

Kosrae State Special Education Program Annual Verification Monitoring Report

January 15-19, 2018

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 2018, 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 Kosrae State did not focus on progress in correcting findings of noncompliance as there were none identified for Kosrae State for School Year 2016-2017.

The Monitoring Team conducted the on-site Kosrae State Special Education Annual Verification Monitoring from January 15-19, 2018. 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, and Jeffrey Figir, Fiscal Specialist for Yap Special Education Program.

This Monitoring Report presents outcomes based on meetings/interviews with parents, program staff, school principals and acting principals, the Interagency Agreement Council (IAC), general education teachers, special education teachers, observation of special education services within classrooms, homes and other settings where this program services children with disabilities, including outcomes of record review on IEPs, fiscal records, and other program records/documents. There is 1 finding of noncompliance identified for Kosrae Special Education Program during this monitoring and verification visit. This report details the monitoring and verification activities and outcomes including Commendations and Recommendations for Kosrae Special Education Program to use as reference or source to continue to improve on the services being implemented to children with disabilities in Kosrae.

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 Lugo Skilling, Acting Director of Education to present the team and an overview of the monitoring purposes and plan. Acting Director welcomed the monitoring team, and gave them permission and support to work with Kosrae Special Education program staff to accomplish the tasks and activities required of the on-site visit.

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 KDOE) Monitoring Checklist, meeting with special education general education teachers and resource room (RR) teachers within their classrooms, parents and Interagency Agreement Council members, and observation of implementation of services within the classrooms and resource rooms. The team appreciates the usual hospitality and warm welcome by Acting Coordinator Barnabus Palsis and the special education staff and their high regards of the team's intent and purposes to improve services for children with disabilities throughout the state school system, at homes, and other settings that the program service children with disabilities. An exit meeting was also conducted with the Director of Education to brief him on outcomes of monitoring and verification activities. A draft was provided to Acting Coordinator of Kosrae Special Education Program. The Agenda for the Monitoring activities is attached to this report.

Program Status

The Monitoring Team met with the Kosrae 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. The reviewing of documents was largely focused on how the program ensured planning and development of IEPs, implementation of special education services and fiscal management.

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. The team was also pleased to note that Kosrae Special Education program is conducted in a manner that ensures IEPs are developed according to students' evaluation results and that Free Appropriate Public Education (FAPE) were effectively delivered as required. However, there is one (1) finding of noncompliance in the area of fiscal management that pertains to unallowable use of IDEA funds. Kosrae Special Education program purchased items and distributed them as gifts during a Q & A activity in the 2016 Disability Day occasion. Per federal regulations or the OMB Super Circular guidance, costs of gifts items are considered unallowable expenses.

The total student enrollment of Kosrae public schools for this monitoring school year (SY) 2017-2018 is 2,013. Total IEP enrollment is 177, which is 8.7% of the student enrollment. For SY 16-17, the student enrollment was 2081 while the IEP is 192, which was 9% of the student enrollment. Compared to this SY2017-2018, there is a decrease of 0.3% in student enrollment. Although there is a slight decrease in student enrollment, Kosrae Special Education Program serve the student population above the 8% expected as normal within the KDOE education system beginning SY 2017-2018 to the dates of the on-site monitoring visit for Kosrae, January 15-19, 2018.

Individualized Education Plan (IEP)

The monitoring team met with the program key staff, Coordinator, Data Manager, Case Managers, Diagnostician, and high school Counselor for IEPs met to discuss how IEPs are developed. 18 IEPs were selected for review, and selection was based on annual reviews and re-evaluations that were 10+ days within review due dates, SY2016-2017 Early Childhood Outcome (ECO) who transitioned to 1st grade SY2017-2018, and the others are random selections. The discussions were focused on these following questions:

1. What are the resources used to develop IEP goals for eligible children with disabilities?
2. Are IEPs developed based on evaluation outcomes?
3. Are IEP goals results of students' present levels of performance (PLOP)?
4. Are IEP goals based on individual needs of students?
5. Are IEP goals descriptive, measureable and attainable?
6. Are IEPs developed accordingly to curriculum standards and benchmarks and modified to meet the needs of children with disabilities?
7. Are IEP goals developed based on student performance in quarterly progress report cards?
8. Are IEPs developed based on teachers and parental input?
9. Are special education and related services and supplementary aids consistent to IEP needs?
10. Are frequency, duration, and location of services sufficient and appropriate?

