

**Republic of Palau FFY 2005 SPP/APR Response Table**

Monitoring Priorities and Indicators	Status	OSEP Analysis/Next Steps
<b>Monitoring Priority: FAPE in the LRE</b>		
<p>1. Percent of youth with individualized education programs (IEPs) graduating from high school with a regular diploma compared to percent of all youth in the State graduating with a regular diploma.</p> <p>[Results Indicator]</p>	<p>The Republic of Palau's (ROP) FFY 2005 reported data for this indicator are 15%, representing slippage from the FFY 2004 data of 23%. The ROP did not meet its FFY 2005 target of 25%.</p>	<p>The ROP revised the improvement activities for this indicator in its SPP and OSEP accepts those revisions.</p> <p>The ROP noted on page 7 of the APR that the Palau Ministry of Education (MOE) uses a cohort formula to determine the graduation rate of all students. "This formula only accounts for those students who enrolled in High School four years prior to their graduation date." The formula does not include repeaters (students who must take their freshman courses until they pass them). The ROP further noted that they would continue to use the cohort formula until the MOE makes changes. The ROP should report in the FFY 2006 APR, due February 1, 2008, an update on MOE's plans for changing the cohort formula to include repeaters.</p> <p>OSEP noted on page 9 of the revised SPP, submitted on February 1, 2007, that the ROP awards two types of diplomas. OSEP was unable to determine if graduation requirements were different for earning each diploma. In the FFY 2006 APR, the ROP must provide an explanation that addresses whether there are substantive differences in the two diplomas and the requirements for earning each diploma.</p> <p>OSEP looks forward to the ROP's data demonstrating improvement in performance in the FFY 2006 APR, due February 1, 2008.</p>
<p>2. Percent of youth with IEPs dropping out of high school compared to the percent of all youth in the State dropping out of high school.</p> <p>[Results Indicator]</p>	<p>The ROP FFY 2005 reported data for this indicator are 8%. The ROP met its FFY 2005 target of 20%.</p>	<p>The ROP revised the improvement activities for this indicator in its SPP and OSEP accepts those revisions.</p> <p>The ROP met its target and OSEP appreciates the ROP's efforts to improve performance.</p>
<p>3. Participation and performance of children with disabilities on statewide assessments:</p> <p>A. Percent of districts that have a disability subgroup that meets the State's minimum "n"</p>	<p>The reporting requirements for this indicator are not applicable to the ROP.</p>	<p>The requirements of this indicator are not applicable because the assessment requirements in Title I of the Elementary and Secondary Education Act do not apply to the ROP.</p>

Monitoring Priorities and Indicators	Status	OSEP Analysis/Next Steps
<p>size meeting the State's AYP objectives for progress for disability subgroup.</p> <p>[Results Indicator]</p>		
<p>3. Participation and performance of children with disabilities on statewide assessments:</p> <p>B. Participation rate for children with IEPs in a regular assessment with no accommodations; regular assessment with accommodations; alternate assessment against grade level standards; alternate assessment against alternate achievement standards.</p> <p>[Results Indicator]</p>	<p>The ROP's FFY 2005 reported data for this indicator are 85%. The ROP met its FFY 2005 target of 80%.</p>	<p>The ROP revised the improvement activities for this indicator in its SPP and OSEP accepts those revisions.</p> <p>OSEP's March 20, 2006 SPP response letter required the ROP to include in the APR, due February 1, 2007, data that demonstrate: (1) compliance with the requirements at 34 CFR §300.139 (now §300.160(a)) regarding the reporting of participation and performance of children with disabilities on the alternate assessment; and (2) compliance with the assessment requirements in 34 CFR §300.138 (now §300.160(f)) that an alternate assessment be made available and provided to children with disabilities who cannot participate in State and districtwide assessments. It was unclear that an alternate assessment portfolio was provided to the 14 students whose IEPs identified them for an alternate assessment.</p> <p>In its February 7, 2007 verification visit letter, OSEP noted that because the ROP does not report publicly on the assessment data of nondisabled children, it is not required to publicly report assessment data of children with disabilities. OSEP also noted that the alternate assessment was administered and scored for the 14 children who required one.</p> <p>OSEP considered the data reported on page 14 of the APR (85%) instead of the data on page 16 of the APR (70.97%). Based on the 85% participation rate, the ROP met the FFY 2005 target of 80%. The ROP must ensure that the calculations for this indicator are accurate in the FFY 2006 APR due February 1, 2008. OSEP looks forward to the ROP's data demonstrating improvement in performance in the FFY 2006 APR, due February 1, 2008.</p> <p>OSEP also noted discrepancies between page 14 of the APR and Table 6 (ROP's 618 data). On page 14 of the APR, the ROP reported that 62 children with disabilities had IEPs but in Table 6, the count is 52. On page 14 of the APR, the ROP reported that "9" students were absent; however, Table 6 shows no students were absent. In addition, on page</p>

