

Management audit and functional analysis report Kosrae State Department of Education

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- 1 Table of ALL Performance indicators
- 2 List of DOE persons interviewed
- 3 List of documents sourced
- 4 Sample Contracts
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During the course of the audit in Kosrae, over 100 employees of the Kosrae State Department of Education gave freely of their time to meet with the audit inspector and meaningfully discuss the critical impacts regarding the delivery of educational services to that State's community. Many employees availed themselves on numerous occasions to participate in follow up discussions. Since there are too many to name individually in this section of the report, please accept the sincerest of thanks for your time and efforts. (*A list of persons interviewed appears in the attachment section of this report*).

Enormous gratitude is extended to Director Paul Hadik of the Kosrae State Department of Education. Without his support and assistance, the task of undertaking this audit would have been significantly more challenging.

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Tim Fenlon

A BBREVIATIONS

AA/AS	Associate Arts / Associate Science Degree
BA/BS	Bachelor of Arts / Bachelor of Science Degree
B.Ed	Bachelor of Education Degree
CIMS	Continuous Improvement Monitoring System
COMET	College of Micronesia Entrance Test
DOE	Department of Education
ECE	Early Childhood Education
FACSSO	FSM Association of Chief State School Officers
FMR	Financial Management Regulations (Kosrae State)
FSM	Federated States of Micronesia
HESA	Department of Health, Education and Social Affairs
JEMCO	Joint Economic Management Committee
KAT	Kosrae Assessment Testing (Program)
KLPT	Kosrae Language Proficiency Test
K-Tec	Kosrae Teacher Education Conference
MA/MS	Master of Arts / Master of Science Degree
NBC	New Baseline Curriculum
NDOE	National Department of Education
PIRC	Parental Information Resource Center
PREL	Pacific Resources for Education and Learning
PRIDE	Pacific Regional Initiatives for the Delivery of basic Education
PTC	Parents and Teacher Conferences
PTA	Parent and Teacher Associations
SAT	Stanford Achievement Test
SCL	State Code of Laws (Kosrae State Code of Laws)
SIP	School Improvement Plans
SPED	Special Education
T3	Technical and Vocational Education and Training
TNA	Training Needs Analysis
TOEFL	Testing of English as a Foreign Language

EXECUTIVE SUMMARY

Within the education sector in Federated States of Micronesia (FSM), the Kosrae Department of Education (DOE) is the smallest of all state educational organizations. Its annual budget is about \$4.1 Million. The department employs 259 people (about 190 are teachers), and consists of six (6) Elementary Schools and one (1) High School catering to the educational needs of just under 2,200 students from Early Childhood Educational (ECE) level to Grade 12. Within a Kosrae State context, it is the single largest department.

Complexity of administration and management functions of the department are highlighted through factors such as all personnel issues being the responsibility of an external department (Personnel Division within Department of Administration), and that funding is derived from two (2) separate sources (Sector funding and Supplemental Education Grants – each with their own specific requirements and guidelines).

The Kosrae DOE is an organization which can be appropriately described as currently undergoing a significant change management process. Organizational changes include:

- an emphasis in moving from a ‘centralized’ management structure to a localized ‘school based’ structure;
- changes in employment conditions from a Public Service System regulated regime to one of individual work contracts;
- enhancement of professional standards and codes of conduct (through the Professional Standards initiative);
- embracing a strategic focus in administrative and service delivery components within the organization;
- organizational wide teacher qualification and certification;
- exploring alternative assessment formats in order to identify improvements in current teaching / learning approaches;
- building of new facilities (a new High School and 2 new Elementary Schools – Utwe and Lelu);
- improved resourcing of facilities to enhance the learning environment for students; and
- the introduction of an independent Advisory Board to monitor educational programs and operations.

Change management eras within any organization can be periods of instability and place significant stress on operations and personnel. However, the audit found, that even during this period of change, high levels of commitment towards creating a more effective organization supported through great enthusiasm appear to be imbedded within all levels of the department. Under the current Director, the Kosrae DOE demonstrates vision and genuine drive to improving the educational standards and opportunities of Kosrae’s youth.

The department was found to be in compliance with 53 of the 105 (50%) performance criteria established in order to conduct this management review. While acknowledging throughout the report areas where the Kosrae DOE has been fulfilling its role well, the

audit has found that improvements in some management and operational systems will result in areas where the department, which is now in partial compliance (33 criteria), achieving greater compliance and thereby positioning it as an effective educational institution.

The auditor was encouraged by the strength of the department's strategic planning efforts. However the momentum generated at that higher (strategic) level is lost through less than effective local Annual plans.

In a number of areas, the department can be proud of its efforts, for example, addressing the special educational needs of students requiring assistance; supporting talented and gifted students through uniquely designed programs; the innovative vocational program and the commitment to improve the professional standards of teachers and streamlining the disciplinary process. On this last point however, the levels of student discipline (particularly regarding attendance at school and in the consumption of (school) banned substances such as betel nut) came under widespread criticism.

The twenty-seven (27) recommendations which are summarized on Pages 9 to 12 of this report represent the key findings of the audit. Priority attention is required in some specific areas. A number of Human Resource issues need to be addressed so that levels of services provided by teachers and other DOE staff can improve. The audit found position descriptions (PDs) did not adequately describe the job required of employees. PDs were neither current nor reflective of the tasks required to be performed. Proper guidance can not be offered to staff where they do not fully appreciate the breath of their job. Additionally, performance evaluation is inhibited through not being able to evaluate actual performance against stated job criteria.

During this management review, the auditor found that testing data could be used in a more effective manner. While the Director conducts his own detailed review of testing scores and results, any deep analysis of that data is not really undertaken by teaching practitioners. The KAT, NDS and other types of testing form the basis to guide improvements in teaching and learning. While it is generally understood by teachers that the testing scores have the potential to highlight strengths and weaknesses in learning by students, there does not seem to be any meaningful attempt to apply the potential opportunities possessed within that data.

There are two (2) critical issues identified by the audit as needing priority attention by the Kosrae DOE. Firstly, there is no dedicated policy or procedural manual dealing with the range of administrative and operational systems / processes. The department does have a clearly articulated Professional Standards Manual which documents the organizational position and the requirements of employees regarding codes of conduct, professional standards and the disciplinary process. The department would benefit from a similar type manual which addresses the vast array of functions performed and systems established throughout the organization. Such a manual would clearly outline the organization's position on issues and the manner it (the department) expects those issues to be implemented. A central policy and procedures manual supports consistency in service delivery, openness and accountability.

Finally, the most common issue raised by staff (particularly teachers) was the need for a structured, regular and on-going staff development program, namely in the form of in-service training. Kosrae DOE personnel would benefit from such a program. Delivery of educational services is a dynamic profession, and the primary means of improving staff skills and knowledge AND allowing teachers to remain 'relevant' in such an environment requires a dedicated staff development program.

SUMMARY OF RECOMMENDATIONS

The following recommendations are made as a result of the management audit conducted in Kosrae State. In brackets after the recommendation appears the page number reference for that specific recommendation. The justification for the recommendation will appear in the relevant section within the body of this report.

It should also be noted that in the management audit conducted in Yap State in December 2008, a number of recommendations were made. This report, in most instances supports those recommendations as also being applicable for Kosrae State. For ease of reading, recommendations identical or similar to those made in the Yap management audit report and which are supported for consideration in Kosrae, may on occasions be integrated into this report (however the reference page of the Yap report is highlighted).

Strategic Management

Recommendation One:

It is recommended that key educational personnel review the 20 indicators and identify alternative, meaningful and useful measures of educational progress **(P19)**

Recommendation Two:

It is recommended that the Kosrae DOE Director, convene a working group of specialist teachers to review and analyse NST and Kosrae State assessment data and develop strategies for addressing areas of weakness or concern. **(P20)**

Recommendation Three:

It is recommended that the Kosrae DOE revisit the strategies identified out of the PRIDE Workshop and reconsider approaches with the view to implementation of those strategies. **(P21)**

Recommendation Four:

It is recommended that a more thorough orientation is developed for future World Teach volunteers, such orientation to incorporate presentations from all key and relevant Kosrae DOE specialists so as to assist volunteers in preparing and delivering educational services in accordance with DOE strategic direction. **(P21)**

Recommendation Five:

It is recommended that a more structured forum exist whereby collaboration and the sharing of information and expertise between (World Teach or Peace Corp) volunteers and local teachers is achieved. **(P21)**

Recommendation Six:

It is recommended that the State Attorney General consider inclusion of roles and responsibilities within future Contracts of Service for persons fulfilling that position and also to explore legislative amendments which clarify and detail the functions to be performed. **(P25)**

Recommendation Seven:

It is recommended that that vocational a structured and regular in service training program is developed and implemented for teachers. **(P27)**

Recommendation Eight:

It is recommended that Kosrae Government consider amending the status of the Director on the Board and that private schools be approached by the Chairperson of the Board to nominate a representative as a matter of priority **(P32)**

Recommendation Nine:

It is recommended that a separate assessment program (in addition to the examinations conducted by Division of Personnel) is conducted with applicants for teaching positions with the view of properly identifying the most suitable candidate for selection. **(P35)**

Recommendation Ten:

It is recommended that the DOE draft policies guiding openness and accountability in all transfers and promotions. (In fact, a complete manual of policies and procedures across all DOE administrative and operational activities is required). **(P37)**

Recommendation Eleven:

It is recommended that the DOE develop an action plan to incorporate a change management process of moving from a centrally to a locally based management structure. **(P50)**.

Recommendation Twelve:

It is recommended that all functional areas (including schools) need to develop ANNUAL SIPs and that such plans are developed inline with contemporary Annual Action Plan processes. These plans need to have built in evaluation and reporting components. **(P54)**

Recommendation Thirteen:

It is recommended that a review is undertaken of data recording systems, not only relating to ECE, but across the entire department. **(P57)**

Pedagogy

Recommendation Fourteen:

It is recommended that the Kosrae DOE, as a matter of priority, conduct a TNA of teacher training needs and develop and implement a structured in service training program for teachers. (P65)

Recommendation Fifteen:

It is recommended that the National Department of Education take a lead role in identifying the minimum national standards of in service training necessary to be provided to teachers throughout the FSM. (P65)

Recommendation Sixteen:

It is recommended that teaching practitioners and curriculum designers are provided the skills (through training) to be able to conduct detailed analysis and problem solving of testing results. (P67)

Administration

Recommendation Seventeen:

It is recommended that the State Education Advisory Board include a representative of the Private School as a matter of priority. (P74)

Recommendation Eighteen:

It is recommended that a formalized structure of meetings, oversight and reporting is established between the DOE and the Private Schools. (P74)

Recommendation Nineteen:

It is recommended that the selection and hiring of special instructors is guided by the development of policy and procedures. (Also refers to the development of policy and procedures manual for a range of operational and administrative matters across the entire Department) (P76).

Recommendation Twenty:

It is recommended that as a matter of general course, regular budget advice briefings are provided to the Director. It is recommended that documented policy and procedures – designed to compliment and reinforce FMR provisions – are developed by the DOE. (P77)

Recommendation Twenty-one:

It is recommended that a systematic budgetary reporting regime is instituted so as to regularly inform the Director on financial status of the Department. (P77).

Recommendation Twenty-two:

It is recommended that all Position Descriptions are reviewed for accuracy and relevance to current duties performed. **(P82)**

Recommendation Twenty- three:

It is recommended that a job analysis is conducted by a HR specialist to identify and define all various (individual) positions within the DOE and prepare detailed (job specific) job / position descriptions. **(P84)**

Recommendation Twenty-four:

It is recommended that a HR specialist also review the adequacy of performance evaluation forms with the view of determining the efficacy of such forms in truly monitoring and evaluation performance. **(P86)**.

Recommendation Twenty-five:

It is recommended that all teachers and employee contracts should be amended to specifically draw the employee/contractors attention to the range of penalty sanctions outlined in the Professional Standards Manual. **(P88)**

Recommendation Twenty-six:

It is recommended that DOE develop and adopt organizational policies and procedures which will also guide the development of localised school based policy manuals. **(P91)**

Recommendation Twenty-seven:

It is recommended that issues identified in relation to assignment, transfer and leave of employees needs to be supported with documented policy and procedures. **(P92)**

INTRODUCTION

Background

This report represents the findings of a management audit and functional analysis conducted in the State of Kosrae for the Kosrae Department of Education (DOE) between November 2009 and March 2010.

The Kosrae DOE management audit is the second of a number of similar audits to be undertaken throughout the Federated States of Micronesia (FSM). These audits have been commissioned by the Department of Education, FSM National Government in accordance with the provisions outlined under Education Sector Grants and Joint Economic Management Committee (JEMCO) Resolution 2009-9.

Yap DOE was the first jurisdiction to be audited in 2008 with a Management Audit Report being submitted in December of that year.

Scope of audit.

A Contract of Services was developed to identify the terms of reference of the audit. In accordance with the provisions of that Contract, it was sought that a thorough review and analysis of the Kosrae State DOE personnel structure, policies, and the way in which personnel are hired within the department was to be conducted. The end result of the audit includes the submission of a report containing recommendations for consideration.

General Scope of work

The general scope of work included:

- reviewing Kosrae State DOE personnel structures, policies and personnel hiring processes;
- addressing DOE's compliance with internal and external performance standards, laws and policies, with an emphasis on personnel management policies;
- ensuring best practices are implemented;
- evaluating the effectiveness of management practices and where necessary produce a personnel re-structuring plan for the department.

Objectives

A primary and a number of secondary objectives were developed in order to achieve the stated aim of the audit. These include:

Primary

Review and analyse Kosrae DOE structure and systems to determine the extent to which the department is in compliance with internal and external laws and policies, including its performance in personnel structure, policies, and hiring practices of education personnel, and the effectiveness and efficiency of operations, controls, service plans and individual performance targets as well as statutory and legal liabilities, in the provision of effective support to schools and other academic institutions so as to promote improved student learning.

Secondary

- a. Conduct thorough reviews and analysis of Kosrae DOE's personnel structure, policies and the state's hiring practices of education personnel,
- b. Identify deficiencies and anomalies within the said department's system,
- c. Make recommendations for possible remedial measures, policy changes and personnel re-structuring based on good practices, research findings and principles and
- d. Produce a personnel re-structuring plan for Kosrae DOE to implement.

Methodology

The evaluation design adopted for this task reflects a qualitative approach, incorporating consultation with jurisdictional representatives across each of the key activity areas / phases, and content analyses of relevant documents. In order to maximise the outcomes from the consultation process, both group and individual sessions were conducted, the first designed to contextualise issues; while the latter was designed to drill down into specific areas of interest.

Three distinct phases were used:

Phase 1. Establishing criteria

This phase involved the identification of relevant internal and external performance evaluation criteria from source materials including mission and vision statements, plans, goals, objectives, targets, service standards and statutory requirements and provisions.

Phase 2. Collection, analysis and evaluation of performance data and evidence

This phase involved the collection, analysis and evaluation of performance data and evidence for each of the criteria identified in Phase 1. Analysis and evaluation was conducted against data-based indicators and means of verification, with triangulation from a variety of sources. Activities included:

- interviews with management and staff,
- focus group meetings with principals and teachers,
- interviews and focus group discussions with stakeholders including parents, employers and community members,
- review of documentary evidence including strategic plans, monitoring and evaluation reports and service delivery data,
- identification and analysis of trends and patterns in data.

Phase 3. Reporting

This phase involved the development by the auditor of a report to the client detailing the findings of the audit, including recommendations and relevant restructuring plans.

Overall, the multi-faceted evaluation method adopted is recognized within the social science discipline as a technique to reduce subjectivity typically associated with second-order interpretations of interview data, content analyses and observational studies. Notes from each interview and/or workshop undertaken as part of the evaluation have been maintained and are available for transparency and accountability purposes. In addition, a consultation schedule is provided as part of this report for reference.

Content analyses were undertaken of all relevant documents. These analyses assessed the quality of information contained within the documents; its relevance and currency to the respective operating environments; and its utility for the intended audiences. As part of this process, various agency documents including strategic plans and organizational orders and procedures (where available) were also obtained to contextualise their relevance.

The audit process adopted for the Kosrae DOE mirrors the approach undertaken with the Yap DOE audit in 2008. The primary reasons include:

- Adopting (and replicating) an audit framework which had been demonstrated as effective;
- Providing methodological consistency across all State and National agencies;
- Creating an opportunity (at a later time) to compare findings between all jurisdictions reviewed.

Naturally, unique local organizational and cultural issues were considered and incorporated within any alterations to the 'pilot' review conducted in Yap. For example, Kosrae DOE counterparts agreed that individual and group workshops would be more effective in eliciting information than using the 'questionnaire' approach during the Yap review. Additionally, Kosrae DOE does not possess a departmental policies and procedures manual similar to the manual utilised by Yap DOE. Therefore, alternative methods needed to be adopted so as to identify operational procedures.

Structure of Report

Where possible, the structure of the Yap Audit Report has been replicated within this report. This is particularly so with regards to the structure of the audit categories. Slight alterations do appear, however any differences relate specifically to the unique characteristics of the areas of review and findings of the Kosrae DOE operational environment.

As with the Yap Audit Report, this Kosrae report will consist of four sections. These are:

Section One: Category 1. Strategic Management

This section contains themed tables outlining sources, criteria and means of verification used to conduct the audit, plus a determination of the extent to which the Department of Education is in compliance with the criteria. The compliance determination is accompanied with a narrative including a functional analysis of relevant management processes, recommendations and action plans.

This category includes key functions of educational management and development. It includes the collection and analysis of data and other sources of information; the formulation of medium and long-term strategies; the development of annual programme plans and budgets; monitoring and evaluation and reporting.

Section Two: Category 2. Pedagogy

This section contains themed tables outlining sources, criteria and means of verification used to conduct the audit, plus a determination of the extent to which the Department of Education is in compliance with the criteria. The compliance determination is accompanied with a narrative including a functional analysis of relevant pedagogical processes, recommendations and action plans.

This category includes key functions of education service delivery. It includes the preparation, trailing and approval of curricula; the design, development and distribution of textbooks; selection and distribution of teaching and learning materials; initial and in-service training of teachers; school monitoring and inspection and student testing.

Section Three: Category 3. Administration

This section contains themed tables outlining sources, criteria and means of verification used to conduct the audit, plus a determination of the extent to which the Department of Education is in compliance with the criteria. The compliance determination is accompanied with a narrative, including a functional analysis of relevant administrative processes, recommendations and plans.


This category includes key functions of system administration, operations and routine maintenance. It includes human resource management; administration; filing and logistics.

Section Four: Findings from interviews, conclusion and stakeholder discussions

This section contains a report and analysis of the findings of interviews and questionnaires conducted with staff of the Department of Education, including principals and teachers, as well as stakeholders and employers.

** Note: - The review of Kosrae DOE found a number of issues identical (and relevant) to the Yap review. While seeking to ensure this document can be reviewed as a 'stand alone' evaluation of Kosrae DOE, issues and findings complimentary with those of Yap will not always be repeated in this report. In those circumstances and in order to avoid excessive replication of material, the reader will be referred to the appropriate section of the Yap report.*

*** Also Note: That the performance Indicators in each of the Audit tables have been color coded to clearly identify status as either in:*

1. Compliance  2. Partial compliance  or 3. non compliance 

Organizational Profile

The State of Kosrae has an estimated population of about 6,500. According to the 2000 FSM National Census, population demographics are – 50.2% males and 49.8% females. Student enrolment rate is 71.8% Elementary School and 83.4% High School.

Kosrae DOE is an organization of 259 employees (190 teachers and 69 Department Staff). Approx. 60% are on contracts and the remainder are employed under Public Service agreements. When the current Director commenced in 2007, only about 20% were on contracts (Exact number can not be determined).

The annual budget for DOE is \$4.1M. (Sector Grant - \$2.8M plus SEG \$1.3M)

There are seven (7) facilities within the Department – 6 Elementary schools, 1 High School and Department Headquarters (located on the same grounds as the High school. Schools are located in the following Municipalities:

- Utwe
- Malem
- Sansrik
- Lelu
- Tafunsak
- Walung
- Tofol. (High School)

The following table indicates the number of students per grade for each Elementary School (2009).

Grade	Utwe			Malem			Sansrik			Lelu			Tafansak			Walung		
	M	F	T	M	F	T	M	F	T	M	F	T	M	F	T	M	F	T
ECE	16	16	32	11	11	22	11	10	21	22	28	50	23	16	39	7	4	11
1	13	11	24	16	14	30	6	10	16	21	24	45	34	26	50	2	6	8
2	10	12	22	19	16	35	13	6	19	24	31	55	32	14	46	4	5	9
3	9	16	25	11	9	20	9	12	21	21	24	45	30	21	51	5	2	7
4	16	13	29	16	15	31	9	11	20	24	26	50	31	32	53	3	1	4
5	15	14	29	14	17	31	10	12	22	24	13	37	16	23	39	5	1	6
6	16	15	31	12	20	32	10	11	21	26	16	42	16	24	40	4	1	5
7	9	12	21	13	12	25	7	7	14	34	23	57	25	24	49	4	3	7
8	12	10	22	12	16	28	7	6	13	26	24	50	19	25	44	3	3	6
9	14	5	19	18	5	23	9	8	17	24	27	51	21	9	30	5	2	7

The following table indicates the number of students per grade for the High School (2009).

Grade	Students Male	Students Female	TOTAL
10	73	72	145
11	157	103	260
12	51	77	135

There are 11 World Teach volunteers with the Department, All but 1 providing teaching services at the High School. The World Teach program is in it's 2nd year of operations.

The total population for Kosrae State in 2000 was 7,686. The 2000 Census predicated a growth rate of .89% annually. While no official population figures will be available until the next census (2010) it is widely accepted that the current population is 6,800. If this anecdotal figure is to be generally accepted, this represents a decrease of 11.5% for the Kosrae State population in the past 10 years.

SECTION ONE: CATEGORY 1 – STRATEGIC MANAGEMENT COMPLIANCE

Mission, Goals, and Policy

While 20 indicators have been identified by JEMCO as a means of measuring systems inputs and some outputs (refer to Management Audit and Functional Analysis Report – Yap State Department of Education – P16), the auditor agrees that the 20 indicators provide limited capacity to meaningfully determine the extent to which a State DOE is achieving its mission and goals. It is recommended that key educational personnel review the 20 indicators and identify alternative, meaningful and useful measures of educational progress (**Recommendation 1 refers**).

While Enrolments (2007-08) by gender fluctuate wildly in Elementary Schools, enrolments overall, the number of boys (915 – 50.3%) and girls (903 – 49.7%) enrolled is almost equal. However, enrolments for the High School show a disparity where there is a significantly lesser number of girls (231 - 42.7%) enrolled than boys (298 - 57.3%). Population census figures for 2009 indicate that the ratio of males to females in the community is 49.8% to 50.17%. There does not appear to be an internal monitoring system to interpret population data and school enrolment data. The Kosrae DOE Strategic Plan 2008-2012 acknowledges the need to obtain and analyse enrolment data more closely.

Elementary Enrolment by Grade for SY 07-08 (Source – PRIDE Report – Additional Information in Support of It's Strategic Plan Document).

	ECE	1 ST	2 ND	3 RD	4 TH	5 TH	6 TH	7 TH	8 TH	9 TH	TTL
Male	119	88	81	89	86	75	86	107	92	92	915
Female	116	99	102	101	98	68	75	73	82	89	903
Total	235	187	183	190	184	143	161	180	174	181	1818

High School Enrolment by Grade for SY 07-08 (Source – PRIDE Report – Additional Information in Support of It's Strategic Plan Document).

	10 TH	11 TH	12 TH
Male	134	73	91
Female	96	67	68
Total	230	140	159

The FSM National Standardized Test (NST) is a standards and benchmark based national examination administered in English and Mathematics at grades 6, 8, 10. Information is normally presented in proficiency levels of advanced, proficient, basic and below basic. Normally basic or below basic indicates need for improvement. Kosrae DOE has, commencing from this year, adopted an

alternative method of grading tests. Testing involves setting benchmarks on 17 items and rating as, competent, minimum competent, approaching minimum competency and finally well below competency. Students who score at competent and minimum competent have reached the benchmark. By then presenting the data in that format, teachers can more exactly interpret the areas of strengths and weaknesses. On the NS normal grading, large numbers of students are rated at below basic but no other useful analysis can be drawn as to specific areas of response. Advice on the type of scoring being adopted by Kosrae DOE was provided by PREL in the light of deficiencies in the current scoring and grading system.

Focus group workshops conducted with each school as part of this audit indicated that schools do receive data on the results of the NST and the Kosrae assessments. However, there seems to be a lack of any deep analysis of the data with the intention of developing responding and solving any weaknesses identified. As little analysis is conducted of the data, strategies some teachers employ to address poor results in specific areas are ad hoc and their value questionable. Responses to assessment data are generally undertaken by the Director himself. It is recommended that the Kosrae DOE Director, convene a working group of specialist teachers to review and analyse NST and Kosrae State assessment data and develop strategies for addressing areas of weakness or concern. (**Recommendation 2 refers**).

While state comparisons on 6th Grade English and Maths indicate Kosrae is doing better compared to other States, the number of students requiring improvement due to being rated as Basic and Below Basic across all grades for English and Maths is extremely high. Kosraean students are on average 3 to 6 grade levels below U.S. and international standards. A combined Kosrae DOE and Pacific Regional Initiatives for the Delivery of basic Education (PRIDE) workshop was held in Kosrae in December 2007. In addition to analysing information to support the development of the Kosrae DOE Strategic Plan 2008 – 2012, the workshop was primarily designed to develop an understanding of the status of the education system and determine where the education focus must be directed to support improved student learning and achievement. In its January 2008 Report, it stated, “*A weakness of the education system has been looking primarily at average or combined scores on various tests without looking in detail and against specific standards and benchmarks*”. This workshop demonstrated a commitment by the DOE in 2007 to address the issue of student learning and achievement. Nineteen (19) strategies were identified to address those issues, including targeting identified student weaknesses, using action research and assessment to determine what learning techniques have the most impact on student learning, provide training in instructional techniques, provide training for class formative assessment for teachers, setting policies and procedures, set specific improvement goals, report widely against improvement goals, provide training and mechanisms for community involvement in determining quality of education and adopting a Quality Management approach to projects.

It was interesting to note that during the 2010 COM Essay testing (Group A) of Kosrae High School Students finished 3rd overall out of students from 26 schools across the FSM. (Two private schools – Xavier and CCA finished first and second respectively). Kosrae High School (Group B) finished 7th overall. Out of the 7 students (FSM wide) who attained a perfect score of 50, 3 were from Kosrae High School. (For ranking of combined mean essay scores – Kosrae High School Students ranked at 28.72 the highest public school mean for all of FSM and 9th out of all schools – public and private) (Highest mean was Xavier College Chuuk with 44.66).

