

Republic of Palau Part B FFY 2009 SPP/APR Response Table

| Monitoring Priorities and Indicators | Status of APR Data/SPP Revision Issues | OSEP Analysis/Next Steps |
|--|---|---|
| <p>1. Percent of youth with IEPs graduating from high school with a regular diploma. [Results Indicator]</p> | <p>Republic of Palau (ROP) provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions. ROP indicated that stakeholders were provided an opportunity to comment on the targets for FFY 2011 and FFY 2012.</p> <p>ROP's FFY 2009 reported data for this indicator are 9%. These data remain unchanged from the FFY 2008 data of 9%. ROP did not meet its FFY 2009 target of 40%.</p> | <p>OSEP looks forward to ROP's data demonstrating improvement in performance in the FFY 2010 APR, due February 1, 2012.</p> |
| <p>2. Percent of youth with IEPs dropping out of high school. [Results Indicator]</p> | <p>ROP provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions. ROP indicated that stakeholders were provided an opportunity to comment on the targets for FFY 2011 and FFY 2012.</p> <p>ROP's FFY 2009 reported data for this indicator are 18%. These data remain unchanged from the FFY 2008 data of 18%. ROP did not meet its FFY 2009 target of 10%.</p> | <p>OSEP looks forward to ROP's data demonstrating improvement in performance in the FFY 2010 APR, due February 1, 2012.</p> |
| <p>3. Participation and performance of children with IEPs on statewide assessments: A. Percent of the districts with a disability subgroup that meets the State's minimum "n" size that meet the State's AYP targets for the disability subgroup. [Results Indicator]</p> | <p>Not applicable.</p> | <p>Not applicable.</p> |
| <p>3. Participation and performance of children with IEPs on statewide assessments: B. Participation rate for children with IEPs. [Results Indicator]</p> | <p>ROP provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions. ROP indicated that stakeholders were provided an opportunity to comment on the targets for FFY 2011 and FFY 2012.</p> <p>ROP's FFY 2009 reported data for this indicator are 95.7% for reading and 100% for math. These data represent slippage from the FFY 2008 data of 100% for reading and remain unchanged from the FFY 2008 data of 100% for math. ROP met its FFY 2009 targets of 90%.</p> <p>ROP provided a Web link to FFY 2009 assessment results reported in the APR and 618 data tables. However, ROP does not publicly report assessment results for nondisabled</p> | <p>OSEP appreciates ROP's efforts to improve performance.</p> |

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| Monitoring Priorities and Indicators | Status of APR Data/SPP Revision Issues | OSEP Analysis/Next Steps |
|--|--|--|
| | students, and therefore is not required to publicly report assessment results for students with disabilities pursuant to 34 CFR §300.160(f). | |
| <p>3. Participation and performance of children with disabilities on statewide assessments:</p> <p>C. Proficiency rate for children with IEPs against grade level, modified and alternate academic achievement standards.</p> <p>[Results Indicator]</p> | <p>ROP provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions. ROP indicated that stakeholders were provided an opportunity to comment on the targets for FFY 2011 and FFY 2012.</p> <p>ROP's FFY 2009 reported data for this indicator are 12.5% for reading and 12.5% for math. These data represent slippage from the FFY 2008 data of 76.1% for reading and 30.9% for math. ROP did not meet its FFY 2009 targets of 41% for reading and 26% for math.</p> <p>ROP provided a Web link to FFY 2009 assessment results reported in the APR and 618 data tables. However, ROP does not publicly report assessment results for nondisabled students, and therefore is not required to publicly report assessment results for students with disabilities pursuant to 34 CFR §300.160(f).</p> | <p>OSEP looks forward to ROP's data demonstrating improvement in performance in the FFY 2010 APR due February 1, 2012.</p> |
| <p>4. Rates of suspension and expulsion:</p> <p>A. Percent of districts that have a significant discrepancy in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and</p> <p>[Results Indicator]</p> | <p>ROP provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions. ROP indicated that stakeholders were provided an opportunity to comment on the targets for FFY 2011 and FFY 2012.</p> <p>ROP's FFY 2009 reported data for this indicator are 0%. These data remain unchanged from the FFY 2008 data of 0%. ROP met its FFY 2009 target of 0%.</p> <p>ROP reported its definition of "significant discrepancy."</p> | <p>OSEP appreciates ROP's efforts to improve performance.</p> |
| <p>4. Rates of suspension and expulsion:</p> <p>B. Percent of districts that have: (a) a significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with</p> | <p>Not applicable.</p> | <p>Not applicable.</p> |

