

**Pohnpei State Special Education Program  
Annual Verification Monitoring Report**

**May 26-30, 2014**

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**Introduction**

The Federated States of Micronesia (FSM) National Department of Education (NDOE) receives funding under Part B the Individuals with Disabilities Education Act (IDEA) through the U.S. Department of Education. This funding is designed to supplement the provision of special education and related services for eligible children with disabilities within each State of the FSM. In addition, the funds are being used to improve and expand programs and services for children with disabilities in the four states. The special education and related services implemented by use of the IDEA funds are consistent with the approved FSM Special Education Handbook (2012) and FSM P.L. 14-08.

Under the requirements of IDEA, the FSM Government has assured the grantor that all children with disabilities will receive a Free Appropriate Public Education (FAPE) consistent with the requirements of IDEA. The FSM Special Education Program, operated through the Department of Education, contains specific requirements and provisions for funding special education program within each State. In receiving funding under IDEA, each state must assure that the provisions of Public Law 14-08 and the requirements of IDEA, Part B are being fulfilled. Additionally, to be eligible for IDEA funding, each State must annually submit a Special Education LEA Application that includes specific Assurances for the delivery of special education and related services, a Local Performance Plan (LPP) and a detailed budget for the coming school year.

Under the General Supervision requirements of IDEA, the FSM National Department of Education (NDOE) implements a comprehensive Special Education

Monitoring program to ensure compliance in each FSM State with IDEA and to provide student performance data that will assist in making determinations for each state. For FY 2014, the National Special Education Program will conduct an on-site comprehensive review of each State's special education service delivery and their progress in correcting previously identified Findings of Non Compliance to ensure that the requirements of the program as mandated by IDEA, FSM and State procedures are complied with. To this end, this year's on-site monitoring for Pohnpei State will have specific focus on the areas fiscal management, Free Appropriate Public Education (FAPE), and Individualized Education Plan (IEP), as these were areas of non-compliance found last year and were corrected within the one year timeline. The monitoring team will verify that previously corrected areas of non-compliance still meet requirements.

The Monitoring Team conducted the Pohnpei State Special Education Annual Verification Monitoring on-site visit from May 26-30, 2014. The members of the Monitoring Team included Ethel James, Compliance Monitor and Evaluator for FSM Special Education Program, Anseliter Fredrick, Fiscal Officer for FSM Special Education Program, Cynthia Saimon, ECSE Coordinator for FSM Special Education Program,

This Monitoring Report presents findings based on meetings/interviews with parents, program staff, school principals, and the Advisory Council (AC). In addition, the team reviewed student records, financial records, and other program records/documents. This report details the Findings of Monitoring Team including Commendations, Recommendations, and 3 new Findings of Non-Compliance. For each new Finding of Non-Compliance, specific Corrective Actions are described that Pohnpei State must complete within one year of the date of this report.

### **Monitoring Process**

The Monitoring process represents a continuing partnership between the National Department of Education and each State Department of Education to improve and expand high quality special education programs and services. The Monitoring Team first paid a courtesy visit to Joseph Villazon, Director of Education to present the team and an overview of the monitoring purposes and plan. Immediately thereafter, the Monitoring

Team met with Pohnpei Special Education Central staff for an overview of the week's plan, and to finalize the agenda. The team appreciates the usual hospitality and warm welcome by Director Villazon and his high regards of the team's intent and purposes to improve services for children with disabilities throughout the state school system and at homes.

The Monitoring Team followed a process of meeting with Special Education central office staff to review records and conduct interviews related to the Local Education Agency (LEA, in this case is PDOE) Monitoring Checklist, meeting with parents, special education resource room (RR) teachers and Interagency Agreement Council members, and conducting school site visits. The Agenda for the Monitoring activities and Summary of Findings of Non Compliance and Corrective Actions are attached to this report.

