

Management audit and functional analysis report Pohnpei State Department of Education

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**Prepared for
FSM National Department of Education
Palikir
Federated States of Micronesia**

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T ABLE OF CONTENTS

	<u>Page</u>
Acknowledgements	6
Abbreviations	7
Executive Summary	8
Summary of Recommendations.	10
Introduction	14
Background	14
Scope of Audit	14
General Scope of Work	14
Primary and Secondary Objectives	15
Methodology	15
Structure of Audit Report	16
Organizational Profile	18
Section One: Category 1 – Strategic Management Compliance	21
Mission, Goals and Policy	21
Audit Table 1	
Responsibility and authority of the State Director of Education	31
Audit Table 2	
Education System – Role of Administration of DOE	36
Audit Table 3	
Organization of the Department of Education	40
Audit Table 4	

State Board of Education	42
Audit Table 5											
Language Commission	47
Audit Table 6											
Employment Practices	50
Audit Table 7											
Assignments of Personnel	55
Audit Table 8											
Services for Children with Disabilities	65
Audit Table 9											
Services for Gifted and Talented students	70
Audit Table 10											
Public Reporting	71
Audit Table 11											
Role of the Community	73
Audit Table 12											
Strategic Planning	76
Audit Table 13											
Early Childhood Education	79
Audit Table 14											
Section Two: Category 2 –Pedagogy Compliance	87
Curriculum and Instruction	87
Audit Table 15											
Staff Development	92
Audit Table 16											
Testing Program	95
Audit Table 17											
State Scholarship and Loan Fund	97
Audit Table 18											

Section Three: Category 3 – Administration Compliance	101
Scholarship Board Audit Table 19	101
Private Schools Audit Table 20	102
Hiring of Special Instructors Audit Table 21	105
Fiscal Planning and Accounting Systems Audit Table 22	107
Recruitment Audit Table 23	111
Personnel Performance Evaluation Audit Table 24	115
Penalty Sanctions Audit Table 25	120
School Administration, Policy and Procedures Audit Table 26	123
Employee Regulations for assignment, transfer, leave and paid positions Audit Table 27	125
Supplies, Equipment and Vehicles Audit Table 28	127
Food Services Audit Table 29	131
Conclusion	134
Attachments	135

Attachment No.

1 Table of ALL Performance indicators

- 2 List of DOE persons interviewed
- 3 List of documents sourced
- 6 FSM Census Date - 2000

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The audit undertaken was extensive and involved interviewing during workshops focus groups and one on one interviews with over 180 employees who generously and unreservedly gave their time to meet with the auditor and honestly and openly discuss the critical imperatives regarding the delivery of education services to the State Education Community. Many of the Education employees graciously availed themselves on frequent occasions and participated in follow up discussions and further responses to questions. As there are too many to name individually in this section of the report, the auditor would like to take this opportunity to offer sincerest thanks for your time and efforts. *(A list of persons interviewed appears in the attachment section of this report).*

Special thanks are extended to Director Mr. Joseph Villazon of Pohnpei State Department of Education. Without his continued support and assistance, the assignment of undertaking and completing this audit would have been considerably more challenging.

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Donna Wrembeck

ABBREVIATIONS

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
FSM	Federated States of Micronesia
HESA	Department of Health, Education and Social Affairs
JEMCO	Joint Economic Management Committee
PLPT	Pohnpei Language Proficiency Test
MA/MS	Master of Arts / Master of Science Degree
MRC	Management Review Council
NBC	New Baseline Curriculum
NDOE	National Department of Education
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
SCL	State Code of Laws (Pohnpei 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
WASC	Western Association of Schools and Colleges
WD &ST	Work Development and Skills Training

EXECUTIVE SUMMARY

Within the education sector in the Federated States of Micronesia (FSM), the Pohnpei Department of Education (DOE) is the largest of all state educational organizations. Its annual budget is about \$12 Million. The department employs 781 people (about 574 are teachers), and consists of thirty-one (31) Elementary Schools and three (3) High Schools catering to the educational needs of just under 10,300 students from Early Childhood Educational (ECE) level to Grade 12.

The fact that Pohnpei State DOE is the largest educational department within FSM, contributes to the complexities of administering all departmental operations. Five schools are located on outer islands. Difficulties in communications and close interaction with these school's administrations impact on the ability of the department to apply equity in standards of service delivery across the department. While outside the terms of reference of this review, indications of 'urban drift' of students from other FSM States (in particular Yap and Chuuk) in recent years add to the challenges of appropriately allocating human and other resources to respond to widely fluctuating student enrolments.

This Management Review found that, of the 157 performance criteria established, the Pohnpei DOE is fully compliant with 40 (25%). Areas where the Review noted satisfactory efforts include the operations of the scholarship board, the development of a sound curriculum framework and the implementation of progressive vocational programs. With regards to the latter, these programs feature work placement for students, provision of allowance for works performed and instruction in traditional life skills. The program is designed to encourage students to maintain commitment and involvement. A desire to move towards employee contracts will enhance employment practices and performance evaluation.

The department was assessed during the Review as being non-compliant with 29 criteria (18.4%). General areas of non-compliance relate to no in-service training or staff (skills) development. On this point, the Review noted that all but 6% of the teaching staff have not achieved the qualifications for certification. With 94% of the organization's teachers certified, the Department can be extremely satisfied with progress towards certification of teachers. Assessment of criteria relating to programs for gifted students and the recruitment processes for employees indicated other areas of non-compliance. Current activities, such as the Professional Standards Project will also support compliance.

Of the remaining Review performance criteria, the department was assessed as being partially compliant in a massive 69 (44%). In many of the areas of partial compliance, the auditor felt that solutions to these issues were fairly straight forward and capable of being rectified. Addressing the following areas of partial compliance would see the department soundly positioned, with a potential of between 50% and 77% compliance:

- Streamlining Strategic Planning and introducing proper Annual Planning reporting, monitoring and evaluation
- Strengthening performance evaluation processes
- Skilling supervisors in their roles and responsibilities
- Having curriculum specialists become more actively involved with teachers

- Conducting detailed analysis of tests scores and data and presenting that information to schools
- Schools having the responsibility to record and manage property inventories and to conduct their own audits
- Strengthening of discipline – particularly regarding to teacher Codes of Conduct and teacher attendance to duties

There were 19 criteria which could not be assessed due to influences such as the Board not meeting for 18 months and the absence of documented professional standards (currently being addressed). This is considered a relatively large number of criteria where assessment was not possible. It was noted that most of the criteria where assessment could not be conducted involved issues outside the direct control of the Director or the department.

In summary, the Review found the following issues to be matters of concern as far as their impact on educational operational service delivery:

- Limited or no opportunities for on-going skills development for teachers and other staff (particularly through the absence of a schedule in-service training program)
- Secondments to other tasks (some where specialists are temporarily transferred to FSM NDOE which places strains upon the State organisation to maintain core business or activities)
- Non alignment of curriculum standards and an understanding of a focus on standards and benchmarks
- Discipline and professional standards – especially with regards to teacher attendance for instruction
- Strategic planning – mission statement is complex and confusing
- Limited effective monitoring and evaluation of annual activities. Not supported through the development of Annual Plans
- Absence of promulgated policy and procedures
- Failure of Board of Education to meet and support the department for a period of 18 months from August 2008
- Lack of effective communication and interaction with schools on outer islands
- Position Descriptions not reflects of current tasks or duties performed by staff (in some cases there is an absence of any Position Descriptions for staff, e.g. employees in T3 program and the traditional Life Skills program do not have any documented PDs to guide them in the performance of their duties.
- Complying with WASC requirements for certification.

In relation to discipline, it is worthy of note that the Director has commissioned a project to address Professional Standards within the organization. Outcomes of this initiative will support the department in enhancing its position of greater compliance with organisational performance criteria. Coincidentally, this project will also address requirements set out in WASC accreditation certification.

The Review found that many of the issues facing Pohnpei DOE have been previously identified in other States. In fact, the challenges identified in Pohnpei mirror many faced by other State DOEs. Subject to the findings of the Management Review for FSM NDOE, it is felt that a coordinated, cooperative and consistent approach to resolution of non compliance across ALL State and National departments is warranted.

SUMMARY OF RECOMMENDATIONS

The following recommendations are made as a result of the management audit conducted in Pohnpei 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 Pohnpei 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 Pohnpei, 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 **(P21)**

Recommendation Two:

It is recommended that an evaluation is conducted for persons engaged from a state level to support national activities so that there is no negative impact on State core business. **(P22)**

Recommendation Three:

It is recommended that the Pohnpei DOE Director, convene a working group of specialist teachers to review and analyse NST and Pohnpei State assessment data and develop strategies for addressing areas of weakness or concern. **(P23)**

Recommendation Four:

It is recommended that a more thorough orientation is developed for future volunteers, orientation sessions to incorporate presentations from all key and relevant Pohnpei DOE specialists so as to assist volunteers in preparing and delivering educational services in accordance with DOE strategic direction. **(P23)**

Recommendation Five:

It is recommended that a more structured forum exist whereby collaboration and the sharing of information and expertise between WTP volunteers and local teachers is achieved. **(P23)**

Recommendation Six:

It is recommended that an Action Plan is developed with achievable activities and outcomes being incorporated within that plan so that PICs High school meets WASC requirements for accreditation. **(P36)**

Recommendation Seven:

It is recommended that vocational a structured and regular in service training program is developed and implemented for teachers. **(P36)**

Recommendation Eight:

It is recommended that Pohnpei Government consider amending the status of the Director on the Board and allow for him to become a sitting member on the Board. **(42)**

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. **(P51)**

Recommendation Ten:

It is recommended that where teacher student ration exceed 1:20 consideration should be given to allocation of additional teaching staff. **(P59)**

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. **(P73)**

Recommendation Twelve:

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. **(P77)**

Recommendation Thirteen:

It is recommended that an accreditation team been established to monitor the progress the Annual Plans and the Strategic Plan to ensure outcomes are being achieved. **(P77)**

Pedagogy

Recommendation Fourteen:

It is recommended that the Pohnpei 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. **(P92)**

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. **(P92)**

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. **(P95)**

Administration

Recommendation Seventeen:

It is recommended that the State Department of Education provide a template of a report to be provided to the Private Schools outlining the necessary information. **(P102)**

Recommendation Eighteen:

It is also recommended that a formalized structure of meetings, oversight and reporting is established between the DOE and the Private School. **(P102)**

Recommendation Nineteen:

It is recommended that the selection and hiring of special instructors is guided by the development of policy and procedures. **(P105)**

Recommendation Twenty:

It is recommended that documented policy and procedures – designed to compliment and reinforce FMR provisions – are developed by the DOE. **(P107)**

Recommendation Twenty-One:

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. **(P107)**

Recommendation Twenty-Two:

It is recommended that all PDs are reviewed for accuracy and relevance to current duties performed. **(P111)**

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. **(P113)**

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. **(P115)**

Recommendation Twenty-Five:

It is recommended that DOE develop and adopt organizational policies and procedures which will also guide the development of localized school based policy manuals. **(P123)**

Recommendation Twenty-Six:

It is recommended that issues identified in this criteria need to be supported with documented policy and procedures. **(P125)**

Recommendation Twenty-Seven:

It is recommended that all schools develop their own property and equipment lists and conduct their own inspections prior to central office inspections. **(P127)**

INTRODUCTION

Background

This report represents the findings of a management audit and functional analysis conducted in the State of Pohnpei for the Pohnpei Department of Education (DOE) between January 2010 and May 2010.

The Pohnpei DOE management audit is the third 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. Kosrae was the second audit conducted in 2009-2010 with the report being submitted in March of 2010.

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 Pohnpei 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 Pohnpei 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 Pohnpei 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 Pohnpei 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 Pohnpei 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.

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 Pohnpei DOE mirrors the approach undertaken with the Yap DOE audit in 2008 and the Kosrae audit in 2010. 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, as with Kosrae, Pohnpei 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, Pohnpei 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 and Kosrae 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 Pohnpei DOE operational environment.

As with the Yap and Kosrae Audit Reports, this Pohnpei 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 Pohnpei DOE found a number of issues identical (and relevant) to the Yap and Kosrae review. While seeking to ensure this document can be reviewed as a 'stand alone' evaluation of Pohnpei 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 and Kosrae 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 Pohnpei has an estimated population of about 34,840. According to the 2000 FSM National Census, population demographics are – 50.2% males and 49.8% females. Student enrolment rate is 76.1% Elementary School and 22.8% High School.

Pohnpei DOE is an organization of 781 personnel (574 Teachers and 207 Department Staff).

The annual budget for DOE is \$12 M. (Sector Grant - \$9.2m plus SEG \$2.8m)

There are thirty-four (34) facilities within the Department – 31 Elementary Schools, 3 High Schools and Department Headquarters Doloria (across from the High school. Schools are located in the following Municipalities:

Main Island

- Kolonia School
- Ohmine School
- Nett School
- Parem School
- A wak School
- Saladak School
- ESDM School
- Lukop School
- Sapwalap School
- Pohnlangas School
- Wapar School
- Temwen School
- Mand School
- Sokehs Powe School
- Sekere School
- RSP School
- Lewetik School
- Palikir School
- Pakein School
- Enipein School
- Pehleng School
- Seinwar School
- Salapwuk School
- NMS School
- Rohi School
- Wone School

Outer Islands

- Mokil School
- Pingelap School
- Sapwuafik School
- Nukuoro School
- Kapinga School

High School

- Madolenihmw High School
- Nanpei Memorial High School
- PICS High School

The following table indicates the number of students per grade for each Elementary School (SY09-10).

	Elementary School	ECE		Grade 1		Grade 2		Grade 3		Grade 4		Grade 5		Grade 6		Grade 7		Grade 8		Total
		M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	
1.	Kolonia School	29	33	49	43	45	35	44	33	43	49	50	37	35	53	37	41	35	46	736
2.	Ohmine School	22	23	25	18	47	48	47	41	52	47	67	56	55	48	41	51	58	52	798
3.	Nett School	27	36	51	68	58	62	60	64	64	52	64	60	51	75	38	43	51	44	968
4.	Parem School	7	7	6	5	8	4	3	7	2	6	5	4	2	2	4	1	3	7	83
5.	A wak School	8	11	8	9	12	11	14	16	10	14	18	11	9	9	15	12	23	9	219
6.	Saladak School	17	10	30	30	16	21	29	21	25	21	18	19	32	22	25	23	18	17	394
7.	ESDM School	11	5	9	11	12	8	7	11	19	10	14	9	8	18	9	14	13	10	198
8.	Lukop School	14	14	7	11	11	11	13	13	21	16	11	17	19	15	14	8	15	15	245
9.	Sapwalap School	11	13	30	21	18	17	22	18	34	18	23	32	16	27	24	21	19	19	383
10.	Pohnlangas School	0	0		0	0	0	0	0	0	0	0	0	28	14	11	24	34	29	140
11.	Wapar School	9	6	12	12	8	9	15	8	20	6	15	8	0	0	0	0	0	0	128
12.	Temwen School	0	0	12	6	5	7	4	5	6	12	5	8	0	0	0	0	0	0	70
13.	Mand School	9	7	6	13	3	4	5	8	8	4	9	11	0	0	0	0	0	0	87
14.	Sokehs Powe School	12	7	12	11	5	7	11	16	25	10	12	14	14	18	24	7	21	8	234
15.	Sekere School	16	20	11	15	16	15	20	28	21	22	10	22	13	12	23	19	20	18	321
16.	RSP School	10	7	7	12	8	10	16	10	14	11	17	6	9	9	9	8	11	7	181
17.	Lewetik School	0	0	4	3	3	5	3	5	4	1	4	1	3	5	2	7	2	7	59
18.	Palikir School	22	19	55	39	35	30	36	36	41	36	32	35	24	38	29	25	29	33	594
19.	Pakein School	0	0	0	2	0	1	1	2	0	6	1	2	0	0	2	6	2	7	32
20.	Enipein School	10	10	12	16	7	7	14	14	14	15	15	14	10	9	16	16	13	17	229
21.	Pehleng School	17	19	17	21	26	12	21	18	18	22	16	24	17	10	15	14	17	13	317
22.	Seinwar School	0	0	17	17	19	20	19	15	16	25	17	16	26	19	13	18	14	23	294

23.	Salapwuk School	0	0	5	10	2	3	13	7	6	2	5	6	2	6	4	4	3	4	82
24.	NMS School	27	26	10	12	13	7	9	19	19	17	11	11	16	12	12	11	12	12	256
25.	Rohi School	0	0	10	11	11	8	16	1	12	8	13	6	13	6	18	4	11	10	158
26.	Wone School	18	15	9	13	21	10	15	13	10	11	10	14	19	10	8	16	17	14	243
27.	Mokil School	0	0	2	1	2	1	1	3	2	1	1	0	1	1	2	4	1	4	27
28.	Pingelap School	0	0	3	4	1	4	2	1	2	0	1	2	3	0	2	2	3	5	35
29.	Sapwuafik School	5	11	9	6	8	4	5	4	10	2	6	13	9	6	10	3	7	6	124
30.	Nukuoro School	0	0	6	6	5	5	8	6	6	3	4	5	3	4	4	3	1	2	71
31.	Kapinga School	0	0	5	5	9	5	5	5	10	10	8	6	18	8	12	8	13	4	131
Total Number of Students																			7837	

The following table indicates the number of students per grade for the High Schools (2009-2010).

	High School Name	Grade 9		Grade 10		Grade 11		Grade 12		Total
		M	F	M	F	M	F	M	F	
1.	PICS High	211	195	186	228	150	168	152	171	1461
2.	NMHS High	69	83	74	81	72	76	66	63	584
3.	MHS	61	66	51	55	51	60	31	43	418
Total Number of Students										2463

Currently, there are 7 World Teach volunteers with the Pohnpei Department of Education and they are teaching at three of the Pohnpei State DOE High Schools (PICS, NMHS, MHS). The World Teach program is in its 2nd year of operations.

The total population for Pohnpei State in 2000 was 34,486. The 2000 Census predicated a growth rate of .34% annually. While no official population figures will be available until the next census (2010) it is widely accepted that the current population is 34,794. If this anecdotal figure is to be generally accepted, this represents an increase of 9% for the Pohnpei State population in the past 10 years. However, this is not reflective of ECE enrolment numbers which indicate a decrease in 36 students from SY 08-09 (636) to SY 09-10 (600) (-5.7%).

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 with the findings of the Kosrae Management Audit 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**).

Enrolments (2009-10) by gender in Elementary Schools are almost equal. The number of boys are (4011 – 50.9%) and girls are (3826 – 49%). Enrolments for the three High Schools show the ratio of boys and girls is significantly different, with the number of girls enrolled being 4.7% more than boys of the total student population. (Boys enrolled (1174 - 47.6%) girls enrolled (1289 - 52.3%)). Population census figures for 2009 indicate that the ratio of males to females in the community is 51.3% to 48.7%. There does not however, appear to be an internal monitoring system to interpret population data and school enrolment data.

Elementary Enrolment by Grade for SY 08-09 (*Including Outer island Schools*).

	ECE	1 ST	2 ND	3 RD	4 TH	5 TH	6 TH	7 TH	8 TH	TTL
Male	310	480	478	527	485	480	409	489	434	4092
Female	326	417	446	466	482	487	433	457	427	3941
Total	636	897	924	993	967	967	842	946	861	8033

Elementary Enrolment by Grade for SY 09-10 (*Including Outer island Schools*).

	ECE	1 ST	2 ND	3 RD	4 TH	5 TH	6 TH	7 TH	8 TH	TTL
Male	301	439	434	478	534	482	454	423	466	4011
Female	299	451	391	448	457	469	456	413	442	3826
Total	600	890	825	926	991	951	910	836	908	7837

Elementary school decrease in enrolment numbers of -2.43%

High School Enrolment by Grade for SY 08-09 (Including Outer island Schools).

	9 th	10 th	11 th	12 th	TTL
Male	395	285	295	284	1259
Female	373	343	311	253	1280
Total	768	628	606	537	2539

High School Enrolment by Grade for SY 09-10 (Including Outer island Schools).

	9 th	10 th	11 th	12 th	TTL
Male	341	311	273	249	1174
Female	344	364	304	277	1289
Total	685	675	577	526	2463

High school decrease in enrolment numbers of -2.99%

The FSM National Standardized Test (NST) is administered each year by the Pohnpei DOE. This test is a 'standards and benchmark' based examination for English and Mathematics applied to grades 6, 8, and 10. Information acquired from these tests indicates proficiency levels of advanced, proficient, basic and below basic. Basic or below indicates needs for improvement. Year 2010 results from the NST have not been returned to schools due to the testing officer being recruited by the FSM NDOE. Skilled employed at a State level are being seconded to perform National duties. While there are benefits to be acknowledged of recruiting state personnel to fulfil a national requirement caution must be exercised so as to not to create a void of those skills at the State level. It is recommended that an evaluation is conducted for persons engaged from a state level to support national activities so that there is no negative impact on State core business. **(Recommendation 2 refers)**. Consideration should be given to providing this test to students starting in grades from 2. This would capture those students with proficiency levels below the standard at a much earlier level and allow for structured core skills development to be undertaken to improving the students learning capabilities.

Discussion focus group sessions conducted at schools as part of this audit indicated that schools received limited data on the results of the NST and the Pohnpei assessments. There seems to be a lack of any deep analysis of the data with the intention of developing, responding and solving any weaknesses identified from past tests administered. Information provided appears to be broken down to classroom performance and not individual student levels. This data can be provided at this level upon request by teachers. This would allow for more accurate interpretation in the areas of strengths and weaknesses of students. Teachers requested that the testing unit come to the schools and present the results of the tests along with the Subject Specialists and provide assistance and advice on how to best address the weaknesses identified. As little analysis is conducted of the data, strategies employed by some teachers addressing poor results in specific areas are well intended but ad hoc and questionable in their value. The testing unit within the Central Office of DOE undertakes the analysis, and there does not appear to be any real advantageous or beneficial responses to assessment data.

It is recommended that the Pohnpei DOE Director along with the Staff from the testing unit, convene a working group of specialist teachers to review and analyse NST and Pohnpei State assessment data and develop strategies for addressing areas of weakness or concern. **(Recommendation 3 refers)**.

2010 COMET Essay testing results indicated that PICS (a1) were placed overall in 5th position out of students from 26 schools across the FSM with a rating of 36.72 (Two private schools – Xavier and CCA finished first and second respectively). The other PICS groups tested with scores of 34.69 (PICS a2) and 28.02 (PICS). Other high schools from Pohnpei were placed in the middle of all the high schools MHS (mean 26.4), NMHS (mean 25.15) and NMHS B (mean 26.8). There is scope for these three high schools to improve their overall rankings against those of other high schools and bring them more in line with that of PICS.

The Pohnpei 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 7 WTP Volunteers engaged by the DOE. Three of the teachers are providing services at the PICS high school with two at MHS and two at NMHS. To date significant interaction between local teachers and the WTP Volunteers in not being fully realize. Where classes were co-shared between WTP Volunteers and local teachers, WTP Volunteers were often left to teachers the whole class with little or no input from local teachers.

Volunteers were provided some orientation, but their integration into the educational system is inconsistent. 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. The Pohnpei State DOE strategic plan was not provided to Volunteers thus not allowing for a shared vision of the direction of the Department and the services to be developed. The Volunteers were however, aware of the National Standards framework and developed their teaching objectives to those frameworks. Volunteers were not supported while integrating into the new school environment.

The continued use of the WTP is strongly supported by the auditor. It is recommended that a more thorough orientation is developed for future volunteers, orientation sessions to incorporate presentations from all key and relevant Pohnpei 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 11

	Source	Criteria	Means of Verification	Compliance Status
1.	Mission Statement	The State Education Mission is 'The Pohnpei State educational system recognizes its shared participation with parents, extended family and broader social structures in the intellectual, emotional, physical and social development of children. It will deliver a quality, sustainable basic education system which provides all students with basic skills, thinking skills, and personal qualities; provides for the manpower needs of the state; develops a literate population based on the revitalization of local languages and cultures while ensuring high competence in English and other international languages; and collaborates with all sectors of the government and community to fully utilize available human and financial resources in developing the educational foundation required for sustainable economic growth and social development.'	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	Partial Compliance Sustainable education systems have been developed through the Pohnpei State DOE Curriculum Framework. This has been designed to ensure that all schools are teaching students at the same level benchmarks are being met. With the development of vocational educational training for students allowing for development in the areas of skills development to ensure manpower needs of the state are met. However, in state comparisons of student performance in national standardized test, Pohnpei Students are not doing so well in the area of language competence. Pohnpei Students are scoring below proficient in some levels when tested.
2.	Strategic Goal One and Objectives	Revise curriculum and standards to allow the education system to support a strong and vibrant local culture while preparing students to participate in the global economy. 1. Review and revise standards, curriculum and benchmarks for vernacular languages that support state and national	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	Partial Compliance There have been significant improvements with area of curriculum development with the new National and State Curriculum Framework. This framework incorporates benchmarks that each student is to obtain while being in line with the National language policies.

		<p>language policies and support the values of respect, responsibility and honesty.</p> <ol style="list-style-type: none"> 2. Review and revise standards, curriculum and benchmarks to reflect English as a second language (ESL) / English as a Foreign Language (EFL) approaches to English instruction. 3. Align standards, curriculum and benchmarks from early childhood education (ECE) to second year college (COM-FSM) programs (including vocational and life skills) to improve participation, retention and graduation rates at each level (ECE, Elementary, Secondary Transition to College). 4. Incorporation workforce readiness and soft skills into standards, curriculum and benchmarks that support development of the local and participation in the global economy. 		<p>However, the curriculum framework that has been developed at the State level is deemed by many of the teachers to be too broad in some of the subject areas and is not specific enough when giving milestones to obtain. The standards do require students to use both English and local language.</p> <p>Standards are aligned to ensure flow on from one grade to the next.</p>
3.	Strategic Goal Two and Objectives	<p>Enhance instructional programs and services to allow students to perform at grade level.</p> <ol style="list-style-type: none"> 1. Promote bilingual instruction across the curriculum and grades. 2. Provide training, support and follow-up to enhance teachers' ability to provide quality instruction in vernacular (first language) and English (ESL/EFL). 3. Provide training that support workforce development needs. 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Partial-Compliance Bilingual instruction is done from grades K-3. This is done under the DISTRIP Program.</p> <p>Teachers were provided initial training, however there was no follow-up support or training to enhance quality instruction.</p>

		<ol style="list-style-type: none"> 4. Ensure that teachers meet certification requirements and teach in their areas of expertise. 5. Review, revise, develop and implement of best practices in learning centered instruction. 		
4.	Strategic Goal Three and Objectives	<p>Design and implement systems that support and enhance the education system and improve system accountability.</p> <ol style="list-style-type: none"> 1. Create an assessment/evaluation system/cycle that focuses on both in class formative and summative assessment and system wide assessments. 2. Establish a professional development system that incorporates pre-training, training, follow up and assessment elements and responds to individual and system needs. 3. Enhance system, school and individual capacity for effective use of technology to support learning. 4. Establish a data driven decision making process for the education system. 5. Develop and implement a communications plan for the education system. 6. Ensure that secondary schools are accredited. 7. Explore models of education and financing education in developing countries and small island devaluing nations for that 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Partial Compliance</p> <p>Standard Base Assessment in Reading and Social Studies is being implemented; this assessment is ensuring children are reaching the required benchmarks for the set standards. This was implemented 2009. Results are drawn down to item and grade level. These results need to be taken down to a student level for greater assistance to teachers and curriculum specialists. Tested 3, 5, 7, 9 and 11. NST tested is 6, 8, and 10.</p> <p>The integration of these two testing regimes need to be joined together to allow for the creation of a system wide assessment tool to be developed. Greater emphasis needs to be placed on teachers to develop their own assessment on student performances. No extensive technology plan has been developed for the schools within Pohnpei. Schools do not have adequate access to computers for teachers and the internet to support learning, let alone students accessing computers for student learning.</p> <p>No evidence of a communications plan was provided for the education system. Meetings are held bi-weekly and any</p>

		can impact increased student learning, provide alternate means for school governance and enhance revenue streams.		<p>information is passed to select members and on forwarded to teachers from this group. There is no guarantee that information is passed on.</p> <p>The secondary schools have not passed the accreditation process at this time and are undertaking the necessary steps to amend the areas nominated.</p> <p>Evidence was obtained through documentation from the PRIDE project. This project developed the Strategic Plan, Curriculum Framework, Life Skills training Center and PICS trades' academy.</p>
5.	Strategic Goal Four and Objectives	<p>Provide for safe and secure learning environments and facilities.</p> <ol style="list-style-type: none"> 1. Establish standards for facilities and facilities maintenance that incorporate the needs of special needs students. 2. Ensure that schools meet safety and sanitation requirements. 3. Expand library and physical education facilities. 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Partial Compliance</p> <p>Facilities in a number of locations have been significantly upgraded with new classrooms being constructed. Most of the classrooms are to the minimum standard with some schools require minimum work to be undertaken to achieve the necessary standards. Most of the schools have libraries and all require expansion of these facilities. Physical education facilities would be as little as purchasing of equipment such as basket balls and other such needs.</p>
6.	Strategic Goal Five and Objectives	<p>Establish mechanisms that enhance community involvement in instructional support and school operations.</p> <ol style="list-style-type: none"> 1. Develop and implement school based plans for increased community involvement in improving the school and system learning 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Partial Compliance</p> <p>Most schools have community involvement through parent participation in classroom activities.</p> <p>PTA's have been established in all school communities and meetings held quarterly and on add needs bases. These PTA's are also meant to assist</p>

		<p>environment.</p> <ol style="list-style-type: none"> 2. Increase community involvement in support of vernacular/cultural and life skills programs. 3. Expand instructional programs in concert with traditional leaders, NGO and other local organizations. 		<p>with supporting school programs being implemented.</p> <p>Some schools have input from traditional leaders and other local organizations, however, there needs to be care taken that they do not interfere with the implemented school program and required number of teaching days and learning sessions.</p>
7.	Strategic Goal Six and Objective.	<p>Improve the quality and quantity of Pohnpeian and English instructional materials in core subjects.</p> <ol style="list-style-type: none"> 1. Provide English textbooks and instructional support materials for all core subjects and appropriate grade levels. 2. Develop vernacular and English language instructional materials for ECE - grade 3. 3. Establish quality standards for matching textbooks and instructional materials to standards and curriculum and development of vernacular and English instructional materials. 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Partial Compliance</p> <p>Textbooks provided support most core subject learning needs and are mostly appropriate to grade levels, however, for students with learning difficulties books are at a level to high for their needs.</p> <p>English and local language books have been developed for ECE and grade 3 students which are age appropriate. These books were designed in cooperation and input from local staff.</p> <p>Textbooks are in line with curriculum standards.</p>
8.	Pohnpei State Constitution Article 7 §3 Part 1	The Government of Pohnpei shall provide educational services for the public. Compulsory education through a grade to be set by statute shall be enforced by law. Public education of citizens of Pohnpei through a grade as prescribed by statute shall be free of fees. Any fees imposed for public education shall be limited to the ability to pay	Evidence of education services provided to the public at minimal cost. Students to continue at school to such a grade as imposed by legislation.	<p>Compliance</p> <p>The audit found the Department of Education was providing free public education for eligible children in the State. And that whenever fees were imposed they were kept to a limited which was able to be paid by family members.</p>

9.	Pohnpei State Constitution Article 7 §3 Part 2	All public and private educational institutions shall comply with minimum standards of educational achievement which shall be established by the Government of Pohnpei	Evidence curriculum is being developed in accordance with National and State curriculum standards ensuring minimum standards are met.	Partial Compliance The audit found that schools are developing curriculum benchmarks which met the minimum standards for educational achievement as established by the Government of Pohnpei. However, even with the minimum standard being applied students are still not successfully passing the NST or the PHST in significant enough numbers. Out of the 862 students that took the PHST only 656 passed (76%).
10.	Pohnpei State Constitution Article 7 §3 Part 3	The Government of Pohnpei shall establish and faithfully execute comprehensive plans for the continual improvement of educational standards and services.	Evidence of a comprehensive plan for continual improvement for educational standards and service	Non-Compliance There was no evidence of the Government of Pohnpei executing a comprehensive plan for the continual improvement of educational standards and services.
11.	Pohnpei Code of Law Education Act 1999 Title 1 §1-2	<p>(2) The states responsibility for establishing and maintaining such schools and related facilities, programs, and other resources, as may be reasonable and necessary to provide educational opportunities for the people of Pohnpei</p> <p>(3) The need to encourage citizen involvement in educational matters by providing for schools that guarantee and support local participation consistent with the goal of a thorough and efficient system of education serving all of the people of the state of Pohnpei.</p> <p>(4) That a primary goal of education in the state of</p>	<p>Evidence of schools established and maintained in accordance with legislative requirements.</p> <p>Evidence of the extent of PTA involvement in schools and educational matters.</p> <p>Demonstrated capacity towards self-reliance in examples of educational</p>	<p>Partial Compliance A number of new facilities have been built and maintenance work is being undertaken and other schools. Most schools are maintained at a minimum level allowing for educational opportunities for the people of Pohnpei. However, more could be done in the area of maintenance.</p> <p>Greater participation by PTA's within school communities to assist with achieving this outcome. PTA's need to be more actively involved in decision making process within schools.</p> <p>With the development of the Pohnpei State Curriculum Framework this goes someway to self-reliance, however, with out in-service teacher training and</p>

		Pohnpei shall be to foster self-reliance, and that educational programs and curricula are structured to further this goal.	programs and developed curriculum.	the development of skills for teacher's true self-reliance will not be achieved.
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Responsibility and Authority of the State Director of Education

The Director of Education's responsibilities and authority are outlined in the Pohnpei Code of Law Education Act 1999. This Act also provides for the roles and responsibilities of the Board of Education. As there is statutory oversight by the Board on functions undertaken by the Director failure by the Board to fully execute their duties may lead to a propensity to inhibit the effectiveness of the Director. The Board of Education did not meet and fulfil its obligations between August 2008 and May 2010, therefore the statutory requirements for oversight on the activities on the Director of Education were not fulfilled. Having said that, this reviewed has found the Director has fulfilled the requirements of the Education Act 1999.

