs:

- 1) repair/replacement needs,
- 2) upgrade of safety systems, ADA issues, HVAC and controls,
- 3) layout of residential dormitory areas (minor).

Upgrade needs include alarm/communications systems, hardware, HVAC controls, handicapped access.

Repair/replacement needs include: windows, roofs, exterior fascia/soffits.

Windows are wood-framed, energy-inefficient. They are deteriorating and in need of replacement. Many have been replaced with clad, double-panel energy efficient units.

Certain roofs were poorly designed, are at the end of their useful life, and are in need of replacement. Some have been replaced and additional work is planned.

Exterior plywood fascia/soffit panels have reached the end of their life and must be replaced with more durable, insulated units. Some have been replaced. The balance must be completed.

**Residential**

Both residential buildings are attractive and comfortable. They are mostly carpeted with adequate air conditioning. Mehl has recently received new air handlers.

The “pod” layout seems effective but has several consistent problems: insufficient privacy and personal space in dormitory suites, bathroom layout and Handicapped (HP) access problems.

Dormitory areas need to be studied and considered for privacy improvements.

As with other state school campuses, the smaller number of students than original capacity allows for substantial improvements to accommodate privacy needs of students as well as the supervision requirements of 24-hour staff.

**Educational**

Overall, the classroom buildings are in excellent condition. Common systematic issues such as windows, exterior facade and building alarms are described elsewhere.

***FINDINGS******Central North Carolina Schools for the Deaf (CNCSD)***  
**Programmatic and Support*****Greensboro, NC***

Simpson-Williams Physical Education Building is in good condition.

Central kitchen could benefit from air conditioning and upgraded refrigerators, freezers and other basic equipment.

**Administration**

Hall-Mericka Administration Building is in great condition, having received a new roof, three air handlers and a central fire panel. The interior is simple but clean with brightly painted concrete block, dropped ceiling panels, vinyl floor tile and carpeting.

Future needs include: new windows, fascia-soffit replacement, panic hardware and removal of small remaining areas of VAT (asbestos-containing floor tile).

**Campus-wide Code Compliance, Repair, Replacement and Upgrade**

Safety alarm and detection systems at CNCSD have been upgraded to meet minimal life-safety standards, but are still sub-standard for a specialized deaf and hard-of-hearing population. Improvements to these life safety systems should be systematically evaluated for every campus building.

HVAC system upgrades and replacements in various buildings are essential to residential comfort and energy efficiency. This includes distribution, air handling and temperature controls.

Non-insulated wood-frame windows throughout the campus are deteriorating and are extremely energy inefficient. Replacement of these windows will provide significant energy savings as well as comfort and aesthetic improvement.

Roofs have been repaired and replaced, but there are several remaining that are in need of repair.

Handicapped/ADA access issues are present throughout the campus, including bathroom layout and hardware, door hardware and exterior campus walkways.

## CONCLUSIONS / RECOMMENDATIONS

*Central North Carolina Schools for the Deaf (CNCSD)**Greensboro, NC*

1. **CNCSD requires a minor-to-moderate amount of repair, replacement, and upgrade without extensive delay.**

The system's newest campus (all buildings built 1977-80) and generally well-maintained, the CNCSD campus is in relatively good condition. It requires a minor-to-moderate volume of repair, replacement, and upgrade in the areas of building exteriors, roofs, safety systems, HVAC and ADA.

The list of necessary improvements is adequately documented at the campus and state administrative level and is currently subject to budgetary prioritization. These improvements are much-needed and should be performed as soon as is feasible.

2. **After a moderate amount of repair, replacement, and upgrade is completed, this campus will be in very good physical condition and is fully capable of another 20-30 years of service.**
3. **At an average census of 50 students, this campus' asset base (five major buildings, residential capacity for 200 students, total size 147,000 gsf) is highly underutilized.**

**The clear challenge to the State of North Carolina is finding ways to maximize this asset.**

The following are some suggestions for maximizing this real estate asset. These suggestions maintain a core function of deaf and hard-of-hearing education on the campus and aim to take advantage of its amenities and close location to greater Greensboro:

- a. Expand CNCSD's program to accommodate high school students (unclear how this would effect high school population at other Schools for the Deaf).
- b. Expand day programs or short or long-term intensive residential training for deaf students now being educated in nearby regional school districts.
- c. Develop specialized day or residential programs for students with multiple disabilities who are now being educated in other publicly-funded human services settings.
- d. Develop secondary and post-secondary vocational programs for the deaf in conjunction with Greensboro-area industrial, technology, and financial services corporations and non-governmental institutions.
- e. Develop a regional/statewide resource for specialized teacher training in the field of deafness. CNCSD is an excellent location for conferences and seminars, including overnight on-campus stays.
- f. Introduce other compatible, but non-deaf human services residential populations, segregating the populations by consolidating uses within the campus.

**CONCLUSIONS / RECOMMENDATIONS***Central North Carolina Schools for the Deaf (CNCSD)**Greensboro, NC*

At the opposite extreme of the utilization spectrum are alternatives which have a greater direct impact on the current deaf education program. These include: relocation of deaf educational services to other scattered site locations and re-use of the entire campus for a wide variety of other public or private uses including: secure residential human services populations (taking advantage of the secluded character of the campus); community middle school or high school; public or private-tenant offices; and/or hotel and conference center.

- 4. Better utilization of this real estate asset should be the focus of a regional interagency planning effort staffed by state agency representatives who are responsible for identifying the long range facility needs of their respective agencies.**
- 5. Appropriate design and engineering expertise should be sought.**

Issues about hardware, HVAC controls, HP access and dormitory layout are relatively non-complex but contain many details that are not effectively tackled on a piecemeal basis.

The State should acquire design and engineering assistance to focus on each of these issues in a systematic campus-wide, non-piecemeal approach.

- 6. The relatively small number of meals required by this campus warrants evaluating whether alternative methods (contracting-out, off-site food preparation, etc.) may be more cost-effective than operating full-service central and satellite kitchens.**
- 7. CNCSD's 75-acre campus appears approximately 50% developed and may be capable of construction of major new buildings or disposition of land for other purposes if needed. If no public sector need arises, land could be sold or leased to produce revenue to benefit deaf services.**

***CAPITAL IMPROVEMENTS PROJECTION******Central North Carolina Schools for the Deaf (CNCSD)******Greensboro, NC*****Introduction**

Capital Improvements Projections were prepared based on the following activities and information.

1. Site visits: The study team met with administration and facility representatives at each of the campuses to discuss facility issues including known systems, safety and functional deficits, and likely future improvements. The study team then walked through each of the major buildings with facility representatives in order to observe the physical and functional conditions and to hear firsthand from those most directly knowledgeable of facility conditions.
2. Information Gathering and Assessment: The Study team then compiled a list of issues for each of the campuses and compared specific items to fcap reports for the campuses to determine what may already be funded or in line for future funding. The remaining items were then compiled and put into categories for calculation of likely funding levels.
3. Capital Improvements Projection: The team then prepared a spreadsheet for each campus listing by building: the present fcaps for 1999-2000, remaining fcaps for all priority categories, and other needs determined during the site visit, thereby preparing a projection of capital cost needs for each of the buildings to address facility needs noted.

The projections include construction costs for buildings and fixed equipment and do not include soft costs such as fees, furnishings, signage and movable equipment. Soft costs may add as much as 30% to 40% to the total depending upon the type and complexity of the project. The estimates for work not included in fcap listings were prepared without the benefit of floor plans which had not been compiled particularly for the older buildings where the anticipated work was most intensive. As a result, rules of thumb were used for projection purposes, for percentage of residential area within an overall building for example. In this way, the team arrived at areas to which \$/sf could be applied to arrive at a construction cost for the improvement. By applying equivalent methodologies to each campus' facility needs, a cost comparison of each campuses needs vis a vis others was developed. This is a preliminary effort to project the costs based on limited information. Actual values may differ when a more detailed study is conducted, yet the relative costs at each campus included here offer a valid picture of comparative capital needs.

***CAPITAL IMPROVEMENTS PROJECTION******Central North Carolina Schools for the Deaf (CNCSD)******Greensboro, NC***

priorities:

1. immediate / must be funded to present needs
2. desirable / would improve present conditions
3. long term / consider funding in 3 - 5 years

| Building/ Item                            |                                | sf            | \$/sf       | total              | priority |                                    |
|---|--------------------------------|---------------|-------------|--------------------|----------|------------------------------------|
| <b>Residential Buildings</b>              |                                |               |             |                    |          |                                    |
| <b>Brown Hall</b>                         |                                | <b>32,223</b> |             |                    |          |                                    |
| renovation residential areas <sup>1</sup> |                                | 14,500        | \$100       | \$1,450,035        | 2,3      | estimated at 45% of total building |
| present fcaps 1999-2000                   |                                |               |             | \$0                |          | see campus wide fcaps 1999-2000    |
| remaining fcaps, all priorities           |                                |               |             | \$118,000          | 1        | roof replacement                   |
|   |                                |               |             | \$44,000           | 1        | replace windows                    |
|   |                                |               |             | \$190,000          | 1        | chiller & cooling tower            |
|   |                                |               |             | \$110,000          | 1        | install sprinklers                 |
|   | <b>Subtotal Brown</b>          |               | <b>\$59</b> | <b>\$1,912,035</b> |          |                                    |
| <b>Mehl Hall</b>                          |                                | <b>31,959</b> |             |                    |          |                                    |
| renovation residential areas <sup>1</sup> |                                | 14,382        | \$100       | \$1,438,155        | 2,3      | estimated at 45% of total building |
| present fcaps 1999-2000                   |                                |               |             | \$0                |          | see campus wide fcaps 1999-2000    |
| remaining fcaps, all priorities           |                                |               |             | \$111,000          | 1        | roof replacement                   |
|   |                                |               |             | \$40,500           | 1        | replace windows                    |
|   |                                |               |             | \$285,000          | 1        | chillier & cooling tower           |
|   |                                |               |             | \$110,000          | 1        | install sprinklers                 |
|   | <b>Subtotal Mehl</b>           |               | <b>\$62</b> | <b>\$1,984,655</b> |          |                                    |
| <b>Educational Buildings</b>              |                                |               |             |                    |          |                                    |
| <b>Dixon Building</b>                     |                                | <b>16,063</b> |             |                    |          |                                    |
| selective upgrades to interior finishes   |                                | 16,063        | \$15        | \$240,945          | 2,3      | estimated at 30% of total building |
| present fcaps 1999-2000                   |                                |               |             | \$0                |          | see campus wide fcaps 1999-2000    |
| remaining fcaps, all priorities           |                                |               |             | \$53,000           | 1        | replace roof                       |
|   |                                |               |             | \$77,000           | 1        | replace windows                    |
|   |                                |               |             | \$55,000           | 1        | install sprinklers                 |
|   | <b>Subtotal Dixon</b>          |               |             | <b>\$425,945</b>   |          |                                    |
| <b>Phillips Payne</b>                     |                                | <b>17,031</b> |             |                    |          |                                    |
| selective upgrades to interior finishes   |                                | 17,031        | \$15        | \$255,465          | 2,3      | estimated at 30% of total building |
| present fcaps 1999-2000                   |                                |               |             | \$0                |          | see campus wide fcaps 1999-2000    |
| remaining fcaps, all priorities           |                                |               |             | \$87,500           | 1        | replace roof                       |
|   |                                |               |             | \$63,000           | 1        | replace windows                    |
|   |                                |               |             | \$58,000           | 1        | install sprinklers                 |
|   | <b>Subtotal Phillips Payne</b> |               |             | <b>\$463,965</b>   |          |                                    |