Republic of Palau Part B FFY 2009 SPP/APR Response Table

| Monitoring Priorities and Indicators | Status of APR Data/SPP Revision Issues | OSEP Analysis/Next Steps | | | | | | | | | | | | | | | | | | | | |
|--|--|---|----------------------------------|--------------------------------|----------------------------------|-----------------|--|----|----|----|-------|--|----|----|----|--------|--|---|---|---|-------|--|
| <p>requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.</p> <p>[Compliance Indicator]</p> | | | | | | | | | | | | | | | | | | | | | | |
| <p>5. Percent of children with IEPs aged 6 through 21 served:</p> <p>A. Inside the regular class 80% or more of the day;</p> <p>B. Inside the regular class less than 40% of the day; or</p> <p>C. In separate schools, residential facilities, or homebound/hospital placements.</p> <p>[Results Indicator]</p> | <p>ROP provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions. ROP indicated that stakeholders were provided an opportunity to comment on the targets for FFY 2011 and FFY 2012.</p> <p>ROP's FFY 2009 reported data for this indicator are:</p> <table border="1" data-bbox="550 678 1583 1154"> <thead> <tr> <th></th> <th><u>FFY 2008</u> <u>Data</u></th> <th><u>FFY 2009</u> <u>Data</u></th> <th><u>FFY 2009</u> <u>Target</u></th> <th><u>Progress</u></th> </tr> </thead> <tbody> <tr> <td>A. % Inside the regular class 80% or more of the day</td> <td align="center">34</td> <td align="center">40</td> <td align="center">38</td> <td align="center">6.00%</td> </tr> <tr> <td>B. % Inside the regular class less than 40% of the day</td> <td align="center">12</td> <td align="center">15</td> <td align="center">13</td> <td align="center">-3.00%</td> </tr> <tr> <td>C. % In separate schools, residential facilities, or homebound/hospital placements</td> <td align="center">3</td> <td align="center">2</td> <td align="center">3</td> <td align="center">1.00%</td> </tr> </tbody> </table> <p>These data represent progress for 5A and 5C and represent slippage for 5B from the FFY 2008 data. ROP met its FFY 2009 targets for 5A and 5C, but did not meet its FFY 2009 target for 5B.</p> | | <u>FFY 2008</u> <u>Data</u> | <u>FFY 2009</u> <u>Data</u> | <u>FFY 2009</u> <u>Target</u> | <u>Progress</u> | A. % Inside the regular class 80% or more of the day | 34 | 40 | 38 | 6.00% | B. % Inside the regular class less than 40% of the day | 12 | 15 | 13 | -3.00% | C. % In separate schools, residential facilities, or homebound/hospital placements | 3 | 2 | 3 | 1.00% | <p>OSEP appreciates ROP's efforts to improve performance and looks forward to ROP's data demonstrating improvement in performance in the FFY 2010 APR, due February 1, 2012.</p> |
| | <u>FFY 2008</u> <u>Data</u> | <u>FFY 2009</u> <u>Data</u> | <u>FFY 2009</u> <u>Target</u> | <u>Progress</u> | | | | | | | | | | | | | | | | | | |
| A. % Inside the regular class 80% or more of the day | 34 | 40 | 38 | 6.00% | | | | | | | | | | | | | | | | | | |
| B. % Inside the regular class less than 40% of the day | 12 | 15 | 13 | -3.00% | | | | | | | | | | | | | | | | | | |
| C. % In separate schools, residential facilities, or homebound/hospital placements | 3 | 2 | 3 | 1.00% | | | | | | | | | | | | | | | | | | |
| <p>6. Percent of children aged 3 through 5 with IEPs attending a:</p> <p>A. Regular early childhood program and receiving the majority of special education and related services in the regular early childhood program;</p> | <p>ROP is not required to report on this indicator in the FFY 2009 APR.</p> | <p>ROP is not required to report on this indicator in the FFY 2010 APR, due February 1, 2012.</p> | | | | | | | | | | | | | | | | | | | | |

