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# Personnel Management Audit Report

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Chuuk State Department of Education

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for National Department of Education, Palikir, FSM  
July 2010

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**Acknowledgements**

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### **Scope of the audit**

Management audits are required under Education Sector Grant #CSG-FSM-2008-EDU, Special Conditions, Section (c)(2). This audit was commissioned by the Department of Education, FSM National Government. The audit is required under the special terms and conditions of the Fiscal Year 2010 Sector Grants as follows:

*'Special Grant Terms and Conditions*

*JEMCO resolves that the following special grant terms and conditions shall be added to the Fiscal Year 2010 Sector Grants:*

*b) The FSM National Government, not later than October 31, 2009, shall develop a timeline and budget for replicating the Yap model of job/management audits for all state departments of education*  
*[http://www.uscompact.org/files/home/JEMCO\\_ResolutionsFY10.pdf](http://www.uscompact.org/files/home/JEMCO_ResolutionsFY10.pdf).*'

### **General scope of work**

The emphasis of the management audit is on the State Department of Education's personnel policies, procedures and management processes. The general scope of work, as described in the request for proposals, is:

- a. Conduct thorough reviews and analysis of Chuuk DOE personnel structure, policies, and the state's hiring practices for education personnel;
- b. Identify deficiencies and anomalies within the said department's personnel system;
- c. Recommend 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 Chuuk Department of Education to implement. <sup>1</sup>

### **Primary objective**

The primary objective of the audit is to provide the Department of Education, FSM National Government (the client) with a report and recommendations on a focused personnel management audit of the Chuuk State Department of Education. The audit will determine the extent to which the DOE is in compliance with internal and external laws and policies, including its performance management system, 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.

<sup>1</sup> [http://www.fsmed.fm/RFP\\_Job\\_audit\\_Chruik.pdf](http://www.fsmed.fm/RFP_Job_audit_Chruik.pdf)

## Outputs

The outputs of the audit will include a focused personnel management audit of Chuuk State DOE's personnel structure including specific detailed analysis of personnel management, to include:

a review of Chuuk DOE personnel structure, policies and hiring practices of education personnel, including principals, teachers, managers and support staff, the scope of the audit to include an evaluation of compliance with fair and equitable recruitment and service wide personnel management policies and practices. This will include detailed analysis of the extent to which the DOE adheres to existing employment policies relating to issues such as;

- compliance with national, state and local employment laws,
- suitability of individuals for the positions they occupy,
- gender and ethnic diversity,
- conflict of interest including relationships, nepotism and interested party transactions,
- grievance procedures,
- mechanisms to handle transitions in leadership and other key positions,
- background checks on employees, particularly those serving in sensitive areas,
- job descriptions,
- opportunities for professional development and advancement,
- performance evaluations,
- value for money,
- identification of strengths and weaknesses, deficiencies and anomalies within the DOE's personnel system,
- recommendations for possible remedial measures, policy changes and personnel re-structuring based on good practices, research findings and principles,
- a personnel re-structuring plan for Chuuk Department of Education.

## **Methodology**

This audit differs from previous management audits conducted for the National Department of Education in that it was not conducted by contracted independent consultants but by employees of the National Department of Education itself. The rationale behind this approach was to reduce costs, develop internal monitoring and evaluation capacity and strengthen ownership of the audit report.

The audit team was composed of Mr Mario Abelo; Early Childhood Education Coordinator, Ms Emma Nelson-Mori; FSM Teacher Certification Specialist and Mr Kevin Walsh; NDOE Curriculum and Accreditation Specialist.

A number of evaluation reports on Chuuk DOE have been recently produced by external consultants and others. These deal with many of the management issues addressed by audit reports produced for Yap, Kosrae and Pohnpei in 2008 and 2010. This audit report therefore focuses on personnel issues only.

The audit was conducted, as far as possible, using an inclusive participatory methodology, so as to provide an opportunity for management to develop a sense of ownership of the audit report's recommendations and develop skills for future self-evaluation and internal audit.

## **Process**

Three distinct phases were conducted.

### **Phase 1. Establishing criteria**

This phase was concerned with the identification of relevant internal and external performance evaluation criteria from source materials including laws, codes, mandates, policies, mission and vision statements, plans, goals, objectives, targets, service standards and other statutory requirements.

### **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 at the DOE,
- 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 audit team of a report to the client detailing the findings of the audit, including recommendations and relevant restructuring plans. The report includes responses to the audit by the Chuuk State DOE and stakeholders.

## Executive Summary

### Determinations

The personnel audit findings show that the Chuuk State Department of education is in non compliance with 44 of 55 criteria. The audit team made the following determinations.

Summary of Personnel Audit Determinations					
Criteria	Description	Determinations			
		Compliance	Near Compliance	Non Compliance	Undetermined
1	Administration of the education system			1	
2	Employment of qualified personnel			1	
3	Employment of medically fit personnel			2	
4	Assignment and transfer of employees			1	1
5	Employee evaluations			5	
6	Vacancy announcements		1		
7	Competitive examinations			1	
8	Probation period			1	
9	Classification of positions			1	
10	Mandatory retirement			1	
11	Teacher qualifications		1	1	
12	National Standardized Teachers' Test (NSTT)	1	1	2	
13	Individual Certification Plans			1	
14	ECE Written personnel policies		4	4	
15	ECE Staff recruitment and selection procedures			3	
16	ECE Staff background checks			4	
17	ECE Probationary period			1	
18	ECE Reporting child abuse or sexual abuse			1	
19	ECE Staffing patterns		1	2	
20	ECE Personnel Training			1	
21	ECE Personnel Records			3	
22	ECE Personnel Policy		1	7	
<b>Totals</b>		<b>1</b>	<b>9</b>	<b>44</b>	<b>1</b>
<b>%</b>		<b>1.81%</b>	<b>16.36%</b>	<b>80%</b>	<b>1.81%</b>

## Findings

1. There is a widespread lack of adherence to established personnel management codes, laws, mandates and policies.
2. There is a proliferation of positions that exceeds the requirements of the department and that are not resulting in improvements in student learning outcomes.
3. There is significant over-staffing in non-teaching administrative positions, such as computer operators, administrative officers, clerks and others.
4. Assignment of teaching staff is unplanned and arbitrary, resulting in wide discrepancies and inequitable provision of educational services to students.
5. Over-staffing and assignment of non-teaching staff, including security guards, maintenance persons, secretaries and others is inequitable and un-sustainable.
6. There is widespread recruitment and retention of unqualified staff, including uncertified teachers.
7. There is widespread recruitment, promotion and assignment of senior management and advisory staff who do not possess the minimum academic qualifications of a classroom teacher.
8. Approximately 40 employees (3.5% of the workforce) have reached or exceeded the mandatory retirement age of sixty years plus thirty days.
9. The department lacks a system of performance monitoring.
10. The department does not provide adequate provision for professional development.
11. Management, supervision and advisory services are centralized and there is inadequate provision for services to remote schools.
12. There is evidence of gender bias in the appointment of school principals and head teachers in ECE, elementary and secondary schools
13. ECE policies and procedures are outdated and in need of revision.

## Recommendations

The audit team recommends that the DOE undertakes the following actions.

1. Revision and updating of the department's policy manual.
2. Updating and consolidation of data under a single system that is compatible with the National Department of Education and other State Departments of Education.
3. Revision of the current practice of posting vacancy notices so as to make notices more accessible to residents in remote areas.
4. Discontinuation of the current practice of hiring individuals who do not possess the minimum academic qualification required for the position.
5. Enforcement of the mandatory retirement age for all employees.
6. Enforcement of mandatory medical examinations for all employees.
7. Adoption of a policy and formula for staff assignment based on student enrolment and the equitable distribution of certified teachers.
8. Reduction in the number of non-teaching employees.
9. Decentralization of management, supervision and mentoring services to five regional offices, each servicing one senatorial region.
10. Adoption of the minimum academic qualification requirement of a Bachelor's Degree for professional management, advisory and coordinator positions.
11. Incorporation of all ECE personnel under the mainstream education system.
12. Re-organization of non-professional positions at the main DOE office to improve effectiveness and efficiency.
13. Adoption of employee performance management policies including probationary periods for new appointees and periodic performance evaluations for all employees.
14. Revision of the processes involved in conducting competitive examinations for all positions.
15. Revision of the processes involved in the naming and classification of all positions.
16. Revision of the policies and procedures governing the management of ECE.

<b>Criteria 1. Administration of the education system</b>				
	Source	Criteria	Means of Verification	Compliance status
1	State of Truk, Federated States of Micronesia: Policy Manual, Department of Education. Article 1. (page 2).	The Director of Education shall implement all policies established by the State for the governance of education and shall be responsible for administration of the educational system and for supervision of classroom instruction throughout the State.	Compliance with administrative procedures and policies. Data and reports generated by the school and classroom supervision system.	<b>Non Compliance</b> Administrative procedures and policies for governance of education are outdated and are not widely known to employees.  Department chiefs were unable to provide the audit team with data or analysis arising from a comprehensive state-wide system of supervision of classroom instruction.

**Administration of the education system**

The Department of Education’s policy manual was written some time before 1989, at which date the State changed the spelling of its name from Truk to Chuuk. Although the policy manual is outdated, it has not been revised or replaced and so it still remains valid. One copy of the manual was located in the office of the Board of Education. None of the employees interviewed were aware of the policy manual. The policy manual should be updated and distributed to all employees.

Personnel data held by the DOE is poorly administered and managed. The DOE maintains incomplete electronic and paper data files on education employees. The State Public Service also maintains data files on employees of the DOE.

Two personnel data bases were examined by the audit team. One data base contained all employees based at the central office in Weno plus all special education teacher and all school-based employees. The second data base contained all Early Childhood Education (ECE) staff located at the ECE Weno office. DOE personnel data is entered on a simple Excel spreadsheet, with employees listed under the name of their assigned school or department. Ten fields of information are compiled. ECE data contains only 8 fields. The Department was unable to provide any personnel data analysis reports containing trends or projections.