### **Program Status**

The Monitoring Team met with the Pohnpei Department of Education Special Education central office staff to review the current status of the special education program. Part of this review included interviewing staff and reviewing documents and reports. In general, the team was pleased to note that the special education program continues to be administered in a manner that ensures improvement towards meeting IDEA, FSM and State regulations and procedures towards implementing the program's procedural manual. However, the team noted that there is a need to improve practices in providing Free Appropriate Public Education (FAPE), general supervision of maintaining and completing student record forms, ensuring consistency and validity of data between office records and the Student Information Tracking System (SITS) database, and including implementing fiscal management procedures pertaining to collection of competitive price quotations for maintenance and repair of Pohnpei State Special Education Program office vehicles. Details of these areas of concern will follow in the Findings of Non Compliance and Corrective Actions section of the report.

The total student enrollment of Pohnpei public schools for this monitoring school year is 10,275 compared to 10,451 in SY 12-13. This represented a reduction of 176

students or a 2% reduction in the school population compared to the previous year. The monitoring team was not able to determine the cause of this decrease in student enrollment but will continue to work with the LEA to ensure a process is in place to account for year to year changes in student population and enrollment with regards to the general population and that of the special education program.

Total IEP student enrollment in 2012-2013 was 720. This number was the December 1, 2012 count extracted from SITS, verified with local data reports, and reported in the FSM FFY2012 Annual Performance Report. The total IEP student enrollment in 2013-2014 taken from the December 1, 2013 count was 716. This represents 4 less students, a 0.5% decrease compared to the 2% decrease of the general student population. The LEA is to be commended for increasing the percentage of IEP student enrollment in 2013-2014 to 6.9% (716/10,275) from 6.8% (720/10,451) in 2012-2013. It is evident that Pohnpei continues their active efforts to comply with the referral and identification process to ensure that children with special needs are identified and provided with appropriate services.

At the beginning of SY2013-2014 from September 1, 2013 to this monitoring week ending on May 30, 2014, a total of 72 new referrals were made. Based on SITS and other documents reviewed, all 72 referrals went through the screening process and all 72 were determined to be eligible students with learning disabilities needing special education and related services. Based on a SITS My Report printout, all 72 referrals met the 60-day timeline requirement. Again, the team commended Pohnpei for continuing to comply with the eligibility determination requirement. In future monitoring visits, NDOE will review a sample of Evaluation Reports and Eligibility Determinations for newly referred students. It is interesting to note that all 72 new referrals were found to be eligible as learning disabled students.

### **Data and Case Management**

The monitoring team reviewed 34 Individual Education Plans (IEPs) or student records to determine consistency of the implementation of the program's procedural manual and Student Information Tracking System (SITS) database. 17% (8/34) of the IEPs were selected from the SITS validation report showing that Annual Review and Re-

evaluation dates were overdue. Records were selected from schools that had IEP timeline issues in the monitoring from the previous year. In addition, 24 IEPs were selected from Sekere Elementary School, the targeted Response To Intervention (RTI) school for Pohnpei State school system, and the other 2 IEPs are from the homebound setting. All 34 IEPs were from the PICS High School, Sekere Elementary School, Seinwar Elementary School, Kolonia Elementary School, Ohmine Elementary School, Wenik ECE Center and Home service settings. See table below for breakdown by school.

Site	# Sample IEP	Total IEP	SpEd Tchrs.
PICS	2 (.02%)	95	5
Sekere	24 (100%)	24	1
Seinwar	2 (0.1%)	26	1
Kolonia	1 (.02%)	55	3
Ohmine	1 (.03%)	32	2
Wenik ECE	2 (100%)	2	0
Homebound	2 (15%)	13	3
Total	34	247	15

Based on review of the IEPs listed above, the team found the following issue on 15/34 (44%) of the IEPs:

1. IEP forms were not dated and signed by parents.
2. IEP forms were not checked off by parents to indicate they received and understand their rights and procedural safeguards, and
3. IEP forms were not checked or marked to show areas of concerns and suspected disability.

In addition, the team found 8/34 (24%) not meeting the Review and Re-Evaluation timeline. The monitoring team was presented with a list of reasons why these Reviews and Re-Evaluations were not completed on time. According to interviews with case managers and school teachers, for the Re-evaluation reviews, these IEPs were not

updated in a timely manner due to difficulty finding parents to obtain parental consent. Some of these IEP students live in remote areas where even telephone accessibility is not available. However, there was no evidence, as in telephone log sheets and case notes filed in student records to show that program staff tried to contact or locate parents to update IEPs. Staff report that these students live in remote areas of the island making it difficult to do home visits. Other IEP students with late review dates live on the outer islands of Pohnpei. All these concerns or issues were discussed as results of IEPs not being updated in a timely manner; however there was no evidence as in case notes and log sheets found in the IEP files to document these concerns.