Republic of Palau Part B FFY 2009 SPP/APR Response Table

| Monitoring Priorities and Indicators | Status of APR Data/SPP Revision Issues | OSEP Analysis/Next Steps | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|-----------------------------------|-------------------------------|-----------------------------|-------------------------------|--|-----|-----|-----|--|-----|-----|-----|---|-----|-----|-----|-----------------------------------|-----------------------------|-----------------------------|-------------------------------|--|-----|-----|-----|---|-----|----|-----|---|
| and B. Separate special education class, separate school or residential facility. [Results Indicator; New] | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7. Percent of preschool children age 3 through 5 with IEPs who demonstrate improved: A. Positive social-emotional skills (including social relationships); B. Acquisition and use of knowledge and skills (including early language/communication and early literacy); and C. Use of appropriate behaviors to meet their needs. [Results Indicator] | ROP provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions. ROP indicated that stakeholders were provided an opportunity to comment on the targets for FFY 2011 and FFY 2012. ROP's FFY 2009 reported data for this indicator are: <table border="1" data-bbox="550 646 1585 1489"> <thead> <tr> <th data-bbox="550 646 959 743"><u>Summary Statement 1</u></th> <th data-bbox="959 646 1163 743"><u>FFY 2008 Data</u></th> <th data-bbox="1163 646 1373 743"><u>FFY 2009 Data</u></th> <th data-bbox="1373 646 1585 743"><u>FFY 2009 Target</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="550 743 959 883">Outcome A: Positive social-emotional skills (including social relationships) (%)</td> <td align="center" data-bbox="959 743 1163 883">100</td> <td align="center" data-bbox="1163 743 1373 883">100</td> <td align="center" data-bbox="1373 743 1585 883">100</td> </tr> <tr> <td data-bbox="550 883 959 1052">Outcome B: Acquisition and use of knowledge and skills (including early language/ communication) (%)</td> <td align="center" data-bbox="959 883 1163 1052">100</td> <td align="center" data-bbox="1163 883 1373 1052">100</td> <td align="center" data-bbox="1373 883 1585 1052">100</td> </tr> <tr> <td data-bbox="550 1052 959 1156">Outcome C: Use of appropriate behaviors to meet their needs (%)</td> <td align="center" data-bbox="959 1052 1163 1156">100</td> <td align="center" data-bbox="1163 1052 1373 1156">100</td> <td align="center" data-bbox="1373 1052 1585 1156">100</td> </tr> <tr> <th data-bbox="550 1156 959 1253"><u>Summary Statement 2</u></th> <th data-bbox="959 1156 1163 1253"><u>FFY 2008 Data</u></th> <th data-bbox="1163 1156 1373 1253"><u>FFY 2009 Data</u></th> <th data-bbox="1373 1156 1585 1253"><u>FFY 2009 Target</u></th> </tr> <tr> <td data-bbox="550 1253 959 1393">Outcome A: Positive social-emotional skills (including social relationships) (%)</td> <td align="center" data-bbox="959 1253 1163 1393">100</td> <td align="center" data-bbox="1163 1253 1373 1393">100</td> <td align="center" data-bbox="1373 1253 1585 1393">100</td> </tr> <tr> <td data-bbox="550 1393 959 1489">Outcome B: Acquisition and use of knowledge and skills (including</td> <td align="center" data-bbox="959 1393 1163 1489">100</td> <td align="center" data-bbox="1163 1393 1373 1489">67</td> <td align="center" data-bbox="1373 1393 1585 1489">100</td> </tr> </tbody> </table> | <u>Summary Statement 1</u> | <u>FFY 2008 Data</u> | <u>FFY 2009 Data</u> | <u>FFY 2009 Target</u> | Outcome A: Positive social-emotional skills (including social relationships) (%) | 100 | 100 | 100 | Outcome B: Acquisition and use of knowledge and skills (including early language/ communication) (%) | 100 | 100 | 100 | Outcome C: Use of appropriate behaviors to meet their needs (%) | 100 | 100 | 100 | <u>Summary Statement 2</u> | <u>FFY 2008 Data</u> | <u>FFY 2009 Data</u> | <u>FFY 2009 Target</u> | Outcome A: Positive social-emotional skills (including social relationships) (%) | 100 | 100 | 100 | Outcome B: Acquisition and use of knowledge and skills (including | 100 | 67 | 100 | OSEP appreciates ROP's efforts to improve performance and looks forward to ROP's data demonstrating improvement in performance in the FFY 2010 APR, due February 1, 2012. ROP must report progress data and actual target data for FFY 2010 with the FFY 2010 APR. |
| <u>Summary Statement 1</u> | <u>FFY 2008 Data</u> | <u>FFY 2009 Data</u> | <u>FFY 2009 Target</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Outcome A: Positive social-emotional skills (including social relationships) (%) | 100 | 100 | 100 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Outcome B: Acquisition and use of knowledge and skills (including early language/ communication) (%) | 100 | 100 | 100 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Outcome C: Use of appropriate behaviors to meet their needs (%) | 100 | 100 | 100 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <u>Summary Statement 2</u> | <u>FFY 2008 Data</u> | <u>FFY 2009 Data</u> | <u>FFY 2009 Target</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Outcome A: Positive social-emotional skills (including social relationships) (%) | 100 | 100 | 100 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Outcome B: Acquisition and use of knowledge and skills (including | 100 | 67 | 100 | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| Monitoring Priorities and Indicators | Status of APR Data/SPP Revision Issues | | | | OSEP Analysis/Next Steps |
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| | early language/ communication) (%) | | | | |
| | Outcome C: Use of appropriate behaviors to meet their needs (%) | 100 | 67 | 100 | |
| | These data represent slippage or remain unchanged from the FFY 2008 data. ROP met part of its FFY 2009 targets for this indicator. | | | | |
| 8. Percent of parents with a child receiving special education services who report that schools facilitated parent involvement as a means of improving services and results for children with disabilities. [Results Indicator] | <p>ROP provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions. ROP indicated that stakeholders were provided an opportunity to comment on the targets for FFY 2011 and FFY 2012.</p> <p>ROP's FFY 2009 reported data for this indicator for children ages 3-5 are 88.92%. These data represent progress from the FFY 2008 data of 88.2%. ROP did not meet its FFY 2009 target of 94%.</p> <p>ROP's FFY 2009 reported data for this indicator for children ages 6-21 are 56%. These data represent progress from the FFY 2008 data of 39%. ROP met its FFY 2009 target of 44.56%.</p> | | | | OSEP appreciates ROP's efforts to improve performance and looks forward to ROP's data demonstrating improvement in performance in the FFY 2010 APR due February 1, 2012. |
| 9. Percent of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification. [Compliance Indicator] | Not applicable. | | | | Not applicable. |
| 10. Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification. [Compliance Indicator] | Not applicable. | | | | Not applicable. |
| 11. Percent of children who were evaluated within 60 days of | ROP provided targets for FFY 2011 and FFY 2012, and improvement activities through | | | | OSEP appreciates ROP's efforts in achieving compliance with the |