**CAPITAL IMPROVEMENTS PROJECTION**

*Central North Carolina Schools for the Deaf (CNCSD)*

*Greensboro, NC*

| Building/ Item  |                                     | sf            | \$/sf | total                   | priority           |   |
|---|-------------------------------------|---------------|-------|-------------------------|--------------------|---|
| <b>Programmatic and Support Buildings</b>   |                                     |               |       |                         |                    |   |
| <b>Simpson-Williams</b>   |                                     | <b>15,270</b> |       |                         |                    |   |
| no recommendations in addition to fcaps   |                                     |               |       |                         |                    |   |
| present fcaps 1999-2000   |                                     |               |       | \$0                     |                    | see campus wide fcaps 1999-2000                   |
| remaining fcaps, all priorities   |                                     |               |       | \$57,000                | 3                  | replace roof                                      |
|   |                                     |               |       | \$2,500                 | 1                  | miscellaneous hardware                            |
|   |                                     |               |       | \$52,000                | 1                  | install sprinklers                                |
|   |                                     |               |       | \$17,000                | 3                  | resurface tennis and basketball courts (exterior) |
|   | <b>Subtotal Simpson-Williams</b>    |               |       | <b>\$128,500</b>        |                    |   |
| <b>Maintenance/ Storage</b>   |                                     | <b>7,603</b>  |       |                         |                    |   |
| no recommendation in addition to fcaps  |                                     |               |       |                         |                    |   |
| present fcaps 1999-2000   |                                     |               |       | \$0                     |                    | see campus wide fcaps 1999-2000                   |
| remaining fcaps, all priorities   |                                     |               |       | \$6,000                 | 1                  | miscellaneous exterior and roof repairs           |
|   |                                     |               |       | \$26,000                | 1                  | install sprinklers                                |
|   | <b>Subtotal Maintenance/Storage</b> |               |       | <b>\$32,000</b>         |                    |   |
| <b>Central Kitchen</b>  |                                     | <b>4,293</b>  |       |                         |                    |   |
| no recommendation in addition to fcaps  |                                     |               |       |                         |                    |   |
| present fcaps 1999-2000   |                                     |               |       | \$0                     |                    | see campus wide fcaps 1999-2000                   |
| remaining fcaps, all priorities   |                                     |               |       | \$4,800                 | 3                  | provide new condensing system                     |
|   |                                     |               |       | \$15,000                | 1                  | install sprinklers                                |
|   | <b>Subtotal Central Kitchen</b>     |               |       | <b>\$19,800</b>         |                    |   |
| <b>Site Improvements Campus Wide</b>  |                                     |               |       |                         |                    |   |
| lighting, walks and signage   |                                     |               |       | \$150,000               | 2,3                | allowance for selective improvements              |
| remaining fcaps, all priorities   |                                     |               |       | \$56,120                | 1                  | parking and drives                                |
|   |                                     |               |       | \$12,000                | 1                  | strobe lights and exit lights                     |
|   |                                     |               |       | \$20,000                | 1                  | ASA Study   |
| capital requests for 1999   |                                     |               |       | \$84,000                | 2,3                | digital controls for HVAC systems                 |
|   |                                     |               |       | \$161,000               | 1                  | fascia /soffit completion                         |
|   |                                     |               |       | \$367,825               | 1                  | safety and security deficiencies                  |
|   |                                     |               |       | \$431,039               | 1                  | facility deficiencies                             |
|   |                                     |               |       | \$300,700               | 1                  | fire alarm replacement                            |
|   |                                     |               |       | \$168,000               | 1                  | boiler and furnace replacement                    |
|   | <b>Subtotal Campus Wide</b>         |               |       | <b>\$1,750,684</b>      |                    |   |
| <b>Total Campus</b>   |                                     |               |       | <b>\$6,717,584</b>      |                    |   |
|   |                                     |               |       | <b>priority1</b>        | <b>\$3,020,184</b> |   |
|   |                                     |               |       | <b>other priorities</b> | <b>\$3,697,400</b> |   |
| <sup>1</sup> Re-do residential areas: downsize occupancy to present need; reconfigure areas to provide single occupancy private bedrooms; reconstruct toilet rooms for improved accessibility and durability. |                                     |               |       |                         |                    |   |

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SUMMARY CONCLUSIONS AND RECOMMENDATIONS

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**North Carolina Schools for the Deaf****1. The facility infrastructure of the three-campus residential school system is grossly oversized for the current school population.**

North Carolina's three-campus system of residential schools for the deaf is at a critical turning point. With over three-quarters of a million gross square feet of aging institutional buildings accommodating fewer than 500 students (including fewer than 300 residential students) across three large campuses, the overall ratio of physical plant capacity to resident student is far too high.

For example, at NCSD in Morganton, a relatively small number of residential students (98) and 43 day students now benefit from an occupied infrastructure that includes four gyms, several cafeterias, dozens of separate vocational training spaces, a stand-alone infirmary, and several libraries. Many of these are located in completely separate, aging buildings, all with their own physical maintenance and upkeep liabilities: roofs, windows, heat, air conditioning, mechanical systems, etc. Although beautiful and impressive, this large campus must survive under the enormous and constant weight of huge maintenance and fixed operating costs pressing down on it. In addition, consistent with the natural tendency of any organization to "spread out" and utilize space that is available, the operations of NCSD are spread out across a very wide set of buildings and a very large total volume of occupied space. If one were to design a school today for this number of students, all of these functions would be consolidated within two or three efficient, multi-use buildings. Each of the other campuses is in a similar, but somewhat less dramatic situation.

The current situation presents an opportunity to reorganize the physical assets of the three schools to better meet the operational goals of the overall system and to dramatically lower the capital and operating cost liabilities for the State.

**2. Consolidation to smaller, more cost-efficient quarters could help conserve operating and capital dollars.**

Consolidation of operations to a smaller capital portfolio is a typical strategy that has been used by many large educational and health care institutions around the country which have faced similar declining enrollment/utilization patterns.

Consolidation could occur *within* a campus, *among* the three campuses (i.e., closure of one or two campuses) or a *combination* of both.

Closure of a campus is a strategic service delivery decision that has obvious substantial impact on the ability to deliver geographically-dispersed services and should only be advised after a thorough analysis of the service delivery needs of an entire system.

Consolidation *within* a campus is a *very achievable objective* for each of the three schools and may prove to have significant positive financial impacts.

Consolidations require significant up-front investments but produce an accelerated payback period fueled by savings from the disposition of surplus buildings and from a reduction in the volume of space which must be heated, cooled, policed and maintained.

## SUMMARY CONCLUSIONS AND RECOMMENDATIONS

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### North Carolina Schools for the Deaf

NCSD in Morganton, for example, has taken a giant step toward consolidation of its physical assets by renovating the Main Building, which will house over 200 children. (This renovation also answers the question of what to do with a historic institutional building in danger of deterioration.)

The recent investment in Main Building allows NCSD to consider consolidating all campus operations in or near the Main Building complex. Each campus is capable of a similar form of strategic consolidation.

#### **3. Compatible reuse of vacant campus buildings is ideal.**

After consolidation, what does the State do with the vacant, underutilized space at each campus? Many of the buildings are in very poor condition and warrant "gut" rehabilitation (Goodwin at Morganton for example). Others are in fairly good or "move-in" condition (Brown or Mehl at CNCSD, for example).

Obvious scenarios include mothballing, demolition, sale, or public sector reuse. Mothballing is discussed below. Demolition is often expensive, functionally prohibited (in the case of historic structures), and/or politically unacceptable.

Ideally, any new tenants or new owner/occupants would consist of very compatible or neutral uses. For example, reuse of vacant buildings by a public or private school or another publicly-funded residential program for youth would allow both School for the Deaf and the new tenant partner to share library, communications, food service, maintenance, and physical education assets.

#### **4. Physical plant assets could serve as educational, programmatic and recreational resources for the greater community.**

The State school gyms, libraries, conference rooms and other assets could serve as a resource beyond their direct benefit to the on-site residential deaf and hearing community. These amenities offer many opportunities for developing programming for the non-residential deaf community, as well as other community educational uses. Use by external entities, local community schools and businesses could possibly generate fee revenue.

#### **5. Proximity to other large public institutions warrants further analysis of possible compatibility for shared services or assets.**

ENCSD and NCSD are very close to other large public institutions. This proximity suggests an analysis of opportunities for combining certain operations or purchasing functions to gain cost efficiencies. Food service, laundry, maintenance, and other operations are likely candidates.

## SUMMARY CONCLUSIONS AND RECOMMENDATIONS

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### North Carolina Schools for the Deaf

- 6. A long-range, campus-wide programmatic and physical Masterplan is urgently needed for each campus, particularly at NCSD.**

To capture and organize the necessary data required to advance a strategic plan for the future of each campus, a Masterplan would be ideal. NCSD is desperately in need of such a plan.

This Masterplan would identify the campus' five to ten year mission and set projections for residential and day populations. Deliverables would include: 1) a Consolidation Strategy, 2) Cost Estimates and spending plan, and 3) Reuse Strategy for the surplus land and buildings.

Masterplanning should have input from the agencies responsible for statewide institutional and community-based services for the deaf and hard of hearing and should also include input from state agency representatives who are responsible for identifying the long range facility needs for state government as a whole.

- 7. Many buildings and systems at the three campuses require a moderate amount of repair, replacement, and upgrade without extensive delay.**

Not one of the three campuses has had sufficient resources to keep up with the tremendous cost of maintenance, repair and modernization required by facilities of their size. Typical repair, replacement and upgrade challenges include HVAC systems and controls, roofs, bathrooms, fire safety and alert systems, and ADA accommodations overall.

Consistent across three campuses is the need to invest in dormitory areas and related bathrooms, and special attention to electronic safety and communication systems that are compatible with non-hearing populations.

The list of necessary improvements is generally well-documented at the campus and state administrative level and is currently subject to budgetary prioritization. These improvements are much-needed and should be performed as soon as is feasible.

- 8. Buildings or building portions that are vacant and "on-hold" should be protected by "mothballing", a particular issue for the NCSD.**

Thousands of square feet of building space at NCSD are currently vacant or will become vacant in the near future. Consolidation at other campuses may produce similar results.

Pending acquisition or control by a new tenant who can bring sufficient funds for full renovation and modernization, these buildings or portions will continue to be "on-hold" and will need to be protected from the deteriorating effects of weather and vandalism. "On-hold" periods could easily range from 2-20 years.

Proper "warm" mothballing (versus cold mothballing) includes minimal heat and moisture control, window covering (attractively-painted exterior plywood covers), complete roof repair and/or replacement, and minimal fire detection and alarms.

## SUMMARY CONCLUSIONS AND RECOMMENDATIONS

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### North Carolina Schools for the Deaf

These protections are not inexpensive but are valuable insurance against potential fire, demolition and/or more extensive renovation at a later date.

**9. Appropriate design and engineering expertise should be sought for the many smaller but persistent repair and upgrade issues.**

Issues about roofs, hardware, HVAC controls, HP access, and furnishings and equipment specifications are relatively non-complex but contain many details and are not effectively tackled on a piecemeal basis. Hardware is a good example. Although generally simple in its application, handicapped-accessible door hardware is difficult to specify and there are thousands of individual units to be specified, purchased and installed.

The State should acquire design and engineering assistance to focus on each of these issues in a systematic campus-wide, non-piecemeal approach. Technical consultants could be hired on a multi-year, open-ended "house-doctor" basis to be available to campus staff as-needed. This has been successful in the past when used for roofing projects (the multi-building engineering study and funding pool).

## APPENDIX C

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NORTH CAROLINA DEPARTMENT OF HEALTH AND HUMAN SERVICES  
2001 MAIL SERVICE CENTER R ALEIGH, NORTH CAROLINA 27699-2001  
TEL 919-733-4534 F AX 919-715-4645 C OURIER 56-20-00

JAMES B. HUNT JR., GOVERNOR

H. DAVID BRUTON, M.D.,  
SECRETARY

MARCH 29, 2000

THE HONORABLE RALPH CAMPBELL, JR.  
OFFICE OF THE STATE AUDITOR  
300 NORTH SALISBURY STREET  
RALEIGH, NC 27611

DEAR MR. CAMPBELL:

I AM ENCLOSING THE RESPONSE OF THE DEPARTMENT OF HEALTH AND HUMAN SERVICES TO THE DRAFT REPORT OF THE PERFORMANCE AUDIT ENTITLED DEPARTMENT OF HEALTH AND HUMAN SERVICES, DIVISION OF SERVICES FOR THE DEAF AND HARD OF HEARING.

IN SO DOING, I WANT TO ACKNOWLEDGE AND EXPRESS MY APPRECIATION TO YOU FOR THE CONSUMMATE PROFESSIONALISM DEMONSTRATED BY YOUR STAFF IN CONDUCTING THIS AUDIT. IT WAS CLEAR TO US THAT EACH MEMBER OF THE AUDIT TEAM MADE A CONCERTED EFFORT TO UNDERSTAND THE PROGRAM AND SERVICES PROVIDED BY THE DIVISION OF SERVICES FOR THE DEAF AND HARD OF HEARING. I AM CONFIDENT THAT MANY OF THE AUDIT RECOMMENDATIONS WILL LEAD TO IMPROVED OPERATIONS IN THE DIVISION OF SERVICES FOR THE DEAF AND HARD OF HEARING. I KNOW THAT EACH RECOMMENDATION EVOKED SERIOUS REFLECTION BY OUR STAFF ON HOW WE DO BUSINESS AS WELL AS THE **NEWLY FORMED DIVISION** OF EARLY INTERVENTION AND EDUCATION.

AS A BOTTOM LINE, WE FEEL THAT OUR PARTICIPATION IN THIS PROCESS HAS BEEN HEALTHY FOR US AND WILL LEAD TO FURTHER STRENGTHENING SERVICES TO THE **CHILDREN AND ADULTS WHO ARE DEAF OR HARD OF HEARING** IN NORTH CAROLINA. IF YOU HAVE QUESTIONS OR NEED ADDITIONAL INFORMATION, PLEASE CONTACT PETER LEOUSIS AT (919) 733-4534.

SINCERELY,

A handwritten signature in black ink, appearing to read "H. David Bruton".

H. DAVID BRUTON, M.D.

CC: PETER LEOUSIS  
JIM EDGERTON

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOY  
LOCATION: 101 BLAIR DRIVE A ADAMS BUILDING A DOROTHEA DIX HOSPITAL CAMPUS A RALEIGH, N.C. 27603



## APPENDIX C

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*DIVISION OF EARLY INTERVENTION AND  
EDUCATION*

*DIVISION OF SERVICES FOR THE DEAF AND  
HARD OF HEARING*

*RESPONSE TO STATE PERFORMANCE AUDIT*

## APPENDIX C

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## APPENDIX C

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*FINDING: NO ONE TEACHING METHOD IS BEST FOR ALL DEAF AND HARD OF HEARING CHILDREN.*

*RECOMMENDATION: THE DEPARTMENT SHOULD CAREFULLY REVIEW THE DATA GATHERED BY THE CONSULTANTS AND CONSIDER WHICH METHOD(S) TO EMPLOY IN THE NORTH CAROLINA SCHOOLS FOR THE DEAF. WE ENCOURAGE THE DEPARTMENT TO CONTINUE TO EXPLORE DIFFERENT METHODS OF INSTRUCTION BASED ON THE NEEDS OF EACH INDIVIDUAL STUDENT.*

**RESPONSE:** EACH STUDENT'S EDUCATION WILL BE DIRECTED BY THE DEVELOPMENT OF AN INDIVIDUALIZED EDUCATION PLAN. THE DIVISION OF EARLY INTERVENTION AND EDUCATION WILL DEVELOP AND IMPLEMENT A SEMI-ANNUAL SELF-AUDITING SYSTEM TO ASSURE THAT INSTRUCTION IS BASED UPON INDIVIDUAL STUDENT NEEDS.