IEPs were reviewed to ensure completion, validity and consistency of data between office records and the Student Information Tracking System (SITS database). It was found that 10 of these 34 student records were not consistent to SITS. A review of the program's biweekly case review meeting procedures confirmed to the team that case managers did what was required of them based on existing procedures. Case managers were conducting bi-weekly meetings to review and discuss IEPs and documenting meetings on meeting minutes. Since the last monitoring that was conducted in April of 2013, Pohnpei Special Education continue to provide to the program biweekly case review minutes for review, and when the program missed bi-weekly reviews, reports were submitted justifying why case review meetings were not conducted. Although case review meetings were conducted, there continued to be issues relating to case management of IEPs. This indicated to the monitoring team that case managers were not doing comprehensive reviews but were only focused on initial IEPs and IEPs up for annual review and re-evaluation. It became evident that if reviews during meetings were comprehensive, then IEPs would not have been incomplete, or the discrepancies between IEPs and the SITS would not exist.

Although the team found IEPs that were incomplete, there was no evidence showing that services were not provided to these students. The team verified that these students are in schools and receiving services, even when their IEPs are incomplete. Thus, the monitoring team recommends that Pohnpei State consider adopting and using NDOE's Child Record Review checklist and the SITS validation checklist to ensure completion of

IEP forms and validity and consistency of data. Also, Pohnpei Special Education program needs to train case managers of any revisions that will be added to the program's bi-weekly case review meeting procedures to ensure comprehensive reviews of records. More importantly, Pohnpei State must review all 34 incomplete IEPs and make sure they are updated and are consistent with SITS and submit to NDOE evidence that they are all corrected within 90 days.

Attached to this report is the Child Record Review Summary sheet as compared with the SITS validation checklist.

### **School Site and Homebound Visits**

The monitoring team conducted site visits at the schools listed on page 5 of this report and to 2 homes to verify consistency of student IEPs with placement and services delivered. The monitoring team reviewed IEPs and related documents and interviewed service providers and families during these school and home visits. The team reviewed the following: IEPs (noting services needed and schedule of such needed services), Related Service Assistant (RSA) service logs, and LEA monitoring reports.

The following stakeholders were interviewed during the school and home visits: School Principals, Resource Room teachers, Case Managers, Regular Education teachers, Early Childhood Special Education teachers, and the families.

In all the six (6) schools visited, the monitoring team found that the students were appropriately placed in learning environments (grade levels) and were being provided with appropriate services as listed in their respective IEPs.

However, at Sekere Elementary School, the team found 18 of 24 students with IEP (total IEP for Sekere school was 24) that were appropriately placed but not getting the appropriate services as listed in their IEPs since 3<sup>rd</sup> Quarter of this SY2013-2014. Services needed are listed in the IEPs based on evaluation reports and IEP team consensus but were not provided at all since beginning of 3<sup>rd</sup> Quarter. It became evident upon further interview with the RR teacher and classroom teachers of the grade levels in question that the RR teacher's time was spent preparing 8<sup>th</sup> grade IEP students for the PICS high school entrance test and other high stakes tests since the beginning of the 3<sup>rd</sup> quarter.

Notwithstanding the fact that the added assignment or intention of the RR teacher is benefitting the IEP students, the monitoring team finds this as non-compliance. This finding is based simply on the fact that the extra or specialized instructions needed by the 18 students with disabilities were not provided, not even from a substitute teacher. The monitoring team is cognizant of the fact that services such as specialized instructions for an IEP student to pass a high stakes test should not be considered as an appropriate special education service.

NDOE will be working closely with Pohnpei State to ensure closer monitoring of student placement and service delivery throughout SY2014-2015.