The team reviewed and discussed all 18 selected for review with program staff. Based on the documentations reviewed, it is evident that IEP present levels of performance (PLOPs) are results of assessment conducted. IEP goals are descriptive, measureable, and attainable and based on PLOPS or the individual needs of students. 5 of the 18 IEPs reviewed at Tafunsak Elementary Schools for example, the PLOPs were results of assessment and screening done by the Response to Intervention (RTI) program team at the school. However, the duration and frequency of 5 of the 18 IEP records reviewed, 1 at the 1st grade level, 1 in 7th grade, and 3 homebound showed that services continues to be planned out or developed by IEP teams in the same format as that of previous school years. This indicated to the monitoring team that Kosrae Special Education Program continues to service students with disability 45 minutes per school day and 2-3 times per week in Reading and Math at the ECE and Elementary level. As for students being serviced at the homes, the program continues to service students with disabilities 2-3 times a month for about an hour, 1 of the 3 reviewed 15-30 minutes per visit.

Although the monitoring team verified at the school and home sites observed that services were provided as identified on IEPs to 10 of the 18 students selected, 2 at KHS, 3 SES, 2 LES, and 3 homebound, the monitoring team is concerned about the sufficiency of the frequency and duration of services provided determined for 8 of the 18 students selected. LES for example, although the IEP stated that special education services will be provided to 1 of the 2 selected at this school within the general education setting 3 times a week, the RR at the school is servicing the student 5 times a week. The monitoring team is concerned that 2-3 times a week for 45 minutes per day, and about 1 hour twice or three times a month is not enough to ensure IEP goals are achieved, therefore recommends that IEP teams review the IEPs of these 5 students to determine if the current frequencies and durations of services can help these students attain IEP goals for this school year. The monitoring team also recommends that IEP teams explains in case notes or in writing how IEP teams determined the frequencies and durations of services to be provided to students with disabilities beginning this school year.

A total of 8 students were not observed. 5 students at Tafunsak Elementary School (TES) were not observed due to 2nd quarterly final examination on the week of the visit, 1 at KHS was on job shadowing during the visit, 1 at KHS due to scheduling of visit constraints, and 1 at SES was absent.

1 student selected at Utwe Elementary School (UES) was observed, however based on observation and interviews with regular education teacher and the Principal of the school, Resource Room (RR) teacher is not servicing the student in the regular education classroom. This student is amongst the 5 that the monitoring team is concerned about the current frequency and duration of services provided. This is the general supervision of FAPE finding of noncompliance that will be detailed under the Utwe Elementary School (UES) narration.

Data and Case Management

The monitoring team reviewed 18 student records to determine consistency of the implementation of program procedures, and validity of data. The monitoring team found all 18 records completed accurately and followed the FSM Handbook, procedural manual. Review of SITS database shows that annual and re-evaluation timelines are met. A validation report was printed to show that there was no overdue annual review and re-evaluation found on SITS. Also via review of IEP records, the team found all 18 reviewed not overdue yet as shown on Student Information System (SITS). All the 18 records reviewed were within annual reviews and re-evaluation. 4 of the 18 records reviewed were 1 to 4 days within annual and re-evaluation reviews during the week of the visit. The monitoring team verified at the schools visited, and found that these records were completed. On 01.19.17, the last day of the visit, data manager updated these records on SITS.

The monitoring team also reviewed 18 records to determine that eligibility determination date is completed within 60 days of receiving consent from the parents to conduct initial evaluation, and special education services provided within 30 days of parent consent for placement. All the 18 student records selected for review met both the 60 and 30 days timelines. The monitoring team commends Kosrae Special Education Program IEP teams, especially data manager, case managers and special education teachers for ensuring timely update of these 18 cases.

The monitoring picked 18 student records selected to compare consistency and validity of records between the SITS database and office records. As a result of review, the 18 records reviewed showed that data between SITS and office records pertaining to student names, school, and date of birth, grade, disability, service delivery, annual review and reevaluation are valid and the same. The monitoring team also commends Kosrae Special Education Program especially the program's data manager for ensuring that data between SITS and office records are reliable and valid.

School Site and Homebound Visits

The monitoring team conducted site visits at 5 schools, Kosrae High School, Sansrik Elementary School, Utwe Elementary School, Lelu Elementary School, Tafunsak Elementary School, and 3 home visits. For this year's monitoring, school visits are largely focused on determining if special education services are being implemented consistent with IEPs, and also to observe student performance during full inclusion sessions and to look at the resources that are being used in the classrooms to determine student performance within the regular education setting. The monitoring team followed a process where they first observe services being implemented both at the regular education, resource and home settings to determine student performance. Then both general education and special education teachers were interviewed. The team then meets with Principals or Acting Principals to discuss school profile, needs and challenges.