Data provided by the DOE is poorly organized, making analysis difficult. Personnel are listed under the school name and important data is not entered in searchable fields. **Table 1: Nomusofo Junior High School** shows personnel data for Nomusofo Junior High School. The example contains a number of blank fields where information is lacking. All employees at the school are listed, including security guards and a clerk/typist. This listing limits the way in which the data base can be used because it renders the data more difficult to search and extract. Finding the total number of classroom teachers in the DOE, for example, is a more complex process than it need be.

**Table 1: Nomusofu Junior High School**

	A	B	C	D	E	F	G	H	I	J	K	L	M
1008													
1009	<b>Nomusofu Jr. High Sch</b>												
1010													
1011	1	Mitany	Ludwig	School Principal	Male	None			22/10		491.20		
1012	2	Niwine	Marew	Classroom Teacher II	Female	AS	02/21/74	10/01/03	22/3		315.36		
1013	3	Pasina	Lippwe	Classroom Teacher	Female	AS	05/20/54	10/01/02	UNG		190.24		
1014	4	Ancy	Wia	Classroom Teacher II	Female	AS	09/10/79	10/01/03	14/1		190.24		
1015	5	Aniwis	Bernard	Classroom Teacher	Male	None	01/11/54	10/01/03	7/1		132.08		
1016	6	Rino	Ketinas	Classroom Teacher II	Male	AS	01/27/55	10/01/03	22/8		437.52		
1017	8	Melida	Sangechik	Vocation Teacher	Female								
1018	9	Clara	Mosses	Clerk Typist III	Female		06/08/84	04/20/09	12/1		170.72		
1019	10	Patricio	Wasan	Security Guard	Male		03/17/53	07/23/06	5/1		119.92		
1020	11	Efren	Antonio	Maintenance	Male		05/06/57	05/18/09	9/1		146.00		
1021	12	Michael	Kasimiro	Security Guard I	Male	None	04/10/74	10/19/09	5/1		119.92		
1022													
1023	<b>Mortlocks High Sch</b>												
1024													
1025	1	Richard	Carlos	Acting Principal	Male	BS	02/08/51		23/6		409.68		
1026	2	Simon	Sivas	Vice Principal	Male		09/19/50		20/5		315.36		

**Table 2: Elementary Central Office** shows the personnel employed at the Elementary schools division of the DOE central office. Again, data is missing from a number of fields. Fortnightly and annual salary data is entered in columns J and K respectively. The formula  $J_{26}=K$  should apply. However, column K figures for five individuals are missing and the figures are incorrect for individuals 13, 16 and 17. In addition, a classroom teacher is wrongly included in row 12.

**Table 2: Elementary Central Office**

	A	B	C	D	E	F	G	H	I	J	K	L	M
7	<b>Elementary Central Office</b>												
8													
9	1	Kirisos	Victus	Chief of Elementary	Male	BA	01/27/60	05/20/05	28/8	642.56			
10	2	Esly	Kanto	Assistant Chief	Male	BA	04/03/66			450.00			
11	3	Sonopia	Ponochou	Computer Operator	Female	None	01/20/62	05/27/07	11/1	161.92			
12	4	Sondy	Souleng	Classroom Teacher I	Male	None	03/02/57	11/05/91	11/3	180.16	4,684		
13	5	Rikarto	Fabian	Area Supervisor	Male	AS	04/03/64	02/03/91	12/4	201.04	7,064		
14	6	Francis	Francisco	Area Supervisor	Male	AS	09/09/56	09/25/83	19/2	255.44	6,641		
15	7	Santiago	Fimuan	Area Supervisor	Male				22/9	467.28	12,149		
16	8	Ermes	Alafanso	Area Supervisor	Male	None	07/21/57	12/05/05	19/7	303.07	7,513		
17	9	Emilio	Sinem	Area Supervisor	Male	AS	09/13/53	07/28/92	22/8	437.52	5,227		
18	10	Bundy	Refilong	Area Supervisor	Male	BA	07/10/69	11/12/06	23/1	307.52	7,996		
19	11	Rysang	Simina	Area Supervisor	Male	BA	08/18/55	10/01/01	22/1	288.96			
20	12	Steve	Johnny	Area Supervisor	Male	None			19/3	271.68			
21													
22	<b>Iras Demo Sch</b>												
23													
24	1	Sitango	Dawe	School Principal	Male	BS	11/24/52	09/06/69	25/9	561.76	14,606		
25	2	Brid	Dary	Classroom Teacher I	Female	AS	10/17/77	08/08/04	12/1	170.72	4,439		

It has difficult for the audit team to determine exactly how many persons are employed by the DOE. Figures vary in different data sources, data is spread between different databases, the databases are difficult to interrogate and they contain many errors. Personnel data is spread among a number of data bases at different division offices rather than held in a central database. Many data fields in the personnel listing provided by the DOE to the audit team are blank. The DOE employs two personnel specialists, two data entry personnel, one statistics specialist, two data technicians and twelve computer operators, making a total of at least 19 employees who are in some way responsible for personnel and data management.

The Sector11/SEG10 plan contains provision for 1,220 employees. The total estimated payroll in the Sector11/SEG10 is \$9.7 million. This represents 77% of Sector, 41% of SEG and 66% of total funding.

It is recommended that the DOE updates and consolidates all data within one searchable data base that is compatible with the data base used by the National Department of education and other State Departments of Education.

**Table 3: DOE office management and professional personnel** has been extracted from the DOE databases held at the central office and at ECE (some spelling errors in the database have been corrected). The combined DOE data bases show 87 employees or vacant positions in managerial, coordination or professional support at the central office or ECE office.

Table 3: DOE office management and professional personnel								
Position	Male	Female	Position	Male	Female	Position	Male	Female
Executive Director	0	1	Ed. Program Specialist	0	1	Counsellor III	1	0
Acting Deputy Director	1	0	Education Specialist	2	1	Counsellor IV	1	0
Chief Curriculum and instruction	1	0	Education Specialist (Agriculture)	1	0	Cultural Specialist	1	0
Chief of Elementary	1	0	Education Specialist (Math)	1	0	Cultural Study Researcher	3	1
Chief of Secondary	1	0	Education Specialist (Social Studies)	1	0	Curriculum Writer	1	0
Area Supervisor	10	0	Education Specialist I	0	1	Special Education Coordinator	0	1
Assessment Specialist	0	1	Education Specialist II	1	0	Supervisor	0	1
Assistant Chief of Elementary	1	0	Education Specialist III	1	0	Teacher Training Coordinator II	1	0
Assistant Chief of C&I	1	0	Liaison Specialist	1	0	Technical education Coordinator	1	0
Assistant Chief of Secondary	1	0	Media Specialist	1	0	Vocational Specialist	1	0
Assistant Teacher Training Coordinator	1	0	Mentor Teacher (Acting EIP Coordinator)	1	0	Chief of Special Services	1	0
Asst. Chief Special Service	0	1	Mentor Teacher (Ed. Specialist II)	0	4	ECE Family & Community Supervisor	v	v
Asst. Social Studies Specialist	1	0	Mentor Teacher (Ed. Specialist III)	1	1	Health Specialist	v	v
Asst. Sp. Ed. Coordinator	1	0	Nutrition Specialist I	1	0	Nutrition Specialist	0	1
Assistant Coordinator	1	0	Program Coordinator	1	0	Education Specialist	0	0
Researcher	0	1	Project Director, VIP	0	1	Transition Aide	1	0
Scholarship Coordinator II	0	1	ECE Special Assistant	1	0	Nutrition Aide	1	0
ECE Program Coordinator	1	0	ECE Education & Health Supervisor	0	1	ECE Family Service Worker	5	0
Deputy ECE P. Coordinator	0	1	Feeding Program & Supplies Supervisor	0	1	ECE nurse	v	v
ECE Mentor Supervisor	0	1	ECE Transition Specialist	1	0	ECE dental nurse	1	0
ECE Disability Specialist	1	0	ECE Teacher Mentor	2	2	ECE Parent Involvement Officer	0	1
Column total	23	7	Column total	17	13	Column total	19	5
	Male	Female	Vacant	Positions	V = vacant			
<b>Total</b>	<b>59</b>	<b>25</b>	<b>3</b>	<b>87</b>				

**Table 4: DOE office administrative and support personnel** has been extracted from the DOE databases held at the central office and at ECE (some spelling errors in the database have been corrected). The combined DOE data bases show 88 employees or vacant positions in administrative and support positions at the main DOE office or ECE office.

Table 4: DOE office administrative and support personnel								
Position	Male	Female	Position	Male	Female	Position	Male	Female
Accountant	0	1	Maintenance Support Supervisor	1	0	Computer Operator	0	7
Accountant Clerk	0	1	Property & Equipment Specialist	v	v	Computer Operator I	0	3
Accountant I	0	1	Equipment Operator I	1	0	Computer Operator III	0	1
Accountant IV	0	1	Janitor	0	1	Data Technician	0	2
Accounting Technician	1	1	Maintenance	5	0	Statistics Specialist	0	1
Accounting Technician II	0	1	Media Operation/Repairman	1	0	Warehouse Manager	1	0
Accounting Technician II	v	v	Plumber	1	0	Warehouseman	3	0
Administrative Officer	2	1	Machine Repairman	1	0	Security Guard	2	0
Administrative Officer III	1	1	Maintenance Aide	2	0	Security Guard I	2	0
Administrative Assistant	1	5	Secretary	0	1	Security Guard II	1	0
Administrative Secretary	0	1	Clerk Typist II	0	2	Houseparent	2	1
Business Manager	0	1	Medical Clerk	0	1	Clerk I	0	1
Personnel Specialist	1	2	Office Aide	v	v	Secretary	0	1
Data Entry Personnel	0	1	Boat Operator	3	0	Secretary II	0	1
Scholarship Coordinator II	0	1	Bus Driver	8	0	Custodian	2	1
Column total	6	19	Column total	23	5	Column total	13	19
	Male	Female	Vacant	Positions	V = vacant			
<b>Total</b>	<b>42</b>	<b>43</b>	<b>3</b>	<b>88</b>				

Table 4 and 5 show a total of 175 management, supervisory, administrative and support positions. These are office-based positions in either the central DOE or ECE offices in Weno. DOE data shows a further 180 school-based non-teaching staff including 11 clerks and secretaries, 1 librarian, 28 house parents, 69 cooks, 17 maintenance personnel, 41 security guards plus others.