Monitoring Priorities and Indicators	Status	OSEP Analysis/Next Steps
		<p>14 of the APR, the ROP reported that there were “9” children with IEPs who took the alternate assessment against grade level achievement standards, but Table 6 reported the number as “8.” In the FFY 2006 APR, due February 1, 2008, the ROP must ensure that its data for this indicator aligns with the data reported in Table 6.</p> <p>OSEP’s February 7, 2007 verification visit letter required the ROP to report by April 10, 2007: (1) current data and information on the administration and scoring of the Palau Achievement Test (PAT)-Alternate; and (2) data and information demonstrating the availability and provision of an alternate Quarterly Assessment to children with disabilities who cannot participate in statewide assessments as required by Part B of the IDEA.</p> <p>In the April 10, 2007 report, the ROP indicated that the pilot for the Alternate Quarterly Assessment was being implemented for students with significant cognitive disabilities during the 2006-2007 school year and would be scored during July 2007. The ROP reported that both alternate assessments will be fully implemented during the 2007-2008 school year.</p> <p>OSEP looks forward to the ROP’s data demonstrating improvement in performance in the FFY 2006 APR, due February 1, 2008.</p>
<p>3. Participation and performance of children with disabilities on statewide assessments:</p> <p>C. Proficiency rate for children with IEPs against grade level standards and alternate achievement standards.</p> <p>[Results Indicator]</p>	<p>The ROP’s FFY 2005 reported data for this indicator are 3%. This shows progress over the FFY 2004 baseline data of 0%. The State did not meet its FFY 2005 target of 35% (without accommodations) and 38% (with accommodations).</p>	<p>On page 14 of the FFY 2005 APR, the ROP reported that two children with IEPs in assessed grades were proficient on the alternate assessment against grade level achievement standards. The ROP, however, used the total number of children with IEPs in assessed grades (62 students) instead of the number of children with IEPs who took the alternate assessment against grade level standards (nine students). Using the number nine as the denominator, the percentage of children with IEPs in assessed grades who were proficient or above as measured on the alternate assessment against grade level achievement standards is .22% instead of 3%. On page 17, the ROP reported that of the nine students who took the alternate assessment, only seven students had enough data in their portfolios to be scored and, of those seven students, two students were proficient.</p> <p>On pages 14 and 17 of the FFY 2005 APR, the ROP reported that no children with IEPs in assessed grades met the 65% proficiency level on</p>