The monitoring team had dialogue sessions on case management and local level monitoring procedures with program staff before and after the school visits, and requested the program to provide evidence of case management monthly meetings and

school visits, and local level monitoring report, however were provided with case management documents that were conducted within SY2016-2017 to update IEPs on the last day of the monitoring visit. There is no evidence provided to show that case managers are visiting the schools to ensure RR teachers are providing special education services in the regular education classrooms since the beginning of SY 2017-2018. Also, there was no local level monitoring report provided to the team to show that the program is ensuring that services are being implemented in the classrooms and resource rooms. Per RR case manager's justification, as internal control, each school has an RR assigned verbally as site supervisor that special education services are provided in the classroom. Per interview with RR case manager, office and school telephones were utilized to get updates from site supervisors on status of delivery of special education services in the general education and resource rooms.

Although, there is no evidence provided to show how Kosrae Special Education Program is ensuring delivery of services in the classrooms and resource rooms, based on observation, interviews with school Principals and regular education teachers, at 4 of the 5 schools (KHS, SES, LES and LES) visited, RR teachers are delivering special education services to children with disabilities based on their individual schools. At the other school visited, UES, based on observation and interviews with school Principal and general education teacher, special education services is not provided to the 1 student the team selected to review and observe implementation of services. Therefore the monitoring team recommends that Kosrae Special Education Program utilize service delivery logs when implementing special education services in the classrooms and resource rooms.

Kosrae High School (KES)

The monitoring team is pleased to see the support special education program receives from the high school administration. The Principal is committed to supporting the needs of all students, including IEP students. The Principal shared that one of the high school's goals is to move the upper grades to the ground floor so that students with disabilities, especially the ones who cannot walk can have easy access to the classrooms. She also expressed her commitment to the full inclusion policy required of all schools. Kosrae High School has a total enrollment of 627 students. The Principal is expressed that the school is satisfied with the support, instructional materials and supplies provided to this school. Total active IEP at this school is 39, which is 6.2% of the total student population. There are 39 regular education teachers and 5 special education teachers.

The monitoring team selected 4 students; 1 in the 11th grade level, 1 in grade 12th, and 2 in grade 12^{th+} to review IEP completeness and to observe that special education services are being provided in the regular and special education classrooms. The 11th grader is fully included in the general education setting and taught in all subject areas on a daily basis, and receives supplementary aid from the resource teacher (RR) assigned to this student 4 times a week in reading and math within the same setting as stated in the IEP. The RR teacher supplements the aid by delivering the regular education teacher's lesson plans at levels that can help this student achieve the goals of the lessons given. Based on the math lesson of the day, the students slowly catch on compared to the other

peers. Per the general education teacher's interview, the RR teacher provides special education services as based on the IEP for this student.

The 12th grader was not observed. This student was on job shadowing during the visit. Based on regular education teacher's interview, this student is also fully included in the general education setting in all subject areas from Monday to Friday, and receives reading and math from RR teacher 45 minutes 4 times a week as identified in the IEP. 1 of the two 12th+ graders receives direct instruction in math and reading in the resource room setting 45 minutes per subject 5 times a week. The other class schedule periods were spent on this student's vocational skills. As observed, she can knead, and turn computers on and off, and the lesson observed was in math. The math lesson was on combining like terms. This student was able to get 2 out of 11 correct on the practice lesson. It is evident that this student still needs special education services.

The other 12th grader was not observed at the SMD classroom due to time constraint. The SMD center was moved within the KHS premises. Based on the SMD teacher interviews, this student also receives direct instruction in reading and math 45 minutes per subject, 4 times a day. Fridays are spent on building this student's vocational skills as identified on the IEP. As a result of record review, observation, and interview with regular education teachers and RR teachers, it is evident that 2 of the 4 students are receiving special education services based on their individual needs. The other 2 students not observed, record review and interviews with regular education and SMD teachers indicated to the monitoring team that these particular students might be also receiving special education services based on their individual needs. The monitoring team commends both the general education teacher and special education teacher for providing services as specified in the IEPs of the 2 students observed.

Sansrik Elementary School (SES)

The monitoring team is pleased to see the support special education program receives from this elementary school. An interview with the Principal of this school confirmed to the monitoring team that this elementary school is committed in supporting the needs of all students including IEP students. The Principal however expressed the need for school supplies and materials. Per 1 of the 3 RR teacher's interview, the request for school materials and supplies were done and given to case manager for the school since the beginning of the school year, and nothing has been provided. The visit per RR teachers' interview was the only visit conducted by the case manager for this school to collect school supply and material list since the beginning of the school year. The monitoring team recommends that the program ensures that this school receives the instructional materials and supplies requested since the beginning of this school year. Sansrik Elementary School has a total enrollment of 178 students. The total active IEP student at this school is 17, which represents 9.5% of the total student enrollment.