DOE data shows a total of 774 school-based teaching staff, including principals, head teachers, vocational teachers, special education teachers, ECE teachers and teacher aids. This gives a total of 1,129 employees and vacant positions, which is 100 short of the Sector 11/SEG 10 plan provision for 1,220 employees. **Table 5: Summary of Chuuk State Department of Education employees and location** shows the number of employees by category and location.

<b>Category</b>	<b>Location</b>	<b>Total</b>	<b>Percentage of total</b>
Management, coordination, supervisory and other professional staff	DOE main office and ECE office, Weno	87	7.70%
DOE office administrative and support personnel	DOE main office and ECE office, Weno	88	7.79%
School-based principals, head teachers and teachers	Public secondary and elementary schools and ECE centres	774	68.55%
School-based non-teaching staff	Public secondary and elementary schools and ECE centres	180	15.94%
<b>Total</b>		<b>1,129</b>	<b>99.98</b>

In *'Federated States of Micronesia: Strengthening Public Sector Performance, February 2010'*, Victor Levine reported that the DOE had identified 810 teachers in its teacher training and certification plan.

The DOE reported a total of 901 teachers in the 2009 JEMCO report. This may include teachers in private schools. In the 2010 JEMCO report, the DOE reported a total of 880 teachers. The following extract from a DOE data file provided to the audit team shows a total of 847 teachers in public and private schools.

	No. of School	No. of Teachers	Enrollment
Public Elem. Schools	83	454	9,306
Public Sec. Schools	14	148	2,288
Private Elem. Schools	4	50	760
Private Sec. Schools	7	49	700
ECE	45	85	990
Special Education		61	
<b>Total</b>	<b>153</b>	<b>847</b>	<b>14,044</b>

The same data file showed a total of 939 teachers with 828 teachers in public schools.

<b>TOTAL FOR ALL PUBLIC &amp; PRIVATE SCHOOLS</b>	<b>939</b>
<b>TOTAL FOR ALL PRIVATE SCHOOLS</b>	<b>111</b>

The audit team found no data on any of the 120 local traditional teachers mentioned in the Education Sector FY 2011 SEG FY 2010 proposed budget. A total of \$286,200 was budgeted for these teachers.

<b>Criteria 2. Employment of qualified personnel</b>				
	Source	Criteria	Means of Verification	Compliance status
1	State of Truk, Federated States of Micronesia: Policy Manual, Department of Education. Section 401: Employment Practices (page 22).	In employing personnel to fill any position available in the Department of Education, the Director will seek to employ the most qualified persons. Age, sex, racial or national origin, political or religious belief shall not be considered in determining qualifications for employment, nor shall the equal protection of the laws be denied.	Personnel data. % male / female % in age bands % meeting certification requirements	<p><b>Non Compliance</b></p> <p>Data provided by the DOE indicates that of 27 classroom teachers hired in the last 12 months, nine (33%) did not meet the minimum posted criteria of possessing an AA/AS degree.</p> <p>Data shows a total of 71 employees holding a bachelor's degree or higher. However, in a sample of 60 employees in senior management, advisory or coordinating positions, only 15 (25%) hold a bachelor's degree or higher qualification. In the same sample, 24 (40%) hold an associate degree or higher while 36 (60%) do not have a degree or their highest level of qualification is blank.</p> <p>Data indicates that of 838 DOE main office and school-based teaching employees, including principals, 433 (51.67%) are male and 405 (48.32%) are female. However, of 108 school principals, 71 (65.7%) are male and 37 (34.3%) are female.</p> <p>Data indicates that of a sample of 60 employees in senior positions, 42 (70%) are male and 18 (30%) are female. Data indicates that there are 737 uncertified teachers in the DOE.</p>

## Employment practices

Audit team findings indicate that the State Department of Education is not in compliance with all employment criteria.

Aside from four vacancy notices for ECE staff posted in 2010, the ten most recent vacancy notices found in the Public Service Personnel Office date from July 2007 to March 2009. Vacancy notices are posted for a minimum of ten days or remain continuously open. A vacancy notice issued in August 2007 for classroom teachers remains open.

**Table 6: Highest qualification of 27 classroom teachers hired in 2009** shows the minimum qualifications held by classroom teachers hired in 2009. Minimum educational qualification requirements are posted on all vacancy notices. The minimum qualification for a classroom teacher, posted in 2007, is an AA/AS degree. However, of the 27 classroom teachers hired between January and December 2009, nine (33.3%) did not meet the minimum criteria of an AA/AS degree or no data was entered in the personnel data file.

<b>Table 6: Highest qualification of 27 classroom teachers hired in 2009</b>						
<b>First name</b>	<b>Last name</b>	<b>Position</b>	<b>Gender</b>	<b>Highest qualification</b>	<b>Date of birth</b>	<b>Date of hire</b>
Rine	Manuel	Classroom Teacher I	Female	AS	04/22/55	05/18/09
Luke	Shirai	Classroom Teacher I	Male	AS	11/09/84	05/18/09
Robert	Mailo	Classroom Teacher	Male	None	06/12/80	06/29/09
Gina	Defang	Classroom Teacher I	Female	AS	10/23/84	12/21/09
Kayme	Cheipot	Classroom Teacher	Female	AA	07/11/85	06/15/09
Randy	Michiuo	Classroom Teacher I	Male	AS	07/03/84	09/07/09
Teichy	Reitaun	Classroom Teacher I	Male	AS	03/13/86	05/09/09
Siota	Stephen	Classroom Teacher I	Male	None	08/02/53	09/28/09
Marcina	Stephen	Classroom Teacher I	Female	No data	11/30/56	12/21/09
Swelling	Lippwe	Classroom Teacher II	Male	AS	03/11/54	01/19/09
Mariko	Michiuo	Classroom Teacher I	Female	None	10/15/78	11/02/09
Mondale	Tim	Classroom Teacher	Male	None	08/12/84	01/19/09
Gladwin	Kato	Classroom Teacher	Male	None	10/09/87	01/19/09
Sylvia	Fred	Classroom Teacher I	Female	AS	01/25/85	08/10/09
Serly	Ruben	Classroom Teacher I	Female	AS	04/21/80	05/18/09
Betty	Lodge	Classroom Teacher I	Female	None	10/21/55	05/18/09
Regina	Lorenzo	Classroom Teacher I	Female	AS	05/05/81	05/18/09
Lorraine	Ysam	Classroom Teacher I	Female	AS	12/19/84	09/28/09
Patricia	Defang	Classroom Teacher I	Female	AS	11/08/82	05/18/09
Liwisa	Joseph	Classroom Teacher I	Female	AS	09/23/84	05/18/09
Jane	Papa	Classroom Teacher I	Female	No data	06/09/69	05/18/09
Jack	Semwen	Classroom Teacher I	Male	None	03/26/71	05/18/09
Susan	Shimmy	Classroom Teacher II	Female	AS	06/01/58	01/19/09
Edy	Nifon	Classroom Teacher I	Male	AA	02/18/86	10/19/09
Felicidas	Shirai	Classroom Teacher I	Female	AA	05/25/81	11/02/09
Daniel	Fidel	Classroom Teacher I	Male	AS	11/18/87	09/07/09
Kasmira	Kanas	Classroom Teacher I	Female	AS	05/29/85	05/18/09

**Table 7: Highest degree held by Chuuk DOE professional (excluding non-teaching) employees** below shows that up to 40.33% of all employees in the DOE data base (excluding non-teaching staff) do not have any qualification equivalent to or higher than an associate degree.

<b>Table 7: Highest degree held by Chuuk DOE professional (excluding non-teaching) employees (excluding non-teaching staff)</b>						
<b>Degree</b>	<b>Total number</b>	<b>Total number as percentage of total employees</b>	<b>Male</b>	<b>Males as percentage of total</b>	<b>Female</b>	<b>Females as percentage of total</b>
None	338	40.33%	180	21%	158	19%
AA	56	6.68%	24	3%	32	4%
AS	373	44.51%	183	22%	190	22%
BA	44	5.25%	24	3%	20	2%
BS	25	2.98%	20	2%	5	1%
MS	2	0.24%	2	0%	0	0%
Total central office and teaching employees	838	100%	433	52%	405	48%

The personnel data file provided by the ECE department did not include a field on academic qualifications.

None of the DOE personnel data files contained a field showing information on the certification status of teachers. Data provided by the NDOE teacher certification specialist indicates that there are 164 certified teachers (18.2%) and 737 (81.8%) uncertified teachers and in Chuuk. This compares unfavourably with the national figure of 587 certified teachers (29.7%) and 1387 uncertified teachers (70.3%).

**Table 8: Highest qualification held by DOE senior professionals** shows data on sixty management, advisory and promoted professional staff, extracted from the DOE data base provided to the audit team.