Current policies and procedures which the Department of Education work within are outdated and very limited in their ability for accountability with subsequent disciplinary actions. These polices need reviewing and updating to bring in line with current policy mythologies used by education institutions pacific wide. Divisional Chiefs and supervisor are not held accountable for the activities and outputs for their divisions, and this cascade down to subordinates not being held accountable to their supervisors for the achievements or lack of achievement of goals.

The Director has facilitated the establishment of a committee consisting of Senior Executive to support the administration of the Department. Management Review Council (MRC) consists of the Director and Chiefs of Divisions hold meetings on weekly basis. The MRC monitors the progress of each of the Divisions within the Department. For the strategic enhancement and greater impact and influence on the Department these meetings need to be structured more formally, that is a detailed agenda formulated and minutes taken. Divisional Chiefs are required to bring Annual Plans to MRC meetings and indicate progress against strategic activities and outputs. The review found that Annual Plans should be aligned and measured for achievements against the Five Year Strategic Plans. No evidence was found to support this.

Below - Audit Table 2 – incorporating Performance Indicators 12 to 21

	Source	Criteria	Means of Verification	Compliance Status
12.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (1)	The executive functions of the Department of Education shall be vested in the Director of Education who shall: Administer programs of education and public instruction throughout the state of all types through the secondary level;	Evidence of programs of education being administered in public schools throughout the State at from Elementary to Secondary level.	Compliance The Director is fulfilling all requirements in regards to programs of instruction and education being administered in public schools. Programs have been developed and are being delivered from ECE to Secondary level schools.
13.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (2)	Assist the Board of Education in the performance of its duties pursuant to this act;	Evidence of demonstrated level of assistance provided to Board in ensuring performance of the Boards duties are carried out in accordance to the act.	Non-Compliance There is no evidence the Board of Education has sat since August 2008. The Director therefore is unable to perform his duties in accordance with the act. The Director should have called meetings prescribed within the act on quarterly bases.
14.	Pohnpei Code of Law Education Act 1999 Title III Part 3 § 2-6 (3)	Implement and enforce the educational standards for public schools through the secondary level as prescribed by state law and the decisions of the Board of Education	Evidence of demonstrated implementation and enforcement of educational standards as prescribed by statute and documented evidence of the any decisions in relation to enforcement of educational standards by the Board.	Partial Compliance The policies and procedures in relation to educational standards and professionalism within the public school system at all levels is found to be 'wanting' in levels of breaches of discipline that the Director is able to discipline for. The Board of Education is has not made any decisions since 2008 in relation to enforcement of standards due to it not sitting or being in existence.
15.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (4)	Promote standardized testing and research and planning for the improvement of educational programs;	1. Evidence of the promotion of standardized testing within the schools. 2. Examples of research taking place and planning for improved	Partial Compliance The NST is being undertaken within the Schools but only at levels 6, 8, and 10. There is no evidence of standardized testing at any other level to ensure

			educational programs	<p>learning is taking place. Teachers through their own testing are ensuring benchmarks are being obtained.</p> <p>The Testing Unit within the main office provides results back to the schools of the NST, however, little research is being undertaken of these results to improve education programs. Teachers are altering their methodologies to ensure learning takes place, and not all teachers are doing this.</p>
16.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (5)	Prepare and submit, with the Board's concurrence, a proposed department budget to the Governor for inclusion in the state budget;	Examples of proposed department budgets presented to the Board for concurrence and to the Governor for inclusion in state budget.	<p>Non-Compliance</p> <p>The recent budget was not approved due to the Director not presenting the budget to the Board for its approval prior to being sent to the Governor for inclusion in state budget.</p>
17.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (7)	Be responsible for physical facilities planning, construction and maintenance;	Evidence of plan for facility planning, construction and maintenance.	<p>Partial Compliance</p> <p>Currently there is extensive maintenance work and other classroom construction being undertaken on schools within the Pohnpei. However some schools still need basic work to be undertaken such as floor coverings and bathrooms that work.</p>
18.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (8)	Except as otherwise provided by law, sign all drafts for the payment of monies, all commissions and appointments, all deeds, official acts, or other documents of the Department, and use a printed facsimile signature when appropriate;	Examples of at least three documents required by law for signature.	<p>Compliance</p> <p>The Director signs all legally required documents prior to their dissemination. No document leaves the Department of Education without prior approval or signature by Director.</p>
19.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (9)	Review and evaluate textbooks and materials before purchase in order to determine their suitability as may be consistent with the established	Examples of reviews and evaluations of textbooks prior to purchase showing constancy with established curricula.	<p>Partial Compliance</p> <p>Textbooks were reviewed by Director prior to purchasing. However, throughout the audit it has been shown</p>

		curricula;		that the textbooks did not always meet the requirements of the benchmarks set out in the curriculum framework.
20.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (10)	Present to the Board, a full annual report of the principal transactions within the Department during the fiscal year, which report shall include: <ul style="list-style-type: none"> a. The number and percentage of students in public and non-public schools, to include state-wide, municipal, and individual school totals, as well as a breakdown by grade level; b. Student achievement levels, and actions being taken to improve them; and c. An analysis of the effectiveness of actions implemented to address the needs of students; and which together with any policy recommendations from the Board, shall be presented to the Governor and to the Legislature at least 20 days prior to the convening of each January regular session, and made available to the general public. 	Examples of full annual report provided to the Board with full legislated requirements.	Partial Compliance Evidence received that a presentation was done to the Board on a full annual report outlining all the legislative requirements. This report was presented May 2009.
21.	Pohnpei Code of Law Education Act 1999 Title V §5-4	Annual Report. Private schools shall submit an annual report to the Department in a form established by the Department. Failure to comply with this requirement shall constitute an offense punishable by a fine of not more than \$100 for each offence.	Three (3) examples of annual reports from two (2) different private schools.	Partial Compliance Documented evidence was found that all schools provide to the Director of Education information on schools at the end of the school year, this information could not be called reports. However out of the five private schools in Pohnpei, four submit a one page document this document provides the most basic of information. One school

				provides a detailed report outlining attendance of students and teachers, qualifications of teachers, maintenance of facilities, expenditure, and parent participation in school activities, workshops and in-service training provided for teachers. This format should be followed for all private schools.
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Education System – Role of Administration of DOE

The role of administration of the Pohnpei State DOE is outlined in the Pohnpei State Code of Laws. Two (2) requirements relating to minimum hours for session times per day and the number of days required per semester 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.

During this audit PICs High School was assessed by The Western Association of Schools and Colleges (WASC) in relation to accreditation. The WASC review team outlined a number of deficiencies prior to accreditation being granted. These areas of deficiencies are indicated as follows:

- School must develop school-wide professional development plans that maximize teacher effectiveness
- School must address teacher absenteeism because it greatly impacts the quality of contact between teacher and students and the quality of student learning
- School must provide increased monitoring of the school campus to ensure a safe environment for all students
- There is a need for two-way communication at all levels: between administration and faculty and between administration/faculty and students
- There is a need for refining and aligning the developed standards with indicators specific under each component of the PICs ESLRs
- Administration and faculty must utilize available student assessment data to modify and enhance curriculum and improve instructional practices.

It was noted by the WASC review team that commitment needs to be given by the Department of Education and the Leadership Team (established by the Director) so that all standards for accreditation are met and maintained. It is recommended that an Action Plan is developed with achievable activities and outcomes being incorporated within that plan so that PICs High school meets WASC requirements for accreditation. **(Recommendation 6 refers)**.

This audit did not find a regular in-service training program for the development of skills for teachers, other than summer school for some teachers at College of Micronesia, further, it was found that teachers attending COM were not taking courses appropriate to their area of teaching. As the Department of Education is paying for the teachers to undertake this study, no teacher should be able to undertake study until prior approval is given by the Director or Chief of Curriculum. 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 22 to 26

	Source	Criteria	Means of Verification	Compliance Status
22.	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.	<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 • 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 and improving educational systems.</p> <p>Materials resources have been developed to support educational systems, however, limited levels of management and accountability and further limited to no emphasis in areas of raising staff skills levels and improving relevance of education to needs of economy.</p>
23.	Pohnpei Code of Law Education Act 1999 Title III §2 Section 3-5	The school year shall consist of not fewer than 180 sessions days divided into two semesters exclusive of holidays	That the school year consists of 180 session days and does not take into account holidays	<p>Partial Compliance The school year is designated to consist of 180 sessions days divided into two semesters. However, it was found that a number of days a missed due to traditional leaders calling off school due to funerals or other such occasions or other needs of municipal governments. These days are not made up and semesters are short.</p>

24.	Pohnpei State Department of Education School Policy Manual Policy 104.1	<p>The following minimum subject time allotments shall apply in all public schools in Pohnpei.</p> <table border="0"> <tr> <td>Subject</td> <td>Grade 1-3</td> <td>Grade 4-8</td> </tr> <tr> <td>Lang Arts</td> <td>90 mins.</td> <td>120 mins</td> </tr> <tr> <td>Vernacular</td> <td>20 mins.</td> <td>40 mins</td> </tr> <tr> <td>Math</td> <td>20 mins.</td> <td>40 mins</td> </tr> <tr> <td>Soc Stud.</td> <td>20 mins.</td> <td>40 mins</td> </tr> <tr> <td>Scien/Heal.</td> <td>20 mins.</td> <td>40 mins</td> </tr> <tr> <td>Art/Music</td> <td>20 mins.</td> <td>40 mins</td> </tr> <tr> <td>P.E.</td> <td>20 mins.</td> <td>40 mins</td> </tr> </table> <p>Any departure from the time allotment allocations will require express prior approval from the Director which is subject to Board of Education review upon request.</p>	Subject	Grade 1-3	Grade 4-8	Lang Arts	90 mins.	120 mins	Vernacular	20 mins.	40 mins	Math	20 mins.	40 mins	Soc Stud.	20 mins.	40 mins	Scien/Heal.	20 mins.	40 mins	Art/Music	20 mins.	40 mins	P.E.	20 mins.	40 mins	<ol style="list-style-type: none"> 1. That the students are being taught the required level of time allotments for each of the nominated subjects. 2. Permission is sought by teachers or principals for any departure from the required allotment allocations. 3. Curriculum is developed to ensure allotment allocations are met. 	<p>Compliance</p> <p>The public schools within Pohnpei comply with the minimum subject time allotments.</p> <p>Principals seek permission prior to departing from such allotment.</p> <p>Lesson plans are developed and provided to principals showing classroom instruction.</p>
Subject	Grade 1-3	Grade 4-8																										
Lang Arts	90 mins.	120 mins																										
Vernacular	20 mins.	40 mins																										
Math	20 mins.	40 mins																										
Soc Stud.	20 mins.	40 mins																										
Scien/Heal.	20 mins.	40 mins																										
Art/Music	20 mins.	40 mins																										
P.E.	20 mins.	40 mins																										
25.	Pohnpei State Department of Education School Policy Manual Policy 104.2	<p>The following minimum subject time allotments shall apply in all public high schools.</p> <table border="0"> <tr> <td>Subject</td> <td>Grade 1-3</td> </tr> <tr> <td>English</td> <td>50 mins</td> </tr> <tr> <td>Cultural Literacy</td> <td>40 mins</td> </tr> <tr> <td>Math</td> <td>40 mins</td> </tr> <tr> <td>Social Studies</td> <td>40 mins</td> </tr> <tr> <td>Science/Health</td> <td>40 mins</td> </tr> <tr> <td>Vocational Ed.</td> <td>40 mins.</td> </tr> <tr> <td>P.E.</td> <td>40 mins</td> </tr> <tr> <td>Foreign Language</td> <td>40 mins</td> </tr> <tr> <td>Computer Literacy</td> <td>40 mins</td> </tr> </table>	Subject	Grade 1-3	English	50 mins	Cultural Literacy	40 mins	Math	40 mins	Social Studies	40 mins	Science/Health	40 mins	Vocational Ed.	40 mins.	P.E.	40 mins	Foreign Language	40 mins	Computer Literacy	40 mins	<ol style="list-style-type: none"> 1. That the students are being taught the required level of time allotments for each of the nominated subjects. 	<p>Compliance</p> <p>Subjects are taught within the required allotments. This is ensured through the development of lesson plans provided to and approved by the principal.</p>				
Subject	Grade 1-3																											
English	50 mins																											
Cultural Literacy	40 mins																											
Math	40 mins																											
Social Studies	40 mins																											
Science/Health	40 mins																											
Vocational Ed.	40 mins.																											
P.E.	40 mins																											
Foreign Language	40 mins																											
Computer Literacy	40 mins																											
26.	Pohnpei Code of Law Education Act 1999 Title III Part 2 §3-8	<p>Standard achievement tests and accreditation.</p> <p>The Department of Education shall administer standard achievement tests on a periodic basis, at appropriate grade levels, as a measurement of the performance of</p>	<ol style="list-style-type: none"> 1. Standard achievement tests are provided on a periodic basis to the appropriate grade and analyzed to gauge performance levels of public and private schools. 	<p>Partial Compliance</p> <p>There were no observable tests being applied on a periodic basis to gauge performance of students. The only tests being administered at this time are the NST at the elementary level.</p>																								

		<p>the public and private schools of the state.</p> <p>The Department shall also seek membership in, or affiliation with, appropriate accreditation agencies for the purpose of raising school standards.</p>	<p>2. Membership sought and from an accredited agency and the standards of schools is raised.</p>	<p>However, students at the Secondary level are receiving tests on a periodic base to gage performance levels.</p> <p>Partial Compliance PICS high school underwent an accreditation review by WASC March 24-25. The report submitted by the visiting team indicated that PICS did not meet all the necessary accreditation criteria. A number of areas have to be addressed before full accreditation can be awarded.</p>
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Organization of the Department of Education

The most recent organizational chart as has an unknown development date. The chart does not flow down 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 the 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 27 and 28

	Source	Criteria	Means of Verification	Compliance Status
27.	Pohnpei Code of Law Education Act 1999 Title VI § 6-3 Amendment 3-3	Department of Education. The Department of Education shall consist of the following three divisions: (1)The Division of Administration, Services, and Specialized Education. (2)The Division of Pre-School and Primary Education; and (3)The Division of Secondary Education	Organizational chart showing listed divisions displaying departmental functions.	Compliance The organizational chart shows the required legislated Divisions within the Department of Education.
28.	Pohnpei State Code of Law Education Act 1999 Division 1 Title III Chapter 1 § 1-104	Executive Departments. There is hereby provided within the executive branch of the Pohnpei Government the following executive departments. Each department shall consist of an office of the director and such divisions as are listed there under. Each department shall be under the administrative direction of a department director. No department shall have a deputy director or assistant to the director. Each division, except in instances	1. Organizational chart showing indicating appropriate structure of staff and support staff.	Compliance The organizational chart outlines the required Divisions with the necessary support staff within the new requirements.

		<p>where the director maintains direct management of the division, shall have a division chief. In addition, each department shall be composed of such support staff as the annual Comprehensive Budget Act shall allow. Policy, review, and advisory boards and councils created for oversight of department activities shall be attached to the respective department for administrative purposes.</p> <p>(2) The Department of Education shall include the following divisions:</p> <ul style="list-style-type: none"> (a) The Division of Curriculum, Instructional Development, and Specialized Education; (b) The Division of Early Childhood Education; (c) The Division of Primary Education; and (d) The Division of Secondary Education 		
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**State Board of Education
Language Commission**

It is a requirement of the Education Act 1999 for the existence of the Board of Education. The previous Board of Education last met on August 6 2008. A new Board was appointed by the State Governor on May 2010, at the time of writing this report.

The Director is an ex-officio and non voting member of the Board of Education. The practicality of that is questioned, given that the Director and Board should be in a position of close exchange and support. As an *ex-officio* member, the Board, at their will has the ability if they so choose to exclude him from meetings.

The previous Board of Education did not have a meeting since August 6 2008, with no recorded meetings in 2009 and 2010. The budget for the Department of Education is to be approved by the Board of Education prior to submitting to the Governor for inclusion in the State budget. With the Board not meeting on a regular base, and the Governor dissolving the Board at a critical time for the Director it would seem the Director is placed at a disadvantage when trying to undertake his legislative duties.

It is recommended that Pohnpei Government consider amending the status of the Director on the Board and allow for him to become a sitting member on the Board. (**Recommendation 8 refers**).

Below - Audit Table 5 – incorporating Performance Indicators 29 to 38

	Source	Criteria	Means of Verification	Compliance Status
29.	Pohnpei Code of Law Education Act 1999 Title II Part 2 §2-2	There is hereby established a Pohnpei Board of Education which shall consist of six members. Four or five shall be appointed by the Governor and appointed from the following respective groups: (a) COM-FSM President, or other senior executive of the College of Micronesia-FSM, resident in Pohnpei; (b) A private school representative; (c) A parent-teacher association representative; and (d) A community sector representative	Membership representatives on the Pohnpei Board of Education fulfil statutory requirements.	Compliance All newly nominated representatives of the Pohnpei Board of Education appointed by the Governor are from the legislative respective groups.
30.	Pohnpei Code of Law Education Act 1999 Title II Part 2 §2-2	The Director SHALL serve as an ex-officio, non-voting member of the Board.	Level of representation by the Director of Education on the Board.	Compliance The Director is an ex-officio member. However the board has not sat since August 2008.
31.	Pohnpei Code of Law Education Act 1999 Title III Part 2 §2-3	Meetings shall be called and held at the call of the Chairman, or by a quorum, at least quarterly, and, in addition, as often as maybe necessary for the transaction of Department business.	1. Minutes of at least three meetings demonstrating a quorum was present.	Partial Compliance Minutes from meetings show that meetings are infrequent at best. October 2005 April, June, October 2006 February, August, October 2007 August 2008 Nil 2009 Nil 2010 Only 2006 meet the legislative requirements.
32.	Pohnpei Code of Law Education Act 1999 Title III Part 2	Meetings shall be open to the public and only after adequate notice has been given	2. List of public persons attending meetings and adequate notice of upcoming meetings	Non-Compliance From minutes obtained it appears the meeting are not open to members of the public and further the public is not

	§2-3			being notified of when meetings are taking place which allows for attendance.
33.	Pohnpei Code of Law Education Act 1999 Title III Part 2 §2-3	Members shall be notified of meetings by the Director, in writing at least two weeks before the date of any meeting.	3. Three examples of written notifications with two weeks' notice.	Non-Compliance No notification of meetings by the Director in writing showing at least two weeks notice prior to the meeting date. Notification of meetings may have been verbal.
34.	Pohnpei Code of Law Education Act 1999 Title II Part 2 §2-5 In accordance with FSMC Title 40	The powers and responsibilities of the Board shall include, but not be limited to, the following: 1. Establishing a comprehensive educational development plan consistent with the overall plans and objectives of the state government; 2. Defining specific educational objectives for the state for immediate implementation, and advising the Governor on the integration of those objective with the objectives of other departments and agencies of the state government;	1. Level of advice provided on the development of an educational development plan on at least three separate occasions 2. Three examples of consistency of educational development with State Government objectives	No determination was made on this criterion. No examples of Board recommendations or establishment in comprehensive educational development plans or specific educational objectives for implementation were observed in the files. No evidence of examples of consistency in education development with state objectives were found in files relating to the Board of Education.
35.	Pohnpei Code of Law Education Act 1999 Title II Part 2 §2-5 In accordance with FSMC Title 40	3. Assisting the Director in recruiting and hiring key education personnel;	3. Three examples of level of assistance provided to Director in recruiting and hiring personnel ensuring compliance with PS PSSR and Title 40 FSMC – 105	Non-Compliance As the Board in effect has not meet since August of 2008 and there has been a change of Director since that time, the Board has not provided this Director any assistance in the recruitment or hiring of personnel for the DOE.
36.	Pohnpei Code of Law Education Act 1999 Title II Part 2 §2-5	4. Adopting minimum criteria and prescribing terms for the issuance of certificates for principals and teachers, and for the renewal thereof;	4. Number of teachers certified, ensuring criteria implemented. 5. Three examples of Pohnpei-wide curriculum standards and guides adopted by the board. (FSMC	Non-Compliance The Board has not met since August 2008. However records show the Board of Education has requested the Director ensure compliance with certification for

37.	In accordance with FSMC Title 40	5. Adopting Pohnpei-wide curriculum standards and guides; 6. Adopting procedures and minimum standards for issuance and renewal of permits for the operation of private schools'	Title 40 - 110) 6. Examples of procedures adopted for issuances for permits for operation of private schools (FSMC Title 40 - 109).	principals and teachers. Further, adopting Pohnpei-wide curriculum standards and guides, and stating these standards must be approved by the Board and in accordance with Title 40. But no action has been taken since this time.
	Pohnpei Code of Law Education Act 1999 Title II Part 2 §2-5 In accordance with FSMC Title 40	7. Adopting and modifying Department rules, regulations and policies.	7. Examples of adoption of rules regulations and policies.	Non-Compliance The Board has shown no adopting or modification of department rules, regulations and policies.
38.	Pohnpei Code of Law Education Act 1999 Title V §5-1	Regulation of Private Schools. Every private school shall be subject to regulation by the Department. The Board of Education shall prescribe uniform, minimum standards for the certification of the principals, teachers and curriculum of private primary and secondary schools operating within the state, which standards shall be in substantial conformance with the standards applicable to the principals, teachers and curriculums of the public schools of this state.	1. Copies of standards set for private schools regarding certification of principals and teachers, ensuring conformance with state standards. 2. Copies of standards set for private schools regarding curriculum ensuring compliance with national and state standards.	Non-Compliance No evidence of standards set for private schools regarding certification of principals and teachers ensuring conformance with state standards, by the Board of Education. No copies of standards set by the Board for private schools regarding curriculum to ensure compliance was located. These standards were to be in conformance with public schools of the State of Pohnpei.

Language Commission

The Language Commission was established by legislation in 2006, but to date the Governor has not nominated any member or set a budget to allow for implantation of such a Commission. The Commission has significant imperatives regarding the implementation of local language within the curriculum for schools. Local language is mentioned a number of times within the strategic plan with milestones to be achieved.

Below - Audit Table 6 – incorporating Performance Indicators 39 to 47

	Source	Criteria	Means of Verification	Compliance Status
39.	S.L. 6L-83-06 §3 (1)	The Commission's duties and functions shall be to act in an advisory capacity to the State Government with respect to all issues relating to Pohnpeian languages. The powers and responsibilities of the Commission shall include, but not limited to, the following: 1. Review the state's comprehensive educational development plan to ensure that the plan provides adequate attention to the preservation of Pohnpeian languages;	1. Examples of plan displaying preservation of Pohnpeian languages.	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
40.	S.L. 6L-83-06 §3 (1)	2. Defining specific language initiatives for the State, and advising the Governor on the integration of those initiatives with the objectives of other departments and agencies of the State Government;	2. Examples of specific language initiatives	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
41.	S.L. 6L-83-06 §3 (1)	3. Adopting, maintaining, and continuously improving official Pohnpei system of vocabulary, grammar, orthography, counting systems, and honorific language;	3. Examples of consistency of Pohnpei systems of vernacular studies.	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot

				take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
42.	S.L. 6L-83-06 §3 (1)	4. Advising, reviewing and commenting upon educational programs that inform the public on the value and to the preservation of Pohnpeian languages;	4. Extent of comments to public on value and preservation of Pohnpeian languages.	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
43.	S.L. 6L-83-06 §3 (1)	5. Encouraging, in cooperation with appropriate public and private agencies and institutions, educational and other programs designed to further the use of Pohnpeian languages;	5. Level of advice and encouragement provided on the development and design on Pohnpeian language programs.	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
44.	S.L. 6L-83-06 §3 (1)	6. Advising and reviewing proposed and planned publication of books, pamphlets, periodicals, instructional materials and other publications on Pohnpeian systems of language, including vocabulary, grammar, orthography, counting systems, and honorific language;	6. Level of advice and appropriate review conducted on resources utilized for the Pohnpeian systems program of learning.	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
45.	S.L. 6L-83-06 §3 (1)	7. Developing radio programs designed to further the use of Pohnpeian languages;	7. Examples of radio programs developed and initiated.	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in

				members of this board and gives them a working budget.
46.	S.L. 6L-83-06 §3 (1)	8. Informing and educating National, State and Local Governments, other nations and international organizations, and private groups and individuals as to the Commission's authorized activities; and	8. Examples of information packages provided interested organizations, internal and external to the FSM.	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
47.	S.L. 6L-83-06 §3 (1)	9. Preparing and submitting to the Legislature and the Governor an annual budget and an annual program and status report, describing the activities of the Commission for the previous year and setting forth its goals and strategies for the future.	9. Examples of budgets submitted and status reports outlining goals and strategies for the future	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.

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 has yet to gain the necessary qualifications and most of those who are not currently qualified are working towards that achievement.

The recruitment process for personnel (whether the staff member elects to enter the PSS or contract arrangements) is 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 develops 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, the Director will make the final decision as to who will be employed by DOE.

The below table provides details of staff qualifications per location.

No.	Location	MA / MS	BA / BS	AA / AS	Nil	Total
1.	Central Office DOE	2	1	16	0	
2.	Awak Elementary School	0	1	10	1	12
3.	Enipein Elementary School	0	0	11	1	12
4.	ESDM Elementary School	0	0	9	1	10
5.	Kapingamarangi Elementary School	0	0	7	0	7
5.	Kolonia Elementary School	0	5	28	1	34
6.	Lewetik Elementary School	0	0	5	0	5
7.	Lukop Elementary School	0	1	10	1	12
8.	Mand Elementary School	0	1	5	1	7
9.	Mwoakilloa Elementary School	0	0	5	0	5
10.	Nanpei Memorial Elementary School	0	0	12	0	12
11.	Nett Elementary School	0	1	37	1	39
12.	Nukuoro Elementary School	0	0	4	1	5
13.	Ohmine Elementary School	0	2	35	1	38
14.	Pakein Elementary School	0	0	2	0	2
15.	Palikir Elementary School	0	1	19	1	21
16.	Parem Elementary School	0	0	8	0	8
17.	Pehleing Elementary School	0	1	11	1	13
18.	Pingelap Elementary School	0	1	6	0	7

19.	Pohnlangas Elementary School	0	0	7	0	7
20.	Rohi Elementary School	0	1	9	0	10
21.	RSP Elementary School	0	1	9	1	11
22.	Saladak Elementary School	0	0	19	0	19
23.	Salapwuk Elementary School	0	0	2	1	3
24.	Sapwalap Elementary School	0	0	17	1	18
25.	Sapwuafik Elementary School	0	2	5	0	7
26.	Seinwar Elementary School	0	0	13	0	13
27.	Sekere Elementary School	0	0	20	1	21
28.	Sokehs Powe Elementary School	0	3	13	0	16
29.	Temwen Elementary School	0	0	6	0	6
30.	Wapar Elementary School	0	0	6	1	7
31.	Wone Elementary School	0	0	15	14	17
32.	Madolenihmw High School	0	16	7	0	23
33.	Nanpei Memorial High School	0	12	9	1	22
34.	PICS High School	1	57	7	2	67
	Total					

Note 1 – 2 different sources of information were provided to the auditor. One indicated that there are 388 teachers at the 34 schools, another indicated 421. (excluding Principals and vice Principals.)

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

The key stakeholder in the employment of persons within the Department is the Division of Personnel. Given the importance of finding the most appropriate and suitable persons for positions within the education system, this audit feels that the DOE should be able to play far more significant role in the assessment of all candidates for positions.

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 7 – incorporating Performance Indicators 48 to 54

	Source	Criteria	Means of Verification	Compliance Status
48.	Pohnpei State Code of Law Education Act 1999 Division 1 Title 9 § 2-104	The Pohnpei Public Service System shall be administered in accordance with the merit principles set forth below: (1) Equal opportunity for all regardless of sex, race, age, religion, political affiliation, ancestry, family 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.	Partial Compliance The Pohnpei DOE has adopted the minimum qualification set out in the National Teacher Certification Program. Twenty-Three (23 – 4.4%) of teachers are assigned to teaching duties who do not meet the minimum standard. Out of the 34 school facilities, only 3 (9%) of the Principals are females. This suggests that there is a gender bias in the selection of females to senior positions within the department.
49.	Pohnpei State Code of Law Education Act 1999 Division 1, Title 9 § 2-104	(2) No discrimination against any person because of a physical handicap unconnected to his ability to perform effectively the duties of the position in which he is employed or in which he is seeking employment; PROVIDED that the employment of said physically handicapped person will not be hazardous to him nor endanger the health and safety of others.	Analysis of employed with handicap unconnected to the ability to perform their duties.	Compliance There is no evidence that the Department of Education discriminates against persons with handicaps. However, the Department of Personnel provides the list of possible candidates for DOE to select from.
50.	Pohnpei State Code of Law Education Act 1999 Title IV Part 1 § 4-1	Qualifications for Principals. Principals, and those serving in that capacity, shall meet the Department's certification requirements and shall have served as a teacher for not less than five years, at least one year of which shall have been served as a teacher or exchange principal in the schools of the state.	Minimum qualification set by department for teacher to become principal at the appropriate level school.	Compliance Evidence was provided that all principals in positions have the required level of certification and the required number of years served at level prior to becoming principal.

<p>51.</p>	<p>Pohnpei State Code of Law Education Act 1999 Title IV Part 1 § 4-2</p>	<p>Consideration in appointing teachers. In the appointment of teachers by the Director, preference shall be given to residents of the state, of the same standing, grade, or rating, as non-resident candidates. The rating of a teacher shall not depend upon the number of pupils promoted or graduated, but upon the length of service, efficiency and ability of the teacher. Persons appointed to teaching positions in primary schools shall have at least an associate's degree, and persons appointed to teaching positions in secondary schools shall have at least a bachelor's degree, from an accredited institution of higher learning. In addition, all persons appointed to teaching positions in the Division of Pre-School and Primary Education shall be fluent in the Pohnpeian language.</p>	<p>Number of teachers certified. Consideration given to those who are residents of the State.</p> <p>Evidence of Primary school teachers to have minimum standard of Associate Degree and Secondary School Teachers to have Bachelor's Degree.</p> <p>Evidence of Teachers in Pre-School and Primary School being fluent in Pohnpeian Language.</p>	<p>Partial Compliance</p> <p>There is no evidence of a State certification; however, the National Teacher Certification is adopted. It was established that there is currently about 18 teachers who do not meet the minimum standards for National Certification.</p> <p>Teachers engaged in teaching positions in the Division of Pre-School and Primary Education is fluent in the Pohnpeian language, however, teachers at the ECE level are the majority without the required qualifications.</p>
<p>52.</p>	<p>Pohnpei State Code of Law Education Act 1999 Title IV Part 1 § 4-3 (1)</p>	<p>Teachers; certification; suspension; revocation.</p> <p>No person shall serve as a teacher in any public or private school in the state without first having been certified by the Department and issued a certificate, without cost, in such form and for such duration as the Board determines. The Board shall establish types of certificates in the educational field, and the requirements to qualify for each type of certificate.</p>	<p>Evidence of teachers without minimum certification being suspended or having teachers certification revoked.</p> <p>Evidence of Board of Education establishing types of certificates and qualification requirements.</p>	<p>Non-Compliance</p> <p>There is no evidence that any teacher without the required certification has been suspended.</p> <p>There is no evidence the Board of Education has developed or implemented types of certificates for teachers and the necessary qualification requirements for each level of certificate.</p>

53.	Pohnpei State Code of Law Education Act 1999 Title IV Part 1 § 4-3 (2)	The Director shall establish procedures to verify the authority of certificates and other documentation proffered by prospective teachers who are not citizens of the Federated States of Micronesia.	Evidence of verification procedures for certificates obtained from teachers who are not FSM citizens.	Compliance Evidence is obtained from those persons in the form of a certified copy of the documentation provided. Documentation that is not certified will not be accepted by the Department or Director.
54.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (6) Ref: FSMC Title 40 -110	Hire, certify, and evaluate department personnel, in coordination with the Division of Personnel, Labor and Manpower Development.	Requirements of Division of Personnel, Labor and Manpower Development are followed and implemented in the form of staff performance reviews.	Non-Compliance There was no evidence available showing performance evaluation by supervisors done periodically on employees' under their supervision. No staff members have been assessed on their work performance or in accordance with the PSS meet with personally to establish performances. Teachers are observed in classroom environments and the IOTA form is used and discussions are undertaken in pre and post meetings. There is no written record of these meetings placed in the teacher's personnel files.

Assignment of Personnel

Assignment of personnel is an area where the implementation appears not to be guided by the operational procedures the Department work under. However, on discussions it was explored that the approaches currently taken in the area of assignment and re-assignment of personnel was in the best interest of both the teachers, schools and students.

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 assigning personnel, issues such as teacher certification, appropriate qualifications and skills are taken into consideration, but further, the teachers need for travel and wherever possible the impact on the school the teacher is going to be transferred from and too.

Acceptable class sizes where teacher / student ratios are within the legislative requirement where determined during the course of the audit. During workshops and interviews with teachers and principals discussion were held on the sizes of classes and teachers ability to appropriately teach students within larger sizes, and the determination of ensuring learning is taking place by all students. Approximately half the classes were within the required ratio, however, those numbers that had classes excess of the number where in some instances almost double in size. One example was a grade six class that had 41 students to one teacher.