There are 16 regular education teachers and 3 special education teachers; 1/3 is an ECE Special Education teachers 2/3 are Resource Room (RR) teachers. The monitoring team selected 3 IEPs to review and observe delivery of special education services in both general and resource room (RR) settings. 1 of the 3 students is in the ECE grade level,

and the other 2 are in 1st grade. The ECE student was absent during the visit, therefore was not observed. Interviews with Principal, and RR teacher for ECE and the other 2 RRs at this school indicated to the monitoring team that special education services are provided to this student, however the team recommends Kosrae Special Education Program to further trained the new ECE special education teacher at Sansrik Elementary School since this teacher was just hired and placed at the school the week before the week of the monitoring visit. Based on interview with this ECE RR, she was oriented once on what is required of her as an ECE RR. The other 2 in 1st grade, although the RR was not present during the visit, based on classroom observation and interview with the general education teacher, both students are receiving services as stated in their IEPs in reading and math. Per the regular education teacher's interview, both students are fully included in the general education setting on a daily basis in all subject areas, and the RR teacher provides direct instruction in math and reading by modifying the regular education's lesson at the level appropriate to these 2 students needs 3 times a week 45 minutes per subject. The RR was not present because the instruction observed was science lesson.

The lesson observed during the visit was a science lesson where the regular education teacher had the students bring from home photos of sea creatures, and they identify what kind of sea creatures are they in vernacular. The monitoring team asked the regular education teacher to have the students sound out names of 3 to 4 letter words with student identify colors in vernacular, and it seems these 2 students catch on well like the other students. Based on report card provided, 1 of the students GPA for the 1st semester was 3.2. Interviews with both general education teacher and RR indicated to the team that the IEP for this particular student was carried over from ECE. The monitoring team recommends that IEP teams conduct re-evaluation for this particular child to see if this student still needs special education services. The other student's report card was not provided, however based on interview with the reg. education and RR teacher, this child is also performing like the other students, and the IEP used is also carried over from ECE. The monitoring team also recommends that IEP teams also conduct re-evaluation for this student. The monitoring team commends both the regular education and RR teachers for providing services to these 2 students.

Utwe Elementary School

Utwe Elementary School has a total enrollment of 212 students. The total active IEP student at this school is 14, which represents 7% of the total student enrollment. This school also expresses the need for school supplies and materials. Per interview with the Principal, he is not aware that he can request from the program school supplies and materials, and has been providing RR teachers the instructional materials and supplies requested from them. The monitoring team recommends that the program works with RR teachers to identify the instructional materials and supplies needed or based from IEPs and ensure that this school receives them.

There are 19 regular education teachers and 3 special education teachers; 1 is an ECE Special Education teacher, and the other 2 are Resource Room (RR) teachers. The monitoring team selected 1 IEP to review and observe delivery of special education

services in both general and resource room (RR) settings. As observed, the regular education teacher provides services to the student. Based on the IEP from this student, RR teacher is required to provide special education services in both reading and math 45 minutes 3 times a week. The monitoring team was not able to verify services provided by the RR teacher to this student. There is no service delivery log provided to verify implementation of services done by the RR teacher. Therefore the monitoring team recommends that Kosrae Special Education Program utilize service delivery log visits while servicing students with disabilities in the classroom.

Lelu Elementary School

Lelu Elementary School has a total enrollment of 303 students. The total active IEP student at this school is 23, which represents 8% of the total school enrollment. There are 33 regular education teachers including 5 special education teachers; 3 Early Childhood Education (ECE) teachers and 2 Resource Room (RR) teachers. The Principal of this school shared with the team the need to provide instructional and assessment materials and supplies requested to the school. Per the Principal's interview, they get requested materials from the program but very late. The monitoring team recommends that Kosrae Special Education Program ensures that this school receives requested instructional and assessment materials and supplies to this school before or at the beginning of each school year beginning next school year, and to provide the school the ones that the school requested for this school year as soon as possible.

The monitoring team selected 2 students to review and observe delivery of special education services. 1 of the 2 students is in the ECE grade level, and the other 1 in 7th grade. As a result of the visit to this school, the monitoring team is pleased to see witnessed the continuity of full inclusion within the elementary and ECE settings. The ECE student observed was found to be easily socializing and responding to lesson activities conducted by both regular education and special education teachers in manners consistent to their peers. The lesson activity observed was on writing numbers 1-10. The student slowly catching on to the other peers, however the monitoring team was impressed with the level of support from both teachers observed.