<b>Table 8: Highest qualification held by DOE senior professionals</b>				
<b>First name</b>	<b>Last name</b>	<b>Position</b>	<b>Gender</b>	<b>Highest degree</b>
Kirisos	Victus	Chief of Elementary	Male	BA
Esly	Kanto	Assistant Chief	Male	BA
Rikarto	Fabian	Area Supervisor	Male	AS
Francis	Francisco	Area Supervisor	Male	AS
Santiago	Fimuan	Area Supervisor	Male	No data
Ermes	Alafanso	Area Supervisor	Male	None
Emilio	Sinem	Area Supervisor	Male	AS
Bundy	Refilong	Area Supervisor	Male	BA
Rysang	Simina	Area Supervisor	Male	BA
Steve	Johnny	Area Supervisor	Male	None
Peter	James	Chief of Secondary	Male	No data
Johndy	Nakamura	Assistant Chief of Secondary	Male	BA
Karsina	Anep	Administrative Assistant	Female	None
Paula	Fritz	Accounting Technician	Female	AS
Kiniosy	Edmond	Assistant Chief of Sec.	Male	BA
Sanfio	Sony	Acting Executive Director	Male	MS
Noha	Ruben	Acting Deputy Director	Male	No data
Eliseus	Akapito	Administrative Officer III	Male	No data
Mita	Santos	Administrative Officer	Female	None
Ketcy	Hainrick	Education Specialist	Female	No data
Eliseus	Akapito	Chief of C&I, CSSS	Male	No data
Sylvia	Eas	Education Specialist I	Female	No data
Mekioshy	William	Education Specialist	Male	None
Amanisio	Joseph	Education Specialist (Agri)	Male	No data
Season	Yesiki	Education Specialist (Math)	Male	BA
Edwin	Raed	Education Specialist (SS)	Male	No data
Penito	Timothy	Education Specialist	Male	No data
Gabriel	Julio	Assistant Social Study Specialist	Male	No data
Juan	Osia	Curriculum Writer	Male	AS
Rufino	Eram	Curriculum Writer	Male	None
Weris	Rain	Education Specialist II	Male	BS
Benisio	Joseph	Vocational Specialist	Male	BS
Adelyne	Okichy	Mentor Teacher	Female	BA
Stachie	Mori	Cultural Study Researcher	Female	None
Dita	Williander	Mentor Teacher	Female	BA
Sansiena	Tatashy	Mentor Teacher	Female	None
MariaPaz	Saimon	Mentor Teacher	Female	BA
Katarina	Rocky	Assessment Specialist	Female	No data

Heram	Eram	Cultural Study Researcher	Male	None
Emphil	Reim	Cultural Study Researcher	Male	None
Singeto	Nimwes	Mentor Teacher	Male	AS
Antero	Rawit	Cultural Study Researcher	Male	None
Katrino	Dawe	Mentor Teacher	Male	AA
Herry	Naka	Education Specialist III	Male	AS
Geraldine	Akapito	Researcher	Female	No data
Pastora	Mwangin	Mentor Teacher	Female	No data
Ansina	Kony	Special Education Coordinator	Female	No data
Stephen	Marcus	Assistant Special Education Coordinator	Male	AS
Mary	Cholymay	Supervisor	Female	BA
Carleen	Mefy	Education Program Specialist	Female	No data
Sisinio	Willy	Chief of Special Services	Male	No data
Achilina	Sana	Assistant Chief Special Services	Female	None
Mainat	Tong	Teacher Training Coordinator II	Male	No data
Antasio	Bisek	Assistant Teacher Training Coordinator I	Male	No data
Harvey	Fritz	Technical Coordinator	Male	No data
Iromy	Bruton	Project Director, PVEIP	Female	BS
Rockhudson	Tomy	Program Coordinator	Male	No data
Steven	Lino	Case Manager	Male	No data
Ansy	Louis	Counselor III	Male	No data
Kaim	Filipus	Counselor II	Male	No data

The table shows that of sixty senior employees in management, advisory and promoted professional roles, a total of thirty six (60%) do not possess an associate degree, which is the basic qualification required of a classroom teacher. According to the data provided by the DOE, such senior post holders as the chief of secondary education, acting deputy director of education, chief of curriculum and instruction, special education coordinator and teacher training coordinator do not have an associate degree. In addition, three out of eight area supervisors do not have a degree, six out of seven education specialists do not have a degree and two out of six teacher mentors do not have the minimum qualification required of a classroom teacher. These figures indicate that the most qualified persons may not have been appointed to these important senior positions.

This situation reflects poorly on a system that should value and promote education and life-long learning.

<b>Criteria 3. Employment of medically fit personnel</b>				
2	State of Truk, Federated States of Micronesia: Policy Manual, Department of Education. Section 402.1: Physical Examinations (page 23).	Evidence of freedom from communicable diseases. All persons seeking employment in the preparation of food must submit to medical examination and qualify for a food handler's permit certifying that the individual has been found to be free of communicable disease.	Sample from personnel files.	<b>Non Compliance</b> None of the personnel files examined contained certificates of evidence of freedom from communicable diseases. Personnel specialists confirmed that such evidence was no longer requested of potential employees.
3	State of Truk, Federated States of Micronesia: Policy Manual, Department of Education. Section 402.2: Physical Examinations (page 23).	Thereafter, such employees shall be required to submit to such medical examination annually to certify that the employee remains free of communicable disease.	Sample from personnel files.	<b>Non Compliance</b> None of the personnel files examined contained evidence of annual medical examinations. Personnel specialists confirmed that such evidence was no longer requested of employees.

The audit team did not find any evidence, in data or personnel files, of medical examinations confirming the fitness of new recruits or existing personnel. Personnel officers informed the audit team that the DOE no longer requested initial and annual medical checks. However, the audit team found no evidence of a change in policy.

The current practice of recruiting and retaining employees without carrying out routine medical examinations places vulnerable children at risk from infectious diseases, exacerbates potential absence or employees and places a potential burden on the state and national public service employees' medical insurance system.

<b>Criteria 4. Assignment and transfer of employees</b>				
	Source	Criteria	Means of Verification	Compliance status
1	State of Truk, Federated States of Micronesia: Policy Manual, Department of Education. Section 404.1: Assignment and transfer (page 26).	The assignment and transfer of employees to positions and locations of employment within the Department of Education are as approved by the Director.	Policy for the assignment of personnel to schools. Sample of signed personnel actions from personnel files. Personnel assignment records.	<b>Non Compliance</b> The audit team found no evidence of a policy governing the assignment of personnel to schools or of a formula setting out the number of teachers of other staff required of schools of different sizes and types.  Data indicates that the teacher:student ratio varies from 1:8 at Nomwin Elementary School to 1:80 at Sapou Elementary School.
2	State of Truk, Federated States of Micronesia: Policy Manual, Department of Education. Section 404.2: Assignment and transfer (page 26).	In the approval or disapproval of cases involving the assignment or transfer of employees of the Department of Education, the Director is at all times bound to conform to the rules and regulations governing assignment and transfer of all government employees of the State of Truk.	Sample from personnel files.	<b>Undetermined</b> The audit team found no documentary evidence relating to this criterion.

## Assignment and transfer of employees

The DOE does not have a policy on teacher or other employee assignment or deployment. There is no agreed formula for establishment or deployment of personnel to schools. There are numerous examples in inequity in deployment. There are numerous examples of the appointment of individuals who do not meet the stated minimum academic qualifications for the post in question.

According to the JEMCO 2009 report Chuuk DOE has a total public elementary and secondary school enrolment of 13,495 students and a total of 690 teaching staff. This gives an average teacher student ratio of 1:19. The audit team found a total of 774 principals and teachers, including special education teachers, resulting in a ratio of 1:17.41. The actual teacher student ratio varies from 1:8 at Nomwin Elementary School to 1:80 at Sapou Elementary School and from 1:9 at Halls Junior High School to 1:32 at Weipat High School.

There is gender inequity in the deployment of elementary and high school principals. 71 of 108 principals in elementary schools (65.7%) are male while 37 are female (34.3%). In 14 junior high and high schools, 13 principals are male. One school does not have a principal. There are no female principals in any of the junior high or high schools.

Maintenance, secretarial and other school-based support staff are unevenly distributed and in some cases schools are overstaffed with non-teaching employees. Halls Junior High School has 6 teaching and 11 non-teaching staff for 45 students. Nomusofu Junior High School has 6 teaching staff and 4 non-teaching staff for 57 students. Faichuk High School has 10 teachers for 223 students while Southern Namoneas High School has 15 teachers for 221 students.

The employment of maintenance, security, catering and other non-teaching employees, including a plumber, appears to be arbitrary and excessive. DOE data shows a total of 43 security guards. 9 security guards are employed at Chuuk High School and 3 at the neighboring Weno High School. Faichuk High School employs 5 cooks, 2 maintenance persons, 1 custodian and 5 security guards and has an enrolment of 223 students. Only one elementary school (Nechap; enrolment 114) has a maintenance employee. The largest elementary school, Iras, with an enrolment of 498 students, does not have a cleaner or maintenance person.

The FSM Teacher Certification Policy states in Section 1. Educational Backgrounds;

*‘Any person applying for a teaching position or is currently teaching in any FSM School System must possess any of the following qualifications:*

- a. Associate of Arts (AA) degree or an Associate of Science (AS) degree to be qualified to teach at ECE-8 level schools; and,*
- b. Bachelor of Arts (BA) degree or a Bachelor of Science (BS) degree to be qualified to teach at 9-12 level schools’.*

In elementary schools, teachers with the minimum degree required are unevenly distributed. **Table 9: Highest academic qualification: Central Wonip Elementary School** shows that 100% of teachers at Central Wonip Elementary School have an AA/AS or higher. **Table 10: Highest academic qualification: Onou Elementary School** shows that 0% of teachers at Onou Elementary School have the minimum degree required.

1	Tafko	Epineisar Willy	School Principal	Female	BA
2	Florensia	Afituk	Classroom Teacher	Female	AS
3	Tosimiko	TotoshyKilisou	Classroom Teacher II	Female	AS
4	Ansichko	Esa	Classroom Teacher II	Female	AS
5	Katson	Ytepes	Classroom Teacher II	Male	AS
6	Wincy	Siro (Ysauo)	Classroom Teacher II	Male	AS
7	Epin	Haser	Classroom Teacher II	Male	AS
8	Generous	Haser	Classroom Teacher I	Male	AS

1	Basilio	Wishim	School Principal I	Male	None
2	Atum	Max	Classroom Teacher	Male	None
3	Ermino	Max	Classroom Teacher	Male	None
4	Kamino	Max	Classroom Teacher	Male	None
5	Iasuo	Smith	Classroom Teacher	Male	None
6	Francis	London	Classroom Teacher	Male	None

A further six elementary schools, including two annexes, are staffed entirely by principals and teachers who do not have the minimum requirement of an associate degree. These are Foup and Annex (9 staff), Winifei (2 staff), Nechocho (3 staff), Nethon (4 staff), Chukuram (3 staff) and Neirenomw and Annex (12 staff). Students in these schools are at a distinct disadvantage compared to students in schools such as Tamatam, Makur, Murilo, Satawan, Moch, Ettal and others where all staff members have the minimum associate degree required of a classroom teacher and some have bachelor’s degrees.