Curriculum Subject Specialists are assigned to specific schools and visit these schools on quarterly bases or as required. Curriculum Specialists assist these schools to ensure the correct implementation of the curriculum framework and the development of lesson plans with milestones and benchmarks for students to meet. Discussions with Curriculum Subject Specialists indicated they would see greater benefit in being able to visit all the schools on a more regular base ensuring implementation and consistency of developed standards.

During discussions with teachers who participated in focus workshops, they indicated that Specialists were not providing beneficial assistance or guidance in the new standards. Teachers, when further asked if they had contacted Specialists when having problems with the new standards, it was found that nearly all teachers had not contacted the relevant Specialist for assistance, as they had resolved the problem through peer support during staff meetings. However, those teachers who did contact Specialists stated they were not provided appropriate assistance as the Specialist was either not available, unable to come to the school due to lack of available transport, or told they would contact them back when they had researched the problem (but never called back).

Other than the NST there is no real assessment being undertaken on students to ensure they are achieving the benchmarks and milestones. During focus group workshops teachers were asked if they undertake weekly assessment to ensure milestones and benchmarks are being meet, however it was found that very few actually conducted weekly assessments. Simple weekly 'pop' quizzes could be given to students to ensure learning has taken place and the relevant milestones and benchmarks have been obtained. The Curriculum Subject Specialists could further assist teachers with the development of quarterly testing for all grades to ensure learning is taking place.

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 (*Pohnpei State Government – Government Expenditure Summary*):

Location	Principal	V/ Principal	Chief	Elementary Teachers	Secondary Teacher	Support Staff	Other Staff	Total
Curriculum Development	0	0	1					
Special Education	0	0	1	32 (1 Vacant)	17	5	21(3 Vacant)	76
Early Childhood Education Program	0	0	1	0	0	17	4	22
Workforce and Skills Training	0	0	0	0	0	6	0	6
Curriculum, Instructional Development & Specialized Ed.	0	0	1	0	0	11	9	21
Primary Education	0	0	1	1	0	2	0	4
Secondary Education	1	0	1	0		0	0	2
Vocational Education Program	0	0	1	0	0	3	0	4
School Improvement Program	0	0	V	0	0	5	0	5
Awak Elementary School	0	0	0	11	0	5	0	16
Enipein Elementary School	1	0	0	11	0	4	0	15
ESDM Elementary School	1	0	0	9	0	2	0	11
Kapingamarangi Elementary School	1	0	0	7	0	0	0	7
Kolonia Elementary School	1	1	0	33	0	6	0	39
Lewetik Elementary School	0	0	0	5	0	1	0	6
Lukop Elementary School	1	0	0	11	0	5	0	16
Mand Elementary School	1	0	0	6	0	3	0	9
Mwoakilloa Elementary School	1	0	0	5	0	1	0	6
Nanpei Memorial Elementary School	1	0	0	12	0	3	0	15
Nett Elementary School	1	1	0	38	0	8	0	46
Nukuoro Elementary School	1	0	0	5	0	1	0	6
Ohmine Elementary School	1	1	0	37	0	4	0	41
Pakein Elementary School	0	0	0	2	0	1	0	3
Palikir Elementary School	1	0	0	20	0	5	0	25
Parem Elementary School	1	0	0	8	0	2	0	10
Pehleng Elementary School	1	0	0	12	0	3	0	15
Pingelap Elementary School	1	0	0	7	0	2	0	9

Management Audit of Pohnpei State Department of Education

Pohnlangas Elementary School	1	0	0	7	0	3	0	10
Rohi Elementary School	1	0	0	11	0	1	0	12
RSP Elementary School	1	0	0	10	0	2	0	12
Saladak Elementary School	1	0	0	19	0	3	0	22
Salapwuk Elementary School	0	0	0	2	0	0	0	2
Sapwalap Elementary School	1	0	0	17	0	4	0	21
Sapwuafik Elementary School	1	0	0	7	0	2	0	9
Seinwar Elementary School	1	0	0	13	0	1	0	14
Sekere Elementary School	1	0	0	20	0	4	0	24
Sokehs Powe Elementary School	1	0	0	16	0	3	0	19
Temwen Elementary School	1	0	0	6	0	1	0	7
Wapar Elementary School	0	0	0	6	0	2	0	8
Wone Elementary School	1	0	0	15	0	5	0	20
Madolenihmw High School	1	0	0	0	23	1	6	30
Nanpei Memorial High School	1	0	0	0	22	2	6	30
PICS High School	1	2	0	0	67	7	19	93
Total	30	4	7	421	129	142	65	798

* - Student data based on Beginning 2009-2010 school year Enrolments

** - Total does not include vacant positions

The below table indicates the Ratio of Teachers / per number of students (Pohnpei DOE SY09-10 data).

Location	No. Teachers*	No. Students	Ratio
Awak Elementary School	11	219	1:19.9
Enipein Elementary School	11	229	1:20.8
ESDM Elementary School	9	198	1:22
Kapingamarangi Elementary School	7	131	1:18.7
Kolonia Elementary School	33	736	1:22.3
Lewetik Elementary School	5	59	1:11.8
Lukop Elementary School	11	245	1:22.3
Mand Elementary School	6	87	1:14.5
Mwoakilloa Elementary School	5	27	1:5.4
Nanpei Memorial Elementary School	12	256	1:21.3
Nett Elementary School	38	968	1:24.5

Nukuoro Elementary School	5	71	1:14.2
Ohmine Elementary School	37	798	1:21.6
Pakein Elementary School	2	32	1:16
Palikir Elementary School	20	594	1:29.7
Parem Elementary School	8	83	1:10.4
Pehleleng Elementary School	12	317	1:26.4
Pingelap Elementary School	7	35	1:5
Pohnlangas Elementary School	7	140	1:20
Rohi Elementary School	11	158	1:14.4
RSP Elementary School	10	181	1:18.1
Saladak Elementary School	19	394	1:20.7
Salapwuk Elementary School	2	82	1:41
Sapwalap Elementary School	17	383	1:22.5
Sapwuaifik Elementary School	7	124	1:17.7
Seinwar Elementary School	13	294	1:22.6
Sekere Elementary School	20	321	1:16.1
Sokehs Powe Elementary School	16	234	1:14.6
Temwen Elementary School	6	70	1:11.7
Wapar Elementary School	6	128	1:21.3
Wone Elementary School	15	243	1:16.2
	388	7837	1:27.2
Madolenihmw High School	23	418	1:18.2
Nanpei Memorial High School	22	584	1:26.5
PICS High School	67	1461	1:21.8
Total	112	2463	1:22

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

The teacher/student ratio for Pohnpei DOE for 09-10 is 1:22. Given the decline in student numbers over the last 5 years there appears to be a reduction in teacher numbers commensurate with declining student Enrolments.

With the exception of Pingelap Elementary School – an isolated community primarily accessible by boat or plane from the main island of Pohnpei which has the ratio of 1:5, the ratio of teachers to students in Elementary Schools ranges between 1:5 to 1:29 (1:27 average). There appears to

be some inconsistency in level of teacher / student ratios, indicating teachers may not be utilized to their best and most appropriate capabilities in assignment tasking. School ratio in Secondary Schools ranges between 1:18.2 to 1:26.5 (1:22 average for Secondary).

It is recommended that where teacher student ration exceed 1:20 consideration should be given to allocation of additional teaching staff. **(Recommendation 10 refers).**

The Department of Education records (SY 09-10) indicate teacher strength of 500. The Pohnpei State Government Expenditure list indicated personnel strength of 531.

The 2010 Pohnpei SEG Integrated Budget Report contained the following information regarding teacher allocations for the SY 09-10:

Schools	Total	Regular	Special Ed	ECE
Primary Education	3	3	0	0
Pohnpei ECE Center	17	0	0	17
Awak Elementary School	15	12	1	2
Enipein Elementary School	12	8	1	3
ESDM Elementary School	10	8	0	2
Kapingamarangi Elementary School	5	5	0	0
Kolonia Elementary School	34	29	3	2
Lewetik Elementary School	5	4	1	0
Lukop Elementary School	11	6	1	4
Mand Elementary School	6	3	1	2
Mwoakilloa Elementary School	3	2	1	0
Nanpei Memorial Elementary School	9	7	2	0
Nett Elementary School	41	33	2	6
Nukuoro Elementary School	4	3	1	0
Ohmine Elementary School	37	33	2	2
Pakein Elementary School	2	1	1	0
Palikir Elementary School	22	18	1	3
Parem Elementary School	7	5	1	1
Pehleng Elementary School	12	9	1	2
Pingelap Elementary School	5	4	1	0
Pohnlangas Elementary School	8	7	1	0

Rohi Elementary School	9	8	1	0
RSP Elementary School	8	6	0	2
Saladak Elementary School	19	16	1	2
Salapwuk Elementary School	3	3	0	0
Sapwalap Elementary School	16	14	2	0
Sapwuafik Elementary School	8	6	1	1
Seinwar Elementary School	13	12	1	0
Sekere Elementary School	21	17	2	2
Sokehs Powe Elementary School	17	14	1	2
Temwen Elementary School	5	4	1	0
Wapar Elementary School	6	4	0	2
Wone Elementary School	17	12	1	4
Total	410	316	33	61
Secondary Education				
PICS	73	66	7	0
Madolenihmw High School	24	20	4	0
Napei Memorial High School	24	22	2	0
Total	121	108	13	0

Student Enrolments from the SY 05-06 to 09-10 have declined by 37 (-5.8%). (SY 08-09 there was an actual increase in school number by 36 (6%) compared to SY 09-10.)

Location	05-06	06-07	08-09	09-10	% change*
Awak Elementary School	247	238	224	219	-11.3%
Enipein Elementary School	244	262	257	229	-6.1%
ESDM Elementary School	194	215	228	198	+2%
Kapingamarangi Elementary School	140	135	128	131	-6.42%
Kolonia Elementary School	726	744	752	736	+1.38%
Lewetik Elementary School	87	84	64	59	-32.18%
Lukop Elementary School	287	285	258	245	+14.63%
Mand Elementary School	89	104	90	87	-2.25%
Mwoakilloa Elementary School	40	38	33	27	-32.5%

Nanpei Memorial Elementary School	219	215	220	256	+16.89%
Nett Elementary School	1035	1050	1012	968	-6.47%
Nukuoro Elementary School	78	64	61	71	-8.97%
Ohmine Elementary School	880	890	873	798	-9.32%
Pakein Elementary School	41	45	37	32	-21.95%
Palikir Elementary School	474	512	543	594	+25.3%
Parem Elementary School	123	89	99	83	-32.52%
Pehleing Elementary School	275	312	294	317	+15.27%
Pingelap Elementary School	93	79	56	35	-63.37%
Pohnlangas Elementary School	229	162	149	140	-38.9%
Rohi Elementary School	145	159	152	158	+8.96
RSP Elementary School	194	186	178	181	-6.7%
Saladak Elementary School	383	396	415	394	+2.87%
Salapwuk Elementary School	70	86	82	82	+17.14%
Sapwalap Elementary School	366	411	386	383	+4.64%
Sapwuafik Elementary School	145	167	148	124	-14.48%
Seinwar Elementary School	297	348	329	294	-1%
Sekere Elementary School	351	345	348	321	-8.55%
Sokehs Powe Elementary School	255	247	225	234	-8.24%
Temwen Elementary School	76	87	67	70	-7.89%
Wapar Elementary School	128	143	142	128	0%
Wone Elementary School	288	283	240	243	-15.63%
Madolenihmw High School	430	398	405	418	-2.79%
Nanpei Memorial High School	367	455	600	584	+59.13%
PICS High School	1642	1679	1534	1461	-11.02%
Total	10,735	10,964	10,6291	10,300	-4.05%

* - % change between 05-06 and 09-10

There was an increase in enrolments between 06-07 and 08-09 year of 6.27%. It is interesting to note that Yap School enrolments for the period between 2004 and 2007 showed a decline of -9.37% and Kosrae for the period between 2008 and 2009 and the previous year is a decline -5.3%.

Pohnpei actually showed an increase in the year 2008 and 2009 of 6.27%. This may indicate an urban drift from other states to Pohnpei. However, the subsequent year of 09-10 there was a decline in school enrolment of 6%. Given inconsistent increases and decreases in enrolments in recent years it is critical that Pohnpei State DOE closely school enrolments on an annual base. Such fluctuations may be attributed to urban drift from other states if this is the case a range of culture will need to be addressed and monitored. Pohnpei State appears to be in a unique situations and difficult for school administration to monitor. In recent years other States have witnessed decreases in enrolment whereas Pohnpei as witnessed significant increases and decreases.

Below - Audit Table 8 – incorporating Performance Indicators 55 to 59

	Source	Criteria	Means of Verification	Compliance Status
55.	No documented policies and procedures exist. Adopted as current practice.	The State Director shall make all assignments of personnel to schools on the best interest of the school system.	DOE criteria for assignment to schools. Teacher assignment data. Equity in assignments.	Partial Compliance No documented policies relating to assignments were provided. Advice from Director on approach was provided during interviews. However, some schools appear to have a large student teacher ratio which is not in the best interest of the student or the teachers.
56.	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.	Partial Compliance Again this criteria had no documented polices however, the approach taken by the Director considered teacher qualifications and certification, school requirements and what was in the best interest of the Educational System. Teacher numbers for each of the schools need to be reviewed and addressed for teacher / student ratios.
57.	Pohnpei State Public Service Systems Regulations Part 1 Policy 101	Acceptable student / teacher ratios, governing class size for instruction will be based on the following general guidelines: 101.1 Elementary School: Class size for regular program	Evidence of appropriate allocation of teacher / student numbers in accordance with policy.	Partial Compliance During the course of the audit, it was found that at least half of the class sizes met the guidelines as set out in the Pohnpei State Public Service Systems Regulations. However, some class sizes are over the maximum allowance. Some of these classes have been

		<p>Grade K Max 20/1 Min 10/1 Grades 1-3 Max 25/1 Min 15/1 Grades 4-6 Max 25/1 Min 15/1</p> <p>101.2 Jr. High School: Class size for regular program</p> <p>Grade 7-8 Max 20/1 Min 10/1</p> <p>101.3 High School: Class size for regular program</p> <p>Grade 9-12 Max 20/1 Min 10/1</p> <p>101.4 Vocational Education: Class size</p> <p>Teacher Program Max 30/1 Min 15/1 Business Program Max 30/1 Min 15/1 Trades Program Max 20/1 Min 10/1 Computer Program Max 40/1 Min 20/1</p> <p>101.5 Home Arts: Max 25/1 Min 20/1 Agriculture: Max 25/1 Min 20/1</p> <p>101.6 Special Education and Head-start classes shall be governed by the applicable FSM Regulations.</p>		<p>allocated teacher aides where available to assist the teacher, this does not happen at all schools.</p>
58.	<p>Pohnpei State Public Service Systems Regulations Part 1 Policy 101</p>	<p>Exceptions to the parameters established in the policy will be made only with the express approval of the Director of Education, with</p>	<p>Examples of approval for changes from Director with reviews from Board showing relevant justification.</p>	<p>Non Compliance There was no evidence provided showing any school with oversized classes seeking approval from Director</p>

		justification available to the Board upon request for review purposes.		to maintain oversized classes, or providing a written review through the Director to Board of Education showing justification for the continuation of the oversized classes.
59.	No documented policies and procedures exists. Adopted as current practice at a local level.	Principles will manage use of Curriculum Subject Specialists will be based upon: <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. Evidence of allocation of Curriculum Subject Specialists. 2. Evidence of Curriculum Subject Specialists' work programs. 	<p>Partial Compliance</p> <p>Curriculum Specialist is assigned to the specialist curriculum areas. There is evidence of Specialists having developed instructional material plans for each of the specialist areas. Specialists are assigned schools which they visit on a quarterly bases, to assist teachers with instructional needs however, Specialists do attend to other schools on a as need bases. Some schools stated they had not been visited by a curriculum specialist at all.</p>

Services for Children with Disabilities

The Pohnpei Department of Education Special Education Program currently DOE SPED program provides services to 704 active cases with another 109 pending. During the recent monitoring visit the DOE SPED received commendation in several of its areas of service and is fully meeting the requirements of the Special Education Procedural Manual, according to the October 5 2009 Monitoring Report which was extremely praiseworthy and complementary to the department in the area of the SPED program. However, the program did go on to find that while the six outstanding areas of non-compliance had been corrected and verified during the monitoring visit, an additional seven new findings of non-compliance were made during the onsite monitoring visit.

During this audit and in discussions with the Acting Chief of SPED it was established that three of the non-compliance findings have been rectified with work being undertaken on the outstanding four.

The report made a number of commendations to the department and the SPED program including

- Special Education Program has teachers on all outer island schools.
- Total of 18 seniors with IEPs who graduated from the 08-09 school year.
- Transition Program is successfully placing all graduating seniors with IEPs in the WIA funded job training program.
- Effective organization and excellent summary of records of students receiving RSA services, further efficient organization of schedule for delivery of services around limited transportation available.
- Excellent job by Supervisor for Madolenimw schools of tracking students with current IEPs in schools.
- Properly constituted Special Education Advisory Council which meets regularly and provides input concerning special education services.

In so far as non compliance in areas (as identified in the report dated October 5 2009), the report noted:

- Seven of the 20 students were being provided services as specified within the IEPs
- Staff and supervisors not clear about the purpose of monitoring and how to conduct monitoring, 'inclusion' programs need to be specifically defined
- SITS data system was not being fully implemented in that pending cases were not being entered until permission was received before entering, 20 student records reviewed determined that all 20 had some technical error on the form
- Two students were not receiving services described in their IEPs due to ineffective assignment of special education staff
- Adaptive equipment not being provided, funds not being allocated to allow for identified needs to be meet
- No evidence of monitoring reports or corrective actions.

The auditor was advised during discussions with the Acting Chief of SPED that these areas of non-compliance are being addressed prior to the next monitoring visit.

Below - Audit Table 9 – incorporating Performance Indicators 60 to 67

	Source	Criteria	Means of Verification	Compliance Status
60.	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.	Partial Compliance The most recent Focused Monitoring Report (October 2009) noted significant improvement in the efforts of the Pohnpei 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 PDOE correcting all areas of outstanding non compliance from previous years and the timely submission of LPP and Quarterly Progress Reports. However, there were seven new areas of non-compliance identified during the monitoring visit.
61.	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 October 2009 highlighted the improvement by PDOE in the timely submission of LPP and Quarterly Progress Reports. The Report commended the PDOE for improvements in the quality of special education program activities with the State Education system and the implementation of their LPP.
62.	§236. Procedure to ensure efforts. Source: COM PL 7-55 § 6; TT	The Secretary of Education shall establish, in cooperation with the Secretary of the Department of Health Services	Copies of last 3 monitoring reports.	Partial Compliance While the Focused Monitoring Report found that there had been improvement in the quality of services

	Code 1980, 41 TTC 206; PL 8-21 § 6.	and each State Director of Education , procedures to ensure the ongoing education, identification, location and evaluation of children with disabilities.		within the special education program in Pohnpei, there is still significant areas of improvement required as nominated within the monitoring report.
63.	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 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.
64.		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 "actions to be taken" based on the recommendations developed for the school.	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".	Partial Compliance. Monitoring visits are conducted each year. The October 2009 found that over the last 12 months, the Pohnpei DOE had corrected all areas of non compliance for 2008. However, the monitoring review did find another seven areas of non-compliance. The Pohnpei DOE had not corrected all areas on non-compliance from previous years and 2009 was the first time they had been elevated to 'meets requirements' status.

65.		<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>Partial Compliance The Focused Monitoring Report identified that the previous area of non compliance regarding internal monitoring of programs and services had been corrected. The report further found that the Internal Monitoring Action Plan was comprehensive. However, it further stated that there was no evidence of Monitoring Reports or Corrective Actions being taken from findings. There is no person assigned with the responsibility of over-viewing the internal monitoring system and case management process.</p>
66.		<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 the IDEA Part B SPP indicators, including formal complaints, mediation, and due process requests and results.</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 relating to providing full justifications for all procurements and travel and other fiscal requirements. Quarterly reports address all requirements</p>
67.		<p>HESA verification & monitoring, 618 data reports The four LEAs compile and submit the required 618 data to HESA.</p>	<p>Last three 618 data reports.</p>	<p>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</p>

				<p>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 Pohnpei Department of Education does not appear to have any program in place that recognizes students with extraordinary abilities to learn. Data from tests results could to identify those students with outstanding talent in learning and the desire to learn but no in-depth and detailed analysis is performed and utilized to this end.

Below - Audit Table 10 – incorporating Performance Indicator 68

	Source	Criteria	Means of Verification	Compliance Status
68.	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	Non Compliance There is no evidence of any programs to identify and encourage students who demonstrate an astonishing ability to learn. When asked during the interviews of teachers what do gifted programs do you run at the school. No school indicated they have a program that recognizes students that are gifted.

Public Reporting

Meetings are documented and minutes are taken, along with information relayed to the community. However, the information relayed to the community is not documented. Meetings are structured with agendas and are placed on school calendars to ensure parents are aware in advance of scheduled meetings.

As mentioned elsewhere in this report, the Board of Education has not sat since August of 2008 and a new Board has been appointed and has currently had no formal meetings. As Board members are still determining their positions on the Board and 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 11 – incorporating Performance Indicators 69 to 71

	Source	Criteria	Means of Verification	Compliance Status
69.	Pohnpei State Code of Law Education Act 1999 Title II Part 2 § 2-3	Organizations and meetings. Meetings shall be called and held at the call of the chairman, or by a quorum, at least quarterly, and, in addition, as often as may be necessary for the transaction of Department business. Meetings shall be open to the public and shall be held only after adequate public notice has been given.	Examples of minutes from the last three (3) quarterly meetings held showing these meetings were open to the public.	Non Compliance The Board of Education has not sat since August of 2008 with is no documented evidence to indicate they have called a board meeting in 2009 or 2010. The board is newly sworn in and has not had a meeting to appoint positions within the board.
70.	Pohnpei State Code of Law Education Act 1999 Title VII § 7-4	Records; evidence. A department shall cause all of its proceedings and acts to be recorded, and such records, from time to time, but at least annually, to be filed in the department archives. A certified copy of a record, or any portion thereof, when authenticated by the department director, under the department seal, shall be competent evidence in any court, of all that it contains.	<ol style="list-style-type: none"> 1. Three (3) examples of proceedings and acts recorded annually and filed in the department archives. 2. Ensure copies have been certified as a copy. 	Partial Compliance Copies of acts affecting the Department have been filed with the department archives. Copies of acts were not seen to be certified. However, these copies have been authenticated and signed by the Director under the Department seal.

71.	Pohnpei State Code of Law Education Act 1999 Title VII § 7-5	Department publications. A department may prepare or cause to be prepared, printed and published, such reports, pamphlets, duplicates, outlines, brochures, etc., as in the discretion of the department may seem advisable, and sell or otherwise dispose of such publications.	Examples of reports pamphlets which provide information to the general public, last three (3) public reports or pamphlets.	Compliance The Department has published a number of pamphlets as sources of information to the public. These documents have been produced at the discretion of the Department. DOE SPED develop and print a number of flyers/brochures which provide a summary of the Pohnpei State's LPP.
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Role of the Community

Principals and staff members interviewed during workshops and focus groups indicated that PTA's have been established at each of the schools, however, the level of support, participation and involvement by PTA's in school activities varies from school to school. In some instances the principal is the driving force behind the PTA actually being in existence.

In the Pohnpei State Department of Education Strategic Plan, (Strategic Goal 5) outlines the need to '*establish mechanisms that enhance community involvement in instructional support and school operations*'. It is intended that such a goal will devolve greater responsibility onto parents and communities for the improvement of student learning through the development of school community involvement plans. During the audit, there was no mention by any school or administration personnel about progress towards the development of school community involvement plans. These plans would enhance the opportunity for greater involvement in the decisions which affect the use of resources of the community by the schools in the delivery of education services as they relate to values and traditions of the State.

During focus groups teachers indicated that parents were not involved enough in their student's education. Parents did not attend parent / teacher meetings to receive their child's report card.

A 'local school based' management structure would provide staff an opportunity to involve themselves in decisions which ultimately impact on their ability to perform their duties as teachers. Allowing for staff members to contribute in areas such as budget preparation (SIP as done by the principal), problem solving matters involving curriculum, performance review of personnel, staff selection and school scheduling to suit community needs would give a sense of pride and enhance dedication by staff, further staff would have a sense of owner of the school and what happens in it.

For dedicated change management to occur there needs to be a comprehensive action plan in place, which does not permit an ad hoc implementation of a 'Community Based Management' program. It needs to be communicated that PTA's are not intended to interfere in the decisions making process of what curriculum is being taught in schools or the implementation of learning, but in supporting schools. 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 12 – incorporating Performance Indicators 72 to 77

	Source	Criteria	Means of Verification	Compliance Status
72.	Pohnpei State Code of Law Education Act 1999 Title II Part 2 § 1	There is hereby established a Pohnpei Board of Education which shall consist of six (6) members..... Four of the five members appointed by the Governor shall be drawn from the following respective groups: (a) COM-FSM President, or other senior executive of the College of Micronesia - FSM, resident in Pohnpei; (b) A private school representative; (c) A parent-teacher association representative; and (d) A community sector representative.	Evidence that there is a representative from the parent-teacher association. Evidence that there is a representative from the community sector.	Compliance Those members nominated for the Board of Education and in met the legislative criteria.
73.	Compact II (implicit intent)	Initiatives towards Community Based Management practices / structures	Extend the role of community in local school structure.	Partial Compliance DOE needs to be more actively moving towards school centered management processes. When conducting interviews with schools it was established that PTA's were more active in some school communities than others. The task of an integrated Community Based Management structure needs more consideration.
74.	No documented policies and procedures exists. Adopted as current practice at local level.	Parent and Teacher Associations (PTA's) are established in all schools (Private and Public)	Evidence of established PTA's	Compliance All schools have PTA's which are attended by teachers, principals and parents.
75.	No documented policies and procedures exists. Adopted as current practice at a local level.	PTA members are to have regular meetings every quarter or when necessary when important issues arise	Documented evidence of quarterly meetings held	Compliance Meetings are held on quarterly bases with minutes being taken and kept at each of the individual schools. PTA's also undertake to meet on an add needs bases when urgent matters arise in relation to school issues.

76.	No documented policies and procedures exists. Adopted as current practice at a local level. JEMCO indicator 18: Number of parent involvement activities per year.	PTA members are to have greater involvement in school activities, without interfering with the school curriculum.	Demonstrated evidence of parent involvement in school activities	Partial Compliance At the present time PTA's involvement within the school is limited to fund - raising, assisting with cleaning of school grounds and some parents assist with teachers in ECE and grade 1 class. Teachers in higher grades stated parents that were involved would do the work of the students. However, there was no data on the number of parent involvement activities per year.
77.	No documented policies and procedures exists. Adopted as current practice at a local level.	Ensure Principal is an active member of the PTA	Evidence of the level of involvement by the Principal	Compliance All principals are actives members of their PTA's. This was confirmed during workshops and interviews with teachers separate from principal and members of the community. In some instance the principal is the driving force behind the PTA's.

Strategic Planning

The Department of Education developed the Pohnpei 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 (P7) "*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.

It is generally accepted that a Strategic Plan identifies the organizational vision for the delivery of services for the future. Strategic Plans are usually developed for a period of between 3 to 5 years. The Plan forces the organization to ask itself 1. *Where are we now*, 2. *Where do we want to be in the future* and 3. *How do we get to where we want to be*. Identified in this Strategic Plan is a vision and goals of where this department is going and how it is going to achieve its vision.

Strategic Plans are intended to guide for the long term, they are a document that will need to adapt with the operating environment which can alter. Activities will need to be amended to encompass those changes. Further, 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 organization to achieving the vision and goals of the Strategic Plan is through the development and implementation of Divisional annual plans which allows for the achievement of the shared vision. Schools as well as specialist areas within the department should developed their own Annual Plans detailing what actions they will take to achieve their specific goals. Divisional plans cannot sit in isolation from the boarder longer term plan, but must be linked to each other to achieve the overall goals.

As Annual plans are developed yearly, they have the ability and capacity to incorporate local imperatives and changes from the operational environment. Therefore, at the end of each Annual planning cycle, Divisions should review their performance and identify necessary changes required to be incorporated into the next year plan. Additional, quarterly assessments of the Annual plan should take place to ensure goals are being met and imperatives and changes can be incorporated into the plan as necessary.

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.

All schools have provided SIP's, however, these plans are more in line with budgetary requirements than with a real sense of achieving what is reflected within the five Strategic Plan. The SIP's reflected a timeframe of one year, in accordance with the budgetary cycle however, they did not reflect any real activities regarding ongoing improvement to the schools. Assistance was provided to the Principals in initial development of the SIP's with some principals indicating they still did not fully understand the process.

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.

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**).

It is recommended that an accreditation team been established to monitor the progress the Annual Plans and the Strategic Plan to ensure outcomes are being achieved. (**Recommendation 13 refers**).

Below - Audit Table 13 – incorporating Performance Indicators 78 and 79

	Source	Criteria	Means of Verification	Compliance Status
78.	Pohnpei State Education Strategic Plan 2008-2012	Annual work plan (Annual School Improvement Plans) developed and implemented	Current Annual Plans	Partial Compliance All Schools are required to develop School Improvement Plans. These plans are more consistent with the DOE budgetary requirements for the schools than they are with sustainable long term improvements for the schools.
79.	Pohnpei State Education Strategic Plan 2008-2012	Annual formative assessment conducted and report disseminated	Most recent assessments report on activities to date	Partial Compliance There was no evidence of an accreditation team to monitor the progress of the Strategic Plan. No reports have been prepared on the progress of the Strategic Plan. However, chiefs of each of the divisions meet on weekly bases to discuss achievements in regards to plans (strategic).

Early Childhood Education

Enrolment data for SY 09-10 is incomplete (some schools have not completed numbers of enrolments within ECE). The below table indicates enrolments at each school (including gender breakdown), number of teachers and where possible, a determination of ECE teacher/student ratio for SY 09-10. Those schools with no enrolments indicate schools which did not have enough numbers to open an ECE centre.

05-06

Location	M	F	Total
Awak Elementary School	8	9	17
Enipein Elementary School	9	15	24
ESDM Elementary School	11	12	23
Kapingamarangi Elementary School	0	0	0
Kolonia Elementary School	21	21	42
Lewetik Elementary School	0	0	0
Lukop Elementary School	22	13	35
Mand Elementary School	8	13	21
Mwoakilloa Elementary School	0	0	0
Nanpei Memorial Elementary School	8	11	19
Nett Elementary School	38	33	71
Nukuoro Elementary School	0	0	0
Ohmine Elementary School	11	12	23
Pakein Elementary School	0	0	0
Palikir Elementary School	27	15	42
Parem Elementary School	8	8	16
Pehlung Elementary School	11	14	25
Pingelap Elementary School	0	0	0
Pohnlangas Elementary School	0	0	0
Rohi Elementary School	0	0	0
RSP Elementary School	14	13	27
Saladak Elementary School	9	13	22
Salapwuk Elementary School	0	0	0
Sapwalap Elementary School	0	0	0

06-07

Location	M	F	Total
Awak Elementary School	10	14	24
Enipein Elementary School	17	16	33
ESDM Elementary School	4	15	19
Kapingamarangi Elementary School	0	0	0
Kolonia Elementary School	17	15	32
Lewetik Elementary School	0	0	0
Lukop Elementary School	13	19	32
Mand Elementary School	8	7	15
Mwoakilloa Elementary School	0	0	0
Nanpei Memorial Elementary School	9	12	21
Nett Elementary School	26	40	66
Nukuoro Elementary School	0	0	0
Ohmine Elementary School	14	21	35
Pakein Elementary School	0	0	0
Palikir Elementary School	21	16	37
Parem Elementary School	0	0	0
Pehlung Elementary School	24	14	38
Pingelap Elementary School	0	0	0
Pohnlangas Elementary School	0	0	0
Rohi Elementary School	0	0	0
RSP Elementary School	10	10	20
Saladak Elementary School	12	12	24
Salapwuk Elementary School	0	0	0
Sapwalap Elementary School	12	12	24

Sapwuafik Elementary School	0	0	0
Sehpehn Elementary School	20	15	35
Seinwar Elementary School	0	0	0
Sekere Elementary School	14	18	32
Sokehs Powe Elementary School	16	12	28
Temwen Elementary School	0	0	0
Wapar Elementary School	20	20	40
Wone Elementary School	17	16	33
Total Students	326	311	637
Number of Teachers			
Teacher / Student Ratio			

Sapwuafik Elementary School	12	4	16
Seinwar Elementary School	18	14	32
Sekere Elementary School	13	15	28
Sokehs Powe Elementary School	7	10	17
Temwen Elementary School	0	0	0
Wapar Elementary School	15	8	23
Wone Elementary School	18	14	32
Total Students	305	314	619
Number of Teachers			
Teacher / Student Ratio			

08-09

Location	M	F	Total
Awak Elementary School	6	12	18
Enipein Elementary School	18	13	31
ESDM Elementary School	11	13	24
Kapingamarangi Elementary School	0	0	0
Kolonia Elementary School	32	43	75
Lewetik Elementary School	0	0	0
Lukop Elementary School	18	12	30
Mand Elementary School	16	9	25
Mwoakilloa Elementary School	0	0	0
Nanpei Memorial Elementary School	10	13	23
Nett Elementary School	22	38	60
Nukuoro Elementary School	0	0	0
Ohmine Elementary School	25	21	46
Pakein Elementary School	0	0	0
Palikir Elementary School	21	15	36
Parem Elementary School	7	6	13

09-10

Location	M	F	Total
Awak Elementary School	8	11	19
Enipein Elementary School	10	10	20
ESDM Elementary School	11	5	16
Kapingamarangi Elementary School	0	0	0
Kolonia Elementary School	29	33	62
Lewetik Elementary School	0	0	0
Lukop Elementary School	14	14	28
Mand Elementary School	9	7	16
Mwoakilloa Elementary School	0	0	0
Nanpei Memorial Elementary School	27	26	53
Nett Elementary School	27	36	63
Nukuoro Elementary School	0	0	0
Ohmine Elementary School	22	23	45
Pakein Elementary School	0	0	0
Palikir Elementary School	22	19	41
Parem Elementary School	7	7	14

Pehleng Elementary School	10	13	23
Pingelap Elementary School	0	0	0
Pohnlangas Elementary School	0	0	0
Rohi Elementary School	0	0	0
RSP Elementary School	6	11	17
Saladak Elementary School	16	16	32
Salapwuk Elementary School	0	0	0
Sapwalap Elementary School	11	13	24
Sapwuafik Elementary School	10	6	16
Seinwar Elementary School	16	11	27
Sekere Elementary School	14	17	31
Sokehs Powe Elementary School	15	14	29
Temwen Elementary School	0	0	0
Wapar Elementary School	14	12	26
Wone Elementary School	12	18	20
Total Students	310	326	636
Number of Teachers			
Teacher / Student Ratio			

Pehleng Elementary School	17	19	36
Pingelap Elementary School	0	0	0
Pohnlangas Elementary School	0	0	0
Rohi Elementary School	0	0	0
RSP Elementary School	10	7	17
Saladak Elementary School	17	10	27
Salapwuk Elementary School	0	0	0
Sapwalap Elementary School	11	13	24
Sapwuafik Elementary School	5	11	16
Seinwar Elementary School	0	0	0
Sekere Elementary School	16	20	36
Sokehs Powe Elementary School	12	7	19
Temwen Elementary School	0	0	0
Wapar Elementary School	9	6	15
Wone Elementary School	18	15	33
Total Students	301	299	600
Number of Teachers			51
Teacher / Student Ratio			1:11.8

Based on the school totals (SY 05-06 (**637**) and SY 09-10 (**600**)), there is a decline in the number of ECE enrolments of 5.66%. It must be noted that there is a real possibility of ECE Centres in the outer islands being closed down due to lack of numbers required by legislation to remain open. If this happens these children who are unable to go to another centre are placed at a disadvantage of not being able to interact with children their own age and develop learning skills, social skills, motor skills and the ability to interact with other children. This places them behind other children their own age that have access to ECE centres that are able to develop these skills.