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| Monitoring Priorities and Indicators | Status of APR Data/SPP Revision Issues | OSEP Analysis/Next Steps |
|---|--|---|
| <p>receiving parental consent for initial evaluation or, if the State establishes a timeframe within which the evaluation must be conducted, within that timeframe.</p> <p>[Compliance Indicator]</p> | <p>FFY 2012, and OSEP accepts those revisions.</p> <p>ROP's FFY 2009 reported data for this indicator are 100%. These data remain unchanged from the FFY 2008 data of 100%. ROP met its FFY 2009 target of 100%.</p> | <p>timely initial evaluation requirements in 34 CFR §300.301(c)(1).</p> |
| <p>12. Percent of children referred by Part C prior to age 3, who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays.</p> <p>[Compliance Indicator]</p> | <p>Not applicable.</p> | <p>Not applicable.</p> |
| <p>13. Percent of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition services needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age</p> | <p>ROP provided FFY 2009 baseline data, targets for FFY 2010, FFY 2011, and FFY 2012, and improvement activities through FFY 2012 for this indicator, and OSEP accepts ROP's submission for this indicator.</p> <p>ROP's FFY 2009 reported baseline data for this indicator are 98%.</p> | <p>OSEP appreciates ROP's efforts and looks forward to reviewing in the FFY 2010 APR, due February 1, 2012, ROP's data demonstrating that it is in compliance with the secondary transition requirements in 34 CFR §§300.320(b) and 300.321(b). Because ROP reported less than 100% compliance for FFY 2009, ROP must report on the status of correction of noncompliance reflected in the data ROP reported for this indicator. If ROP does not report 100% compliance in the FFY 2010 APR, ROP must review its improvement activities and revise them, if necessary.</p> <p>When reporting on the correction of noncompliance reflected in the FFY 2009 data ROP reported for</p> |