In order to address inequities in the system, a policy on teacher assignment is recommended. This policy would determine the required number of teachers for each school based on the total enrolment. A series of bands could be applied to take account of different levels of enrolment.

**Table 11: Recommended teacher assignment and school bands** shows how schools could be banded according to maximum enrolment and the number of staff needed for each band.

Table 11: Recommended teacher assignment and school bands							
Band	Enrolment	Head teacher with teaching role	Principal without teaching role	Vice principal with teaching role	Vice principal without teaching role	Number of teachers	Maximum average teacher student ratio
1	0-39	1				3	9.75
2	40-59	1				3	14.75
3	60-79	1				3	19.75
4	80-99	1				3	24.75
5	100-119	1				3	29.75
6	120-139		1			6	19.85
7	140-159		1			6	22.7
8	160-179		1			6	25.5
9	180-199		1			6	28.4
10	200-219		1			8	24.3
11	220-239		1			8	26.5
12	240-259		1			8	28.7
13	260-279		1			12	21.4
14	280-299		1			12	23.0
15	300-319		1			12	24.5
16	320-339		1			12	26.0
17	340-359		1			12	27.6
18	360-379		1	1		15	22.2
19	380-399		1	1		15	23.4
20	400-419		1	1		15	24.6
21	420-439		1		1	15	25.8
22	440-459		1		1	15	27
23	460-479		1		1	20	21.7
24	480-499		1		1	20	22.6

This banding system would have two benefits. It would offer students equal opportunity to learn in classroom settings that were not overcrowded and would allow the system to respond to rising or falling enrolments. Due to the geographical nature of the state of Chuuk, where there are numerous small islands with low populations, it would be necessary to have a minimum number of four teachers. As elementary schools cater for students from grade 1 to grade 8, staffing levels must be adapted to accommodate 8 grade levels. Multi-grade teaching is the most efficient way to organize small schools.

**Table 12: Recommended Class organization** shows how classes may be arranged in different sized schools.

Table 12: Recommended Class organization																					
School size bands	Number of classes	Arrangement of classes																			
1-5	4	1&2	3&4	5&6	7&8																
6-9	6	1&2	2&3	4&5	5&6	7	8														
10-12	8	1	2	3	4	5	6	7	8												
13-17	12	1	1&2	2	3	3&4	4	5	5&6	6	7	7&8	8								
18-22	16	1	1	2	2	3	3	4	4	5	5	6	6	7	7						
23-24	20	1	1	1&2	2	2	3	3	3&4	4	4	5	5	5&6	6	6	7	7	7&8	8	8

Annex schools generally cater for students from grades 1 to 4. Small annex schools can operate with 2 teachers by combining Grades 1&2 and Grades 3&4.

**Table 13: Proposed teacher deployment** shows current and proposed teacher deployment based on the recommended teacher assignment and school bands above. The proposed deployment would reduce the total teacher complement for elementary schools from 450 to 432. There would be a slight increase in the teacher student ratio from 20.6 to 21.5. However, disparities between schools would be reduced and the highest ratio would be 28.5.

The audit team believes that achieving an equitable distribution of qualified and certified teachers would have a positive impact on student achievement. This would mean that all schools would have at least 50% qualified and certified teachers on the staff. These qualified and certified teachers could mentor and support unqualified teachers. All schools should be led by a certified principal or head teacher.

In addition, consideration should be given to closure and consolidation of some schools. A School Facilities Consolidation Plan prepared in 2006 contained recommendations for the closure and consolidation of a number of schools and annexes. Some recommendations were made based on the condition of the school buildings or the land tenure, but further consideration should be given to dealing with chronically under-performing schools by closing them and relocating the students. The National Department of Education will conduct a school accreditation process commencing in September 2010 and the results of school assessments could be used to identify chronically under-performing schools for turnaround or closure.

Table 13: Proposed teacher deployment; Elementary schools							
School	Current deployment				Proposed deployment		
	Number of teachers including principal	Total enrolment	Ratio		Number of teachers including principal	Total enrolment	Ratio
Iras Demo	29	498	17.2		22	498	22.6
Mechitiw Elementary	12	185	15.4		7	185	26.4
Mwan Elementary	12	305	25.4		13	305	23.4
Neauo Elementary	8	334	41.8		13	334	25.6
Neauo Annex (Wichap)	5	94	18.8		4	94	23.5
P&P Elementary	5	140	28.0		7	140	20
Sapuk Elementary	6	186	31.0		7	186	26.5
Fonoton Elementary	7	106	15.1		4	106	26.5
PiisPaneu Elementary	3	84	28.0		4	84	21
Kuchuwa Elementary	5	124	24.8		7	124	17.7
Sino Memorial Elementary	9	368	40.9		17	368	21.6
Nechap Elementary	5	114	22.8		4	114	28.5
Nukuno Elementary	7	149	21.3		7	149	21.2
Etten Elementary	3	42	14.0		4	42	10.5
Inaka Elementary	8	111	13.9		4	111	27.7
Kukku Elementary	7	131	18.7		7	131	18.7
Messa Elementary	9	123	13.7		7	123	17.5
Pwene Elementary	5	90	18.0		4	90	22.5
UFO Elementary	8	94	11.8		4	94	23.5
West Fefen Elementary	8	161	20.1		7	161	23

Sapore Elementary	6	107	17.8	4	107	26.7
Parem Elementary	3	75	25.0	4	75	18.7
Siis Elementary	2	77	38.5	4	77	19.2
Kuchu Elementary	6	157	26.2	7	157	22.4
Sapota Elementary	6	179	29.8	7	179	25.5
Panitiw Elementary	9	191	21.2	7	191	27.2
Udot Elementary	5	291	58.2	13	291	22.3
Eot Elementary	5	95	19.0	4	95	23.7
Fanapanges Elementary	3	145	48.3	7	145	20.7
Romanum Elementary	5	109	21.8	4	109	27.2
Amwachang Elementary	3	58	19.3	4	58	14.5
Amwachang Annex	3	65	21.7	3	65	21.6
Foup Elementary	4	85	21.3	4	85	21.2
Foup Annex	4	97	24.3	4	97	24.2
Wichukuno Elementary	6	85	14.2	4	85	21.2
Faro Elementary	9	78	8.7	4	78	19.5
Winifei Elementary	1	54	54.0	4	54	13.5
Munien Elementary	11	74	6.7	4	74	18.5
Nechocho Elementary	3	29	9.7	4	29	7.25
Central Wonip Elementary	7	135	19.3	7	135	19.2
West Wonip Annex	4	28	7.0	2	28	14
East Wonip Elementary	4	106	26.5	4	106	26.5
Fason Elementary	5	197	39.4	7	197	28.1
Chukuram Elementary	3	102	34.0	4	102	25.5
Manaio Elementary	4	70	17.5	4	70	17.5
Nethon Elementary	3	54	18.0	4	54	13.5
Neirenomw Elementary	6	101	16.8	4	101	25.2
Neirenomw Annex (Neppi)	5	93	18.6	4	93	23.25
Sapou Elementary	1	80	80.0	4	80	20
Epin Elementary	7	91	13.0	4	91	22.75
Enpin Annex (Inaka)	2	22	11.0	2	22	11
Nukaf Elementary	2	93	46.5	4	93	23.2
Sapota Elementary	3	133	44.3	7	133	19
TeruoBokuku Memorial Elementary	6	138	23	7	138	19.7
Tonokas Annex	4	47	11.75	2	47	23.5
Nema Elementary	8	194	24.3	7	194	27.7
Losap Elementary	5	93	18.6	4	93	23.2
Pisemwar Elementary	7	89	12.7	4	89	22.2
Namoluk Elementary	8	100	12.5	4	100	25
Ettal Elementary	6	62	10.3	4	62	15.5
Kuttu Elementary	6	147	24.5	7	147	21
Moch Elementary	9	108	12.0	4	108	27
Oneop Elementary	6	102	17.0	4	102	25.5
Lekinioch Elementary	9	184	20.4	7	184	26.2
Ta Elementary	3	81	27.0	4	81	20.2

Ta Annex	2	31	15.5		2	31	15.5
Satowan Elementary	8	128	16.0		7	128	18.2
Murilo Elementary	3	85	28.3		4	85	21.2
Nomwin Elementary	7	58	8.3		4	58	14.5
Ruo Elementary	6	84	14.0		4	84	21
Fanaru Elementary	1	68	68.0		4	68	17
Mokur Elementary	1	35	35.0		4	35	8.7
Piherarh Elementary	5	70	14.0		4	70	17.5
Onou Elementary	5	51	10.2		4	51	12.7
Unanu Elementary	4	46	11.5		4	46	11.5
Onoun Elementary	2	135	67.5		7	135	19.2
Houk Elementary	4	99	24.8		4	99	14.7
Tamatam Elementary	3	79	26.3		4	79	19.7
Polowat Elementary	6	85	14.2		4	85	21.2
Pollap Elementary	5	112	22.4		4	112	28
<b>Totals</b>	<b>450</b>	<b>9,306</b>	<b>20.6</b>		<b>432</b>	<b>9,306</b>	<b>21.5</b>

With the current number of schools and student enrolment, elementary schools in Chuuk are not particularly over-staffed. Poor distribution and low rates of teacher certification are the issues that are most likely to contribute to low student achievement. A more equitable distribution of teachers according to a simple formula based on enrolment would result in a modest decrease in numbers of 18 (4%). In addition, a more equitable distribution of certified teachers might have a positive impact on student performance.

A program of consolidation of schools, with concurrent removal of uncertified teachers and principals, has the potential to improve the quality of teaching. A School Facilities Consolidation Plan was completed by the National Department of Education in 2006. This recommended the consolidation and closure of a number of small, under-performing schools.

Staff deployment to Junior High and High schools is a more problematic issue. Factors such as the range of subjects on offer and the specialism required of staff must be considered.

Student performance, as measured by the number of students who pass the College of Micronesia Entrance Test (COMET) is extremely low. An audit conducted by the Office of the National Public Auditor noted that 10 of 312 (3%) students from Chuuk public high schools passed the Spring 2008 COMET (p16, *Audit of Chuuk State Department of Education Textbooks and Instructional Materials* available at [http://www.fsmopa.fm/files/onpa/2009/ChuukDOE\\_TXTBK.PDF](http://www.fsmopa.fm/files/onpa/2009/ChuukDOE_TXTBK.PDF)).