It is commendable that the Kosrae DOE took the initiative to examine the issues relating to student learning and achievements (through the PRIDE workshop) and to incorporate objectives and strategies within their Strategic Plan. However, it is felt that with such a good start, the momentum has been lost to actually follow through on the planned strategies. It is felt that an opportunity has been let slip in not pursuing the PRIDE Workshop findings. It is recommended that the Kosrae DOE revisit the strategies identified out of the PRIDE Workshop and reconsider approaches with the view to implementation of those strategies. (**Recommendation 3 refers**)

The Kosrae DOE has in recent years embarked on accessing the World Teach Volunteer program with young international teachers who in most cases possess educationally based tertiary qualifications. At present there are 11 WTP Volunteers engaged by the DOE. All but one are providing teaching services at the Kosrae State High School. While this initiative is again commendable, embracing the full benefit of the program is not being taken. Meaningful interaction between local teachers and the WTP Volunteers is not being fully realized. Volunteers were provided some orientation, but their integration into the educational system is patchy. No volunteers were given clear guidance on the development of curriculum for the subjects they had been assigned to and in nearly all cases, volunteers researched and sourced their own materials. Volunteers were not given copies of the Department’s strategic plan so that a shared vision (with local teachers) of the direction of educational services could be developed. Most volunteers were unaware that a curriculum framework (nor National standards) existed until just prior to the audit. Some volunteers were actually first informed of the existence of a Curriculum specialist within the department during interviews with the auditor. The continued use of the WTP is strongly supported by the auditor, however, it is recommended that a more thorough orientation is developed for future volunteers, such orientation to incorporate presentations from all key and relevant Kosrae DOE specialists so as to assist volunteers in preparing and delivering educational services in accordance with DOE strategic direction. (**Recommendation 4 refers**). It is further recommended that a more structured forum exist whereby collaboration and the sharing of information and expertise between volunteers and local teachers is achieved (**Recommendation 5 refers**).

Below - Audit Table 1 – incorporating Performance Indicators 1 to 8

	Source	Criteria	Means of Verification	Compliance Status
1	Mission Statement	The State Educational Mission is “to provide a student-centered education system that develops the skills, knowledge and values of the youth and young adults of Kosrae to become responsible, productive and life-long learners and be competitive locally and globally.	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	Partial compliance In state comparisons of student performance in national standardized tests, Kosrae is doing better compared to other states. Using the NST current scoring method, student scoring at advanced or proficient levels are low. Conversely, scoring at below basic are extremely high, in some cases at 75%. (Note Kosrae uses an

				<p>alternative scoring method which identified benchmarks)</p> <p>On Comet, Kosrae high school scores are above average, ahead of PICS, Yap and Chuuk, but still below the score of 700 associated with entrance into an associate degree program. (Note - Kosrae DOE is currently paying student costs in relation to sitting for the TOEFL and SAT tests which give are intended to give a clear picture of how 'college ready' students are. There is limited evidence of a 'student centered' approach to education, with the standard principally being 'teacher centered' style.</p> <p>Grade level equivalent score for students entering Kosrae campus is 7 to 7.5.</p>
2	Strategic Goal One and Objectives	<p>Enhance quality of teachers and support staff to promote student learning ad achievement:</p> <ol style="list-style-type: none"> 1. By 2012, 20% of all teachers obtain BA/BS degree with a major in Education or core subject area he/she is teaching 2. Establish rigorous in service training for instructional and support staff and induction programs to new teachers 3. Establish and incentive program for high performing teachers and staff 4. Review and enhance the state scholarship program 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Compliance</p> <p>Currently, about 20% of teachers in the High School (including part time, contracted teachers and members of the WTP) have degrees. 10 teachers are enrolled in University programs. It is unlikely the 20% goal will be achieved by 2012 across the entire organization. <i>Note – the Director advises that the 20% with degrees listed in this objective was meant only to involve High School teachers.</i></p> <p>An ongoing and regular 'in service program' has not been instituted within the DOE, however, the Director instituted the K-Tec where</p>

				<p>in service summer conferencing is held. This commenced in 2009.</p> <p>An incentive and award program has been instituted. Teachers successfully completing the NST Teachers test receive a \$300 cash bonus. Teachers gaining an AA/AS receive a pay increase of \$1,000 annually.</p> <p>An independent review has only recently been commenced of the State scholarship program</p>
3	Strategic Goal Two and Objectives	<p>Increase parent / community involvement:</p> <ol style="list-style-type: none"> 1. Enhance parental and community involvement in educational decision making 2. Inco-operation with local communities, establish Municipal Awards for both high performing students and parents 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Partial compliance</p> <p>There has been some increased community involvement in the decision making processes though systematic PTA meetings with a community member for each municipality being appointed to the Advisory Board. Municipal awards have not been established in a formalized manner.</p>
4	Strategic Goal Three and Objectives	<p>Provide for testing and program evaluation</p> <ol style="list-style-type: none"> 1. Enhance the testing and assessment program to increase support for student learning and achievement 2. DOE will develop and implement a program evaluation system to ensure that all elements of the department support student learning 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Compliance</p> <p>A new grading system and other enhancements of the testing and assessment program through benchmarks have been established.</p> <p>Instruction has been given to principals and support staff on formative assessment.</p>
5	Strategic Goal Four and Objectives	<p>Promote continuous improvement of the education system:</p> <ol style="list-style-type: none"> 1. Improve technology and infrastructure and provide 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Partial compliance</p> <p>All schools have internet access and there has been an increase in access to internet facilities by</p>

		<p>accessibility to all levels</p> <ol style="list-style-type: none"> 2. Link planning, resource allocation and assessment 3. Improve communications at all levels /among stakeholders including students and teachers 4. Establish a code of ethics for the department 5. Enhance the Education Management Information System (EMIS) 		<p>students.</p> <p>No Technology Plan has been developed as OIA have indicated they will fund an FSM wide Technology Plan.</p> <p>A comprehensive Webpage was developed</p> <p>There is local level involvement of linking resource needs to planning. A code of Ethics has been developed.</p> <p>EMIS is still centrally based and inputs approaches from a school level are antiquated.</p>
6	Strategic Goal Five and Objectives	<p>Enhance instructions and curriculum:</p> <ol style="list-style-type: none"> 1. Provide learning-centeredness in all classroom instructions and other instructional settings 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Non compliance</p> <p>Move to a learning centered approach his not noticeably observable nor consistent across all schools. No evidence was produce to be able to measure this criteria.</p>
7	Strategic Goal Six and Objectives	<p>Provide appropriate learning environments and facilities:</p> <ol style="list-style-type: none"> 1. DOE will develop and implement a facilities evaluation system to ensure that all schools meet a set standard before the beginning of each school year 2. Ensure that all schools will be equipped to provide Internet access to students, staff and the communities 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Partial compliance</p> <p>Facilitates in 3 locations are been significantly upgraded with new classrooms being constructed. Classrooms across most schools have witnessed appropriate resource improvements over last 3 years to achieve basic standard. All schools have internet access.</p>
8	Kosrae State Constitution Article XII Section 1	The State Government shall promote education and health	Evidence of promoting quality educational services to the community	This criteria is too broad and non specific so as not to be measurable. Though recent allocations to school facilities has recently been increased.

Responsibility and Authority of the State Director of Education

It must be in the first instance clearly stated in this section of the report that the fact this criteria is assessed at only 'partial compliance' is not in any way intended to suggest that the current Director of Kosrae DOE is 'partially' doing his job. Interviews with internal and external representatives have indicated that significant advances have been achieved in recent years through the efforts of this Director. The individual personal drive, initiative and commitment of the Director has resulted in enhancements to the administration and operations of the DOE.

The reason 'partial compliance' has been assessed is that the roles and responsibilities of the person appointed as Director DOE are not adequately documented or outlined in any Kosrae State legislation nor in the contract of services. The absence of documented tasks, roles, responsibilities and authority means that no measures exist to assess whether or not the person in that position is performing to the standards and expectations of Government and the community. Without that clarity in documented expectations, the next person may or may not adequately perform in the role.

While the current Director does appear to be performing to a high standard, it is felt that when his tenure in the position is completed, that commitment and expertise in effort may be lost. In fairness to the next person appointed to the position, they will have to individually make a personal determination as to the duties to be performed.

Government needs to clearly outline expectations it has on persons who fill Director positions. Much as the same way a duty description informs any employee, detailed roles and responsibilities for the position of Director of DOE must be developed and articulated to the person in the position. It also provides a means of measuring the performance of that individual.

As the position is a "Cabinet" position, the roles, responsibilities and authority of a person in that position should be provided for in legislation. At a minimum, the scope of services within the person's contract should list all tasks and functions required. It is recommended that the State Attorney General consider inclusion of roles and responsibilities within future Contracts of Service for persons fulfilling that position and also to explore legislative amendments which clarify and detail the functions to be performed. **(Recommendation 6 refers).**

The issue of the absence of a formalized DOE policy and procedures manual also compound the risks that a Director (without clarity in their roles and responsibilities) has no other guiding documents to support them in their duties.

It is also a matter of concern that the Director is not a full member of the State Education Advisory Board. His current status is as an ex officio member. The practical reality of the Director of Education not being a full member of a Board established to advise on DOE issues is not fully understood by the auditor.

Below - Audit Table 2 – incorporating Performance Indicator 9

	Source	Criteria	Means of Verification	Compliance Status
9	Scope of Services in Director of Education Contract.	<p>The Governor assigns to the State Director of Education all responsibility and authority for the educational programs and administrative procedures of the Department of Education.</p> <p>Furthermore, the State Director of Education shall establish all necessary policy and procedures to ensure the day-to-day operations of the Department in accordance with the Federated States of Micronesia Codes and applicable state laws.</p>	<ol style="list-style-type: none"> 1. Duties performed by Director 2. Policies which support 'day-to-day operations 3. Familiarity by staff of required policies and procedures 	<p>Partial Compliance</p> <p>The Director is fulfilling all requirements under his contract. However, the contract scope of services is broad and does not specifically outline all activities to be performed.</p> <p>While this Director is competently performing the tasks required to deliver educational programs, the contract is found to be 'wanting' in its description of roles and responsibilities.</p> <p>Additionally, Kosrae Statutes do not clearly outline all the roles and responsibilities required of a person in the position of Director DOE.</p> <p>No formalized policy and procedures manual was provided to the auditor and this area can not be measured.</p>

Education System – Role of Administration of DOE

The role of administration of the Kosrae State DOE is outlined in the Kosrae State Code of Laws. Five requirements are set out in the legislation. In addition to the SCL, the Compact of Free Association (Amendments of 2003) requires sector grant funding to be used to support and improve educational systems at primary, elementary and secondary level and to direct resources towards advancing education systems, providing vocational training, improving accountability, raising staff skill levels and making education relevant to the needs of economy.

The Kosrae DOE is currently running an intensive vocational program for High School Students. The T3 program is a National program for out of school people and the Kosrae DOE responded to the needs of High School students by establishing a number of specific vocational placements in pre-nursing, hotel duties, cosmetics, early childhood training, air conditioning repairs and is next year adding military preparation. Students in these programs spend 3 classes per day in the placement situations.

This audit did not find a regular in-service training program the development of skills for teachers, with the exception of the annual 1 week K-TEC. Tertiary qualification programs do exist and are supported by the department, however the benefits of widespread teacher in service programs are absent. Under current programs, benefits are limited to a small number of teacher staff.

It is recommended that vocational a structured and regular in service training program is developed and implemented for teachers. **(Recommendation 7 refers)**

Below - Audit Table 3 – incorporating Performance Indicators 10 to 12

	Source	Criteria	Means of Verification	Compliance Status
10	Compact of Free Association Amendments of 2003 Agreement Concerning Procedures for Economic Assistance Article 11 (1) (a). P.144	The education sector Grant shall support and improve the educational system of the Federated States of Micronesia, including, without limitation, the systems for primary, secondary, and post-secondary education, respectively, and develop the human and material resources necessary for the Federated States of Micronesia to perform these services. Emphasis should be on advancing a quality basic education system	<ol style="list-style-type: none"> 1. Sector grant funding is used to support and improve educational systems at primary, secondary and post secondary levels. 2. Material resources have been developed to support educational systems with an emphasis on: <ul style="list-style-type: none"> – Advancing basic education systems – Providing secondary education or vocational training to qualified students 	<p>Partial Compliance</p> <p>Sector grant funding is being used for the purpose of supporting educational systems.</p> <p>Materials and resources have been developed to support educational systems, however there is limited or no emphasis in areas such as raising staff skills levels and improving relevance of education to needs of economy.</p>

		according to performance standards appropriate for the Federated States of Micronesia, providing secondary education or vocational training to qualified students, improving management and accountability within the educational system, raising the level of staff quality, including teacher training, and improving the relevance of education to the needs of the economy.	<ul style="list-style-type: none"> - Improving management and accountability - Raising level of staff skills - Improving relevance of education to needs of economy 	
11	Kosrae State Code of Laws, Title 5 (The Executive), Chapter 2 (Organization) §5.202 (2)	The Department of Education shall <ul style="list-style-type: none"> (a) provide academic and vocational guidance for elementary and secondary education, giving special attention to handicapped minors; (b) conduct teacher training and evaluation; (c) develop relevant curriculum; and (d) provide career counselling services to students (e) administers youth, senior citizen and women's affairs programs, preserves and promotes traditions and cultural heritage 	Programs have been developed and are being implemented to fulfil the (5) requirements of the Code	Partial Compliance As with the previous criteria, limited emphasis on teacher training nor providing academic and vocational guidance. The department does not appear to be administering and senior citizen or women's affairs programs however funds some women's program when requests for funding are received. Senior citizens are utilised in the cultural skills program within DOE
12	Kosrae State Code of Laws, Title 12 Chapter 1 12.101	The school year for all schools consists of: <ul style="list-style-type: none"> - no fewer than six hundred fifty hours of classroom instruction for first and second graders, 	<ol style="list-style-type: none"> 1. That the level of instructions meets minimum requirements 2. Start and ending dates align with educational and 	Compliance School years comply with the instructional hours outlined in Kosrae SCL School start and ending dates are

		<ul style="list-style-type: none"> - no fewer than eight hundred hours of classroom instruction for third graders and - no fewer than nine hundred hours of classroom instruction for fourth through twelfth graders. <p>The Director of the Department of Education establishes beginning and ending dates of the school year to suit Government school needs and customs.</p>	community expectations	determined at a local level by Principals but are approved by the Director.
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Organization of the Department of Education

The current organizational chart was developed by the previous Director, however the date that it was approved by the Kosrae State Legislature can not be established. The organization is composed of 3 Divisions (achieved by collapsing the Divisions of Instructional Services and the Division of Curriculum). The KSC has not been amended to reflect the State Legislature approval.

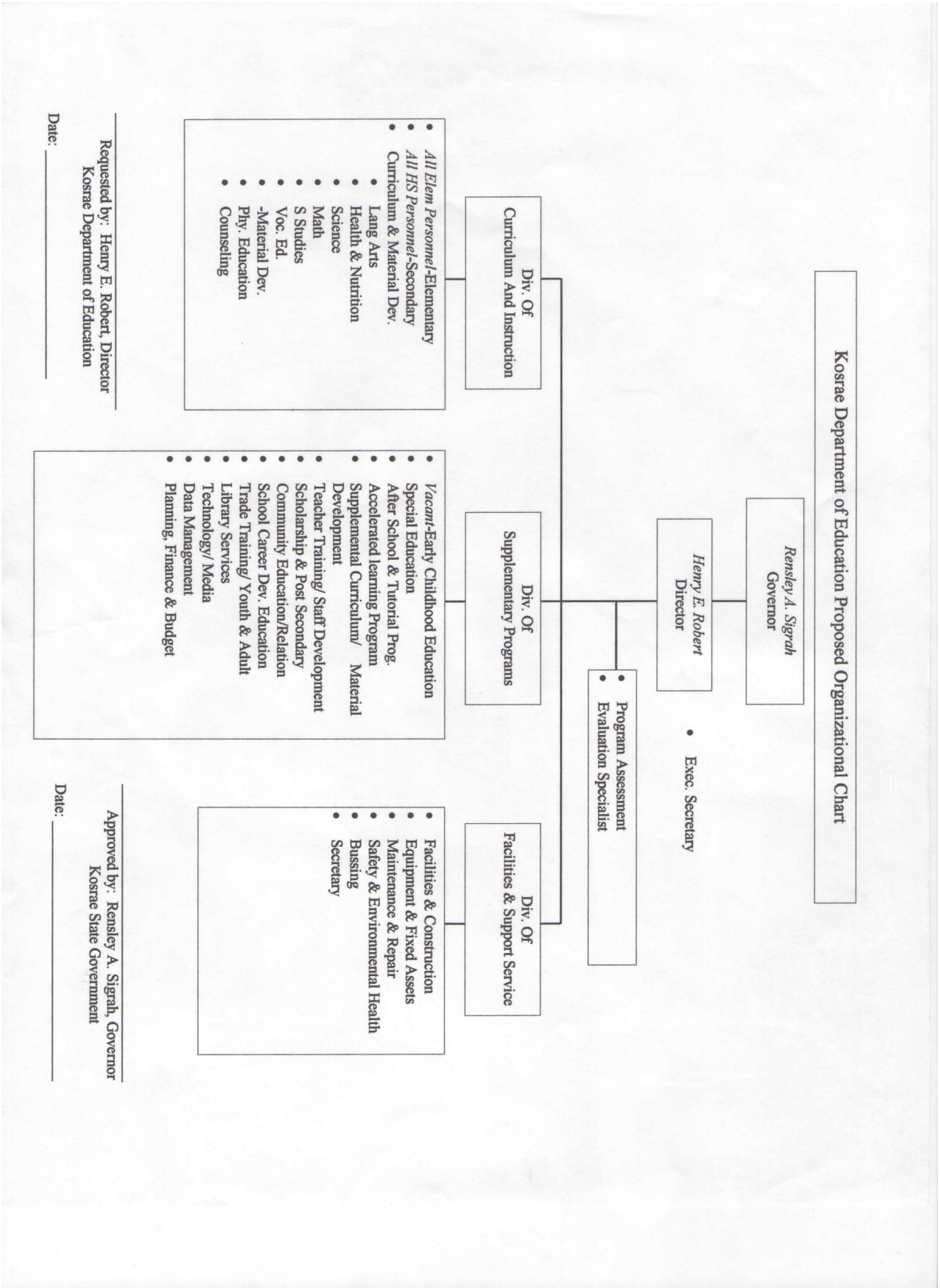
The chart does indicate the Divisions and the broad functions under each Division. The recently established State Education Advisory Board and its relevance are not indicated.

The chart does not cascade to the individual structures of each school, the specific functions and tasks within divisions, identifying the positioning and roles of coordinators and subordinates or the reporting and other relationships between hierarchical layers within the organization.

Pages 22 to 30 of the Management Audit and Functional Analysis Report – Yap State Department of Education deals with Organizational Chart structure, span of control (supervisors / subordinated, functional analysis of tasks and job descriptions). A number of recommendations are made on P30 of that report. This audit supports the comment made in the Yap DOE Report and the recommendations made.

Below - Audit Table 4 – incorporating Performance Indicators 13 to 14

	Source	Criteria	Means of Verification	Compliance Status
13	Kosrae State Code of Laws, Title 5 (The Executive), Chapter 2 (Organization) §5.201 (3)	The Department of Education shall be composed of the Divisions of Instructional Services, Division of Curriculum Development and Evaluation and Division of Facilities and Special Services	Organizational structure of department	Compliance Kosrae State Legislature approved the combining of the Divisions of Instructional Services and Curriculum into one Division.
14	Resolution of State Legislature	The State Director of Education will, consistent with the requirements of State Legislature, develop a draft organizational chart showing: <ol style="list-style-type: none"> 1. Staffing patterns. 2. Departmental functions. 3. Lines of authority and responsibility. 4. Location of managerial personnel. 	Organizational chart reflecting structure outlined by Legislature	Non compliance The current organizational current does not show: <ol style="list-style-type: none"> 1. Staffing patterns. 2. Departmental functions. 3. Lines of authority and responsibility. 4. Location of managerial personnel.



State Education Advisory Board

A State Education Advisory Board was created in late 2009 and at the time of this audit, the Board had only met twice and was still in the process of Board structuring arrangements. No specific issues or advice (from an educational systems standpoint) has been entered into at this time.

The Director is an ex-officio member and the practical sense of that is questioned, given that the Director and Board should be in a position of close exchange. As an *ex-officio* member, he can be excluded from Board meetings at the will of the Board.

No private schools are represented on the Board at this time and the Board is currently addressing this issue.

It is recommended that Kosrae Government consider amending the status of the Director on the Board and that private schools be approached by the Chairperson of the Board to nominate a representative as a matter of priority. (**Recommendation 8 refers**).

Below - Audit Table 5 – incorporating Performance Indicators 15 to 17

	Source	Criteria	Means of Verification	Compliance Status
15	Kosrae State Code of Laws Chapter 7 §7.701 (1)	There is to be established an Education Advisory Board consisting of 8 voting members representing each elementary school, the High school and one representing private schools	Membership representation on the Education Advisory Board fulfils statutory requirements	Non Compliance There is not currently any representative on the Advisory Board for private schools. Note this is being addressed. Also not, this is a matter for the Advisory Board and not DOE.
16	Kosrae State Code of Laws Title 7 Chapter 7 §7.701 (2)	The State Director of Education MAY serve as an ex-officio member of the Board	Level of representation by the Director of Education on the Board	Compliance The Director is an ex-officio member. The board has only met on two occasions since being created and at this time has focussed on Board structural issues.
17	Kosrae State Code of Laws Title 7 Chapter 7 §7.704 (2) (a) and (b)	The Board shall: (a) Provide advice and assistant to the Director to promote and establish a comprehensive education development plan consistent with the overall plans and objectives of the State	<ol style="list-style-type: none"> 1. Level of advice provided on the development of an educational development plan 2. Consistency of educational development with State Government objectives 3. Extent of advice provided to 	This criterion can not be measured at this time as the Board has only recently been created and met on 2 occasions. The business of providing advice has not commenced as the Board is still establishing Board structural arrangements.

		Government. (b). Advise the Director on matters concerning educational policies and objectives.	Director on educational policies and objectives	
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Employment Practices

In recent years, significant efforts have been taken to have most of the teachers employed by the department meet minimum standards of qualifications and to achieve certification. Only a small percentage have yet to gain the necessary qualifications and most of those who are not currently qualified are working towards that achievement.

At the time that Director Hadik took on the role as Director, very few employees or staff (about 20%) were on contract. At this present time, about 60% of staff are on contract. The Director aggressively pursued this course of action so as to free the administrations from the complexities of the Public Service System, particularly regarding, performance, discipline and termination. Staff were given the option of remaining with PSS or moving to contract. The majority elected to move to contract. While the PSS arrangements afford a greater level of job security, those personnel who switched to contracts received greater concessions in relation to other work when on leave and increased salaries.

The recruitment process for personnel (whether the staff member elects to enter the PSS or contract arrangements) are exactly the same. The process involves, the Director advising the Division of Personnel in the Department of Administration that a vacancy exists. The position is defined and Division of Personnel develop an advertisement in accordance with the position description. Applications are received and a list of those applicants is provided to the Director for selection of the preferred applicant. Generally, discussions occur between the Director and the Principal of the school (where the vacancy exists) as to who is the most suitable applicant.

The below table provides details of staff qualifications per location.

Location	MA / MS	BA / BS	AA / AS	Nil	Total
Central Office DOE	3	6	16	24	49
Kosrae High School	0	15	16	11	42
Walung Elementary School	0	0	6	5	11
Sansrik Elementary School	0	0	16	0	16
Tafunsak Elementary School	0	2	25	4	31
Lelu Elementary School	0	0	30	2	32
Malem Elementary School	0	2	20	5	27
Utwe Elementary School	0	0	18	3	21
TOTAL	3	25	147	54	229

Note 1 – 3 different spreadsheets were provided to the auditor. One indicated that there are 180 teachers at the seven schools, another indicated 196, and the third 198 (excluding Principals and vice Principals.)

Note 2 – employees such as bus drivers, maintenance, etc are not expected to attain any degree.

During the course of this audit, a program was established where young people seeking to pursue a career in teaching, are offered teacher aid positions. Advice is given on further studies to be undertaken by those teacher aids so as to gain the minimum qualifications as a teacher. Mentoring is provided to them during what is essentially a 'work experience' program. When vacancies occur, those young people are encouraged to apply for the positions.

The key stakeholder in the employment of persons within the Department is the Division of Personnel. Given the importance to find the most suitable persons for positions within educational system, this audit feels that the DOE should be able to play a greater role in the assessment of all candidates for positions, much the same as policing organizations conducting additional assessments for candidates for vacancies within law enforcement.

It is recommended that a separate assessment program (in addition to the examinations conducted by Division of Personnel) is conducted with applicants for teaching positions with the view of properly identifying the most suitable candidate for selection. **(Recommendation 9 refers)**

Below - Audit Table 6 – incorporating Performance Indicators 18 to 22

	Source	Criteria	Means of Verification	Compliance Status
18	Kosrae State Code of Laws Title 18 Chapter 1 §18.103	The State Public Service System shall be administered in accordance with the merit principles set forth below: (1) Equal opportunity for all regardless of sex, race, religion, political affiliation, ancestry or place of origin.	Analysis of employee qualifications by function. Analysis of data on employment rates with reference to race, sex, color, religion, age and national origin (e.g. breakdown of number of male/female Principals, male/female teachers and male/female employees at DOE.	Non Compliance The Kosrae DOE has adopted the minimum requirements set out in the National Teacher Certification Program. Thirty (30* – 15%) of teachers are assigned to teaching functions who do not meet the minimum standards. Of the 7 school facilities, only one of the Principals is female. This suggests that there is a gender bias in the selection of females to senior positions within the department. * The Director of DOE during interviews believes the number is far less and that only 6 persons do not meet minimum standards

19	Kosrae State Code of Laws Title 18 Chapter 3 §18.301	No teacher shall be employed by the Department of Education as a classroom practitioner unless the recruitment is by advertisement, for the period and by the media which are appropriate in the circumstances. The advertisement shall include at least the position title, the salary, a brief description of the class, the location of the vacancy or vacancies, the qualification standards required	<ol style="list-style-type: none"> 1. Recruitment standards and processes 2. Details / information contained in advertisements 	<p>Compliance</p> <p>The requirements as outlined in Title 18 of KSCL are followed.</p>
20	Kosrae State Code of Laws Title 12 Chapter 3 §12.301	The Director of the Department of Education may require certification of a teacher.	Number of teachers certified	<p>Partial Compliance</p> <p>There is no evidence of a State certification, however, the National Teacher Certification is adopted. It was established that about 30 teachers do not meet the minimum standards for National Certification.</p>
21	Kosrae State Code of Laws Title 12 Chapter 3 §12.302	The Governor provides for integration of State and National certifications of teachers	Level of integration between State and National certification	As there is no state certification standards, this criteria can not be measured with regards to levels of integration.
22	Financial Management Regulations Part 3 §3.2 (b)	All employment service contracts must be signed by the Director of Finance or his designee to certify that such employment is exempt from the State PSS	Legal status of Contracts	<p>Compliance</p> <p>All Contracts of Service are legally verified and correct. The Contractees are exempt from the provisions of the State PSS.</p>

Assignment of Personnel

The issue of assignment of personnel is another area where actions are not guided by documented policies and procedures. However, focus group meetings and numerous interviews with the Director and Principals explored the approaches currently undertaken in situations involving the assignment and re-assignment of personnel.

While no written policy exists, the auditor found consistency in the approach taken across the entire organization. The underlying context of all assignments is based on the best interests of the educational system and the delivery of effective educational services. In the assignment of personnel by either the Director or each of the Principals, issues such as teacher skills, qualifications and certification are taken into consideration. Principals even explore the impact on the area from where the teacher has been moved (in the case of transfers). In all instances, the guiding principal involves placing 'the right person in the right position'.