The 7th grader as observed was treated by the general education teacher just like the other students. It was difficult for the monitoring team to figure out which student is he because this student as the team observed raised his hand quicker than the other students to answer the teacher's questions, and responded to questions from the teacher as soon as the teacher asked. He was not shy, and seemed eager to learn. The team had to stop the teacher from his instruction just to identify which student he is. The lesson was a reading comprehension one, where the regular education teacher who is also the Principal of the school teaches the students how to use SQRRR to comprehend what the reading material is about. The reading material was on Population. SQRRR stands for Survey, Question, Read, Recite and Review. The lesson practice was given and the monitoring team can tell that the group the student observed was in slowly performed compared to the other peer groups. The RR teacher was not there during the observation attending to other reading classes. However, per the Principal's interview, the RR teacher provides special education services in reading and math 45 minutes per each subject 3 times a

week. The monitoring team commends the Principal and RR teacher for providing services to this student.

Although the Principal confirmed to the team through interview that the RR is providing service in the general education setting based on IEP, considering the current performance of the student compared to his peers, the monitoring team questions the frequency and duration of services determined by IEP teams, therefore recommends that IEP teams review this child's IEP again to determine whether the current frequency and duration of services provided is enough to assist the student achieve this school year's goals determined.

Tafunsak Elementary School

Tafunsak Elementary School has a total enrollment of students 343. The total active IEP student at this school is 37, which represents 10% of the total student enrollment. There are 26 regular education teachers and 5 special education teachers; 2 of the 5 are teachers are at ECE and the other 3, RR teachers. The monitoring team picked 5 students, 2 ECE, 1 in the 1st grade level, 1 in 5th and the other 1 in 6th. The principal of this school also expressed the need for school supplies and materials. Per his interview, they have requested textbooks for the Response to Intervention (RTI) or Project Lift program, however has not receive any. Other instructional materials requested had not been provided as well since the beginning of this school year. The monitoring team recommended that Kosrae Special Education Program provided this school the requested RTI and instructional materials and supplies as soon as possible. Also per the Principal's interview and the Local School Improvement Plan (LSIP) provided to the monitoring team, there hadn't been any activities conducted to determine student progress for the RTI project as of the last reporting period. Therefore, the monitoring team recommends that RTI team at this project school ensure activities are carried out in manners that will determine progress at the same time accomplish project goals. As confirmed by the RTI couch, the LSIP provided to the monitoring team was same one provided during the last APR conducted in Pohnpei late 2017.

The monitoring team was not able to verify implementation of services within the classrooms due to 2nd quarter final examinations being conducted during the week of the visit, however, per the principal's interview, RR and ECE special education teachers are servicing students as required of them and also based on IEPs.

Homebound Visit

The monitoring team reviewed 3 homebound students to observe special education services provided at their homes. Based on service log review, observation, and parent and guardian interviews, these 3 homebound students were found to be receiving special education services based on their IEPs, however as mentioned within the IEP narration, the team is concerned about the sufficiency of the frequency and duration of services provided. 1 of these 3 students receives range of motion (ROM) services 30-40 minutes 2 times a month, and this 20 years old student looked stiffer than when he was observed by the same monitoring team when he was 16 years old. The other 2 students, 1 receives ROM 30-40 minutes 3 times a month, and the other 1 receives the

same service 15-30 minutes 2 times a week. Due to the current physical status of 2 of the 3 students selected to be observed, the team is concern that the current frequency and duration of services is not enough these 2 homebound students including the other student selected, therefore recommends that IEP teams reviews the IEPs of these 3 students to determine if the frequency and duration of services is enough to attain their IEP goals for this school year.

Special Education Parent and Interagency Council (IAC) Meetings

The monitoring Team met with 11 parents from Kosrae Special Parent Network (KSPN). This group has been inactive since the previous year. Issues relating to this status include inactive leadership and lack of funding to carry out the activities required of this network. As recommended from the previous school year, KSPN needs to organize to attain the roles and duties required of them. As of this monitoring, this group has not re-organized; therefore the monitoring team recommends that Kosrae Special Education Program assist this group to re-organize.

Parent complaint forms, parent rights, parent awareness, participation and involvement are some of the matters of discussion of this meeting. Parents seem to know about this complaint form, are aware of special education activities that include parent participation, and parents are aware of their parents' rights. The 11 parents present during this meeting are satisfied with the provision and delivery of special education services to their children. However the team questions the other parents of the 177 students that the program is servicing this school year. During interviews with program staff and parents, the monitoring team found out that the program invites only parents from KSPN to attend the parents meeting as requested by the monitoring team, therefore recommends that Kosrae Special Education Program invites parents of all students with disabilities to attend the next parent meeting during on-site monitoring visit for Kosrae.