### **Special Education Parent Meeting**

There were a total of 12 parents that showed up for the parent meeting at the Pohnpei Special Education conference room. Discussions and sharing from the parents seem to indicate that they understand their parental rights and are aware of the special education services being provided to their children. Parents indicated that the program does provide them updates of services and activities the program provides to their children during IEP meetings, and that they are satisfied with the services the program is providing to their children.

Based on program administrators' input, they continue to ensure that RR teachers and Case Managers read and explain parents' rights during IEP meetings before obtaining consent for initial assessments or before placing and providing services. They further reported that they provide parents progress updates of their children's performance on IEP goals and objectives during IEP meetings and the quarterly Parent-Teacher Association (PTA) meetings.

Although parents reported being satisfied with the special education services provided to their children, 3 parents did complain about transportation services for their children. These parents complained that bus drivers never pick up their children. The LEA and the monitoring team provided general transportation and related services overview to parents and agreed to review these individual cases. After the meeting, the monitoring team reviewed the 3 IEPs and found that transportation service is not listed as "needed".

NDOE recommends that service providers ensure that transportation services are explained to parents during IEP meeting, Review, and Re-Evaluations. It should also be presented or discussed during PTA meetings or any other parent meetings. Although parents claimed to know of the complaint procedure and could have filed their complaints, they did not do so. Thus, the monitoring team and the LEA service providers encouraged the parents to make use of the complaint forms available at the schools and the main office to document any concerns they may have.

### **Meeting with Advisory Council (AC)**

The monitoring team met with the Advisory Council as scheduled with 4 of the 10 official members and one special education program staff. The active members of this group are representatives of parents of children with disabilities and individuals with disabilities, representative from Disabled People Organization, Community leader, Community representative, representative from LEA Department of Health, to include the program Coordinator.

Based on documents reviewed, the primary roles for this council are consistent with IDEA requirements and FSM Special Education requirements. It is documented and verified by meeting participants that their roles are to support the program in advising and make recommendations on procedures, practices, and policies implemented or proposed to support students with disabilities and parents. The council is responsible to also ensure that parents and other stakeholders are informed of programs and services and have opportunities to interact or comment on services and activities concerning their children.

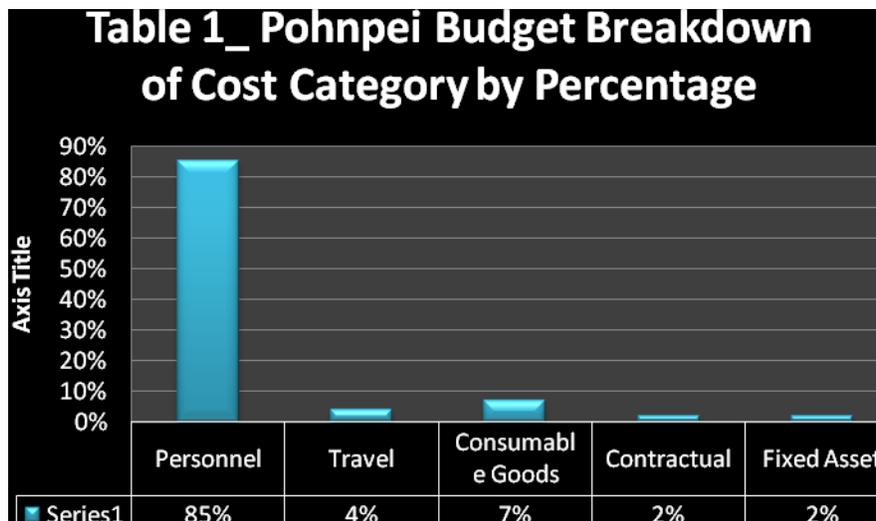
As a result of the meeting with the AC members present, these roles and activities were not fully implemented yet due primarily to inactivity of some members. A review of the minutes presented to the team indicated to the monitoring team that monthly meetings were not conducted on a consistent basis as reflected in the council's by-laws. According to this group's by-laws, this council is supposed to meet at the Pohnpei State Special Education office building, every first Thursday of each month. However, since the last monitoring visit to PDOE conducted in April 2014, only 2 copies of minutes out of the expected 13 were collected as evidence of meetings held. Members who were present

during the AC meeting admitted that meetings were not held consistently due to the absence of the Chairman, and that the group is in the process of reorganizing its officers and revising its By-Laws, including other reasons. The monitoring team do understand that although the council intents to revise its by-laws, they do have one that is active and governs their operations. Also according to the council's by laws, one of the duties of the Vice Chairman shall be to have powers to perform all the duties of the Chairman in the absence of the Chairman.