Monitoring Priorities and Indicators	Status	OSEP Analysis/Next Steps
		<p>the regular assessment, with or without accommodations. On page 16, however, the ROP reported that although no children with IEPs met the 65% proficiency level on the regular assessment, the average score of all students with IEPs who took the statewide assessment was 38.32% (without accommodations) and 39.87% (with accommodations), which exceeded the proposed target of 35% proficiency level and showed improvement from last year.</p> <p>The targets for this indicator appear to be based on an average score not on proficiency rates. The ROP must revise its targets to meet the requirements of this indicator and to more accurately reflect its data on proficiency. In addition, the instructions for this indicator require States to report proficiency rates by content area for each of the grades shown in Table 6 of the 618 data, and the ROP did not provide data by content area.</p> <p>The ROP must provide the required data in the FFY 2006 APR, due February 1, 2008.</p>
<p>4. Rates of suspension and expulsion:  A. Percent of districts identified by the State as having a significant discrepancy in the rates of suspensions and expulsions of children with disabilities for greater than 10 days in a school year; and  [Results Indicator]</p>	<p>The ROP's FFY 2005 reported data for this indicator are 0.</p>	<p>The ROP revised the improvement activities for this indicator in its SPP and OSEP accepts those revisions. OSEP noted that the ROP's proposed revision to the targets from zero to three percent is less rigorous and above the zero percent baseline. In addition, the APR did not indicate the level of stakeholder involvement regarding the revision of the targets for this indicator. The ROP also noted on page 21 of the FFY 2005 APR that, during the past five years, there were no suspensions or expulsions for children with disabilities. Based on the review of data and information reported for this indicator, OSEP has determined that the ROP must maintain the zero percent targets for FFY 2005 through 2010 for Indicator 4A.</p> <p>Although the ROP is a unitary system and there are no local educational agencies among which to compare data for this indicator, the ROP must report the data for its system as a whole. The ROP may choose to compare the rate of long-term suspensions and expulsions for children with disabilities to the rates for nondisabled children in order to determine whether significant discrepancies are occurring.</p> <p>OSEP looks forward to the ROP's continued performance in the FFY</p>

Monitoring Priorities and Indicators	Status	OSEP Analysis/Next Steps
		2006 APR, due February 1, 2008.
<p>4. Rates of suspension and expulsion:</p> <p>B. Percent of districts identified by the State as having a significant discrepancy in the rates of suspensions and expulsions of greater than 10 days in a school year of children with disabilities by race and ethnicity.</p> <p>[Results Indicator; New]</p>	Not applicable.	This indicator is not applicable to the ROP as the only racial/ethnic group present is Asian/Pacific Islander.
<p>5. Percent of children with IEPs aged 6 through 21:</p> <p>A. Removed from regular class less than 21% of the day;</p> <p>B. Removed from regular class greater than 60% of the day; or</p> <p>C. Served in public or private separate schools, residential placements, or homebound or hospital placements.</p> <p>[Results Indicator]</p>	<p>A. The State's FFY 2005 reported data of 18% represents slippage from the FFY 2004 data of 28%. The State did not meet its FFY 2005 target of 30%.</p> <p>B. The State's FFY 2005 reported data of 19% represents slippage from the FFY 2004 data of 15%. The State did not meet its FFY 2005 target of 15%.</p> <p>C. The State's FFY 2005 reported data are 3%. The State met its FFY 2005 target of 5%.</p>	<p>The ROP revised the improvement activities for this indicator in its SPP and OSEP accepts those revisions.</p> <p>The ROP met its target for 5C and OSEP looks forward to the ROP's data demonstrating improvement in performance in the FFY 2006 APR, due February 1, 2008.</p>
<p>6. Percent of preschool children with IEPs who received special education and related services in settings with typically developing peers (i.e., early childhood settings, home, and part-time early childhood/part-time early childhood special education settings).</p> <p>[Results Indicator]</p>	The State's FFY 2005 reported data for this indicator are 100%. The ROP met its 100% target for this indicator.	<p>The ROP revised the improvement activities for this indicator in its SPP and OSEP accepts those revisions.</p> <p>The ROP met its FFY 2005 target. Please note that, due to changes in the 618 State-reported data collection, this indicator will change for the FFY 2006 APR, due February 1, 2008. States will be required to describe how they will collect valid and reliable data to provide baseline and targets in the FFY 2007 APR, due February 1, 2009.</p>