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

“Early childhood Education support Education Department Strategic Goals by delivering ECE comprehensive services to five years old children. Early Childhood Education is a child focused and family centred project providing range of services in the area of childhood development and families support services. ECE division continues to ensure that high quality comprehensive services in health, education, nutrition, dental, disability, social services, transition and parental involvements are available to five years old children of Pohnpei. 620 students will be administered for (7 kinds of

assessment) 4,340 screening, assessment and treatment during school year 2009. 620 families will receive appropriate services according to their identified need. 4 out of 10 ECE teachers acquired AS Degree. 129 are funded under the SEG grant."

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

Strategic Goal	Activity	Output	Achievements / results
Provide high quality comprehensive services to 5 year children of Pohnpei	Instructional hours provided by Education Specialist/Classroom Teachers	650 students enrolled during school year 2009	
	Nutrition Specialist/Cooks provide meals services	512 students will be provided with balanced meals. (260,000 meals served)	
	Health/Disability Specialist provide vision, hearing and health treatments to enrolled children	3900 students will be administered for screening, assessment and treatment during school year 2009	
	Dental Nurse/Dental Assistants provide dental treatment		
	Federal Program Coordinator/Social Services Specialists/Parents Involvement Specialist/Transition Specialist/Social Workers maintain student file		
	Transition students to primary school and provide parental training/workshops	650 families will receive appropriate services according to their identified needs	
	Chief ECE and all administrative staffs provide administrative and support services to all service providers		
		Transportation services throughout school year (252,000)	
		2006 Pohnpei Inventory of development will be administered to all ECE students	
		70% (15 out of 22) of ECE teachers acquire AS Degree	

As highlighted under the criteria of Staff Development (P92 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) or on a part time base, after school hours.

The ECE program was previously a federally funded program called the Head Start Program. It has recently become a program of the State Education Department and funded through the Supplemental Education Grant (SEG). Under this new program the Parent Committee has replaced the old Policy Council, this Committee takes a very active role in assisting ECE with the implementation of program goal and objectives within schools and all 21 members attend meetings when called. ECE have undertaken a number of programs to assist parents to better help their children by providing such program as literacy training. Continued support by the Parent Committee will ensure the program continues to successful in being implemented in the ECE centres for the benefit of the children.

Below - Audit Table 14 – incorporating Performance Indicators 80 to 86

	Source	Criteria	Means of Verification	Compliance Status
80.	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 An analysis of enrolment numbers and teacher data confirms that standard classes established for class size and student / teacher ratio are being adhered to. It must be noted that in Pohnpei Education Act 1999 the minimum enrolment is 15 children.
81.	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	Compliance The Policy Council has been replaced with the Parent Committee. This Committee is made up of members from each of the 21 centres. Staff members from ECE along with the Parent Committee and other specialists from DOE undertake a self-assessment of the program and its effectiveness.
82.	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 Evidence was obtained to show there is a curriculum structure established along with a organizational structure however, this structure has not be approved by the Director at this time. The structure gives a broad overview of major functions but does not fully address the mechanisms of staff supervisions and support.
83.		Classroom Teachers. ECE programs must comply with all FSM National and state law and any	Teacher data	Partial Compliance Currently there 7 teachers (these are mostly teacher aids) that are not

		subsequent amendments regarding the qualifications of classroom teachers.		meeting the NDOE minimum standards established. Teachers without certification are being given opportunity to study at COM on a part-time base to acquire the necessary qualification.
84.		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 being conducted by Supervisors of ECE centres along with the principal, specialists and teacher supervisors. However there is no director evidence that these reviews conducted link directly to any professional development needs or in anyway improve the skills of teachers.
85.	Pohnpei State Code of Law Education Act 1999 Title II Part 4 §2-7 (2)	The Division of Pre-School and Primary Education shall administer programs of education and public instruction at the pre-school and primary school levels; PROVIDED that: (a) The department may establish and maintain a kindergarten class as a part of any public primary school where there is a kindergarten enrolment of at least 15 students; and (b) Each public primary school shall have at least one teacher assigned thereto and no school shall have less than three grades, first through third.		Compliance ECE centres are established at public primary schools where there is an enrolment of at least 15 students. Teacher data indicates that there is at least one teacher assigned to the class.

86.	Pohnpei Department of Education School Policy Policy 101.1	Acceptable Student / Teacher ratios, governing class size for instruction will be based on the following general guidelines: Elementary School: Class Size for Regular Program. Grade K Max 20/1 Min 10/1 Grad 1-3 Max 25/1 Min 15/1		Compliance ECE centres are established at public primary schools where there is an enrolment of at least 15 students. Teacher data indicates that there is at least one teacher assigned to the class.
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Summary of compliance determinations – Criteria 1 to 86 (86 in total)			
Category 1: Strategic Management			
Not determined	Compliance	Partial Compliance	Non Compliance
10	24	38	14

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 appears to be no evidence that shows the department has taken steps to ensure the State Baseline Curriculum aligns with the National Curriculum Minimum Standards.

The T3 Program commenced in Pohnpei in 1984 and has undertaken to train trainees in a variety of areas such as carpentry, small machine engines, house wiring, solar system maintenance, small appliances (washing machines, water dispensers, ovens) and automotive mechanics. The T3 program was under the National DOE however, as of April 1 it has transitioned to the State DOE. This transition is to take twelve months, and while this is occurring the T3 program is not teaching any students.

The focus of the position of Administrator of Work Development and Skills Training program is to develop skills for out of work youth and other young people in the area of vocational training. Those students within this program are placed on contracts and other non-paid training to undertake skills development.

Programs	Instructors	Participants
		Trainees being paid
Work Experience	Businesses	29
Traditional Life Skills	9 (2 contracts pending)	21
Trade and Industrial	1	2
Disabled Client	Businesses	2
GCA (Guam Construction Association)	Instructors' in Guam	12
T3	3 (contracts pending)	
		Non payment
Military	5	Seniors (anyone interested)
Job Core	3	
GED (General Education	5	Adult Education (Unlimited Age)

It is anticipated that all training and instructional programs will commence in June 2010. All programs have been with the WD & ST program for sometime. The only new program to enter the WD & ST program is the T3 program this is due to the National DOE transitioning the program to the States.

During interviews conducted with instructors from the T3 program a number of issues were identified with the programs which 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 literacy amongst some trainees.
- High drop out rate (approximately ½ students)

It is anticipated that all programs within WD & ST will commence in June 2010 until the end of the financial year. Funding for the projects next year is aligned to the financial year of 2010-2011. Allocated within the budget for 2010-2011 for the WD & ST program is \$263,486.00.

A range of vernacular language texts have been developed for Grades 1 to 3 in the areas of math and language arts, these books are waiting to be printed and distributed to schools, along with textbooks in English. The standard of these texts appear to be high and suitable for the needs of students in those classes. New textbooks 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 some of the students in Pohnpei. Advice was provided to the auditor that research was conducted 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.

Teachers interviewed at schools during focus group workshops indicated they have little influence over the text books supplied by DOE Central office. Teachers in general appeared to be satisfied with the textbooks supplied and utilized, however some teachers did indicate that they did not like the books as they felt they were not appropriate. When asked how the books were not appropriate, they stated that the books were too advanced for their students and they were NEW. This school year is the first time these particular textbooks have been introduced into the schools and limited instruction on the use of the new textbooks was provided by the vendor. Those teachers that did participate in workshops on the new textbooks did not share with their fellow teachers the use of these books.

Below - Audit Table 15 – incorporating Performance Indicators 87 to 95

	Source	Criteria	Means of Verification	Compliance Status
87.	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	Partial Compliance National Curriculum Minimum Standards were developed by a working group, including representatives from Pohnpei 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.
88.	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.
89.	Pohnpei State Code of Law Education Act 1999 Title II Part 2 §2-5 (7)	Adopting Pohnpei-wide curriculum standards and guides.	Copies of Pohnpei State curriculum standards.	Compliance The development of the Pohnpei DOE Curriculum Frameworks document in August 2009 with the support of PRIDE
90.	No documented policy. Though is regarded as essential criteria and a base level standard of educational services.	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. Focus group meetings with teachers reveals that all teachers use and acknowledge the usefulness of the developed curriculum, most teachers

				indicated that the benchmarks were too broad and most found it difficult to implement into lesson plans.
91.	No documented policy. Though is regarded as essential criteria and a base level standard of educational services.	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 any data being collected or a needs assessment being conducted or reports being provided on a regular basis to the Director in relation to the curriculum status.
92.	No documented policy. Though is regarded as essential criteria and a base level standard of educational services.	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, in consultation with secondary and elementary school teachers. There was some support and coordination from the State Curriculum coordinator.
93.	No documented policy. Though is regarded as essential criteria and a base level standard of educational services.	Minimum requirements of a core curriculum are: 1. Language –oral and written. 2. Social Studies. 3. Science. 4. Math 5. Vocational Skills.	Core curriculum documents for all subjects	Compliance School core curriculum benchmarks for English Language Arts, Social Studies, Science and Maths have been developed. Curriculum for vernacular language has also been developed.
94.	No documented policy. Though is regarded as essential criteria and a base level standard of educational services.	The State Director of Education reviews, on an established schedule, all instruction and curriculum programs offered throughout the State.	Schedule of review	* This criterion cannot be assessed as the Pohnpei DOE Curriculum Framework was implemented in August of 2009. This has not allowed for enough time to schedule a review of the current program.
95.	No documented policy. Though is regarded as essential criteria and a base	The State Director will designate staff persons to review and monitor all instruction and curriculum	Schedule of review Personnel assigned	Partial Compliance The Director has in place a designated staff of Curriculum Specialists to

	level standard of educational services.	programs.		undertake a review of the curriculum programs however, there is limited evidence that monitoring instruction is taking place of the curriculum programs. Greater emphasis needs to be placed on the monitoring and review of the curriculum programs to ensure quality and appropriateness of the curriculum programs.
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* *The Curriculum Framework was developed and was a department wide effort, its implementation was done in the new school year of 2009-2010. At this time a review is unable to be undertaken as the new curriculum has not been implemented for a full year.*

Staff Development

Staff development is virtually non-existent within the department. While it has been acknowledged by the Staff Development Officer that a teacher evaluation system needs to be developed that assesses the competency of teachers in eight areas they being:

- Content and language
- Pedagogy
- Bilingual education
- Resourcefulness
- Diversity
- Assessment
- Professionalism

There is no evidence strategies have been put in place to develop an evaluation system. Currently, no TNA has been conducted to identify teacher training needs, or implement any training programs for teachers. Further, there has not been a prepared training schedule or program for any in-service training, other than what is offered for teachers on-line, or through the College of Micronesia to meet the minimum required qualification.

The audit learned there has been established a teacher forum, which is held for one week per year during the summer as an in-service conference around the island in different locations in Pohnpei.

While advice was provided that a number of teachers have already or are currently undertaking AA / AS courses, this and the summer teacher forum 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 'sharing problems with colleagues'.

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 Pohnpei.

It is recommended that the Pohnpei 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 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)**.

All staff within Pohnpei State DOE would benefit from a TNA and in-service training being developed to ensure the best utilization of staff and greater efficiency and effectiveness of staff skills.

Below - Audit Table 16 – incorporating Performance Indicators 96 to 99

	Source	Criteria	Means of Verification	Compliance Status
96.	Pohnpei State Code of Law Education Act 1999 Title IV Part I §4-4	In addition to such leave as may be authorized for state employees generally under the Public Service System, the Department may grant a sabbatical leave of absence to any teacher. In granting a sabbatical leave, the Department shall consider, among other things, the following: 1. The nature and length of professional study, research or other activity proposed by the applicant; 2. The applicant's seniority, provided that seniority shall not be the dominant factor in granting sabbatical leave; and 3. The relationship of the proposed activity to the Department's needs and priorities.	Number of teachers granted sabbatical leave. Examples of course outlines of studies undertaken. Relevance of study undertaken by those granted sabbatical leave. Appropriateness of activity and Department needs and priorities ensured.	Non-Compliance During the course of this audit only one school principal indicated that she allowed one teacher time off on sabbatical leave to undertake further studies. The relevance of study was approved by the teacher to ensure it was in the area of the teacher's field. There is no evidence of any other school or staff member being given sabbatical leave to undertake further studies. Staff members were undertaking study in their own time through on-line commitment or through COM.
97.	Pohnpei State Public Service System Regulations Part 10 §10.1	Job-Skill Training - is training intended to improve the employee's performance on his present job or other closely related one.	Staff members (not exclusive to teachers) that are allowed to improve work skills through training opportunities.	Non-Compliance There is no evidence that staff members (Administration) are provided any work skills improvement through training opportunities, either through in-service training or through a recognised institution such as COM.
98.	Pohnpei State Public Service System Regulations Part 10 §10.3	Employee Development - is training intended to improve the employee's abilities and potentials, but is not directly related to his present or impending job.	Staff members (not exclusive to teachers) given opportunity to attend training to improve abilities. Outline of available training opportunities for staff members.	Non-Compliance No evidence of training opportunity to staff members to attend training to improve abilities or skills No outlines of available training for staff members

<p>99.</p>	<p>Pohnpei State Public Service System Regulations Part 10 §10.5</p>	<p>Evaluation of Training - The Office of Human Resources shall develop and maintain a system which will provide information and analysis of the effectiveness of training provided. All personnel who attend training courses outside of Pohnpei State are required to submit a written report, includes a summary of the course, along with a judgment of the added value gained from the course.</p>	<p>Examples of reports submitted with judgments on training undertaken. Examples of analysis of effectiveness of training provided to participants.</p>	<p>Non-Compliance No reports were submitted outlining judgments of training undertaken, relevance or benefits to DOE. Further, there was no evidence of any analysis conducted on the effectiveness of training provided to participants and the ability to implement this training to other staff member of DOE.</p>
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Testing Program

A variety of testing programs are undertaken by the Testing specialist and individual teachers. During the course of discussions in focus group few teachers acknowledged that they establishment testing for subjects on a weekly basis.

It must be noted that the testing specialist was seconded and this delayed the results for the 2009 testing and reports to teachers (*Refer to recommendation 2*). During discussions, teachers were concerned they had not received the results of the tests in the 2009 report, indicating that teachers do in reality look to receiving the reports and acting on them. The fact no report was received for 2009 was disappointing to teachers and was subsequently expressed during discussions.

Additional sources 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, and the PHET for year 8 students. However, both of these testing regimes are diagnostic tools. In 2009 out of the 862 student's testes only 656 were successful (76%) this is a decrease from 2008 when 783 students took the test and only 613 passed (78%).

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)**.

Teachers requested that presentations by each of the testing units (Pohnpei State and COM) be done to allow for greater understanding of what the test results actually mean with break downs to student levels. There needs to be connectivity between analysis, results and the best way to fix the problems. This would allow for teachers to focus their teaching to where it is most needed and allow for teachers to also assess how they are performing as teachers.

Even with the testing programs it is acknowledged by teachers that students are still not prepared to move from elementary to secondary and from secondary to college. There needs to be greater cooperation between the three levels of learning institutions to ensure students are academically ready for the next challenge. Bridging the gap was a program that would assist in preparing students transitioning from secondary school to college, teachers stated it was a successful program. However, this program is not in place and consideration needs to be given to reintroducing back into the schools, elementary and secondary.

Below - Audit Table 17 – incorporating Performance Indicators 100 and 101

	Source	Criteria	Means of Verification	Compliance Status
100.	Pohnpei State Code of Law Education Act 1999 Title III Part I § 3-8	Standard achievement tests and accreditation. The Department shall administer standard achievement tests on a periodic basis, at appropriate grade levels, as a measurement of the performance of the public and private schools of the state. Designee: Instruction and Curriculum, Testing Specialist	Pohnpei State Code of Law Education Act 1999 Title III Part I § 3-8	Partial Compliance There are no organizational policies and procedures relating to the testing program, however the only testing that is done on any regular annual bases is the NST, PHST and the COMET. These tests are administered by the Testing Specialist within the Testing Unit. There is no evidence that teachers administer weekly subject tests to evaluate appropriateness of learning materials or to gauge student learning.
101.	No documented Policy	The Testing Specialist will: 1. Review for: a. Cultural appropriateness. b. Student's needs. c. Applicability to Pohnpeian society. d. Reliability and validity. 2. Recommend changes in test use or type of test. 3. Take action.	No documented Policy	Partial compliance The testing specialist is actively involved in administering the NST, the PHST and the COMET. Guidelines for testing include development of test materials, preparation for Test Administration and Testing Administration. New tests have been developed which are trying to be have cultural appropriateness and applicability to Pohnpeian society. Review is built into the testing guidelines but no report highlights actual review methodology not outcomes of review. No results were available for the tests administered 2009.

State Scholarship and Loan Fund

The activities of the Board for the State Scholarship and Loan Fund are outlined in the PSCL. Procedural requirements for the application, assessment and selection of recipients are followed in accordance with the Postsecondary Scholarship Funds Regulations. It is to be noted that the staff member for the Scholarship Unit does a commendable job with the scholarships and ensuring that all awardees are undertaking their selected course of study and that the all requirements are meet by the Scholarship Committee.

Reports are furnished at the end of every school year to the Legislature, in accordance with legislative provisions.

Below - Audit Table 18 – incorporating Performance Indicators 102 to 105

	Source	Criteria	Means of Verification	Compliance Status
102.	Regulations for the Administration of the Pohnpei State Postsecondary Scholarship Funds Part 1 § 1.3	Applicability. Except as otherwise specified by law, these regulations shall apply to the administrations and expenditure of all fund appropriated for the Pohnpei Scholarship Funds. 1. Funding for the Pohnpei Scholarship fund shall be determined annually in the Pohnpei Comprehensive Budget Act.	Funds made available for the Pohnpei Scholarship Funds through the legislative requirements of the Comprehensive Budget Act.	Compliance Scholarship grants are allocated through two separate sources as determined annually in the Comprehensive Budget Act and in accordance with the provisions outlined in regulations and guidelines.
103.	Pohnpei State Code of Law Chapter 10 § 10-125	Duties and functions of Board. The duties and functions of the Board shall be as follows: 1. The Board shall have the authority, consistent with this subchapter, to award scholarships out of all available funds; 2. The Board shall specify the procedures by which applications for scholarships are to be taken and the process by which final decisions on the award of scholarships are to made; 3. The Board shall establish	Evidence of scholarships being awarded out of available funds. Establishment of Selection Criteria	Compliance Scholarships awarded are awarded within the authority of the Board and within available funds to the Board. 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. Reports are furnished by the Board in accordance with legislative requirements.

		<p>eligibility requirements and curricular criteria on which the award of scholarships shall be based, that shall be designed to advance the purposes of the Pohnpei Development Plan by restricting scholarship awards to students pursuing courses of study in subject areas deemed to be high priority by the state government. Subject to 18 PC 10-131 The Board shall be in consultation with appropriate officials from state government agencies or departments for identifying the high priority subject areas of study for Pohnpei. The requirements and criteria established pursuant to this subsection shall also be designed to ensure that only students of high academic achievement or demonstrated capacity to perform well in their chosen fields of study shall be awarded scholarships provided under this chapter;</p> <ol style="list-style-type: none"> 4. The Board may establish any other terms and conditions for the receipt and use of and loss of scholarships; 5. The Board, through the Director, shall prepare and submit to the Legislature at the end of every school year an annual report on the status of the scholarship funds administered by the Board and the director pursuant to the subchapter, and an accounting of 		<p>Scholarships are awarded in areas of economical need for the Federated States of Micronesia. A wide range and diversity of scholarships have been awarded over the years.</p>
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		<p>scholarships awarded, including, but not limited to, the respective fields of study for which the scholarship awards were used for that year; and</p> <p>6. The Board shall give due consideration to supporting the growth and development of post-secondary educational institutions within the Federated States of Micronesia in making its decisions on the award of scholarships grants.</p>		
104.	<p>Regulations for the Administration of the Pohnpei State Postsecondary Scholarship Funds Part 4 § 4.1</p>	<p>Maximum Scholarship Award. The maximum scholarship award shall be determined annually by the Scholarship Committee and be approved of by the Director. Scholarships awardees will receive a scholarship financial package.</p>	<p>Financial packages developed for awardees and maximum scholarships awarded.</p>	<p>Compliance Scholarships are allocated by the Scholarship Committee and approved by the Director. Financial packages are prepared by the Scholarship Unit Staff member and provided to the awardees.</p>
105.	<p>Pohnpei State Code of Law Chapter 10 § 10-128</p>	<p>Recipient general requirements. Each recipient of a scholarship provided under this subchapter shall, at the time of the award:</p> <ol style="list-style-type: none"> 1. Be a legal resident and citizen of Pohnpei who has been accepted to attend and able to prove such acceptance, or be attending a post-secondary institution as provided under this subchapter; 2. Anticipate and thereafter enrol in, or be enrolled in an academic program leading to a bachelor's or graduate degree as provided under this subchapter at a United States of America-accredited post-secondary educational institution in the Federated states of Micronesia, the United States 	<p>Criteria set in accordance with the legislative requirements.</p> <p>Evidence of students being enrolled in stated accredited educational institutions.</p> <p>Documented of required grade point average.</p> <p>Documented requirement placing obligation on recipient of the scholarship to work within the FSM for the required number of years (Contract).</p>	<p>Compliance Evidence was obtained that all recipients of scholarships are citizens of the FSM. Prior to any funding being provided to awardees evidence of enrolment from accredited educational institutions is obtained. That is the institutions contact the scholarship staff with the enrolment details.</p> <p>Awardees must provide evidence of grade point average as part of the scholarship application.</p> <p>Evidence was obtained that a guarantee is sought from the awardees (usually a contract) that they will return to the FSM and undertake a required number of years in the FSM in the field</p>

	<p>of America or its territories and possessions, the Republic of the Marshall Islands or the Republic of Palau; and</p> <p>3. Have maintained a satisfactory grade point average as provided by 18 PC 10-131;</p> <p>4. Each student receiving a scholarship provided under this subchapter shall be obligated to work within Pohnpei State for a period not less than the number of years he received such scholarships; PROVIDED that such employment is available.</p>		of study undertaken.
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Summary of compliance determinations – Criteria 87 to 105 (19 in total)			
Category 2: Pedagogy			
Not determined	Compliance	Partial Compliance	Non Compliance
1	7	6	5

SECTION THREE: CATEGORY 3 – ADMINISTRATION COMPLIANCE

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 Indicator 106

	Source	Criteria	Means of Verification	Compliance Status
106.	Pohnpei State Code of Law Division II Title 18 Subchapter II § 10-125	<ol style="list-style-type: none"> 1. The Board shall have the authority, consistent with the subchapter to award scholarships out of all available funds. 2. The Board shall specify the procedures by which applications for scholarships are to be taken and the process by which final decisions on the award of scholarships are to be made. 	<p>Scholarships awarded out of funds available.</p> <p>Documented procedures outlining the process for the awarding of scholarships to applicants.</p>	<p>Compliance</p> <p>Scholarships are being awarded by the Scholarship Board. Funds are made available for scholarships.</p> <p>Guidelines outlining the necessary requirements and producers applicants must follow for scholarships for final decisions on who will be awarded scholarships.</p>

Private Schools

Interaction between the Private Schools and the Pohnpei State Department of Education is minimal. Regular annual reports are received from the schools with limited information (a one page document), which generally states the number of students enrolled for that year. It does not provide any information on class size, student / teacher ratio, expenditure of moneys provided by Pohnpei DOE, student absenteeism, teacher absenteeism, student drop-out rates, student scores, maintenance and constructions in schools, equipment and resources, teacher qualifications, parent involvement in school activities, PTA meetings and minutes from meetings.

This information would assist the Director to made informed decision when providing reports to National DOE whether the school is operating consistent with the terms of their charter and applicable regulations.

It is recommended that the State Department of Education provide a template of a report to be provided to the Private Schools outlining the necessary information. (**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 107 to 110

	Source	Criteria	Means of Verification	Compliance Status
107.	FSMC, Title 40. Education Chapter 1 § 109. Private Schools.	<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.</p> <p>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.</p> <p>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>	<p>Copies of Annual license applications from private schools signed by Director and State Board of Education.</p> <p>Submission to Secretary of National DOE with written application of charter.</p> <p>Evidence of issuance of annual licence on confirmation from State Director of Education school is operating within terms of approved charter.</p>	<p>Partial Compliance</p> <p>Evidence was obtained of submission of applications from private schools for renewal of permit being reviewed by Director. The Board of Education has not reviewed any application for renewal of permit since 2008 due to the Board not being active.</p> <p>Further, these applications were forwarded to the Secretary of Education NDOE for approval and issuance of annual licence.</p> <p>There is no documented evidence that the Director of PDOE has made any visits to non-public schools to ensure they are operating consistent with the terms of its charter and other required regulations.</p>
108.	Pohnpei State Code of Law Education Act 1999 Title V § 5-1	Every private school shall be subject to regulation by the Department. The Board of Education shall prescribe uniform, minimum standards for the certification of the principals,	<p>Documented evidence of standards for certification in accordance with state curriculum standards.</p> <p>Documented evidence of standards for principals and teachers in</p>	<p>Partial Compliance</p> <p>All schools within the State of Pohnpei were provided with the Curriculum Framework developed by the Department of Education ensuring there was consistency with curriculum</p>

		teachers and curriculum of private primary and secondary schools operating within the state, which standards shall be in substantial conformance with the standards applicable to the principals, teachers and curriculums of the public schools of this state. Private school premises shall also be held to comply with state standards with regard to sanitation and public safety.	accordance with state standards. Documented evidence (reports) private schools meet required standards regarding sanitation and public safety.	standards. Evidence of teachers and Principals having the necessary qualifications was found in one of the private schools documentation; however other schools reports did not provide the necessary information. Private schools are regarded to have equal if not better standards than the states schools with regard to sanitation and public safety areas.
109.	Pohnpei State Code of Law Education Act 1999 Title V § 5-2	No person or group of persons may operate a private school within the jurisdiction of the state of Pohnpei without first obtaining a permit.	Copies of permits for private schools operating within the Pohnpei jurisdiction	Compliance Documented evidence and discussions with the Director of Education indicated that all private schools within Pohnpei State have obtained the required permit.
110.	Pohnpei State Code of Law Education Act Title V § 5-4	Private schools shall submit an annual report to the Department in a form established by the Department. Failure to comply with this requirement shall constitute an offense punishable by a fine of not more than \$100 for each offence.	Examples of three (3) annual reports from different private schools. If reports not submitted in appropriate timeframe than evidence of fine being administered and enforced.	Non-Compliance No regular or formalized oversight is provided by DOE of the Private School in Pohnpei State. Reports are furnished by the private schools, however the information provided in these reports is limited to the number of students enrolled. It does not provided information on maintenance, construction, absenteeism by students, teachers, teacher, principal qualifications, expenditure of Department allocated budget, parent involvement in school activities or any other necessary information that may be required by the Director to ensure the school is operating as a Public School would be.

Hiring of Special Instructors

The process for hiring special instructors is restricted to the Division of Workforce Development and Skills Training within the Department of Education. Currently WD & ST is working under policies and procedures for the hiring of special instructors that are under review. The existing policies and procedures are from the old program of Job Training Partnership Aid.

In the case of hiring special instructors for the Traditional Life Skills Program, the Administrator will identify an instructor who has made an expression of interest in the program. The instructor is then directed to the Department of Personnel where the process is followed under the hiring of a contract employee. It must be noted that at this time there is no Position Descriptions in place for the Traditional Life Skills Program.

Currently there are nine (9) contracted instructors contracted with WD & ST under the Traditional Life Skills Program, with a further two (2) contracts pending. The contracting of instructors is dependent on an instructor coming into the office of WD & ST and declaring their interest in becoming an instructor in the program. 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.

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 Indicators 111 to 114

	Source	Criteria	Means of Verification	Compliance Status
111.	Policy and Procedures are currently under review and are old programs.	The Administrator recommends a person for special instructor for the traditional life skills program programs in the following manner: 1. Describe the program and needed skills. 2. Describe the applicant's skills and background. 3. Provides content of the program to be taught 4. Describe the manner of instruction. 5. Length of the course/program. 6. Estimate cost of program.	Process for selection of persons for special cultural heritage and traditional skills program.	Partial Compliance Currently Policies and Procedures for the hiring of Special Instructors as in the case of Traditional Life Skill Instructors. For the Traditional Life Skill Program are old policies from another program. Currently there are 9 instructors with contracted with another 2 contracts pending. 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 criterion have been fulfilled.

112.	Pohnpei Public Service System Regulations Part 3 Section 3.12	When Administrator of WD & ST has sufficiency to recommend the person to the Department of Personnel. The requirement of the PSS 'Hiring of Contract Employee' is enforced.	Position Descriptions are attached to request for personnel actions, signatures from all necessary persons is obtained. Office of Human Resources prepares Personnel Action.	Partial Compliance Currently there is no position descriptions developed for the Traditional Life Skills instructor jobs. However, all other PSS regulatory requirements are followed
113.	Policy and Procedures are currently under review and are old programs.	These shall be submitted to the State Director of Education and Administrator for final approval.	Approved personnel action forms are returned to Director and Administrator of WD & ST for approval.	Partial Compliance Without full position descriptions comparison to instructor's application can not be fully made and therefore it is only on the documents provided that decisions are made.
114.	Pohnpei State Law 6L-83-06 The Pohnpei Language Commission § 2 (2) (c)	Experts, consultants, and professionals may be employed or contracted as the Commission deems appropriate and as the budget and annual appropriations may allow.	Process for selection of persons deemed necessary. Documentation of any persons engaged to undertake work in program.	Non Compliance The Language Commission has not been established at this time. The Governor has not appointed any person or established a budget.

Fiscal Planning and Accounting Systems

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

There was no evidence uncovered by the auditor during the course of the Management Audit conducted on the Department of Education of wilful malpractice or mismanagement of funds. The DOE Budgetary Officer ensures the Department is in compliance with the procedures set down by the State Department of Finance and the State Department of Budget. Currently there is one person is responsible with the procurement of resources and equipment for the Department. With the absence of documented policy and procedures knowledge of the processes and systems there is a significant risk of loss of corporate knowledge of these procedures if and when the relevant officer retires or moves to another field of duties. Currently all the knowledge and understanding of the processes is really with the relevant staff member. If other staff members are called up in the event the procurement officer goes on extended leave that person called to fill the position may experience a steep learning curve or adopt and institute their own processes which maybe contrary to those in place.