The IAC meeting was combined with the parent meeting. 2 members of the IAC attended this meeting, 1 from health services and the other, Workforce Skills Development and Training (WSD& T). The member from health services is the MCH Coordinator and Chairman of IAC. She expressed the need for collaboration between special education and health services program staffs in implementing their roles in identifying children with disabilities and ensuring that all children with disabilities within the age group 0-5 are serviced based on their individual needs. Therefore the monitoring team recommends that Kosrae Special Education Program ensures that their roles and responsibilities as required from the IAC are attained beginning this school year.

Fiscal Management

Kosrae Special Education Program applied for funding and was awarded \$536,053.00 for FY2017. 75.9% of the Kosrae Special Education Program 2017 Budget is for Personnel, 8.8% Travel, 8.9% Other Consumable Expenditures, 5.3% Contractual, and 1.0% fixed Asset. As of the monitoring dates, the Kosrae Special Education Program has expended about 96% of its 2017 approved Budget; Over Spent 1.0% in Personnel, 97.8% Travel, 96.5% Other Consumable Expenditures, 35% Contractual, and 28.5% Fixed Asset. The remaining percentage in each cost category is; Personnel -1.4%, Travel

2.2%, Other Consumable Expenditures 0.3%, Contractual 59% and Fixed Asset 71.5%. The monitoring team recommends that Kosrae Special Education Program ensures to spend remaining balances in all travel, OCE, contractual, and fixed asset shown not spend yet on the 2017 Budget by August 2018. However, due to the overspent in personnel, the monitoring team recommends that Kosrae Special Education Program close out all encumbrances in the cost categories beside the personnel, and request to reprogram the total encumbrance to personnel during the period of availability of funding to zero out FY17 account.

Fiscal records were reviewed to determine compliance with IDEA, national and state fiscal management procedures. The samples selected and reviewed were of expenditures using FY17 funds in all five cost categories. A total of 33 fiscal records were selected: 10 Personnel, 8 Travel, 8 Other Consumable Expenses (OCE), 2 Contractual, and 5 Fixed Assets. Discussed below are outcomes of review in each of the cost categories.

Personnel:

The monitoring team reviewed Kosrae Special Education Program's (KSPED) 2017 Budget and the personal listing to determine that there are employees assigned to the schools and the Special Education central office. As a result of review, the monitoring team found that 3 of the 46 budgeted positions are vacant, 1 administration position, and 2 teaching ECE positions. Interviews with the program staff indicated to the monitoring team that these three vacant positions are in the hiring process and they are about to be completed. The monitoring team traced and confirmed that these 3 vacancies followed hiring procedures and are about to be filled. The monitoring team also reviewed these 10 PAs to determine that the hiring process is followed. As a result of review, the team found that all 10 PAs followed hiring procedures, job announcements, applications, and screening results from the selection process attached. However, 1 of the 43 position titles reviewed in the 2016-2017 Budget does not match what is in the personnel action. In the personnel action, the position title is data manager and on the 16-17 Budget, it is identified as data assistance. The monitoring team recommends that Kosrae Special Education Program modify its 2016-2017 Budget to reflect what is in the personal action.

Travel:

The monitoring team reviewed 10 Travel Authorizations (TA), and found that 1 of the 10 processed did follow prior approval procedures and other TA requirements (itinerary, invitation and agenda), however bidding requirements for an international travel to Dallas, Texas was not filed. The monitoring team was not able to verify that 3 quotations for airfare were conducted beyond Hawaii to Mainland and back due to lack of documentations provided to the team. However the team verified that there is prior approval by OSEP. With prior approval in place, it is indications to the monitoring team that bidding requirements were conducted, however not filed properly. Thus, the monitoring team recommends that Kosrae Special Education Program ensure filing of fiscal procedures pertaining to bidding or collection of airline quotations for Travel for all future travels beyond Hawaii.

OCE:

The Monitoring Team reviewed 6 samples in the OCE cost category, and found all 6 followed procurement procedures accordingly. 3 of the 6 POs are for Kosrae Telecom and the other 3 POs are basically for office supplies. All required documents are in place with all 6 samples.

Fixed Assets:

The monitoring team reviewed 5 samples of Fixed Assets, and found that these 5 POs followed all procurement and bidding procedures. 1 of the POs was on procuring of one split type air-con in the amount of \$1,499.00; the other 2 POs are for procurement of program vehicles in the total amount of \$9,300.00. The remaining 2 POs are for program laptops in the amount of \$2,349.00. As a result of review, these 5 fixed assets procured followed IDEA part B requirements, bids were attached, and the lowest bids were selected. However, there was no maintenance log in place for the 4 existing vehicles for the program. The monitoring team recommends that Kosrae Special Education Program ensure there is a maintenance log for program vehicles.

