

Republic of the Marshall Islands (RMI) Part B FFY 2005 SPP/APR Response Table

Monitoring Priorities and Indicators	Status	OSEP Analysis/Next Steps
Monitoring Priority: FAPE in the LRE		
<p>1. Percent of youth with 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>RMI's FFY 2005 reported data for this indicator are 33.3%. This represents slippage from FFY 2004 data of 50%. RMI did not meet its FFY 2005 target of 50%.</p>	<p>RMI revised the improvement activities for this indicator in its FFY 2005 APR and OSEP accepts those revisions. The revised improvement activities must be added to the SPP.</p> <p>Since RMI indicated it is revising the criteria for high school admission, OSEP's March 29, 2006 SPP response letter required RMI to review its activities to determine if additional activities are needed, or if the activities need to be revised or modified to have the desired effect. RMI revised the improvement activities in the FFY 2005 APR. OSEP looks forward to RMI'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>RMI's FFY 2005 reported data for this indicator are 11%. RMI met its FFY 2005 target of 45%.</p>	<p>RMI revised the improvement activities for this indicator in its FFY 2005 APR and OSEP accepts those revisions. RMI must add the revised improvement activities to the SPP.</p> <p>OSEP's March 29, 2006, SPP response letter required RMI to include in the FFY 2005 APR, due February 1, 2007, a narrative describing what counts as "dropping out" for all youth and, if different, what counts as dropping out for youth with IEPs and, if there is a difference, an explanation of why there is a difference. If appropriate, OSEP required RMI to revise its baseline data, targets and improvement activities consistent with what counts as dropping out of high school. In the FFY 2005 APR, RMI stated that it uses the National Center for Educational Statistics' definitions for reporting drop-out rates for children with and without disabilities who enter high school by passing the high school entrance test. RMI revised the measurement in its targets for this indicator to clarify that the drop-out rate for youth with disabilities is comparable to the drop-out rate for students without disabilities. Using the revised measurement, the baseline data for FFY 2004 is 50%.</p> <p>RMI met its target and OSEP appreciates RMI's efforts to improve</p>

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<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” size meeting the State’s AYP objectives for progress for disability subgroup.</p> <p>[Results Indicator]</p>	<p>Not applicable.</p>	<p>performance.</p> <p>Indicator 3A is not applicable because the assessment requirements in Title I of the Elementary and Secondary Education Act do not apply to RMI.</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 State’s FFY 2005 reported data for this indicator are 27.8%. This represents slippage from RMI’s FFY 2004 reported data of 88%. RMI did not meet its FFY 2005 target of 90%.</p>	<p>RMI revised the improvement activities for this indicator in its FFY 2005 APR and OSEP accepts those revisions. RMI must add the revised improvement activities to the SPP.</p> <p>RMI is piloting a new national assessment system, and RMI must provide the required data in the FFY 2006 APR, due February 1, 2008.</p> <p>OSEP’s March 29, 2006 SPP response letter required RMI to include in the FFY 2005 APR, due February 1, 2007, information clarifying whether it conducts alternate assessments for all nationwide assessments. In the FFY 2005 APR, RMI reported that its nationwide assessments are still under development and that Grades 3, 6 and 8 were included in a pilot of the RMI Standard Achievement Test (MISAT). RMI did note, however, that except for Grade 8, not all schools and not all students in grades 3 and 6 participated in the pilot. RMI stated that the current alternate assessment guidelines are being reviewed and revised as part of the General Supervision Enhancement Grant (GSEG) Project that OSEP awarded to the Pacific entities. The Grade 8 MISAT will continue to serve as the high school entrance exam until 8th graders can enter high school without examination, at which time, the Grade 8 MISAT will become a statewide assessment similar to grades 3 and 6 and alternate assessments will also be provided to the grade 8 assessment tool.</p> <p>OSEP’s February 9, 2007 verification visit letter required RMI to submit with the FFY 2005 APR, a written plan to meet the requirements in 20 U.S.C. 1412(a)(16)(C) with respect to conducting alternate assessments for the eighth grade MISAT. RMI’s April 3, 2007 response to OSEP’s verification letter stated that RMI will conduct alternate assessments for the</p>