<b>Monitoring Priorities and Indicators</b>	<b>Status</b>	<b>OSEP Analysis/Next Steps</b>
<p>7. Percent of preschool children with IEPs who demonstrate improved:</p> <p>A. Positive social-emotional skills (including social relationships);</p> <p>B. Acquisition and use of knowledge and skills (including early language/communication and early literacy); and</p> <p>C. Use of appropriate behaviors to meet their needs.</p> <p>[Results Indicator; New]</p>	<p>Entry data provided.</p>	<p>The ROP reported the required entry data and activities. The ROP must provide progress data and improvement activities with the FFY 2006 APR, due February 1, 2008.</p> <p>The ROP did not submit a definition of comparable to same-aged peers, which was required by the SPP/APR instructions to be included in the FFY 2005 APR. The ROP must include this information in the FFY 2006 APR, due February 1, 2008.</p>
<p>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.</p> <p>[Results Indicator; New]</p>	<p>The ROP's reported baseline data are 88% for parents of children ages 3-5 and 43% for parents of children ages 6-21.</p>	<p>The ROP provided baseline data, targets, and improvement activities and OSEP accepts the SPP for this indicator. The ROP included a copy of the survey for parents of children ages 3-5; however, a copy of the survey for parents of children ages 6-21 was not submitted.</p> <p>The ROP must submit a copy of the survey for parents of children ages 6-21 years in the FFY 2006 APR, due February 1, 2008.</p>
<b>Monitoring Priority: Disproportionality</b>		
<p>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.</p> <p>[Compliance Indicator; New]</p>	<p>Not applicable.</p>	<p>The requirements for this indicator are not applicable to the ROP as the only racial/ethnic group present is Asian/Pacific Islander. No further action required.</p>
<p>10. Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification.</p> <p>[Compliance Indicator; New]</p>	<p>Not applicable.</p>	<p>The requirements for this indicator are not applicable to the ROP as the only racial/ethnic group present is Asian/Pacific Islander. No further action required.</p>

<b>Monitoring Priority: Effective General Supervision</b>		
<p>11. Percent of children with parental consent to evaluate, who were evaluated within 60 days (or State-established timeline).</p> <p>[Compliance Indicator; New]</p>	<p>The ROP's FFY 2005 reported baseline data for this indicator are 67%.</p>	<p>The ROP provided baseline data, targets and improvement activities and OSEP accepts the SPP for this indicator. ROP reported data based on a State established timeline within which the evaluation must be conducted.</p> <p>OSEP looks forward to reviewing data in the FFY 2006 APR, due February 1, 2008, that demonstrate compliance with the requirements of 34 CFR §300.301(c), including data demonstrating correction of the noncompliance identified in FFY 2005.</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>The requirements for this indicator are not applicable because the ROP does not receive IDEA Part C or 619 funds. No further action required.</p>
<p>13. Percent of youth aged 16 and above with an IEP that includes coordinated, measurable, annual IEP goals and transition services that will reasonably enable the student to meet the post-secondary goals.</p> <p>[Compliance Indicator; New]</p>	<p>The ROP's FFY 2005 reported baseline data for this indicator are 49%.</p>	<p>The ROP provided baseline data, targets and improvement activities and OSEP accepts the SPP for this indicator.</p> <p>OSEP looks forward to reviewing data in the FFY 2006 APR, due February 1, 2008 that demonstrate compliance with the requirements of 34 CFR §300.320(b), including data demonstrating correction of the noncompliance identified in FFY 2005.</p>
<p>14. Percent of youth who had IEPs, are no longer in secondary school and who have been competitively employed, enrolled in some type of post-secondary school, or both, within one year of leaving high school.</p> <p>[Results Indicator; New]</p>	<p>The ROP provided a plan that describes how data will be collected.</p>	<p>The ROP provided a plan that describes how data are to be collected. The ROP must provide baseline data, targets, and improvement activities with the FFY 2006 APR, due February 1, 2008.</p> <p>The ROP did not include a definition of competitive employment or post-secondary school as required in the instructions for this indicator. The ROP must submit this information in the FFY 2006 APR, due February 1, 2008.</p>
<p>15. General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon</p>	<p>The ROP did not report FFY 2005 data for this indicator.</p>	<p>The ROP reported that no comparison/actual target data were available for FFY 2005-2006 because no monitoring was conducted during the 2004-2005 school year.</p>

as possible but in no case later than one year from identification.