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. The Budget Officer has the responsibility of informing the Director on the financial status of the Department, in the event of unforeseen circumstances occurring, to allow for informed decisions to be made. Currently budget advice and briefings are done on the request of the Director on a as needs bases. The Director as a matter of course should be obtaining regular budgetary advice briefings on the status of the budget and expenditure. Without such structured formal and detailed reporting, it would be difficult to accept the Director is fully informed at all times of the status 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 115 to 121

	Source	Criteria	Means of Verification	Compliance Status
115.	Pohnpei State Code of Law Title 11 Chapter 10 § 10-103	There is hereby authorized for appropriation from the general fund of Pohnpei and such funds in the Pohnpei Treasury into which Compact § 221 (b) monies are deposited a sum or sums to be determined annually	Evidence of monies appropriated from the general fund and compact funds are determined annually on budgetary requirements.	Partial Compliance Money is made available for the DOE to implement its education program within the schools within Pohnpei State. Funds are determined annually and deposited on that determination, in accordance with budgetary obligation. The budget is not always approved as submitted. Legislative changes are made that alter the intent of the budget.
116.	Financial Management Regulations Part 6	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.	Development of a tentative budget for the next fiscal year. Board of Education to Review prior to submission to the Governor. Last draft budget reports produced	Compliance While no documented policy exists, the State Department of Finance specified the budgetary submission process. Draft budgets are prepared in strict compliance with the State Department of Finance requirements
117.	Financial Management Regulations Part 6	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 Board of	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

		Education. Designee: Budget and Supply		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.
118.	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 reviews	Partial Compliance The budgetary officer appears to be the only person to produce expenditure sheets for review. This can allow for discrepancies to occur between the various stakeholders of records retained. There would be greater benefit from implementing an oversight that involved all stakeholders on budgetary and expense issues. Before final review is conducted by the Director. Externally, the Department of Finance exercises a further review.
119.	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	Partial Compliance Budgetary and expense records are maintained by the DOE. However, records are maintained and retained by other DOE stakeholders relating to their specific tasks. For example, the Property and Procurement Officer maintains expenditure information necessary for purchasing. However, there appears to be no linkages between the various record holders and the budgetary officer. This allows for variations to 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.
120.	No documented policy	The State Educational Budget Office will at a minimum perform the following: <ol style="list-style-type: none"> 1. Record every financial transaction. 2. Record all monies received as to: <ol style="list-style-type: none"> a. Type b. Source 3. Record all monies expended as to: <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> 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 criterion. While there is some ad hoc reporting to the Director, it is acknowledged there is no established reporting system in place informing Director on budget relevant issues. For this reason only, this criterion is assess as partial compliance
121.	No documented policy	The State Director of Education shall designate department heads and other such personnel as necessary as having budgetary responsibility.	Roles of persons responsible	Compliance The Director has appointed relevant personnel with 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 SIP submissions.

Recruitment

Recruitment for the Department of Education rests with the Division of Personnel. It was noted during the audit that there is limited communication and consultation between the Director of Education and the Department of Personnel during the recruitment of any personnel. The Department of Personnel will provide an eligible list of five (5) candidates, in precise numerical order. This list is then provided to Director of DOE. From the list Director then must interview and select which he fills is the best candidate from the list provided.

The Division of Personnel maintains all detailed personnel records. The auditor requested position descriptions from the administration officer of DOE and was informed that all position descriptions for employees of the DOE are maintained by the Division of Personnel. The outcome of discussions with the Division was a review of ALL position descriptions relating to DOE which are held by the Division.

Current position descriptions capacity to inform a newly recruited employee to the DOE is debatable. Standardized (however broad) PDs are maintained. These PDs currently being used by the Divisions are exceedingly 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**).

Those position descriptions observed where limited in their scope of information. Given the diversity and range of jobs performed within the DOE it was observed in some instances PDs do not exist at all for some positions currently being undertaken. The following position descriptions were located and provided to the auditor:

- Education Specialist I-II-III
- Principal I-II-III-IV
- School Counsellor II-III-IV
- School Teacher I-II-III-IV-V-VI-
- Principal High School
- Administration I-II-III
- Clerk Typist-II-III

It must be noted that 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

The organizational structure of the DOE indicated a vast array of different functions performed by many DOE employees. An example would be of the specialist areas within the department, the audit inspection was only able to obtain a 'Class specification' for Educational Specialist – Curriculum development or training activities. Given the diversity of programs being implemented within the DOE, testing, program coordinators in Special Education, budget officers, Traditional Life Skills Program, Testing Specialists, Early Childhood Education, T3 Instructures, – 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.

The difference between the levels of education specialist is the educational qualification, there was no distinction between elementary and secondary school teachers.

While the employment Class specifications outline four separate classes of 'counsellor' within secondary schools, there were no PDs provided for the vast array of other positions found within schools, for example Librarian, Special Education teachers, Vocational Coordinator, school nurse and bus driver.

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 122 to 125

	Source	Criteria	Means of Verification	Compliance Status
122.	Pohnpei State Code of Law Education Act Title 2 Part 2 § 2-5 (5)	Duties and functions of the Board. Assisting the Director in recruiting and hiring key personnel.	Procedures followed in last three (3) recruitments.	Non Compliance The Board has provided no assistance to the director in the process of recruiting and hiring key personnel. This is due to the Board not sitting since August 2008. There is a new Board of Education sworn in May 2010 and it will be their responsibility to ensure hiring policy is followed in accordance with legislation.
123.	Pohnpei State Code of Law Education Act Title 2 Part 3 § 2-6 (6)	Hire, certify, and evaluate department personnel, in coordination with the Division of Personnel, Labor and Manpower Development.	Demonstrated cooperation in the development of procedures followed in hiring, certifying and evaluating department personnel.	Partial Compliance The only area where policy is followed in coordination with the Division of Personnel, Labor and Manpower is to certify. Persons applying for positions with the DOE are not evaluated in accordance with policy guidelines nor is there any input from the Board of Education.
124.	Public Service System Regulations Part 2 § 2-1	Based on the needs of the Government, the State Personnel Officer, shall administer recruitment programs designed to attract fully qualified applicants to the Public Service System. Examinations shall be practical and reasonable and shall provide for ascertaining the qualification of applicants and their relative	Documentation of last three (3) exams administered to applicants for positions with the Department of Education.	Non Compliance No evidence existed that examinations were administered to applicants for positions within the Department of Education. Further, there was no evidence that applicants had to show capacity and fitness for the proper performance of duties in the class of position they were applying

		capacity and fitness for the proper performance of duties in the class of position for which they are applying.		
125.	Public Service System Regulations Part 2 § 2-2	All positions shall be recruited by advertisement for an ample period of time and will include the following information: a. job title b. pay level c. duties d. education or skills needed e. where to apply f. last date to apply	Examples of last three (3) advertised announcements with required information.	Compliance Department of Personnel post advertisements doe positions for the required 30 day period with all the specified information and in accordance with the Public Service System Regulations.

Personnel Performance Evaluation

Performance evaluation of employees is undertaken at a school level. Individual Principals are responsible for conducting evaluations with assistance from curriculum specialists and other key staff members from the main office of DOE. The instrument currently being used is the (IOTA) the Observation of Teaching Activities this form does not appear to be suitable for accurately assessing teacher performance. Pre and post meetings are to be held when observations of teachers are to take place to allow for discussions of expectations on what is to be observed. Feedback on the teacher's performance during the observation is conducted and teachers are afforded the opportunity to counter any comment during this process. During the audit all principals interviewed were asked whether they provided a written report on the pre and post meetings and any concerns or outcomes arising from the meetings in the personnel files of the teachers. All principals without exception indicated they did not provide a written report, but solely relied on the IOTA form to provide all the necessary information.

There is no formalized internal DOE policy and procedures relating to evaluation of staff members (teachers or staff), in the absence of policy and procedures, there is no evaluation of staff members within the organization. Supervisors do not conduct performance appraisals on subordinates ensuring standards of job skills and work performances are being met. This has allowed a culture of inefficient and ineffective commitment to work duties. There needs to be a central guidance (through documented policy) to provide organizational oversight and consistency. The local level evaluation means a more accurate reflection of actual performance.

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

- Developing and Implementation of Classroom Objectives
- Variety in learning activities
- Use of materials for instruction
- Opportunity for participation
- Teacher reaction to students response
- Individualization of instruction
- Learning difficulties
- Current application of subject matter
- Assessing student achievement/comprehension
- Creative expression
- Development of student initiative
- Social climate
- Classroom control

Nowhere on the form does it allow for any disciplinary action taken against a teacher or if minor complaints are dealt with by the principal to be nominated. Further, a properly completed performance evaluation from may assist in determining the cause of an employee's conduct during a disciplinary investigation, such as, if neglect to attend to duties or a matter outstanding, a proper evaluation report may indicate deficiencies in skills and knowledge and thereby identify the cause of the suspect 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 126 to 133

	Source	Criteria	Means of Verification	Compliance Status
126.	Pohnpei Code of Law Division 1 Public Officers and Employees Title 9 Chapter 2 § 2-130	The Director shall develop and maintain a system of performance evaluation for the purpose of appraising the productivity of employees in the public service. Each agency shall develop performance evaluation criteria for every class or, if appropriate, for individual positions and shall rate each employee under its jurisdiction at least once a year.	Examples of personnel evaluation forms for every class or individual positions.	Partial Compliance Observation of undertaken of teachers by principals and specialists within the classroom environment. This is undertaken at least once a year or if time permitting twice a year. The IOTA form is used by all principals to ensure consistency in all schools and pre and post meetings are undertaken prior to the observations taking place. However there is no evidence of any performance evaluation being undertaken on other staff members within the DOE which allows for feedback of work performance and the ability to improve on job skills, abilities, and attitudes.
127.	Pohnpei State Code of Law Education Act 1999 Part 3 § 6	Hire, certify, and evaluate department personnel, in coordination with the Division of Personnel, Labor and Manpower Development	Personnel evaluation reports for 3 employees from each DOE division or unit.	Partial Compliance There was evidence during the audit that the DOE undertakes to have the Department of Personnel certify that appropriate candidates are made available to DOE for consideration in hiring. However there was no evidence that evaluation is done on any other employee of DOE other than teachers.
128.	Public Service System Regulations Part 8 § 8.2	The performance evaluation program is primarily designed to measure how well employees are discharging their duties and responsibilities, to recognize employees who are doing outstanding work, and to highlight areas needing improvement.	Personnel evaluation reports for 3 employees from each DOE division or unit.	Non-Compliance While there is a standardized performance evaluation form used for appraising teacher's ability in class room delivery, the form does not indicate areas of knowledge and skill development. There were no employee forms which neither gave stands within the organization nor highlighted areas requiring improvement.

129.	Public Service System Regulations Part 8 § 8.3	All employees and their supervisors shall periodically evaluate the employees' success in meeting critical employment elements and other established performance requirements. Every permanent and probationary employee shall periodically receive written performance evaluations including the determination of the employee's performance standard.	Personnel evaluation reports for 3 employees from each DOE division or unit.	Partial Compliance This performance criterion is obtaining partial compliance due to the teachers being observed using the IOTA form. This form gives a written (however limited) performance evaluation which determines the employees performance standard. However, there is no such form or any performance evaluation for other staff members of DOE available which evaluates employee's performance standards.
130.	Public Service System Regulations Part 8 § 8.4	Each supervisor shall personally meet with the employees under his/her supervision to periodically review the objectives of the job, the expected standards of performance and the means for achieving them. These reviews shall include the identification and/or review of the critical performance elements of the employee's position.	Personnel evaluation reports for 3 employees from each DOE division or unit.	Non-Compliance Other than the observations of teachers it was found during the audit at no time was any staff member met by their respective supervisor and a review or appraisal conducted of their job requirements. A schedule needs to be developed by supervisors of their subordinates to ensure this performance review takes place and that all staff is aware of their roles, responsibilities and positions within DOE.
131.	Public Service System Regulations Part 8 § 8.5	Every supervisor shall meet personally with the employees under his/her supervision to establish the critical performance elements of the employee's position. These critical performance elements shall be identified by applying guidelines set by the Office of Human Resources. Generally, the critical performance elements are those duties and responsibilities that are	Demonstrated establishment of critical performance elements of employee's position. Personnel evaluation reports for 3 employees from each DOE division or unit.	Non-Compliance Other than the observations of teachers it was found during the audit at no time was any staff member met by their respective supervisor and a review or appraisal conducted of their job requirements. A schedule needs to be developed by supervisors of subordinates to ensure this performance review takes place and that all staff is aware of their roles and positions within DOE. Due to the lack

		<p>so critical to the position as to necessitate the termination of an employee if he/she fails to perform them.</p>		<p>of performance appraisals being undertaken it makes it impossible for the Director to administer terminations or any other disciplinary action against staff member.</p>
<p>132.</p>	<p>Public Service System Regulations Part 8 § 8.6</p>	<p>The following performance standards shall apply to the performance evaluation program and the performance evaluation reports:</p> <p>'Outstanding' performance is awarded when performance significantly exceeds satisfactory performance standards and is truly exceptional.</p> <p>'Satisfactory' performance is awarded when the performance adequately meets the job's performance requirements.</p> <p>'Marginally Satisfactory' performance is awarded when the performance is barely acceptable and improvement is needed. An employee shall receive a marginally satisfactory performance standard if one or more of the critical performance elements is rated M.</p> <p>'Unsatisfactory' performance is awarded when the performance fails to meet even the marginally satisfactory standard. The work is unacceptable and improvement is unlikely.</p>	<p>Annual written performance ratings for the last three years for a selected three employees from each DOE division or unit showing use of performance standards.</p>	<p>Non-Compliance</p> <p>No documentation was evident that demonstrated that performance standards were applied. Or annual written performance ratings were applied to staff members. .</p>

<p>133.</p>	<p>Public Service System Regulations Part 8 § 8.7</p>	<p>Each supervisor shall prepare a performance evaluation report for each employee under his/her supervision. The reports shall be based on the periodic reviews and the evaluation of the employee's performance standards. The report shall be in the form prescribed by the Office of Human Resources.</p>	<p>Annual written performance ratings for the last three years for a selected three employees from each DOE division or unit.</p>	<p>Non-Compliance No evidence of reports were provided showing that Supervisors had conducted performance evaluations and prepared a report in the format prescribed by the Office of Human Resources were produced that indicated any ranking of staff members</p>
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Penalty Sanctions

The action the Director may take in dealing with disciplinary breaches is governed by the Provisions of the Pohnpei State Code of Law Public Officers and Employees, the Public Service Systems Regulations and the Education Departments Policies and Procedures.

The Director has expressed a desire to place teachers and staff members of the Department of Education on contracts (similar to that of the Department of Education in Kosrae). The Director believes that placing persons on contract allows greater flexibility and oversight with regards to teacher performance.

It must be noted the Director of Education is implementing at the time of this audit the Professional Standards for the Department of Education. This project will involve the establishment of a dedicated officer to investigate breaches of discipline and to over-see the maintenance of professional standards. It is anticipated with the implementation of the professional standards the disciplinary process will be streamlined and simplified. Currently and while this project is being implemented the disciplinary matters for the Department are taken under the Public Service Systems Regulations. This allows for greater scope for employees to their have their actions overturned due to failure of the Department to not strictly adhere to due process in accordance with the provisions of the Regulations.

The minimal disciplinary action taken in recent years maybe attributed to the complex disciplinary systems established in regulations. The Director indicated the current Professional Standards Project will streamline the disciplinary process and hopefully improve disciplinary actions taken.

All members of the Department of Education will be provided with information on the Professional Standards Manual, this will eliminate the ability of those members to use the excuse of they didn't know, as ALL members of DOE will know.

It is predicted that there will be no disputed appeals subsequent to the introduction of the new Professional Standards Procedures.

Below - Audit Table 25 – incorporating Performance Indicators 134 to 137

	Source	Criteria	Means of Verification	Compliance Status
134.	Pohnpei State Code of Law Division 1, Title 9 Public Officers and Employees Chapter 2 § 2-138	Disciplinary action: suspension. A management official may, for disciplinary purposes, suspend any employee without pay for such length of time as he considers appropriate. No single suspension for a period of more than three working days, whether consecutive or not, shall take effect until the management official transmits to the employee, by the most practical means, a written notice setting forth the specific reasons for the suspension and the employee's rights of appeal. A copy of the notice shall be filed with the Director without delay. With the approval of the Director, an employee may be suspended for a period longer than 30 days pending the investigation of any charge against him. When an employee has been suspended pending such an investigation and the charge is subsequently dropped, he shall be reinstated in his position with full pay and benefits retroactive to the date of suspension.	Last three reports of disciplinary action, showing disciplinary action where suspension was implemented and procedures as outline followed.	Compliance Documented evidence was obtained that written suspense was provided to two staff members for periods of 15 days. These letters were provided forth with to the relevant staff members and copies attached to their personnel files. These letters were written after an investigation was undertaken by the Director.
135.	Pohnpei State Code of Law Division 1, Title 9 Public Officers and Employees Chapter 2 § 2-139	Disciplinary action: dismissal; demotion. A management official may, for disciplinary reasons, dismiss or demote an employee for such causes that will promote the efficiency of the public service. Demotions may also be made for reasons other than disciplinary	Last three reports of disciplinary action, showing disciplinary action where dismissal was implemented and procedures as outline followed.	This criterion could not be assessed. There was no evidence that any staff member had been terminated from the employment of DOE in recent years. It is felt by the auditor that the Director would however follow all policies as outlined if this action was deemed necessary.

		ones. The personnel regulations shall specify the circumstances in which such demotions may be authorized. No dismissal or demotion of a permanent employee shall be effective for any purpose until the management official transmits to the employee, by the most practical means, a written notice setting forth the specific reasons for the dismissal or demotion and the employee's rights of appeal. A copy of the notice shall be filed with the Director without delay.		
136.	Pohnpei Department of Education School Policy Policy 120.4 (a)	Any teacher, staff member or other school personnel who violates this policy shall be subject to adverse action under the applicable Personnel Rules and Regulations. Personnel Polices and Alcoholism and Problem Drinking may also be applied.	Copies of last three adverse actions taken under the applicable Personnel Rules and Regulations.	This criterion could not be assessed. There was no evidence that any staff member had been terminated from the employment of DOE in recent years. It is felt by the auditor that the Director would however follow all policies as outlined if this action was deemed necessary.
137.	Pohnpei Department of Education School Policy Policy 120.4 (b)	Possession and use of illegal drugs and other controlled substances by a teacher, staff and other school personnel shall be referred to the Law Enforcement Agency.	Last three reports submitted to Law Enforcement Agency regarding DOE personnel and possession of illegal drugs or other controlled substances. (If knowledge and report made).	This criterion could not be assessed. There was no evidence that any staff member had been terminated from the employment of DOE in recent years. It is felt by the auditor that the Director would however follow all policies as outlined if this action was deemed necessary.

School Administration, Policy and Procedures

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

It is the implicit intent of Compact II that DOE move away from a ‘centralized management base’ to a ‘school based management regime’. This approach would be beneficial in developing a great autonomy at 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 Department Policies and Procedures Manual which is essentially local level policies. During the Audit inspections, not all schools were able to produce such documents the Manual is 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 localized school based policy manuals. *(In 2005 the Board of Education prepared draft policies however these policies appear not to have been promulgated. In considering this recommendation it will be necessary to review draft policies and to develop and support those policies with operational procedures).* **(Recommendation 25 refers)**

Below - Audit Table 26 – incorporating Performance Indicators 138 and 139

	Source	Criteria	Means of Verification	Compliance Status
138.	Pohnpei State Code of Law Education Act 1999 Part 3 § (7)	The Director shall be responsible for physical facilities planning, construction and maintenance.	DOE annual report on School Administration relating to construction and maintenance.	Partial Compliance There was evidence of construction work taking place at some schools with maintenance. However this was not consistent within the DOE. Most schools required some maintenance work to either classrooms or other necessary facilities (e.g. bathrooms, water supply).
139.	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	DOE annual report on School Administration	Partial Compliance No documented DOE policy relates to this criterion. Most school buildings and facilities are maintained to the best possible level by Principals. While staffs are supervised by Principals

		<p>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.</p>		<p>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.</p>
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Employee Regulations for assignment, transfer, leave and paid positions

Focus group workshops and individual interviews indicated general acceptance of compliance with Pohnpei State Public Service System Regulation provisions relating to assignments, transfers, leave and paid positions. Documented evidence was found that the Department adheres to the regulations.

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

It is recommended that issues identified in this criteria need to be supported with documented policy and procedures. (**Recommendation 26 refers**). (Also refer to comments made on P122 of this report).

Below - Audit Table 27 – incorporating Performance Indicators 140 to 143

	Source	Criteria	Means of Verification	Compliance Status
140.	Pohnpei State Code of Law Education Act 1999 Part 4 § 2-7	(b) Each public primary school shall have at least one teacher assigned thereto and no school shall have less than three grades, first through third.	Pohnpei State Code of Law Education Act 1999 Part 4 § 2-7	Compliance It was noted during the audit that all schools meet the legislative requirements relating to schools having no less than three grades, and one teacher assigned.
141.	Pohnpei State Code of Law Education Act 1999 Title IV Part 1 § 4-4	Sabbatical Leave. In addition to such leave as maybe authorized generally under the Public Service System, the Department may grant a sabbatical leave of absence to any teacher.	Pohnpei State Code of Law Education Act 1999 Title IV Part 1 § 4-4	Partial Compliance During the course of the audit it was found that sabbatical leave was granted by one principal for teachers to further their studies.
142.	Pohnpei State Public Service System Regulations	The provisions of the PSS are complied with relating to leave, assignment, transfer and paid positions	Data and records on leave, assignments, transfers and paid positions	Partial Compliance Data was produced showing current assignments of personnel. Other documented evidence was obtained that show the provision of the Public Service System in relation to transfers, leave and paid positions is being

				complied with. However, some requests for increases from one pay level to another are not done in a timely manner.
143.	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, it was found that transfers were undertaken in the best interest of all parties that is the teachers and distance travelled and the needs of the school. However, no documented evidence to support was produced.

Supplies, Equipment and Vehicles

The Pohnpei Department of Education has established an extensive fixed asset listing in relation to equipment, structures, and vehicles with associated costing. This listing while extensive is not easily to follow as it grouped school by school. Central office maintained a detailed list of all property and equipment purchases and retention. Yearly inspections are conducted of school property and equipment by the Property and Procurement officer.

During interviews with School Principals as part of the audit, Principals acknowledged they do not retain their own copies of property and equipment lists nor do they conduct their own inspections prior to any central office inspections. It is recommended that all schools develop their own property and equipment lists and conduct their own inspections prior to central office inspections. **(Recommendation 27 refers)**. However, all DOE property observed during the audit was Government tagged.

Workshop focus groups with teachers indicated that textbooks that had been provided to schools were not in sufficient for the number of students in the class, teacher reference books were missing for some subjects and subject resources were also missing. The textbooks being used for this school year 2009-2010 are new. However the distribution was done on the enrolment figures provided from the last school year of 2008-2009. The discrepancies may have occurred from the difference in enrolment figures between the two years.

There is a Textbook Accountability Committee (TAC) comprising of Division Chiefs, Program Managers, Education Specialist, Fiscal Officer, Procurement Officer and School Representatives. This committee has been developed to act as the coordinating and monitoring mechanism for the Department ensuring textbook policies on procurement, distribution and accountability by the administration is to be maintained at the school level accordingly. Further insuring DOE follows part 6 of the Pohnpei State Financial Management Regulations. Responsibilities for the conditions of the books are with the student, teachers and principles, this is done through contracts and accountability distribution forms.

Below - Audit Table 28 – incorporating Performance Indicators 144 to 152

	Source	Criteria	Means of Verification	Compliance Status
144.	Pohnpei State Code of Law Education Act 1999 Title II Part 3 § 2-6	The executive functions of the Department of education shall be vested in the Director of Education who shall: (9) Review and evaluate textbooks and materials before purchase in order to determine their suitability as may be consistent with the established curricula	Suitable text books have been purchased which are consistent with established curricula.	Partial Compliance Textbooks purchased were reviewed and evaluated to ensure they were suitable and consistent with established curricula, however instructional tools provided in some of the textbooks are unable to be utilized to their full extent as there is no DOE equipment or resources to implement the tools.
145.	State Department of Education Procurement 5-year Plan	There shall be a formal assessment on existing textbooks in all schools that will determine the number and conditions of these textbooks by June of every year. Chief of Secondary Education, High School Principals, Department Chairpersons and Education Specialists with the District Supervisors must work together to complete textbook assessment for all high schools and present a written report to the Textbook Accountability Committee. Chief of Elementary, District Supervisors and Core subject Specialists must work with Elementary School Principals and their respective teachers in completing the assessment of the textbooks and present a written report to the Textbook Accountability Committee. Based on the assessment, Textbook	Three written assessments of existing textbooks utilized within schools determining number, condition of books. Three written reports with required information presented to the Textbook Accountability Committee demonstrating input from all relevant supervisors and specialists. Process for selecting appropriate vendor and ensuring textbooks arrive.	Partial Compliance There was no documented evidence provided during the audit determining the condition and number of textbooks each year, no written report was provided showing textbook assessment for high schools being presented to the Textbook Accountability Committee. Textbooks were selected on criteria established ensuring the books meet the needs of curriculum.

		<p>Accountability Committee will formulate criteria for purchasing of textbooks or textbook needs.</p> <p>The Textbook Accountability Committee must also be present during selection of vendor and stay in touch with the selected vendor until actual arrival of textbooks.</p>		
146.	State Department of Education Procurement 5-year Plan	All supplies are to be purchased in accordance with the purchasing cycle as set out in the five year plan and textbooks are being utilized in schools.	Evidence of textbooks purchased and being utilized in schools.	<p>Partial Compliance</p> <p>During the audit it was observed that some books have not been introduced into the classroom environment. As books were still in their boxes, or had not been delivered to the schools.</p>
147.	State Department of Education Procurement 5-year Plan	Textbook Adoption Committee. Teachers, Parents and Administrators compose this committee. The coordinators and teachers on this committee are selected to represent the subject areas of the textbooks up for adoption. The purpose of this committee is to review and assure that textbooks to be adopted conform and align with the Pohnpei State Curriculum Framework and Policies.	Evidence of input by the Textbook Adoption Committee in reviewing books for adoption to ensure alliance with Pohnpei Curriculum Framework.	<p>Non-Compliance</p> <p>There was no evidence that the committee coordinated, reviewed and assured that textbooks to be adopted conformed to the Pohnpei State Curriculum Framework and Policies. The textbooks being used in schools do met with the curriculum framework in some areas, but this was not done through the coordination process.</p>
148.	Financial Management Regulations Part 6	The DOE Administration through Budget and supply shall coordinate the purchase of all supplies and equipment in State programs.	Processes established	<p>Compliance</p> <p>Evidence was obtained during the audit that three quotes are obtained and purchase requests are submitted to the purchase officer, who submits purchase requisitions.</p>
149.	Financial Management Regulations Section 6	All property will be identified by affixing a property tag	Extent of tagging of property	<p>Compliance</p> <p>During the audit it was observed that assets tagged with the specified government property tag.</p>

150.	No documented policy	DOE will conduct annual 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	List of inventory list with ID numbers Inventory List with Principal of each school.	<p>Partial Compliance</p> <p>A detailed inventory list was provided to the auditor by the Compliance and Supply Officer for the DOE. This list provides all the necessary information on the property item as outlined in the requirements of the Department.</p> <p>On requests to the Principals of schools visited, no Principal was able to produce a list of their own property held at the school. Each principal relays on the property list held at Central Office.</p> <p>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</p>
151.	Financial Management Regulations Section 6	The Director shall maintain current fixed asset lists.	Established list	<p>Partial Compliance</p> <p>An extensive list of fixed assets is maintained, however, this list is not accurate as some items are missing from the list. (11 computers).</p>
152.	Financial Management Regulations Section 6	A physical inventory should be conducted at the end of every school year.	Inventory Reports	<p>Partial Compliance</p> <p>During the audit it was noted that not all schools had had a physical inventory of their assets conducted in a school year.</p> <p>It was noted during audits that schools are not conducting their own asset inventory if one is not conducted by the Property and Procurement Officer ensuring all property is present.</p>

Food Services

There is a food services program however it is not implemented at this time due to ongoing discussions with the Pohnpei State Legislature regarding funding.

Therefore this performance criterion can not be determined.

Below - Audit Table 29 – incorporating Performance Indicators 153 to 157

	Source	Criteria	Means of Verification	Compliance Status
153.	Pohnpei State Code of Law Education Act 1999 Title IV Part 5 § 4-18	School lunch program. There shall be a school lunch program under which school lunches shall be made available without cost to every student in every secondary school where students are on campus for two hours or more prior to noon, and, for two hours, or more after noon; PROVIDED that the department may extend the school lunch program to the primary schools of the state in similar situations upon a finding of sufficient monies and other resources to carry out the program at the primary level.	Evidence of a food program within the Secondary and Primary schools.	No currently implemented therefore cannot be determined
154.	Pohnpei State Code of Law Education Act 1999 Title IV Part 5 § 4-19	(1) The Department shall provide in its annual budget submission a separate item for the financing of the school lunch program which shall describe in detail, the costs involved and the extent and level of service to be provided.	Annual budget submitted with separate item for school lunch program.	No currently implemented therefore cannot be determined
155.	Pohnpei State Code of Law Education Act 1999	(3) The Director, in conjunction with the Governor, shall submit an	Three annual reports submitted to the Legislator.	No currently implemented therefore cannot be determined

	Title IV Part 5 § 4-19	annual report to the Legislator on or before October 15 detailing all financial activities of the school lunch program for the preceding fiscal year.		
156.	Pohnpei State Code of Law Education Act 1999 Title IV Part 5 § 4-20	The Department shall provide room and board without cost to students domiciled in the outer islands of the state and in such other remote areas as may be prescribed by the Board of Education, for attendance at the public secondary schools for the state.	Evidence of provisions of room and board provided to outer island students without cost.	No currently implemented therefore cannot be determined
157.	Pohnpei State Code of Law Education Act 1999 Title IV Part 5 § 4-21	The Director may appoint a trained and experienced nutritionist to create healthful, appropriate menus for the school lunch program and for meals for dormitory students, provide advice to food service employees, and speak to students on nutrition.	Documentation of evidence of nutritionist assisting with creation of healthy meals for both boarding and day students.	No currently implemented therefore cannot be determined

Summary of compliance determinations – Criteria 106 to 157 (52 in total)			
Category 3: Administration			
Not determined	Compliance	Partial Compliance	Non Compliance
8	9	25	10

Summary of compliance determinations			
TOTAL			
Not determined	Compliance	Partial Compliance	Non Compliance
19	40	69	29

CONCLUSION

The audit inspection found that out-dated policy and procedures exist within the Pohnpei State DOE. In 2005, the Board of Education developed policies, however it appears that document was never promulgated. The absence of current and relevant Departmental policy and procedures means that:

- Clear organizational position on specific administrative, organizational or operations issues is not relevant for the benefit of employees
- Openness and accountability is inhibited through the antiquated policy
- Organizational policy is not keeping abreast with changes in government direction and policy
- Quality assurance can not be guaranteed on duties performed
- 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 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

The *Pohnpei State Education Act 1999* provides for the establishment and operations of the Board of Education. The overseeing role of that Board is critical in providing effective guidance and advice to the Director and the department. There is no doubt in the mind of the auditor that the failure of the previous Board of Education to fulfil statutory obligations (no meetings held between August 2008 and May 2010) severely inhibited the department to meet all government and community expectations relating to quality delivery of educational services. The creation of the current Board of Education (in May 2010) can be viewed as a being a turning point for the future progress.

This audit review found a number of areas where the department partially meets outcomes it seeks to achieve. However, changes will be necessary in a number of key areas (specifically criterion where there was partial compliance). The review has uncovered that in order to enhance organizational effectiveness, the actual efforts required may not be as demanding as imagined internally by the department.

It is pleasing to observe that there is a culture of commitment within the department to effect these changes. Senior departmental executive recognized the importance of creating a disciplined and professional workforce and as such, developed and implemented the Professional Standards Project.

It should also be noted that as Pohnpei is the third of all FSM States to be reviewed, a similar picture is being observed across all FSM DOE agencies. The benefits in addressing multi-jurisdictional issues may rest in a cooperative approach by all departments rather than individual State departments attempting to resolve challenges in isolation.