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		<p>eighth grade MISAT by February 1, 2008 and will submit the documentation in the FFY 2006 APR. RMI also reported that it had decided not to administer the MISAT in Grades 3 and 6 during 2006-2007.</p> <p>OSEP looks forward to reviewing RMI's data 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>RMI's FFY 2005 reported data for this indicator are 5.7%. This represents slippage from RMI's FFY 2004 data of 24%. RMI did not meet its FFY 2005 target of 25%.</p>	<p>RMI revised the improvement activities for this indicator in its FFY 2005 APR and OSEP accepts those revisions. The revised activities must be added to the SPP.</p> <p>RMI is piloting a new national assessment system, and RMI must provide the required data in the FFY 2006 APR, due February 1, 2008.</p> <p>OSEP's February 9, 2007 verification visit letter required RMI to keep OSEP informed about its progress in implementing its Comprehensive System of Personnel Development Plan (CSPD plan) to increase the number of qualified teachers, which RMI identified as a strategy for improving student proficiency scores. On page 11 of the FFY 2005 APR, RMI discussed its plan for increasing the level of formal education provided for teachers and for providing teacher training. OSEP looks forward to reviewing RMI's progress in implementing its CSPD plan in the FFY 2006 APR, due February 1, 2008.</p>
<p>4. Rates of suspension and expulsion:</p> <p>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</p> <p>[Results Indicator]</p>	<p>RMI's FFY 2005 reported data for this indicator are 0%. RMI met its target of 0%.</p>	<p>RMI revised the improvement activities in its SPP and OSEP accepts those revisions.</p> <p>RMI reported that no child with an IEP was suspended or expelled from school during FFY 2005.</p>
<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</p>	<p>Racial/ethnic composition not applicable.</p>	<p>This indicator is not applicable to RMI as the only racial/ethnic group present is Asian/Pacific Islander.</p>

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<p>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>		
<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. RMI's FFY 2005 reported data for Indicator 5A are 72.8%. This represents slippage from the FFY 2004 data of 98.7%. RMI did not meet its FFY 2005 target of 98%.</p> <p>B. RMI's FFY 2005 reported data for Indicator 5B are 26.2%. This represents slippage from the FFY 2004 data of 1.3%. RMI did not meet its FFY 2005 target of 2%.</p> <p>C. RMI's FFY 2005 reported data for Indicator 5C are 1%. This represents slippage from the FFY 2004 data of 0%. RMI did not meet its FFY 2005 target of 0%.</p>	<p>RMI revised the target for Indicator 5A for FFY 2006 and OSEP accepts the revision. RMI must add the revised target for FFY 2006 for Indicator 5A to the SPP.</p> <p>OSEP looks forward to RMI's data demonstrating improvement of 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>RMI's FFY 2005 reported data for this indicator are 100%. RMI met its FFY 2005 target of 100%.</p>	<p>RMI revised the improvement activities for this indicator and OSEP accepts those revisions. RMI must add these improvement activities to the SPP.</p> <p>RMI met its target, and OSEP appreciates RMI's efforts.</p> <p>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</p>

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[Results Indicator]		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>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>RMI did not report entry data for this indicator.</p>	<p>RMI did not report the required entry data. RMI reported in the FFY 2005 APR that it would report baseline data by February 1, 2008. RMI must provide the required progress data and improvement activities in the FFY 2006 APR, due February 1, 2008.</p> <p>OSEP’s March 29, 2006 SPP response letter required RMI to review, and if necessary revise, its targets for Indicator 7 in the APR, due February 1, 2007, after collecting and analyzing data for this indicator. In its FFY 2005 SPP revisions, RMI deleted the targets for this indicator.</p> <p>RMI did not submit a definition of “comparable to same-aged peers” that the SPP/APR instructions for this indicator required States and territories to include in the FFY 2005 APR, due February 1, 2007. RMI must submit the required 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>RMI’s FFY 2005 baseline data for this indicator are 92%.</p>	<p>RMI provided baseline data, targets and improvement activities and OSEP accepts the SPP for this indicator.</p>
Monitoring Priority: Disproportionality		
<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>This indicator is not applicable to RMI because the only racial/ethnic group present is Asian/Pacific Islander.</p>
<p>10. Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result</p>	<p>Not applicable.</p>	<p>This indicator is not applicable to RMI because the only racial/ethnic group present is Asian/Pacific Islander.</p>