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| Monitoring Priorities and Indicators | Status of APR Data/SPP Revision Issues | OSEP Analysis/Next Steps |
|--|--|--|
| <p>of majority. [Compliance Indicator]</p> | | <p>this indicator, ROP must report, in its FFY 2010 APR, that it: (1) is correctly implementing 34 CFR §§300.320(b) and 300.321(b) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within its jurisdiction, consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02). In the FFY 2010 APR, ROP must describe the specific actions that were taken to verify the correction.</p> |
| <p>14. Percent of youth who are no longer in secondary school, had IEPs in effect at the time they left school, and were:</p> <p>A. Enrolled in higher education within one year of leaving high school;</p> <p>B. Enrolled in higher education or competitively employed within one year of leaving high school.</p> <p>C. Enrolled in higher education or in some other postsecondary education or training program; or competitively employed or in some other employment within one year of leaving high school.</p> | <p>ROP provided FFY 2009 baseline data, targets for FFY 2010, FFY 2011, and FFY 2012, and improvement activities through FFY 2012 for this indicator, and OSEP accepts ROP’s submission for this indicator. ROP indicated that stakeholders were provided an opportunity to comment on the targets for FFY 2010, FFY 2011 and FFY 2012.</p> <p>ROP’s reported FFY 2009 baseline data for this indicator are:</p> <p>A. 11% enrolled in higher education within one year of leaving high school;</p> <p>B. 56% enrolled in higher education or competitively employed within one year of leaving high school; and</p> <p>C. 100% enrolled in higher education or in some other postsecondary education or training program; or competitively employed or in some other employment within one year of leaving high school.</p> | <p>ROP must report actual target data for FFY 2010 with the FFY 2010 APR, due February 1, 2012.</p> |

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| Monitoring Priorities and Indicators | Status of APR Data/SPP Revision Issues | OSEP Analysis/Next Steps |
|--|---|---|
| [Results Indicator] | | |
| <p>15. General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon as possible but in no case later than one year from identification.</p> <p>[Compliance Indicator]</p> | <p>ROP provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions.</p> <p>ROP's FFY 2009 reported data for this indicator are 100%. These data remain unchanged from the FFY 2008 data of 100%. ROP met its FFY 2009 target of 100%.</p> <p>ROP reported that all six of its findings of noncompliance identified in FFY 2008 were corrected in a timely manner.</p> | <p>OSEP appreciates ROP's efforts in timely correcting findings of noncompliance identified in FFY 2008.</p> <p>In reporting on correction of findings of noncompliance identified in FFY 2009 in the FFY 2010 APR, due February 1, 2012, ROP must report that it: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within its jurisdiction, consistent with OSEP Memo 09-02. In the FFY 2010 APR, ROP must describe the specific actions that were taken to verify the correction. In addition, in reporting on Indicator 15 in the FFY 2010 APR, ROP must use the Indicator 15 Worksheet.</p> <p>In responding to Indicator 13 in the FFY 2010 APR, ROP must report on correction of the noncompliance described in this table under that indicator.</p> |