Low student achievement is inevitable given the low numbers of secondary school teaching staff who meet the minimum academic qualification of a Bachelor's Degree, required under the FSM Teacher Certification Policy. Of a total of 167 professional employees at junior high and high schools, including principals, teachers, librarians and counsellors, 25 (14.97%) had the minimum academic qualification required.

**Table 14: Highest academic qualification: PPO Junior High School** shows that in PPO Junior High School, none of the teachers, including the principal, meet the FSM Teacher Certification policy academic requirements for high schools.

1	Gabriel	Fares	School Principal	Male	None
2	Kalista	Kanfin	Classroom Teacher	Female	AS
3	Keresen	Otokichy Jack	Classroom Teacher	Female	None
4	Monalisa	Chewek	Classroom Teacher I	Female	AS
5	Turcy	Luther	Vocational Teacher I	Female	None
6	Rimiuo	Runte	Classroom Teacher	Male	None
7	Joseph	Antes	Vocational Teacher	Male	None
8	Francis	Hikuta	Vocational Teacher I	Male	None
9	Kasper	Sainash	Classroom Teacher II	Male	AS

**Table 15: Highest academic qualification: Chuuk High School** shows that in Chuuk High School, three of the 35 teachers (8.5%) meet the minimum academic requirement of a Bachelor's Degree.

					Qualification
1	Joanes	Serious	School Principal	Male	BS
2	Kestery	Enlet	Classroom Teacher	Female	AS
3	Martita	Karen Herkes	Classroom Teacher	Female	AA
4	AnaMaria	Eis	Classroom Teacher	Female	AS
5	Arlina	William	Classroom Teacher	Female	BA
6	Bisinda	Sinig	Classroom Teacher	Female	None
7	Choncy	Alexander	Classroom Teacher	Female	AS
8	Joe	Nakamura	Classroom Teacher	Male	AS
9	Kenser	Romer	Classroom Teacher	Male	AS
10	Kio	Chiro	Classroom Teacher	Male	AS
11	Kokiu	Reuney	Classroom Teacher	Male	AS
12	Rufin	Maras	Classroom Teacher	Male	None
13	Francie	Wishim	Classroom Teacher	Female	AS
14	Madleen	Inek Otosty	Classroom Teacher I	Female	AS
15	Judeline	Ezra	Classroom Teacher I	Female	AS
16	Lorna	Lippwe	Classroom Teacher I	Female	None
17	Sinser	Yesiki	Classroom Teacher I	Female	None
18	Allen	Emuch	Classroom Teacher I	Male	AS
19	Gramlick	Simion	Classroom Teacher I	Male	AA
20	Hermينو	Romos	Classroom Teacher I	Male	AS
21	Michael	Olap	Classroom Teacher I	Male	AS
22	Spencer	Yleizah	Classroom Teacher I	Male	AS
23	Kevlyn	Hebwer	Classroom Teacher II	Female	AS
24	Miter	Bernard	Classroom Teacher II	Female	AS
25	Susan	Shimmy	Classroom Teacher II	Female	AS
26	Elma	Mathias	Classroom Teacher II	Female	AS
27	Christian	Hengio	Classroom Teacher II	Male	BS
28	Erson	Martin	Classroom Teacher II	Male	AS
29	Keleb	Simor	Classroom Teacher II	Male	AS
30	Edy	Nifon	Classroom Teacher I	Male	AA
31	Felicidas	Shirai	Classroom Teacher I	Female	AA
32	Lora	Hartman	Vocational Teacher	Female	None
33	Murae	Alaph	Vocational Teacher	Female	AS
34	Kina	Enlet	Vocational Teacher	Female	AS
35	Asepal	Danny Paul	Vocational Teacher	Male	None

Teacher:student ratios in secondary schools vary from 1:8.9 in PPO Junior High to 1:32.6 in Weipat High.

Compared to elementary schools, teacher deployment to Junior High and High schools is a much more problematic issue. Factors such as the range of subjects on offer and the required specialism of staff must be considered. However, data on teacher specialism has not been made available to the audit team. The audit team recognizes that in secondary schools, changes in the teacher:student ratio alone will not bring great improvements in student achievement while under-qualified teachers remain in the classrooms. It is recommended that the DOE look at ways in which to increase the number of qualified secondary teachers, such as by actively recruiting Chuukese graduates through offering incentives, recruiting from overseas and increasing the deployment of international volunteers. In addition, experienced and qualified specialists could be redeployed from the main DOE office in Weno. Experienced and qualified subject specialists should be placed in departmental leadership roles within each school or cluster of schools, with oversight of unqualified teachers.

The proposal in **Table 16: Proposed teacher deployment; Secondary Schools** is based on a ratio of 1 teacher to about 20 students.

<b>Table 16: Proposed teacher deployment; Secondary Schools</b>							
<b>Teacher Deployment</b>	<b>Current deployment</b>				<b>Proposed deployment</b>		
	Number of teachers including principal	Total enrolment	Ratio		Number of teachers including principal	Total enrolment	Ratio
Chuuk High School	34	543	16.0		29	543	18.72
Weno High School	27	406	15.0		21	406	19.33
SNHS Tonoas	15	221	14.7		12	221	18.41
SNHS Fefen	9	177	19.7		9	177	19.66
Faichuk High School	10	223	22.3		12	223	18.58
PPO Jr. High	8	71	8.9		4	71	17.75
Nomusofo Jr. High	6	57	9.5		3	57	19.00
Mortlock High School	11	131	11.9		7	131	18.71
Moch Jr. High	6	130	21.7		7	130	18.57
Lukeisel Jr. High	6	59	9.8		3	59	19.66
Weipat High School	5	163	32.6		9	163	18.11
Pattiw Jr. High	3	30	10.0		2	30	15.00
Halls Jr. High	5	45	9.0		3	45	15.00
Pollap & Tamatam Jr. High	3	32	10.7		2	32	16.00
<b>Totals</b>	<b>148</b>	<b>2288</b>	<b>15.49</b>		<b>123</b>	<b>2288</b>	<b>18.60</b>

As with Elementary schools, Secondary schools in Chuuk are not particularly over-staffed. Inequitable distribution and low rates of certification are the issues that are most likely to contribute to low student achievement. A more equitable distribution of teachers according the formula in **Table 16: Proposed teacher deployment: Secondary Schools** would result in a decrease in numbers of 25 (16.9%). An improvement in the number of teachers with Bachelor’s degrees might have a positive impact on student achievement.

**Table 17: Non-teaching employees; Secondary Schools** shows that there are 128 non-teaching administrative, maintenance and security personnel attached to secondary schools. This number includes 35 cooks, 33 security guards, 26 house parents and dorm managers, 16 maintenance workers and 12 secretaries, registrars and clerks. A further 10 non-teaching staff including 4 house parents and a cafeteria manager are included in the personnel data file under Secondary Central Office.

In some schools, the number of non-teaching staff is greater than the number of teachers. The distribution of non-teaching staff is uneven, with small schools such as Halls Junior High having a disproportionately high number of non-teaching staff and others such as Weno High School having a very low number. As in the case of teachers, it would appear that a formula for the allocation of non-teaching staff has not been applied.

	Number of teachers	Enrolment	Number of non-teaching employees
Chuuk High School	34	543	22
Weno High School	27	406	5
SNHS Tonoas	15	221	17
SNHS Fefen	9	177	9
Faichuk High School	10	223	14
PPO Jr. High	8	71	9
Nomusofo Jr. High	6	57	4
Mortlock High School	11	131	7
Moch Jr. High	6	130	8
Lukeisel Jr. High	6	59	7
Weipat High School	5	163	7
Pattiw Jr. High	3	30	4
Halls Jr. High	5	45	10
Pollap & Tamatam Jr. High	3	32	5

According to data provided by the DOE, the Special Education department employs a total of 59 teachers. Of these, 24 (40.67%) have the minimum qualification of an associate degree, required under the FSM teacher certification policy. Staff at the Special Education department were unable to produce a policy for the assignment of special education teachers to schools.

The DOE has a Staff Development Program with a staff of 6 and an annual budget of about \$500,000. The staff development program funded 48 students at COM Chuuk campus in summer 2009 and 28 students in fall 2009, at a cost of \$77,382.00. A further 46 students completed the Spring 2010 semester at a cost of \$73,371.40. This gives a total staff development expenditure of \$150,753.40 on COM students who were not actually employed by the Department of Education. The Staff Development Program was unable to provide data on teachers enrolled at the COM who are taking classes to upgrade their degrees. A number of college transcripts for individuals were provided.

The Education Improvement Program, with a staff of 26 and a budget of about \$450,000, is responsible for conducting professional development activities for teachers. Other programs, such as Curriculum and Instruction, with a staff of 15, are also responsible for the provision of professional development services. The audit team was unable to determine how many hours of in-service training or professional development had been provided by these departments as no records or reports could be produced. Some training had been conducted by PREL. The departments had not conducted any training for teachers in the National Writing Strategy, as mandated by a FACCSO resolution.

The ECE office, located in downtown Weno, has a professional staff of 26 managing 96 teachers in 48 ECE centres. The ECE staff was unable to provide any details of professional development activities conducted in the last year.

The ECE and Education Improvement Program are responsible for teacher mentoring and classroom support. Part of this role is to conduct teacher observations in classrooms. The ECE department was unable to provide any data on classroom observations. The EIP was able to produce 16 classroom observations conducted in October 2009.

It is evident that some departments of the DOE Weno central office and ECE central office are failing to provide the management, professional development and supervisory services required by the largely untrained teaching workforce. It is also evident that it is counter-productive to employ and assign to a central office 87 professional staff, including 10 area supervisors and 11 teacher mentors, who do not have an opportunity to make regular visits to school sites to manage, supervise and provide mentoring services to teachers. The audit team recommends the decentralization of the majority of the professional and supervisory staff from the DOE Weno central office and ECE central office. The de-centralization of management, supervision and professional development services would also remove the sense of isolation felt by remote schools and make it easier for principals and teachers to access management and advisory support.