Performance evaluation is conducted at a school level by the Principals. There was no solid evidence to indicate the role performance evaluation sheets plays in determining suitability of a specific teacher for promotion, transfer or change of status. It appears that reference is made to the *knowledge* possessed (which appears in the performance evaluation forms) regarding an employee's suitability. However, the absence of clearly documented policy to guide this process inhibits openness and accountability in all transfers and promotions. In that regard, it is recommended that the DOE draft policies guiding this activity. (In fact, a manual of policies and procedures across all DOE administrative and operational activities is required – **Recommendation 10 refers**).

Criteria 26 in the table below could not be evaluated. The current Director abolished the positions of Subject Area Specialists. At the commencement of the current curriculum framework development cycle (about 3 years ago) Subject Areas Specialists still existed and in some cases were used to liaise with and support the Curriculum Development Coordinator in the development of the current curriculum guidelines. When the next cycle commences within the next year, it is not known which qualified persons will substitute in the role of Subject Area Specialists.

The issue of the abolition of Subject Area Specialist positions was closely discussed with all teachers who participated in focus workshops. There was a widely mixed reaction to the benefits and / or disadvantages of the fact that there is no longer any person/s who fulfil the position/s subject specialists. A variety of courses of action are taken by teachers to seek solutions or assistance to problems they encounter with regards to a particular subject. Some actually seek out persons who previously filled those positions of Subject Specialist and obtain advice from them. Other teachers raise the problems with peers during monthly staff meetings. While some staff were unhappy the positions of Subject Area Specialists were abolished, there were just as many who did not see it as a counter-productive step. But no matter what the views of individual teachers, one thing was made clear, that ALL teachers are able, somehow to resolve problems they encounter within specific subjects.

When questioned about the rationale for the abolition of Subject Area Specialists, the Director advised that he saw addressing specific subject problems was previously limited in its scope. Now, problems with subjects are discussed at a wider peer level and a greater range of solutions can be identified. Gaining input and advice from a wider range of the particular teacher's colleagues is

viewed by the Director as a more effective way of dealing with that problem. Current approaches by teachers to resolve subject issues appears to support the Director's contention.

The below table indicates the location of employees throughout the department. In the case of schools, the number of students is also included in the table (*Kosrae State Government – Government Expenditure Summary*):

Location	Principal	V/Principal	Teachers	Support Staff	Other Staff	Total	Students *
Office of Director DOE					7	7	
Curriculum /Instructional Services					7	7	
Facilities Community Affairs					15	15	
Special Education			35	8	2	45	
ECE			13	1	4	18	
Workforce and Skill Training					3	3	
Utwe Elem. School	1	1	23 (2 vacant)	1		26	
Malem Elem. School	1	1	20 (3 vacant)	2		24	
Sansrik Elem. School	1		11	2		14	
Kosrae High School	1	1	31 (3 vacant)	6	1	39	
Lelu Elem. School	1	1	28	2		32	
Walung Elem. School	1		10	2		13	
Tafunsak Elem. School	1	1	27	2		31	
TOTAL	7	5	198**	26	39		

* - Student data based on Beginning 2008-09 school year Enrolments

** - Total does not include vacant positions

The below table indicates the Ratio of Teachers / per number of students (Kosrae DOE SY08-09 data).

Location	No. Teachers*	No. Students	Ratio
Utwe Elem. School	21	284	1:13.5
Malem Elem. School	27	287	1:10.6
Sansrik Elem. School	16	170	1:10.6
Kosrae High School	42	513	1:12.2
Lelu Elem. School	32	403	1:12.5
Walung Elem. School	11	67	1:6.7
Tafunsak Elem. School	33	473	1:14.3
TOTAL	182	2,197	1:12

- Number of teachers allocated to each school includes SPED and ECE Teachers

The Department of Education records (SY 09-10) indicate a teacher strength of 182. The Kosrae State Government Expenditure list indicated a personnel strength of 198.

The 2009 Kosrae SEG Integrated Budget Report contained the following information regarding teacher allocations for the SY 06-07:

Schools	Total	Regular	Special Ed	ECE
Kosrae High School (KHS)	41	37	4	0
Early Childhood Tofol Center(ECETC)	3	0	0	3
Severely & Multi Disabilities Program (SMD)	9	0	9	0
Utwe Elementary School (UES)	23	18	3	2
Malem Elementary School (MES)	26	19	3	4
Sansrik Elementary School (SES)	13	10	1	3
Tafunsak Elementary School(TES)	34	27	3	4
Walung Elementary school(WES)	11	9	1	1
Lelu Elementary School(LES)	35	27	3	5
Total	<u>195</u>	147	27	22

The teacher/student ratio for 06-07 was 1:12.8. There appears to be reduction in the number of teachers commensurate with declining student Enrolments.

With the exception of Walung – an isolated community primarily accessible by boat from the main centers in Kosrae, the ratio of teachers to students ranges between 1:10 to 1:14 (1:12 average). There appears to be a reasonable level of consistency in teacher/student ratios, indicating appropriateness in assignments.

Student Enrolments from the SY 05-06 to 08-09 have declined by 265 (-10.7%). (Estimated population changes between 2000 and 2010 anecdotally indicate a decline of 11.5%)

School	05-06	06-07	07-08	08-09	% change*
Utwe Elem. School	275	281	269	284	+3.2%
Malem Elem. School	363	349	332	287	-20.9%
Sansrik Elem. School	163	169	176	170	+4.3%
Kosrae High School	576	580	529	513	-10.9%
Lelu Elem. School	507	530	478	403	-20.5%
Walung Elem. School	74	81	71	67	-9.4%
Tafunsak Elem. School	504	512	467	473	-6.1%
TOTAL	2,462	2,502	2,322	2,197	-10.7%

* - % change between 05-06 and 08-09

** - The 2009 Kosrae SEG integrated Budget report indicates enrolment levels for 05-06 as **2482**; 06-07 as **2539** and 07-08 as **2347**

The decline in Enrolments between 08-09 and the previous year is 5.3%. It is interesting to note that Yap School Enrolments for a similar period between 2004 and 2007 showed a decline of 9.37%.

Significant swings in student numbers, e.g. +3.2% and + 4.3% in Utwe and Sansrik (respectively) and -20.9% and -20.5% Malem and Lelu (respectively) are interesting in that the department is currently able to maintain a teacher/student ratio of between 1:10 and 1.12 across all schools. This indicates the department must be monitoring population / enrolment trends and responding in a manner to maintain acceptable and standardized classroom ratios.

Below - Audit Table 7 – incorporating Performance Indicators 23 to 26

	Source	Criteria	Means of Verification	Compliance Status
23	No documented Policies and procedures exist. Adopted as current practice	The State Director shall make all assignments of personnel to schools based on the best interest of the school system.	DOE criteria for assignment to schools. Teacher assignment data. Equity in assignments.	Compliance No documented policies relating to assignments was provided. Advice on actual approach provided by Director during interviews
24	No documented Policies and procedures exist. Adopted as current practice	State Director of Education bases the assignment upon: <ul style="list-style-type: none"> - Teacher qualifications. - Teacher certification. - Expressed needs of the school. - Best interest of the state system. 	Teacher assignment data. Equity in assignments. Equity in appointments of males and females to Principal and head teacher posts.	Compliance Again no documented policies relating to assignments was provided. Advice on actual approach provided by Director during interviews. Criteria explained by Director considered teacher qualifications and certification, school requirements and in the best interest of the Educational System.
25	Kosrae State Code of Laws Title 18 Chapter 4 §18.401	Performance evaluations shall be used in determining eligibility for retention status in reduction-in-force, promotions, change in duties/reallocation decisions, transfers, change in status (as	Scope of performance evaluations to inform in staffing assignments	Partial Compliance Performance evaluations are completed with each teacher. Their use in determining eligibility for reductions in force, promotions, transfers and status are limited due

		from probation to permanent, temporary to permanent, etc.)		to the provisions outlined in personal contracts.
26	<p>THERE ARE NO AREA SPECIALIST</p> <p>No documented Policies and procedures exist. Adopted as current practice at a local level</p>	<p>Principles will manage use of Subject Area Specialists will be based upon:</p> <ul style="list-style-type: none"> - Assessed needs of the school or activity. - Availability of personnel. - Availability of funds. - Subject Area Specialists will liaise with the Instruction and Curriculum Coordinator to work with teachers to develop instructional material, plan, and assist in teaching methods development specific to the area. 	<ol style="list-style-type: none"> 1. Allocation of Area Specialists. 2. Area Specialists' work programs. 	<p>This criteria can not be assessed as the current Director finished the positions of subject area specialists. Individual teachers requiring specialist assistance appear to be seeking peer review and support. In the past, subject area specialists did liaise with Curriculum coordinator.</p>

Services for Children with Disabilities

The Kosrae DOE SPED Program and the provision of special education services is one area which reflects particularly committed effort by the Director of Education and its staff. The May 2009 Focussed Monitoring Report was extremely praiseworthy and complementary of the department in relation to the SPED program. The report found that ALL areas of previous non compliance, include areas of concern from 2008 and previous years, had been corrected.

- The report made a number of commendations to the department and the SPED program including,
- The number of students being served special education was continuing to rise (from 6% - 153- in 2005-6 to 9% - 197 - this year)
- Correcting ALL outstanding items of non compliance
- Accomplishments in improvements in programs and services offered to children with disabilities
- Special education data system and records management are being implemented in a manner consistent with policies and procedures
- The effectiveness of the KDOE Special Education LPP and the quality and timeliness of Quarterly progress reports
- All referrals for initial eligibility determinations for students are completed within a 60 day timeline
- All areas of non compliance with Fiscal Management have been fully resolved.

The Monitoring report highlighted that the department was now implementing Case Management practices to ensure timely completion and tracking of all special education cases and that a contracted employee (Dr. Vicky Mead) was helping the program build the capacity in providing Educational Assessments for students as required for Initial Evaluation to determine eligibility for Special Education.

In so far as non compliance in areas (as identified in the most recent monitoring report), the report noted incomplete information concerning frequency, duration and location of services recorded in special education folders and that forms had not been fully completed. While the Report noted the IEPs were excellent, eligible students of 14 years and older must have Transition Plans as part of their IEP and it was noted this was not currently being done. Finally, the evaluation found that the SITS data system was not being fully implemented. Advice was given to this auditor that this issue is being rectified and will be completed by the next monitoring evaluation visit.

The Monitoring team specifically (in its report) congratulated the KDOE for being the FIRST FSM State to earn "Meets Requirements" determination level. This is considered a significant achievement also by this auditor.

Below - Audit Table 8 – incorporating Performance Indicators 27 to 34

	Source	Criteria	Means of Verification	Compliance Status
27	FSMC, Title40. Education Chapter 1 §107. Procedures to ensure education for children with disabilities. Source: PL 8-132 § 8. Editor's note: The former subchapter I, §§101-118, "Trust Territory Educational System", of chapter 1 was repealed by PL 6-45, §1. All sections of subchapter II, §§121-128 "Federated States of Micronesia Educational System" were repealed by PL 8-132, §1.	The Secretary shall establish, in cooperation and consultation with the State Directors of Education and Health Services of each State, a procedure to ensure the ongoing identification, diagnosis, certification, and education of children with disabilities.	SPED monitoring report.	Compliance The most recent Focused Monitoring Report (May 2009) noted significant improvement in the efforts of the Kosrae DOE SPED in meeting the requirements of the IDEA and the FSM Special Education Handbook. Evidence of the determination of being raised to the level of 'meeting requirements' was based on KDOE correcting all areas of outstanding non compliance from previous years and the timely submission of LPP and Quarterly Progress Reports.
28	FSMC, Title40. Education Chapter 2 §235. State responsibility. Source: COM PL 7-55 § 5; TT Code 1980, 41 TTC 205; PL 8-21 § 5.	On or before July 1 of each year, each State shall report to the Secretary of Education the extent to which it is providing the special education for children with disabilities necessary to implement this subchapter. The report shall detail the means which the State uses to provide for the free appropriate special education of children with disabilities.	Copies of last 3 annual reports.	Compliance The Focused Monitoring Report in May 2009 highlighted the improvement by KDOE in the timely submission of LPP and Quarterly Progress Reports. The Report commended the KDOE for improvements in the quality of special education program activities with the State Education system and the implementation of the provisions of their LPP.
29	§236. Procedure to ensure efforts. Source:	The Secretary of Education shall establish, in cooperation with the Secretary of the	Copies of last 3 monitoring reports.	Compliance The Focused Monitoring Report found that there had been continual

	COM PL 7-55 § 6; TT Code 1980, 41 TTC 206; PL 8-21 § 6.	Department of Health Services and each State Director of Education , procedures to ensure the ongoing education, identification, location and evaluation of children with disabilities.		improvement in the quality of services within the special education program in Kosrae over the last 3 years. 192 students (9%) of total student numbers are being served in special education, but from 6% in 2 years
30	Federated States of Micronesia Continuous Improvement Monitoring System, January 2007 Individuals with Disabilities Education Improvement Act (IDEA), Public Law 108-446, 14-08.	1. LEA Local Performance Plan. The LPP for each FSM state is submitted to HESA no later than July 30th of each year as part of the FSM Local Education Agency (LEA) Application for IDEA Part B funding.	Copies of last 3 years' performance plans.	Compliance The Focused Monitoring Report evaluation specifically referred to the improvement of quality of services implemented within the State LPP. All reports are being submitted in a timely fashion, according to the Report and noted correction in all areas of non compliance as part of LPP and Quarterly Progress Reports
31		2. School Monitoring Visits. Each LEA is required to establish a local monitoring system that includes conducting monitoring visits to schools to verify the data and information used as part of the LEA Quality Progress Reports and the LPP. 2.1. Determine the monitor or monitoring team responsible for conducting the school visits. 2.2. Establish a school visit schedule that ensures all schools will be monitored at least every 3 years. 2.3. Schedule and conduct monitoring visits to selected schools. 2.4. Transmit LEA School Monitoring Report within 10 days of the visit. 2.5. Facilitate agreed upon	List of members of monitoring teams. School visit schedule for SY2006-2007, 2007-2008 and 2008-2009. Reports on monitoring visits to 3 schools in 3 different zones. Evidence of facilitation of "actions to be taken".	Compliance. Monitoring visits are conducted each year. The 2009 Focused Monitoring Report found that over the last 12 months, the Kosrae DOE had corrected all areas of non compliance for 2008 and also 3 areas of non compliance from 2007.

		“actions to be taken” based on the recommendations developed for the school.		
32		3. LEA Enforcement Actions As part of the LEA Monitoring System, each LEA must establish a system of consequences for identified compliance, non compliance, and improved performance.	System of consequences for identified compliance, non compliance and improved performance.	Compliance The Focused Monitoring Report identified that the previous area of non compliance regarding internal monitoring of programs and services has been corrected. The Report found the Internal Special Education Monitoring Action Plan was effective and has resulted in consistent monitoring of services within each school and reports are now being completed. A person within the Kosrae DOE was now appointed to responsible for Overseeing the internal monitoring system and case management processes.
33		LEA Quarterly Reports On a quarterly basis, the four LEAs submit to HESA a quarterly report that reviews fiscal, compliance, and performance data and information relevant to the IDEA Part B SPP indicators, including formal complaints, mediation, and due process requests and results.	Last 3 Quarterly reports.	Compliance The Focused Monitoring Evaluation found that all reports are being submitted in a timely manner and that training has been delivered to address immediate concerns relating to providing full justifications for all procurements and travel and other fiscal requirements. Quarterly reports address all requirements
34		HESA verification & monitoring, 618 data reports The four LEAs compile and submit the required 618 data to HESA.	Last three 618 data reports.	Partial Compliance The Focused Monitoring Report noted significant improvements in case management, reporting and that special education data system and records management are being implemented in a manner consistent with FSM policies and procedures. 618 Data reports are being

				<p>submitted however, the evaluation for 2009 found minor concerns and areas of non compliance in that the SITS data system was not being fully implemented. The Report recommended that efforts are made to ensure that data system is fully implemented and that all active and Pending cases are entered into the system. The Report also found minor instances of special education folders not properly completed and forms not fully completed.</p>
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Services for Gifted and Talented students

The Kosrae DOE has adopted a program of placement of high achieving students into classes with advanced subject topics, such as calculus, physics, economics, Arabic, US History and British History. Student performance data is available which guides placement into different levels within high school, for example, classes for each grade are broken up into “a”, “b”, ‘c’, or ‘d’. About 45 to 50 students have been identified as scholastically advanced and / or talented. Programs for gifted and talented children have been developed down to grade 6 level. The students showing greater aptitude are placed in either ‘a’ or ‘b’ classes and then students with less abilities placed respective in other levels from “c” down. As mentioned above, ‘a’ and ‘b’ class students receive separate curriculum to other students.

Determination for placement is made by a collective analysis of NST 8th grade testing, High School entry tests for grade 9, 10th grade NST and teacher observations.

The Director informed the auditor that he felt this program is the only one offered of its type in FSM.

Below - Audit Table 9 – incorporating Performance Indicator 35

	Source	Criteria	Means of Verification	Compliance Status
35	FSMC, Title 40. Education Chapter 1 §106. Gifted and talented students.	The Secretary shall establish, in cooperation and consultation with the State Directors of Education , programs to identify and encourage students who demonstrate an extraordinary ability to learn.	Programs developed to identify and encourage students	Compliance There are programs established down to Grade 6 for students who have higher than average scholastic abilities. In High school, unique and challenging subject topics are provided to these students within a classroom environment.

Public Reporting

The audit found there are some opportunities being taken with regards to providing information to the community on educational programs. The Director regularly attends community PTA meetings to report on Department programs and to field questions and concerns from the community. Principals all hold quarterly PTA meetings with parents and also involve the school in a range of community social and celebratory activities.

However, the information relayed to the community is not documented. The structure of or the information provided and the nature of the meetings with the community are not documented or supported through policy or procedures. This is another area of educational activity which needs directed guidance through Departmental policies and procedures.

As mentioned elsewhere in this report, the State Advisory Board has only recently been established and held two formal meetings. As Board members are still determining a range of Board administrative arrangements, there has not been the appropriate opportunity to report back to the community on information relating to DOE activities and programs.

Below - Audit Table 10 – incorporating Performance Indicators 36 to 38

	Source	Criteria	Means of Verification	Compliance Status
36	No documented Policies and procedures exist. Adopted as current practice	The State Director of Education shall disseminate educational information on State and National policy to the public.	Means of dissemination. Last 3 public announcements.	Partial Compliance No policies are in place to guide this activity. However, the Director attends each school community meeting about 2 or 3 times during the school year to report on Education programs and activities.
37	No documented Policies and procedures exist. Adopted as current practice	Each school Principle will establish forums for reporting to the community of local school programs	Forums which exist Means of dissemination	Compliance Principles all have established quarterly PTA meetings with parents. Extra-curricular activities are developed in consultation with community. However, activities are undertaken upon the discretion of the respective Principal and school and are not guided by policies

38	Kosrae State Code of Laws Chapter 7 §7.705. <u>Dissemination of information.</u>	After each meeting of the Education Advisory Board, the Board members shall call a meeting of their district PTA and share the proceedings of the Board meeting with the local members of the PTA.	Meetings conducted between Board members and district PTA	<p>Non Compliance</p> <p>At this time, while Education Advisory Board Members do attend community PTA meetings, the fact surrounding the recent establishment of the Board and their efforts to establish Board arrangements, means to opportunity to meaningfully report to community has not properly availed itself</p>
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Role of the Community

During interviews with the Director, he outlined his current strategy of moving from a highly ‘DOE Central’ management structure to a more ‘localised school based’ management structure. It is intended that such a move will devolve greater responsibility of school decisions and operations to the Principal and the staff at that school. It will provide an opportunity for greater employee involvement in the decisions which effect the operations of the school and the delivery of educational services. This strategy has only been instituted in recent years and the Director is taking a measured approach to the level of transfer of management / decision making. This strategy and the approach taken is commendable and worthy of praise.

Principals and staff at schools were interviewed about this current approach of moving towards a ‘local school based’ management structure. Interviewees without exception were enthusiastic and supportive of the initiative. Because of this initiative, there was a sense of overt pride and dedication by staff in being able to involve themselves in decisions which will ultimately impact on their ability to perform there duties. Areas where school are able to contribute to the departments decision making process includes, budget preparation, problem solving in matters involving curriculum, performance review of personnel, staff selection and school scheduling to suit community needs.

Some community members spoken to were not actually formally aware of the Department’s initiative of ‘locally based’ management, however, they felt in recent times an increasing capacity to be involved in school activities and a sense that their (community and parents) views were being acted upon at a local level.

It is acknowledged this is a process which needs to be controlled in accordance within ‘change management principles’. It is also recognized that in future years, the scope of activities addressed at a local level will grow. The only concern identified by the auditor in relation to this initiative is that the Director of DOE is guiding the approach to be taken but no real action plan appears to exist. If there is any change in leadership within the DOE, there is a risk that the fluidity of change could be disrupted or stalled. Strategic Goal 2 (Increase parent / community involvement), and Goal 4 (Promote continuous improvement of the education system) contain objectives and strategies which loosely embrace a more locally base management structure, however, a vision of where this initiative will end up and how it intends to get there needs to be articulated. It is recommended that the DOE develop an action plan to incorporate a change management process of moving from a centrally to a locally based management structure. (**Recommendation 11 refers**).

Below - Audit Table 11 – incorporating Performance Indicators 39 to 41

	Source	Criteria	Means of Verification	Compliance Status
39	Kosrae State Code of Laws Chapter 7 §7.701	A member of each community will be represented on the DOE Advisory Board.	That each community has a representative on the DOE Education Board	Compliance Each municipality has a representative on the State Education Advisory Board.

40	No documented policies and procedures	Community/school relations are the direct responsibility of each School Principle. A program will be developed and implemented to utilize community resources.	That each school has a forum for enhancing community local school relations. The types of programs adopted to utilize community resources	Partial Compliance Schools and School Principals use a variety of opportunities, forums and event to enhance school / community relations. However, no evidence was produced of where any program has been developed or implemented to utilize community resources to assist school programs.
41	Compact II (implicit intend)	Initiatives towards Community Based Management practices / structure	Extend and role of community in local school structure	Partial Compliance The DOE is moving towards a school centered management process. Some management opportunities have already devolved to a local level, and the task of an integrated Community Based Management structure still needs more consideration

Strategic Planning

The DOE developed the Kosrae State Department of Education Strategic Plan 2008 – 2012. The stated purpose of the plan is to ‘set a framework for decision making and resource allocation for improving student and achievement over the period 2008 – 2012’. Six (6) Strategic Goals were identified. A range of objectives and strategies for achieving those objectives were developed and are incorporated within the plan. Each strategy is accompanied by various educational performance indicators to determine progress.

The Strategic Plan states (P8) “*The strategic goals, objectives and strategies will be reviewed and updated yearly*”. There is no evidence that any review has been conducted since the Strategic Plan was published 2 years ago.

Generally, a Strategic Plan identifies the vision the organization has for the delivery of its services for the future. Most often, a period of about 3 to 5 years is captured in the Strategic Plan. As mentioned before, a Strategic Plan is a ‘vision and direction’ for the future, and asks 1. *Where are we now*, 2. *Where to de want to be in the future* and 3. *How do we get to where we want to be in the future*. This Strategic Plan has identified a clear vision and sound goals of where the department wants to go. The objectives and strategies appear to be appropriate in supporting (in a broad sense) how the department is going to go about achieving its vision.

Generally accepted practice means Strategic Plans are intended to guide in a long term and broad sense. Naturally, the operating environment can alter which means that activities will need to alter to encompass those changes. Additionally, strategies described in a Strategic Plan are intended to be broad in nature (as they need to embrace the entirety of the diverse functions of the organization). The real substance in achieving the vision and goals of the Strategic Plan is through the development of more localized annual plans. Therefore, each functional area within the organization needs to identify what it has to do on an annual basis to achieve that shared vision. Functional areas, such as schools and specialist areas within the department should prepare Annual Action Plans for their respective and specific areas and detail what actions they will take. Of course, the annual plans need to share the ultimate vision of the Strategic Plan and need to link Annual plans into the broader longer term plan. Because Annual plans are localized in nature and are developed yearly, Annual plans have the capacity to incorporate local imperatives and changes in the operational environment. At the end of each Annual planning cycle, the functional area reviews their performance and identifies what changes need to be incorporated within the next plan.

So, the higher level and longer term Strategic Plan is continually supported through localized level short term Annual plans. The monitoring and evaluation should occur on an annual basis so that a sound course is followed.

In the opinion of the auditor, the Strategic Plan as developed by the Department is a solid document with sound vision and objectives. The broad strategies provide ample guidance for functional areas to base their annual planning actions upon.

In this regards, the department has built into the annual planning process, the development of ‘School Improvement Plans’ (SIP). It is the understanding of the auditor that the Annual Planning process is integrated with the SIPs. However, whatever sound vision has

been articulated in the department's Strategic Plan, is a risk through deficiencies which are evident in the SIP (or Annual planning) process.

Not all schools were able to provide the auditor a copy of the school's SIP. In fact, only 3 of the 7 were able to produce such document. And out of the 3 provided, only 1 SIP (that of the High School) even closely reflects a document which is that facility's action to achieving a desired result.

The common deficiencies noticed in the SIPs were that they appeared to be little more than a reprint of the Strategic Plans with a smattering of local information, intending to give a local flavour to the plan. Some SIPs, while replicating the Goals outlined in the Strategic Plan, did not even align with the dates of the Strategic Plan. Not only were the SIPs not developed to encompass an annual period, they reflected a time frame of 2010 to 2015. So this can give rise to the suggestion that functional areas will 'arrive' as the set goals 3 years after the Organization does through its Strategic Plan.

Each of the local SIPs did commence with a profile of their local operating environment. This did achieve some recognition of the role / positioning of that functional area (or in this case – school) in relation to contributing to achieving broader organizational vision. The SIPs did contain demographic information and also conducted some low level analysis of that data with regards to its impact on school operations. For example, the data included enrolment data, teacher data and teacher/student ratio data. Unfortunately, the data referenced in some SIPs differs from data this auditor sources from the Department of Education. The following are two examples.

1. Utwe Elementary School reference the following teacher, student and ratio data (*in brackets are the figures from DOE provided to the auditor*)

Students in 08-09 – 264 (284); Teacher numbers 21 (23); T/S ratio 12.5% (13.5%)

2. Kosrae High School. Student Enrolments for 05-06 – **603** (576); 06-07 – **591** (580); 07-08 – **580** (529).

It is noteworthy that the High School provided some very useful profile information and statistics to support actions within their plan.

A summary of the strengths in the High School Plan include:

- Inclusion of the school organizational chart
- History of the school indicating past operating environment
- School layout
- Excellent vision and mission statements
- Goals which are aligned to the Department's Strategic Plan but locally focussed
- Objectives and strategies which step out on a yearly basis the approach to be taken
- Good use of NST data
- Graduation and drop out data
- Teacher and student attendance data

- Curriculum overview for each grade
- Disciplinary and conduct information
- An action chart which outlines briefly the strategy, actions required, timelines, persons responsible for action and any cost implications.