Contractual Services:

The monitoring team reviewed 2 of the Kosrae Special Education Program contracts, both of which were for the Kosrae Disability Day conducted every year. Kosrae SpEd do have the line item in their 2017 Contractual budget and followed the bidding process. Documentations collected and reviewed verified that the procurement process was followed and all documents were available for review. However, one of the contracts was an open purchase order (Purchase Order No.L91602) in the amount of \$4,000 where different services and items from different vendors were charged against. Request payments charged to this PO were allowable except for Invoice 37422 in the amount of \$399.59. These items were distributed during the event of the Disability Day as prizes to the general audience. Because the items purchased were not provided directly to the students with disabilities or their parents in support of their IEP needs, the amount of \$399.59 is an unallowable cost. IDEA funds are not allowed to be used for purchase of gifts and prizes to anyone.

As corrective action, Kosrae Special Education Program needs to provide NDOE assurance or documents that the State Department of Education will be charged the full amount of \$399.59 and that the Special Education program will not expect reimbursement of the said amount. If Kosrae SpEd can't resolve this with KDOE, this amount will be withheld at NDOE in the next advice allotment. Furthermore, should this be repeated in the future, NDOE will require recovery of funds from sources other than the Kosrae IDEA sub grant.

It was also found that Kosrae Special Education Program did not use up the total amount obligated to be used for the Disability Day occasion. A total of \$20.41 was not used; therefore the monitoring team recommends that Kosrae Special Education Program ensure to de-obligate this remaining amount to special education account.

Commendations

1. Special Education Program Acting 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 on-site verification-monitoring visit.
2. Special Education Program staffs are to be commended for active participation during meetings, school visits, and for their candidness during the monitoring visit.
3. The monitoring team commends Kosrae Special Education Program IEP teams, especially data manager, case managers and special education teachers for ensuring timely update of 18 student records selected on 30 and 60 days timeline.
4. Kosrae Special Education Program specifically the program's data manager, and RR teachers for ensuring timely update of annual and re-evaluation reviews.
5. The monitoring team commends Kosrae Special Education Program especially the program's data manager for ensuring that data between SITS and office records are reliable and valid.
6. General and Special Education teachers for ECE at Lelu Elementary School are to be commended for their commitment and teamwork in providing special education services to the IEP student selected and for actively involving the student lesson activities observed in the regular classroom settings.
7. The Principal and RR teacher at Lelu Elementary School are to be commended for their commitment and teamwork in providing special education services to student selected and for actively involving the student in lesson activities observed in the regular classroom settings.
8. The general education and RR teachers at Sansrik Elementary School are to be commended for their commitment and teamwork in providing special education services to the 2 student selected and for actively involving the students in lesson activities observed in the regular classroom setting.
9. The general education and RR teachers at Kosrae High School are to be commended for their commitment and teamwork in providing special education services to 2 of the 4 students selected and for actively involving the students in lesson activities observed in the regular classroom and resource room settings.
10. Fiscal officer is to be commended for keeping current fiscal records filed in an organized manner.

Recommendations:

1. The monitoring team recommends that Kosrae Special Education Program utilize service delivery log visits while servicing students with disabilities in the classrooms.
2. Interviews with Principal, and RR teacher for ECE and the other 2 RRs at SES indicated to the monitoring team that special education services are provided to the ECE selected, however the team recommends Kosrae Special Education Program to further trained the new ECE special education teacher at Sansrik Elementary School since this teacher was just hired and placed at the school the week before the week of the monitoring visit. Based on interview with this ECE RR, she was oriented once on what is required of her as an ECE special education teacher.
3. Per 1 of the student's semester grade point average (gpa) or current student performance, and interviews with regular and RR teacher at SES, Kosrae Special Education Program needs to conduct re-evaluation for the 2 1st graders selected at the school to determine if they still need special education services.
4. Per the Principal's interview at TES and the Local School Improvement Plan (LSIP) provided to the monitoring team, there hadn't been any activities conducted to determine student progress for the RTI project as of the last reporting period. Therefore, the monitoring team recommends that RTI team at this project school ensure activities are carried out in manners that will determine progress at the same time accomplish project goals.
5. Per the regular education's interview at UES on the selected for review 1st grade student's current performance, the monitoring team is concerned about the frequency and duration of services determined for this child, therefore recommends that IEP team for this student reviewed this student's IEP to determine if the current frequency and duration of services is enough to help this child attain IEP goals for this school year.
6. Although the Principal at LES confirmed to the team through interview that the RR is providing service in the general education setting based on IEP, considering the current performance of the 7th grade student compared to his peers, the monitoring team questions the frequency and duration of services determined by IEP teams, therefore recommends that IEP teams review this child's IEP again to determine whether the current frequency and duration of services provided is enough to assist the student achieve this school year's goals determined.
7. Due to the current physical status of 2 of the 3 homebound students selected to be observed, the team is concern that the current frequency and duration of services is not enough for these 2 homebound students including the other homebound student, therefore recommends that IEP teams reviews the IEPs of these 3 students to determine if the frequency and duration of services are enough to attain their IEP goals for this school year.