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| <p>16. Percent of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint, or because the parent (or individual or organization) and the public agency agree to extend the time to engage in mediation or other alternative means of dispute resolution, if available in the State.</p> <p>[Compliance Indicator]</p> | <p>ROP provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions.</p> <p>ROP's FFY 2009 reported data for this indicator are 100%. These data are based on two complaints. ROP met its FFY 2009 target of 100%.</p> | <p>OSEP appreciates ROP's efforts in achieving compliance with the timely complaint resolution requirements in 34 CFR §300.152.</p> |
| <p>17. Percent of adjudicated due process hearing requests that were adjudicated within the 45-day timeline or a timeline that is properly extended by the hearing officer at the request of either party or in the case of an expedited hearing, within the required timelines.</p> <p>[Compliance Indicator]</p> | <p>ROP provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions. ROP reported that it did not receive any requests for due process hearings during the reporting period.</p> | <p>OSEP looks forward to reviewing ROP's data in the FFY 2010 APR, due February 1, 2012.</p> |
| <p>18. Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements.</p> <p>[Results Indicator]</p> | <p>ROP reported that no resolution sessions were held during the reporting period.</p> <p>ROP reported fewer than ten resolution sessions held in FFY 2009. ROP is not required to provide targets or improvement activities until any fiscal year in which ten or more sessions were held.</p> | <p>OSEP looks forward to reviewing ROP's data in the FFY 2010 APR, due February 1, 2012.</p> |
| <p>19. Percent of mediations held that resulted in mediation agreements.</p> <p>[Results Indicator]</p> | <p>ROP reported that no mediations were held during the reporting period.</p> <p>ROP reported fewer than ten mediations held in FFY 2009. ROP is not required to provide targets or improvement activities except in any fiscal year in which ten or more</p> | <p>OSEP looks forward to reviewing ROP's data in the FFY 2010 APR, due February 1, 2012.</p> |

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| | mediations were held. | |
| <p>20. State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.</p> <p>[Compliance Indicator]</p> | <p>ROP provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions.</p> <p>ROP's FFY 2009 reported data for this indicator are 100%. These data remain unchanged from the FFY 2008 data of 100%. ROP met its FFY 2009 target of 100%.</p> | <p>OSEP appreciates ROP's efforts in achieving compliance with the timely and accurate data reporting requirements in IDEA sections 616 and 618 and 34 CFR §§76.720 and 300.601(b). In reporting on Indicator 20 in the FFY 2010 APR, due February 1, 2012, ROP must use the Indicator 20 Data Rubric.</p> |

| Verification Issues | | |
|--|---|--|
| Critical Element | Issue/Response/Analysis | Action Required |
| <p>General Supervision Critical Element 1 (GS-1) Identification of Noncompliance</p> | <p>OSEP's verification letter, dated January 31, 2011, required ROP to provide a written assurance that it will: (1) provide training to staff on the LRE requirements in 34 CFR §300.114 (which incorporates 34 CFR §§300.115 – 300.120), and IEP content requirements in 34 CFR §300.320(a)(4) and (5), that emphasizes that special classes, separate schooling and/or removal of children with disabilities from the regular educational environment occurs only if the nature and severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily; and (2) implemented its biannual reviews of data from its database for all schools to identify noncompliance and document findings of noncompliance when the data demonstrate noncompliance.</p> <p>ROP provided the required documentation for each of the above on April 29, 2011.</p> | <p><u>No further action is required.</u></p> |
| <p>General Supervision Critical Element 2 (GS-2) Correction of Noncompliance</p> | <p>OSEP's verification letter, dated January 31, 2011, required ROP to provide a written assurance that it has written policies and procedures that require the correction in a timely manner of all noncompliance that is identified through its Offsite Data Review, consistent with OSEP Memo 09-02. In addition, ROP was required submit a plan to OSEP that ensures that the student specific noncompliance identified by OSEP will be corrected as soon as possible, but in no case later than one year from</p> | <p><u>No further action is required.</u></p> |