An accreditation team has been established and has visited each school in relation to the monitoring of SIPs. The auditor was advised that future visits will be conducted. However, the level of feedback and contribution to future annual SIPs was not clearly evident.

It is recommended that the all functional areas (including schools) need to develop ANNUAL SIPs and that such plans are developed inline with contemporary Annual Action Plan processes. These plans need to have built in evaluation and reporting components. (**Recommendation 12 refers**).

Below - Audit Table 12 – incorporating Performance Indicators 42 to 43

	Source	Criteria	Means of Verification	Compliance Status
42	Kosrae State Education Strategic Plan 2008-2012	Annual work plan (Annual School Improvement Plans) developed and implemented	Current Annual Plan	Partial Compliance All schools required to prepare Annual School Improvement Plans. Not all schools provided those plans. Some Improvement plans did not represent an annual plan of activities but simply seemed to be a reprint of the department’s Strategic Plan
43	Kosrae State Education Strategic Plan 2008-2012	Annual formative assessment conducted and report disseminated	Most recent assessments report on activities to date	Partial compliance An accreditation team has been established to monitor progress of annual plans, however the reports prepared and the extent of feedback could not be determined (with regards to contribution to subsequent plans)

Early Childhood Education

Enrolment data for SY 09-10 is incomplete (the number of enrolments within ECE for Lelu Elementary School did not appear on data system records). For the SY 08-09, there were 210 enrolments (some source documents indicated 235) in the ECE Program. The below table indicated the number of enrolments at each school (including gender breakdown), number of teachers and where possible, a determination of ECE teacher/student ratio.

ECE Enrolments 08-09

School	M	F	Total
Malem Elem. School	22	21	43
Tafunsak Elem. School	31	17	48
Utwe Elem. School	20	17	37
Sansrik Elem. School	11	10	21
Lelu Elem. School	22	28	50
Walung Elm. School	6	5	11
Total Number of Students			210
Number of Teachers			19
Teacher/Student Ratio			1:11

ECE Enrolments 09-10

School	M	F	Total
Malem Elem. School	11	11	22
Tafunsak Elem. School	23	16	39
Utwe Elem. School	16	16	32
Sansrik Elem. School	10	11	21
Lelu Elem. School			
Walung Elm. School	4	3	7
Total Number of Students		approx	171
Number of Teachers			19
Teacher/Student Ratio			1:9

Based on all school totals (excluding Lelu Elem School for SY 08-09 (**160**) and 09-10 (**121**)), there appears to be a decline in ECE Enrolments in the estimated area of 24%. This occurred as a result of changes to the entrance requirements.

Despite the data spread sheets provided to the auditor, the 2009 Kosrae SEG Integrated Budget Report states,

“There are seven centers at the moment serving 235 children with instructional activities, nutritional supplements and other support services through the special education program and health services such as a remedial program, health screening, periodic dental screening, immunizations and evaluation of children suspected with disabilities.

Instruction is delivered on a daily basis for at least 172 days from 8:00 to 12:30 each day focusing on developing the ECE students’ skills in communication, fine & gross motor, social skills, language and numeric literacy and health education.

Currently, there are 23 teachers providing instructional activities in collaboration with the special education program. Fourteen (14) of the teachers are funded under the SEG grant while 9 are funded under the special education program.

Out of the 23 teaching staff 20 of the teachers have AA/AS and 3 are still working toward attaining their degree through the College of Micronesia local campus”.

The Budget Report contains the following activities proposed for 09-10 which includes outcomes and measurements. The review found the following:

Activity	Expected Outcomes	Quantifiable Measures	Achievements / results
Provide quality early childhood services (Basic)			
Provide funding for 15 ECE teaching staff	(a) Maintain adequate teaching staff for the 6 ECE centers	15- teaching staff on payroll	
Training and Upgrading	(b) Better prepared ECE teaching staff	2 - trainings will be conducted to ECE during FY 2009	
Provide instructional materials and supplies to support 235 students	a) Adequate instructional materials and supplies to 6 ECE centers	Attendance records showing 235 students receive daily instructional activities	
Materials Development	b) Align ECE curriculum & instruction to grade 1 curriculum	1 – curriculum development contract let to review, revise and align ECE	
	c) Adapt materials to local language to be culturally relevant	15 – (readers & math workbooks) In Kosraean will be available	
	d) Printing & reproduction	150 story books/workbooks with 20 revised version of ECE curriculum	
Self Monitoring	(a) Adequate yearly progress on project activities	4 quarterly and one annual report	
Provide Support Services to Instructional Activities (support)			
Provide mid-morning snack to ECE students	(a) Students receive mid-morning snacks to 235 ECE students	Records showing 172 days mid-morning snack to 6 ECE centers	
	(b) Develop contract for certified caterer to provide snacks for ECE students	3 contracts to cater for ECE mid-morning snacks for 172 school days	
Maintain transportation services for ECE students	(a) Transportation services are available to 235 ECE students	172 days, transportation services for ECE students is recorded	
	(b) Weekly maintenance of school buses	Records of 35 weekly maintenance of 4 ECE school buses	
	(c) Adequate fuel for bussing services	2000 gallons purchased to support ECE transportation	

	(d) Maintain an adequate number of drivers for ECE transportation services	4 bus drivers on payroll	
	(e) Replace one old and unsafe ECE bus	1 replacement school bus (35 seats) purchased	
ECE facilities maintenance and repair	(f) ECE facilities are in good condition	Monthly assessment and repair list	
Screening & and follow up health and family services	(a) ECE students receive appropriate services	Records show 235 students complete the health, dental and immunization screening	
Data Collection	(a) Daily attendance for students and teachers is kept	35 - weekly attendance report on students and teachers	
	(b) Quarterly & annual assessment of students' performance is made	5 - assessment results on individual child's performance	
Operational related Costs	(a) Utilities will be adequate for 6 ECE centers	12 – months utilities bills paid	
	(b) Adequate administrative personnel support ECE project implementation	1 – ECE coordinator on payroll	

As highlighted under the criteria of Staff Development (P65 of this report) no in-service training is conducted for any teachers. Skills development for ECE teachers primarily includes instruction received at COM while undertaking the AS Degree and summer training workshops (generally of a duration of up to 2 weeks).

It has been observed throughout the audit the conflicting data maintained by various units within the DOE. It was concerning that enrolment data for ECE students attending Lelu Elementary School could not be provided could not be provided to the auditor. Poor record and data maintenance hinders the opportunity to conduct informed analysis of student and program needs. It is recommended that a review is undertaken of data recording systems, not only relating to ECE, but across the entire department. (**Recommendation 13 refers**).

No organizational structure chart exists for ECE nor do any recently developed policy statements. (The Co-ordinator advised that the current ECE Center rely on policy statements developed during the now defunct Early Start Program). However, there is a curriculum structure in place.

A range of assessments and screenings are undertaken to firstly identify students who would benefit from entering the ECE program (for example gifted students and those requiring special education needs). The first screening is a multidisciplinary assessment (Health and Education) and is conducted prior to children are selected to enter the ECE program. This is an island wide assessment

of all children. Once children have been identified to enter the program, progress is charted through the FSMID – FSM Inventory of development (administered quarterly to chart progress).

Below - Audit Table 13 – incorporating Performance Indicators 44 to 48

	Source	Criteria	Means of Verification	Compliance Status
44	Program Regulations and Standards Section 200.10. Class size and staffing pattern.	a) Standard classes must be staffed by a teacher and a teacher aide and, whenever possible a volunteer. Standard class must have a minimum enrolment of 11 children and a maximum of 20 children enrolled. No more than 20 children will be enrolled in any one class.	Teacher and class data	Compliance Analysis of enrolment and teacher data confirms that standards established for class size and teacher / student ratio are being adhered to.
45	Program Regulations and Standards Section 500.20. Management systems and procedures.	At least once each program year, with the consultation and participation of the Policy Council and, as appropriate, other community members, the program must conduct a self-assessment of their effectiveness and progress in meeting program goals and objectives.	Teacher and class data	Non compliance There is no evidence of annual self assessments having been conducted. There is no evidence of a Policy Council in operation
46	Program Regulations and Standards Section 500.30. Human resources management	Organizational structure. The program must establish and maintain an organizational structure that supports the accomplishment of program objectives. This structure must address the major functions and responsibilities assigned to each staff position and must provide evidence of adequate mechanisms for staff supervision and support. This organizational structure must be aligned with the overall departmental organizational structure.	Organizational structure Staff data Staff functions and responsibilities	Partial Compliance While a curriculum structure is established, there is no formalized organizational structure for ECE. There is appropriate screening and assessment processes in place to identify students who would benefit from entering the program and to also chart Progress.

47	Classroom Teachers. ECE programs must comply with all FSM National and state law and any subsequent amendments regarding the qualifications of classroom teachers.	Teacher data	Compliance The minimum standards established by the NDOE for certification of teachers are being met. These standards include a minimum qualification of an AA/AS degree. There are 13 teachers employed in the ECE Program
48	Staff performance appraisals. The program must, at a minimum, perform annual performance reviews of ECE staff member and use the results of these reviews to identify staff training and professional development needs, modify staff performance agreements, as necessary, and assist each staff member in improving his or her skills and professional competencies.	Annual performance review Staff training and professional development	Partial Compliance Performance reviews are conducted twice years for ECE teachers. However, there is no evidence of the results of such reviews directly contributing to and professional development needs or in the improving of teacher skills.

Summary of compliance determinations			
Category 1: Strategic Management			
Not determined	Compliance	Partial Compliance	Non Compliance
4	21	17	6

SECTION TWO: CATEGORY 2 – PEDAGOGY COMPLIANCE

Curriculum and Instruction

A considerable amount of work has been done in the development of baseline curriculum for the State DOE and accompanying teaching and learning materials. However, there is no evidence to show that the department has taken steps to ensure the State Baseline Curriculum aligns with the National Curriculum Minimum Standards. (The auditor was asked to do this as it had not previously been undertaken by relevant personnel within DOE)

The T3 Program commenced in Kosrae in 1988 and has claimed to have trained over 300 trainees in Electrical, Carpentry and mechanical. It was suggested that the number of trainees each year is dropping, but no data was provided to the audit, with the exception of a table which indicates the following:

	2003	2004	2005	2006
Electrical	4	4	14	8
Carpentry	4		5	
Mechanics	9			6

The 2004-2006 Community Short Term Training indicates the following:

	Training	2004	2005	2006
Lelu	Drafting & Estimating	5		
	Blue print reading		5	
	Small Appliance repair	35		
	Sewing machine repair	38		
	Small engine repair			27
Tafunsak	Small Appliance repair	24		
	Sewing machine repair	42		
	Small engine repair		40	
	Small Appliance repair		36	
	Blue print reading			7
Malem	Blue print reading			11
	Small appliance repair			34
Utwe	Small appliance repair	18		
	Sewing machine repair	14		

It appears that in October 2008, 15 trainers undertook training in sewing machine repairs. During interviews with the TS Co-ordinator, the auditor was advised that 1 of the 3 T3 trainers had left Kosrae and not returned. Other problems identified with the program include:

- Dependency on other programs for making training arrangements and funding
- Lack of upgrading for staff
- Lack of training equipment, materials and supplies
- Lack of access to internet
- Lack of computer literacy amongst staff.

Note: The T3 program is a National Program.

A range of vernacular language texts have been developed for Grades 1 to 4 in the areas of social studies and language arts. The standard of these texts appear to be of a high standard and suitable for the needs of students in those classes. However, for Grades 5 and up, all texts are in English with the exception of cultural skills and life long learning texts (Grades 1 to 12) which have been prepared in Kosraean. Text books are sourced from the U.S. and appear to be pitched at a level where English is the first language of the student. These texts are technical in nature and do not appropriately address the needs of Kosraean students. Advice was provided to the auditor that research was conducted about 2 years ago to identify suitable texts, for example – texts written for students where English is a second language, however, little appears to have been done to source these text books following the initial research.

In 2009, the Kosrae DOE spent \$200,000 in purchasing text books from the U.S. When the positions of Subject Area Specialists existed, those personnel primarily assumed the role of identifying the texts to be sources for the entire department. That way, similar texts were used in each school. The auditor was advised that the responsibility now rests with Principals. While the Principal is empowered to select texts more suitable for the students needs within their school, consistency of learning materials used throughout the department is compromised.

Many of the textbooks on the current DOE inventory are sourced from the US and are comparatively expensive. Most World Teach Volunteers stated that when they arrive to commence volunteer duties, that very few texts were provided to them and that WT volunteers actually sourced their own texts (primarily from US) and that copies of those texts are made for students.

Teachers interviewed at schools during focus group workshops indicated they have little influence over the text books supplied by DOE Central office, though most seemed to be satisfied with the texts they were using. Teachers often supplemented texts with research from the internet.

The department has a person who is in the position of Cultural co-ordinator. The focus of the position is developing materials for local language and cultural activities. Cultural Education Programs are developed for Grade 4 to 12 students and there are about 67

community members who provide traditional skills sessions. A range of schedules, materials and session plans are developed by the co-ordinator. Culture Curriculum Standards based guides have been developed for grades 4 to 12 for those community member involved in the program. In 2009, 1,036 students attended the program activities which amounted to 2 hours weekly for 7 months.

Early Kosraean Bilingual materials were developed during a project funded in 2008. Additionally, COM students compiled a 1,500 word junior dictionary.

Below - Audit Table 14 – incorporating Performance Indicators 49 to 56

	Source	Criteria	Means of Verification	Compliance Status
49	FSMC, Title 40. Education Chapter 1 §110. National Curriculum Minimum Standards.	The Secretary shall establish, in cooperation and consultation with the State Boards of Education and the State Directors of Education, National Curriculum Minimum Standards.	Copies of National Curriculum Minimum Standards widely available	Compliance National Curriculum Minimum Standards were developed by a working group, including representatives from Kosrae DOE, and were approved by the State Director of Education at a FACSSO meeting in March 2008. Copies of the National Curriculum Minimum Standards are available to staff.
50	FSMC, Title 40. Education Chapter 1 §110. National Curriculum Minimum Standards.	State Departments of Education and Boards of Education shall ensure that the National Curriculum Minimum Standards are implemented through their State Curriculum framework.	Analysis of State and National Curriculum and evidence of activity to bring about alignment	Partial Compliance A working party was established to ensure National Curriculum Minimum Standards were implemented through the State Curriculum framework. However, there is no evidence to indicate that activities were undertaken to review and compare the two curricula standards.
51		The State Director of Education shall assess and plan the core curriculum and make any changes necessary to the general curriculum.	Published Core Curriculum and general curriculum	Partial Compliance The Director through the Curriculum Coordinator has developed and published a range of Standards based Curriculum Guides for teachers. While the auditor was advised that

			core curriculum has been developed for all subjects and all grades, evidence was only provided for Social Studies and Language arts for grades 1 to 10. No documents were provided for Maths or Science. Focus group meetings with teachers reveals that all teachers use and acknowledge the usefulness of the developed curriculum.
52	The State Director of Education will receive reports of curriculum status from the Curriculum Coordinator. The Curriculum Coordinator will conduct needs assessments, gather test data, gather input from students and the community, and draft all necessary reports for submission to the State Director of Education.	Last 3 reports	Non compliance There is no evidence of report being provided on a regular basis to the Director.
53	The State Director of Education shall establish a core curriculum in which each student shall demonstrate competency prior to graduation from secondary school.	Core Curriculum developed	Compliance Core curriculum has been developed by a working group of subject specialist, secondary and elementary school teachers. There was some support and coordination from the State Curriculum coordinator.
54	Minimum requirements of a core curriculum are: 1. Language –oral and written. 2. Social Studies. 3. Science. 4. Math 5. Vocational Skills. 8. Kosraean Skills and Culture.	Core curriculum documents for all subjects	Compliance School core curriculum benchmarks for English Language, Social Studies, Science and Maths have been developed. Curriculum for vernacular language and Kosraean skills and culture has also been developed
55	The State Director of Education reviews, on an established schedule, all instruction and	Schedule of review	Partial Compliance Detailed reviews of curriculum are conducted on a 5 year cycle.

		curriculum programs offered throughout the State.		Discussions with teachers revealed that this period is too long and the reviews should be more regular, namely 3 years. There appears to be no data of suitability of curriculum on a more regular basis within the cycle
56		The State Director will designate staff persons to review and monitor all instruction and curriculum programs.	Schedule of review Personnel assigned	Non Compliance While there is a program of school and classroom visits by curriculum staff, there is limited reporting of actual observational data.

Staff Development

Staff development is virtually non-existent within the department. While an employee (on paper is supposed to be co-ordinating staff training) was interviewed regarding staff development, he advised that he is responsible for other tasks and has not conducted any TNA on teacher training needs, identified or implemented any training programs for teachers, has not prepared a training schedule or program and has not been involved in any in-service training programs.

The audit learned there has been established the K-TEC program, which is an intensive 1 week per year summer in-service conference held in Kosrae.

While advice was provided that a number of teachers have already or are currently undertaking AA / AS courses, this and K-TEC appear to be the only evidence of further studies in the development of skills for teachers.

This issue was raised at every focus group meeting with teachers. It was the single most united call by teachers for assistance. When asked how individual teachers develop their teaching skills, they advised 'through trial and error' or 'talking with colleagues'.

At Tafunsak Elementary School, the teachers have developed their own in-service skills development program. While only rudimentary in application, this ad hoc program is a lone beacon of light for some teachers with regards to skills development.

It was also established there is no formalized process for the exchange of knowledge and skills between WTP volunteers and local teachers. It is felt that such interaction has benefits for both groups, namely, WTP volunteers can share their knowledge and expertise with local teachers and local teachers can impart skills on teaching which is culturally appropriate and beneficial to students. While the WTP volunteers are only on a short term (1 year) program, the experience some bring (many WTP volunteers have considerable teaching experience and tertiary qualifications) is being lost through no formal exchange program.

There is no denying that the 'profession of teaching' is a dynamic field and constantly evolving. The absence of a fundamental necessity such as a structured in-service program to provide continual development of teacher skills and capacities is probably the single most critical obstacle to raising the standards of education service delivery in Kosrae.

It is recommended that the Kosrae DOE, as a matter of priority, conduct a TNA of teacher training needs and develop and implement a structured in-service training program for teachers. **(Recommendation 14 refers)** It is also recommended that the National Department of Education take a lead role in identifying the minimum national standards of in-service training necessary to be provided to teachers throughout the FSM. **(Recommendation 15 refers)**.

Below - Audit Table 15 – incorporating Performance Indicators 57 to 59

	Source	Criteria	Means of Verification	Compliance Status
57	Kosrae State Code of Laws, Title 5 (The Executive), Chapter 2 (Organization) §5.202 (3)	The Department of Education will conduct teacher training and evaluation	Teacher training programs conducted	Non compliance No formalized teacher training programs are conducted. Teachers are undertaking COM courses for AA/AS but no other teacher training is conducted. Apart from performance evaluation forms, no evaluation is conducted of teacher skills. There has been no training needs analysis of teacher skills and areas of development. No training plan for teachers exists. Some teachers at attending the University of Guam in order to complete Bachelor Degrees.
58	No documented policy	The State Director of Education may establish in service training in skills development and skills upgrading. The in-service schedule will be set by the State Director of Education in the best interests of the Department and availability of trainers.	In service training conducted. Methods used to identify training needs and areas of skill development	Non compliance There are no formalized regular in service training programs not training plans for teacher skills development with the exception of the K-TEC program. No TNA has been conducted.
59	No documented policy	That the Staff Development Coordinator ensures required programs of staff development and teacher training are available.	Programs available	Non compliance The Staff development co-ordinator does not make available any programs for teacher training or skills development

Testing Program

A variety of testing programs are undertaken by the Testing specialist and individual teachers. Some teachers, particularly WTP volunteers have instituted regular (but ad hoc) testing arrangements for subjects taught on a weekly basis.

The testing specialist is responsible for the development and administration of Kosrae Assessment tests (KAT) which are designed 'in-house' to address state curriculum requirements. A testing committee is constituted and involves teacher representation. During the development phase, test content domain and specification are identified including a range of specific test item characteristics. Training is given to test item writers to ensure consistency and accuracy in testing the relevant content areas. There is a built in review process for items written. The guidelines also describe the preparations necessary and the actual administration of the tests. KAT is implemented to supplement NST.

A report is usually furnished to schools, stakeholders and Special unit heads which addresses the areas of 1. difficulty, 2. strengths and statistical measures. Analysis of KAT and NST has been hampered by the fact that the computer used to electronically mark and score has been faulty for a number of years. Marking and scoring is now tediously done by hand, which delays results and leave open an increased risk of error in marking.

It must be noted that a computer hardware fault deleted materials relating to the 2009 testing and the report being developed. Therefore, teachers did not receive the results of that year's testing. (On a slightly positive note, teachers during the focus group workshops highlighted their concerns at not receiving the 2009 report – indicating that teachers ACTUALLY do look forward to receiving the reports and acting on them. The fact no report was received for 2009 was a disappointment expressed by teachers).

An additional source of testing is the College of Micronesia – FSM entrance test (COMET). As neither the state nor national government administers a 12th grade examination at this time, the COMET is used to help gauge learning levels of 12th graders. However, the COMET is not a diagnostic tool.

The testing programs at both National and State levels appear to provide a sound basis by which to assess student learning. There appears to be extensive assessment data which identifies student and system strengths and weaknesses and improvement goals for the education system, and individual schools, and grade clusters.

However, the weakness in the testing and assessment process is evidence in the local analysis and response to the data. During each of the school focus group workshops, teachers were specifically asked how they interpret, use and respond to the data. A lack of defined analysis skills on the part of practitioners indicates that appropriate responses are not being utilised to effectively deal with the weaknesses highlighted in the assessment reports. It is recommended that teaching practitioners and curriculum designers are provided the skills (through training) to be able to conduct detailed analysis and problem solving of testing results. **(Recommendation 16 refers).**

Below - Audit Table 16 – incorporating Performance Indicators 60 to 61

	Source	Criteria	Means of Verification	Compliance Status
60	No documented policy	The State Director of Education and/or his designee shall ensure that testing programs used in the schools are culturally appropriate and applicable to the needs of a developing society. Designee: Instruction and Curriculum, Testing Specialist	Criteria for evaluation of testing programs Report on appropriateness of testing programs	Compliance There are no organizational policies and procedures relating to testing programs, however the Testing specialist has developed 'testing guidelines'. Kosrae State Testing (KAT) are prepared to compliment NST developed by the NDOE. KAT tests are designed to evaluate locally developed curriculum. Volunteers with WTP also administer weekly subject tests to evaluate appropriateness in materials and gauge student learning. Reports are prepared each year on KAT, however non were provided for 2009.
61	No documented policy	The Testing Specialists will: 1. Review for: a. Cultural appropriateness. b. Student's needs. c. Applicability to Kosraean society. d. Reliability and validity. 2. Recommend changes in test use or type of test. 3. Take action.	Report on recent review of test	Partial compliance The testing specialist are actively involved in administering the NST and the development and administering of the KAT. Guidelines for testing include development of test materials, preparation for Test Administration and Testing Administration. However, no evidence supports cultural appropriateness and applicability to Kosraean society in the development of tests. Review is built into the testing guidelines but no report highlights actual review methodology not outcomes of review. No testing report was available for 2009

State Scholarship and Loan Fund

The activities of the Board for the State Scholarship and Loan Fund are outlined in the Kosrae SCL. Procedural requirements for the application, assessment and selection of recipients are followed in accordance with the Student Scholarship, Grant and Loan Regulations.

Reports are furnished to twice yearly (July and December) to the Governor and the Speaker, in accordance with legislative provisions.

Below - Audit Table 17 – incorporating Performance Indicators 62 to 64

	Source	Criteria	Means of Verification	Compliance Status
62	Student Scholarship, Grant and Loan Regulations Part 3. §3.1	Scholarships, grants and loan shall only be to a student who: a. is domiciliary of Kosrae b. In need of the amount of scholarship, grant or loan to pursue a course of study on a full time basis as an undergraduate, graduate or professional student at an institute of higher education c. Has been accepted for enrolment at an institute of higher education d. Has a cumulative grade point average of 2.5 or above	Documented Criteria used to qualify students	Compliance Scholarships, grants and loans are allocated by the Scholarship and Loan Committee in accordance with the provisions outlined in regulations and guidelines.
63	Student Scholarship, Grant and Loan Regulations Part 4. §4.1	The Scholarship Board shall select recipients of scholarships, grants and loans based on the cumulative GPA, field of study, year in the institution and the amount of financial need	Selection Criteria	Compliance From the guidelines and application forms provided by the Scholarship Committee, the stated regulatory qualifications for eligibility for scholarships, grants or loans are fulfilled in the selection of recipients.
64	Kosrae State Code of Laws Title 7 Chapter 10 §1003 (5)	The Board reports in writing to the Governor and the Speaker no later than the first day of June and December of each	Copies of reports forwarded to Governor	Compliance Reports are furnished by the Board in accordance with regulatory provisions

	<p>year regarding an accounting statement that includes:</p> <ul style="list-style-type: none"> (a) all sources and amounts of funding or income; (b) all scholarships awarded; (c) all office related expenses and expenditures; and (d) a list of all current and past scholarship recipients, the scholarship amount awarded, school they attend or have attended and past due balances. 		
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Summary of compliance determinations			
Category 2: Pedagogy			
Not determined	Compliance	Partial Compliance	Non Compliance
0	7	4	5

SECTION THREE: CATEGORY 3 – ADMINISTRATION COMPLIANCE

Administration Compliance – State Education Advisory Board

This criteria can not be evaluated at this time as the State Education Advisory Board has only been recently established. The two meetings held so far have focused on Board members developing the operating and administrative parameters of the Board. As such, no reports have been called for or provided yet by the Director.

Below - Audit Table 18 – incorporating Performance Indicator 65

	Source	Criteria	Means of Verification	Compliance Status
65	Kosrae State Code of Laws Title 7 Chapter 7 §7.704 (1)	The Board shall receive monthly updates from the Director on. (a) Reported expenditures in the district. (b) Results of any department audits; (c) District staffing levels. (d) Results and analysis of State Academic exercises such as the NST tests; (e) Proposed curriculum changes; and (f) Any changes, or proposed changes to State educational policies and goals	Reports received from Director	This criterion can not be measured as the State Education Advisory Board has only recently been established and has not started to receive reports for the Director yet.

Scholarship Board

Administrative duties for the Scholarship Board are provided by a co-ordinator on a part time basis. All requirements of the Board are laid out in legislative provisions are being fulfilled.