[Compliance Indicator]

The ROP revised the improvement activities for this indicator in its SPP and OSEP accepts those revisions.

OSEP's March 20, 2006 SPP response letter required the ROP in the FFY 2005 APR, due February 1, 2007, to: (1) include targets and activities, with timelines and resources that would enable it to identify and correct noncompliance regarding the general supervision requirement and the dispute resolution process; (2) submit by April 14, 2006 a final report that includes: (a) information on how systemic issues are corrected related to the requirements at 34 CFR §300.600 (now §300.149); and (b) clarify if the ROP considers areas in need of improvement as systemic areas of noncompliance requiring correction within one year of identification; (3) demonstrate compliance with the requirement at 34 CFR §300.300 (now §300.101) regarding the provision of FAPE to incarcerated youth with disabilities; and (4) demonstrate compliance with the child find requirement at 34 CFR §300.125 (now §300.111) by providing information regarding the status of acquiring early childhood assessment tools, training of staff on the new assessment tools, and translating and disseminating the early childhood materials.

OSEP's February 7, 2007 verification visit letter required the ROP to demonstrate compliance with the remaining areas identified by OSEP in the March 20, 2006 SPP response letter by April 10, 2007 and: (1) submit either documentation that its general supervision system identifies noncompliance with Part B requirements within one year of identification; OR a plan to revise its monitoring system to ensure it is effective in identifying noncompliance with Part B requirements within one year of identification no later than February 1, 2008; (2) submit either documentation that its general supervision system corrects noncompliance with Part B requirements through monitoring OR a plan to revise its monitoring system to ensure it is effective in correcting noncompliance with Part B requirements no later than February 1, 2008; (3) provide a copy of the amended *Monitoring Procedures* that includes a description and criteria for determining: (a) when the activities in the school improvement plan have been completed and the area of noncompliance has been corrected; and (b) areas of noncompliance as distinguished from areas for improvement; (4) submit a draft copy of ROP's dispute resolution procedures; (5) submit a revised memorandum of understanding (MOU) that addresses the requirements in 34 CFR §300.142(a)(1) and (2) (now



		<p>§300.154)(a)(1) and (2)); (6) submit information on the status of hiring a physical therapist to meet the requirements at 34 CFR §300.101; and (7) submit current data on the administration and scoring of the alternate assessment required in Indicator 3. During OSEP's verification visit, the ROP provided information that met the child find requirements referenced in OSEP's March 20, 2006 SPP response letter.</p> <p>The ROP's April 10, 2007 response to OSEP's verification visit letter provided sufficient information for #4, #5, #6, and #7 above. The ROP must include a copy of the signed MOU with the FFY 2006 APR, due February 1, 2008.</p> <p>With regard to items #1 and #2 above, the ROP's April 10, 2007 report included a copy of interim Monitoring Procedures, revised January 2007, as part of a plan for reviewing the ROP's general supervision system and updating special education policies and procedures. It appears from the Monitoring Procedures that the ROP's general supervision system has mechanisms in place to identify noncompliance. According to the Monitoring Procedures, the monitoring team makes a determination of compliance with the IDEA and the school's status (in compliance, needs improvement, needs intervention, or needs substantial intervention) and the compliance review team issues a Compliance Review Report citing areas of noncompliance and works with the school to develop a School Improvement Plan (SIP). Although the procedures state that a monitor will schedule periodic visits to verify the implementation of the SIP, it is unclear how the ROP determines when the identified noncompliance has been corrected. The ROP must ensure that this issue is addressed in the final copy of the ROP <i>Monitoring Procedures</i> to be submitted with the FFY 2006 APR, due February 1, 2008.</p> <p>The ROP must review its improvement strategies and revise them, if appropriate, to ensure that they will enable the ROP to include data in the FFY 2006 APR, due February 1, 2008, that demonstrate compliance with the requirements of 20 U.S.C. 1232d(b)(3)(E) and 34 CFR §§300.149 and 300.600, including data on the correction of outstanding noncompliance identified in FFY 2004. In its response to Indicator 15, in the FFY 2006 APR, due February 1, 2008, the ROP must disaggregate by APR indicator the status of timely correction of the noncompliance findings identified by the ROP during FFY 2005.</p>
--	--	--