ATTACHMENTS

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

Strategic Management Compliance				
	Mission, Goals and Policy			
	Source	Criteria	Means of Verification	Compliance Status
1.	Mission Statement	The State Education Mission is 'The Pohnpei State educational system recognizes its shared participation with parents, extended family and broader social structures in the intellectual, emotional, physical and social development of children. It will deliver a quality, sustainable basic education system which provides all students with basic skills, thinking skills, and personal qualities; provides for the manpower needs of the state; develops a literate population based on the revitalization of local languages and cultures while ensuring high competence in English and other international languages; and collaborates with all sectors of the government and community to fully utilize available human and financial resources in developing the educational foundation required for sustainable economic growth and social development.'	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	Partial Compliance Sustainable education systems have been developed through the Pohnpei State DOE Curriculum Framework. This has been designed to ensure that all schools are teaching students at the same level benchmarks are being met. With the development of vocational educational training for students allowing for development in the areas of skills development to ensure manpower needs of the state are met. However, in state comparisons of student performance in national standardized test, Pohnpei Students are not doing so well in the area of language competence. Pohnpei Students are scoring below proficient in some levels when tested.
2.	Strategic Goal One and Objectives	Revise curriculum and standards to allow the education system to	Evidence of progress towards compliance with performance	Partial Compliance There have been significant

		<p>support a strong and vibrant local culture while preparing students to participate in the global economy.</p> <ol style="list-style-type: none"> 1. Review and revise standards, curriculum and benchmarks for vernacular languages that support state and national language policies and support the values of respect, responsibility and honesty. 2. Review and revise standards, curriculum and benchmarks to reflect English as a second language (ESL) / English as a Foreign Language (EFL) approaches to English instruction. 3. Align standards, curriculum and benchmarks from early childhood education (ECE) to second year college (COM-FSM) programs (including vocational and life skills) to improve participation, retention and graduation rates at each level (ECE, Elementary, Secondary Transition to College). 4. Incorporation workforce readiness and soft skills into standards, curriculum and benchmarks that support development of the local and participation in the global economy. 	<p>indicators specified in Strategic Plan document</p>	<p>improvements with area of curriculum development with the new National and State Curriculum Framework. This framework incorporates benchmarks that each student is to obtain while being in line with the National language policies.</p> <p>However, the curriculum framework that has been developed at the State level is deemed by many of the teachers to be too broad in some of the subject areas and is not specific enough when giving milestones to obtain. The standards do require students to use both English and local language.</p> <p>Standards are aligned to ensure flow on from one grade to the next.</p>
<p>3.</p>	<p>Strategic Goal Two and Objectives</p>	<p>Enhance instructional programs and services to allow students to perform at grade level.</p> <ol style="list-style-type: none"> 1. Promote bilingual instruction across the curriculum and grades. 2. Provide training, support and 	<p>Evidence of progress towards compliance with performance indicators specified in Strategic Plan document</p>	<p>Non-Compliance</p> <p>Move to a learning centered approach is neither noticeably observable nor consistent across all schools. No evidence was produced to be able to measure this criterion. Teachers were not provided with follow-up support or</p>

		<p>follow-up to enhance teachers' ability to provide quality instruction in vernacular (first language) and English (ESL/EFL).</p> <ol style="list-style-type: none"> 3. Provide training that support workforce development needs. 4. Ensure that teachers meet certification requirements and teach in their areas of expertise. 5. Review, revise, develop and implement of best practices in learning centered instruction. 		<p>training to enhance quality instruction.</p>
<p>4.</p>	<p>Strategic Goal Three and Objectives</p>	<p>Design and implement systems that support and enhance the education system and improve system accountability.</p> <ol style="list-style-type: none"> 1. Create an assessment/evaluation system/cycle that focuses on both in class formative and summative assessment and system wide assessments. 2. Establish a professional development system that incorporates pre-training, training, follow up and assessment elements and responds to individual and system needs. 3. Enhance system, school and individual capacity for effective use of technology to support learning. 4. Establish a data driven decision making process for the education system. 5. Develop and implement a communications plan for the education system. 6. Ensure that secondary schools 	<p>Evidence of progress towards compliance with performance indicators specified in Strategic Plan document</p>	<p>Non-Compliance</p> <p>The only evidence seen on assessment evaluation that focuses on class formative and summative assessment was the NST provided to only a small percentage of students in grades 6, 8, and 10. This does not allow for the creation of an system wide assessment tool to be developed. There was no evidence of individual schools developing their own assessment on student performances.</p> <p>No extensive technology plan has been developed for the schools within Pohnpei. Schools do not have adequate access to computers for teachers and the internet to support learning, let alone students accessing computers for student learning.</p> <p>No evidence of a communications plan was provided for the education system. Meetings are held bi-weekly and any information is passed to select members and on forwarded to teachers</p>

		<p>are accredited.</p> <p>7. Explore models of education and financing education in developing countries and small island devaluing nations for that can impact increased student learning, provide alternate means for school governance and enhance revenue streams.</p>		<p>from this group. There is no guarantee that information is passed on.</p> <p>The secondary schools have not passed the accreditation process at this time and are undertaking the necessary steps to amend the necessary areas nominated.</p>
5.	Strategic Goal Four and Objectives	<p>Provide for safe and secure learning environments and facilities.</p> <ol style="list-style-type: none"> 1. Establish standards for facilities and facilities maintenance that incorporate the needs of special needs students. 2. Ensure that schools meet safety and sanitation requirements. 3. Expand library and physical education facilities. 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Partial Compliance</p> <p>Facilities in a number of locations have been significantly upgraded with new classrooms being constructed. Most of the classrooms are to the minimum standard with some schools require minimum work to be undertaken to achieve the necessary standards. Most of the schools have libraries and all require expansion of these facilities. Physical education facilities would be as little as purchasing of equipment such as basket balls and other such needs.</p>
6.	Strategic Goal Five and Objectives	<p>Establish mechanisms that enhance community involvement in instructional support and school operations.</p> <ol style="list-style-type: none"> 1. Develop and implement school based plans for increased community involvement in improving the school and system learning environment. 2. Increase community involvement in support of vernacular/cultural and life skills programs. 3. Expand instructional programs in concert with traditional leaders, NGO and other local 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Partial Compliance</p> <p>Most schools have community involvement through parent participation in classroom activities.</p> <p>PTA's have been established in all school communities and meetings held quarterly and on add needs bases. These PTA's are also meant to assist with supporting school programs being implemented.</p> <p>Some schools have input from traditional leaders and other local organizations, however, there needs to be care taken that they do not interfere with the implemented school program</p>

		organizations.		and required number of teaching days and learning sessions.
7.	Strategic Goal Six and Objective.	<p>Improve the quality and quantity of Pohnpeian and English instructional materials in core subjects.</p> <ol style="list-style-type: none"> 1. Provide English textbooks and instructional support materials for all core subjects and appropriate grade levels. 2. Develop vernacular and English language instructional materials for ECE - grade 3. 3. Establish quality standards for matching textbooks and instructional materials to standards and curriculum and development of vernacular and English instructional materials. 	Evidence of progress towards compliance with performance indicators specified in Strategic Plan document	<p>Partial Compliance</p> <p>Textbooks provided support most core subject learning needs and are mostly appropriate to grade levels, however, for students with learning difficulties books are at a level to high for their needs.</p> <p>English and local language books have been developed for ECE and grade 3 students which are age appropriate. These books were designed in cooperation and input from local staff.</p> <p>Textbooks are in line with curriculum standards.</p>
8.	Pohnpei State Constitution Article 7 §3 Part 1	The Government of Pohnpei shall provide educational services for the public. Compulsory education through a grade to be set by statute shall be enforced by law. Public education of citizens of Pohnpei through a grade as prescribed by statute shall be free of fees. Any fees imposed for public education shall be limited to the ability to pay	Evidence of education services provided to the public at minimal cost. Students to continue at school to such a grade as imposed by legislation.	<p>Compliance</p> <p>The audit found the Department of Education was providing free public education for eligible children in the State. And that whenever fees were imposed they were kept to a limited which was able to be paid by family members.</p>
9.	Pohnpei State Constitution Article 7 §3 Part 2	All public and private educational institutions shall comply with minimum standards of educational achievement which shall be established by the Government of Pohnpei	Evidence curriculum is being developed in accordance with National and State curriculum standards ensuring minimum standards are met.	<p>Partial Compliance</p> <p>The audit found that schools are developing curriculum benchmarks which met the minimum standards for educational achievement as established by the Government of Pohnpei. However, even with the minimum standard being applied students are still not successfully passing the NST or the</p>

				PHST in significant enough numbers. Out of the 862 students that took the PHST only 656 passed (76%).
10.	Pohnpei State Constitution Article 7 §3 Part 3	The Government of Pohnpei shall establish and faithfully execute comprehensive plans for the continual improvement of educational standards and services.	Evidence of a comprehensive plan for continual improvement for educational standards and service	Non-Compliance There was no evidence of the Government of Pohnpei executing a comprehensive plan for the continual improvement of educational standards and services.
11.	Pohnpei Code of Law Education Act 1999 Title 1 §1-2	<p>(2) The states responsibility for establishing and maintaining such schools and related facilities, programs, and other resources, as may be reasonable and necessary to provide educational opportunities for the people of Pohnpei</p> <p>(3) The need to encourage citizen involvement in educational matters by providing for schools that guarantee and support local participation consistent with the goal of a thorough and efficient system of education serving all of the people of the state of Pohnpei.</p> <p>(4) That a primary goal of education in the state of Pohnpei shall be to foster self-reliance, and that educational programs and curricula are structured to further this goal.</p>	<p>Evidence of schools established and maintained in accordance with legislative requirements.</p> <p>Evidence of the extent of PTA involvement in schools and educational matters.</p> <p>Demonstrated capacity towards self-reliance in examples of educational programs and developed curriculum.</p>	<p>Partial Compliance A number of new facilities have been built and maintenance work is being undertaken and other schools. Most schools are maintained at a minimum level allowing for educational opportunities for the people of Pohnpei. However, more could be done in the area of maintenance.</p> <p>Greater participation by PTA's within school communities to assist with achieving this outcome. PTA's need to be more actively involved in decision making process within schools.</p> <p>With the development of the Pohnpei State Curriculum Framework this goes someway to self-reliance, however, with out in-service teacher training and the development of skills for teacher's true self-reliance will not be achieved.</p>
Responsibility and Authority of the State Director of Education				
12.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (1)	The executive functions of the Department of Education shall be vested in the Director of Education who shall:	Evidence of programs of education being administered in public schools throughout the State at from Elementary to Secondary level.	Compliance The Director is fulfilling all requirements in regards to programs of instruction and education being administered in

		Administer programs of education and public instruction throughout the state of all types through the secondary level;		public schools. Programs have been developed and are being delivered from ECE to Secondary level schools.
13.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (2)	Assist the Board of Education in the performance of its duties pursuant to this act;	Evidence of demonstrated level of assistance provided to Board in ensuring performance of the Boards duties are carried out in accordance to the act.	Non-Compliance There is no evidence the Board of Education has sat since August 2008. The Director therefore is unable to perform his duties in accordance with the act. The Director should have called meetings prescribed within the act on quarterly bases.
14.	Pohnpei Code of Law Education Act 1999 Title III Part 3 § 2-6 (3)	Implement and enforce the educational standards for public schools through the secondary level as prescribed by state law and the decisions of the Board of Education	Evidence of demonstrated implementation and enforcement of educational standards as prescribed by statute and documented evidence of the any decisions in relation to enforcement of educational standards by the Board.	Partial Compliance The policies and procedures in relation to educational standards and professionalism within the public school system at all levels is found to be 'wanting' in levels of breaches of discipline that the Director is able to discipline for. The Board of Education is has not made any decisions since 2008 in relation to enforcement of standards due to it not sitting or being in existence.
15.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (4)	Promote standardized testing and research and planning for the improvement of educational programs;	1. Evidence of the promotion of standardized testing within the schools. 2. Examples of research taking place and planning for improved educational programs	Partial Compliance The NST is being undertaken within the Schools but only at levels 6, 8, and 10. There is no evidence of standardized testing at any other level to ensure learning is taking place. Teachers through their own testing are ensuring benchmarks are being obtained. The Testing Unit within the main office provides results back to the schools of the NST, however, little research is

				being undertaken of these results to improve education programs. Teachers are altering their methodologies to ensure learning takes place, and not all teachers are doing this.
16.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (5)	Prepare and submit, with the Board's concurrence, a proposed department budget to the Governor for inclusion in the state budget;	Examples of proposed department budgets presented to the Board for concurrence and to the Governor for inclusion in state budget.	Non-Compliance The recent budget was not approved due to the Director not presenting the budget to the Board for its approval prior to being sent to the Governor for inclusion in state budget.
17.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (7)	Be responsible for physical facilities planning, construction and maintenance;	Evidence of plan for facility planning, construction and maintenance.	Partial Compliance Currently there is extensive maintenance work and other classroom construction being undertaken on schools within the Pohnpei. However some schools still need basic work to be undertaken such as floor coverings and bathrooms that work.
18.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (8)	Except as otherwise provided by law, sign all drafts for the payment of monies, all commissions and appointments, all deeds, official acts, or other documents of the Department, and use a printed facsimile signature when appropriate;	Examples of at least three documents required by law for signature.	Compliance The Director signs all legally required documents prior to their dissemination. No document leaves the Department of Education without prior approval or signature by Director.
19.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (9)	Review and evaluate textbooks and materials before purchase in order to determine their suitability as may be consistent with the established curricula;	Examples of reviews and evaluations of textbooks prior to purchase showing constancy with established curricula.	Partial Compliance Textbooks were reviewed by Director prior to purchasing. However, throughout the audit it has been shown that the textbooks did not always meet the requirements of the benchmarks set out in the curriculum framework.
20.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (10)	Present to the Board, a full annual report of the principal transactions within the Department during the fiscal year, which report shall	Examples of full annual report provided to the Board with full legislated requirements.	Non-Compliance The Director has been unable to present any annual reports to the Board of Education as the Board there is no

		<p>include:</p> <ul style="list-style-type: none"> a. The number and percentage of students in public and non-public schools, to include state-wide, municipal, and individual school totals, as well as a breakdown by grade level; b. Student achievement levels, and actions being taken to improve them; and c. An analysis of the effectiveness of actions implemented to address the needs of students; and which together with any policy recommendations from the Board, shall be presented to the Governor and to the Legislature at least 20 days prior to the convening of each January regular session, and made available to the general public. 		<p>documented evidence the Board of Education has sat since August of 2008 and the current Board of Education does not have enough sworn members for a quorum to establish a meeting.</p>
<p>21.</p>	<p>Pohnpei Code of Law Education Act 1999 Title V §5-4</p>	<p>Annual Report. Private schools shall submit an annual report to the Department in a form established by the Department. Failure to comply with this requirement shall constitute an offense punishable by a fine of not more than \$100 for each offence.</p>	<p>Three (3) examples of annual reports from two (2) different private schools.</p>	<p>Partial Compliance Documented evidence was found that all schools provide to the Director of Education information on schools at the end of the school year, this information could not be called reports. However out of the five private schools in Pohnpei, four submit a one page document this document provides the most basic of information. One school provides a detailed report outlining attendance of students and teachers, qualifications of teachers, maintenance of facilities, expenditure, and parent participation in school activities, workshops and in-service training provided for teachers. This format should be followed for all private</p>

Education System – Role of Administration of DOE			
			schools.
22.	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>1. Sector grant funding is used to support and improve educational systems at primary, secondary and post secondary levels.</p> <p>2. 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
23.	Pohnpei Code of Law Education Act 1999 Title III §2 Section 3-5	The school year shall consist of not fewer than 180 sessions days divided into two semesters exclusive of holidays	<p>That the school year consists of 180 session days and does not take into account holidays</p> <p>Partial Compliance The school year is designated to consist of 180 sessions days divided into two semesters. However, it was found that a number of days a missed due to traditional leaders calling off school due to funerals or other such occasions or other needs of municipal governments. These days are not made up and semesters are short.</p>
24.	Pohnpei State Department of	The following minimum subject time	<p>1. That the students are being</p> <p>Compliance</p>

	<p>Education School Policy Manual Policy 104.1</p>	<p>allotments shall apply in all public schools in Pohnpei.</p> <table border="0"> <tr> <td>Subject</td> <td>Grade 1-3</td> <td>Grade 4-8</td> </tr> <tr> <td>Lang Arts</td> <td>90 mins.</td> <td>120 mins</td> </tr> <tr> <td>Vernacular</td> <td>20 mins.</td> <td>40 mins</td> </tr> <tr> <td>Math</td> <td>20 mins.</td> <td>40 mins</td> </tr> <tr> <td>Soc Stud.</td> <td>20 mins.</td> <td>40 mins</td> </tr> <tr> <td>Scien/Heal.</td> <td>20 mins.</td> <td>40 mins</td> </tr> <tr> <td>Art/Music</td> <td>20 mins.</td> <td>40 mins</td> </tr> <tr> <td>P.E.</td> <td>20 mins.</td> <td>40 mins</td> </tr> </table> <p>Any departure from the time allotment allocations will require express prior approval from the Director which is subject to Board of Education review upon request.</p>	Subject	Grade 1-3	Grade 4-8	Lang Arts	90 mins.	120 mins	Vernacular	20 mins.	40 mins	Math	20 mins.	40 mins	Soc Stud.	20 mins.	40 mins	Scien/Heal.	20 mins.	40 mins	Art/Music	20 mins.	40 mins	P.E.	20 mins.	40 mins	<p>taught the required level of time allotments for each of the nominated subjects.</p> <ol style="list-style-type: none"> 2. Permission is sought by teachers or principals for any departure from the required allotment allocations. 3. Curriculum is developed to ensure allotment allocations are met. 	<p>The public schools within Pohnpei comply with the minimum subject time allotments.</p> <p>Principals seek permission prior to departing from such allotment.</p> <p>Lesson plans are developed and provided to principals showing classroom instruction.</p>
Subject	Grade 1-3	Grade 4-8																										
Lang Arts	90 mins.	120 mins																										
Vernacular	20 mins.	40 mins																										
Math	20 mins.	40 mins																										
Soc Stud.	20 mins.	40 mins																										
Scien/Heal.	20 mins.	40 mins																										
Art/Music	20 mins.	40 mins																										
P.E.	20 mins.	40 mins																										
<p>25.</p>	<p>Pohnpei State Department of Education School Policy Manual Policy 104.2</p>	<p>The following minimum subject time allotments shall apply in all public high schools.</p> <table border="0"> <tr> <td>Subject</td> <td>Grade 1-3</td> </tr> <tr> <td>English</td> <td>50 mins</td> </tr> <tr> <td>Cultural Literacy</td> <td>40 mins</td> </tr> <tr> <td>Math</td> <td>40 mins</td> </tr> <tr> <td>Social Studies</td> <td>40 mins</td> </tr> <tr> <td>Science/Health</td> <td>40 mins</td> </tr> <tr> <td>Vocational Ed.</td> <td>40 mins.</td> </tr> <tr> <td>P.E.</td> <td>40 mins</td> </tr> <tr> <td>Foreign Language</td> <td>40 mins</td> </tr> <tr> <td>Computer Literacy</td> <td>40 mins</td> </tr> </table>	Subject	Grade 1-3	English	50 mins	Cultural Literacy	40 mins	Math	40 mins	Social Studies	40 mins	Science/Health	40 mins	Vocational Ed.	40 mins.	P.E.	40 mins	Foreign Language	40 mins	Computer Literacy	40 mins	<ol style="list-style-type: none"> 1. That the students are being taught the required level of time allotments for each of the nominated subjects. 	<p>Compliance</p> <p>Subjects are taught within the required allotments. This is ensured through the development of lesson plans provided to and approved by the principal.</p>				
Subject	Grade 1-3																											
English	50 mins																											
Cultural Literacy	40 mins																											
Math	40 mins																											
Social Studies	40 mins																											
Science/Health	40 mins																											
Vocational Ed.	40 mins.																											
P.E.	40 mins																											
Foreign Language	40 mins																											
Computer Literacy	40 mins																											
<p>26.</p>	<p>Pohnpei Code of Law Education Act 1999 Title III Part 2 §3-8</p>	<p>Standard achievement tests and accreditation.</p> <p>The Department of Education shall administer standard achievement tests on a periodic basis, at appropriate grade levels, as a measurement of the performance of the public and private schools of the state.</p>	<ol style="list-style-type: none"> 1. Standard achievement tests are provided on a periodic basis to the appropriate grade and analyzed to gage performance levels of public and private schools. 	<p>Partial Compliance</p> <p>There were no observable tests being applied on a periodic basis to gage performance of students. The only tests being administered at this time are the NST at the elementary level.</p> <p>However, students at the Secondary level are receiving tests on a periodic</p>																								

		The Department shall also seek membership in, or affiliation with, appropriate accreditation agencies for the purpose of raising school standards.	2. Membership sought and from an accredited agency and the standards of schools is raised.	base to gage performance levels. Partial Compliance PICS high school underwent an accreditation review by WASC March 24-25. The report submitted by the visiting team indicated that PICS did not meet all the necessary accreditation criteria. A number of areas have to be addressed before full accreditation can be awarded.
Organization of the Department				
27.	Pohnpei Code of Law Education Act 1999 Title VI § 6-3 Amendment 3-3	Department of Education. The Department of Education shall consist of the following three divisions: (1)The Division of Administration, Services, and Specialized Education. (2)The Division of Pre-School and Primary Education; and (3)The Division of Secondary Education	Organizational chart showing listed divisions displaying departmental functions.	Compliance The organizational chart shows the required legislated Divisions within the Department of Education.
28.	Pohnpei State Code of Law Education Act 1999 Division 1 Title III Chapter 1 § 1-104	Executive Departments. There is hereby provided within the executive branch of the Pohnpei Government the following executive departments. Each department shall consist of an office of the director and such divisions as are listed there under. Each department shall be under the administrative direction of a department director. No department shall have a deputy director or assistant to the director. Each division, except in instances where the director maintains direct management of the division, shall	1. Organizational chart showing indicating appropriate structure of staff and support staff.	Compliance The organizational chart outlines the required Divisions with the necessary support staff within the new requirements.

		<p>have a division chief. In addition, each department shall be composed of such support staff as the annual Comprehensive Budget Act shall allow. Policy, review, and advisory boards and councils created for oversight of department activities shall be attached to the respective department for administrative purposes.</p> <p>(2) The Department of Education shall include the following divisions:</p> <ul style="list-style-type: none"> (a) The Division of Curriculum, Instructional Development, and Specialized Education; (b) The Division of Early Childhood Education; (c) The Division of Primary Education; and (d) The Division of Secondary Education 		
	<p>State Board of Education Language Commission</p>			
<p>29.</p>	<p>Pohnpei Code of Law Education Act 1999 Title II Part 2 §2-2</p>	<p>There is hereby established a Pohnpei Board of Education which shall consist of six members. Four or five shall be appointed by the Governor and appointed from the following respective groups:</p> <ul style="list-style-type: none"> (a) COM-FSM President, or other senior executive of the College of Micronesia-FSM, resident in Pohnpei; (b) A private school representative; (c) A parent-teacher association representative; and (d) A community sector representative 	<p>Membership representatives on the Pohnpei Board of Education fulfil statutory requirements.</p>	<p>Compliance</p> <p>All newly nominated representatives of the Pohnpei Board of Education appointed by the Governor are from the legislative respective groups.</p>

30.	Pohnpei Code of Law Education Act 1999 Title II Part 2 §2-2	The Director SHALL serve as an ex-officio, non-voting member of the Board.	Level of representation by the Director of Education on the Board.	Compliance The Director is an ex-officio member. However the board has not sat since August 2008.
31.	Pohnpei Code of Law Education Act 1999 Title III Part 2 §2-3	Meetings shall be called and held at the call of the Chairman, or by a quorum, at least quarterly, and, in addition, as often as maybe necessary for the transaction of Department business.	1. Minutes of at least three meetings demonstrating a quorum was present.	Partial Compliance Minutes from meetings show that meetings are infrequent at best. October 2005 April, June, October 2006 February, August, October 2007 August 2008 Nil 2009 Nil 2010 Only 2006 meet the legislative requirements.
32.	Pohnpei Code of Law Education Act 1999 Title III Part 2 §2-3	Meetings shall be open to the public and only after adequate notice has been given	2. List of public persons attending meetings and adequate notice of upcoming meetings	Non-Compliance From minutes obtained it appears the meeting are not open to members of the public and further the public is not being notified of when meetings are taking place which allows for attendance.
33.	Pohnpei Code of Law Education Act 1999 Title III Part 2 §2-3	Members shall be notified of meetings by the Director, in writing at least two weeks before the date of any meeting.	3. Three examples of written notifications with two weeks' notice.	Non-Compliance No notification of meetings by the Director in writing showing at least two weeks notice prior to the meeting date. Notification of meetings may have been verbal.
34.	Pohnpei Code of Law Education Act 1999 Title II Part 2 §2-5 In accordance with FSMC Title 40	The powers and responsibilities of the Board shall include, but not be limited to, the following: 7. Establishing a comprehensive educational development plan consistent with the overall plans and objectives of the state government; 8. Defining specific educational	1. Level of advice provided on the development of an educational development plan on at least three separate occasions 2. Three examples of consistency of	No determination was made on this criterion. No examples of Board recommendations or establishment in comprehensive educational development plans or specific educational objectives for implementation were observed in the files.

		objectives for the state for immediate implementation, and advising the Governor on the integration of those objective with the objectives of other departments and agencies of the state government;	educational development with State Government objectives	No evidence of examples of consistency in education development with state objectives were found in files relating to the Board of Education.
35.	Pohnpei Code of Law Education Act 1999 Title II Part 2 §2-5 In accordance with FSMC Title 40	9. Assisting the Director in recruiting and hiring key education personnel;	3. Three examples of level of assistance provided to Director in recruiting and hiring personnel ensuring compliance with PS PSSR and Title 40 FSMC – 105	Non-Compliance As the Board in effect has not meet since August of 2008 and there has been a change of Director since that time, the Board has not provided this Director any assistance in the recruitment or hiring of personnel for the DOE.
36.	Pohnpei Code of Law Education Act 1999 Title II Part 2 §2-5 In accordance with FSMC Title 40	10. Adopting minimum criteria and prescribing terms for the issuance of certificates for principals and teachers, and for the renewal thereof; 11. Adopting Pohnpei-wide curriculum standards and guides; 12. Adopting procedures and minimum standards for issuance and renewal of permits for the operation of private schools'	4. Number of teachers certified, ensuring criteria implemented. 5. Three examples of Pohnpei-wide curriculum standards and guides adopted by the board. (FSMC Title 40 - 110) 6. Examples of procedures adopted for issuances for permits for operation of private schools (FSMC Title 40 - 109).	Non-Compliance The Board has not met since August 2008. However records show the Board of Education has requested the Director ensure compliance with certification for principals and teachers. Further, adopting Pohnpei-wide curriculum standards and guides, and stating these standards must be approved by the Board and in accordance with Title 40. But no action has been taken since this time.
37.	Pohnpei Code of Law Education Act 1999 Title II Part 2 §2-5 In accordance with FSMC Title 40	7. Adopting and modifying Department rules, regulations and policies.	7. Examples of adoption of rules regulations and policies.	Non-Compliance The Board has shown no adopting or modification of department rules, regulations and policies.
38.	Pohnpei Code of Law Education Act 1999 Title V §5-1	Regulation of Private Schools. Every private school shall be subject to regulation by the Department. The Board of Education shall prescribe	1. Copies of standards set for private schools regarding certification of principals and teachers, ensuring conformance	Non-Compliance No evidence of standards set for private schools regarding certification of principals and teachers ensuring

		uniform, minimum standards for the certification of the principals, teachers and curriculum of private primary and secondary schools operating within the state, which standards shall be in substantial conformance with the standards applicable to the principals, teachers and curriculums of the public schools of this state.	with state standards. 2. Copies of standards set for private schools regarding curriculum ensuring compliance with national and state standards.	conformance with state standards, by the Board of Education. No copies of standards set by the Board for private schools regarding curriculum to ensure compliance was located. These standards were to be in conformance with public schools of the State of Pohnpei.
	Language Commission			
39.	S.L. 6L-83-06 §3 (1)	The Commission's duties and functions shall be to act in an advisory capacity to the State Government with respect to all issues relating to Pohnpeian languages. The powers and responsibilities of the Commission shall include, but not limited to, the following: 1. Review the state's comprehensive educational development plan to ensure that the plan provides adequate attention to the preservation of Pohnpeian languages;	1. Examples of plan displaying preservation of Pohnpeian languages.	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
40.	S.L. 6L-83-06 §3 (1)	2. Defining specific language initiatives for the State, and advising the Governor on the integration of those initiatives with the objectives of other departments and agencies of the State Government;	2. Examples of specific language initiatives	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
41.	S.L. 6L-83-06 §3 (1)	3. Adopting, maintaining, and continuously improving official Pohnpei system of vocabulary,	3. Examples of consistency of Pohnpei systems of vernacular studies.	This criterion can not be measured at this time as the Board has not been established by the Governor. The

		grammar, orthography, counting systems, and honorific language;		business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
42.	S.L. 6L-83-06 §3 (1)	4. Advising, reviewing and commenting upon educational programs that inform the public on the value and to the preservation of Pohnpeian languages;	4. Extent of comments to public on value and preservation of Pohnpeian languages.	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
43.	S.L. 6L-83-06 §3 (1)	5. Encouraging, in cooperation with appropriate public and private agencies and institutions, educational and other programs designed to further the use of Pohnpeian languages;	5. Level of advice and encouragement provided on the development and design on Pohnpeian language programs.	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
44.	S.L. 6L-83-06 §3 (1)	6. Advising and reviewing proposed and planned publication of books, pamphlets, periodicals, instructional materials and other publications on Pohnpeian systems of language, including vocabulary, grammar, orthography, counting systems, and honorific language;	6. Level of advice and appropriate review conducted on resources utilized for the Pohnpeian systems program of learning.	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
45.	S.L. 6L-83-06 §3 (1)	7. Developing radio programs designed to further the use of Pohnpeian languages;	7. Examples of radio programs developed and initiated.	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot

				take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
46.	S.L. 6L-83-06 §3 (1)	8. Informing and educating National, State and Local Governments, other nations and international organizations, and private groups and individuals as to the Commission's authorized activities; and	8. Examples of information packages provided interested organizations, internal and external to the FSM.	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
47.	S.L. 6L-83-06 §3 (1)	9. Preparing and submitting to the Legislature and the Governor an annual budget and an annual program and status report, describing the activities of the Commission for the previous year and setting forth its goals and strategies for the future.	9. Examples of budgets submitted and status reports outlining goals and strategies for the future	This criterion can not be measured at this time as the Board has not been established by the Governor. The business of providing advice on any of the legislative requirements cannot take place until such time as the Governor nominates and swears in members of this board and gives them a working budget.
Employment Practices				
48.	Pohnpei State Code of Law Education Act 1999 Division 1 Title 9 § 2-104	The Pohnpei Public Service System shall be administered in accordance with the merit principles set forth below: (1) Equal opportunity for all regardless of sex, race, age, religion, political affiliation, ancestry, family 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.	Partial Compliance The Pohnpei DOE has adopted the minimum qualification set out in the National Teacher Certification Program. Twenty-Three (23 – 4.4%) of teachers are assigned to teaching duties who do not meet the minimum standard. Out of the 34 school facilities, only 3 (9%) of the Principals are females. This suggests that there is a gender bias in the selection of females to senior positions within the department.
49.	Pohnpei State Code of Law Education Act 1999 Division 1, Title 9	(2) No discrimination against any person because of a physical handicap unconnected to his	Analysis of employed with handicap unconnected to the ability to perform their duties.	Compliance There is no evidence that the Department of Education discriminates

	§ 2-104	ability to perform effectively the duties of the position in which he is employed or in which he is seeking employment; PROVIDED that the employment of said physically handicapped person will not be hazardous to him nor endanger the health and safety of others.		against persons with handicaps. However, the Department of Personnel provides the list of possible candidates for DOE to select from.
50.	Pohnpei State Code of Law Education Act 1999 Title IV Part 1 § 4-1	Qualifications for Principals. Principals, and those serving in that capacity, shall meet the Department's certification requirements and shall have served as a teacher for not less than five years, at least one year of which shall have been served as a teacher or exchange principal in the schools of the state.	Minimum qualification set by department for teacher to become principal at the appropriate level school.	Compliance Evidence was provided that all principals in positions have the required level of certification and the required number of years served at level prior to becoming principal.
51.	Pohnpei State Code of Law Education Act 1999 Title IV Part 1 § 4-2	Consideration in appointing teachers. In the appointment of teachers by the Director, preference shall be given to residents of the state, of the same standing, grade, or rating, as non-resident candidates. The rating of a teacher shall not depend upon the number of pupils promoted or graduated, but upon the length of service, efficiency and ability of the teacher. Persons appointed to teaching positions in primary schools shall have at least an associate's degree, and persons appointed to teaching positions in secondary schools shall have at least a bachelor's degree, from an accredited institution of higher	Number of teachers certified. Consideration given to those who are residents of the State. Evidence of Primary school teachers to have minimum standard of Associate Degree and Secondary School Teachers to have Bachelor's Degree. Evidence of Teachers in Pre-School and Primary School being fluent in Pohnpeian Language.	Partial Compliance There is no evidence of a State certification; however, the National Teacher Certification is adopted. It was established that there is currently about 18 teachers who do not meet the minimum standards for National Certification. Teachers engaged in teaching positions in the Division of Pre-School and Primary Education is fluent in the Pohnpeian language, however, teachers at the ECE level are the majority without the required qualifications.

		learning. In addition, all persons appointed to teaching positions in the Division of Pre-School and Primary Education shall be fluent in the Pohnpeian language.		
52.	Pohnpei State Code of Law Education Act 1999 Title IV Part 1 § 4-3 (1)	Teachers; certification; suspension; revocation. No person shall serve as a teacher in any public or private school in the state without first having been certified by the Department and issued a certificate, without cost, in such form and for such duration as the Board determines. The Board shall establish types of certificates in the educational field, and the requirements to qualify for each type of certificate.	Evidence of teachers without minimum certification being suspended or having teachers certification revoked. Evidence of Board of Education establishing types of certificates and qualification requirements.	Non-Compliance There is no evidence that any teacher without the required certification has been suspended. There is no evidence the Board of Education has developed or implemented types of certificates for teachers and the necessary qualification requirements for each level of certificate.
53.	Pohnpei State Code of Law Education Act 1999 Title IV Part 1 § 4-3 (2)	The Director shall establish procedures to verify the authority of certificates and other documentation proffered by prospective teachers who are not citizens of the Federated States of Micronesia.	Evidence of verification procedures for certificates obtained from teachers who are not FSM citizens.	Compliance Evidence is obtained from those persons in the form of a certified copy of the documentation provided. Documentation that is not certified will not be accepted by the Department or Director.
54.	Pohnpei Code of Law Education Act 1999 Title III Part 3 §2-6 (6) Ref: FSMC Title 40 -110	Hire, certify, and evaluate department personnel, in coordination with the Division of Personnel, Labor and Manpower Development.	Requirements of Division of Personnel, Labor and Manpower Development are followed and implemented in the form of staff performance reviews.	Non-Compliance There was no evidence available showing performance evaluation by supervisors done periodically on employees' under their supervision. No staff members have been assessed on their work performance or in accordance with the PSS meet with personally to establish performances. Teachers are observed in classroom environments and the IOTA form is

				used and discussions are undertaken in pre and post meetings. There is no written record of these meetings placed in the teacher's personnel files.									
	Assignment of Personnel												
55.	No documented policies and procedures exist. Adopted as current practice.	The State Director shall make all assignments of personnel to schools on the best interest of the school system.	DOE criteria for assignment to schools. Teacher assignment data. Equity in assignments.	Partial Compliance No documented policies relating to assignments were provided. Advice from Director on approach was provided during interviews. However, some schools appear to have a large student teacher ratio which is not in the best interest of the student or the teachers.									
56.	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.	Partial Compliance Again this criteria had no documented polices however, the approach taken by the Director considered teacher qualifications and certification, school requirements and what was in the best interest of the Educational System. Teacher numbers for each of the schools need to be reviewed and addressed for teacher / student ratios.									
57.	Pohnpei State Public Service Systems Regulations Part 1 Policy 101	Acceptable student / teacher ratios, governing class size for instruction will be based on the following general guidelines: <p>101.1 Elementary School: Class size for regular program</p> <table style="margin-left: 20px; border: none;"> <tr> <td>Grade K</td> <td>Max 20/1</td> <td>Min 10/1</td> </tr> <tr> <td>Grades 1-3</td> <td>Max 25/1</td> <td>Min 15/1</td> </tr> <tr> <td>Grades 4-6</td> <td>Max 25/1</td> <td>Min 15/1</td> </tr> </table> <p>101.2 Jr. High School: Class size for</p>	Grade K	Max 20/1	Min 10/1	Grades 1-3	Max 25/1	Min 15/1	Grades 4-6	Max 25/1	Min 15/1	Evidence of appropriate allocation of teacher / student numbers in accordance with policy.	Partial Compliance During the course of the audit, it was found that at least half of the class sizes met the guidelines as set out in the Pohnpei State Public Service Systems Regulations. However, some class sizes are over the maximum allowance. Some of these classes have been allocated teacher aides where available to assist the teacher, this does not happen at all schools.
Grade K	Max 20/1	Min 10/1											
Grades 1-3	Max 25/1	Min 15/1											
Grades 4-6	Max 25/1	Min 15/1											