Below - Audit Table 19 – incorporating Performance Indicators 66 to 68

	Source	Criteria	Means of Verification	Compliance Status
66	Kosrae State Code of Laws Title 7 Chapter 10 §7.1004	The Board shall hire a full-time Administrator who shall be responsible to the Board to execute its programs. The Board appoints the Administrator and fixes his compensation.	Administrator Appointed	Partial Compliance An administrative support assistant has been engaged. The administrator of the Board is the chair person.
67	Kosrae State Code of Laws Title 7 Chapter 10 §7.1005	The Administrator has the following duties and responsibilities: (1) To coordinate the awarding of grants and loans for post-secondary education; (2) To advise the Board on applicants' eligibility for post-secondary grants and loans; (3) To communicate with colleges and universities on behalf of students; (4) To maintain Scholarship Board records, including financial and academic records of grant and loan recipients; (5) To maintain accounting records of all grants and loans awarded, all payments made and all amounts outstanding; (6) To ensure and pursue collection of loans when due, with the advice of the Office of the Attorney General; and (7) To fulfil such other administrative duties and	Roles and duties of administrator are documented	Compliance The Administrator performs all duties as outlined in legislative provisions.

		responsibilities as may be delegated by the Scholarship Board.		
68	Kosrae State Code of Laws Title 7 Chapter 10 §10.205	The Department of Education retains in a Yearbook Revolving Fund all monies contributed, received and collected from yearbook sales by depositing that revenue into the fund using it strictly for the Kosrae high School yearbook	Yearbook Revolving fund register maintained	This criterion can not be measured. While this current legislation does require the DOE to retain a Yearbook Revolving Fund, all revolving funds in Kosrae have been eliminated. School Yearbooks have not been sold for several years

Private Schools

Interaction with the sole Private School and the DOE in Kosrae is minimal and not formalized. No regular reporting is received from the Private school and the DOE does not provide any necessary oversight.

No Private School representative is included on the State Education Advisory Board. (This is currently being addressed).

It is recommended that the State Education Advisory Board include a representative of the Private School. (**Recommendation 17 refers**). It is also recommended that a formalized structure of meetings, oversight and reporting is established between the DOE and the Private School (**Recommendation 18 refers**).

Below - Audit Table 20 – incorporating Performance Indicators 69 to 71

	Source	Criteria	Means of Verification	Compliance Status
69	FSMC, Title 40. Education Chapter 1 §109. Private schools.	Any person or persons desiring to establish and operate a private school, including a school with a religious affiliation, within the Federated States of Micronesia shall, prior to the establishment thereof, make written application for a charter to the Secretary. The application shall be signed by the applicant or applicants and reviewed by the State Director of Education and the State Board of Education of the State in which the school is to be located. Upon receipt and approval of the application by the Secretary, the Secretary shall issue to the person or persons applying therefore a charter for up to 15 years duration in the form of a mutual agreement between the chartered school and the FSM, authorizing the establishment of	Copies of Annual license applications from private schools	Partial Compliance The Seventh Day Adventist School in Tafunsak has been granted a license to operate. However, there has not been an annual license issued as there has been no report for DOE stating whether or not the school is operating consistent with the terms of its charter and other applicable regulations

		the school, and an annual license to operate the school, renewable by the Secretary upon a finding by the State Director of Education that the school is operating consistent with the terms of its charter and other applicable regulations.		
70	Kosrae State Code of Laws Chapter 7 §7.701 (1)	There is to be established an Education Advisory Board consisting of 8 voting members representing each elementary school, the High school and one representing private schools	A representative of a private school is on Education Advisory Board	Non compliance There is currently no private school representative on the State Education Advisory Board, however this is being addressed by the Advisory Board and the Governor.
71	Kosrae State Code of Laws Title 12 Chapter 12 §12.202	A private school is subject to the oversight of the Department of Education and complies with the Department's regulations regarding personal hygiene and structural safety. The Department may require a private school to submit regular reports of attendance and other matters of public concern. Failure to comply with law or regulation subjects an offending private school to revocation or suspension of its charter.	Reports submitted by Private schools	Non compliance No regular or formalized oversight is provided by DOE of the Private School in Kosrae State. No regular reports are furnished by the private school in accordance with legislative requirements.

Hiring of Special Instructors

The process for hiring special instructors is not governed by documented policy or procedures. In the case of hiring special instructors for the Cultural Education Program, a special community working group was established to assist in the identification of the program content and development of curriculum. Obviously, the 67 community persons selected as special instructors were selected on the basis of the educational and skills needs of the program. However, in the absence of policy, the process therefore can not be viewed as open and accountable and ensuring that the most qualified and skilled persons were selected. The actual selection process was not able to be explained to the auditor.

It is recommended that the selection and hiring of special instructors is guided by the development of policy and procedures. (**Recommendation 19 refers**) Additionally, it is recommended that there is development of policy and procedures manual for a range of operational and administrative matters across the entire Department)

Below - Audit Table 21 – incorporating Performance Indicator 72

	Source	Criteria	Means of Verification	Compliance Status
72	No documented policy	The Principal/Head Teacher may recommend a person for special instructor for cultural heritage and traditional skills programs in the following manner: 1. Describe the program and needed skills. 2. Describe the applicant's skills and background. 3. Provide a lesson plan 4. Describe the manner of instruction. 5. Length of the course/program. 6. Estimate cost of program. These shall be submitted to the State Director of Education at the earliest possible date, but not later than one month before the expected hiring date. The State Director of Education will take action and issue a certificate of special-instructor status.	Process for selection of persons for special cultural heritage and traditional skills programs	Partial Compliance No documented policy or procedures addresses the hiring of special instructions, as in the case of cultural instructors. For the Cultural Education Program, a Community Working Group was established to advise of curriculum development. Eventually, 67, community persons were hired to deliver the cultural instruction, however, the selection process to identify and select instructors has not been reported on or documented to the Director. All other requirements as listed in this criteria have been fulfilled.

Fiscal Planning and Accounting Systems

The FSM NDOE shows annual per capita spending per student enrolled on its websites of JEMCO education indicators

It is important to state early in the narrative section of these criteria, that the DOE is in compliance with the procedures set down by the State Department of Finance and the requirements of the FMR. No evidence was uncovered by the auditor of wilful malpractice or mis-management of funds. Processes and systems have been established and followed. In fact, the Director and the Department of Finance have strengthened processes to ensure misuse of funding does not occur. Property management processes have been established by the relevant Property and Procurement officer and appear to be effective and efficient. However, the absence of documented policy and procedures means that the knowledge of the processes and systems is a significant risk of loss if and when the relevant officer retires or moves to another field of duties. Knowledge and understanding of the processes is only really clearly within the purvey of the relevant officer. Others who may be called upon to perform those duties in the future are either exposed to a steep learning curve or may need to institute their own processes.

Not only would documented policy and procedures reinforce FMR provisions, such procedural processes provide consistency, quality assurance, openness and accountability to the financial and budgetary processes.

As acknowledged in criterion 80, the DOE Budget Officer retains the relevant data on finances and budgetary expenses. A major role for detailed recording of budgets and expenditure is to inform on financial status of the department, so that informed decisions can be made when unforeseen circumstances occur. There is some unstructured reporting and advice given to the Director, but this is generally when he makes a request for information from the Budget officer. It should be a matter of general course that regular budget advice briefings are provided to the Director. Without regular structured and formalized reporting processes, it is difficult to accept that the Director is fully informed at all times on the situation of the department’s budget. It is recommended that documented policy and procedures – designed to compliment and reinforce FMR provisions – are developed by the DOE. (**Recommendation 20 refers**). It is also recommended that a systematic budgetary reporting regime is instituted so as to regularly inform the Director on financial status of the Department. (**Recommendation 21 refers**).

Below - Audit Table 22 – incorporating Performance Indicators 73 to 81

	Source	Criteria	Means of Verification	Compliance Status
73	Financial Management Regulations Part 1 §1.4(i)	Financial obligation is for salaries, wages, contractual services, contracts entered into for the purchase or lease of supplies, personal property, construction, real property and loans or other	Extend of reporting on financial obligation	Compliance As outlined and provided for in the FMR, departmental obligations rest with the key budgetary line items. Budgets are prepared by DOE in accordance with those budgetary

		commitments requiring the payment of funds.		obligations
74	Financial Management Regulations	The State Director of Education shall institute a procedure for budget planning.	Budget planning procedure established	Partial Compliance A budgetary planning and submission procedure has been instituted and is followed. The department's procedure is strictly followed and such procedure aligns with the provisions outlined in the Regulations. Additionally, the procedure adopted by the department is suitable to the State Department of Finance. However, while there is compliance with Department of Finance processes and the DOE follows FMR procedures, no internal policy or procedures have been developed to reinforce FMR provisions. <u>It is for this reason only, that partial compliance is assessed.</u>
75	No documented policy	Before the second quarter of the fiscal year, the State Director of Education and assigned staff will draft a tentative budget for the next fiscal year. The basis of this draft is: 1. Assessed needs of students. 2. Availability of funding.	Last draft budget reports produced	Compliance While no documented policy exists, the State Department of Finance specifies the budgetary submission process. Draft budgets are prepared in strict compliance with the State Department of Finance requirements
76	No Documented policy	The State Director of Education and/or his/her designee shall have full and final authority for control of the budget as authorized by the Governor and the State Legislature. Designee: Budget and Supply	Accountability measures established and documented	Partial Compliance The Director does have responsibility over the budget and final control on budget requisitions, however full authority seems to rest with the Department of Finance, the Governor's Office and the Legislature. IT appears that the budget is subject to some degree of

				access and control beyond the Director, thereby questioning his full and final responsibility, control and authority.
77	No documented policy	The State Director of Education or his designee will review all financial expenditures to ensure accepted fiscal practices.	Expenditure sheets produced for review	Compliance The Director has initiated a tiered level of oversight on budgetary and expense issues. While, again, not documented, the process is strictly followed by all relevant personnel. Principals, Budgetary office and property and procurement officer have oversight before final review is conducted by the Director. Externally, the Department of Finance exercise further review.
78	No documented policy	The State Director of Education and/or his designee shall maintain all necessary planning information and budgetary records as needed to ensure proper system operation. Designee: Budget and Supply	System established	Compliance Budgetary and expense records are maintained by the DOE. However, there are multiple records retained by various stakeholders in accordance with their specific tasks. For example, the Property and Procurement Officer maintains expenditure information. However, there appears to be no linkages between the various record holders and variations may occur. Information relating to budget changes made from central office may not cascade to a school level. While central records may accurately reflect the respective changes to budget, school records may not and confusion on actual budget can occur between functional areas. The Budget officer also advised that it is necessary to re-adjust DOE records with Department of Finance

				records due to discrepancies which occur during the financial year.
79	Financial Management Regulations. Part 1	The State's Educational-financial accounting system shall follow basic public accounting concepts and procedures and the requirements set out in the Financial Management Regulations	Level of compliance with FMR	Compliance The DOE accounting system aligns with the requirements of the FMR and the State Department of Finance.
80	No documented policy	The State Educational Budget Office will at a minimum perform the following: 1. Record every financial transaction. 2. Record all monies received as to: a. Type b. Source 3. Record all monies expended as to: a. Type b. Source 4. Establish line-item codes for control and accountability. 5. Submit quarterly-financial reports to the State Director of Education. 6. Provide data for: a. Cost-benefit studies b. Line modifications	Details recorded and maintained by budgetary office	Partial Compliance The DOE Budget office retains budget details in accordance with this criteria. While there is some ad hoc reporting to the Director, it was established that there is no regular formalized reporting system to inform the Director on budget status. For this reason only, this criterion is assessed as partial compliance.
81	No documented policy	The State Director of Education shall designate department heads and other such personnel as necessary as having budgetary responsibility.	Roles of person responsible	Compliance The Director has appointed relevant personnel to have budgetary responsibility within the department. There is a budget officer who assists in the preparation and co-ordination of Annual budgets and to also monitor expenditure. Oversight and other actual expense budgets are managed, in

				coordination with the Budget Officer by a property and procurement officer. Principals at schools have been nominated to prepare budget submissions.
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Recruitment

The responsibility for recruitment rests with the Division of Personnel in the Department of Administration. The audit inspection found there is close liaison with between the Director DOE and the Department of Administration personnel during the recruitment of any personnel.

In cases where the Director seeks to contract specialist services, a strict procedure is followed which includes advice from Department of Administration and the Attorney General's office.

All detailed personnel records are maintained by the Division of Personnel. The position descriptions for employees of the DOE are maintained by that Division. Discussions with the Division resulted in a review of ALL position descriptions (relating to DOE) which are held by the Division. As nearly all new recruitments are undertaken by contract, copies of the position descriptions are attached to each contract.

The capacity of current position descriptions to inform a newly recruited employee to the DOE is questionable. Firstly, very standard and broad PDs are maintained. It appears that the currently used PDs are extremely out of date and may not reflect the duties and functions actually required of an employee. It is recommended that all PDs are reviewed for accuracy and relevance to current duties performed (**Recommendation 22 refers**).

In addition to not being applicable to contemporary positions, the range and breath of information in PDs is limited. Given the diversity of jobs performed within the DOE, very few individual PDs appear to be held by Division of Personnel. When a request was made to Division of Personnel staff for all different PDs relevant for Education, only the following documents were located and handed over:

- Class specifications for Classroom Teachers, Counsellors and Principals (Class means employment class –not DOE student classes) – this list contains employment class descriptions for 1. Teacher Aide, Standard Teaches, Counsellors, Vic Principals, Principals.
- (Employment) Class specifications for Clerk Typist - Class 3 to 5)
- (Employment) Class specifications for School Secretary - Class 6 to 7)
- (Employment) Class specifications for Education Specialist (Curriculum - Class 12 to 14)
- (Employment) Class specifications for Administration Officer - Class 9 to 16)
- Job Description for Administrator for Facilities and Support Services

Firstly, the contents of these documents were so broad that they were almost meaningless in describing the actual duties and functions to be provided by the new employee. They do not in the slightest inform the employee on what their job requires them to do effectively. The PDs and class specifications do not guide the employee in a manner to competently perform the job. Therefore, the relevance of the documents to the actual positions is limited (at best) and worthless (at worst). Poorly developed PDs also inhibit the ability to manage performance of the employee against any accepted and recognised criteria.

PDs currently used only outline the following:

- Duty summary
- Key duties and responsibilities
- Qualification requirements

PDs lack quantifiable outputs and goals.

It is suggested that appropriate job descriptions (PDs) should also express the following:

- Position / Title
- Class or Grading for employment
- Work division or unit
- Effective date
- Primary purpose of the role
- Position Dimension
- Reporting relationships
- Organizational Environment description
- Principal accountabilities
- Selection Criteria
- Qualifications

Secondly, the organizational structure of the DOE indicated a vast array of different functions performed by many DOE employees. For example, of the specialist areas within the department, the audit inspection was only able to obtain a 'Class specification' for Educational Specialist – Curriculum. Given the diversity of programs being implemented within the DOE, testing, program coordinators in Special education, budget officers, Cultural Skills Program, Testing Specialists, Early Childhood Education, SMD Supervisor, Professional Standards Officer – just to name a few, no individual PDs for those positions were provided. Each of the persons interviewed as part of this audit were questioned regarding knowledge of their position descriptions. In almost all cases, no employee knew the contents or requirements of their PD and had never seen or been provided a copy of their PD. (Note, this does not include recent contract employees as a copy of the PD is attached – mainly for teachers).

In the standard Teacher employment Class specifications, the division between descriptions is only 'elementary school teachers' and 'high school teachers'.

While the employment Class specifications outline 4 separate classes of 'counsellor', there were no PDs provided for the vast array of other positions found within schools, for example Librarian, Special is subject teaches, Special education teachers, Vocational coordinator, school nurse, technician.

Other employee positions exist within the DOE and no PDs were provided for them, for example, bus driver, cleaner, Community specialist, Office Mechanical supervisor, Carpenter.

It is recommended that a job analysis is conducted by a HR specialist to identify and define all various (individual) positions within the DOE and prepare detailed (job specific) job / position descriptions. (**Recommendation 23 refers**).

Below - Audit Table 23 – incorporating Performance Indicators 82 to 84

	Source	Criteria	Means of Verification	Compliance Status
82	Public Service Regulations Part 2 §2.1	The State Director of Education, in its hiring policy, will coordinate all recruitment, announcements of examination, and other matters through the Division of Personnel, Department of Administrative Services.	Procedure followed for last 3 recruitments	Compliance The responsibility for hiring policy rests with Division of Personnel in Department of administration. The procedures followed during the recruitment process comply with the Department of Administration Manual and the requirements of law. The Director coordinates all recruitments in liaison with Division of Personnel staff.
83	Public Service System Regulations Part 2 §2.1	Examination Announcements. As vacancies occur or are anticipated, examinations for recruitment shall be announced and posted in the Personnel Office, and shall be given the widest publicity justified by the vacancy.	Last 3 examination announcements	Compliance Examination announcements are posted in the Personnel Office and are given widest public publication
84	No documented Policy	When making assignments, giving consideration to the mission of the organization and structuring positions for accomplishment of requirements in the most effective and economical manner possible.	Criteria for making assignments	Partial Compliance No documented policy exists on making assignments. It is for this reason that 'partial compliance' has been assessed by this audit inspection. While it appears that consideration is given to the needs of the organization and the structuring requirements, the criteria for making assignments needs to be developed to ensure consistency in this area in the future.

Personnel Performance Evaluation

Performance evaluation of employees is a function which has devolved to a school level. Individual Principals are responsible for conducting evaluations and completing performance evaluation forms. Copies of forms are retained at schools AND copies are retained at DOE Central office to allow coordination across the organization.

There is no formalized internal DOE policy and procedures for evaluation, with the exception of a standardized performance evaluation form. In the absence of policy and procedures, the approach taken across the organizations in the various functional areas and schools varies considerably. While this approach has allowed a closer relationship between levels conducting the evaluation and being evaluated, central guidance (through documented policy) is still necessary to provide organizational oversight and consistency. The local level evaluation means a more accurate reflection of actual performance.

It was noted that some schools conduct performance evaluation once a year, others twice, depending on the relevant Principal. Also, observation evaluation is popular approach undertaken by Principals. The number of times formal observation is undertaken varies from 2 time a year to 5, again depending on the school.

Performance evaluation processes generally (in the case of teachers) assess the following domains:

- Planning and preparation
- Instruction
- Learning Environment
- Parental Interactions
- Contributions towards accomplishing goals and priorities
- Professional learning and growth
- Performance of routine professional obligations

There is no evaluation against actual job duties as defined in PDs (refer to Recommendation 23) as job descriptions are poorly defined. Performance evaluation does not explore areas of personal development and skill capacity in vital facets of teaching.

The audit believes that performance evaluation processes should be linked to the professional standards policies developed by the organization. In that way, observations with regards to poor performance may be linked to an employee's conduct records whereby poor conduct (amounting to neglect of duty) can be investigated as a disciplinary issue. Additionally, performance records can assist the Director in the application of sanctions during disciplinary proceedings. For example, if minor complaints are dealt with by way of the disciplinary process, the employee's performance can be taken into consideration in the application of sanctions. Further, a properly completed performance evaluation form may assist in determining the cause of an employee's conduct during a disciplinary investigation or hearing, such as, if neglect to attend to duties is the matter under investigation, a proper evaluation report may indicate deficiencies in skills and knowledge and thereby identify the cause of the suspected negligent conduct.

It is recommended that a HR specialist also review the adequacy of performance evaluation forms with the view of determining the efficacy of such forms in truly monitoring and evaluation performance. (**Recommendation 24 refers**)

Below - Audit Table 24 – incorporating Performance Indicators 85 to 88

	Source	Criteria	Means of Verification	Compliance Status
85	Kosrae State Code of Laws Title 18 Chapter 2 §18.202	The Director of Education shall utilize the performance evaluations for employees within the Department and transmit them to the Director of Administration for administrative purposes	Personnel evaluation forms from Elementary, secondary schools and DOE corporate office	Compliance Performance evaluation as completed through completion of evaluation forms either once or twice yearly in addition to observation evaluation ranging from 2 to 5 times a year.
86	No documented policy	All employees will undergo evaluation of their duties and responsibilities which will include as a minimum: 1. Compliance with job description or contract.	Personnel evaluation forms from Elementary, secondary schools and DOE corporate office	Compliance There is no documented policy or procedures in relation to performance evaluation. As a result, the approach is extremely varied. Performance evaluation is conducted at a school level. Some schools complete forms once a year, others twice, depending on the relevant Principal. Also, Observation evaluation is popular approach undertaken by Principals. The number of times formal observation is undertaken varies from 2 time a year to 5, again depending on the school.
87	Performance Evaluation Form	The performance evaluation system is designated primarily for the purpose of appraising each employee how well he is discharging his duties and	Areas assessed as outlined in Performance evaluation sheet	Partial Compliance While there is a standardized performance evaluation form used for appraising each employees attendance to duties, the form does

		<p>responsibilities, and of indicating where in his performance he could be more effective in the application of his knowledge, skill, and abilities. It provides a means for letting the employee know where he stands with the organization.</p>		<p>not indicate areas of knowledge and skill development nor where the employee stands within the organization. Additionally, some schools have adopted their own performance evaluation form, meaning consistency across the department is compromised.</p>
88		<p>9.6 Impact of ratings. Annual written performance ratings are the basis for granting or withholding annual step increases. Employees rated "Satisfactory" or "Exceptional" shall be eligible for a step increase within their pay level. Those rated "Less than Satisfactory" shall not be eligible for a step increase, provided that if the employee concerned brings his performance up to standards, he then shall be eligible for a step increase within his pay level, but such increase shall not be changed accordingly. Annual written performance ratings serve also as one factor in selection for promotion, in determining retention status in cases of RIF, for reviewing justification for authorizing a merit increase, and in adverse actions and may be a consideration when evaluating a Superior Performance Award request.</p>	<p>Ratings scale established and effectiveness of scale to measure performance</p>	<p>Compliance The standard DOE Performance evaluation form and the individually developed performance evaluation forms at some schools rate in accordance with the satisfactory and exceptional levels. The current performance evaluation form has the ability to link with the current contracts for each teacher regarding discipline and termination.</p>

Penalty Sanctions

The action the Director may take in dealing with disciplinary action is governed by the Provisions of the Kosrae *State Unified Public Service System Regulations*. The Director developed a Professional Standards Manual and implemented a streamlined disciplinary process regarding the investigation of breaches of Codes of Conduct. Each employee was provided a copy of an Employee's Professional Conduct Handbook which summaries the disciplinary and penalty sanctions.

The Standard Teachers Contract outlines a range of disciplinary sanctions (particularly relating to termination or failure to renew contracts – Clause 13).

While the Contract does refer to compliance of standards, laws, regulations, etc (in Clause 16), specific reference is not made to the provisions of the Professional Standards Manual. It is recommended that all such teacher and employee contracts should be amended to specifically draw the employee/contractors attention to the range of penalty sanctions outlined in the Professional Standards Manual. (**Recommendation 25 refers**)

Below - Audit Table 25 – incorporating Performance Indicator 89

	Source	Criteria	Means of Verification	Compliance Status
89	Individual Contracts Professional Standards Manual (Paragraph 1.9 Categories of Misconduct and Disciplinary Action)	The Director may determine appropriate action regarding failure to comply with performance provisions of a Contract through either	Contracts outlining penalty sanctions Code of Conduct outlining penalty provisions Handbook for all staff outlines penalty provisions	Compliance Standard Teach Contract provides a range of required standards of conduct. Clause 13 indicates termination through 'failure to maintain satisfactory levels of performance. Professional Standards Manual outlines all penalty sanctions and application through disciplinary process. Employee handbook provided to all personnel which briefly outlines disciplinary Sanctions

Professional Standards

In 2008, the Director DOE developed and implemented the Kosrae DOE Professional Standards Project. The cornerstone of this project involved the establishment of a dedicated officer to investigate breaches of discipline and to over-see the maintenance of professional standards.

A key outcome of the project was a streamlining and simplifying of the disciplinary process. Prior to the implementation of the new disciplinary processes, most disciplinary actions taken under the Public Service System Regulations were later overturned on appeal by the subject employee, due to failure of the organization to strictly adhere to due process in accordance with the provisions of the Regulations.

The Professional Standards Manual has resulted in no disputed appeals subsequent to the introduction of the new Professional Conduct process.

Below - Audit Table 26 – incorporating Performance Indicators 90 to 95

	Source	Criteria	Means of Verification	Compliance Status
90	Professional Standards Manual Strategic Plan 2008 – 2012 (Strategic Goal 4.4)	A Professional Standards Manual which addresses all aspects of Discipline, Ethical behaviour and Codes of Conduct is developed.	A detailed Manual of professional standards is developed and address all relevant aspects of discipline and professional conduct	Compliance The Professional Standards Manual has been developed and addresses all issues relating to Discipline, Ethical behaviour, Codes of Conduct and Professional Standards.
91	Professional Standards Manual Strategic Plan 2008 – 2012 (Strategic Goal 4.4)	A formalised Code of Ethics is adopted	A code of Ethics is developed and inculcated into organizational culture	Compliance The DOE has adopted and communicated to all personnel a Code of Ethics (Adopted from the Code of Ethics developed by the U.S. National Education Association)
92	Professional Standards Manual	The position of Professional Standards Officer is established to overview, monitor, investigate and report on Discipline and codes of professional behaviour	The establishment of dedicated and skilled personnel to perform the role of over-sighting discipline and professional conduct	Compliance A Professional Standards Officer has been appointed to over-sight all disciplinary investigations and maintenance of professional conduct
93	Professional Standards Manual	Codes of Professional behaviour and conducted are identified, developed and implemented	Standards are identified and communicated to all personnel	Compliance As part of the Professional Standards Project in 2008, training

				provided to all employees. Copies of the Employee's Professional Conduct Handbook, provided to each employee
94	Professional Standards Manual	All breaches of discipline or professional conduct are fully investigated, reported and dealt with in a manner according to local statutory provisions	A process for investigation, reporting and hearing of breaches of discipline is developed and adopted.	Compliance A disciplinary reporting, recording and investigation process developed which streamlines Regulatory requirements
95	Professional Standards Manual	A streamlined process of complaint making and reporting templates are developed	A complaint making process is developed and incorporated within the discipline process. Reporting templates (are developed) which streamline current statutory requirements.	Compliance Reporting framework developed to streamline investigative and disciplinary action processes.

School Administration, Policy and Procedures

The standards of maintenance of facilities and supervision of personnel varied from school to school. There was no standardization of standards through any form of organizational policy and procedures.

The DOE is moving away from a ‘centralized management base’ to a ‘school based management regime’. While this approach appears to be beneficial in devolving great autonomy to a school level, consistency in policy and procedures still need to exist in order to support and guide local level efforts.

Each school is required to possess a School Handbook which is essentially local level policies. During the Audit inspections, not all schools were able to produce such documents and in some instances, handbooks were severely out of date and in need of review.

It is recommended that DOE develop and adopt organizational policies and procedures which will also guide the development of localised school based policy manuals. **(Recommendation 26 refers)**

Below - Audit Table 27 – incorporating Performance Indicator 96

	Source	Criteria	Means of Verification	Compliance Status
96	No documented policy	Each school building shall be maintained, and staff supervised by a Principal/Head Teacher as assigned by the State Director of Education. The Principal/Head Teacher shall be supervised by the State Director of Education or his designee. The Principal/Head Teacher shall ensure that all programs, projects, instructional units, facilities, and staffing of the school be in accordance with the policy and procedures of the Department of Education as directed by the DOE Administration.	DOE Annual report on School administration	Partial Compliance No documented DOE policy relates to this criteria. Most school buildings and facilities are maintained to the best possible level by Principals. While staff are supervised by Principals and in turn Principals are supervised by the State Director, projects, projects , instructional units and facilities are managed in accordance with individual Principal’s standards as opposed to any consistent DOE policy and procedures.

Employee Regulations for assignment, transfer, leave and paid positions

Focus group workshops and individual interviews indicated general acceptance of compliance with PSS provisions relating to assignments, transfers, leave and paid positions. However, no documented records or evidence were presented to verify current accepted approaches.