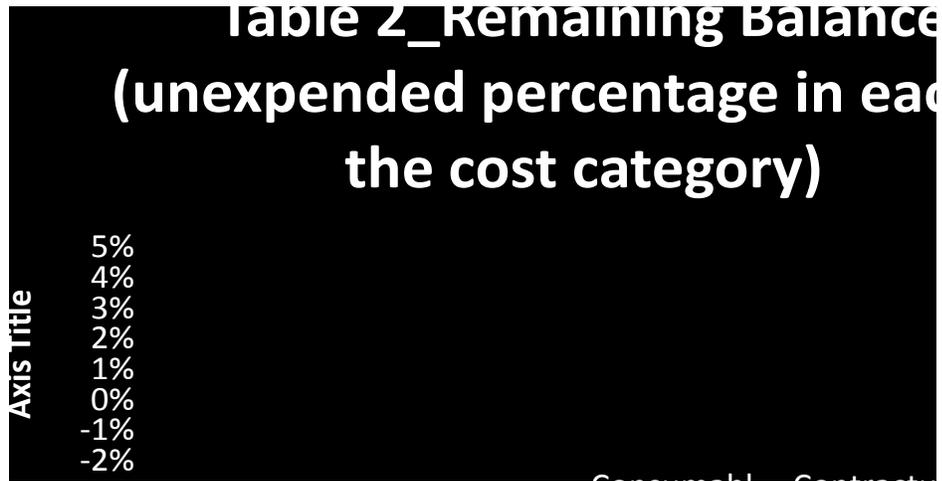
As this will be a finding of non compliance, Pohnpei State Special Education Program Advisory Council need to continue the actions and roles in the existing By-Laws as they complete its revision and reorganization of officers. LEA must complete and submit revised by laws, official reorganization of officers, and minutes of its first meeting to approve by laws and reorganization and other agenda items that may be entertained at such meeting.

**Fiscal Management**

Pohnpei Special Education Program applied for funding and was awarded \$1,079,624.00 in FY2013. Based on the approved state budget, the following graph shows a breakdown of cost category by percentage of the approved FY13 budget.



Based on review of expenditure reports as of the monitoring week, the program have expended about 97.21% of its FY2013 approved budget. The following graph shows the unexpended percentage in each of the cost category: 3% on Personnel, 1% on Travel, 3.8 % on Consumable Good, 0% on contractual (1.2% overspent) and 0% on Fixed Asset.



The team was satisfied to find that Pohnpei Special Education Program continues to improve in expending program funding.

Fiscal records were reviewed to determine compliance with IDEA, national and state fiscal management procedures. The samples selected and reviewed were of expenditures using FY13 funds in all five cost categories. A total of 37 fiscal records were selected: 10 Personnel, 10 Travel, 10 Other Consumable Expenses (OCE), and 2 Fixed Assets. There were no contractual documents reviewed as there was no documentation to show that there were any contract being made or executed. Discussed below are outcomes of review in each of the cost categories.

**Personnel**

The monitoring team found all 10 Personnel samples in order as salaries are consistent with Personnel Action Forms and that they are program employees actually assigned to schools and the Special Education central office. Reviewing Pohnpei Special Education FY13 approved budget, the program has 88 budgeted positions. As of this monitoring, 3 of the 88 positions were not filled. Child Find Coordinator, Related