THE DIVISION CONTINUES TO SEEK AND IMPLEMENT BEST PRACTICES IN THE EDUCATION OF STUDENTS AT THE SCHOOLS FOR THE DEAF. A STATE ASSISTANCE TEAM, CONSISTING OF TEACHER EXPERTS WITH DISABILITY SPECIFIC BACKGROUND AND WITH PUBLIC SCHOOL BACKGROUND, IS SPEARHEADING INSTRUCTIONAL IMPROVEMENT. IN LIGHT OF THE FACT THAT STUDENTS WHO ARE DEAF IN PUBLIC SCHOOLS EXPERIENCE A HIGHER RATE OF SUCCESS THAN DO STUDENTS WHO ARE DEAF IN TYPICAL RESIDENTIAL SCHOOLS, A NEW FOCUS IS ON EFFECTIVE PRACTICES USED IN PUBLIC SCHOOL ENVIRONMENTS.

*FINDING: THE NUMBER OF STUDENTS CURRENTLY ATTENDING THE SCHOOLS FOR THE DEAF DOES NOT JUSTIFY THE COSTS OF OPERATING THREE SCHOOLS.*

*RECOMMENDATION: THE DEPARTMENT SHOULD CONSIDER CLOSING ONE OR MORE OF THE SCHOOLS FOR THE DEAF AND INTEGRATING THOSE STUDENTS INTO THE REMAINING SCHOOLS(S). MANAGEMENT SHOULD ANALYZE THE PROJECTED STUDENT POPULATION OVER THE NEXT TEN YEARS IN DETERMINING THE NEED FOR THREE SCHOOLS. IN OUR OPINION, THERE ARE SEVERAL OPTIONS THAT SHOULD BE CAREFULLY CONSIDERED. ONE OPTION WOULD BE TO CLOSE THE CENTRAL NORTH CAROLINA SCHOOL FOR THE DEAF (GREENSBORO) SINCE IT DOES NOT SERVE HIGH SCHOOL STUDENTS AND MERGE THESE STUDENTS INTO THE OTHER TWO SCHOOLS. ADDITIONALLY, AS THE NEWEST OF THE PHYSICAL PLANTS, THIS LOCATION OFFERS MORE OPPORTUNITY FOR ALTERNATIVE USES OF THE FACILITY SUCH AS A TRANSITIONAL LIVING FACILITY FOR DEAF STUDENTS. A SECOND OPTION WOULD BE TO CLOSE THE NORTH CAROLINA SCHOOL FOR THE DEAF (MORGANTON) SINCE IT WILL BE THE MOST COSTLY TO RENOVATE AND REPAIR. (SEE ARCHITECT'S REPORT ON PAGE 89.) STILL A THIRD OPTION TO CONSIDER WOULD BE TO CLOSE TWO OF THE SCHOOLS AND MERGE ALL STUDENTS INTO ONE LOCATION. THIS OPTION WOULD FREE UP THE MOST OPERATIONAL FUNDS, ALLOWING ALL RENOVATIONS AND REPAIRS TO BE MADE TO THE CAMPUS CHOSEN AS THE ULTIMATE LOCATION. IN ALL OPTIONS, FUNDS USED TO OPERATE THE SCHOOL(S) CLOSED COULD BE INVESTED INTO THE OPERATION, MAINTENANCE, AND IMPROVEMENT OF THE REMAINING SCHOOLS.*

**RESPONSE:** ALL THREE SCHOOL DIRECTORS AT THE SCHOOLS FOR THE DEAF SUPPORT CLOSING ONE OR MORE SCHOOLS. THIS RECOMMENDATION IS ALSO SUPPORTED BY PAST AND PRESENT ENROLLMENT TRENDS. (FOR EXAMPLE, CENTRAL NORTH CAROLINA SCHOOL FOR THE DEAF IS A 180 BED FACILITY CURRENTLY SERVING 38 RESIDENTIAL STUDENTS. ANOTHER 36 STUDENTS ARE DAY STUDENTS AT CENTRAL. THE PRESCHOOL IS NOW A SEPARATE PROGRAM, MAKING THE TOTAL POPULATION OF THE SCHOOL 74 STUDENTS.)

THE PROPOSAL TO CLOSE ONE OR MORE SCHOOLS IS CONSISTENT WITH RECOMMENDATIONS CONTAINED IN THE PRICE, WATERHOUSE, COOPERS EDUCATION AND DISABILITY ORGANIZATION STUDY, 1999, AUTHORIZED BY THE NORTH CAROLINA GENERAL ASSEMBLY. WE WILL SERIOUSLY EXPLORE OPTIONS IN THE NEAR FUTURE.

**FINDING:** MAINSTREAMED DEAF AND HARD OF HEARING STUDENTS ARE PASSING THE END-OF-GRADE TESTS AT A HIGHER RATE THAN ARE STUDENTS FROM THE SCHOOLS FOR THE DEAF.

**RECOMMENDATION:** THE DEPARTMENT AND THE DIVISION OF EARLY INTERVENTION AND EDUCATION SHOULD CAREFULLY EVALUATE THE END-OF-GRADE TESTS FOR STUDENTS OF THE SCHOOLS FOR THE DEAF. WITH ASSISTANCE FROM THE DEPARTMENT OF PUBLIC INSTRUCTION, THE DIVISION SHOULD EXAMINE THE COURSE OF

## APPENDIX C

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STUDY AT EACH OF THE THREE SCHOOLS FOR THE DEAF AND DETERMINE WHETHER THE SCHOOLS ARE ADEQUATELY MEETING THE STANDARD REQUIREMENTS. SPECIFIC ATTENTION SHOULD BE GIVEN TO THE AREAS INCLUDED IN THE END-OF-GRADE TESTS, WITH CONSIDERATION AS TO WHETHER ADDITIONAL RESOURCES ARE NEEDED AT THE SCHOOLS FOR THE DEAF TO MEET THESE REQUIREMENTS.

**RESPONSE:** THE DIVISION OF EARLY INTERVENTION AND EDUCATION HAS WORKED COLLABORATIVELY WITH THE DEPARTMENT OF PUBLIC INSTRUCTION IN PROVIDING A STATE ASSISTANCE TEAM THAT SERVES AS A RESOURCE TO THE SCHOOLS FOR THE DEAF. TEAM MEMBERS HAVE GIVEN TOP PRIORITY TO THE USE OF THE STANDARD COURSE OF STUDY AND BEST INSTRUCTIONAL PRACTICES IN THE AREAS TO BE TESTED. THE SCHOOLS FOR THE DEAF WILL PARTICIPATE IN THE ABCs OF PUBLIC EDUCATION FOR THE FIRST TIME THIS SCHOOL YEAR, 1999-2000.

**FINDING:** MORE MAINSTREAMED DEAF AND HARD OF HEARING STUDENTS RECEIVE DIPLOMAS THAN DO STUDENTS FROM THE SCHOOLS FOR THE DEAF.

**RECOMMENDATION:** THE DEPARTMENT AND THE DIVISION OF EARLY INTERVENTION AND EDUCATION SHOULD CLOSELY EXAMINE THE GRADUATION DATA FOR THE SCHOOLS FOR THE DEAF. WITH ASSISTANCE FROM THE DEPARTMENT OF PUBLIC INSTRUCTION, OTHER METHODS TO INCREASE THE NUMBER OF STUDENTS RECEIVING DIPLOMAS UPON COMPLETION OF THE TWELFTH GRADE SHOULD BE EXAMINED.

**RESPONSE:** THE DIVISION OF EARLY INTERVENTION AND EDUCATION WILL CONTINUE TO WORK CLOSELY WITH THE DEPARTMENT OF PUBLIC INSTRUCTION AND LOCAL SCHOOL SYSTEMS TO BOTH STRENGTHEN THE IN-HOUSE INSTRUCTIONAL PROGRAM AT THE SCHOOLS FOR THE DEAF AND TO MAINSTREAM STUDENTS INTO SETTINGS THAT GRADUATE A HIGHER RATE OF STUDENTS WHO ARE DEAF. ADDITIONALLY, STAFF DEVELOPMENT WILL FOCUS ON HIGH EXPECTATIONS FOR STUDENT AND STAFF SUCCESS, AND EFFECTIVE INSTRUCTIONAL PRACTICES.

IT IS RELEVANT TO NOTE THAT THE SCHOOLS FOR THE DEAF SERVE A LARGER NUMBER OF STUDENTS WHO ARE DEAF AND HAVE ADDITIONAL LEARNING CHALLENGES THAN DOES THE TYPICAL PUBLIC SCHOOL SYSTEM.

**FINDING:** NCSD DOCUMENTATION OF THE ADMISSION PROCESS IS INCOMPLETE.

**RECOMMENDATION:** NCSD SHOULD IMPLEMENT PROCEDURES TO ENSURE COMPLIANCE WITH ITS ADMISSION POLICIES AND PROCEDURES. ALL REQUIRED DOCUMENTATION NECESSARY TO SUPPORT A STUDENT'S ELIGIBILITY FOR ADMISSION TO THE SCHOOL SHOULD BE MAINTAINED IN EACH STUDENT'S FILE AT A CENTRALIZED LOCATION. ADDITIONALLY, THE DIVISION OF EARLY INTERVENTION AND EDUCATION SHOULD CONDUCT PERIODIC REVIEW OF FILES FOR COMPLIANCE.

**RESPONSE:** THE DIVISION OF EARLY INTERVENTION AND EDUCATION WILL IMPLEMENT UNIFORM ADMISSION POLICIES AND PROCEDURES AT THE SCHOOLS FOR THE DEAF FOR THE 2000-2001 SCHOOL YEAR. FILES WILL BE MAINTAINED AT A CENTRAL LOCATION AT EACH SCHOOL SITE. IN ADDITION TO EACH SCHOOL DIRECTOR, SCHOOLS WILL BE EXPECTED TO SUBMIT THE NAME OF THE PERSON WHO WILL HOLD FIRST LINE ACCOUNTABILITY FOR FULL COMPLIANCE OF POLICIES AND PROCEDURES. ADDITIONALLY, THE DIVISION WILL ASSIGN A STAFF MEMBER THE RESPONSIBILITY TO CONDUCT SEMI-ANNUAL REVIEWS OF FILES TO ASSURE COMPLIANCE (COMPLIANCE OFFICER).

**FINDING:** SCHOOLS ARE NOT IN COMPLIANCE WITH THE REQUIREMENTS OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT (PUBLIC LAW 94-142).

**RECOMMENDATION:** THE SCHOOLS SHOULD IMPLEMENT PROCEDURES TO ENSURE COMPLIANCE WITH PUBLIC LAW 94-142. ALL REQUIRED DOCUMENTATION NECESSARY TO MONITOR A STUDENT'S IEP PROGRESS SHOULD BE MAINTAINED IN EACH STUDENT'S FILE AT A CENTRALIZED LOCATION. MANAGEMENT SHOULD BEGIN THE PROCESS OF SCHEDULING AND CONDUCTING IEP MEETINGS FAR ENOUGH IN ADVANCE TO ENSURE THAT ALL STUDENTS HAVE THEIR IEP UPDATED AT LEAST ANNUALLY. FURTHER, THE STUDENT SUPPORT SERVICES DIRECTOR AT ENCSD SHOULD MONITOR THE ABSENCES OF HIS/HER EMPLOYEES. WHEN AN EMPLOYEE WILL BE

## APPENDIX C

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ABSENT FOR AN EXTENDED PERIOD OF TIME, THE SCHOOL SHOULD CONTRACT FOR THE SERVICES REQUIRED IN THE STUDENT'S IEP.

**RESPONSE:** THE DIVISION OF EARLY INTERVENTION AND EDUCATION WILL ASSIGN A STAFF MEMBER TO PROVIDE OVERSIGHT TO SCHOOLS IN THE ESTABLISHMENT OF EXPECTATIONS AND PROCEDURES TO ENSURE IDEA COMPLIANCE (OFFICER PREVIOUSLY NOTED). INITIAL TRAINING WAS PROVIDED TO APPROPRIATE STAFF FROM EACH SCHOOL IN THE FALL OF 1999. THE COMPLIANCE OFFICER WILL ASSURE CONTINUED TRAINING AND AWARENESS OF LAWS AS WELL AS IMPLEMENTATION METHODS. THIS POSITION WILL ALSO ESTABLISH A PROGRAM OF ON-GOING MONITORING THROUGH FREQUENT REVIEWS OF SCHOOL RECORDS. IT HAS BEEN MADE CLEAR TO ALL SUPERVISORY STAFF THAT EMPLOYEE ABSENCES DO NOT REDUCE A SCHOOL'S RESPONSIBILITY TO DELIVER SERVICES TO A STUDENT AS IDENTIFIED ON THE STUDENT'S IEP.