		In addition, the ROP must, in responding to Indicators 11 and 13, specifically identify and address the noncompliance identified in this table under those indicators.
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. [Compliance Indicator]	The ROP's FFY 2005 reported data for this indicator are 100%. The ROP met the 100% target for this indicator.	The ROP met its target and OSEP appreciates the ROP's efforts in achieving compliance.  OSEP's March 20, 2006 SPP response letter required the ROP to submit procedures for investigating and resolving formal written complaints in accordance with 34 CFR §§300.151-300.153 (formerly §§300.660-300.662). In its February 7, 2007 verification visit letter, OSEP required the ROP to provide to OSEP by April 10, 2007, a draft copy of the "Procedures for the Resolution of Disputes in Special Education (MOE Republic of Palau)." As indicated in Indicator 15, with its April 10, 2007 submission, the ROP provided OSEP a copy of its draft procedures, which address the dispute resolution requirements. A copy of the final procedures must be submitted with the FFY 2006 APR, due February 1, 2008.
17. Percent of fully adjudicated due process hearing requests that were fully adjudicated within the 45-day timeline or a timeline that is properly extended by the hearing officer at the request of either party. [Compliance Indicator]	The ROP met the 100% target for this indicator.	The ROP met the FFY 2005 target and OSEP appreciates the ROP's efforts in achieving compliance.  OSEP's March 20, 2006 SPP response letter required the ROP to demonstrate in the APR, due February 1, 2007 that a tracking system is in place for ensuring that due process hearings timelines are met and qualified hearing officers are hired by June 2006. The ROP provided the required information during OSEP's October 2006 verification visit.
18. Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements. [Results Indicator; New]	Not applicable.	The ROP is not required to provide baseline, targets or improvement activities until any FFY in which 10 or more resolution meetings were held. OSEP noted that the ROP provided improvement activities and OSEP accepts the SPP for this indicator.
19. Percent of mediations held that resulted in mediation agreements. [Results Indicator]	Not applicable.	OSEP's March 20, 2006 SPP response letter required the ROP to demonstrate in the APR, due February 1, 2007, that qualified mediators have been hired to meet the requirements at 34 CFR §300.506(b)(1)(iii) and (2)(i). OSEP also informed the ROP that it may remove the targets and improvement activities related to mediation in the APR, due February 1, 2007, if the number of

		<p>mediations for 2004-2005 is less than 10.</p> <p>During the verification visit, the ROP reported that four qualified mediators were hired in September 2006. This compliance was acknowledged in OSEP's February 2007 verification letter.</p> <p>The ROP is not required to provide baseline, targets or improvement activities until any FFY in which 10 or more mediations were held. OSEP noted that the ROP provided improvement activities and OSEP accepts the SPP for this indicator.</p>
<p>20. State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.</p> <p>[Compliance Indicator]</p>	<p>The ROP's reported data for this indicator are 100%.</p>	<p>OSEP's March 20, 2006 SPP response letter required the ROP to include in the FFY 2005 APR, how it is addressing "glitches" in the data collection system and how the "glitches" are impacting the accurate and timely reporting of the ROP's section 618 data submission to OSEP. As reported in the FFY 2005 APR and the ROP's February 7, 2007 verification visit letter, the ROP currently has methods in place, through Excel, to ensure the accurate and timely reporting of 618 data.</p> <p>On pages 86 of the SPP and 40 of the APR, the ROP noted that timely and accurate 618 data are reported prior to the annual due dates; and that previous APRs were submitted with accurate annual and trend data.</p> <p>The ROP must provide data in the FFY 2006 APR due February 1, 2008, that demonstrate compliance with the requirements in IDEA section 618 and 34 CFR §76.720 and 300.601(b).</p>