Service Assistant (RSA), and Administrative Assistant positions are currently vacant. These 3 positions resigned with the FY 2013-14. Although these 3 positions were vacant, there were no issues found in relation to child find activities, IEPs under the supervision of RSAs, provision of special education services consistent with IEPs, and no fiscal issues. As a result of interview with the Coordinator of Pohnpei Special Education Program, Child Find Coordinator position will be removed from the FY 2014-2015 budget since the program does not find a need for this position. Case managers will assume the roles and duties of the Child Find Coordinator position. For the other 2 positions, according to the Coordinator of Pohnpei State Special Education Program, program will ensure these 2 positions are filled in the FY2014-2015 Budget. As these are the plans that Pohnpei Special Education program is considering, NDOE recommends that Pohnpei Special Education Program hires an RSA and resource teacher as the team sees needed to provide FAPE and special education services to all eligible children with disabilities in Pohnpei, particularly additional teacher at Sekere Elementary School. The monitoring team also recommends that position description for a case manager to be revised to include the roles and duties of a child find coordinator if the program will terminate the position. The monitoring team was able to review 10/85 existing Personnel Actions Forms (PAF) and found no significant discrepancies in all 10 PAFs reviewed.

### **Travel**

The monitoring team reviewed 10 Travel Authorizations (TA) provided for review, and found no indication of inappropriate use of program funds. Of the 10 TAs reviewed, all travelers are Special Education employees and purpose for travel were trips that are related to the special education program. Travel samples are also in order showing program personnel funded to attend or participate in meetings and conferences that are related to the program, with trails of documents verifying expenditures completed following procedures. Pertaining to the previous year's finding of non compliance on Travel, 3 of special education program staff will be funded by general education funding to attend the coming up MTEC in Kosrae in July of this year. The team commended the program for significant improvement in compliance in this area.

## **OCE**

The Monitoring Team found significant improvement in the Other Consumable Expenditure (OCE) area, however there is one issue on procedures that relates to collection of competitive price quotations. Out of the 10 OCE procurement samples reviewed, 5 were payments for repairing office vehicles. The monitoring team noted that there were no bidding documents from at least three vendors for selection to repair and/or maintain office vehicles in all five transactions. However, Pohnpei did provide evidence after the monitoring week showing evidence that a contractual agreement is in place between Pohnpei State Special Education and Ellen Repair shop that was signed and in effect since June 2008. The team did not make a finding in this case as Pohnpei State Special Education needs to have ready access to their vehicle repairs and Ellen's Repair shop have an understanding with the program that serviced vehicles can be release before payments are received. The monitoring team is aware of the current situation throughout the island where vendors do not accept late payments or will release vehicles only when payments are received.

The monitoring team, however, suggest that Pohnpei Special Education program re-new existing agreement with vendor to include specific languages on payment of services, listing of vehicle license plate number, authorized drivers/personnel to drop-off and pick vehicles. In addition, the program should extent same offer to other vendors and provide documentation that vendors received proposed arrangements but decline to accept such arrangements. NDOE will further require LEA to collect price quotes from all vendors that may agree to provide services to program with the same arrangement that payments can be received after repaired vehicles are released.

## **Fixed Assets**

Fixed Assets samples also showed price competition and allowable equipment to support grant activities at the local level. Pohnpei Special Education program purchased 3 new office vehicles following procurement procedures. The team was satisfied that Pohnpei State has significantly improved in implementing the program's fiscal management procedures in this area.

## **Commendations**

1. Special Education Program Coordinator and staff are to be commended for having timely corrected 5/5 previously identified findings of non compliances in April 2013, and for having only 2 findings of non compliance this SY 2013-2014.
2. Special Education Program Coordinator and staff are to be commended for the support shown to the Monitoring Team. Due to the staff's support, the team accomplished the objectives of the annual verification monitoring visit.
3. Special Education Program staffs are to be commended for active participation during meetings, school visits, and for their candidness during the monitoring visit.
4. Special Education Program mobility therapists for the homebound students visited are to be commended for providing the appropriate services. They are to be also commended for logging outcomes of the visits and services provided to the homebound students visited. Services provided were found to be consistent with student IEPs. The relationship observed between the mobility therapist and the children and their parents during the home visit was impressive.
5. ECE teachers at Wenik ECE Center and PICS High School resource teachers are to be commended for implementing special education services consistent with IEPs.