**FINDING:** NCSD AND ENCSO ARE NOT COMPLYING WITH THE STATE REGULATIONS REGARDING TRANSCRIPTS FOR HIGH SCHOOL STUDENTS.

**RECOMMENDATION:** THE SCHOOLS SHOULD REVIEW ALL HIGH SCHOOL STUDENT FILES TO ENSURE THAT TRANSCRIPTS ARE ON FILE FOR ALL STUDENTS. NCSD SHOULD CONTINUE ITS EMPHASIS ON IMPLEMENTING SIMS AND USE THE FORMAT FOR THE NORTH CAROLINA STANDARD TRANSCRIPT CONTAINED WITHIN THE SIMS DATABASE TO COMPLY WITH STATE RULES AND REGULATIONS. THE DIVISION OF EARLY INTERVENTION AND EDUCATION SHOULD CONDUCT PERIODIC REVIEWS TO ASSURE COMPLIANCE.

**RESPONSE:** UPON FORMATION IN OCTOBER OF 1999, THE DIVISION OF EARLY INTERVENTION AND EDUCATION REQUIRED ALL SCHOOLS TO IMPLEMENT SIMS. THEREFORE, ALL STUDENT TRANSCRIPTS ARE PRESENTLY IN THE NORTH CAROLINA STUDENT TRANSCRIPT FORMAT CONTAINED WITHIN THE SIMS DATABASE. THE DIVISION'S COMPLIANCE OFFICER WILL CONDUCT ANNUAL REVIEWS TO ENSURE COMPLIANCE.

**FINDING:** ARCHITECTS ESTIMATE IT WOULD TAKE \$52 MILLION TO ADEQUATELY ADDRESS NEEDED REPAIRS AND MAINTENANCE AT THE SCHOOLS FOR THE DEAF.

**RECOMMENDATION:** THE DEPARTMENT SHOULD CAREFULLY REVIEW THE FINDINGS AND RECOMMENDATIONS CONTAINED IN THE REPORT FROM HOSKINS, SCOTT AND PARTNERS AND PRIORITIZE THEM. THE GENERAL ASSEMBLY SHOULD BE MADE AWARE OF PHYSICAL PLANT NEEDS ON THE CAMPUSES AND IDENTIFY FUNDS TO ADDRESS THESE NEEDS AS SOON AS POSSIBLE. FURTHERMORE, EACH SCHOOL DIRECTOR SHOULD, AFTER CONSULTATION WITH THE DEPARTMENT, PRIORITIZE BUILDING RENOVATION REQUIREMENTS AND ENSURE THAT AVAILABLE FUNDS ARE DIRECTED TOWARD THE MOST PRESSING NEEDS. THE DEPARTMENT AND THE SCHOOLS SHOULD DEVELOP A LONG-RANGE PLAN FOR THE RENOVATION OF EXISTING BUILDINGS AND UTILIZATION OF CAMPUS FACILITIES.

**RESPONSE:** THE DIVISION OF EARLY INTERVENTION AND EDUCATION CONTINUES ITS COLLABORATION WITH THE DIVISION OF PROPERTY AND CONSTRUCTION TO ADDRESS BOTH SHORT-TERM AND LONG-TERM PHYSICAL PLANT NEEDS AND EFFICIENT UTILIZATION OF SPACE. SCHOOL DIRECTORS WILL BE INVOLVED IN THE PROCESS OF PLANNING, PRIORITIZING AND REQUESTING FUNDS TO ADDRESS REPAIR AND RENOVATION NEEDS.

**FINDING:** THE SCHOOLS FOR THE DEAF DO NOT HAVE A UNIFORM REPORTING METHOD FOR INCIDENTS OR ACCIDENTS.

**RECOMMENDATION:** THE DIVISION OF EARLY INTERVENTION AND EDUCATION SHOULD IMMEDIATELY REVIEW ALL PROCEDURES FOR REPORTING AND REFERRAL OF INCIDENTS. A UNIFORM SYSTEM TO BE USED BY ALL THREE SCHOOLS SHOULD BE DEVELOPED AND IMMEDIATELY IMPLEMENTED. EACH SCHOOL DIRECTOR SHOULD TAKE STEPS TO ASSURE THAT ALL STAFF ARE AWARE OF THE POLICIES AND PROCEDURES FOR REPORTING ALL TYPES OF INCIDENTS AND ARE TRAINED IN HOW AND WHEN TO REPORT INCIDENTS. TO ENSURE THAT ALL INCIDENTS AND ACCIDENTS ARE REPORTED AND NOT LOST, THE SCHOOLS SHOULD BEGIN USING PRE-NUMBERED FORMS AND ACCOUNT FOR EACH, INCLUDING VOIDED FORMS.

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**RESPONSE:** SCHOOL DIRECTORS ARE RESPONSIBLE FOR AND HAVE TRAINED ALL STAFF IN DIRECTIVE 61, "REPORTING ABUSE, NEGLECT OR EXPLOITATION BY DHHS DIVISIONS, INSTITUTIONS, AND SCHOOLS". AN IN-DEPTH PROCEDURE HAS BEEN DEVELOPED AND IMPLEMENTED TO STANDARDIZE REPORTING METHODS ACROSS THE RESIDENTIAL SCHOOLS. MANAGEMENT INVESTIGATION TEAMS (MIT) AT EACH SCHOOL ARE RESPONSIBLE FOR COMPLETING AN EXHAUSTIVE INVESTIGATION OF ANY SUSPICION OF ABUSE, NEGLECT OR EXPLOITATION. THE TEAMS OPERATE UNDER PROCEDURES THAT REQUIRE IMMEDIATE NOTIFICATION OF PARENTS, POLICE, AND/OR LOCAL DIVISION OF SOCIAL SERVICES, AS THE SITUATION WARRANTS. MITs ARE REQUIRED TO IMMEDIATELY REPORT TO THE DIVISION OF EARLY INTERVENTION AND EDUCATION 'S OMBUDSMAN. MULTIPLE TRAINING SESSIONS HAVE TAKEN PLACE. THE REPORTING AND INVESTIGATION PROCESS HAS BEEN STANDARDIZED. THE STANDARDIZATION AND NUMBERING OF FORMS IS IMMINENT.

**FINDING:** Neither the Division of Services for the Deaf and Hard of neither Hearing nor ENCSD has an effective workplace safety program.

**RECOMMENDATION:** WE SUPPORT THE DEPARTMENT IN ITS EFFORTS TO ADDRESS DIVISION WORKPLACE SAFETY ISSUES. THE DIVISION SHOULD TAKE IMMEDIATE STEPS TO BECOME COMPLIANT WITH GENERAL STATUTES AND DEPARTMENT REGULATIONS WITH RESPECT TO EMPLOYEE SAFETY. ALSO, THE ENCSD DIRECTOR AND SAFETY OFFICER/COMMITTEE CHAIRMAN SHOULD TAKE STRONGER STEPS TO ENSURE THAT THE HEALTH AND SAFETY COMMITTEE MEET IN ACCORDANCE WITH THE PRESCRIBED POLICY.

**RESPONSE:** THE DIVISION OF SERVICES FOR THE DEAF AND HARD OF HEARING CAME UNDER THE LEADERSHIP OF THE VOCATIONAL REHABILITATION SAFETY DIRECTOR FEBRUARY 1, 2000. COMPLIANCE WITH STATE WORKPLACE SAFETY STATUTES [GS 143-581 AND GS 143-582] AND WITH DHHS DIRECTIVE 26 WILL BE IMPLEMENTED FOR THIS DIVISION BY MAY 1, 2000, WITH FULL IMPLEMENTATION OF DEPARTMENT POLICIES BY JULY 1, 2000. PROGRAM MONITORING FOR COMPLIANCE WILL BE THE RESPONSIBILITY OF THE DIVISION OF HUMAN RESOURCES AND WILL BE CONDUCTED AT LEAST ANNUALLY.

EFFECTIVE APRIL 1, 2000, SAFETY COMMITTEE MEETINGS WILL BE HELD AT ENCSD AND THE DIVISION OF EARLY INTERVENTION AND EDUCATION AS PRESCRIBED BY POLICY. FOR AUDIT PURPOSES, MINUTES OF THE MEETINGS WILL BE MAINTAINED.

**FINDING:** NEITHER THE DIVISION NOR THE SCHOOLS HAVE ADDRESSED FIRE SAFETY NEEDS IN A TIMELY MANNER.

**RECOMMENDATION:** THE DIVISION SHOULD IMMEDIATELY PROVIDE CONSPICUOUS POSTINGS OF BUILDING EMERGENCY ESCAPE ROUTES AND REQUEST THE BUILDING OWNER/LANDLORD TO INSTALL FLASHING SMOKE DETECTION DEVICES TO PROVIDE ADEQUATE WARNING FOR ALL EMPLOYEES. THE DEPARTMENT SHOULD IDENTIFY FACILITY FIRE SAFETY NEEDS, PRIORITIZE THEM, AND REQUEST FUNDS FROM THE GENERAL ASSEMBLY TO ADDRESS THESE NEEDS. AS FUNDS BECOME AVAILABLE, THE DEPARTMENT SHOULD OVERSEE THE CORRECTION OF NOTED DEFICIENCIES. LASTLY, EACH SCHOOL DIRECTOR SHOULD TAKE STEPS TO ASSURE THAT ALL FIRE DRILLS ARE CONDUCTED IN ACCORDANCE WITH POLICY.

**RESPONSE:** DIVISION EVACUATION PLANS WITH PROPER POSTINGS WILL BE IMPLEMENTED FOR COMPLIANCE BY MAY 1, 2000. PROGRAM COMPLIANCE WILL BE THE RESPONSIBILITY OF THE VR AND DEIE SAFETY DIRECTORS. THE DEPARTMENT EMPLOYEE SAFETY/HEALTH SECTION WILL REVIEW CONSULTATION AND MONITORING FOR COMPLIANCE.

THE IDENTIFICATION OF DEFICIENCIES WILL BE DOCUMENTED AT THE SCHOOLS THROUGH MONTHLY BUILDING INSPECTIONS AND BY THE ANNUAL DEPARTMENT OF INSURANCE INSPECTIONS. THE DIVISION OFFICES WILL NOTE DEFICIENCIES THROUGH QUARTERLY BUILDING INSPECTIONS. NOTED FINDINGS WILL BE PROCESSED FOR CORRECTIVE ACTION AND/OR DIVISION NOTIFICATIONS FOR FUNDING REQUEST. FOLLOW-UP FOR CORRECTIVE ACTION OR PRIORITIZING NEEDS WILL BE THE DEIE SAFETY DIRECTOR'S DUTY. THE DEIE SAFETY DIRECTOR WILL COORDINATE ACTIVITIES WITH THE SCHOOLS' MAINTENANCE DIRECTOR AND SCHOOL DIRECTORS.

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EFFECTIVE MAY 1, 2000, FIRE DRILLS WILL BE DOCUMENTED MONTHLY WITH A CONSISTENT DOCUMENTATION FORM USED BY ALL SCHOOLS. THE SCHOOL SAFETY REPRESENTATIVE WILL MAINTAIN FIRE DRILL RECORDS AT EACH SCHOOL. REVIEW OF RECORDS WILL BE CONDUCTED AT LEAST ANNUALLY.

**FINDING:** CNCSD HAS FAILED TO ANNUALLY UPDATE BUILDING CONTENT VALUES FOR INSURANCE PURPOSES.

**RECOMMENDATION:** *CNCSD SHOULD IMMEDIATELY UPDATE THE BUILDING CONTENT VALUES AND FORWARD THESE TO DOI AND THE NEW SUPERINTENDENT FOR THE DIVISION OF EARLY INTERVENTION AND EDUCATION. THE SAFETY OFFICER, OR ANOTHER DESIGNATED STAFF MEMBER, SHOULD BE RESPONSIBLE FOR UPDATING BUILDING CONTENT VALUES ANNUALLY AND REPORTING THEM TO DOI AND THE DIVISION.*

**RESPONSE:** *THIS FUNCTION WILL BE ASSIGNED UNIFORMLY ACROSS THE RESIDENTIAL SCHOOLS THROUGH THEIR ON-SITE BUSINESS OFFICES WITH OVERSIGHT BY THE DEIE BUSINESS OFFICE. THE DIVISION WILL MONITOR TO ASSURE COMPLIANCE WITH YEARLY UPDATES.*

**FINDING:** *THE ORGANIZATIONAL STAFFING STRUCTURE IS NOT CONSISTENT AT THE SCHOOLS.*

**RECOMMENDATION:** THE ORGANIZATION OF THE SCHOOLS SHOULD BE RESTRUCTURED SO THAT THE SCHOOLS ARE UNIFORM AND CONSISTENT IN THEIR APPROACH TO EDUCATING STUDENTS. EXHIBIT 13 DEPICTS OUR RECOMMENDED ORGANIZATIONAL CHART. EACH SECTION WITHIN EACH SCHOOL'S ORGANIZATION SHOULD INCLUDE THE SAME FUNCTIONS AND CONSISTENT CLASSIFICATIONS SHOULD BE USED FOR SIMILAR RESPONSIBILITIES AT ALL THREE SCHOOLS. DUE TO THE CONCERNS IDENTIFIED REGARDING SAFETY, PERSONNEL, AND BUSINESS MANAGEMENT, WE BELIEVE THESE FUNCTIONS SHOULD REPORT DIRECTLY TO EITHER THE DIVISION OF EARLY INTERVENTION AND EDUCATION OR THE DEPARTMENT'S DIVISION OF HUMAN RESOURCES, AS SHOWN IN EXHIBIT 13 BELOW, TO ALLOW IMPROVED OVERSIGHT. THE DIVISION OF EARLY INTERVENTION AND EDUCATION SHOULD WORK IN CONJUNCTION WITH THE DEPARTMENT'S DIVISION OF HUMAN RESOURCES TO REVIEW AND UPDATE JOB DESCRIPTIONS AND POSITION CLASSIFICATIONS AS NEEDED.