In relation to determining factors and considerations for transfer assignments, the 4 key factors in this criterion appears to be the basis for all transfers. However, no documented policies or procedures were presented to support actions taken.

It appeared to be universally recognized of the need for a family member not to have responsibility or direct control over another in the workplace. However, again, no documented policy exists to guide staffing arrangements.

It is recommended that issues identified in this criteria need to be supported with documented policy and procedures. **(Recommendation 27 refers)**.

Below - Audit Table 28 – incorporating Performance Indicators 97 to 99

	Source	Criteria	Means of Verification	Compliance Status
97	Public Service System Regulations Individual Staff contracts	The provisions of the PSS are complied with relating to assignments, transfers, leave and paid positions	Data and records on assignments, etc	Partial Compliance While data exists on current assignments of personnel, no documented evidence was provided on past assignments. It would appear that provisions in the Public Service System and individual contracts are complied with in relation to assignments, transfers, leave and paid positions.
98	No documented policy	In determining transfer assignments, the State Director of Education and the Administrative Staff will take into consideration: 1. Employee's present duties. 2. Employee's present location. 3. Supervisor's recommendations. 4. Employee's input.	Data and records	Partial Compliance During interviews, the audit inspector was advised of the determinant for transfer assignments. While the main key points are taken into consideration, no documented evidence to support was produced.

99	No documented policy	The State Director of Education and Principal/Head Teacher will review all employees to ensure that no family member has responsibility over another. As necessary, reassignment of family members may occur upon the recommendation of the Principal/Head Teacher to the State Director of Education.	Procedures established	<p>Partial Compliance</p> <p>Interviews with Principals indicated that no family member has responsibility over another, however no formalized policy or procedures exist.</p>
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Supplies, Equipment and Vehicles

The DOE has established a fairly rigorous regime relating to supplies, and equipment. Central office maintained a detailed list of all property and equipment purchases and retention. Twice yearly inspections are conducted of school property and equipment by the Property and Procurement officer.

Schools also retain their own copies of property and equipment lists (drawn from Central Office) and some additionally conduct their own inspections prior to central office inspections. All DOE property observed during the audit was Government tagged.

Below - Audit Table 29 – incorporating Performance Indicators 100 to 105

	Source	Criteria	Means of Verification	Compliance Status
100	Financial Management Regulations	The DOE Administration through Budget and supply shall coordinate the purchase of all supplies and equipment in State programs.	Processes established	Compliance Processes, while not documented internally within the department do comply with FMR and Department of Finance requirements.
101	Financial Management Regulations Part 5 §5.2	All equipment will be identified by affixing a property tag	Extent of tagging of property	Compliance All DOE property is tagged.
102	No documented policy	DOE will conduct biannual inventories. Inventories are done by matching the education ID number to the inventory list. New items will be labelled and added to the master and local school-inventory list as soon as the item is in use. These lists will be kept in the master-inventory list in the Budget and Supply office, and the school inventory list will be kept in the Principal's/Head Teacher's office. Inventories will be scheduled by the State Director of Education.	Inventory reports	Compliance Twice yearly audit inspections are conducted by the Property and Procurement Officer. A master inventory list is retained in central office. Some schools also conduct their own audits and check off against inventory lists provided from central
103	Financial Management Regulations	In all instances whereby the state enters into any contract, employs any person, firm, or corporation,	Contract processes	Compliance The FMR policy is attached to contracts.

		or undertakes any obligation which utilizes outside monies, i.e., special funds, such agreements will be made with the understanding that the State's liability is limited to the actual cost of the agreement. The State Director of Education will attach a copy of this policy as applicable to all contracts prior to signing. The signing of the contact implies the understanding of the policy terms by both parties.		
104	Financial Management Regulations Part 5 §5.5	The Director of Education shall maintain current fixed asset lists	Established asset list	Compliance Fixed asset lists are maintained and monitored
105	Financial Management Regulations Part 5 §5.6	A physical inventory should be conducted every 2 years.	Inventory reports	Compliance The FMR requires physical inventory inspections every two years. The DOE conduct these twice yearly.

Summary of compliance determinations			
Category 3: Administration			
Not determined	Compliance	Partial Compliance	Non Compliance
2	25	12	2

Summary of compliance determinations			
TOTAL			
Not determined	Compliance	Partial Compliance	Non Compliance
6	53	33	13

CONCLUSION

The audit inspection found that no formalized policy or procedures manual existed for the Kosrae State DOE. The audit inspector was advised that a 'folder of directives' had been created many years previously, but no copy of that manual could not be located. (Note – the audit inspector had view the folder referred to a number of years ago and is of the opinion that it did not constituted a clearly defined policy and procedures manual).

The absence of a dedicated (and central point of reference) Departmental policy and procedures manual means that:

- Clear organizational position on specific administrative, organizational or operations issues is not stated for the benefit of employees
- Openness and accountability is inhibited through the lack of stated policy
- Quality assurance can not be guaranteed on duties performed as no organizational procedure is clearly communicated to employees
- Employees are performing tasks as they see appropriate and not necessarily in accordance with standards or expectations set down by government or the department
- There is no sustainability in performance of functions as the knowledge on process is generally known only to one person
- There is an increased risk of ambiguity and confusion through no clearly articulated policies and procedures
- Best practice in the delivery of educational services can not be communicated

While the audit inspection found compliance with generally accepted practice, the absence of a departmental policy and procedural manual challenged the ability of the audit inspector to identify the appropriate criteria and performance indicators. It was surprising to actually find high levels of compliance with process given that no or limited policies exist to guide employee's actions.

The audit inspection (through discussions with internal and external stakeholders) found that in recent years there has been a significant improvement in the operations of the DOE and the quality of services provided. As recent as 3 years ago, a number of classrooms at some Elementary schools had no furniture (desks and chairs). Students had to sit on the ground. Classrooms had limited resources to assist in creating a suitable learning environment.

Under the current executive leadership, the organization is experiencing a period of change management. Change can usually be disruptive to any organization, however, the audit inspection believes that there is a commitment evident from the leadership levels through to the teaching staff (operational service delivery levels) to enhance the overall performance of the DOE in its role of educating the youth of Kosrae State.

ATTACHMENTS

Attachment One – Table of Performance Criteria – used during this management audit.

Strategic Management Compliance				
	Mission, Goals and Policy			
1	Mission Statement	The State Educational Mission is “to provide a student-centered education system that develops the skills, knowledge and values of the youth and young adults of Kosrae to become responsible, productive and life-long learners and be competitive locally and globally.	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Partial compliance</p> <p>In state comparisons of student performance in national standardized tests, Kosrae is doing better compared to other states. Using the NST current scoring method, student scoring at advanced or proficient levels are low. Conversely, scoring at below basic are extremely high, in some cases at 75%. (Note Kosrae uses an alternative scoring method which identified benchmarks)</p> <p>On Comet, Kosrae high school scores are above average, ahead of PICS, Yap and Chuuk, but still below the score of 700 associated with entrance into an associate degree program. (Note - Kosrae DOE is currently paying student costs in relation to sitting for the TOEFL and SAT tests which give are intended to give a clear picture of how ‘college ready’ students are. There is limited evidence of a ‘student centered’ approach to education, with the standard principally being ‘teacher centered’ style.</p> <p>Grade level equivalent score for</p>

				students entering Kosrae campus is 7 to 7.5.
2	Strategic Goal One and Objectives	<p>Enhance quality of teachers and support staff to promote student learning and achievement:</p> <ol style="list-style-type: none"> 5. By 2012, 20% of all teachers obtain BA/BS degree with a major in Education or core subject area he/she is teaching 6. Establish rigorous in service training for instructional and support staff and induction programs to new teachers 7. Establish and incentive program for high performing teachers and staff 8. Review and enhance the state scholarship program 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Compliance</p> <p>Currently, about 20% of teachers in the High School (including part time, contracted teachers and members of the WTP) have degrees. 10 teachers are enrolled in University programs. It is unlikely the 20% goal will be achieved by 2012 across the entire organization. <i>Note – the Director advises that the 20% with degrees listed in this objective was meant only to involve High School teachers.</i></p> <p>An ongoing and regular 'in service program' has not been instituted within the DOE, however, the Director instituted the K-Tec where in service summer conferencing is held. This commenced in 2009.</p> <p>An incentive and award program has been instituted. Teachers successfully completing the NST Teachers test receive a \$300 cash bonus. Teachers gaining an AA/AS receive a pay increase of \$1,000 annually.</p> <p>An independent review has only recently been commenced of the State scholarship program</p>
3	Strategic Goal Two and Objectives	<p>Increase parent / community involvement:</p> <ol style="list-style-type: none"> 3. Enhance parental and community involvement in educational decision making 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Partial compliance</p> <p>There has been some increased community involvement in the decision making processes through systematic PTA meetings with a</p>

		4. Inco-operation with local communities, establish Municipal Awards for both high performing students and parents		community member for each municipality being appointed to the Advisory Board. Municipal awards have not been established in a formalized manner.
4	Strategic Goal Three and Objectives	Provide for testing and program evaluation 3. Enhance the testing and assessment program to increase support for student learning and achievement 4. DOE will develop and implement a program evaluation system to ensure that all elements of the department support student learning	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	Compliance A new grading system and other enhancements of the testing and assessment program through benchmarks have been established. Instruction has been given to principals and support staff on formative assessment.
5	Strategic Goal Four and Objectives	Promote continuous improvement of the education system: 6. Improve technology and infrastructure and provide accessibility to all levels 7. Link planning, resource allocation and assessment 8. Improve communications at all levels /among stakeholders including students and teachers 9. Establish a code of ethics for the department 10. Enhance the Education Management Information System (EMIS)	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	Partial compliance All schools have internet access and there has been an increase in access to internet facilities by students. No Technology Plan has been developed as OIA have indicated they will fund an FSM wide Technology Plan. A comprehensive Webpage was developed There is local level involvement of linking resource needs to planning. A code of Ethics has been developed. EMIS is still centrally based and inputs approaches from a school level are antiquated.
6	Strategic Goal Five and Objectives	Enhance instructions and curriculum: 2. Provide learning-centeredness in all	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	Non compliance Move to a learning centered approach his not noticeably observable nor consistent across all

		classroom instructions and other instructional settings		schools. No evidence was produced to be able to measure this criteria.
7	Strategic Goal Six and Objectives	Provide appropriate learning environments and facilities: 3. DOE will develop and implement a facilities evaluation system to ensure that all schools meet a set standard before the beginning of each school year 4. Ensure that all schools will be equipped to provide Internet access to students, staff and the communities	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	Partial compliance Facilities in 3 locations have been significantly upgraded with new classrooms being constructed. Classrooms across most schools have witnessed appropriate resource improvements over last 3 years to achieve basic standard. All schools have internet access.
8	Kosrae State Constitution Article XII Section 1	The State Government shall promote education and health	Evidence of promoting quality educational services to the community	This criteria is too broad and non-specific so as not to be measurable. Though recent allocations to school facilities has recently been increased.
Responsibility and Authority of the State Director of Education				
9	Scope of Services in Director of Education Contract.	INSERT SCOPE OF SERVICES FROM CONTRACT The Governor assigns to the State Director of Education all responsibility and authority for the educational programs and administrative procedures of the Department of Education. Furthermore, the State Director of Education shall establish all necessary policy and procedures to ensure the day-to-day operations of the Department in accordance with the Federated States of Micronesia Codes and applicable state laws.	4. Duties performed by Director 5. Policies which support 'day-to-day' operations 6. Familiarity by staff of required policies and procedures	Partial Compliance The Director is fulfilling all requirements under his contract. However, the contract scope of services is broad and does not specifically outline all activities to be performed. While this Director is competently performing the tasks required to deliver educational programs, the contract is found to be 'wanting' in its description of roles and responsibilities. Additionally, Kosrae Statutes do not clearly outline all the roles and responsibilities required of a person in the position of Director DOE. No formalized policy and procedures

				manual was provided to the auditor and this area can not be measured.
Education System – Role of Administration of DOE				
10	Compact of Free Association Amendments of 2003 Agreement Concerning Procedures for Economic Assistance Article 11 (1) (a). P.144	The education sector Grant shall support and improve the educational system of the Federated States of Micronesia, including, without limitation, the systems for primary, secondary, and post-secondary education, respectively, and develop the human and material resources necessary for the Federated States of Micronesia to perform these services. Emphasis should be on advancing a quality basic education system according to performance standards appropriate for the Federated States of Micronesia, providing secondary education or vocational training to qualified students, improving management and accountability within the educational system, raising the level of staff quality, including teacher training, and improving the relevance of education to the needs of the economy.	<p>3. Sector grant funding is used to support and improve educational systems at primary, secondary and post secondary levels.</p> <p>4. Material resources have been developed to support educational systems with an emphasis on:</p> <ul style="list-style-type: none"> – Advancing basic education systems – Providing secondary education or vocational training to qualified students – Improving management and accountability – Raising level of staff skills – Improving relevance of education to needs of economy 	<p>Partial Compliance Sector grant funding is being used for the purpose of supporting educational systems.</p> <p>Materials and resources have been developed to support educational systems, however there is limited or no emphasis in areas such as raising staff skills levels and improving relevance of education to needs of economy.</p>
11	Kosrae State Code of Laws, Title 5 (The Executive), Chapter 2 (Organization) §5.202 (2)	The Department of Education shall (a) provide academic and vocational guidance for elementary and secondary education, giving special attention to handicapped minors;	Programs have been developed and are being implemented to fulfil the (5) requirements of the Code	<p>Partial Compliance As with the previous criteria, limited emphasis on teacher training nor providing academic and vocational guidance. The department does not appear to be administering and senior citizen or women’s affairs programs</p>

		<p>(b) conduct teacher training and evaluation;</p> <p>(c) develop relevant curriculum; and</p> <p>(d) provide career counseling services to students</p> <p>(e) administers youth, senior citizen and women's affairs programs, preserves and promotes traditions and cultural heritage</p>		<p>however funds some women's program when requests for funding are received. Senior citizens are utilised in the cultural skills program within DOE</p>
12	<p>Kosrae State Code of Laws, Title 12 Chapter 1 12.101</p>	<p>The school year for all schools consists of:</p> <ul style="list-style-type: none"> - no fewer than six hundred fifty hours of classroom instruction for first and second graders, - no fewer than eight hundred hours of classroom instruction for third graders and - no fewer than nine hundred hours of classroom instruction for fourth through twelfth graders. <p>The Director of the Department of Education establishes beginning and ending dates of the school year to suit Government school needs and customs.</p>	<p>3. That the level of instructions meets minimum requirements</p> <p>4. Start and ending dates align with educational and community expectations</p>	<p>Compliance School years comply with the instructional hours outlined in Kosrae SCL</p> <p>School start and ending dates are determined at a local level by Principals but are approved by the Director.</p>
Organization of the Department				
13	<p>Kosrae State Code of Laws, Title 5 (The Executive), Chapter 2 (Organization) §5.201 (3)</p>	<p>The Department of Education shall be composed of the Divisions of Instructional Services, Division of Curriculum Development and Evaluation and Division of Facilities and Special</p>	<p>Organizational structure of department</p>	<p>Compliance Kosrae State Legislature approved the combining of the Divisions of Instructional Services and Curriculum into one Division.</p>

		Services		
14	Resolution of State Legislature	The State Director of Education will, consistent with the requirements of State Legislature, develop a draft organizational chart showing: <ol style="list-style-type: none"> 5. Staffing patterns. 6. Departmental functions. 7. Lines of authority and responsibility. 8. Location of managerial personnel. 	Organizational chart reflecting structure outlined by Legislature	Non compliance The current organizational current does not show: <ol style="list-style-type: none"> 5. Staffing patterns. 6. Departmental functions. 7. Lines of authority and responsibility. 8. Location of managerial personnel.
	State Education Advisory Board			
15	Kosrae State Code of Laws Chapter 7 §7.701 (1)	There is to be established an Education Advisory Board consisting of 8 voting members representing each elementary school, the High school and one representing private schools	Membership representation on the Education Advisory Board fulfils statutory requirements	Non Compliance There is not currently any representative on the Advisory Board for private schools. Note this is being addressed. Also not, this is a matter for the Advisory Board and not DOE.
16	Kosrae State Code of Laws Title 7 Chapter 7 §7.701 (2)	The State Director of Education MAY serve as an ex-officio member of the Board	Level of representation by the Director of Education on the Board	Compliance The Director is an ex-officio member. The board has only met on two occasions since being created and at this time has focussed on Board structural issues.
17	Kosrae State Code of Laws Title 7 Chapter 7 §7.704 (2) (a) and (b)	The Board shall: <ol style="list-style-type: none"> (a) Provide advice and assistant to the Director to promote and establish a comprehensive education development plan consistent with the overall plans and objectives of the State Government. (b). Advise the Director on matters concerning educational policies and 	<ol style="list-style-type: none"> 4. Level of advice provided on the development of an educational development plan 5. Consistency of educational development with State Government objectives 6. Extent of advice provided to Director on educational policies and objectives 	This criterion can not be measured at this time as the Board has only recently been created and met on 2 occasions. The business of providing advice has not commenced as the Board is still establishing Board structural arrangements.

		objectives.		
	Employment practices			
18	Kosrae State Code of Laws Title 18 Chapter 1 §18.103	The State Public Service System shall be administered in accordance with the merit principles set forth below: (1) Equal opportunity for all regardless of sex, race, religion, political affiliation, ancestry or place of origin.	Analysis of employee qualifications by function. Analysis of data on employment rates with reference to race, sex, color, religion, age and national origin (e.g. breakdown of number of male/female Principals, male/female teachers and male/female employees at DOE.	Non Compliance The Kosrae DOE has adopted the minimum requirements set out in the National Teacher Certification Program. Thirty (30* – 15%) of teachers are assigned to teaching functions who do not meet the minimum standards. Of the 7 school facilities, only one of the Principal is female. This suggests that there is a gender bias in the selection of females to senior positions within the department. * The Director of DOE during interviews believes the number is far less and that only 6 persons do not meet minimum standards
19	Kosrae State Code of Laws Title 18 Chapter 3 §18.301	No teacher shall be employed by the Department of Education as a classroom practitioner unless the recruitment is by advertisement, for the period and by the media which are appropriate in the circumstances. The advertisement shall include at least the position title, the salary, a brief description of the class, the location of the vacancy or vacancies, the qualification standards required	3. Recruitment standards and processes 4. Details / information contained in advertisements	Compliance The requirements as outlined in Title 18 of KSCL are followed.
20	Kosrae State Code of Laws Title 12 Chapter 3 §12.301	The Director of the Department of Education may require certification of a teacher.	Number of teachers certified	Partial Compliance There is no evidence of a State certification, however, the National Teacher Certification is adopted. It

				was established that about 30 teachers do not meet the minimum standards for National Certification.
21	Kosrae State Code of Laws Title 12 Chapter 3 §12.302	The Governor provides for integration of State and National certifications of teachers	Level of integration between State and National certification	As there is no state certification standards, this criteria can not be measured with regards to levels of integration.
22	Financial Management Regulations Part 3 §3.2 (b)	All employment service contracts must be signed by the Director of Finance or his designee to certify that such employment is exempt from the State PSS	Legal status of Contracts	Compliance All Contracts of Service are legally verified and correct. The Contractees are exempt from the provisions of the State PSS.
Assignment of Personnel				
23	No documented Policies and procedures exist. Adopted as current practice	The State Director shall make all assignments of personnel to schools based on the best interest of the school system.	DOE criteria for assignment to schools. Teacher assignment data. Equity in assignments.	Compliance No documented policies relating to assignments was provided. Advice on actual approach provided by Director during interviews
24	No documented Policies and procedures exist. Adopted as current practice	State Director of Education bases the assignment upon: <ul style="list-style-type: none"> - Teacher qualifications. - Teacher certification. - Expressed needs of the school. - Best interest of the state system. 	Teacher assignment data. Equity in assignments. Equity in appointments of males and females to Principal and head teacher posts.	Compliance Again no documented policies relating to assignments was provided. Advice on actual approach provided by Director during interviews. Criteria explained by Director considered teacher qualifications and certification, school requirements and in the best interest of the Educational System.
25	Kosrae State Code of Laws Title 18 Chapter 4 §18.401	Performance evaluations shall be used in determining eligibility for retention status in reduction-in-force, promotions, change in duties/reallocation decisions, transfers, change in status (as from probation to permanent, temporary to permanent, etc.)	Scope of performance evaluations to inform in staffing assignments	Partial Compliance Performance evaluations are completed with each teacher. Their use in determining eligibility for reductions in force, promotions, transfers and status are limited due to the provisions outlined in personal contracts.

26	<p>THERE ARE NO AREA SPECIALIST</p> <p>No documented Policies and procedures exist. Adopted as current practice at a local level</p>	<p>Principles will manage use of Subject Area Specialists will be based upon:</p> <ul style="list-style-type: none"> - Assessed needs of the school or activity. - Availability of personnel. - Availability of funds. - Subject Area Specialists will liaise with the Instruction and Curriculum Coordinator to work with teachers to develop instructional material, plan, and assist in teaching methods development specific to the area. 	<ol style="list-style-type: none"> 1. Allocation of Area Specialists. 2. Area Specialists' work programs. 	<p>This criterion can not be assessed as the current Director finished the positions of subject area specialists. Individual teachers requiring specialist assistance appear to be seeking peer review and support. In the past, subject area specialists did liaise with Curriculum coordinator.</p>
Services for Children with Disabilities				
27	<p>FSMC, Title40. Education Chapter 1 §107. Procedures to ensure education for children with disabilities. Source: PL 8-132 § 8. Editor's note: The former subchapter I, §§101-118, "Trust Territory Educational System", of chapter 1 was repealed by PL 6-45, §1. All sections of subchapter II, §§121-128 "Federated States of Micronesia Educational System" were repealed by PL 8-132, §1.</p>	<p>The Secretary shall establish, in cooperation and consultation with the State Directors of Education and Health Services of each State, a procedure to ensure the ongoing identification, diagnosis, certification, and education of children with disabilities.</p>	<p>SPED monitoring report.</p>	<p>Compliance</p> <p>The most recent Focused Monitoring Report (May 2009) noted significant improvement in the efforts of the Kosrae DOE SPED in meeting the requirements of the IDEA and the FSM Special Education Handbook. Evidence of the determination of being raised to the level of 'meeting requirements' was based on KDOE correcting all areas of outstanding non compliance from previous years and the timely submission of LPP and Quarterly Progress Reports.</p>

28	<p>FSMC, Title 40. Education Chapter 2 §235. State responsibility. Source: COM PL 7-55 § 5; TT Code 1980, 41 TTC 205; PL 8-21 § 5.</p>	<p>On or before July 1 of each year, each State shall report to the Secretary of Education the extent to which it is providing the special education for children with disabilities necessary to implement this subchapter. The report shall detail the means which the State uses to provide for the free appropriate special education of children with disabilities.</p>	<p>Copies of last 3 annual reports.</p>	<p>Compliance The Focused Monitoring Report in May 2009 highlighted the improvement by KDOE in the timely submission of LPP and Quarterly Progress Reports. The Report commended the KDOE for improvements in the quality of special education program activities with the State Education system and the implementation of the provisions of their LPP.</p>
29	<p>§236. Procedure to ensure efforts. Source: COM PL 7-55 § 6; TT Code 1980, 41 TTC 206; PL 8-21 § 6.</p>	<p>The Secretary of Education shall establish, in cooperation with the Secretary of the Department of Health Services and each State Director of Education, procedures to ensure the ongoing education, identification, location and evaluation of children with disabilities.</p>	<p>Copies of last 3 monitoring reports.</p>	<p>Compliance The Focused Monitoring Report found that there had been continual improvement in the quality of services within the special education program in Kosrae over the last 3 years. 192 students (9%) of total student numbers are being served in special education, but from 6% in 2 years</p>
30	<p>Federated States of Micronesia Continuous Improvement Monitoring System, January 2007 Individuals with Disabilities Education Improvement Act (IDEA), Public Law 108-446, 14-08.</p>	<p>1. LEA Local Performance Plan. The LPP for each FSM state is submitted to HESA no later than July 30th of each year as part of the FSM Local Education Agency (LEA) Application for IDEA Part B funding.</p>	<p>Copies of last 3 years' performance plans.</p>	<p>Compliance The Focused Monitoring Report evaluation specifically referred to the improvement of quality of services implemented within the State LPP. All reports are being submitted in a timely fashion, according to the Report and noted correction in all areas of non compliance as part of LPP and Quarterly Progress Reports</p>
31		<p>2. School Monitoring Visits. Each LEA is required to establish a local monitoring system that includes conducting monitoring visits to schools to verify the data and information used as part of the LEA Quality Progress Reports</p>	<p>List of members of monitoring teams. School visit schedule for SY2006-2007, 2007-2008 and 2008-2009. Reports on monitoring visits to 3 schools in 3 different zones.</p>	<p>Compliance. Monitoring visits are conducted each year. The 2009 Focused Monitoring Report found that over the last 12 months, the Kosrae DOE had corrected all areas of non compliance for 2008 and also 3</p>

		<p>and the LPP. 2.1. Determine the monitor or monitoring team responsible for conducting the school visits. 2.2. Establish a school visit schedule that ensures all schools will be monitored at least every 3 years. 2.3. Schedule and conduct monitoring visits to selected schools. 2.4. Transmit LEA School Monitoring Report within 10 days of the visit. 2.5. Facilitate agreed upon "actions to be taken" based on the recommendations developed for the school.</p>	<p>Evidence of facilitation of "actions to be taken".</p>	<p>areas of non compliance from 2007.</p>
32		<p>3. LEA Enforcement Actions As part of the LEA Monitoring System, each LEA must establish a system of consequences for identified compliance, non compliance, and improved performance.</p>	<p>System of consequences for identified compliance, non compliance and improved performance.</p>	<p>Compliance The Focused Monitoring Report identified that the previous area of non compliance regarding internal monitoring of programs and services has been corrected. The Report found the Internal Special Education Monitoring Action Plan was effective and has resulted in consistent monitoring of services within each school and reports are now being completed. A person within the Kosrae DOE was now appointed to responsible for Overseeing the internal monitoring system and case management processes.</p>
33		<p>LEA Quarterly Reports On a quarterly basis, the four LEAs submit to HESA a quarterly report that reviews fiscal, compliance, and performance data and information relevant to</p>	<p>Last 3 Quarterly reports.</p>	<p>Compliance The Focused Monitoring Evaluation found that all reports are being submitted in a timely manner and that training has been delivered to address immediate concerns</p>

		the IDEA Part B SPP indicators, including formal complaints, mediation, and due process requests and results.		relating to providing full justifications for all procurements and travel and other fiscal requirements. Quarterly reports address all requirements
34		HESA verification & monitoring, 618 data reports The four LEAs compile and submit the required 618 data to HESA.	Last three 618 data reports.	Partial Compliance The Focused Monitoring Report noted significant improvements in case management, reporting and that special education data system and records management are being implemented in a manner consistent with FSM polices and procedures. 618 Data reports are being submitted however, the evaluation for 2009 found minor concerns and areas of non compliance in that the SITS data system was not being fully implemented. The Report recommended that efforts are made to ensure that data system is fully implemented and that all active and Pending cases are entered into the system. The Report also found minor instances of special education folders not properly completed and forms not fully completed.
Services for Gifted and Talented students				
35	FSMC, Title 40. Education Chapter 1 §106. Gifted and talented students.	The Secretary shall establish, in cooperation and consultation with the State Directors of Education , programs to identify and encourage students who demonstrate an extraordinary ability to learn.	Programs developed to identify and encourage students	Compliance There are programs established down to Grade 6 for students who have higher than average scholastic abilities. In High school, unique and challenging subject topics are provided to these students within a classroom environment.