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<p>of inappropriate identification.</p> <p>[Compliance Indicator; New]</p>		
Monitoring Priority: Effective General Supervision		
<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>RMI's FFY 2005 baseline data is for this indicator are 100%.</p>	<p>RMI provided baseline data, targets and improvement activities and OSEP accepts the SPP for this indicator. RMI reported data based on a State-established timeframe 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 continued compliance with the requirements of 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>RMI is not an eligible applicant under the Part C program.</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>RMI's FFY 2005 reported baseline data for this indicator are 77.9%.</p>	<p>RMI provided baseline data, targets and improvement activities on page 30 of the SPP 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 in 34 CFR §300.320(b), including data demonstrating correction of 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>RMI provided a plan that describes how data will be collected.</p>	<p>RMI provided a plan that describes how the data will be collected. RMI must provide baseline data, targets, and improvement activities with the FFY 2006 APR, due February 1, 2008.</p> <p>RMI did not submit definitions for "competitive employment" and "post-secondary education" that the instructions for the SPP/APR required States and territories include in the FFY 2005 APR, due February 1, 2007. RMI must submit this information in the FFY 2006 APR, due February 1, 2008.</p>

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<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>RMI's FFY 2005 reported data for this indicator are 100%. During the verification visit, however, OSEP was unable to conclude that RMI's general supervision system is reasonably designed to ensure the identification and timely correction of noncompliance.</p>	<p>RMI revised the improvement activities for this indicator in its APR and OSEP accepts those revisions. RMI must add these activities to the SPP.</p> <p>OSEP's March 29, 2006 SPP response letter required RMI to include in the FFY 2005 APR, due February 1, 2007, data and analysis on the number of children with disabilities in the 9 to 11 age range served under Part B of IDEA, in accordance with the requirements at 34 CFR §300.125 (now 34 CFR §300.111) and §300.300(a) (now 34 CFR §300.101(a)) along with a determination of compliance or noncompliance with those requirements. On page 31 of the FFY 2005 APR, RMI provided data and information addressing this issue and concluded that the data suggests compliance with the Part B requirements. OSEP accepts RMI's analysis. No further action is required.</p> <p>OSEP's March 29, 2006 SPP response letter also required RMI to include in the FFY 2005 APR, due February 1, 2007, a copy of its revised monitoring procedures, including procedures for correcting noncompliance as soon as possible and no later than one year from identification. OSEP's February 9, 2007 verification visit letter required RMI to provide OSEP within 60 days of the date of OSEP's verification letter: (a) documentation that its monitoring system is effective in identifying deficiencies with Part B requirements and findings of noncompliance with Part B requirements; or (b) a plan to revise its monitoring system to ensure that it is effective in identifying noncompliance with Part B requirements no later than February 1, 2008, the due data for the FFY 2006 APR.</p> <p>OSEP's verification visit letter also required RMI to provide in the FFY 2006 APR, due February 1, 2008, data demonstrating that it is RMI's practice to require the correction of identified noncompliance as soon as possible, and in no case later than one year from the date of identification of noncompliance through monitoring.</p> <p>With the FFY 2005 APR, RMI submitted its Continuous Improvement Focused Monitoring System (CIFMS) and On-Site Monitoring Procedures dated November 2006. Part I, Section E (CIFMS)) and Part II, Section C (On-Site Monitoring) of the monitoring procedures stated that, "Any citation of noncompliance must be corrected as soon as possible, but no later than one year from the date when the noncompliance was identified." RMI's April 3,</p>

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		<p>2007 response to OSEP’s verification visit letter stated that RMI is expanding and refining the November 2006 interim monitoring procedures and plans to use the Related Requirements in making determinations of compliance and noncompliance. RMI is working with the Western Regional Resource Center and the National Center on Special Education Accountability Monitoring to articulate more comprehensive and integrated monitoring procedures. RMI stated that the draft of the system and monitoring procedures will be completed by June 30, 2007. In the FFY 2006 APR, due February 1, 2008, RMI must submit data demonstrating that its monitoring system: (a) is effective in identifying deficiencies with Part B requirements and findings of noncompliance with Part B requirements; and (b) includes correction of identified noncompliance as soon as possible, but in no case later than one year from the date of identification of noncompliance through monitoring. RMI must submit its updated monitoring procedures with the FFY 2006 APR, due February 1, 2008.</p> <p>RMI reported in the FFY 2005 APR that no noncompliance was cited through the monitoring system, but areas of improvements were identified in each of the 16 schools monitored. RMI did not break down this data by indicator or substantive finding area. RMI’s difficulty in identifying noncompliance is addressed in OSEP’s verification visit letter. RMI’s April 3, 2007 response to OSEP’s verification visit letter reported that the November 2006 interim monitoring procedures addressed the concerns regarding identification of noncompliance and that it will revise its monitoring system to ensure it is effective in identifying noncompliance with Part B requirements no later than February 1, 2008. Although RMI reported that it met its target of 100%, it appears that RMI was using its old monitoring system to monitor during this time, which OSEP has determined does not sufficiently identify noncompliance.</p> <p>OSEP looks forward to reviewing data in the FFY 2006 APR, due February 1, 2008, that demonstrate compliance with the requirements in 20 U.S.C. 1232d(b)(3)(E), and 34 CFR §§300.149 and 300.600. In its response to Indicator 15 in the FFY 2006 APR, due February 1, 2008, RMI must disaggregate by APR indicator the status of timely correction of the noncompliance findings identified by the State during FFY 2005. In addition, the State must, in responding to Indicator 13, specifically identify</p>