**RESPONSE:** REORGANIZATION IS TAKING PLACE IN STAGES, THE FIRST OF WHICH WAS THE FORMATION OF THE DIVISION OF EARLY INTERVENTION AND EDUCATION AND THE SCHOOLS BEING MOVED UNDER THIS DIVISION. THE NEXT PHASE, SCHEDULED FOR THE SPRING (2000), IS THE DESIGN OF A CONSISTENT ORGANIZATIONAL CHART TO ASSURE EQUITABLE RESOURCES AND SERVICE DELIVERY TO STUDENTS WHO ARE DEAF OR HARD OF HEARING ACROSS THE STATE. THE PROPOSED O CHART (EXHIBIT 13) AND THE RECOMMENDED O CHART CONTAINED IN THE PRICE, WATERHOUSE, COOPERS EDUCATION AND DISABILITY ORGANIZATION STUDY WILL SERVE AS BLUEPRINTS.

IN JANUARY 2000, THE DIVISION OF HUMAN RESOURCES [DHR] ASKED ALL AGENCY DIVISIONS AND INSTITUTIONS TO PRIORITIZE POSITION CLASSIFICATION NEEDS, WHICH INCLUDES THE DIVISION OF SERVICES FOR THE DEAF AND HARD OF HEARING [DSDHH] AND THE DIVISION OF EARLY INTERVENTION AND EDUCATION [DEIE]. PRIORITIES WILL BE BASED ON DIFFICULTY IN RECRUITMENT, RETENTION PROBLEMS, THE SCOPE OF THE ORGANIZATION'S CHANGE ON POSITION FUNCTIONS, AND THE IMPACT OF REQUESTS ON OTHER AGENCY PROGRAMS. THE RESULTANT CLASSIFICATIONS FROM DHR REVIEWS WILL BE BASED ON MANAGEMENT'S DESIRED ORGANIZATIONAL STRUCTURE AND THE RESPONSIBILITIES ASSIGNED TO INDIVIDUAL POSITIONS.

THE DIVISION OF HUMAN RESOURCES WILL CONTINUE TO WORK COOPERATIVELY WITH THE DSDHH AND DEIE ON CLASSIFICATION PRIORITIES AND CONSULT WITH THE DIVISIONS ON JOB AND ORGANIZATIONAL DESIGN.

**FINDING:** THE CREATION OF THE DIVISION OF EARLY INTERVENTION AND EDUCATION AND THE LACK OF APPROPRIATE OVERSIGHT INDICATE A NEED TO REORGANIZE THE DIVISION OF SERVICES FOR THE DEAF AND HARD OF HEARING.

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**RECOMMENDATION:** THE DIVISION OF SERVICES FOR THE DEAF AND HARD OF HEARING SHOULD CONSIDER REORGANIZING AS SHOWN IN EXHIBIT 16. IN OUR OPINION, THE PROPOSED ORGANIZATIONAL STRUCTURE WOULD BETTER ENABLE THE DIVISION TO PROVIDE SERVICES TO THE ADULT DEAF AND HARD OF HEARING POPULATION.

**RESPONSE:** THE DIVISION OF SERVICES FOR THE DEAF AND THE HARD OF HEARING HAS SUBMITTED A REORGANIZATION PLAN TO DHHS FOR ITS CONSIDERATION AND APPROVAL.

**FINDING:** THE REGIONAL RESOURCE CENTERS (RRCs) STAFFING PATTERNS MAY LEAD TO INCONSISTENT PROVISION OF SERVICES ACROSS THE STATE.

**RECOMMENDATION:** All Regional Resource Centers should be staffed fully to provide a uniform array of services to the consumers within each region. In our opinion, the Department should carefully consider the structure shown in Exhibit 17. If necessary, the Department should consider relocating some of the RRCs to better balance the services provided. Also, the Department should analyze whether a full-time manager is necessary for each site or whether two sites may be able to share one manager.

**RESPONSE:** FOUR RRCs WERE ESTABLISHED IN 1977, A FIFTH RRC WAS ADDED IN 1983, AND A SIXTH IN 1985. STAFFING WAS INCREASED, VIA APPROPRIATION IN 1994, FROM THE ORIGINAL 2-3 TO 6-7 PER CENTER. SINCE THAT TIME BUDGET CUTS HAVE FORCED STAFFING REDUCTIONS. PRESENTLY, THERE ARE FOUR MANAGERS COVERING SEVEN OFFICE LOCATIONS. THE WILSON MANAGER ALSO MANAGES THE WILMINGTON OFFICE, AND THE MORGANTON AND ASHEVILLE RRCs HAVE THE SAME MANAGER. THE GREENSBORO RRC WAS NEVER FULLY DEVELOPED, AND CONSISTS OF ONE POSITION THAT WAS REASSIGNED FROM THE CENTRAL ADMINISTRATION. THAT POSITION NOW REPORTS TO THE RALEIGH RRC, AND IS REGARDED AS A SATELLITE OFFICE OF THE RALEIGH PROGRAM. TWO OFFICES HAVE DEAF/BLIND SERVICES CONSULTANTS WHICH AFFECT THE STAFFING BALANCE AS WELL.

Six RRCs had 15 employees in 1985. The 1994 appropriation increased RRC staffing to 38. Staffing was consistent in all RRC's at that time. However, budget reductions in 1995-96 reduced the number of RRC employees to 34. The Greensboro office was added in 1996 resulting in the current 35 RRC staff. The impact of staff reductions was felt in the RRCs in Morganton, Asheville, Wilson and Wilmington. The manager's positions in Wilmington and Asheville were eliminated along with the Interpreter Services Consultant (ISSC) in Asheville and the Community Services Consultant (CSSC) in Morganton. One Manager, one ISSC, and one CSSC now serve both Asheville and Morganton regions. One manager now also serves both Wilson and Wilmington regions. Due to the resulting staff shortages, some positions must cover large catchment areas. Without additional positions, there is no way the division can remedy the situation.

### RRC STAFFING HISTORY

| RRC        | 81-82 | 83-84 | 84-85 | 93-94 | 94-95 | 95-96 | 96-97 | 99-00 |
|------------|-------|-------|-------|-------|-------|-------|-------|-------|
| Wilmington | NA    | NA    | 2     | 6     | 6     | 4     | 4     | 4     |
| WILSON     | 3     | 3     | 3     | 7     | 7     | 7     | 7     | 7     |
| RALEIGH    | 3     | 3     | 3     | 6     | 6     | 6     | 6     | 6     |
| CHARLOTTE  | 3     | 3     | 3     | 7     | 7     | 7     | 7     | 7     |
| GREENSBORO | NA    | NA    | NA    | NA    | NA    | NA    | 1     | 1     |
| MORGANTON  | NA    | NA    | 2     | 6     | 6     | 5     | 5     | 5     |
| ASHEVILLE  | 2     | 2     | 2     | 6     | 6     | 4     | 4     | 4     |
| TOTALS     | 11    | 11    | 15    | 38    | 38    | 34    | 35    | 35    |

**FINDING:** THE DIVISION AND SCHOOLS DID NOT MAXIMIZE THEIR PERSONNEL RESOURCES BY FILLING VACANCIES TIMELY.

**RECOMMENDATION:** WITH ASSISTANCE FROM THE DEPARTMENT'S DIVISION OF HUMAN RESOURCES, THE DIVISION OF EARLY INTERVENTION AND EDUCATION AND THE DIVISION OF SERVICES FOR THE DEAF AND THE HARD OF HEARING SHOULD EVALUATE THE NECESSITY OF ALL VACANT POSITIONS. DEPARTMENT MANAGEMENT SHOULD EVALUATE THE PROCEDURES USED TO FILL VACANCIES, IDENTIFY POINTS OF DELAY, AND MODIFY PROCEDURES TO FILL NEEDED POSITIONS IN A TIMELY MANNER. IN ADDITION, CONSIDERATION SHOULD BE GIVEN

THE RESPONSE FROM THE DEPARTMENT OF HEALTH AND HUMAN SERVICES HAS BEEN REFORMATTED TO CONFORM WITH THE STYLE AND FORMAT OF THE REST OF THE AUDIT REPORT. HOWEVER, NO DATA HAS BEEN CHANGED.

## APPENDIX C

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TO PERMANENTLY CONTRACTING ANY SPECIALIZED SERVICE POSITIONS THAT REMAIN VACANT FOR LONGER THAN NINETY DAYS.

**RESPONSE:** IN AUGUST 1999, THE DIVISION OF HUMAN RESOURCES AUTHORIZED ALL AGENCIES WITH DIRECT CARE POSITIONS THE FLEXIBILITY TO POST VACANCIES FOR SEVEN DAYS TO IMPROVE EFFICIENCY IN THE HIRING PROCESS. THIS IS THE MINIMUM NUMBER OF DAYS ALLOWED BY OSP POLICY. PREVIOUSLY, THE NUMBER OF DAYS A JOB WAS POSTED IN DHHS WAS FOURTEEN AND/OR JOBS WERE CONTINUOUSLY POSTED UNLESS AN EXCEPTION WAS APPROVED TO POST JOBS FOR A SHORTER DURATION.

TO EXPEDITE THE HIRING PROCESS FOR EDUCATOR CLASSIFICATIONS, IN SEPTEMBER 1998, THE DIVISION OF HUMAN RESOURCES GRANTED AUTHORITY TO EACH INSTITUTION'S EDUCATION COORDINATOR TO DETERMINE RELEVANT EDUCATOR CREDENTIALS FOR LICENSING AND SALARY DETERMINATION WITHOUT WAITING FOR THE DPI REVIEW PROCESS; THIS CAN SAVE UP TO SIX WEEKS IN THE HIRING PROCESS. THE DIVISION OF HUMAN RESOURCES, WORKING IN CONJUNCTION WITH MANAGEMENT, HAS ESTABLISHED A PRIORITY TO REVIEW HIRING PROCEDURES AT THE SCHOOLS IN HOPES OF FURTHER REDUCING THE TIME IT TAKES TO FILL VACANCIES. THIS IS THE SECOND OF FIVE PRIORITIES, ONE OF WHICH WAS THE REVIEW AND RE-CLASSIFICATION OF RESIDENTIAL LIFE POSITIONS THAT WAS COMPLETED JANUARY 1, 2000. THE REVIEW OF THE RECRUITMENT PROCESS WILL BEGIN THE THIRD QUARTER OF THIS CALENDAR YEAR.

ALSO, DUE TO THE ESTABLISHED NEED FOR REORGANIZATION IN CREATING THE NEW DIVISION AND THE UPCOMING ALIGNING OF O CHARTS, A HIRING FREEZE HAS BEEN IMPOSED BY THE ASSISTANT SECRETARY. THIS OBVIOUSLY HAS CONTRIBUTED TO THE LENGTH OF TIME IN FILLING POSITIONS.

DSDHH HAS EXPERIENCED DIFFICULTY IN RECRUITING AND WILL BE CONDUCTING MORE AGGRESSIVE RECRUITING.

**FINDING:** THE DIVISION AND THE SCHOOLS' PLANNING PROCESS DOES NOT CAPTURE THE NECESSARY LEVEL OF DETAIL.

**RECOMMENDATION:** THE DEPARTMENT SHOULD CONTINUE ITS EFFORTS TO ESTABLISH AND IMPLEMENT PROCEDURES FOR A COMPREHENSIVE SHORT-TERM AND LONG-TERM PLANNING PROCESS. THE LONG-TERM PLAN SHOULD ADDRESS AREAS IN DETAIL. EACH SECTION CHIEF SHOULD SUBMIT DETAILED GOALS AND OBJECTIVES TO MANAGEMENT FOR INCLUSION IN THE DIVISION'S AND DEPARTMENT'S OVERALL PLAN. THE SHORT-TERM PLAN SHOULD BE PREPARED EACH YEAR DETAILING HOW FUNDS APPROPRIATED BY THE LEGISLATURE WILL BE SPENT IN THE MAJOR OPERATIONAL AREAS CONTAINED IN THE LONG-TERM PLAN. DETAILED MEASURES OF PERFORMANCE SHOULD BE IDENTIFIED, GATHERED, AND EVALUATED FOR EACH OBJECTIVE.

**RESPONSE:** A MAJOR RESPONSIBILITY OF SCHOOL DIRECTORS IN THE FUTURE WILL BE THE DEVELOPMENT OF LONG-TERM AND SHORT-TERM PLANS CONTAINING THE APPROPRIATE LEVEL OF DETAIL. ADDITIONALLY, THE DIVISION OF EARLY INTERVENTION AND EDUCATION WILL HIRE A DIRECTOR OF STAFF DEVELOPMENT WHO WILL LEAD EACH SCHOOL IN THE FORMATION OF A SCHOOL IMPROVEMENT PLAN WHICH WILL INCLUDE THE STATED LEVEL OF SPECIFICITY. SCHOOL PLANS WILL BE CONGRUENT WITH DIVISION AND DEPARTMENT GOALS AND OBJECTIVES.