Public Reporting				
36	No documented Policies and procedures exist. Adopted as current practice	The State Director of Education shall disseminate educational information on State and National policy to the public.	Means of dissemination. Last 3 public announcements.	Partial Compliance No policies are in place to guide this activity. However, the Director attends each school community meeting about 2 or 3 times during the school year to report on Education programs and activities.
37	No documented Policies and procedures exist. Adopted as current practice	Each school Principle will establish forums for reporting to the community of local school programs	Forums which exist Means of dissemination	Compliance Principles all have established quarterly PTA meetings with parents. Extra-curricular activities are developed in consultation with community. However, activities are undertaken upon the discretion of the respective Principal and school and are not guided by policies
38	Kosrae State Code of Laws Chapter 7 §7.705. <u>Dissemination of information.</u>	After each meeting of the Education Advisory Board, the Board members shall call a meeting of their district PTA and share the proceedings of the Board meeting with the local members of the PTA.	Meetings conducted between Board members and district PTA	Non Compliance At this time, while Education Advisory Board Members do attend community PTA meetings, the fact surrounding the recent establishment of the Board and their efforts to establish Board arrangements, means to opportunity to meaningfully report to community has not properly availed itself
Role of the Community				
39	Kosrae State Code of Laws Chapter 7 §7.701	A member of each community will be represented on the DOE Advisory Board.	That each community has a representative on the DOE Education Board	Compliance Each municipality has a representative on the State Education Advisory Board.
40		Community/school relations are the direct responsibility of each School Principle. A program will	That each school has a forum for enhancing community local school relations.	Partial Compliance Schools and School Principals use a variety of opportunities, forums and

		be developed and implemented to utilize community resources.	The types of programs adopted to utilize community resources	event to enhance school / community relations. However, no evidence was produced of where any program has been developed or implemented to utilize community resources to assist school programs.
41	Compact II (implicit intend)	Initiatives towards Community Based Management practices / structure	Extend and role of community in local school structure	Partial Compliance The DOE is moving towards a school centered management process. Some management opportunities have already devolved to a local level, and the task of an integrated Community Based Management structure still needs more consideration
Strategic Planning				
42	Kosrae State Education Strategic Plan 2008-2012	Annual work plan (Annual School Improvement Plans) developed and implemented	Current Annual Plan	Partial Compliance All schools required to prepare Annual School Improvement Plans. Not all schools provided those plans Some Improvement plans did not represent an annual plan of activities but simply seemed to be a reprint of the department's Strategic Plan
43	Kosrae State Education Strategic Plan 2008-2012	Annual formative assessment conducted and report disseminated	Most recent assessments report on activities to date	Partial compliance An accreditation team has been established to monitor progress of annual plans, however the reports prepared and the extent of feedback could not be determined (with regards to contribution to subsequent plans)
Early Childhood Education				
44	Program Regulations and Standards Section 200.10. Class size and staffing pattern.	a) Standard classes must be staffed by a teacher and a teacher aide and, whenever possible a volunteer. Standard class must have a minimum Enrolment of 11	Teacher and class data	Compliance Analysis of enrolment and teacher data confirms that standards established for class size and teacher / student ratio are being adhered to.

		children and a maximum of 20 children enrolled. No more than 20 children will be enrolled in any one class.		
45	Program Regulations and Standards Section 500.20. Management systems and procedures.	(1) At least once each program year, with the consultation and participation of the Policy Council and, as appropriate, other community members, the program must conduct a self-assessment of their effectiveness and progress in meeting program goals and objectives.	Teacher and class data	Non compliance There is no evidence of annual self assessments having been conducted. There is no evidence of a Policy Council in operation
46	Program Regulations and Standards Section 500.30. Human resources management	(a) Organizational structure. The program must establish and maintain an organizational structure that supports the accomplishment of program objectives. This structure must address the major functions and responsibilities assigned to each staff position and must provide evidence of adequate mechanisms for staff supervision and support. This organizational structure must be aligned with the overall departmental organizational structure.	Organizational structure Staff data Staff functions and responsibilities	Partial Compliance While a curriculum structure is established, there is no formalized organizational structure for ECE. There is appropriate screening and assessment processes in place to identify students who would benefit from entering the program and to also chart Progress.
47		(c) Classroom Teachers. ECE programs must comply with all FSM National and state law and any subsequent amendments regarding the qualifications of classroom teachers.	Teacher data	Compliance The minimum standards established by the NDOE for certification of teachers are being met. These standards include a minimum qualification of an AA/AS degree. There are 13 teachers employed in the ECE Program
48		(f) Staff performance appraisals. The program must, at a minimum, perform annual performance reviews of ECE staff member and	Annual performance review Staff training and professional development	Partial Compliance Performance reviews are conducted twice years for ECE teachers. However, there is no evidence of the

		use the results of these reviews to identify staff training and professional development needs, modify staff performance agreements, as necessary, and assist each staff member in improving his or her skills and professional competencies.		results of such reviews directly contributing to and professional development needs or in the improving of teacher skills.
Pedagogy Compliance				
	Curriculum and Instruction			
49	FSMC, Title 40. Education Chapter 1 §110. National Curriculum Minimum Standards.	The Secretary shall establish, in cooperation and consultation with the State Boards of Education and the State Directors of Education, National Curriculum Minimum Standards.	Copies of National Curriculum Minimum Standards widely available	Compliance National Curriculum Minimum Standards were developed by a working group, including representatives from Kosrae DOE, and were approved by the State Director of Education at a FACSSO meeting in March 2008. Copies of the National Curriculum Minimum Standards are available to staff.
50	FSMC, Title 40. Education Chapter 1 §110. National Curriculum Minimum Standards.	State Departments of Education and Boards of Education shall ensure that the National Curriculum Minimum Standards are implemented through their State Curriculum framework.	Analysis of State and National Curriculum and evidence of activity to bring about alignment	Partial Compliance A working party was established to ensure National Curriculum Minimum Standards were implemented through the State Curriculum framework. However, there is no evidence to indicate that activities were undertaken to review and compare the two curricula standards.
51		The State Director of Education shall assess and plan the core curriculum and make any changes necessary to the general curriculum.	Published Core Curriculum and general curriculum	Partial Compliance The Director through the Curriculum Coordinator has developed and published a range of Standards based Curriculum Guides for teachers. While the auditor was advised that core curriculum has been developed

				for all subjects and all grades, evidence was only provided for Social Studies and Language arts for grades 1 to 10. No documents were provided for Maths or Science. Focus group meetings with teachers reveals that all teachers use and acknowledge the usefulness of the developed curriculum.
52		The State Director of Education will receive reports of curriculum status from the Curriculum Coordinator. The Curriculum Coordinator will conduct needs assessments, gather test data, gather input from students and the community, and draft all necessary reports for submission to the State Director of Education.	Last 3 reports	Non compliance There is no evidence of report being provided on a regular basis to the Director.
53		The State Director of Education shall establish a core curriculum in which each student shall demonstrate competency prior to graduation from secondary school.	Core Curriculum	Compliance Core curriculum has been developed by a working group of subject specialist, secondary and elementary school teachers. There was some support and coordination from the State Curriculum coordinator.
54		Minimum requirements of a core curriculum are: 1. Language –oral and written. 2. Social Studies. 3. Science. 4. Math 5. Vocational Skills. 8. Kosraean Skills and Culture.	Core curriculum documents for all subjects	Compliance School core curriculum benchmarks for English Language, Social Studies, Science and Maths have been developed. Curriculum for vernacular language and Kosraean skills and culture has also been developed
55		The State Director of Education reviews, on an established schedule, all instruction and curriculum programs offered	Schedule of review	Partial Compliance Detailed reviews of curriculum are conducted on a 5 year cycle. Discussions with teachers revealed

		throughout the State.		that this period is too long and the reviews should be more regular, namely 3 years. There appears to be no data of suitability of curriculum on a more regular basis within the cycle
56		The State Director will designate staff persons to review and monitor all instruction and curriculum programs.	Schedule of review Personnel assigned	Non Compliance While there is a program of school and classroom visits by curriculum staff, there is limited reporting of actual observational data.
Staff Development				
57	Kosrae State Code of Laws, Title 5 (The Executive), Chapter 2 (Organization) §5.202 (3)	The Department of Education will conduct teacher training and evaluation	Teacher training programs conducted	Non compliance No formalized teacher training programs are conducted. Teachers are undertaking COM courses for AA/AS but no other teacher training is conducted. Apart from performance evaluation forms, no evaluation is conducted of teacher skills. There has been no training needs analysis of teacher skills and areas of development. No training plan for teachers exists. Some teachers at attending the University of Guam in order to complete Bachelor Degrees.
58	No documented policy	The State Director of Education may establish in service training in skills development and skills upgrading. The in-service schedule will be set by the State Director of Education in the best interests of the Department and availability of trainers.	In service training conducted. Methods used to identify training needs and areas of skill development	Non compliance There are no formalized regular in service training programs not training plans for teacher skills development with the exception of the K-TEC program. No TNA has been conducted.
59	No documented policy	That the Staff Development Coordinator ensures required programs of staff development and teacher training	Programs available	Non compliance The Staff development co-ordinator does not make available any programs for teacher training or

		are available.		skills development
	Testing program			
60	No documented policy	The State Director of Education and/or his designee shall ensure that testing programs used in the schools are culturally appropriate and applicable to the needs of a developing society. Designee: Instruction and Curriculum, Testing Specialist	Criteria for evaluation of testing programs Report on appropriateness of testing programs	Compliance There are no organizational policies and procedures relating to testing programs, however the Testing specialist has developed 'testing guidelines'. Kosrae State Testing (KAT) are prepared to compliment NST developed by the NDOE. KAT tests are designed to evaluate locally developed curriculum. Volunteers with WTP also administer weekly subject tests to evaluate appropriateness in materials and gauge student learning. Reports are prepared each year on KAT, however non were provided for 2009.
61	No documented policy	The Testing Specialists will: 1. Review for: a. Cultural appropriateness. b. Student's needs. c. Applicability to Kosraean society. d. Reliability and validity. 2. Recommend changes in test use or type of test. 3. Take action.	Report on recent review of test	Partial compliance The testing specialist are actively involved in administering the NST and the development and administering of the KAT. Guidelines for testing include development of test materials, preparation for Test Administration and Testing Administration. However, no evidence supports cultural appropriateness and applicability to Kosraean society in the development of tests. Review is built into the testing guidelines but no report highlights actual review methodology not outcomes of review. No testing report was available for 2009

State Scholarship and Loan Fund				
62	Student Scholarship, Grant and Loan Regulations Part 3. §3.1	Scholarships, grants and loan shall only be to a student who: e. is domiciliary of Kosrae f. In need of the amount of scholarship, grant or loan to pursue a course of study on a full time basis as an undergraduate, graduate or professional student at an institute of higher education g. Has been accepted for enrolment at an institute of higher education h. Has a cumulative grade point average of 2.5 or above	Documented Criteria used to qualify students	Compliance Scholarships, grants and loans are allocated by the Scholarship and Loan Committee in accordance with the provisions outlined in regulations and guidelines.
63	Student Scholarship, Grant and Loan Regulations Part 4. §4.1	The Scholarship Board shall select recipients of scholarships, grants and loans based on the cumulative gpa, field of study, year in the institution and the amount of financial need	Selection Criteria	Compliance From the guidelines and application forms provided by the Scholarship Committee, the stated regulatory qualifications for eligibility for scholarships, grants or loans are fulfilled in the selection of recipients.
64	Kosrae State Code of Laws Title 7 Chapter 10 §1003 (5)	The Board reports in writing to the Governor and the Speaker no later than the first day of June and December of each year regarding an accounting statement that includes: (a) all sources and amounts of funding or income; (b) all scholarships awarded; (c) all office related expenses and expenditures; and (d) a list of all current and past scholarship recipients, the scholarship amount awarded, school they attend or have	Copies of reports forwarded to Governor	Compliance Reports are furnished by the Board in accordance with regulatory provisions

		attended and past due balances.		
Administration Compliance				
State Education Advisory Board				
65	Kosrae State Code of Laws Title 7 Chapter 7 §7.704 (1)	The Board shall receive monthly updates from the Director on. (a) Reported expenditures in the district. (b) Results of any department audits; (c) District staffing levels. (d) Results and analysis of State Academic exercises such as the NST tests; (e) Proposed curriculum changes; and (f) Any changes, or proposed changes to State educational policies and goals	Reports received from Director	This criterion can not be measured as the State Education Advisory Board has only recently been established and has not started to receive reports for the Director yet.
Scholarship Board				
66	Kosrae State Code of Laws Title 7 Chapter 10 §7.1004	The Board shall hire a full-time Administrator who shall be responsible to the Board to execute its programs. The Board appoints the Administrator and fixes his compensation.	Administrator Appointed	Partial Compliance An administrative support assistant has been engaged. The administrator of the Board is the chair person.
67	Kosrae State Code of Laws Title 7 Chapter 10 §7.1005	The Administrator has the following duties and responsibilities: (1) To coordinate the awarding of grants and loans for post-secondary education; (2) To advise the Board on applicants' eligibility for post-secondary grants and loans; (3) To communicate with colleges and universities on behalf of students; (4) To maintain Scholarship	Roles and duties of administrator are documented	Compliance The Administrator performs all duties as outlined in legislative provisions.

		<p>Board records, including financial and academic records of grant and loan recipients;</p> <p>(5) To maintain accounting records of all grants and loans awarded, all payments made and all amounts outstanding;</p> <p>(6) To ensure and pursue collection of loans when due, with the advice of the Office of the Attorney General; and</p> <p>(7) To fulfill such other administrative duties and responsibilities as may be delegated by the Scholarship Board.</p>		
68	<p>Kosrae State Code of Laws Title 7 Chapter 10 §10.205</p>	<p>The Department of Education retains in a Yearbook Revolving Fund all monies contributed, received and collected from yearbook sales by depositing that revenue into the fund using it strictly for the Kosrae high School yearbook</p>	<p>Yearbook Revolving fund register maintained</p>	<p>This criterion can not be measured. While this current legislation does require the DOE to retain a Yearbook Revolving Fund, all revolving funds in Kosrae have been eliminated. School Yearbooks have not been sold for several years</p>
Private Schools				
69	<p>FSMC, Title 40. Education Chapter 1 §109. Private schools.</p>	<p>Any person or persons desiring to establish and operate a private school, including a school with a religious affiliation, within the Federated States of Micronesia shall, prior to the establishment thereof, make written application for a charter to the Secretary. The application shall be signed by the applicant or applicants and reviewed by the State Director of Education and the State Board of Education of the State in which the school is to</p>	<p>Copies of Annual license applications from private schools</p>	<p>Partial Compliance The Seventh Day Adventist School in Tafunsak has been granted a license to operate. However, there has not been an annual license issued as there has been no report for DOE stating whether of not the school is operating consistent with the terms of its charter and other applicable regulations</p>

		<p>be located. Upon receipt and approval of the application by the Secretary, the Secretary shall issue to the person or persons applying therefore a charter for up to 15 years duration in the form of a mutual agreement between the chartered school and the FSM, authorizing the establishment of the school, and an annual license to operate the school, renewable by the Secretary upon a finding by the State Director of Education that the school is operating consistent with the terms of its charter and other applicable regulations.</p>		
70	Kosrae State Code of Laws Chapter 7 §7.701 (1)	There is to be established an Education Advisory Board consisting of 8 voting members representing each elementary school, the High school and one representing private schools	A representative of a private school is on Education Advisory Board	<p>Non compliance</p> There is currently no private school representative on the State Education Advisory Board, however this is being addressed by the Advisory Board and the Governor.
71	Kosrae State Code of Laws Title 12 Chapter 12 §12.202	A private school is subject to the oversight of the Department of Education and complies with the Department's regulations regarding personal hygiene and structural safety. The Department may require a private school to submit regular reports of attendance and other matters of public concern. Failure to comply with law or regulation subjects an offending private school to revocation or suspension of its charter.	Reports submitted by Private schools	<p>Non compliance</p> No regular or formalized oversight is provided by DOE of the Private School in Kosrae State. No regular reports are furnished by the private school in accordance with legislative requirements.

Hiring of Special Instructors				
72	No documented policy	<p>The Principal/Head Teacher may recommend a person for special instructor for special cultural heritage and traditional skills programs in the following manner:</p> <ol style="list-style-type: none"> 1. Describe the program and needed skills. 2. Describe the applicant's skills and background. 3. Provide a lesson plan (rough draft). 4. Describe the manner of instruction. 5. Length of the course/program. 6. Estimate cost of program. <p>These shall be submitted to the State Director of Education at the earliest possible date, but not later than one month before the expected hiring date. The State Director of Education will take action and issue a certificate of special-instructor status.</p>	<p>Process for selection of persons for special cultural heritage and traditional skills programs</p>	<p>Partial Compliance</p> <p>No documented policy or procedures addresses the hiring of special instructions, as in the case of cultural instructors. For the Cultural Education Program, a Community Working Group was established to advise of curriculum development. Eventually, 67, community persons were hired to deliver the cultural instruction, however, the selection process to identify and select instructors has not been reported on or documented to the Director.</p> <p>All other requirements as listed in this criteria have been fulfilled.</p>
Fiscal planning and Accounting System				
73	Financial Management Regulations Part 1 §1.4(i)	<p>Financial obligation is for salaries, wages, contractual services, contracts entered into for the purchase or lease of supplies, personal property, construction, real property and loans or other commitments requiring the payment of funds.</p>	<p>Extend of reporting on financial obligation</p>	<p>Compliance</p> <p>As outlined and provided for in the FMR, departmental obligations rest with the key budgetary line items. Budgets are prepared by DOE in accordance with those budgetary obligations</p>
74	Financial Management Regulations	<p>The State Director of Education shall institute a procedure for budget planning.</p>	<p>Budget planning procedure established</p>	<p>Partial Compliance</p> <p>A budgetary planning and submission procedure has been instituted and is followed. The department's procedure is strictly</p>

				followed and such procedure aligns with the provisions outlined in the Regulations. Additionally, the procedure adopted by the department is suitable to the State Department of Finance. However, while there is compliance with Department of Finance processes and the DOE follows FMR procedures, no internal policy or procedures have been developed to reinforce FMR provisions. <u>It is for this reason only, that partial compliance is assessed.</u>
75	No documented policy	Before the second quarter of the fiscal year, the State Director of Education and assigned staff will draft a tentative budget for the next fiscal year. The basis of this draft is: 1. Assessed needs of students. 2. Availability of funding. The tentative proposed budget will be presented to the Board for review. The Board and the State Director of Education will review and modify the budget as necessary. The proposed budget will be presented for Board review and the State Director of Education or his/her designee will draft the proposed budget into final form for final Board review prior to submission to the Governor.	Last draft budget reports produced	Compliance While no documented policy exists, the State Department of Finance specifies the budgetary submission process. Draft budgets are prepared in strict compliance with the State Department of Finance requirements
76	No Documented policy	The State Director of Education and/or his/her designee shall have full and final authority for control of the budget as	Accountability measures established and documented	Partial Compliance The Director does have responsibility over the budget and final control on budget requisitions,

		authorized by the Governor and the State Board of Education. Designee: Budget and Supply		however full authority seems to rest with the Department of Finance, the Governor's Office and the Legislature. IT appears that the budget is subject to some degree of access and control beyond the Director, thereby questioning his full and final responsibility, control and authority.
77	No documented policy	The State Director of Education or his designee will review all financial expenditures to ensure accepted fiscal practices.	Expenditure sheets produced for review	Compliance The Director has initiated a tiered level of oversight on budgetary and expense issues. While, again, not documented, the process is strictly followed by all relevant personnel. Principals, Budgetary office and property and procurement officer have oversight before final review is conducted by the Director. Externally, the Department of Finance exercise further review.
78	No documented policy	The State Director of Education and/or his designee shall maintain all necessary planning information and budgetary records as needed to ensure proper system operation. Designee: Budget and Supply	System established	Compliance Budgetary and expense records are maintained by the DOE. However, there are multiple records retained by various stakeholders in accordance with their specific tasks. For example, the Property and Procurement Officer maintains expenditure information. However, there appears to be no linkages between the various record holders and variations may occur. Information relating to budget changes made from central office may not cascade to a school level. While central records may accurately reflect the respective changes to budget, school records may not and confusion on actual

				budget can occur between functional areas. The Budget officer also advised that it is necessary to re-adjust DOE records with Department of Finance records due to discrepancies which occur during the financial year.
79	Financial Management Regulations. Part 1	The State's Educational-financial accounting system shall follow basic public accounting concepts and procedures and the requirements set out in the Financial Management Regulations	Level of compliance with FMR	Compliance The DOE accounting system aligns with the requirements of the FMR and the State Department of Finance.
80	No documented policy	The State Educational Budget Office will at a minimum perform the following: 1. Record every financial transaction. 2. Record all monies received as to: a. Type b. Source 3. Record all monies expended as to: a. Type b. Source 4. Establish line-item codes for control and accountability. 5. Submit quarterly-financial reports to the State Director of Education. 6. Provide data for: a. Cost-benefit studies b. Line modifications	Details recorded and maintained by budgetary office	Partial Compliance The DOE Budget office retains budget details in accordance with this criteria. While there is some ad hoc reporting to the Director, it was established that there is no regular formalized reporting system to inform the Director on budget status. For this reason only, this criterion is assessed as partial compliance.
81	No documented policy	The State Director of Education shall designate department heads and other such personnel as necessary as having budgetary responsibility.	Roles of person responsible	Compliance The Director has appointed relevant personnel to have budgetary responsibility within the department. There is a budget officer who assists

				in the preparation and co-ordination of Annual budgets and to also monitor expenditure. Oversight and other actual expense budgets are managed, in coordination with the Budget Officer by a property and procurement officer. Principals at schools have been nominated to prepare budget submissions.
	Recruitment			
82	Public Service Regulations Part 2 §2.1	The State Director of Education, in its hiring policy, will coordinate all recruitment, announcements of examination, and other matters through the Division of Personnel, Department of Administrative Services.	Procedure followed for last 3 recruitments	Compliance The responsibility for hiring policy rests with Division of Personnel in Department of administration. The procedures followed during the recruitment process comply with the Department of Administration Manual and the requirements of law. The Director coordinates all recruitments in liaison with Division of Personnel staff.
83	Public Service System Regulations Part 2 §2.1	Examination Announcements. As vacancies occur or are anticipated, examinations for recruitment shall be announced and posted in the Personnel Office, and shall be given the widest publicity justified by the vacancy.	Last 3 examination announcements	Compliance Examination announcements are posted in the Personnel Office and are given widest public publication
84	No documented Policy	When making assignments, giving consideration to the mission of the organization and structuring positions for accomplishment of requirements in the most effective and economical manner possible.	Criteria for making assignments	Partial Compliance No documented policy exists on making assignments. It is for this reason that 'partial compliance' has been assessed by this audit inspection. While it appears that consideration is given to the needs of the organization and the structuring requirements, the criteria for making assignments needs to be

				developed to ensure consistency in this area in the future.
	Personnel Performance Evaluation			
85	Kosrae State Code of Laws Title 18 Chapter 2 §18.202	The Director of Education shall utilize the performance evaluations for employees within the Department and transmit them to the Director of Administration for administrative purposes	Personnel evaluation forms from Elementary, secondary schools and DOE corporate office	Compliance Performance evaluation as completed through completion of evaluation forms either once or twice yearly in addition to observation evaluation ranging from 2 to 5 times a year.
86	No documented policy	All employees will undergo evaluation of their duties and responsibilities which will include as a minimum: 1. Compliance with job description or contract.	Personnel evaluation forms from Elementary, secondary schools and DOE corporate office	Compliance There is no documented policy or procedures in relation to performance evaluation. As a result, the approach is extremely varied. Performance evaluation is conducted at a school level. Some schools complete forms once a year, others twice, depending on the relevant Principal. Also, Observation evaluation is popular approach undertaken by Principals. The number of times formal observation is undertaken varies from 2 time a year to 5, again depending on the school.
87	Performance Evaluation Form	The performance evaluation system is designated primarily for the purpose of appraising each employee how well he is discharging his duties and responsibilities, and of indicating where in his performance he could be more effective in the application of his knowledge, skill, and abilities. It provides a means	Areas assessed as outlined in Performance evaluation sheet	Partial Compliance While there is a standardized performance evaluation form used for appraising each employees attendance to duties, the form does not indicate areas of knowledge and skill development nor where the employee stands within the organization. Additionally, some schools have

		for letting the employee know where he stands with the organization.		adopted their own performance evaluation form, meaning consistency across the department is compromised.
88		9.6 Impact of ratings. Annual written performance ratings are the basis for granting or withholding annual step increases. Employees rated "Satisfactory" or "Exceptional" shall be eligible for a step increase within their pay level. Those rated "Less than Satisfactory" shall not be eligible for a step increase, provided that if the employee concerned brings his performance up to standards, he then shall be eligible for a step increase within his pay level, but such increase shall not be changed accordingly. Annual written performance ratings serve also as one factor in selection for promotion, in determining retention status in cases of RIF, for reviewing justification for authorizing a merit increase, and in adverse actions and may be a consideration when evaluating a Superior Performance Award request.	Ratings scale established and effectiveness of scale to measure performance	Compliance The standard DOE Performance evaluation form and the individually developed performance evaluation forms at some schools rate in accordance with the satisfactory and exceptional levels. The current performance evaluation form has the ability to link with the current contracts for each teacher regarding discipline and termination.
	Development of a Table of Offences and Suggested Penalties			
89	Individual Contracts	The Director may determine appropriate action regarding failure to comply with performance provisions of a Contract through either	Contract provisions	Compliance Standard Teach Contract provides a range of required standards of conduct. Clause 13 indicates termination through 'failure to maintain satisfactory levels of performance.