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		and address the noncompliance identified in this table under that indicator.
<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.</p> <p>[Compliance Indicator]</p>	<p>There were no written complaints in FFY 2005.</p>	<p>OSEP's February 9, 2007 verification visit letter required RMI to include its updated complaint procedures in the FFY 2005 APR, due February 1, 2007. On page 34 of the FFY 2005 APR, RMI stated that it has adopted the model Procedural Safeguards Notice developed by OSEP and has been giving parents copies in the English version with consent for evaluation and with annual IEP meeting notices. A translation will be completed in Marshallese by June 30, 2007.</p>
<p>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.</p> <p>[Compliance Indicator]</p>	<p>There were no requests for due process hearings in FFY 2005.</p>	<p>OSEP's February 9, 2007 verification visit letter required RMI to include RMI's due process procedures in the FFY 2005 APR, due February 1, 2007. On page 34 of the FFY 2005 APR, RMI stated that it has adopted the model Procedural Safeguards Notice developed by OSEP and has been giving parents copies in the English version with consent for evaluation and with annual IEP meeting notices. A translation will be completed in Marshallese by June 30, 2007.</p>
<p>18. Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements.</p> <p>[Results Indicator; New]</p>	<p>Not applicable because RMI reported fewer than 10 due process hearing requests that went to resolution received in FFY 2005.</p>	<p>RMI is not required to provide baseline, targets or improvement activities until any FFY in which 10 or more resolution meetings were held.</p>
<p>19. Percent of mediations held that resulted in mediation agreements.</p> <p>[Results Indicator]</p>	<p>Not applicable because RMI reported fewer than 10 mediations requested in FFY 2005.</p>	<p>RMI is not required to provide or meet its targets or provide improvement activities until any FFY in which 10 or more mediations were conducted.</p> <p>OSEP's February 9, 2007 verification visit letter required RMI to include RMI's mediation procedures in the FFY 2005 APR, due February 1, 2007. On page 34 of the FFY 2005 APR, RMI stated that it has adopted the model Procedural Safeguards Notice developed by OSEP and has been giving parents copies in the English version with consent for evaluation and with annual IEP meeting notices. A translation will be completed in Marshallese by June 30, 2007.</p>
<p>20. State reported data (618) and State Performance Plan and Annual Performance</p>	<p>RMI's FFY 2005 reported data for this indicator are 95%. This represents</p>	<p>OSEP's February 9, 2007 verification visit letter required RMI to include in the FFY 2005 APR, due February 1, 2007, information about its progress to implement procedures for collecting and reporting data. In response to this</p>

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<p>Report) are timely and accurate.</p> <p>[Compliance Indicator]</p>	<p>slippage from the FFY 2004 data of 100%. RMI did not meet its FFY 2005 target of 100%.</p>	<p>request, RMI provided its administrative targets for collecting and reporting timely, accurate data on page 40 of the FFY 2005 APR. OSEP appreciates this information and looks forward to reviewing information about RMI's progress in implementing its system for collecting and reporting timely and accurate data in the FFY 2006 APR, due February 1, 2008.</p> <p>On page 39 of the FFY 2005 APR, RMI noted that its "reports," while submitted timely, required subsequent corrections and clarification. Also, RMI did not submit the required entry data for Indicator 7 in the FFY 2005 APR. OSEP appreciates RMI's efforts and looks forward to receiving data in the FFY 2006 APR, due February 1, 2008, that demonstrate compliance with the requirements of the IDEA section 618 and 34 CFR §§76.720 and 300.601(b).</p>