## **Recommendations**

1. Pohnpei Special Education Program should complete all 34 incomplete IEPs and submit to NDOE for review and verification within 90 days of this report.
2. Pohnpei Special Education Program Coordinator need to ensure that Case Managers visit schools on a monthly basis to observe implementation of services as well as work with the teachers and Principals to ensure all IEPs are updated.
3. Pohnpei Special Education Program also needs to ensure that case managers document outcomes of school visits and classroom observation in log sheets or report.
4. Pohnpei Special Education Program needs to ensure that case managers utilize log forms and document and report outcomes of school visits, classroom observation and meetings with principals and resource teachers and file them in student records.

5. Pohnpei Special Education Program needs to assist parents in becoming more aware of the complaint, transportation services, and parent survey forms to document parental concerns. Documentations of meetings or evidence that parents are provided with such information must be filed and copies submitted with reports due NDOE or when asked for.
6. Pohnpei Special Education Program need to strengthen its effort to document all concerns, requests, and issues parents present the program and respond to each concern with documentation.
7. Pohnpei Special Education Program needs to find strategies other than stipend to encourage parental involvement in meetings and other activities relating to parents of eligible children with disabilities.
8. Pohnpei Special Education Program needs to ensure that the position description for a case manager will be revised to include the roles and duties of a child find coordinator if the program terminates the position.
9. Pohnpei Special Education Program needs to ensure that bidding procedures are implemented accordingly.
10. Pohnpei Special Education Program needs to put meeting allowance for parents and AC under OCE.

### **Finding of Non Compliance**

1. **FAPE:** The monitoring team found that 18 of the 24 IEP students at Sekere Elementary School were not provided with Free Appropriate Public Education (FAPE) beginning 3<sup>rd</sup> quarter of the school year. Resource teacher was providing special education service only to the 8<sup>th</sup> graders beginning of 3<sup>rd</sup> quarter of this school year. Interviews with the resource teacher and regular education teachers indicated to the monitoring team that resource teacher was prepping 8<sup>th</sup> grade IEP students for PICS entrance examination, and other tests.

**Corrective Action:** Within 90 days, Pohnpei Special Education Program must ensure that case managers work with principals and resource teachers to ensure that FAPE at Sekere Elementary School is being provided consistent with IEPs for all eligible students with IEPs. Case manager for this school must work with the principal and resource teacher to ensure that all IEPs at this school will be

reflected in resource teacher's schedule. Case manager must also visit the school on a monthly basis and report results back to the Special Education Coordinator to ensure that special education services are provided to all IEP students at this school. NDOE will require 3 completed monthly Case Manager Reports of the school site visits to be submitted. NDOE will expect to receive the monthly reports for October, November and December 2014. The October report should include the SY2015 schedule for the Resource Room teacher.

- 2. Advisory Council:** The monitoring team found that although the AC's By Laws was still active, the AC is inactive. There was no evidence or documentation provided from this group to show that actions or what was required of the AC was implemented. The only documentations provided to the monitoring team were 2 minutes from meetings that were implemented after the last monitoring visit in April of 2014.. As required by this group's By-Laws, this group is supposed to meet on a monthly basis, and to discuss how they can advice the program in improving provision of FAPE and special education services to eligible children with disabilities in Pohnpei. Based on interviews with AC members present during the meeting, this group was inactive due to reorganization and revision of this group and its By Laws, and other reasons such as absence of other AC members during meetings.

Corrective Action: Within 60 days, PDOE must ensure that the AC is reorganized and its By-Laws are reviewed and revised as needed. Evidence of the reorganization and revision of By-Laws must be submitted for NDOE review. Pohnpei Special Education will then report in SY 2014-2015, evidence or outcomes of the actions required of this group, for example, copies of monthly meeting minutes in the programs quarterly progress reports.

## **Conclusion**

The monitoring team acknowledges Director Villazon and Coordinator Henry and staff for their continued efforts to improve services for children with disabilities in Pohnpei.

NDOE will continue to work closely with Pohnpei DOE and the Special Education program to ensure that corrections of the findings listed above are implemented in a timely manner. We will continue to support the state to ensure improvement in the areas general supervision of completion of IEP records, updates of IEPs and consistency and validity of data between office records and SITS database, FAPE and implementation of the roles and responsibilities of AC.

NDOE looks forward to working with the special education staff to correct the 3 new findings of non-compliance within the one year timeline and in a manner that will support improved services for children with disabilities and their families.