THE DIVISION OF SERVICES FOR THE DEAF AND HARD OF HEARING IS REDEFINING ITS DEPUTY POSITION INTO A HUMAN SERVICES EVALUATOR. THERE HAS NOT BEEN ANYONE ON STAFF WITH THE SKILLS NEEDED TO ADDRESS DETAILED PROGRAM EVALUATION, INCLUDING MEASUREMENTS. THE REDEFINED POSITION SHOULD BE ABLE TO ASSIST THE DIVISION DIRECTOR TO IMPROVE THE PLANNING AND EVALUATION FUNCTION. IN ADDITION, THE DIVISION IS HOSTING A SERIES OF COMMUNITY FORUMS TO GATHER PUBLIC INPUT INTO ITS PLANNING. THE FORUMS ARE CO HOSTED BY THE NC COUNCIL FOR THE DEAF AND THE HARD OF HEARING, A STATUTORY BODY THAT IS CHARGED WITH GIVING ADVICE TO DEPARTMENT OF HEALTH AND HUMAN SERVICES ABOUT SERVICES AND PROGRAMS FOR PEOPLE WHO ARE DEAF OR HARD OF HEARING. DSDHH ARE HOLDING FORUMS ON THE FOLLOWING DATES AND LOCATIONS: MARCH 9, RALEIGH, DEPARTMENT OF TRANSPORTATION, MARCH 23, WILSON, WILSON TECHNICAL COMMUNITY

## APPENDIX C

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COLLEGE, APRIL 6, ASHEVILLE, TRINITY EPISCOPAL CHURCH AND APRIL 27, CHARLOTTE, FIRST BAPTIST CHURCH.

**FINDING:** THERE IS A LACK OF COMMUNICATION BETWEEN AND AMONG THE DIVISION, SCHOOLS AND REGIONAL RESOURCE CENTERS.

**RECOMMENDATION:** Lines of authority and responsibility should be clearly identified and communicated to all staff. Organizational reporting lines should be properly adhered to. Each section, school, and RRC should have input into the long-range plan and should be aware of how their actions relate to and impact on all other sections/schools/RRCs. Staff meetings should be scheduled as needed to update staff on new initiatives, changes to policies and procedures, etc.

**RESPONSE:** THE DIVISION OF SERVICES FOR THE DEAF AND HARD OF HEARING HAS ESTABLISHED AN “OPEN-DOOR” COMMUNICATION ENVIRONMENT BETWEEN FIELD STAFF AND ALL OF DIVISION MANAGEMENT. IN ADDITION, QUARTERLY MEETINGS OF STAFF WITH SERVICE DELIVERY SPECIALISTS (E.G. HARD OF HEARING SERVICES CONSULTANTS) ARE NOW BEING SCHEDULED REGULARLY, AFTER A TIME OF INACTIVITY. THE NEW MANAGER OF THE PROGRAM SERVICES MEETS MONTHLY WITH THE RRC MANAGERS. AN ANNUAL STATEWIDE PLANNING MEETING OF ALL STAFF WAS PROPOSED, BUT FUNDING IS NOT AVAILABLE AT THIS TIME. WITH ASSISTANCE FROM THE DIVISION OF INFORMATION RESOURCE MANAGEMENT, THE DIVISION IS DEVELOPING A PLAN TO CONNECT ITS OFFICES ELECTRONICALLY. PRELIMINARY TESTING SHOWS THAT USE OF ONLINE MEETING SOFTWARE CAN BE VERY HELPFUL IN FACILITATING COMMUNICATION AMONG OFFICES STATEWIDE. THIS APPROACH HAS PROVEN TO REDUCE THE COMMUNICATIONS BARRIERS THAT EXIST AMONG HEARING, DEAF, AND HARD OF HEARING STAFF

**FINDING:** THE LACK OF CLEARLY WRITTEN, SPECIFIC POLICIES AND PROCEDURES HAMPERS EFFECTIVE OPERATIONS FOR THE DIVISION AND THE SCHOOLS.

**RECOMMENDATION:** DIVISION MANAGEMENT SHOULD MAKE THE DEVELOPMENT OF A COMPREHENSIVE INTERNAL POLICIES AND PROCEDURES MANUAL, AS WELL AS SPECIFIC POLICIES AND PROCEDURES MANUALS FOR EACH SECTION WITHIN THE DIVISION, A PRIORITY. SPECIFIC, STEP-BY-STEP PROCEDURES SHOULD BE INCLUDED IN EACH SECTION’S MANUAL. A SYSTEM FOR DISTRIBUTING AND UPDATING THESE PROCEDURAL MANUALS SHOULD ALSO BE IMPLEMENTED. ONCE THE PROCEDURES ARE IN PLACE, MANAGEMENT SHOULD ENFORCE STRICT ADHERENCE TO THE PROCEDURES IN ALL AREAS. THE SCHOOLS SHOULD FOLLOW THE SAME POLICIES WHERE APPLICABLE AND SHOULD ALSO INSTITUTE PROCEDURES FOR ANNUAL REVIEW AND REVISION OF THE MANUALS. THE NEW DIVISION OF EARLY INTERVENTION AND EDUCATION SHOULD WORK TO ENSURE CONSISTENCY IN POLICIES AND PROCEDURES USED AT EACH SCHOOL.

**RESPONSE:** THE DIVISION OF EARLY INTERVENTION AND EDUCATION RECOGNIZES THE NEED FOR AN INTERNAL POLICY AND PROCEDURES MANUAL, AS WELL AS THE NEED FOR SCHOOLS TO FOLLOW A SET OF UNIFORM POLICIES. THE DIVISION IS STILL BEING FORMED, AND UNIFORM POLICY AND PROCEDURES ARE BEING WRITTEN. ONCE DEVELOPED, CONSISTENT ADMINISTRATION OF POLICIES WILL BE EXPECTED WITH ANNUAL MONITORING AND REVISIONS.

ALSO, THE DIVISION OF HUMAN RESOURCES IS IN THE PROCESS OF DEVELOPING AND UPDATING PERSONNEL POLICIES AND PROCEDURES FOR DHHS OPERATIONS THAT SERVE AS AN EXTENSION OF STATE PERSONNEL POLICIES WITHOUT BEING DUPLICATIVE.

THE DIVISION OF SERVICES FOR THE DEAF AND HARD OF HEARING HAS OPERATED WITH A DIVISION DIRECTIVE NOTEBOOK. THIS NOTEBOOK IS BEING REPLACED WITH A COMPREHENSIVE DIVISION POLICY AND PROCEDURE MANUAL. COPIES OF THE NEW MANUAL WILL BE PLACED IN ALL OFFICES AND MADE READILY AVAILABLE TO STAFF. EMPLOYEES WILL BE INSTRUCTED IN THE APPLICATION OF THESE POLICIES AND PROCEDURES.

## APPENDIX C

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**FINDING:** THE DIVISION PROVIDES LIMITED GUIDANCE AND SUPERVISION TO THE REGIONAL RESOURCE CENTERS.

**RECOMMENDATION:** The Division should take an active role in providing guidance and supervision to the Regional Resource Centers to ensure reliable, consistent reporting. This should include establishing policies and procedures for all aspects of RRC operation. Service categories should be defined and standards developed for counting services and clients/agencies/organizations. Other methods include establishing guidelines on when it is appropriate to provide services outside the catchment area or refer a client/agency to another RRC.

**RESPONSE:** A NEW STATE MANAGER HAS BEEN HIRED AND IS PROVIDING LEADERSHIP AND GUIDANCE TO THE RRCs. SHE HAS FOCUSED THE RRC MANAGERS ON THE ISSUE OF DEFINING SERVICES AND PREPARING AND SUBMITTING QUARTERLY REPORTS CONSISTENTLY. THIS EFFORT WILL BE HELPED GREATLY WHEN THE HUMAN SERVICES EVALUATOR POSITION IS APPROVED AND FILLED.

**FINDING:** TRAINING NEEDS OF DIVISION AND SCHOOL PERSONNEL ARE NOT BEING MET.

**RECOMMENDATION:** DIVISION AND SCHOOL MANAGEMENT SHOULD ESTABLISH A FORMAL TRAINING PROGRAM. FIRST, MANAGEMENT SHOULD CRITICALLY ASSESS THE TRAINING NEEDS OF ALL STAFF AND COMPARE THOSE NEEDS TO THE AVAILABLE RESOURCES. A TRAINING PLAN SHOULD BE DEVELOPED FOR THE DIVISION AND EACH SCHOOL AND SPECIFIC COURSES SHOULD BE MADE AVAILABLE TO ALL STAFF BASED ON NEEDS IDENTIFIED THROUGH THE PERFORMANCE MANAGEMENT PROGRAM. MANAGEMENT SHOULD PRIORITIZE TRAINING NEEDS IN THE BIENNIAL BUDGET PROCESS AND ACQUIRE FUNDS FOR THIS ENDEAVOR. FINALLY, A TRACKING SYSTEM SHOULD BE DEVELOPED TO MONITOR PROGRESS TOWARD ACHIEVING THE TRAINING GOALS.

**RESPONSE:** THE DIVISION OF EARLY INTERVENTION AND EDUCATION HAS RECENTLY ESTABLISHED A DIRECTOR OF STAFF DEVELOPMENT. THIS POSITION WILL BE RESPONSIBLE FOR COORDINATING BOTH PROGRAM AND MANDATED TRAINING WITHIN THE DIVISION. IN ADDITION, EACH OF THE SCHOOLS FOR THE DEAF HAS A STAFF DEVELOPMENT SPECIALIST POSITION THAT HAS BEEN DEDICATED TO TEACHING SIGN LANGUAGE EXCLUSIVELY. JOB RESPONSIBILITIES AND AREAS OF EMPHASIS WILL BE REVISED AS A PART OF THE UPCOMING STANDARDIZATION OF O CHARTS.

THE DIVISION OF HUMAN RESOURCES HAS PROVIDED TRAIN-THE-TRAINER OPPORTUNITIES TO THE STAFF DEVELOPMENT POSITIONS IN THE PAST TO EQUIP THEM WITH THE SKILLS TO PROVIDE TRAINING ON MANDATED AND SUPERVISORY TRAINING. A TRAIN-THE-TRAINER CLASS USING THE INTERACTION MANAGEMENT TRAINING MATERIALS WILL BE SCHEDULED THE THIRD QUARTER OF THE CALENDAR YEAR FOR DIVISION STAFF DEVELOPMENT POSITIONS. IN ADDITION, TRAIN-THE-TRAINER CLASSES WILL BE HELD WITH SCHOOL PERFORMANCE MANAGEMENT COORDINATORS DURING THIS SAME PERIOD.

THE HR DIVISION SURVEYED A REPRESENTATIVE SAMPLE OF SUPERVISORS AND MANAGERS THE FALL OF 1999 TO IDENTIFY THEIR TRAINING NEEDS. THIS NEEDS ASSESSMENT IS DRIVING A REVIEW OF CURRENT MATERIALS COVERED IN THE INTRODUCTION TO SUPERVISION [3 TRAINING MODULES]. SCHOOL DIRECTORS ALSO MEET WITH THE SUPERINTENDENT MONTHLY TO SHARE PROFESSIONAL EXPERTISE IN ADDRESSING ISSUES.

DHHS DIRECTIVE 34 [PERFORMANCE MANAGEMENT POLICY] REQUIRES EACH EMPLOYEE BE OFFERED A DEVELOPMENT PLAN TO HELP HIM/HER DEFINE THE KNOWLEDGE AND SKILLS NEEDED TO REMAIN COMPETENT OR COMPETITIVE IN HIS/HER JOB. EACH DIVISION SUPERVISOR SHOULD BE REMINDED THAT DEVELOPMENT OF WORKPLANS WITH EMPLOYEES AND THE CONDUCTING OF INTERIM AND FINAL EVALUATIONS ARE A POLICY REQUIREMENT.

THE DEPARTMENT HAS JUST COMMITTED TO THE PURCHASE OF SOFTWARE THAT WILL TRACK TRAINING, ALLOW ON-LINE REGISTRATION AND GENERATE STATISTICAL REPORTS. THIS SOFTWARE WILL ENABLE THE

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INDIVIDUAL SCHOOLS AND DIVISION MANAGEMENT TO MONITOR PROGRESS ON ACHIEVING TRAINING GOALS. SUPERVISORS WILL HAVE ACCESS TO ON-LINE PROGRAMS THAT PROVIDE JOB-COACHING INFORMATION ON A VARIETY OF TOPICS.

THE DIVISION OF HUMAN RESOURCES HAS PARTNERED WITH OSP TO PILOT NEW PERFORMANCE MANAGEMENT PRODUCTS FOR MANAGERS, SUPERVISORS AND EMPLOYEES. PILOTS WERE CONDUCTED JOINTLY WITH OSP, WHICH INCLUDED PARTICIPANTS IN MANAGEMENT AND STAFF POSITIONS IN DHHS HUMAN RESOURCES. PILOT TRAINING WAS ALSO CONDUCTED IN THE FALL OF 1999 WITH THE DHHS EXECUTIVE MANAGEMENT TEAM. AS OF MARCH 3, FUNDING FOR THE PURCHASE OF NEW PERFORMANCE TRAINING MATERIALS AND AN AUTOMATED TRACKING SYSTEM FOR TRAINING HAS BEEN APPROVED. ONCE THE DIVISION TRAINERS ARE CERTIFIED THEY WILL HAVE ACCESS TO OVER 50 MANAGEMENT AND EMPLOYEE DEVELOPMENT MODULES. SINCE IN-SERVICE EDUCATION DAYS ARE LIMITED, STAFF MAY ALSO TAKE ADVANTAGE OF THESE MODULES IN WORKBOOK AND CD-ROM FORMATS. IN ADDITION, A STAFF DEVELOPMENT POSITION WAS RECENTLY MOVED TO THE CENTRAL OFFICE OF HUMAN RESOURCES WHERE IT WILL CONCENTRATE ON THE DELIVERY OF NEW PERFORMANCE TRAINING PRODUCTS AND DISTANCE LEARNING.