8. As of this monitoring, the KSPN has not been re-organized; therefore the monitoring team recommends that Kosrae Special Education Program assist this group to re-organize.
9. During interviews with program staff and parents, the monitoring team found out that Kosrae Special Education Program invites only parents from KSPN to attend the parents meeting as requested by the monitoring team, therefore recommends that Kosrae Special Education Program invites parents of all students with disabilities to attend the next parent meeting during on-site monitoring visit for the Kosrae.
10. The monitoring team recommends that Kosrae Special Education Program ensures that their roles and responsibilities as required from the IAC are to be attained beginning this school year.
11. The monitoring team recommends that Kosrae Special Education Program ensures that LES, TES, SES and UES receives requested instructional and assessment materials and supplies before or at the beginning of each school year beginning next school year, and to provide these school the ones that were already requested for this school year as soon as possible.
12. The monitoring team recommends that Kosrae Special Education Program ensured there is a maintenance log for the 4 existing program vehicles, and all vehicles that the program will purchase in the future.
13. The monitoring team recommends that Kosrae Special Education Program ensure filing of fiscal procedures pertaining to bidding or collection of airline quotations for Travel for all future travels beyond Hawaii.
14. 1 of the 43 position titles reviewed in the 2016-2017 Budget does not match what is in the personnel action. In the personnel action, the position title is data manager and on the 16-17 Budget, it is identified as data assistance. The monitoring team recommends that Kosrae Special Education Program modify its 2016-2017 Budget to match Position Title with existing Employment Contract Title (*Data Assistant to Data Manager*).
15. The monitoring team recommends that Kosrae Special Education Program ensures to spend remaining balances in all travel, OCE, contractual, and fixed asset shown not spend yet on the 2017 Budget by August 2018. However, due to the overspent in personnel, the monitoring team recommends that Kosrae Special Education Program close out all encumbrances in the cost categories beside the personnel, and request to reprogram the total encumbrance to personnel during the period of availability of funding to zero out FY17 account.

16. It was also found that Kosrae Special Education Program did not use up the total amount obligated to be used for the DD occasion. A total of \$20.41 was not used, therefore the monitoring team recommends that Kosrae Special Education Program ensure to de-obligate this remaining amount to special education account.

Finding of Noncompliance

K18.01-Fiscal Management-Non-Allowable Cost- *The monitoring team reviewed 2 of the Kosrae Special Education Program contracts, both of which were for the Kosrae Disability Day conducted every year. Kosrae SpEd do have the line item in their 2017 Contractual budget and followed the bidding process. Documentations collected and reviewed verified that the procurement process was followed and all documents were available for review. However, one of the contracts was an open purchase order (Purchase Order No.L91602) in the amount of \$4,000 where different services and items from different vendors were charged against. Request payments charged to this PO were allowable except for Invoice 37422 in the amount of \$399.59. These items were distributed during the event of the Disability Day as prizes to the general audience. Because the items purchased were not provided directly to the students with disabilities or their parents in support of their IEP needs, the amount of \$399.59 is an unallowable cost. IDEA funds are not allowed to be used for purchase of gifts and prizes to anyone.*

Corrective Action- *Within 30 days, to correct this finding of noncompliance within the one year, Kosrae Special Education Program needs to provide NDOE assurance or documents that the State Department of Education will be charged the full amount of \$399.59 and that the Special Education program will not expect reimbursement of the said amount. If Kosrae SpEd can't resolve this with KDOE, this amount will be withheld at NDOE in the next advice allotment. Furthermore, should this be repeated in the future, NDOE will require recovery of funds from sources other than the Kosrae IDEA sub grant.*

Conclusion

The monitoring team acknowledges and commends Dr. Tulensru Waguk and Acting Coordinator Barnabus Palsis and Kosrae Special Education staff for their continued efforts to improve services for children with disabilities in Kosrae. NDOE will continue to work closely with Kosrae DOE and the Special Education program to ensure continuity of improvement of services to all children with disabilities in Kosrae and to obtain the corrective actions required of the 1 newly identified finding of noncompliance for Kosrae Special Education Program.