The audit team proposes the decentralization of management, supervision, mentoring, family services and curriculum services to five zones; based on the existing senatorial regions. These are;

1. Northern Namoneas: consisting of Weno, Fono, and Piis-Panewu,
2. Southern Namoneas: consisting of Tonoas, Etten, Fefen, Parem, Siis, Totiw, and Uman,
3. Faichuk: consisting of Udot, Eot, Ramanum, Fanapanges, Polle, Paata, Wonei, and Tol,
4. Mortlocks: consisting of Nema, Losap, and Piis-Emmwar, Namoluk, Ettal, Moch, Kuttu, Ta, Satowan, Lukunoch, and Oneop,
5. Northwest Islands: consisting of Nomwin, Fananu, Ruo, Murilo, Onoun, Makur, Onou, Unanu, Piherarh, Houk, Polowat, Tamatam, and Pollap.

The teams could be located at an office attached to a junior or senior high school. It would be preferable if there was a nearby landing strip and if the location had access to the internet through a satellite link similar to those being established under the Pacific Rural Internet Connectivity (RICS) program. Recent developments have allowed Skype video calls to be made from Weno to Moch, and this system could be used to connect the main office in Weno with the regional offices to facilitate regular supervision, professional development, monitoring and reporting.

The decentralized team could be made up of one team leader, two area supervisors, one elementary school teacher mentor, one ECE mentor teacher, one curriculum specialist, one ECE family services worker and one office administrator. The role of the team would be to supervise and provide support services to the schools within the zone, reporting to respective chiefs and the Director of Education on a regular basis. **Table 18: Proposed decentralization of professional services** shows the composition of the proposed teams.

<b>Table 18: Proposed decentralization of professional services</b>							
<b>Zone</b>	<b>Team leader</b>	<b>Area Supervisor</b>	<b>Elementary Mentor Teacher</b>	<b>ECE Mentor Teacher</b>	<b>ECE Family Service Worker</b>	<b>Curriculum specialist</b>	<b>Office administrator</b>
1. Northern Namoneas	1	2	1	1	1	1	1
2. Southern Namoneas	1	2	1	1	1	1	1
3. Faichuk	1	2	1	1	1	1	1
4. Mortlocks	1	2	1	1	1	1	1
5. Northwest Islands	1	2	1	1	1	1	1
<b>Total</b>		<b>40</b>					

This decentralization proposal would reduce the number of professional staff located at the central office in Weno and the downtown ECE office to from 87 to 47. Further reductions could be made by assigning some positions to high schools, such as counsellors and subject specialists. A core professional team located at one office in Weno could concentrate on curriculum, professional development, testing, scholarships and coordination of projects. **Table 19: Proposed restructuring of DOE professional personnel at Weno office** shows a proposed reduction in professional positions from 47 to 20. A minimum academic requirement for all posts should be a bachelor’s degree. The downtown ECE office would no longer be required and would be closed, saving funds expended on rental and facilitation the integration of ECE services into the mainstream education system.

<b>Table 19: Proposed restructuring of DOE professional personnel at Weno office</b>	
<b>Position</b>	<b>Number</b>
Executive Director	1
Deputy Director	1
Chief of Curriculum and instruction	1
Chief of Elementary	1
Chief of Secondary	1
Curriculum specialists	2
Assessment Specialist	1
Special Education Coordinator	1
Special Education Specialists	2
Scholarships coordinator	1
Technical and Vocational Education Coordinator	1
Professional Development Coordinator	1
ECE Program Coordinator	1
ECE Education & Health Supervisor	1
ECE Education & Health specialists	4
<b>Total</b>	<b>20</b>

Further reductions could be made in the existing cadre of non-professional staff, of which there are 87. The purpose of the restructuring would be to align non-professional posts with the reduced number of professional staff based at the central office in Weno, remove duplicate positions and reduce inefficiency. Some staff could be assigned to regional zones as office administrators. Others could be assigned to larger elementary schools to assist with secretarial, data management, maintenance and other duties. **Table 20: Proposed restructuring of DOE non professional personnel at Weno office** shows how non-professional posts could be reduced from 88 to 31. Posts such as computer operator, administrative assistant and administrative officer could be re-assigned to schools or regional offices.

<b>Table 20: Proposed restructuring of DOE non professional personnel at Weno office</b>	
<b>Position</b>	<b>Number</b>
Business manager	1
Accountants	4
Administrative Officers	4
Data specialist	1
Personnel specialist	1
Secretarial	4
ICT technicians	3
Maintenance	1
Warehouse	1
Security	2
Custodian	1
Bus driver	8
<b>Total</b>	<b>32</b>

<b>Criteria 5. Employee evaluations</b>				
	Source	Criteria	Means of Verification	Compliance status
1	State of Truk, Federated States of Micronesia: Policy Manual, Department of Education. Section 407: Performance Evaluation (page 30).	Employees of the Department of Education shall be evaluated annually according to professional standards and criteria established by the Department in accordance with procedures established for the evaluation of all employees of the government of the State of Truk.	Professional standards and evaluation criteria. Annual evaluation reports.	<b>Non Compliance</b> The audit team found no evidence of professional standards or evaluation criteria. Personnel files did not show any annual evaluation reports.
2	State of Truk, Federated States of Micronesia: Policy Manual, Department of Education. Section 407: Performance Evaluation (page 30).	The employee is evaluated by his/her immediate supervisor who forwards the evaluation through administrative channels as prescribed by State Government.	Sample from personnel files.	<b>Non Compliance</b> The audit team found no evidence of employee evaluations by supervisors in personnel files. In interviews, supervisors admitted that they did not conduct evaluations of staff under their supervision.
3	State of Truk, Federated States of Micronesia: Policy Manual, Department of Education. Section 407: Performance Evaluation (page 30).	The employee is afforded a conference with the supervisor prior to forwarding of the evaluative report. The employee is required to sign the report verifying his/her opportunity to review the report. The employee, at his/her discretion, may prepare written comments to be attached to and forwarded with the report.	Sample from personnel files.	<b>Non Compliance</b> The audit team found no evidence of employee evaluations by supervisors in personnel files. In interviews, supervisors reported that they did not conduct evaluations on staff under their supervision.
4	State of Truk, Federated States of Micronesia: Policy Manual, Department of Education. Section 407: Performance Evaluation (page 30).	The Director of the department shall, from time to time, review with supervisory personnel the effectiveness of current evaluation procedures and, when deemed appropriate, arrange for inservice training programs to enhance the knowledge and skills of supervisors in the techniques		<b>Non compliance</b> The audit team found no evidence of a review of the effectiveness of evaluation procedures. Supervisors reported that they had not participated in in-service training programs to enhance their knowledge and skills in techniques of personnel evaluation.

		of personnel evaluation and the effective use of evaluative information.		
5	State of Truk, Federated States of Micronesia: Policy Manual, Department of Education. Section 407: Performance Evaluation (page 30).	The Director, when deemed advisable and, when approved by responsible authority of the government of Truk, will institute revisions of forms and procedures utilized as well as the criteria used for evaluation.		<b>Non compliance</b> The audit team found no evidence of any revisions of forms and procedures used for evaluation.

**Employee evaluations**

The audit team found no evidence of a program of employee evaluation by supervisors. The department does not have professional standards nor does it have any established criteria against which to measure the performance of employees.

The audit team observed that the Education Improvement Program had developed and conducted a pilot test on a program for teacher observation. Sixteen classroom observations were conducted in October 2009. However, the program appeared to have been abandoned and the data entry specialist reported that the electronic data base had been lost. The audit team recommends that the program is revisited, evaluated, revised and expanded to include all teachers, principals and others in offices and school settings.

One performance rating for incremental pay advance was observed. This was completed by the Director and not by the employee’s immediate supervisor.

<b>Criteria 6. Vacancy announcements</b>				
	Source	Criteria	Means of Verification	Compliance status
1	DRAFT Chuuk State Code, Title 9. Public Service System. Chapter One; Public Service System. Subchapter C; Application and Appointments. § 1032. Recruitment and placement.	Except as otherwise provided in this ActChapter and for which appropriations shall have been made, employees shall be recruited by advertisement, for the period and by the media which are appropriate in the circumstances. The advertisement shall include at least the position title, the salary, a brief description of the class, the location of the vacancy or vacancies, the qualification standards required, and the time and place of the examination, if any. The closing date for filing applications shall be clearly stated. On applications which are mailed, the date stamp of the post office on the mailing envelope shall be used to determine compliance with the deadline stated in the advertisement.	Vacancy announcements containing: Position Title. Salary. Description of class. Location. Qualification standards required. Time and place of examinations. Closing date for applications.	<b>Near Compliance</b> Filed vacancy announcements were observed by the audit team at the offices of the Public Service Department. Vacancy notices are posted in the Public Service Department office for a period of ten days. Vacancy notices contained the position title, a brief description of the class, the location of the vacancy, the qualification required, the time and place of the examination and the closing date. Vacancy announcements did not include salary. Some vacancy announcements remained open for extended periods.

**Vacancy announcements**

Vacancy announcements are drafted by the relevant education department’s personnel officer and certified by the Director before being sent to the Public Service personnel office. The Public service personnel office physically posts the announcement on a notice board in a public area within the Public Service personnel office. Announcements are posted for ten days. Some announcements are also broadcast by radio. Applicants are screened by the Public Service personnel office and those who meet the minimum academic qualification are added to a certified list and forwarded to the Director of Education for selection.

Given the geographical distribution of the islands of the State of Chuuk, it is questionable whether this system of advertising vacancies is appropriate and equitable for residents in remote islands and atolls.

A number of anomalies were observed by the audit team.

The most recent vacancy announcement for classroom teachers was a general announcement that did not identify a specific vacancy in a specific school. The announcement was posted on 11/08/07 and remains open, although the announcement is no longer posted on the public notice board. This particular notice has now been open for 34 months. It may be inferred that the recruitment of classroom teachers to specific posts is taking place by recommendation, personal selection or word of mouth rather than through public announcement.