		<p>regular program</p> <p>Grade 7-8 Max 20/1 Min 10/1</p> <p>101.3 High School: Class size for regular program</p> <p>Grade 9-12 Max 20/1 Min 10/1</p> <p>101.4 Vocational Education: Class size</p> <p>Teacher Program Max 30/1 Min 15/1</p> <p>Business Program Max 30/1 Min 15/1</p> <p>Trades Program Max 20/1 Min 10/1</p> <p>Computer Program Max 40/1 Min 20/1</p> <p>101.5</p> <p>Home Arts: Max 25/1 Min 20/1</p> <p>Agriculture: Max 25/1 Min 20/1</p> <p>101.6</p> <p>Special Education and Head-start classes shall be governed by the applicable FSM Regulations.</p>		
58.	Pohnpei State Public Service Systems Regulations Part 1 Policy 101	Exceptions to the parameters established in the policy will be made only with the express approval of the Director of Education, with justification available to the Board upon request for review purposes.	Examples of approval for changes from Director with reviews from Board showing relevant justification.	Non Compliance There was no evidence provided showing any school with oversized classes seeking approval from Director to maintain oversized classes, or providing a written review through the Director to Board of Education showing justification for the continuation of the oversized classes.
59.	No documented policies and	Principles will manage use of	1. Evidence of allocation of	Partial Compliance

	<p>procedures exists. Adopted as current practice at a local level.</p>	<p>Curriculum Subject 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. 	<p>Curriculum Subject Specialists.</p> <p>2. Evidence of Curriculum Subject Specialists' work programs.</p>	<p>Curriculum Specialist is assigned to the specialist curriculum areas. There is evidence of Specialists having developed instructional material plans for each of the specialist areas. Specialists are assigned schools which they visit on a quarterly bases, to assist teachers with instructional needs however, Specialists do attend to other schools on a as need bases. Some schools stated they had not been visited by a curriculum specialist at all.</p>
Services with Children with Disabilities				
60.	<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>Partial Compliance The most recent Focused Monitoring Report (October 2009) noted significant improvement in the efforts of the Pohnpei 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 PDOE correcting all areas of outstanding non compliance from previous years and the timely submission of LPP and Quarterly Progress Reports. However, there were seven new areas of non-compliance identified during the monitoring visit.</p>
61.	<p>FSMC, Title40. Education Chapter 2 §235. State responsibility.</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</p>	<p>Copies of last 3 annual reports.</p>	<p>Compliance The Focused Monitoring Report in October 2009 highlighted the improvement by PDOE in the timely</p>

	Source: COM PL 7-55 § 5; TT Code 1980, 41 TTC 205; PL 8-21 § 5.	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.		submission of LPP and Quarterly Progress Reports. The Report commended the PDOE for improvements in the quality of special education program activities with the State Education system and the implementation of the provisions of their LPP.
62.	§236. Procedure to ensure efforts. Source: COM PL 7-55 § 6; TT Code 1980, 41 TTC 206; PL 8-21 § 6.	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.	Copies of last 3 monitoring reports.	Partial Compliance While the Focused Monitoring Report found that there had been improvement in the quality of services within the special education program in Pohnpei, there is still significant areas of improvement required as nominated within the monitoring report.
63.	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 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.
64.		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	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".	Partial Compliance. Monitoring visits are conducted each year. The October 2009 found that over the last 12 months, the Pohnpei DOE had corrected all areas of non compliance for 2008. However, the monitoring review did find another seven areas of non-compliance. The Pohnpei DOE had not corrected all

		<p>monitoring team responsible for conducting the school visits.</p> <p>2.2. Establish a school visit schedule that ensures all schools will be monitored at least every 3 years.</p> <p>2.3. Schedule and conduct monitoring visits to selected schools.</p> <p>2.4. Transmit LEA School Monitoring Report within 10 days of the visit.</p> <p>2.5. Facilitate agreed upon "actions to be taken" based on the recommendations developed for the school.</p>		<p>areas on non-compliance from previous years and 2009 was the first time they had been elevated to 'meets requirements' status.</p>
65.		<p>3. LEA Enforcement Actions</p> <p>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>Partial Compliance</p> <p>The Focused Monitoring Report identified that the previous area of non compliance regarding internal monitoring of programs and services had been corrected. The report further found that the Internal Monitoring Action Plan was comprehensive. However, it further stated that there was no evidence of Monitoring Reports or Corrective Actions being taken from findings. There is no person assigned with the responsibility of over-viewing the internal monitoring system and case management process.</p>
66.		<p>LEA Quarterly Reports</p> <p>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.</p>	<p>Last 3 Quarterly reports.</p>	<p>Compliance</p> <p>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</p>

67.		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 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 Children				
68.	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	Non Compliance There is no evidence of any programs to identify and encourage students who demonstrate an astonishing ability to learn. When asked during the interviews of teachers what do gifted programs do you run at the school. No school indicated they have a program that recognizes students that are gifted.
Public Reporting				
69.	Pohnpei State Code of Law Education Act 1999 Title II Part 2 § 2-3	Organizations and meetings. Meetings shall be called and held at the call of the chairman, or by a quorum, at least quarterly, and, in addition, as often as may be necessary for the transaction of	Examples of minutes from the last three (3) quarterly meetings held showing these meetings were open to the public.	Non Compliance The Board of Education has not sat since August of 2008 with is no documented evidence to indicate they have called a board meeting in 2009 or 2010. The board is newly sworn in and

		Department business. Meetings shall be open to the public and shall be held only after adequate public notice has been given.		has not had a meeting to appoint positions within the board.
70.	Pohnpei State Code of Law Education Act 1999 Title VII § 7-4	Records; evidence. A department shall cause all of its proceedings and acts to be recorded, and such records, from time to time, but at least annually, to be filed in the department archives. A certified copy of a record, or any portion thereof, when authenticated by the department director, under the department seal, shall be competent evidence in any court, of all that it contains.	<ol style="list-style-type: none"> 1. Three (3) examples of proceedings and acts recorded annually and filed in the department archives. 2. Ensure copies have been certified as a copy. 	Partial Compliance Copies of acts affecting the Department have been filed with the department archives. Copies of acts were not seen to be certified. However, these copies have been authenticated and signed by the Director under the Department seal.
71.	Pohnpei State Code of Law Education Act 1999 Title VII § 7-5	Department publications. A department may prepare or cause to be prepared, printed and published, such reports, pamphlets, duplicates, outlines, brochures, etc., as in the discretion of the department may seem advisable, and sell or otherwise dispose of such publications.	Examples of reports pamphlets which provide information to the general public, last three (3) public reports or pamphlets.	Compliance The Department has published a number of pamphlets as sources of information to the public. These documents have been produced at the discretion of the Department. DOE SPED develop and print a number of flyers/brochures which provide a summary of the Pohnpei State's LPP.
	Role of the Community			
72.	Pohnpei State Code of Law Education Act 1999 Title II Part 2 § 1	There is hereby established a Pohnpei Board of Education which shall consist of six (6) members..... Four of the five members appointed by the Governor shall be drawn from the following respective groups: (a) COM-FSM President, or other senior executive of the College of Micronesia - FSM, resident in Pohnpei; (b) A private school representative; (c) A parent-teacher association	<p>Evidence that there is a representative from the parent-teacher association.</p> <p>Evidence that there is a representative from the community sector.</p>	Compliance Those members nominated for the Board of Education and in met the legislative criteria.

		representative; and (d) A community sector representative.		
73.	Compact II (implicit intent)	Initiatives towards Community Based Management practices / structures	Extend the role of community in local school structure.	Partial Compliance DOE needs to be more actively moving towards school centered management processes. When conducting interviews with schools it was established that PTA's were more active in some school communities than others. The task of an integrated Community Based Management structure needs more consideration.
74.	No documented policies and procedures exists. Adopted as current practice at a local level.	Parent and Teacher Associations (PTA's) are established in all schools (Private and Public)	Evidence of established PTA's	Compliance All schools have PTA's which are attended by teachers, principals and parents.
75.	No documented policies and procedures exists. Adopted as current practice at a local level.	PTA members are to have regular meetings every quarter or when necessary when important issues arise	Documented evidence of quarterly meetings held	Compliance Meetings are held on quarterly bases with minutes being taken and kept at each of the individual schools. PTA's also undertake to meet on an add needs bases when urgent matters arise in relation to school issues.
76.	No documented policies and procedures exists. Adopted as current practice at a local level. JEMCO indicator 18: Number of parent involvement activities per year.	PTA members are to have greater involvement in school activities, without interfering with the school curriculum.	Demonstrated evidence of parent involvement in school activities	Partial Compliance At the present time PTA's involvement within the school is limited to fund - raising, assisting with cleaning of school grounds and some parents assist with teachers in ECE and grade 1 class. Teachers in higher grades stated parents that were involved would do the work of the students. However, there was no data on the number of parent involvement activities per year.
77.	No documented policies and procedures exists. Adopted as	Ensure Principal is an active member of the PTA	Evidence of the level of involvement by the Principal	Compliance All principals are actives members of

	current practice at a local level.			their PTA's. This was confirmed during workshops and interviews with teachers separate from principal and members of the community. In some instance the principal is the driving force behind the PTA's.
	Strategic Planning			
78.	Pohnpei State Education Strategic Plan 2008-2012	Annual work plan (Annual School Improvement Plans) developed and implemented	Current Annual Plans	Partial Compliance All Schools are required to develop School Improvement Plans. These plans are more consistent with the DOE budgetary requirements for the schools than they are with sustainable long term improvements for the schools.
79.	Pohnpei State Education Strategic Plan 2008-2012	Annual formative assessment conducted and report disseminated	Most recent assessments report on activities to date	Partial Compliance There was no evidence of an accreditation team to monitor the progress of the Strategic Plan. No reports have been prepared on the progress of the Strategic Plan. However, chiefs of each of the divisions meet on weekly bases to discuss achievements in regards to plans (strategic).
	Early Childhood Education			
80.	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 An analysis of enrolment numbers and teacher data confirms that standard classes established for class size and student / teacher ratio are being adhered to. It must be noted that in Pohnpei Education Act 1999 the minimum enrolment is 15 children.
81.	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	Teacher and class data	Compliance The Policy Council has been replaced with the Parent Committee. This Committee is made up of members from each of the 21 centres. Staff

		must conduct a self-assessment of their effectiveness and progress in meeting program goals and objectives.		members from ECE along with the Parent Committee and other specialists from DOE undertake a self-assessment of the program and its effectiveness.
82.	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 Evidence was obtained to show there is a curriculum structure established along with an organizational structure however, this structure has not been approved by the Director at this time. The structure gives a broad overview of major functions but does not fully address the mechanisms of staff supervisions and support.
83.		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	Partial Compliance Currently there are 7 teachers (these are mostly teacher aids) that are not meeting the NDOE minimum standards established. Teachers without certification are being given opportunity to study at COM on a part-time basis to acquire the necessary qualification.
84.		Staff performance appraisals. The program must, at a minimum, perform annual performance reviews of ECE staff members 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	Annual performance review Staff training and professional development	Partial Compliance Performance reviews are being conducted by Supervisors of ECE centres along with the principal, specialists and teacher supervisors. However there is no director evidence that these reviews conducted link directly to any professional development needs or in anyway improve the skills of teachers.

		competencies.		
85.	Pohnpei State Code of Law Education Act 1999 Title II Part 4 §2-7 (2)	The Division of Pre-School and Primary Education shall administer programs of education and public instruction at the pre-school and primary school levels; PROVIDED that: (a) The department may establish and maintain a kindergarten class as a part of any public primary school where there is a kindergarten enrolment of at least 15 students; and (b) Each public primary school shall have at least one teacher assigned thereto and no school shall have less than three grades, first through third.		Compliance ECE centres are established at public primary schools where there is an enrolment of at least 15 students. Teacher data indicates that there is at least one teacher assigned to the class.
86.	Pohnpei Department of Education School Policy Policy 101.1	Acceptable Student / Teacher rations, governing class size for instruction will be based on the following general guidelines: Elementary School: Class Size for Regular Program. Grade K Max 20/1 Min 10/1 Grad 1-3 Max 25/1 Min 15/1		Compliance ECE centres are established at public primary schools where there is an enrolment of at least 15 students. Teacher data indicates that there is at least one teacher assigned to the class.
	Curriculum and Instruction			
87.	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	Partial Compliance National Curriculum Minimum Standards were developed by a working group, including representatives from Pohnpei 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.

88.	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.
89.	Pohnpei State Code of Law Education Act 1999 Tile II Part 2 §2-5 (7)	Adopting Pohnpei-wide curriculum standards and guides.	Copies of Pohnpei State curriculum standards.	Compliance The development of the Pohnpei DOE Curriculum Frameworks document in August 2009 with the support of PRIDE
90.	No documented policy. Though is regarded as essential criteria and a base level standard of educational services.	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. Focus group meetings with teachers reveals that all teachers use and acknowledge the usefulness of the developed curriculum, most teachers indicated that the benchmarks were too broad and most found it difficult to implement into lesson plans.
91.	No documented policy. Though is regarded as essential criteria and a base level standard of educational services.	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 any data being collected or a needs assessment being conducted or reports being provided on a regular basis to the Director in relation to the curriculum status.
92.	No documented policy. Though is regarded as essential criteria and a base	The State Director of Education shall establish a core curriculum in which each student shall demonstrate	Core Curriculum developed	Compliance Core curriculum has been developed by a working group of subject specialist, in

	level standard of educational services.	competency prior to graduation from secondary school.		consultation with secondary and elementary school teachers. There was some support and coordination from the State Curriculum coordinator.
93.	No documented policy. Though is regarded as essential criteria and a base level standard of educational services.	Minimum requirements of a core curriculum are: 1. Language –oral and written. 2. Social Studies. 3. Science. 4. Math 5. Vocational Skills.	Core curriculum documents for all subjects	Compliance School core curriculum benchmarks for English Language Arts, Social Studies, Science and Maths have been developed. Curriculum for vernacular language has also been developed.
94.	No documented policy. Though is regarded as essential criteria and a base level standard of educational services.	The State Director of Education reviews, on an established schedule, all instruction and curriculum programs offered throughout the State.	Schedule of review	* This criterion cannot be assessed as the Pohnpei DOE Curriculum Framework was implemented in August of 2009. This has not allowed for enough time to schedule a review of the current program.
95.	No documented policy. Though is regarded as essential criteria and a base level standard of educational services.	The State Director will designate staff persons to review and monitor all instruction and curriculum programs.	Schedule of review Personnel assigned	Partial Compliance The Director has in place a designated staff of Curriculum Specialists to undertake a review of the curriculum programs however, there is limited evidence that monitoring instruction is taking place of the curriculum programs. Greater emphasis needs to be placed on the monitoring and review of the curriculum programs to ensure quality and appropriateness of the curriculum programs.
	Staff Development			
96.	Pohnpei State Code of Law Education Act 1999 Title IV Part I §4-4	In addition to such leave as may be authorized for state employees generally under the Public Service System, the Department may grant a sabbatical leave of absence to any teacher. In granting a sabbatical leave, the Department shall consider, among other things, the	Number of teachers granted sabbatical leave. Examples of course outlines of studies undertaken. Relevance of study undertaken by those granted sabbatical leave.	Non-Compliance During the course of this audit only one school principal indicated that she allowed one teacher time off on sabbatical leave to undertake further studies. The relevance of study was approved by the teacher to ensure it was in the area of the teacher's field.

		<p>following:</p> <ol style="list-style-type: none"> 1. The nature and length of professional study, research or other activity proposed by the applicant; 2. The applicant's seniority, provided that seniority shall not be the dominant factor in granting sabbatical leave; and 3. The relationship of the proposed activity to the Department's needs and priorities. 	<p>Appropriateness of activity and Department needs and priorities ensured.</p>	<p>There is no evidence of any other school or staff member being given sabbatical leave to undertake further studies.</p> <p>Staff members were undertaking study in their own time through on-line commitment or through COM.</p>
97.	<p>Pohnpei State Public Service System Regulations Part 10 §10.1</p>	<p>Job-Skill Training - is training intended to improve the employee's performance on his present job or other closely related one.</p>	<p>Staff members (not exclusive to teachers) that are allowed to improve work skills through training opportunities.</p>	<p>Non-Compliance</p> <p>There is no evidence that staff members (Administration) are provided any work skills improvement through training opportunities, either through in-service training or through a recognised institution such as COM.</p>
98.	<p>Pohnpei State Public Service System Regulations Part 10 §10.3</p>	<p>Employee Development - is training intended to improve the employee's abilities and potentials, but is not directly related to his present or impending job.</p>	<p>Staff members (not exclusive to teachers) given opportunity to attend training to improve abilities.</p> <p>Outline of available training opportunities for staff members.</p>	<p>Non-Compliance</p> <p>No evidence of training opportunity to staff members to attend training to improve abilities or skills</p> <p>No outlines of available training for staff members</p>
99.	<p>Pohnpei State Public Service System Regulations Part 10 §10.5</p>	<p>Evaluation of Training - The Office of Human Resources shall develop and maintain a system which will provide information and analysis of the effectiveness of training provided. All personnel who attend training courses outside of Pohnpei State are required to submit a written report, includes a summary of the course, along with a judgment of the added value gained from the course.</p>	<p>Examples of reports submitted with judgments on training undertaken.</p> <p>Examples of analysis of effectiveness of training provided to participants.</p>	<p>Non-Compliance</p> <p>No reports were submitted outlining judgments of training undertaken, relevance or benefits to DOE. Further, there was no evidence of any analysis conducted on the effectiveness of training provided to participants and the ability to implement this training to other staff member of DOE.</p>
	<p>Testing Program</p>			

100.	Pohnpei State Code of Law Education Act 1999 Title III Part I § 3-8	Standard achievement tests and accreditation. The Department shall administer standard achievement tests on a periodic basis, at appropriate grade levels, as a measurement of the performance of the public and private schools of the state. Designee: Instruction and Curriculum, Testing Specialist	Pohnpei State Code of Law Education Act 1999 Title III Part I § 3-8	Partial Compliance There are no organizational policies and procedures relating to the testing program, however the only testing that is done on any regular annual bases is the NST, PHST and the COMET. These tests are administered by the Testing Specialist within the Testing Unit. There is no evidence that teachers administer weekly subject tests to evaluate appropriateness of learning materials or to gauge student learning.
101.	No documented Policy	The Testing Specialist will: 1. Review for: a. Cultural appropriateness. b. Student's needs. c. Applicability to Pohnpeian society. d. Reliability and validity. 2. Recommend changes in test use or type of test. 3. Take action.	No documented Policy	Partial compliance The testing specialist is actively involved in administering the NST, the PHST and the COMET. Guidelines for testing include development of test materials, preparation for Test Administration and Testing Administration. New tests have been developed which are trying to be have cultural appropriateness and applicability to Pohnpeian society. Review is built into the testing guidelines but no report highlights actual review methodology not outcomes of review. No results were available for the tests administered 2009.
State Scholarship and Loan Fund				
102.	Regulations for the Administration of the Pohnpei State Postsecondary Scholarship Funds Part 1 § 1.3	Applicability. Except as otherwise specified by law, these regulations shall apply to the administrations and expenditure of all fund appropriated for the Pohnpei Scholarship Funds. 1. Funding for the Pohnpei	Funds made available for the Pohnpei Scholarship Funds through the legislative requirements of the Comprehensive Budget Act.	Compliance Scholarship grants are allocated through two separate sources as determined annually in the Comprehensive Budget Act and in accordance with the provisions outlined in regulations and guidelines.

		<p>Scholarship fund shall be determined annually in the Pohnpei Comprehensive Budget Act.</p>		
<p>103.</p>	<p>Pohnpei State Code of Law Chapter 10 § 10-125</p>	<p>Duties and functions of Board. The duties and functions of the Board shall be as follows:</p> <ol style="list-style-type: none"> 1. The Board shall have the authority, consistent with this subchapter, to award scholarships out of all available funds; 2. The Board shall specify the procedures by which applications for scholarships are to be taken and the process by which final decisions on the award of scholarships are to be made; 3. The Board shall establish eligibility requirements and curricular criteria on which the award of scholarships shall be based, that shall be designed to advance the purposes of the Pohnpei Development Plan by restricting scholarship awards to students pursuing courses of study in subject areas deemed to be high priority by the state government. Subject to 18 PC 10-131 The Board shall be in consultation with appropriate officials from state government agencies or departments for identifying the high priority subject areas of study for Pohnpei. The requirements and criteria established pursuant to this subsection shall also be 	<p>Evidence of scholarships being awarded out of available funds.</p> <p>Establishment of Selection Criteria</p>	<p>Compliance</p> <p>Scholarships awarded are awarded within the authority of the Board and within available funds to the Board.</p> <p>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.</p> <p>Reports are furnished by the Board in accordance with legislative requirements.</p> <p>Scholarships are awarded in areas of economical need for the Federated States of Micronesia. A wide range and diversity of scholarships have been awarded over the years.</p>

		<p>designed to ensure that only students of high academic achievement or demonstrated capacity to perform well in their chosen fields of study shall be awarded scholarships provided under this chapter;</p> <p>4. The Board may establish any other terms and conditions for the receipt and use of and loss of scholarships;</p> <p>5. The Board, through the Director, shall prepare and submit to the Legislature at the end of every school year an annual report on the status of the scholarship funds administered by the Board and the director pursuant to the subchapter, and an accounting of scholarships awarded, including, but not limited to, the respective fields of study for which the scholarship awards were used for that year; and</p> <p>6. The Board shall give due consideration to supporting the growth and development of post-secondary educational institutions within the Federated States of Micronesia in making its decisions on the award of scholarships grants.</p>		
<p>104.</p>	<p>Regulations for the Administration of the Pohnpei State Postsecondary Scholarship Funds Part 4 § 4.1</p>	<p>Maximum Scholarship Award. The maximum scholarship award shall be determined annually by the Scholarship Committee and be approved of by the Director. Scholarships awardees will receive a scholarship financial package.</p>	<p>Financial packages developed for awardees and maximum scholarships awarded.</p>	<p>Compliance Scholarships are allocated by the Scholarship Committee and approved by the Director. Financial packages are prepared by the Scholarship Unit Staff member and provided to the awardees.</p>

<p>105.</p>	<p>Pohnpei State Code of Law Chapter 10 § 10-128</p>	<p>Recipient general requirements. Each recipient of a scholarship provided under this subchapter shall, at the time of the award:</p> <ol style="list-style-type: none"> 1. Be a legal resident and citizen of Pohnpei who has been accepted to attend and able to prove such acceptance, or be attending a post-secondary institution as provided under this subchapter; 2. Anticipate and thereafter enrol in, or be enrolled in an academic program leading to a bachelor's or graduate degree as provided under this subchapter at a United States of America-accredited post-secondary educational institution in the Federated states of Micronesia, the United States of America or its territories and possessions, the Republic of the Marshall Islands or the Republic of Palau; and 3. Have maintained a satisfactory grade point average as provided by 18 PC 10-131; 4. Each student receiving a scholarship provided under this subchapter shall be obligated to work within Pohnpei State for a period not less than the number of years he received such scholarships; PROVIDED that such employment is available. 	<p>Criteria set in accordance with the legislative requirements.</p> <p>Evidence of students being enrolled in stated accredited educational institutions.</p> <p>Documented of required grade point average.</p> <p>Documented requirement placing obligation on recipient of the scholarship to work within the FSM for the required number of years (Contract).</p>	<p>Compliance</p> <p>Evidence was obtained that all recipients of scholarships are citizens of the FSM. Prior to any funding being provided to awardees evidence of enrolment from accredited educational institutions is obtained. That is the institutions contact the scholarship staff with the enrolment details.</p> <p>Awardees must provide evidence of grade point average as part of the scholarship application.</p> <p>Evidence was obtained that a guarantee is sought from the awardees (usually a contract) that they will return to the FSM and undertake a required number of years in the FSM in the field of study undertaken.</p>
<p>Scholarship Board</p>				
<p>106.</p>	<p>Pohnpei State Code of Law Division II Title 18 Subchapter II § 10-125</p>	<p>1. The Board shall have the authority, consistent with the subchapter to award scholarships out of all available funds.</p>	<p>Scholarships awarded out of funds available.</p>	<p>Compliance</p> <p>Scholarships are being awarded by the Scholarship Board. Funds are made available for scholarships.</p>

		<p>2. The Board shall specify the procedures by which applications for scholarships are to be taken and the process by which final decisions on the award of scholarships are to be made.</p>	<p>Documented procedures outlining the process for the awarding of scholarships to applicants.</p>	<p>Guidelines outlining the necessary requirements and producers applicants must follow for scholarships for final decisions on who will be awarded scholarships.</p>
<p>Private Schools</p>				
<p>107.</p>	<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 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>	<p>Copies of Annual license applications from private schools signed by Director and State Board of Education.</p> <p>Submission to Secretary of National DOE with written application of charter.</p> <p>Evidence of issuance of annual licence on confirmation from State Director of Education school is operating within terms of approved charter.</p>	<p>Partial Compliance Evidence was obtained of submission of applications from private schools for renewal of permit being reviewed by Director. The Board of Education has not reviewed any application for renewal of permit since 2008 due to the Board not being active.</p> <p>Further, these applications were forwarded to the Secretary of Education NDOE for approval and issuance of annual licence.</p> <p>There is no documented evidence that the Director of PDOE has made any visits to non-public schools to ensure they are operating consistent with the terms of its charter and other required regulations.</p>

108.	Pohnpei State Code of Law Education Act 1999 Title V § 5-1	Every private school shall be subject to regulation by the Department. The Board of Education shall prescribe uniform, minimum standards for the certification of the principals, teachers and curriculum of private primary and secondary schools operating within the state, which standards shall be in substantial conformance with the standards applicable to the principals, teachers and curriculums of the public schools of this state. Private school premises shall also be held to comply with state standards with regard to sanitation and public safety.	<p>Documented evidence of standards for certification in accordance with state curriculum standards.</p> <p>Documented evidence of standards for principals and teachers in accordance with state standards.</p> <p>Documented evidence (reports) private schools meet required standards regarding sanitation and public safety.</p>	<p>Partial Compliance</p> <p>All schools within the State of Pohnpei were provided with the Curriculum Framework developed by the Department of Education ensuring there was consistency with curriculum standards.</p> <p>Evidence of teachers and Principals having the necessary qualifications was found in one of the private schools documentation; however other schools reports did not provide the necessary information.</p> <p>Private schools are regarded to have equal if not better standards than the states schools with regard to sanitation and public safety areas.</p>
109.	Pohnpei State Code of Law Education Act 1999 Title V § 5-2	No person or group of persons may operate a private school within the jurisdiction of the state of Pohnpei without first obtaining a permit.	Copies of permits for private schools operating within the Pohnpei jurisdiction	<p>Compliance</p> <p>Documented evidence and discussions with the Director of Education indicated that all private schools within Pohnpei State have obtained the required permit.</p>
110.	Pohnpei State Code of Law Education Act Title V § 5-4	Private schools shall submit an annual report to the Department in a form established by the Department. Failure to comply with this requirement shall constitute an offense punishable by a fine of not more than \$100 for each offence.	<p>Examples of three (3) annual reports from different private schools.</p> <p>If reports not submitted in appropriate timeframe than evidence of fine being administered and enforced.</p>	<p>Non-Compliance</p> <p>No regular or formalized oversight is provided by DOE of the Private School in Pohnpei State.</p> <p>Reports are furnished by the private schools, however the information provided in these reports is limited to the number of students enrolled. It does not provided information on maintenance, construction, absenteeism by students, teachers,</p>

				teacher, principal qualifications, expenditure of Department allocated budget, parent involvement in school activities or any other necessary information that may be required by the Director to ensure the school is operating as a Public School would be.
	Hiring of Special Instructors			
111.	Policy and Procedures are currently under review and are old programs.	The Administrator recommends a person for special instructor for the traditional life skills program programs in the following manner: 1. Describe the program and needed skills. 2. Describe the applicant's skills and background. 3. Provides content of the program to be taught 4. Describe the manner of instruction. 5. Length of the course/program. 6. Estimate cost of program.	Process for selection of persons for special cultural heritage and traditional skills program.	Partial Compliance Currently Policies and Procedures for the hiring of Special Instructors as in the case of Traditional Life Skill Instructors. For the Traditional Life Skill Program are old policies from another program. Currently there are 9 instructors with contracted with another 2 contracts pending. 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 criterion have been fulfilled.
112.	Pohnpei Public Service System Regulations Part 3 Section 3.12	When Administrator of WD & ST has sufficiency to recommend the person to the Department of Personnel. The requirement of the PSS 'Hiring of Contract Employee' is enforced.	Position Descriptions are attached to request for personnel actions, signatures from all necessary persons is obtained. Office of Human Resources prepares Personnel Action.	Partial Compliance Currently there is no position descriptions developed for the Traditional Life Skills instructor jobs. However, all other PSS regulatory requirements are followed
113.	Policy and Procedures are currently under review and are old programs.	These shall be submitted to the State Director of Education and Administrator for final approval.	Approved personnel action forms are returned to Director and Administrator of WD & ST for approval.	Partial Compliance Without full position descriptions comparison to instructor's application can not be fully made and therefore it is only on the documents provided that decisions are made.
114.	Pohnpei State Law 6L-83-06 The Pohnpei Language Commission	Experts, consultants, and professionals may be employed or contracted as the Commission	Process for selection of persons deemed necessary.	Non Compliance The Language Commission has not been established at this time. The Governor