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| Verification Issues | | |
|---|---|---|
| Critical Element | Issue/Response/Analysis | Action Required |
| | <p>the date of the finding of noncompliance.</p> <p>On April 29, 2011, ROP provided the required written policies and procedures that require the correction in a timely manner of all noncompliance that it identified through its Offsite Data Review, consistent with OSEP Memo 09-02. In addition, ROP provided a plan and documentation that the student specific noncompliance identified by OSEP was corrected.</p> | |
| <p>General Supervision Critical Element 5 (GS-5) Implementation of Grant Assurances</p> <p>Interagency Agreements Between Each Public Agency and the State Educational Agency</p> | <p>OSEP's verification letter, dated January 31, 2011, required ROP to provide a copy of: (1) a signed revised agreement between the ROP Ministry of Education and Palau Head Start that meets the requirements in 34 CFR §300.154(a), including the establishment of financial responsibility and the resolution of disputes; (2) a signed agreement between the ROP Ministry of Education and the Workforce Investment Act Office that meets the requirements in 34 CFR §300.154(a); and (3) a signed agreement between the ROP Ministry of Education and the Ministry of Health that meets the requirements in 34 CFR §300.154(a).</p> <p>ROP provided the required signed agreements on April 29, 2011.</p> | <p><u>No further action is required.</u></p> |
| <p>Fiscal Systems Critical Element 1 Timely Obligation and Liquidation of Funds</p> | <p>OSEP's verification letter, dated January 31, 2011, required ROP to provide written policies and procedures that address the timely obligation and liquidation of funds under Part B of the IDEA consistent with 34 CFR §76.709 and §80.23(b) of the EDGAR.</p> <p>On April 29, 2011, ROP provided written policy and procedures (Ministry of Finance <i>Standard Operating Procedures for the Timely Obligation and Liquidation of Federal Grant Awards</i>, effective October 1, 2011) that address the timely obligation and liquidation of funds under Part B of the IDEA consistent with 34 §80.23(b) of the EDGAR. However, these procedures do not reflect the requirements in 34 CFR §76.709 related to carryover periods for grant funds as required in OSEP's verification letter.</p> | <p><u>Further action required:</u> within 30 days of the date of the Response Table, ROP is required to submit a revised Ministry of <i>Finance Standard Operating Procedures for the Timely Obligation and Liquidation of Federal Grant Awards</i> that reflects the requirements in 34 CFR §76.709.</p> |
| <p>Fiscal Systems Critical Element 3 Appropriate Use of IDEA Funds</p> | <p>OSEP's verification letter, dated January 31, 2011, required ROP to provide:</p> <p>(1) A copy of correspondence from the ROP to all ministries within the ROP that may make available financial support for special education and related services provided pursuant to a child's IEP, which includes: (a) an explanation of the requirement that the ROP include in its calculation of State financial support the amount of financial support provided by all ministries within the ROP, as required in section 612(a)(18)(A) of the</p> | <p><u>No further action is required.</u></p> |

Republic of Palau Part B FFY 2009 SPP/APR Response Table

| Verification Issues | | |
|----------------------------|--|------------------------|
| Critical Element | Issue/Response/Analysis | Action Required |
| | <p>IDEA and 34 CFR §300.163(a); (b) the name and contact information of an office within the ROP that is available to provide technical assistance to ministries within the ROP regarding this requirement; (c) the name and contact information of the office within the ROP to which ministries should provide information on the amount of financial support made available for special education and related services for children with IEPs; and (d) a copy of OSEP Memorandum 10-05;</p> <p>(2) A list of the names and addresses of the Ministries to which this correspondence was sent and the dates of distribution;</p> <p>(3) The procedures that the ROP uses to calculate maintenance of State financial support for special education and related services, including how the ROP ensures that it will not reduce the amount of State financial support for special education and related services for children with disabilities, below the amount of that support for the preceding fiscal year;</p> <p>(4) A written assurance that the ROP has utilized the methodology developed in accordance with item 1 above to calculate State financial support for special education and related services for fiscal year 2010 that is consistent with the requirements in 34 CFR §300.163(a); and</p> <p>(5) A copy of the correspondence in which the ROP has informed its audit office of the need to review the ROP’s compliance with the State financial support requirements in section 612(a)(18)(A) of the IDEA and 34 CFR §300.163(a) as part of any audit conducted under the Single Audit Act and OMB Circular A-133. In addition, OSEP required that ROP address the fiscal year 2009 finding related to the ROP’s maintenance of State financial support through the Department’s audit resolution process, and provide a summary of the audit finding, information related to corrective actions taken by the ROP to address the issues identified in the report.</p> <p>ROP provided the required documentation for each of the above on April 29, 2011.</p> | |