EMPLOYEE ORIENTATION IS A SHARED RESPONSIBILITY BETWEEN MANAGEMENT AND HUMAN RESOURCES. IN THIS AREA, HUMAN RESOURCES HAS AN ORIENTATION GUIDE IN DRAFT FORM FOR DHHS HUMAN RESOURCE OFFICES THAT SERVES TO DOCUMENT INFORMATION TO BE COVERED WITH NEW EMPLOYEES, E.G., BENEFITS, WORK STATION, HOURS OF WORK, WORKPLACE HARASSMENT LAWS, ETC., THIS GUIDE WILL SERVE TO DOCUMENT THAT NEW EMPLOYEES HAVE RECEIVED AN ORIENTATION AND CONFIRM THAT THEY UNDERSTAND THE INFORMATION BY ACKNOWLEDGEMENT OF SIGNATURE WITH THE INFORMATION THEN FILED IN THEIR PERSONNEL FILE. THIS GUIDE WILL BE AVAILABLE THE SECOND QUARTER OF THIS CALENDAR YEAR.

THE DIVISION OF SERVICES FOR THE DEAF AND HARD OF HEARING HAS ASSIGNED A POSITION TO ASSESS TRAINING NEEDS FOR ALL STAFF, DEVELOP TRAINING PLANS, ARRANGE OR PROVIDE ALL STATE AND DEPARTMENT MANDATED TRAINING, ARRANGE PROFESSIONAL DEVELOPMENT TRAINING, AND MAINTAIN TRAINING RECORDS ON ALL STAFF. ASSESSMENTS WILL BE COMPLETED BY THE END OF MARCH, 2000. TRAINING PLANS WILL BE DEVELOPED AFTER THE ASSESSMENTS, AND TRAINING WILL BE PROVIDED AS RESOURCES PERMIT.

**FINDING:** THE SCHOOLS DO NOT HAVE AN EFFECTIVE WORK ORDER SYSTEM IN PLACE.

**RECOMMENDATION:** WORK ORDER POLICIES AND PROCEDURES SHOULD BE DEVELOPED. THE POLICIES AND PROCEDURES SHOULD OUTLINE THE TYPE OF WORK THAT WARRANTS PREPARING A WORK ORDER, HANDLING OF ROUTINE AND SPECIAL WORK REQUESTS, VOIDING OF WORK ORDERS, ASSIGNING BATCHES OF BLANK WORK ORDERS, ETC. THE SCHOOLS SHOULD DEVELOP AND IMPLEMENT A COMPUTERIZED TRACKING AND MONITORING SYSTEM FOR WORK ORDERS WHICH ALLOWS MANAGEMENT TO ASSESS QUALITY OF WORK PERFORMED, FREQUENCY OF REQUESTS, AND ALLOWS FOR THE ACCOUNTABILITY OF INVENTORY. FINALLY, THE SCHOOLS SHOULD INCREASE THEIR BUDGETARY REQUESTS FOR REPAIR AND MAINTENANCE TO PROVIDE ADEQUATE FUNDING FOR PREVENTIVE MAINTENANCE TO ENSURE THE SAFETY OF ITS STAFF AND EQUIPMENT.

**RESPONSE:** THE DIVISION OF EARLY INTERVENTION AND EDUCATION WILL SEEK GUIDANCE FROM THE DIVISION OF PROPERTY AND CONSTRUCTION IN THE DEVELOPMENT OF POLICIES AND PROCEDURES FOR WORK ORDERS.

**FINDING:** EMPLOYEE FILES DID NOT CONTAIN ADEQUATE DOCUMENTATION TO SUPPORT CERTAIN PERSONNEL ACTIONS.

**RECOMMENDATION:** DIVISION AND SCHOOL MANAGEMENT SHOULD ENSURE PERSONNEL FILES COMPLY WITH OSP REGULATIONS AND DEPARTMENT POLICY BY CONTAINING ALL RELEVANT RECORDS FOR EACH EMPLOYEE. IN ADDITION, EACH PERSONNEL OFFICE SHOULD REVIEW ALL FILES TO ENSURE THAT ALL NECESSARY DOCUMENTS ARE RETAINED TO SUPPORT HIRING DECISIONS AND REDUCE THE POTENTIAL FOR GRIEVANCES OR

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LAWSUITS. SCHOOL MANAGEMENT SHOULD ENSURE THAT ALL PROMOTIONAL OPPORTUNITIES ARE POSTED AND COMPLY WITH OSP REGULATIONS. LASTLY, MANAGEMENT SHOULD ENSURE THAT ALL PERSONNEL DOCUMENTATION IS SECURELY LOCATED WITHIN THE PERSONNEL OFFICE TO REDUCE THE POSSIBILITY FOR LOST OR DESTROYED DOCUMENTATION.

**RESPONSE:** THE DIVISION OF HUMAN RESOURCES HAS IN DRAFT STAGE THE DEVELOPMENT OF AN AUDIT PROGRAM FOR GAUGING THE QUALITY OF DIVISION AND INSTITUTION HR PROGRAMS AND COMPLIANCE WITH RELEVANT POLICIES AND PROCEDURES. THE AUDITS WILL BE CONDUCTED BY PROGRAM EXPERTS WITHIN THE HR DIVISION AND WILL INCLUDE ALL HR FUNCTIONAL AREAS SUCH AS CLASSIFICATION AND PAY, EMPLOYEE SAFETY AND HEALTH, EMPLOYMENT AND MANAGEMENT DEVELOPMENT, RECRUITMENT, WORK/LIFE AND BENEFITS, EMPLOYEE RELATIONS AND GENERAL HR MANAGEMENT. THE TARGET DATE FOR IMPLEMENTATION IS BY THE END OF THE SECOND QUARTER OF THIS CALENDAR YEAR. HENCEFORTH, AUDITS WILL BE CONDUCTED PERIODICALLY BY EACH HR FUNCTIONAL PROGRAM.

IN ADDITION, A STRUCTURED MENTORING PROGRAM IS IN DRAFT FORM AND IS TARGETED FOR IMPLEMENTATION IN THE SECOND QUARTER OF THIS YEAR. THIS PROGRAM WILL PROVIDE MUCH NEEDED TRAINING AND ORIENTATION TO NEW HR EMPLOYEES TO BETTER SERVE EMPLOYEES IN THE DIVISIONS AND INSTITUTIONS.

DOCUMENTATION PROCEDURES FOR FILE MAINTENANCE OF DRUG TESTING IN COMPLIANCE WITH DHHS DIRECTIVE 47 AND CRIMINAL BACKGROUND CHECKS IN COMPLIANCE WITH GS 114-9.6 WILL BE REVIEWED WITH ALL DIVISIONS BY APRIL 1, 2000. PERSONNEL RECORDS FOR COMPLIANCE WILL BE REVIEWED ANNUALLY BY THE DIVISION OF HUMAN RESOURCES.

**FINDING:** ANNUAL PERFORMANCE EVALUATIONS WERE NOT COMPLETED AS REQUIRED BY STATE PERSONNEL POLICY.

**RECOMMENDATION:** PERFORMANCE MANAGEMENT IS AN INTEGRAL PART OF TOTAL MANAGEMENT, INFLUENCING THE SELECTION, STAFFING, DISCIPLINE, TRAINING, AND DEVELOPMENT OF AN AGENCY AND ITS EMPLOYEES. THE DEPARTMENT, DIVISION AND SCHOOL SHOULD MAINTAIN AN OPERATIVE PERFORMANCE MANAGEMENT SYSTEM AS REQUIRED BY STATE REGULATIONS. THE DIVISION OF SCHOOL MANAGEMENT SHOULD ENSURE THAT ALL SUPERVISORS COMPLETE EMPLOYEE EVALUATIONS TIMELY. IN ADDITION, THE DIVISION AND SCHOOL MANAGEMENT SHOULD INFORM ALL STAFF THAT PERFORMANCE APPRAISALS ARE NOT TO BE COMPLETED BY THE EMPLOYEES BUT BY THE APPROPRIATE SUPERVISOR.

**RESPONSE:** IN FEBRUARY, ALL DHHS PERFORMANCE MANAGEMENT COORDINATORS MET TO REVIEW THE REPORTING REQUIREMENTS OF THE PERFORMANCE MANAGEMENT PROGRAM. AGENCIES WERE REQUESTED TO PROVIDE A COPY OF THEIR INDIVIDUAL MONITORING PLANS TO THE HR DIVISION BY MAY 1 AND TO COMPLETE THEIR ANNUAL MONITORING BY AUGUST 1. AT THE END OF EACH PERFORMANCE MANAGEMENT CYCLE, THE HR OFFICES RECONCILE THEIR ENTRY OF PMS RATINGS INTO PMIS. BEGINNING THIS YEAR, THE DIVISION OF HUMAN RESOURCES WILL REQUIRE THAT THE AGENCY DIRECTOR VERIFY WITH THEIR MANAGERS THAT ALL EVALUATIONS HAVE BEEN COMPLETED, THAT WORK PLANS HAVE BEEN RECEIVED BY THE HR OFFICES AND RATINGS ENTERED INTO PMIS. AT THE SAME TIME, HUMAN RESOURCES STAFF SHALL NOT ENTER PERFORMANCE MANAGEMENT RATINGS UNLESS A COMPLETED WORKPLAN WITH A FINAL RATING IS SUBMITTED TO THE HR OFFICE. UPON THE CONCLUSION OF THE PERFORMANCE CYCLE, A PROGRAM EVALUATION WILL BE CONDUCTED AT THE SCHOOLS TO REVIEW THE QUALITY OF THE WORKPLANS AND COMPLIANCE TO POLICY.

CENTRAL SCHOOL HAS AN ON-SITE PERFORMANCE MANAGEMENT TRAINER. THE DEIE WILL HAVE STAFF DEVELOPERS AT ENCSD AND NCSD BECOME CERTIFIED TRAINERS IN PERFORMANCE MANAGEMENT TO PROVIDE TRAINING AND REFRESHER TRAINING TO NEW SUPERVISORS.

CURRENT STATE POLICY AND DHHS DIRECTIVE 34 RECOMMENDS THAT SUPERVISORS ENCOURAGE THEIR EMPLOYEES TO PROVIDE DOCUMENTATION FOR THE FINAL EVALUATION. WHILE THE SUPERVISOR MUST MEET WITH THE EMPLOYEE AND REVIEW THE EMPLOYEE 'S DOCUMENTATION AS WELL AS THEIR OWN DATA,

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**THERE IS NOTHING IN EITHER POLICY THAT PROHIBITS EMPLOYEES FROM DRAFTING THE FINAL PERFORMANCE EVALUATION IF BOTH THE SUPERVISOR AND THE EMPLOYEE AGREE TO THE EVALUATION.**

**THE DIVISION OF SERVICES FOR THE DEAF AND HARD OF HEARING STAFF DEVELOPMENT COORDINATOR IS A CERTIFIED PERFORMANCE MANAGEMENT (PM) TRAINER WHO HAS BEGUN SCHEDULING PERFORMANCE MANAGEMENT TRAINING DIVISION WIDE.**

**FINDING:** THE TIME KEEPING SYSTEM DOES NOT ACCURATELY REFLECT TIME WORKED OR LEAVE BALANCES.

**RECOMMENDATION:** MANAGEMENT SHOULD IMMEDIATELY ESTABLISH ONE EFFECTIVE TIME-KEEPING SYSTEM TO BE USED BY ALL LOCATIONS. EVERY EMPLOYEE SHOULD BE RESPONSIBLE FOR DOCUMENTING HIS OR HER TIME WORKED AND LEAVE EARNED/TAKEN. SUPERVISORS SHOULD BE RESPONSIBLE FOR OBSERVING EMPLOYEE WORK HABITS AND APPROVING COMPLETED TIME SHEETS. EMPLOYEES, SUPERVISORS, AND THE PAYROLL CLERK SHOULD CONDUCT A MORE THOROUGH REVIEW OF MONTHLY TIME SHEETS. MANAGEMENT SHOULD FOLLOW ALL POLICIES IMPLEMENTED TO SET AN EXAMPLE FOR STAFF.

**RESPONSE:** ONE TIME-KEEPING SYSTEM WILL BE IDENTIFIED AND ITS USE INSTITUTIONALIZED WITHIN THE DIVISION OF EARLY INTERVENTION AND EDUCATION. CLEAR AND CONSISTENT POLICIES AND PROCEDURES WILL BE DESIGNED AND UTILIZED ACROSS THE DIVISION. THE BUSINESS MANAGER AT EACH SCHOOL WILL DESIGNATE ONE PAYROLL CLERK TO BE RESPONSIBLE FOR AUDITING TIME SHEETS. TRAINING OF DIVISION STAFF WILL BE PROVIDED.