				<p>Professional Standards Manual outlines all penalty sanctions and application through disciplinary process.</p> <p>Employee handbook provided to all personnel which briefly outlines disciplinary Sanctions</p>
	Professional Standards			
90	<p>Professional Standards Manual</p> <p>Strategic Plan 2008 – 2012 (Strategic Goal 4.4)</p>	A Professional Standards Manual which addresses all aspects of Discipline, Ethical behaviour and Codes of Conduct is developed.	A detailed Manual of professional standards is developed and address all relevant aspects of discipline and professional conduct	<p>Compliance</p> <p>The Professional Standards Manual has been developed and addresses all issues relating to Discipline, Ethical behaviour, Codes of Conduct and Professional Standards.</p>
91	<p>Professional Standards Manual</p> <p>Strategic Plan 2008 – 2012 (Strategic Goal 4.4)</p>	A formalised Code of Ethics is adopted	A code of Ethics is developed and inculcated into organizational culture	<p>Compliance</p> <p>The DOE has adopted and communicated to all personnel a Code of Ethics (Adopted from the Code of Ethics developed by the U.S. National Education Association)</p>
92	Professional Standards Manual	The position of Professional Standards Officer is established to overview, monitor, investigate and report on Discipline and codes of professional behaviour	The establishment of dedicated and skilled personnel to perform the role of over-sighting discipline and professional conduct	<p>Compliance</p> <p>A Professional Standards Officer has been appointed to over-sight all disciplinary investigations and maintenance of professional conduct</p>
93	Professional Standards Manual	Codes of Professional behaviour and conducted are identified, developed and implemented	Standards are identified and communicated to all personnel	<p>Compliance</p> <p>As part of the Professional Standards Project in 2008, training provided to all employees. Copies of the Employee's Professional Conduct Handbook, provided to each employee</p>
94	Professional Standards Manual	All breaches of discipline or professional conduct are fully investigated, reported and dealt with in a manner according to local statutory provisions	A process for investigation, reporting and hearing of breaches of discipline is developed and adopted.	<p>Compliance</p> <p>A disciplinary reporting, recording and investigation process developed which streamlines Regulatory requirements</p>

95	Professional Standards Manual	A streamlined process of complaint making and reporting templates are developed	A complaint making process is developed and incorporated within the discipline process. Reporting templates (are developed) which streamline current statutory requirements.	Compliance Reporting framework developed to streamline investigative and disciplinary action processes.
School Administration, Policy and Procedures				
96	No documented policy	Each school building shall be maintained, and staff supervised by a Principal/Head Teacher as assigned by the State Director of Education. The Principal/Head Teacher shall be supervised by the State Director of Education or his designee. The Principal/Head Teacher shall ensure that all programs, projects, instructional units, facilities, and staffing of the school be in accordance with the policy and procedures of the Department of Education as directed by the DOE Administration.	DOE Annual report on School administration	Partial Compliance No documented DOE policy relates to this criteria. Most school buildings and facilities are maintained to the best possible level by Principals. While staff are supervised by Principals and in turn Principals are supervised by the State Director, projects, projects , instructional units and facilities are managed in accordance with individual Principal's standards as opposed to any consistent DOE policy and procedures.
Employee regulations for assignment, transfer, leave and paid positions				
97	Public Service System Regulations	The provisions of the PSS are complied with relating to assignments, transfers, leave and paid positions	Data and records on assignments, etc	Partial Compliance While data exists on current assignments of personnel, no documented evidence was provided on past assignments. It would appear that provisions in the Public Service System and individual contracts are complied with in relation to assignments, transfers, leave and paid positions.
98	No documented policy	In determining transfer assignments, the State Director of Education and the Administrative Staff will take into	Data and records	Partial Compliance During interviews, the audit inspector was advised of the determinant for transfer

		consideration: 1. Employee's present duties. 2. Employee's present location. 3. Supervisor's recommendations. 4. Employee's input.		assignments. While the main key points are taken into consideration, no documented evidence to support was produced.
99	No documented policy	The State Director of Education and Principal/Head Teacher will review all employees to ensure that no family member has responsibility over another. As necessary, reassignment of family members may occur upon the recommendation of the Principal/Head Teacher to the State Director of Education.	Procedures established	Partial Compliance Interviews with Principals indicated that no family member has responsibility over another, however no formalized policy or procedures exist.
Supplies, Equipment and Vehicles				
100	Financial Management Regulations	The DOE Administration through Budget and supply shall coordinate the purchase of all supplies and equipment in State programs.	Processes established	Compliance Processes, while not documented internally within the department do comply with FMR and Department of Finance requirements.
101	Financial Management Regulations Part 5 §5.2	All equipment will be identified by affixing a property tag	Extent of tagging of property	Compliance All DOE property is tagged.
102	No documented policy	DOE will conduct biannual inventories. Inventories are done by matching the education ID number to the inventory list. New items will be labelled and added to the master and local school-inventory list as soon as the item is in use. These lists will be kept in the master-inventory list in the Budget and Supply office, and the school inventory list will be kept in the Principal's/Head Teacher's office.	Inventory reports	Compliance Twice yearly audit inspections are conducted by the Property and Procurement Officer. A master inventory list is retained in central office. Some schools also conduct their own audits and check off against inventory lists provided from central

		Inventories will be scheduled by the State Director of Education.		
103	Financial Management Regulations	In all instances whereby the state enters into any contract, employs any person, firm, or corporation, or undertakes any obligation which utilizes outside monies, i.e., special funds, such agreements will be made with the understanding that the State's liability is limited to the actual cost of the agreement. The State Director of Education will attach a copy of this policy as applicable to all contracts prior to signing. The signing of the contact implies the understanding of the policy terms by both parties.	Contract processes	Compliance The FMR policy is attached to contracts.
104	Financial Management Regulations Part 5 §5.5	The Director of Education shall maintain current fixed asset lists	Established asset list	Compliance Fixed asset lists are maintained and monitored
105	Financial Management Regulations Part 5 §5.6	A physical inventory should be conducted every 2 years.	Inventory reports	Compliance The FMR requires physical inventory inspections every two years. The DOE conduct these twice yearly.

Attachment Two – List of Education Personnel interviewed

Paul Hadik	Regularly	Director
Kemsky SIGRAH	Regularly	DOE Liaison Officer
Lillian WILLIAM		DOE Administration Office
Tolensa WILSON		Budget Officer
Hitmer ROBERT		Personnel Records Officer
Mona THOMSON		Admin Officer
Wilson KEPHAS		Annual Planning Officer
Aloka Joab SIGRAH		Scholarship co-ordinator
JD LEE		Attorney General
Gibson MONGKEYA		Evaluation testing
HANSON SIGRAH		Curriculum Co-ordinator
Likiaksa ELESHA	1/21 plus earlier	Acting Special Ed Coordinator
Lyndon CORNELIUS		Chairman of SPED Advisory Council
Barnabus PALSIS		SPED Resource Room
George TILFAS		ECE
Vicki MEADE		Diagnostician
Makenzie WRIGHT		World Teach
Melanie COFFEY		World Teach
Jennifer AKBABLA		World Teach
Holly LYONS		World Teach
Rick BATCHELOR		World Teach
Nathan KEEGAN		World Teach
Teresa CHAN		World Teach
Liora BARBA	20	World Teach
Kristin CASPAR		World Teach
Pat RAMSDEN		World Teach
Scott KALTENBOUGH		World Teach
Tyler HENSLEY		World Teach
Regina DINNEEN		Contract Teacher

Telsin Kephass	15/1	Vocational Coordinator KSHS
Elson Timothy	15/1	Classroom Teacher H/School
Adelyn H Noda	15/1	Academic Counselor H/School
Cynthia Aaron	15/1	Admin Assistant H/School
Talutson Isaac	15/1	Principle – H/School
Lyna George	15/1	Classroom Teacher – H/School
Palmer Seymore	15/1	Career Counselor
Wilson KEPHAS	18/1	Bridging the Gap Co-ordinator
Tulensra	18/1	Budget Officer
Tulensru WAGUK	Utwe Elementary School	Principal
Turpin EDMOND		Teacher
Eldon JOSEPH		Teacher
Nona NENA		Teacher
McKenzie WAGUK	40	Teacher
Linson WAGUK		Teacher
Bruce ANDREW		Teacher
Emius NENA		Advisory Board Member
Gibson MONGKEYA	19/1	Testing Specialist
Fletcher	19/1	Testing Specialist
Mary Bea KLAVA	19/1 Malem	Principal
Swin CHARLEY		Teacher
Arlonza TALLEY		Teacher
Kun CORNELIUS		Teacher
Shrew JONAS		PTA
Genie JONAS		Teacher
Henry PHILLIP		Teacher
Evelyn ANTON		Teacher
Mixon JONAS		Vice Principal
Michelle ANTON		Teacher
Rusty ANTON		Teacher

Shrew JONAS		Teacher
Yvonne LIPAN		Teacher
Bonna SHREW		Teacher
Alister TOLENOA	60 20 / 1	Cultural Program co-ordinator
Alokoa TALLEY		Cultural Co-ordinator
Mona THOMSON	20/1	Property / Procurement Co-ordinator
Hobina RENTON		
Quartus Esau	Sansrik Elem. School	Principal
Sophia JONAS		Teacher
M SIGRAH		Teacher
Leilani ABRAHAM		Teacher
Sueleen ALIKSA		Teacher
Cordilia ABRAHAM		Teacher
Annang WELLY		Teacher
Scott NENA		Teacher
Lipton TILFAS		Teacher
Mitchigo NEDLIC		Teacher
Betsy Rose SIGRAH		Teacher
Jose CORNELIUS		Teacher
Elsina TOLENNA		Clerk
Sydney SKILLING		Advisory Board Member
Lugo Skilling		
	1/21 Tafansak	
Maenald JONAH		V Principal
Reynold SEYMORE	80	Teacher
Penina TULENSRU		Teacher
Mitha SKILLING		Teacher
Pricilla TAULUNG		Teacher
Sepe EDMUND		Teacher
Aloka JOHNITHAN		Teacher
Clarensen TAULUNG		Principal

Kimie JACK		Secretary
Tyron NED		Teacher
Donald MONGKEYA		Teacher
Ketty WILLIAM		Teacher
Joas PALSIS		Teacher
Srue GEORGE		Teacher
Seprina TULENSRU		Teacher
Harry ELLEY		Teacher
Allursm ALIK	95	Teacher
	Lelu E/School	
Jonis ABRAHAM	1/22	Principal
Aliksa SIGRAH		Teacher
Ruthey LUCKMIS		Teacher
Lucian SIGRAH		Teacher
Romeo ALIKSA	100	Librarian
ELSA SIGRAH		Teacher
Minnie BENJAMIN		Teacher
Eternu EDWIN		Teacher
Peta NODA		Teacher
Jack NEDLICK		Teacher
Kikio NELSON	106	Teacher

Attachment Three – List of documents reviewed

Document	Provided by
PSS Regulations Electronic	JD
Draft State Kosrae Code - Electronic	JD
Organizational Chart	Kemsky
DOE Strategic Plan 2008 - 2012	Kemsky
DOE Copy of Manual of Administration for Department of Administration and Finance	Kemsky
Kosrae State Special Education Focused Monitoring Report – May 11, 2009	Likiaksa
Student Profile for Special Education 2009-2010	Likiaksa
Template Standard Teacher Contract	Hitmer
Special Education Procedures Manual	Likiaksa
2008-2009 summary data – Electronic -	Mona
Enrolment Sansrick - electronic	Mona
Staff listing profiles - electronic	Hitmer
School asset inventory - electronic	Mona
Kosrae Budget FY09 - electronic	Mona
List of World Teach volunteers	Scott
Enrolment lists for H/S Tafansak, Malem and Utwe. Electronic Data 09-10	Mona
Scholarship Loan Fund application	Alokoa Sigrah
Scholarship, Grant and Loan Fund Regulations	Alokoa Sigrah
Scholarship Awardee status lists 2004-2008	
Kosrae Budget Request FY09 – Revised - electronic	Wilson Kephass
Year End Report FY07 and Performance Report FY08 - Electronic	Wilson Kephass
Kosrae SEG integrated Budget 09 - Electronic	Wilson Kephass
PRS09 Reports	
FSM Employment trends – powerpoint - electronic	
Kosrae Secondary Standards Benchmarks and	Hanson SIGRAH

Learning Priorities For Social Studies – hard copy	
Standards Based Curriculum Guides For Social Studies Grades 1 to 3	Hanson SIGRAH
Standards Based Curriculum Guides For Social Studies Grades 4 to 6	Hanson SIGRAH
Standards Based Curriculum Guides For Social Studies Grades 7 to 9	Hanson SIGRAH
Teacher’s Guide Grade 5 Language Arts Program Curriculum Mapping – Sept 07	Hanson SIGRAH
Teacher’s Guide Grade 6 Language Arts Program Curriculum Mapping Sep 07	Hanson SIGRAH
Teacher’s Guide Grade 7 Language Arts Program Curriculum Mapping Sept 07	Hanson SIGRAH
Teacher’s Guide Grade 8 Language Arts Program Curriculum Mapping Sept 07	Hanson SIGRAH
Teacher’s Guide Grade 9 Language Arts Program Curriculum Mapping March 07	Hanson SIGRAH
Teacher’s Guide Grade 10 Language Arts Program Curriculum Mapping June 07	Hanson SIGRAH
Performance Budget Summary 2004	Wilson KEPHAS
Kosrae Supplemental Education Grant FY 2006 Grant Proposal August 2006	Wilson KEPHAS
Kosrae Supplemental Education Grant FY 2006 Grant Proposal Dec 2006	Wilson KEPHAS
Kosrae Supplemental Education Grant FY 2006 Grant Proposal Feb 2006	Wilson KEPHAS
Performance Budget Summary 2007	Wilson KEPHAS
Line Item Budget Combined Aprl. 04	Wilson KEPHAS
Government Expenditure Summary No year	Wilson KEPHAS
Class Specification for Classroom Teachers, Counsellors and Principals	Personnel
Class Specifications for Clerk Typist	Personnel
Class Specification school secretary	Personnel

Class Specification for Education Specialist – curriculum	Personnel
Class Specification for Administration Officer	Personnel
Job Description for Administrator Facilities and Support Services	Lugo Skiling
Jemco 20 indicators spread sheet - electronic	Lugo Skiling
EMIS Data – electronic – for FSM National	Lugo Skiling
Kosrae High School – School Improvement Plan (SIP)	HIGH SCHOOL
Classroom Inventory Form 2009-2010	
Annual Textbook Inventory Form	
KSHS Policy Handbook	
KSHS Quarterly Report Form	
KSHS Teacher’s performance Evaluation Form	
MES Organizational Chart	Malem Elementary School
Example of Special Services Contract	
Teacher Performance Evaluation Report	
Standard Teacher Contract Renewal Form	
MES Policy Handbook	
Personnel Action for Contract Employees	Budget Co-ordination Unit
Standard Teachers Contract + Duties and Responsibilities attachment	
Education Sector Funds – 4 th Quarter Expenditure Report FY 2009	
Kosrae Budget FY09 Revised EPIC Formula 2010	
Guidelines for State Testing	Testing Co-ordination Unit
Tables – mean average for KLPT (2001 – 2009), MCRT (1997 – 2009), H/S Entrance Test (2003-	

2009), KAT (2007- 2009), NST (2000 – 2008)	
FSM National Testing Guidelines	
Testing Summary Report School Year 2002-2003	
School Improvement Plan Utwe Elem. School – 2009-2014	Utwe Elementary School
Kosrae State – Manual of Administration	
	Sansrik Elementary School
School Improvement Plan	Tafunsak Elementary School
Teacher Observation Sheet	
Teacher Evaluation Sheet Form and ratings sheet	
Lelu Elem. School Policy Handbook	Lelu Elementary School
Lelu Elem School Enrolment SY 2009-2010	
2008-2009 Cultural Co-ordinator ‘closing ‘ report	Cultural Co-ordinator
Cultural Curriculum Guidelines	
Cultural Skills Curriculum schedule	
Cultural Education Program 2008-2009	
Cultural Education Program Report to PIBBA Conference	
Culture Curriculum – Standard Based Guide	
LEA Quarterly Progress Report. Oct-Dec 2009	Special Education
Sped LPP for 2008-2009	
SPED Program Enrolment 2009-2010	
Students with disabilities – State Assessments 2009	
November 2008, T3 Report Status	T3 Program
Example of Fixed Asset sheet 2009	Mona – Property and Procurement Officer
Example of Property Listing sheet	
Year End Report FY07 and Performance FY08 – Electronic	
School inventory List – Electronic -2009 covering	

Desks, Sports equipment, cabinets, fans, fixed assets, gasoline, stamps	
Outgoings and request for payment spread sheet – electronic.	

Attachment Four – Sample Contracts for teacher employees

<p style="text-align: center;">Contract No. _____</p> <p style="text-align: center;">STATE OF KOSRAE STANDARD TEACHERS CONTRACT</p> <p>THIS CONTRACT, by and between Kosrae State Department of Education ("DOE") and Your Teacher's Name _____ ("Teacher") WITNESSETH:</p> <ol style="list-style-type: none"> 1. The DOE hereby employs the Teacher for duration of One (1) year, subject to funding availability, and agrees to pay the Teacher for said services a sum of _____ per year. All instructional employees shall be paid in twenty-six (26) bi-weekly installments. 2. Teaching assignment(s): <u>Classroom Teacher</u> and such other duties as may be assigned by the School for which the Teacher is properly certified. 3. Teacher agrees to perform all teaching assignments in accordance with the highest professional standards and to have and maintain the qualifications required to teach the aforesaid grades or subjects during all times that performance is required hereunder. 4. It is understood and agreed by the parties that this Contract is subject to the Policies of the School, which are by reference incorporated herein and made a part of this agreement the same as if fully set forth herein. 5. The Department may terminate this Contract prior to the end of the school year for cause. Any justification sufficient to warrant termination under the regulations of the Public Service System (PSS) is sufficient to warrant termination of the Contract by the Department prior to the end of the school year. Any material false statement made in the written application for a position with the School shall also constitute sufficient grounds for voiding this Contract. 6. It is mutually understood and agreed by and between the parties that nothing herein contained shall operate or be construed as a waiver of any of the rights, powers, privileges, or duties of either party hereto, by and under the laws of the State of Kosrae, except as expressly stated in this Contract. Contract teachers are exempt from the Kosrae State PSS by virtue of Title 18, section 18.107. 7. Notwithstanding that Contract teachers are exempt from the Kosrae State PSS, Teacher and his/her dependents are eligible for the State sponsored FSM Health Insurance Program and Group Life Insurance Program, and the State shall pay that portion of the premium, which it pays for other employees of the State. 8. Teacher shall participate in the Social Security Program of the FSM and the State will pay that portion customarily paid on behalf of employees of the State. 9. Teacher shall work a normal school day. The normal school day shall begin 30 minutes prior to the first class of the day and shall continue until one hour after conclusion of the last class of the day. In addition, Teacher may be required to occasionally participate in after-school activities such as PTA meetings, school activities, committees, or similar programs designed to improve education. <p style="text-align: center;">Standard Teacher Contract 1</p>	<p>The Teacher shall work a school year that begins two (2) weeks prior to the first day of the each school term until one week after the last day of school. During the school year, Teacher shall perform such teaching and other related duties as may be assigned and shall be available for training and in-service programs. Teacher shall not be required to work on any day taken as a Holiday by the State of Kosrae. Notwithstanding the school term, should Teacher be required to take courses to maintain certification or for voluntary individual improvement, attending or studying for such courses shall not be additionally compensated, nor shall they be credited as "days of work", regardless of whether done during the school year or during any holiday break, to include summer vacation, nor shall any expenses be reimbursed.</p> <ol style="list-style-type: none"> 10. Each teacher shall be credited with ten (10) days of sick leave on the first day of each contract year. Sick leave shall not be cumulative from year to year. Sick leave may be used for the personal illness of the teacher, or for death or illness within the immediate family. Immediate family shall mean spouse, child, parent, or brother or sister. 11. Each teacher shall be allowed up to ten (10) days of personal leave with full compensation that may be taken for any reason upon sufficient advance notice to the appropriate Principal. Personal leave is not cumulative nor shall any unused leave time be compensated. Accrued but unused leave time shall not be used to shorten the term of the contract. 12. Teacher shall receive an annual performance review at least six (6) months before the next contract renewal. Satisfactory performance and conduct is a requirement for contract renewal. 13. Teacher shall be entitled to the renewal of this Contract unless cause exists for non-renewal. <u>Non-renewal may be based on any justification sufficient to warrant termination under the regulations of the Public Service System; any change in certification requirements applicable to all teachers generally which renders the teacher unqualified for the position; elimination of the position for which the teacher was previously employed; lack of funding; or failure to maintain satisfactory levels of performance or conduct. However, contract renewal cannot be denied for failure to maintain satisfactory levels of performance or conduct unless the employee has, not less than six months previously, been given notice of such deficiencies and a reasonable opportunity to improve.</u> In the event that the DOE intends to not renew this Contract, Teacher must be notified at least thirty, (30), days prior to the first day of the following school year. 14. Teacher may terminate this Contract prior to the end of the school year for compelling reasons of an emergency or humanitarian nature and upon at least fifteen working days advance notice. The notice requirement may be waived in the discretion of the Department. 15. The laws of the State of Kosrae shall govern this Contract and jurisdiction over a dispute arising from this Contract shall be with the courts of the State of Kosrae or the Federated States of Micronesia. 16. Contractor agrees to comply with all applicable standards, orders and requirements issued under local environmental laws as well as comply with other local laws, including those with regard to kickbacks and corrupt practices. 17. Contractor agrees to allow access by Kosrae, the Government of the Federated States of Micronesia and its sub-grantees, the Government of the United States, or any of their duly authorized representatives to ay books, documents, papers, and records of Contractor which are directly pertinent to this Contract for the purpose of making audit examinations, excerpts and <p style="text-align: center;">Standard Teacher Contract 2</p>
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Attachment Four (continued) – Sample Contracts for teacher employees

transcriptions. Contractor will keep all required records for three years after final payment is made and all other pending matters are closed.

18. In the event any part or portion of this Contract shall be found to be unenforceable, then such part or portion shall be severed from the remainder as if never a part of this Contract, and the remainder of this Contract shall remain in full force and effect.

19. This contract with the attachments states all the terms and conditions of the agreement between the parties and no other conditions, promises, or representations have been made and no prior oral or written understanding pertaining to the subject of this contract shall have any validity or effect. The terms and conditions of this contract may not be altered, amended, or modified except by a written agreement signed by all parties hereto.

Witness our signatures:

_____	_____
Teacher	Date
_____	_____
Director, Department of Education	Date
_____	_____
Attorney General (Approved as to legal form)	Date
_____	_____
Director of Administration	Date
_____	_____
Governor, Kosrae State	Date

Standard Teacher Contract
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Attachment Five – Sample Position Descriptions

<p>Justification:</p> <p>POSITION SUMMARY</p> <p>To provide part time instructional service and guide students through hands-on activities in cosmetology and provide, theoretical and practical application in cutting, strengthening, tinting and bleaching of hair, wig, hairpiece and manicuring as well as facial.</p> <p>DUTIES AND RESPONSIBILITIES</p> <ol style="list-style-type: none"> 1. Assist in integrating industry and academic standards within curriculum development 2. Provide group and individual instruction utilizing the most effective teaching strategies 3. Assist in recruitment and prepare students for employment or advancement in cosmetology 4. Prepare daily lesson plan and deliver them 5. Evaluate students' skills and competencies and job readiness and maintain accurate students' records (performance, attendance, etc.) 6. Manage classroom in such a way to ensure that the environment is conducive to learning and appropriate for the instructional activities. 7. Select instructional supplies and materials along with appropriate equipments, tools and furniture to support instructional activities 8. Keep abreast of current practices and training methods 9. Ability to relate to high school age students 10. Perform other job-related duties as assigned <p>QUALIFICATIONS</p> <p>Certified in cosmetology or closely related area with considerable knowledge and experiences in the field; Two to three years teaching experience; pleasant personality and some knowledge in entrepreneurship or experience in business administration.</p>	<p>CLASS SPECIFICATION FOR CLASSROOM TEACHERS, COUNSELORS AND PRINCIPALS GRADE 701-00</p> <p>TEACHER AIDE GRADE -8 An employee in this class provide temporary teaching work for less than six hours per day and less than 32 hours per week. The incumbent provides mentor's skills in English writing and reading and math for the lower grade levels.</p> <p>STANDARD TEACHERS GRADES – 10-12 Provide daily instructions to elementary grade levels. Prepare daily and weekly lesson plans. Assess student performance and report to supervisor</p> <p>GRADES – 13-17 Provide daily instructions to high school grade levels. Provide daily and weekly lesson plans. Assess student performance and reports to supervisor.</p> <p>COUNSELORS GRADES – 11-14 Assists students in selecting course studies. Provide assistant in identifying schools and filling up applications on (admission, financial and other pertinent documents for post secondary education.) Provide counseling and workshops to students in general school conduct and yearly requirement of each grade level. Keep database on student's performance for tracking and monitoring. Provide daily monitoring on students who undergo behavior modification programs.</p> <p>VICE PRINCIPALS GRADES 11-13 Vice Principal positions are teaching positions. Assist the Principal in the overall administration of the school. Serve as Principal in the absence of the principal. Prepare and propose schedule of classes and extra curricular activities. Carries out supervisor responsibilities in accordance with school systems policies and applicable laws.</p> <p>PRINCIPALS GRADES 14-17 Provide leadership of all teaching and non-teaching staff. Manage effectively all aspects of the school as an educational enterprise. Periodically evaluate school programs through test scores, collected data, and through contribution of parents or other state leaders. Establish and maintain good relationship with PTA, Community leaders and other state leaders to improve achievements. Develops and maintains system for reporting to parents on the progress and achievement of students</p> <p>700-6</p>
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Attachment Six - FSM Census Data - 2000

Source: 2000 FSM Census, unpublished data.

General enrollment Rates by level, sex and state

Level	FSM	Yap	Chuuk	Pohnpei	Kosrae
Student enrollment					
Elementary	92.3	88.0	93.0	88.6	71.8
Male	91.7	87.8	92.1	87.8	69.6
Female	92.9	88.3	94.0	89.4	74.2
High school	72.3	74.4	77.6	58.4	83.4
Male	68.1	77.6	70.7	55.4	83.1
Female	76.7	70.9	84.5	62.1	83.8

Youth literacy* rate by sex and state

Sex	FSM	Yap	Chuuk	Pohnpei	Kosrae
Total	95.1	98.0	92.3	97.7	99.7
Male	94.2	98.7	90.9	97.2	99.3
Female	96.0	97.5	93.8	98.3	99.9

Note: * Persons 15 to 24 years and older

Summary indicators by state, FSM: 2000

Indicator	FSM	Yap	Chuuk	Pohnpei	Kosrae
Total population	107,008	11,241	53,595	34,486	7,686
Female	52,817	5,733	26,437	16,820	3,827
Male	54,191	5,508	27,158	17,666	3,859
Average growth rate	0.256	0.102	0.093	0.421	0.890

Median age	18.9	20.9	18.5	18.9	19.2
Labor force participation rate	58.6	72.3	57.6	57.7	48.2
Gross enrollment rate	55.1	59.0	56.4	50.1	63.2
Percent who graduated high school	36.6	58.8	30.4	34.2	47.9
Youth literacy rate (persons 15-24 years	95.1	98.0	92.3	97.7	99.7

Total Population by Age Group, FSM

Age group	Total	Male	Female
All persons	107,008	54,191	52,817
Under 5 years	14,783	7,579	7,204
5 to 9 years	14,169	7,310	6,859
10 to 14 years	14,220	7,481	6,739
15 to 19 years	13,237	6,754	6,483
20 to 24 years	9,525	4,886	4,639
25 to 29 years	7,603	3,695	3,908
30 to 34 years	6,489	3,124	3,365
35 to 39 years	6,015	2,994	3,021
40 to 44 years	5,559	2,801	2,758
45 to 49 years	4,647	2,393	2,254
50 to 54 years	3,209	1,654	1,555
55 to 59 years	1,898	899	999
60 to 64 years	1,733	830	903
65 to 69 years	1,487	699	788
70 to 74 years	993	457	536
75 to 79 years	727	310	417
80 to 84 years	328	138	190
85+ years	386	187	199
Median age	18.9	18.5	19.3