	§ 2 (2) (c)	deems appropriate and as the budget and annual appropriations may allow.	Documentation of any persons engaged to undertake work in program.	has not appointed any person or established a budget.
Fiscal Planning and Accounting Systems				
115.	Pohnpei State Code of Law Title 11 Chapter 10 § 10-103	There is hereby authorized for appropriation from the general fund of Pohnpei and such funds in the Pohnpei Treasury into which Compact § 221 (b) monies are deposited a sum or sums to be determined annually	Evidence of monies appropriated from the general fund and compact funds are determined annually on budgetary requirements.	Partial Compliance Money is made available for the DOE to implement its education program within the schools within Pohnpei State. Funds are determined annually and deposited on that determination, in accordance with budgetary obligation. The budget is not always approved as submitted. Legislative changes are made that alter the intent of the budget.
116.	Financial Management Regulations Part 6	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.	Development of a tentative budget for the next fiscal year. Board of Education to Review prior to submission to the Governor. Last draft budget reports produced	Compliance While no documented policy exists, the State Department of Finance specified the budgetary submission process. Draft budgets are prepared in strict compliance with the State Department of Finance requirements
117.	Financial Management Regulations Part 6	The State Director of Education and/or his/her designee shall have full and final authority for control	Accountability measures established and documented	Partial Compliance The Director does have responsibility over the budget and final control on

		of the budget as authorized by the Governor and the State Board of Education. Designee: Budget and Supply		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.
118.	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 reviews	Partial Compliance The budgetary officer appears to be the only person to produce expenditure sheets for review. This can allow for discrepancies to occur between the various stakeholders of records retained. There would be greater benefit from implementing an oversight that involved all stakeholders on budgetary and expense issues. Before final review is conducted by the Director. Externally, the Department of Finance exercises a further review.
119.	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	Partial Compliance Budgetary and expense records are maintained by the DOE. However, records are maintained and retained by other DOE stakeholders relating to their specific tasks. For example, the Property and Procurement Officer maintains expenditure information necessary for purchasing. However, there appears to be no linkages between the various record holders and the budgetary officer. This allows for variations to 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.
120.	No documented policy	The State Educational Budget Office will at a minimum perform the following: <ol style="list-style-type: none"> 1. Record every financial transaction. 2. Record all monies received as to: <ol style="list-style-type: none"> a. Type b. Source 3. Record all monies expended as to: <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> 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 criterion. While there is some ad hoc reporting to the Director, it is acknowledged there is no established reporting system in place informing Director on budget relevant issues. For this reason only, this criterion is assess as partial compliance
121.	No documented policy	The State Director of Education shall designate department heads and other such personnel as necessary as having budgetary responsibility.	Roles of persons 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			
122.	Pohnpei State Code of Law Education Act Title 2 Part 2 § 2-5 (5)	Duties and functions of the Board. Assisting the Director in recruiting and hiring key personnel.	Procedures followed in last three (3) recruitments.	Non Compliance The Board has provided no assistance to the director in the process of recruiting and hiring key personnel. This is due to the Board not sitting since August 2008. There is a new Board of Education sworn in May 2010 and it will be their responsibility to ensure hiring policy is followed in accordance with legislation.
123.	Pohnpei State Code of Law Education Act Title 2 Part 3 § 2-6 (6)	Hire, certify, and evaluate department personnel, in coordination with the Division of Personnel, Labor and Manpower Development.	Demonstrated cooperation in the development of procedures followed in hiring, certifying and evaluating department personnel.	Partial Compliance The only area where policy is followed in coordination with the Division of Personnel, Labor and Manpower is to certify. Persons applying for positions with the DOE are not evaluated in accordance with policy guidelines nor is there any input from the Board of Education.
124.	Public Service System Regulations Part 2 § 2-1	Based on the needs of the Government, the State Personnel Officer, shall administer recruitment programs designed to attract fully qualified applicants to the Public Service System. Examinations shall be practical and reasonable and shall provide for ascertaining the qualification of applicants and their relative capacity and fitness for the proper performance of duties in the class	Documentation of last three (3) exams administered to applicants for positions with the Department of Education.	Non Compliance No evidence existed that examinations were administered to applicants for positions within the Department of Education. Further, there was no evidence that applicants had to show capacity and fitness for the proper performance of duties in the class of position they were applying

		of position for which they are applying.		
125.	Public Service System Regulations Part 2 § 2-2	All positions shall be recruited by advertisement for an ample period of time and will include the following information: a. job title b. pay level c. duties d. education or skills needed e. where to apply f. last date to apply	Examples of last three (3) advertised announcements with required information.	Compliance Department of Personnel post advertisements doe positions for the required 30 day period with all the specified information and in accordance with the Public Service System Regulations.
Personnel Performance Evaluation				
126.	Pohnpei Code of Law Division 1 Public Officers and Employees Title 9 Chapter 2 § 2-130	The Director shall develop and maintain a system of performance evaluation for the purpose of appraising the productivity of employees in the public service. Each agency shall develop performance evaluation criteria for every class or, if appropriate, for individual positions and shall rate each employee under its jurisdiction at least once a year.	Examples of personnel evaluation forms for every class or individual positions.	Partial Compliance Observation of undertaken of teachers by principals and specialists within the classroom environment. This is undertaken at least once a year or if time permitting twice a year. The IOTA form is used by all principals to ensure consistency in all schools and pre and post meetings are undertaking prior to the observations taking place. However there is no evidence of any performance evaluation being undertaken on other staff members with in the DOE which allows for feedback of work performance and the ability to improve on job skills, abilities, and attitudes.
127.	Pohnpei State Code of Law Education Act 1999 Part 3 § 6	Hire, certify, and evaluate department personnel, in coordination with the Division of Personnel, Labor and Manpower Development	Personnel evaluation reports for 3 employees from each DOE division or unit.	Partial Compliance There was evidence during the audit that the DOE undertakes to have the Department of Personnel certify that appropriate candidates are made available to DOE for consideration in hiring. However there was no evidence that evaluation is done on any other

				employee of DOE other than teachers.
128.	Public Service System Regulations Part 8 § 8.2	The performance evaluation program is primarily designed to measure how well employees are discharging their duties and responsibilities, to recognize employees who are doing outstanding work, and to highlight areas needing improvement.	Personnel evaluation reports for 3 employees from each DOE division or unit.	Non-Compliance While there is a standardized performance evaluation form used for appraising teacher's ability in class room delivery, the form does not indicate areas of knowledge and skill development. There were no employee forms which neither gave stands within the organization nor highlighted areas requiring improvement.
129.	Public Service System Regulations Part 8 § 8.3	All employees and their supervisors shall periodically evaluate the employees' success in meeting critical employment elements and other established performance requirements. Every permanent and probationary employee shall periodically receive written performance evaluations including the determination of the employee's performance standard.	Personnel evaluation reports for 3 employees from each DOE division or unit.	Partial Compliance This performance criterion is obtaining partial compliance due to the teachers being observed using the IOTA form. This form gives a written (however limited) performance evaluation which determines the employees performance standard. However, there is no such form or any performance evaluation for other staff members of DOE available which evaluates employee's performance standards.
130.	Public Service System Regulations Part 8 § 8.4	Each supervisor shall personally meet with the employees under his/her supervision to periodically review the objectives of the job, the expected standards of performance and the means for achieving them. These reviews shall include the identification and/or review of the critical performance elements of the employee's position.	Personnel evaluation reports for 3 employees from each DOE division or unit.	Non-Compliance Other than the observations of teachers it was found during the audit at no time was any staff member met by their respective supervisor and a review or appraisal conducted of their job requirements. A schedule needs to be developed by supervisors of their subordinates to ensure this performance review takes place and that all staff is aware of their roles, responsibilities and positions within DOE.
131.	Public Service System Regulations	Every supervisor shall meet personally with the employees	Demonstrated establishment of critical performance elements of	Non-Compliance Other than the observations of teachers

	Part 8 § 8.5	under his/her supervision to establish the critical performance elements of the employee's position. These critical performance elements shall be identified by applying guidelines set by the Office of Human Resources. Generally, the critical performance elements are those duties and responsibilities that are so critical to the position as to necessitate the termination of an employee if he/she fails to perform them.	employee's position. Personnel evaluation reports for 3 employees from each DOE division or unit.	it was found during the audit at no time was any staff member met by their respective supervisor and a review or appraisal conducted of their job requirements. A schedule needs to be developed by supervisors of subordinates to ensure this performance review takes place and that all staff is aware of their roles and positions within DOE. Due to the lack of performance appraisals being undertaken it makes it impossible for the Director to administer terminations or any other disciplinary action against staff member.
132.	Public Service System Regulations Part 8 § 8.6	<p>The following performance standards shall apply to the performance evaluation program and the performance evaluation reports:</p> <p>'Outstanding' performance is awarded when performance significantly exceeds satisfactory performance standards and is truly exceptional.</p> <p>'Satisfactory' performance is awarded when the performance adequately meets the job's performance requirements.</p> <p>'Marginally Satisfactory' performance is awarded when the performance is barely acceptable and improvement is needed. An employee shall receive a marginally satisfactory performance standard if one or more of the critical performance elements is rated M.</p>	Annual written performance ratings for the last three years for a selected three employees from each DOE division or unit showing use of performance standards.	Non-Compliance No documentation was evident that demonstrated that performance standards were applied. Or annual written performance ratings were applied to staff members. .

		'Unsatisfactory' performance is awarded when the performance fails to meet even the marginally satisfactory standard. The work is unacceptable and improvement is unlikely.		
133.	Public Service System Regulations Part 8 § 8.7	Each supervisor shall prepare a performance evaluation report for each employee under his/her supervision. The reports shall be based on the periodic reviews and the evaluation of the employee's performance standards. The report shall be in the form prescribed by the Office of Human Resources.	Annual written performance ratings for the last three years for a selected three employees from each DOE division or unit.	Non-Compliance No evidence of reports were provided showing that Supervisors had conducted performance evaluations and prepared a report in the format prescribed by the Office of Human Resources were produced that indicated any ranking of staff members
Penalty Sanctions				
134.	Pohnpei State Code of Law Division 1, Title 9 Public Officers and Employees Chapter 2 § 2-138	Disciplinary action: suspension. A management official may, for disciplinary purposes, suspend any employee without pay for such length of time as he considers appropriate. No single suspension for a period of more than three working days, whether consecutive or not, shall take effect until the management official transmits to the employee, by the most practical means, a written notice setting forth the specific reasons for the suspension and the employee's rights of appeal. A copy of the notice shall be filed with the Director without delay. With the approval of the Director, an employee may be suspended for a period longer than 30 days pending	Last three reports of disciplinary action, showing disciplinary action where suspension was implemented and procedures as outline followed.	Compliance Documented evidence was obtained that written suspense was provided to two staff members for periods of 15 days. These letters were provided forth with to the relevant staff members and copies attached to their personnel files. These letters were written after an investigation was undertaken by the Director.

		the investigation of any charge against him. When an employee has been suspended pending such an investigation and the charge is subsequently dropped, he shall be reinstated in his position with full pay and benefits retroactive to the date of suspension.		
135.	Pohnpei State Code of Law Division 1, Title 9 Public Officers and Employees Chapter 2 § 2-139	Disciplinary action: dismissal; demotion. A management official may, for disciplinary reasons, dismiss or demote an employee for such causes that will promote the efficiency of the public service. Demotions may also be made for reasons other than disciplinary ones. The personnel regulations shall specify the circumstances in which such demotions may be authorized. No dismissal or demotion of a permanent employee shall be effective for any purpose until the management official transmits to the employee, by the most practical means, a written notice setting forth the specific reasons for the dismissal or demotion and the employee's rights of appeal. A copy of the notice shall be filed with the Director without delay.	Last three reports of disciplinary action, showing disciplinary action where dismissal was implemented and procedures as outline followed.	This criterion could not be assessed. There was no evidence that any staff member had been terminated from the employment of DOE in recent years. It is felt by the auditor that the Director would however follow all policies as outlined if this action was deemed necessary.
136.	Pohnpei Department of Education School Policy Policy 120.4 (a)	Any teacher, staff member or other school personnel who violates this policy shall be subject to adverse action under the applicable Personnel Rules and Regulations. Personnel Polices and Alcoholism and Problem Drinking may also be applied.	Copies of last three adverse actions taken under the applicable Personnel Rules and Regulations.	This criterion could not be assessed. There was no evidence that any staff member had been terminated from the employment of DOE in recent years. It is felt by the auditor that the Director would however follow all policies as outlined if this action was deemed necessary.

137.	Pohnpei Department of Education School Policy Policy 120.4 (b)	Possession and use of illegal drugs and other controlled substances by a teacher, staff and other school personnel shall be referred to the Law Enforcement Agency.	Last three reports submitted to Law Enforcement Agency regarding DOE personnel and possession of illegal drugs or other controlled substances. (If knowledge and report made).	This criterion could not be assessed. There was no evidence that any staff member had been terminated from the employment of DOE in recent years. It is felt by the auditor that the Director would however follow all policies as outlined if this action was deemed necessary.
School Administration Policy and Procedures				
138.	Pohnpei State Code of Law Education Act 1999 Part 3 § (7)	The Director shall be responsible for physical facilities planning, construction and maintenance.	DOE annual report on School Administration relating to construction and maintenance.	Partial Compliance There was evidence of construction work taking place at some schools with maintenance. However this was not consistent within the DOE. Most schools required some maintenance work to either classrooms or other necessary facilities (e.g. bathrooms, water supply).
139.	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 criterion. Most school buildings and facilities are maintained to the best possible level by Principals. While staffs 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				
140.	Pohnpei State Code of Law Education Act 1999 Part 4 § 2-7	(b) Each public primary school shall have at least one teacher assigned thereto and no school	Pohnpei State Code of Law Education Act 1999 Part 4	Compliance It was noted during the audit that all schools meet the legislative

		shall have less than three grades, first through third.	§ 2-7	requirements relating to schools having no less than three grades, and one teacher assigned.
141.	Pohnpei State Code of Law Education Act 1999 Title IV Part 1 § 4-4	Sabbatical Leave. In addition to such leave as maybe authorized generally under the Public Service System, the Department may grant a sabbatical leave of absence to any teacher.	Pohnpei State Code of Law Education Act 1999 Title IV Part 1 § 4-4	Partial Compliance During the course of the audit it was found that sabbatical leave was granted by one principal for teachers to further their studies.
142.	Pohnpei State Public Service System Regulations	The provisions of the PSS are complied with relating to leave, assignment, transfer and paid positions	Data and records on leave, assignments, transfers and paid positions	Partial Compliance Data was produced showing current assignments of personnel. Other documented evidence was obtained that show the provision of the Public Service System in relation to transfers, leave and paid positions is being complied with. However, some requests for increases from one pay level to another are not done in a timely manner.
143.	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, it was found that transfers where undertaken in the best interest of all parties that is the teachers and distance travelled and the needs of the school. However, no documented evidence to support was produced.
Supplies, Equipment and Vehicles				
144.	Pohnpei State Code of Law Education Act 1999 Title II Part 3 § 2-6	The executive functions of the Department of education shall be vested in the Director of Education who shall: (9) Review and evaluate textbooks and materials before purchase in order to determine their suitability as may be consistent with the established curricula	Suitable text books have been purchased which are consistent with established curricula.	Partial Compliance Textbooks purchased were reviewed and evaluated to ensure they were suitable and consistent with established curricula, however instructional tools provided in some of the textbooks are unable to be utilized to their full extent as there is no DOE equipment or resources to implement the tools.

<p>145.</p>	<p>State Department of Education Procurement 5-year Plan</p>	<p>There shall be a formal assessment on existing textbooks in all schools that will determine the number and conditions of these textbooks by June of every year.</p> <p>Chief of Secondary Education, High School Principals, Department Chairpersons and Education Specialists with the District Supervisors must work together to complete textbook assessment for all high schools and present a written report to the Textbook Accountability Committee.</p> <p>Chief of Elementary, District Supervisors and Core subject Specialists must work with Elementary School Principals and their respective teachers in completing the assessment of the textbooks and present a written report to the Textbook Accountability Committee.</p> <p>Based on the assessment, Textbook Accountability Committee will formulate criteria for purchasing of textbooks or textbook needs.</p> <p>The Textbook Accountability Committee must also be present during selection of vendor and stay in touch with the selected vendor until actual arrival of textbooks.</p>	<p>Three written assessments of existing textbooks utilized within schools determining number, condition of books.</p> <p>Three written reports with required information presented to the Textbook Accountability Committee demonstrating input from all relevant supervisors and specialists.</p> <p>Process for selecting appropriate vendor and ensuring textbooks arrive.</p>	<p>Partial Compliance</p> <p>There was no documented evidence provided during the audit determining the condition and number of textbooks each year, no written report was provided showing textbook assessment for high schools being presented to the Textbook Accountability Committee.</p> <p>Textbooks were selected on criteria established ensuring the books meet the needs of curriculum.</p>
<p>146.</p>	<p>State Department of Education Procurement 5-year Plan</p>	<p>All supplies are to be purchased in accordance with the purchasing cycle as set out in the five year plan</p>	<p>Evidence of textbooks purchased and being utilized in schools.</p>	<p>Partial Compliance</p> <p>During the audit it was observed that some books have not been introduced</p>

		and textbooks are being utilized in schools.		into the classroom environment. As books were still in their boxes, or had not been delivered to the schools.
147.	State Department of Education Procurement 5-year Plan	Textbook Adoption Committee. Teachers, Parents and Administrators compose this committee. The coordinators and teachers on this committee are selected to represent the subject areas of the textbooks up for adoption. The purpose of this committee is to review and assure that textbooks to be adopted conform and align with the Pohnpei State Curriculum Framework and Policies.	Evidence of input by the Textbook Adoption Committee in reviewing books for adoption to ensure alliance with Pohnpei Curriculum Framework.	Non-Compliance There was no evidence that the committee coordinated, reviewed and assured that textbooks to be adopted conformed to the Pohnpei State Curriculum Framework and Policies. The textbooks being used in schools do met with the curriculum framework in some areas, but this was not done through the coordination process.
148.	Financial Management Regulations Part 6	The DOE Administration through Budget and supply shall coordinate the purchase of all supplies and equipment in State programs.	Processes established	Compliance Evidence was obtained during the audit that three quotes are obtained and purchase requests are submitted to the purchase officer, who submits purchase requisitions.
149.	Financial Management Regulations Section 6	All property will be identified by affixing a property tag	Extent of tagging of property	Compliance During the audit it was observed that assets tagged with the specified government property tag.
150.	No documented policy	DOE will conduct annual 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.	List of inventory list with ID numbers Inventory List with Principal of each school.	Partial Compliance A detailed inventory list was provided to the auditor by the Compliance and Supply Officer for the DOE. This list provides all the necessary information on the property item as outlined in the requirements of the Department. On requests to the Principals of schools visited, no Principal was able to produce a list of their own property held at the school. Each principal relays

		Inventories will be scheduled by the State Director of Education		<p>on the property list held at Central Office.</p> <p>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</p>
151.	Financial Management Regulations Section 6	The Director shall maintain current fixed asset lists.	Established list	<p>Partial Compliance</p> <p>An extensive list of fixed assets is maintained, however, this list is not accurate as some items are missing from the list. (11 computers).</p>
152.	Financial Management Regulations Section 6	A physical inventory should be conducted at the end of every school year.	Inventory Reports	<p>Partial Compliance</p> <p>During the audit it was noted that not all schools had had a physical inventory of their assets conducted in a school year.</p> <p>It was noted during audits that schools are not conducting their own asset inventory if one is not conducted by the Property and Procurement Officer ensuring all property is present.</p>
Food Services				
153.	Pohnpei State Code of Law Education Act 1999 Title IV Part 5 § 4-18	School lunch program. There shall be a school lunch program under which school lunches shall be made available without cost to every student in every secondary school where students are on campus for two hours or more prior to noon, and, for two hours, or more after noon; PROVIDED that the department may extend the school	Evidence of a food program within the Secondary and Primary schools.	No currently implemented therefore cannot be determined

		lunch program to the primary schools of the state in similar situations upon a finding of sufficient monies and other resources to carry out the program at the primary level.		
154.	Pohnpei State Code of Law Education Act 1999 Title IV Part 5 § 4-19	(1) The Department shall provide in its annual budget submission a separate item for the financing of the school lunch program which shall describe in detail, the costs involved and the extent and level of service to be provided.	Annual budget submitted with separate item for school lunch program.	No currently implemented therefore cannot be determined
155.	Pohnpei State Code of Law Education Act 1999 Title IV Part 5 § 4-19	(3) The Director, in conjunction with the Governor, shall submit an annual report to the Legislator on or before October 15 detailing all financial activities of the school lunch program for the preceding fiscal year.	Three annual reports submitted to the Legislator.	No currently implemented therefore cannot be determined
156.	Pohnpei State Code of Law Education Act 1999 Title IV Part 5 § 4-20	The Department shall provide room and board without cost to students domiciled in the outer islands of the state and in such other remote areas as may be prescribed by the Board of Education, for attendance at the public secondary schools for the state.	Evidence of provisions of room and board provided to outer island students without cost.	No currently implemented therefore cannot be determined
157.	Pohnpei State Code of Law Education Act 1999 Title IV Part 5 § 4-21	The Director may appoint a trained and experienced nutritionist to create healthful, appropriate menus for the school lunch program and for meals for dormitory students, provide advice to food service employees, and speak to students on nutrition.	Documentation of evidence of nutritionist assisting with creation of healthy meals for both boarding and day students.	No currently implemented therefore cannot be determined

Attachment Two – List of Education Personnel interviewed

Name		Position
Joseph VILLAZON	Regularly	Director
Reynold ALBERT	Regularly	Chief Curriculum
Kariner ANSON	Regularly	DOE Administration Office
Martha HALBERT	Regularly	DOE Administration
Ketchem HARRY		Supply Technician
Jeanette HELLAN		Testing Unit
Maria DONRE		Education Specialist
Charles EDWIN		Education Specialist
Ander JOSEPH		Training Coordinator
Sirieka KALLOP		Scholarship Coordinator
Emrick LEBEHN		Chief ECE
Kadalino DAMARLANE		Administrator WD & ST
Isdara EZEKIAS		Federal Program Coordinator WD & ST
MariaLynda PERMAN		Federal Program Coordinator WD & ST
Carlihna HENRY		Acting Chief SPED
Susaia YOURIDA		Data Base Specialist
Margret OLIVER		Physical Therapist
Jessie SOLOMON		Education Specialist
Jimmy ELDRIGE		Education Specialist
Peter VALENTE 20		World Teach
Taylor STANTON		World Teach
Celeste VISSER		World Teach
Tony AZIOS		World Teach
Lucas		World Teach
Pelsin CHARLEY	Regularly	Project Coordinator SIP Program
Schools	Temwen Elementary	
Ansber FREDRICK		Classroom Teacher
Elcid JOSEPH		Principal
Yvonne GALLEN		Classroom Teacher
Roleen JOHNNY		Resource Teacher

Rolenster JOHNNY		Classroom Teacher
School	A wak Elementary	
Peter RAMIREZ		Acting Principal
Beamina SOSW		Classroom Teacher
Jeffrey ARON		Classroom Teacher
Mary KILMETE		Classroom Teacher
Senita ALFRED		Classroom Teacher
Rafalia OBISPO		Cook / ECE
Maureen VILLAGOMEZ		SPEC Teacher
Meranda AMOR		Classroom Teacher
Merlina DORNE		Classroom Teacher
Nayleen RAMIREZ 40		Classroom Teacher
Judy KOSTKA		Classroom Teacher
Lolihna LADORE		Classroom Teacher
Mayuleen EDGAR		Teacher Aide
Peter PRIMO		Classroom Teacher
School	Sekere Elementary	
Pelma AGRIPPA		Classroom Teacher
Everashia HELTER		Classroom Teacher
Julie ELIAM		Classroom Teacher
Josepha BERNARD		Classroom Teacher
Lilyena ZARRED		Classroom Teacher
Lepty HERRY		Classroom Teacher
Herder EDER		Classroom Teacher
Martin LOYOLA		Librarian
Perez AMARAICH		ECE Teacher Aid
Pius SIDEN		Classroom Teacher
Synthia SAIMON		Acting Principal
Mitaro SIMINA		Classroom Teacher
School	RSP Elementary	
Dickson BEN		Classroom Teacher
Isipel RAYEL		Classroom Teacher
Hermina WARREN		Classroom Teacher
Aliynda GOHN 60		Resource Teacher

Romona ROBY		Classroom Teacher
Dakiko BILLY		Classroom Teacher
Poorly SETILE		Classroom Teacher
Teliwy LIWY		Principial
School	Rohi Elementary	
Alice MANUEL		Classroom Teacher
Mikalia ALFONS		Classroom Teacher
Felicidad YENNERES		Classroom Teacher
Heldina ALFONS		Classroom Teacher
Manwelida SPENCER		Classroom Teacher
Sepe UNE		Classroom Teacher
Lucia ALFONS		Classroom Teacher
Cecila MARTIN		Principal
Emihno TIHPEN		Classroom Teacher
Carmelina KERMAN		Classroom Teacher
Percaleen MAURICIO		Resource Teacher
School	Lukop Elementary	
Mollie WRIGHT		Peace Corps Volunteer
Sihter KALIO		Classroom Teacher
Elizabeth SORAM		Classroom Teacher
Rita SORAM		Classroom Teacher
Wayner ELIAS 80		Classroom Teacher
Waltin HARRY		Classroom Teacher
Sakisy MAX		Classroom Teacher
Hickerson KADO		Classroom Teacher
Wailer OLTER		Principal
School	Enipein Elementary	
Welly MOYA		Principal Teacher
Evenger WALTU		Classroom Teacher
Emy-Rose GILETE		Classroom Teacher
Welson NETH		Classroom Teacher
Kalistos NETH		Classroom Teacher
Jayleen PAULUS		Classroom Teacher
Berlinda WALTU		Resource Teacher

Abraham EPERIAM		Classroom Teacher
Tony SARAPIO		Classroom Teacher
Marleen SANTOS		Teacher Aid
Kathy Catalina LISUA		Teacher Aid
School	Pohnlongas Elementary	
Mary MUDONG		Principal Teacher
Evangileen FREDRICK		Classroom Teacher
Karmerihna SANTIAGO		Classroom Teacher
Shra RINGLEN		Classroom Teacher
Sweelynn JOHNNY 100		Resource Teacher
Julita ETSE		Classroom Teacher
John RINGLEN		Classroom Teacher
Newton ROBERT		Classroom Teacher
Matt BRITTEN		Peach Corps Volunteer Teacher
School	Sokehs Powe Elementary	
Rose SANTOS		Classroom Teacher
Rosemary LORRIN		Classroom Teacher
Clanry CAPELLE		Classroom Teacher
Andrea ISAAC		Classroom Teacher
Leilani ILAI		Classroom Teacher
Alexandra DIOPULOS		Classroom Teacher
Burton ELIAM		Resource Teacher
Benerihna JOHN		Classroom Teacher
Relynn ALEX		Classroom Teacher
Rita LEBEHN		Classroom Teacher
Morthy SOLOMON		Classroom Teacher
Darlinton LEBEHN		Acting Principal
Anger LEBEHN		Classroom Teacher
School	Nett Elementary	
Primo LOYOLA		Acting Principal
Maxson MALLARME		Acting Vice Principal
Janalyne AIDEL 120		Classroom Teacher
Melainy PANAPA		Recourse Teacher (SPED)
Elwihter SAHM		Classroom Teacher

Elina WILSON		Classroom Teacher
Mihter WENDLIN		Teacher Aid
Anderson PONAPARD		Classroom Teacher
Nelson DAMARLANE		Classroom Teacher
Mark LIGOLUR		Classroom Teacher
Maria BERAN		Classroom Teacher
Kelly KOIKE		Classroom Teacher
Jenson WENDOLIN		Classroom Teacher
Jalenster DAVID		Classroom Teacher
Ioanis SANTOS		Teacher Aid
Altrickson LIKOR		Classroom Teacher
Amerida LAWRENCE		Classroom Teacher
Henerigo DADIUS		Classroom Teacher
Joe EHRAM		Classroom Teacher
Jahnnyber HAIRENS		Classroom Teacher
Franciso IFAMILIK		Classroom Teacher
Dagger SOULIK		Classroom Teacher
Alex PONAPART 140		Classroom Teacher
Mark LIGOHR		Classroom Teacher
Ilden IOANIS		Resource Teacher
Cartwright XAVIER		Classroom Teacher
David HETIBACK		Classroom Teacher
Dennis ROSARIO		Classroom Teacher
Maxon LOYOLA		Classroom Teacher
Arsenio WILSON		Classroom Teacher
Lesley ROBERT		Classroom Teacher
Laurette ROSARIO		Classroom Teacher
Docelyn EDGAR		Classroom Teacher
Lorina SUSAI		Classroom Teacher
Merleen AUGUSTINE		Classroom Teacher
Brigida IRIARTE		Classroom Teacher
Nelson DAMARLANE		Classroom Teacher
Glorina RODRIQUEZ		Classroom Teacher
School	Pehleng	

Niceleen PETER		Classroom Teacher
Merlyn HAINRICK		Classroom Teacher
Karleen DAVID		Classroom Teacher
Josephina HAINRICK		Classroom Teacher
Richard EDWARD 160		Classroom Teacher
Carleen HAINRICK		Classroom Teacher
Gary SPENCER		Classroom Teacher
Angelihter FREDRICK		Classroom Teacher
Jason BARNABAS		Classroom Teacher
Redson JULIOS		Classroom Teacher
Alter FREDRICK		Classroom Teacher
George BARNABAS		Principal
Derickson DANIEL		Teacher Aid
School	PICs	
Derson JOSEPH		Counselor
Denio FRANK		General Business (Chairperson)
Sonster EDGAR		Geometry / Math (Chairperson)
Duhlen SOUMWIE		Agriculture / World History (Chairperson)
John NABLO		Physical Education (Chairperson)
Adlihna LEBEHN		Education (Chairperson)
Carolyn FREDRICK		Counselor
Antolin GOMEZ		Counselor
Youber JOSSIEN		Agri Science (Chairperson)
Borauea NEEMIA		Social Studies (Chairperson)
Diopulos PERNIS		Principal
Norbert RODRIGUEZ 180		Vice Principal
Rainer JOHNNY		PTA / Board of Education
Father Nick SOPEPA		Calvary International College
Offices Visited		
Attorney General Office		
Budget and Finance Office		
Personnel Office		

Attachment Three – List of documents reviewed

Document
Public Service System Regulations
Pohnpei Code of Law
Pohnpei Education Act 1999
The Digital Code of the State of Pohnpei Education 2006
Organizational Chart DOE
Organizational Chart ECE
Pohnpei DOE Strategic Plan 2008 - 2012
Pohnpei DOE Plan SY 09-10 Electronic Power Point
Pohnpei State Special Education Focused Monitoring Report – October 5 2009
Student Profile for Special Education 2009-2010
Pohnpei DOE proposed Teacher Evaluation System Information Sheet
Special Education Procedures Manual
2008-2009 summary data – Electronic -
Student enrolment 2005-2006 Elementary - Secondary
Student enrolment 2006-2007 Elementary - Secondary
Student enrolment 2007-2008 Elementary - Secondary
Student enrolment 2008-2009 Elementary - Secondary
Student enrolment 2009-2010 Elementary - Secondary
Staff listing profiles - electronic
School asset inventory
Pohnpei Budget FY09
Pohnpei Budget FY10
Pohnpei Budget FY06
Scholarship Loan Fund application
Scholarship, Grant and Loan Fund Regulations
Scholarship Awardees status lists 2009-2010
Pohnpei SEG Integrated Budget 06

Pohnpei DOE Fiscal Budget 09
Pohnpei DOE Proposed Budget FY2011
List of World Teach volunteers
PRS09 Reports
The Digital Code of the State of Pohnpei Public Officers and Employees 2006
Pohnpei State Language Arts Standards Grades k 1 to 12
Pohnpei State Writing Standards Grades k 1 to 12
Pohnpei State Oral and Visual Communication Standards Grades k 1 to 12
Pohnpei State Social Studies Standards Grades k 1 to 12
Pohnpei State Culture Standards Grades k 1 to 12
Pohnpei State Geography Standards Grades k 1 to 12
Pohnpei State History Standards Grades k 1 to 12
Pohnpei State Economics Standards Grades k 1 to 12
Pohnpei State Civics Standards Grades k 1 to 12
Pohnpei State Mathematics Standards Grades k 1 to 12
Pohnpei State Number, Operation and Computation Standards Grades k 1 to 12
Pohnpei State Geometry, Measurement, Transformation Standards Grades k 1 to 12
Pohnpei State Patterns and Algebra Standards Grades K 1 to 12
Pohnpei State Statistics and Probability Standards Grades K 1 to 12
Pohnpei State Science Standards Grades K 1 to 12
Pohnpei State Science as Inquiry Grade K 1 to 12
Pohnpei State Physical Science and Technology Grades K 1 to 12
Pohnpei State Earth and Space Grades K 1 to 12
Pohnpei State Life and Environmental Science Grades K 1 to 12
Pohnpei State Marine Science Grades K 1 to 12
Assessment Guidelines for Teachers
Principals for Assessment and Evaluation
DOE Lesson Plan Format
Instrument for the Observation of Teaching Activities (IOTA) Form
PICs High School Staff Attendance Report
Pohnpei Supplemental Education Grant FY 2006 Grant Proposal August 2006

Pohnpei Supplemental Education Grant FY 2006 Grant Proposal Dec 2006
Performance Budget Summary 2007
Class Specification for Classroom Teachers, Counsellors and Principals
Class Specifications for Clerk Typist
Class Specification school secretary
Class Specification for Education Specialist – curriculum
Class Specification for Administration Officer
Job Description for Administrator Facilities and Support Services
JEMCO 20 indicators spread sheet - electronic
EMIS Data – electronic – for FSM National
Random – School Improvement Plans (SIP)
Annual Textbook Inventory Form
Statistical Yearbook Federates States of Micronesia 2008
Pohnpei DOE Five Year Textbook Procurement Plan 2006-2010
Equipment Accountability Distribution Form
Textbook Policy / Contract Form
Textbook Accountability Distribution Form
Instructional Material Issues and Accepted Form
Guidelines for State Testing
Tables – PHET (1995-2009) NST (2007-2008) COMET (2009)
FSM National Testing Guidelines
Testing Summary Report School Year 2002-2003
Pohnpei DOE EDMS Print outs
Pohnpei State DOE Policies and Procedures
Teacher qualifications and school allocations
Sped LPP for 2008-2009
SPED Child Count Tables 03-04-06-07-09
Fund Available Report SPED 2007, 2009
SPED Program Enrolment 2009-2010
Students with disabilities – State Assessments 2009
November 2008, T3 Report Status

Example of Fixed Asset sheet 2009
Example of Property Listing sheet
WD & ST Apprenticeship Program PRIDE Traditional Life Skills
School inventory List – Electronic -2009 covering Desks, Sports equipment, cabinets, fans, fixed assets, buildings
2007-2008 & 2008-2009 FSM IDEA Part APR / SPP: National and State Data
COMET Admission Examination Statistical Summaries 2010
WASC Visiting Committee Report
Sixth Pohnpei Legislature 2006 Establishment of Language Commission
The Digital Code of the State of Pohnpei 2006 Public Finance and Procurement
Pohnpei State Department of Education Teachers Forum Report 'Learn to Teach and Teach to Learn' January 2010
SPED Procedural Manual 2005
SPED Monitoring Report 2000
SPED Annual Performance Report and Improvement Plan 2004
Pohnpei DOE Annual Report SY01-02
Pre-Test 4 th Grade SY 08-09 Language Arts and Mathematics
Standards-Based Reading Scoring Manual Grade 11 08
Pohnpei High School Entrance Test 2008
NSTT Science
Standards-Based Reading Test Scoring Manual Grade 5 2008
Standards-Based Reading Test Scoring Manual Grade 3 2008
Standards-Based Reading Test Scoring Manual Grade 9 2008
Standards-Based Reading Test Scoring Manual Grade 10 2008
Standards-Based Reading Test Scoring Manual Grade 8 2008-2009
Standards-Based Reading Test Scoring Manual Grade 7 2008
Standards-Based Reading Test Scoring Manual Grade 6 2008-2009
Education Management Information System (EMIS) Manual 2005
Educators' Guide to Teaching Pohnpeian Studies
Monthly Report April 2005 DOE
Teacher Assignment Activity Schedules and Accountability Plans Division Elementary Education 2007-2008
Application for Pohnpei State Scholarship Funds
History of Pohnpei History (POADOAPOAD) Description and Explanation of Recorded Oral Traditions Manual

Attachment Six - FSM Census Data – 2000

Source: 2000 FSM Census, unpublished data.

General enrolment Rates by level, sex and state

Level	FSM	Yap	Chuuk	Pohnpei	Kosrae
Student enrolment					
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