**THE VR HR OFFICE IS WORKING WITH DSDHH MANAGEMENT TO ESTABLISH UNIFORM POLICIES AND PROCEDURES GOVERNING TIME KEEPING. A TIMEKEEPER WILL BE APPOINTED IN EACH OFFICE LOCATION. TRAINING AND WRITTEN INSTRUCTIONS WILL BE PROVIDED. THE VR HR OFFICE WILL PERFORM PERIODIC AUDITS OF THE PROCESS TO ASSURE COMPLIANCE.**

**FINDING:** INTERNAL CONTROLS AT THE SCHOOLS ARE INADEQUATE TO ENSURE THE ACCURACY OF OVERTIME, SHIFT PREMIUM, AND HOLIDAY PAYMENTS.

**RECOMMENDATION:** THE PAYROLL CLERKS AT EACH SCHOOL SHOULD COMPARE THE SUPPORTING DOCUMENTATION TO THE PAYROLL REGISTER TO VERIFY THAT ALL APPLICABLE EMPLOYEES ARE INCLUDED. THE DEPARTMENT SHOULD REVIEW THE ACCURACY OF THE DATA ENTERED INTO THE PAYROLL SYSTEM AND THE CALCULATIONS CONTAINED WITHIN THE PAYROLL SYSTEM.

**RESPONSE:** THE DIVISION OF HUMAN RESOURCES WILL DEVELOP A SALARY ADMINISTRATION GUIDE FOR PAYROLL CLERKS. HUMAN RESOURCES WILL OUTLINE THE OSP POLICIES THAT GOVERN THE VARIOUS PAY PROVISIONS THAT ARE AFFORDED TO CERTAIN CLASSIFICATIONS AND WORK SETTINGS. THE TIMEFRAME FOR COMPLETING THE GUIDE WILL BE THE THIRD QUARTER OF THE CALENDAR YEAR.

**THE BUSINESS OFFICE OF THE DIVISION OF EARLY INTERVENTION AND EDUCATION WILL ESTABLISH A PROCEDURE FOR ON-SITE PAYROLL CLERKS TO FOLLOW IN REVIEWING TIME SHEETS TO ASSURE COMPLIANCE WITH OSP POLICIES AND THE SALARY ADMINISTRATION GUIDE.**

**FINDING:** CERTAIN ENSD POSITIONS ARE MISCLASSIFIED AND SOME CERTIFIED STAFF ARE BEING PAID INCORRECTLY.

**RECOMMENDATION:** THE DEPARTMENT'S DIVISION OF HUMAN RESOURCES SHOULD REVIEW THE RESPONSIBILITIES OF THE STUDENT SUPPORT SERVICES PRINCIPAL AND THE HIGH SCHOOL PRINCIPAL. THIS REVIEW SHOULD DETERMINE THE ACTUAL REPORTING LINES AND RESPONSIBILITIES AND THE PROPER PAY CLASSIFICATION. CLASSIFICATION TITLES AND RESULTING PAY GRADES SHOULD BE REPRESENTATIVE OF THE ACTUAL DUTIES ASSIGNED TO THE POSITION. CHANGES MADE AS A RESULT OF THE REVIEW IN TITLE CLASSIFICATIONS OR LINES OF AUTHORITY SHOULD BE PROMPTLY COMMUNICATED TO ALL APPLICABLE STAFF. ADDITIONALLY, THE SCHOOL'S PERSONNEL OFFICE SHOULD REVIEW ALL PAYROLL SYSTEM INFORMATION TO

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VERIFY THAT THE CORRECT DATA HAS BEEN ENTERED. THE PERSONNEL OFFICE SHOULD COMPARE INFORMATION IN THE DPI LICENSE AND SALARY INFORMATION CENTER DATABASE TO SCHOOL RECORDS TO ENSURE ACCURACY. ALL STAFF BEING PAID INCORRECTLY SHOULD BE NOTIFIED AND THE INACCURATE PAYMENTS CORRECTED.

**RESPONSE:** WITHIN THE PAST SIX MONTHS, THE DIVISION OF HUMAN RESOURCES HAS CONDUCTED AND COMPLETED CLASSIFICATION STUDIES IN TWO AREAS IN ORDER TO UPDATE CURRENT JOB DESCRIPTIONS AND CLASSIFICATIONS. THESE STUDIES INCLUDED SCHOOL ADMINISTRATOR AND RESIDENTIAL LIFE POSITIONS, WHICH TOTALED APPROXIMATELY 250 POSITIONS. NEXT TO BE EVALUATED ARE PRINCIPAL AND ASSISTANT PRINCIPAL CLASSIFICATION CONCEPTS.

IN THE SCHOOL ADMINISTRATOR STUDY, THE RE-EVALUATION OF EDUCATOR CREDENTIALS IS A PART OF THE PROCESS AND IS CURRENTLY BEING CONDUCTED BY THE DIVISION OF EARLY INTERVENTION AND EDUCATION [DEIE]. THE REORGANIZATION OF THE DEIE WILL REQUIRE ADDITIONAL JOBS EVALUATED WHICH HUMAN RESOURCES WILL CONDUCT AS NEW ROLES AND REASSIGNED DUTIES ARE DEVELOPED BY MANAGEMENT AND AS POSITION DESCRIPTIONS ARE PREPARED.

**FINDING:** THE DIVISION AND SCHOOLS ARE NOT COMPLYING WITH STATE REGULATIONS ON ANNUAL BUDGETS.

**RECOMMENDATION:** THE SCHOOLS SHOULD COMPLY WITH ALL THE PROVISIONS OF THE STATE BUDGET MANUAL INCLUDING RETAINING BUDGET RECORDS. MANAGEMENT SHOULD ENSURE THAT A DETAILED TRANSACTION LEDGER IS MAINTAINED AT EACH SCHOOL. ANNUAL BUDGET PLANNING SHOULD INCLUDE VARIANCE ANALYSIS, ESTABLISHING THE BUDGET, AND BUDGET REVIEW CONSISTENT WITH GENERAL BUSINESS PRACTICES. THE DEPARTMENT SHOULD ENSURE THAT THE DIVISION IS INFORMED ON ALL BUDGETARY TRANSACTIONS AND THE SCHOOLS SHOULD LIKEWISE IMPLEMENT A POLICY TO INFORM THE DIVISION OF ALL INCOMING FUNDS. STAFF SHOULD BE ADEQUATELY TRAINED AND OVERSEEN TO PREVENT THESE ERRORS FROM CONTINUING.

**RESPONSE:** IN REVIEWING SCHOOL-LEVEL BUDGET ISSUES, THERE IS A CLEAR NEED FOR TRAINING, CONSISTENCY AND OVERSIGHT. EFFECTIVE MAY 1, 2000, SCHOOL BUSINESS MANAGERS WILL REPORT DIRECTLY TO THE DIVISION OF EARLY INTERVENTION AND EDUCATION BUSINESS DIRECTOR. THERE WILL BE A DOTTED LINE REPORTING RELATIONSHIP TO SCHOOL DIRECTORS WHO WILL COLLABORATE WITH THE DIVISION BUSINESS DIRECTOR IN PERFORMANCE MANAGEMENT REVIEWS.

SCHOOL BUSINESS PERSONNEL WILL BE EXPECTED TO ENSURE SCHOOL-WIDE COMPLIANCE WITH THE PROVISIONS OF THE STATE BUDGET MANUAL. ON-GOING TRAINING, MONITORING AND DEVELOPMENT OF BUDGET PROCEDURES WILL BE PROVIDED BY THE DIVISION BUSINESS DIRECTOR.

**FINDING:** THE REGIONAL RESOURCE CENTERS EXPERIENCE DELAYS IN RECEIVING SUPPLIES, MATERIALS, AND EQUIPMENT PURCHASED THROUGH THE DIVISION OFFICE.

**RECOMMENDATION:** The Department should pursue authorization to use procurement cards for its various divisions. Each RRC would assign responsibility for the procurement card to one person who would make the purchases. The monthly statements would be sent directly to the Division and the RRC would forward supporting documentation to the Division. The Division would reconcile to the monthly statement and review the documentation to ensure reasonableness and the necessity of all purchases.

**RESPONSE:** REORGANIZATION WILL CREATE A NEW STRUCTURE IN WHICH MUCH OF THE PURCHASING PROCESS WILL BECOME THE RESPONSIBILITY OF THE RRC MANAGERS, WITH SUPPORT FROM THE BUSINESS STAFF OF THE DIVISION OF SERVICES FOR THE BLIND.

**FINDING:** THERE ARE WEAKNESSES IN THE ACCOUNTABILITY AND MAINTENANCE OF FIXED ASSETS.

**RECOMMENDATION:** THE DIVISION SHOULD COMPLETE WRITTEN INTERNAL PROCEDURES FOR FIXED ASSET MANAGEMENT AND PROVIDE THEM TO ALL EMPLOYEES, AS WELL AS PROVIDE FIXED ASSET MANAGEMENT TRAINING TO ALL EMPLOYEES ENGAGED IN THIS FUNCTION. PROPER DOCUMENTATION FOR RELOCATING OR

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SURPLUSING FIXED ASSETS SHOULD BE MAINTAINED AND ADDITIONS, DELETIONS, AND MODIFICATIONS TO THE FIXED ASSET INVENTORY SHOULD BE MADE TIMELY TO KEEP THE INVENTORY ACCURATE. THE DEPARTMENT SHOULD DELEGATE THE RESPONSIBILITY OF RECORDING, DELETING, AND MODIFYING THE FIXED ASSET INVENTORY DIRECTLY TO THE FIXED ASSET OFFICER AT EACH SCHOOL AND REGIONAL RESOURCE CENTER.

**RESPONSE:** THE DIVISION OF EARLY INTERVENTION AND EDUCATION BUSINESS DIRECTOR WILL ASSURE THAT SCHOOL BUSINESS MANAGERS OBTAIN AND UNDERSTAND FIXED ASSET POLICIES. A CONSISTENT PROCESS WILL BE DESIGNED AND A PERSON WITHIN THE SCHOOL BUSINESS OFFICE WILL BE DESIGNATED AND HELD ACCOUNTABLE FOR MAINTAINING AN ACCURATE AND CURRENT FIXED ASSET INVENTORY.

THE DIVISION OF DEAF AND HARD OF HEARING IS ESTABLISHING A CONSISTENT PROCESS FOR MAINTAINING AND TRACKING THE FIXED ASSET INVENTORY. A SINGLE INDIVIDUAL IS BEING ASSIGNED THIS RESPONSIBILITY. THIS INDIVIDUAL WILL WORK WITH THE RRC MANAGERS WHO WILL HAVE SITE RESPONSIBILITY FOR FIXED ASSETS IN THEIR INVENTORIES.

**FINDING:** THE SCHOOLS DID NOT ESTABLISH CONTRACTS FOR ALL PRESCHOOL SATELLITE FACILITIES.

**RECOMMENDATION:** THE SCHOOLS SHOULD ESTABLISH CONTRACTS FOR ALL SATELLITE PRESCHOOL LOCATIONS REGARDLESS OF COSTS. THESE CONTRACTS SHOULD INCLUDE LIABILITY DESIGNATION, OWNERSHIP OF EQUIPMENT, AND INSURANCE COVERAGE.

**RESPONSE:** THE DIVISION OF EARLY INTERVENTION AND EDUCATION CONTRACT ADMINISTRATOR WITH THE BUSINESS OFFICE WILL ENSURE THAT ALL PRESCHOOL SITES HAVE APPROPRIATE EXECUTED CONTRACTS FOR THE 2000-2001 SCHOOL YEAR.

**FINDING:** THE DIVISION DID NOT COMPLY WITH STATE REGULATIONS REGARDING DOCUMENTATION OF PERSONAL SERVICE CONTRACTS.

**RECOMMENDATION:** THE DIVISION SHOULD EXAMINE ITS CURRENT PROCEDURES FOR APPROVING AND DOCUMENTING ITS PERSONAL SERVICE CONTRACTS. PROVIDING OVERSIGHT TO THE PURCHASING SYSTEM IS AN INTEGRAL PART OF TOTAL MANAGEMENT. THE DIVISION SHOULD ESTABLISH PROCEDURES TO DOCUMENT ITS EFFORTS FOR SOLICITING COMPETITIVE BIDDING FOR CONTRACTS AND ANY POTENTIAL CONFLICTS THAT MAY EXIST WHEN APPROVING CONTRACTS. THE DIVISION SHOULD COMPLY WITH STATE PURCHASING REGULATIONS WITH REGARD TO SOLE SOURCE CONTRACTS AND CONTRACT FILE DOCUMENTATION.

**RESPONSE:** ALTHOUGH PERSONAL SERVICE CONTRACTS ARE A DHHS PURCHASE AND CONTRACT RESPONSIBILITY, THE DIVISION OF HUMAN RESOURCES HAS RESPONSIBILITY FOR THE APPROVAL OF PERSONAL SERVICE CONTRACTS AS IT RELATES TO EMPLOYER/EMPLOYEE RELATIONSHIP AND PROPOSED SALARY. THE DIVISION OF HUMAN RESOURCES, AS A PART OF ITS AUDIT PROCESS DESCRIBED ABOVE, WILL REVIEW PERSONAL SERVICE CONTRACTS TO ENSURE LOCAL HR OFFICES HAVE REVIEWED CONTRACTS USING APPROPRIATE CRITERIA, THAT FILES ARE MAINTAINED ON CONTRACT DURATION AND SALARY RATE AND THAT APPROPRIATE APPROVAL WAS RECEIVED. THE DIVISION OF HUMAN RESOURCES WILL ISSUE PROCEDURES BY THE END OF THE SECOND QUARTER OF THIS YEAR.

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APRIL 13, 2000

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