A vacancy announcement posted in July 2009 for an ECE Family Service Coordinator was used to recruit three Family Service Workers. As the post of ECE Family Service Coordinator remains unfilled, there was no opportunity for orientation of these three new Family Service Workers and they are currently unsupervised. A vacancy announcement for a Transportation Supervisor was used to recruit a Machine Repairman. This results in a lack of supervision for bus drivers.

<b>Criteria 7. Competitive examinations</b>				
	Source	Criteria	Means of Verification	Compliance status
1	DRAFT Chuuk State Code, Title 9. Public Service System. Chapter One; Public Service System. Subchapter C; Application and Appointments. §_1033. Examinations.	There shall be competitive examinations, whenever possible, and as determined by the Personnel Officer, to test the relative fitness of candidates for Public Service positions covered by this ActChapter. Examinations may be written, oral, performance, or any combination thereof, and shall provide for ascertaining the physical and educational qualifications, experience, knowledge, and skill of applicants and their relative capacity and fitness for the duties of the positions they seek. All examinations shall be free and, except for promotional examinations, shall be open to all candidates, but with such limitations in regard to health, physical condition, education, training, experience, and other relevant matters as are appropriate to the class for which the examination is given. All examinations shall be under the control of the Personnel Officer. All persons who have passed an examination may be required to take such physical examination as may be specified by the Personnel Officer.	Documentary evidence of competitive examinations.	<b>Non Compliance</b> The audit team found no documentary evidence of competitive examinations in the personnel files examined.

**Competitive examinations**

The audit team examined personnel files at the DOE and at the Public Service personnel office. No evidence was found of candidate questions, interview reports, skills assessment forms or other data related to competitive examinations.

<b>Criteria 8. Probation period</b>				
	Source	Criteria	Means of Verification	Compliance status
1	DRAFT Chuuk State Code, Title 9. Public Service System. Chapter One; Public Service System. Subchapter C; Application and Appointments. § 1038. Probationary service.	(1) Every employee shall successfully serve a probation period (new) before becoming a regular employee. An employee whose services are unsatisfactory during this probation period may be dismissed from the Public Service at any time by the responsible management official. An employee so dismissed shall have no right of appeal; but, if the employee so requests, the Personnel Officer may in his discretion insert the employee's name on the eligible list or lists for other positions in the same class.	Personnel files.	<b>Non Compliance</b> The audit team found no evidence, in the personnel files examined, of employees being required to serve a probationary year or being assessed at the end of a probationary year.

**Probation period**

The personnel action forms for recent employees showed that they were exempt from serving a probationary year. Four recent personnel action forms for appointments to the ECE program were stamped as exempt from serving a probationary year. Personnel specialists were unable to give a reason why these employees were exempted from serving a probationary year.

<b>Criteria 9. Classification of positions</b>				
	Source	Criteria	Means of Verification	Compliance status
1	DRAFT Chuuk State Code, Title 9. Public Service System. Chapter One; Public Service System. Subchapter D; Classification and Compensation. § 1051. Position classification.	All positions subject to the provisions of this Act Chapter shall be classified by the Personnel Officer according to their duties and responsibilities, and shall be grouped into classes on the basis of their similarities in duties, responsibilities, and desirable qualifications. Each class shall be given a title which shall apply to all positions therein, and which shall be used for all personnel, budgetary, and financial purposes. In preparing the position classifications plan, the Personnel Officer shall consult with appropriate management officials. The Personnel Officer may change a position from one class to another when substantial changes have occurred in the duties and responsibilities of the positions. The Personnel Officer shall determine the status of occupants of positions which have been so reclassified.	Position classifications in personnel files.	<b>Non Compliance</b> The audit team found inconsistencies in the naming and classification of positions, the minimum academic requirements and the duties and responsibilities of posts, resulting in anomalies in salary scales.

**Classification of positions**

Not all positions in the DOE appear to be correctly classified. Anomalies include un-coordinated pay scales and a profusion of inconsistent naming of positions in different departments.

Pay scales within the DOE appear to be un-coordinated and unrelated to the duties and responsibilities and minimum academic requirements. Some positions appear to be rated and remunerated more highly than the minimum academic qualification required of the incumbent might suggest. This is particularly evident in ECE. ECE Family Service Coordinator and Family Service Workers are required to have a qualification no higher than a high school diploma, yet their salary range is from \$7,064 to \$7,513. The average salary for a Family Service Worker is \$7,243.60. In a sample of 433 classroom teachers for whom salary data was made available by the DOE, the average salary was \$6,726. Classroom

teachers are required to have a minimum of an associate degree, yet their average salary is 7.14% lower than the average of a Family Service Worker, whose minimum academic qualification is a high school diploma.

Teachers are required to have a minimum qualification of an associate degree. Degree holders are generally remunerated higher than non-degree holders, but there are anomalies. **Table 21: Anomalies in salary payments between degree holders and non degree holders** is an example from one school where four non-degree holders are awarded a higher salary than a degree holder.

<b>Table 21: Anomalies in salary payments between degree holders and non degree holders</b>							
<b>Position</b>	<b>gender</b>	<b>Highest qualification</b>	<b>Date of birth</b>	<b>Date of hire</b>	<b>Grade</b>	<b>Annual salary</b>	
School Principal	Male	None	05/20/55	11/20/78	19/5	307.68	7,996
Classroom Teacher II	Female	None	03/23/58	02/09/92	12/3	190.24	4,684
Classroom Teacher I	Female	None	09/02/69	12/26/04	22/8	437.52	4,210
Classroom Teacher II	Female	AS	04/06/61	08/24/92	22/8	437.52	11,376
Classroom Teacher III	Male	AS	01/15/50		22/8	437.52	13,657
Classroom Teacher I	Male	None	11/29/54	12/14/79	12/5	212.56	5,527
Classroom Teacher I	Male	None	12/09/64	06/29/81	7/1	118.87	3,434
Classroom Teacher I	Male	AS	07/18/79	03/24/98	22/8	437.52	3,609
Classroom Teacher I	Male	None	3/24/086	09/11/08	12/1	170.72	4,439

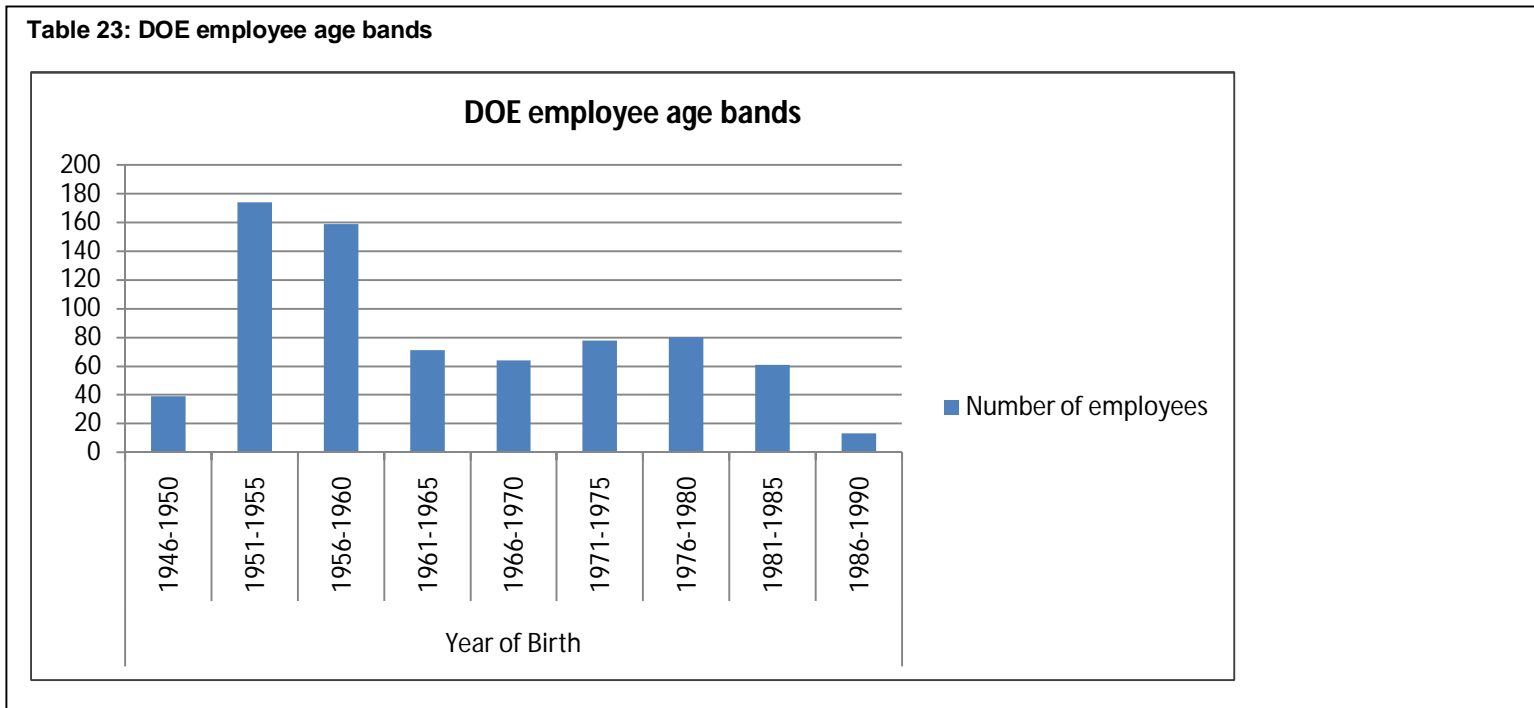
**Table 22: Anomalies in salary payments at Grade 22/8**, shows the wide ranges of salaries awarded to teachers placed at Grade level 22/8, ranging from a low of \$3,995 to a high of \$13,656.

<b>Table 22: Anomalies in salary payments at Grade 22/8</b>						
<b>Position</b>	<b>gender</b>	<b>Highest qualification</b>	<b>Date of birth</b>	<b>Date of hire</b>	<b>Grade</b>	<b>Annual salary</b>
Classroom Teacher	Female	AS	02/17/52	09/09/75	22/8	3,996
Classroom Teacher II	Female	AS	08/20/59	07/01/81	22/8	11,376
Classroom Teacher	Male	AS	03/25/71		22/8	4,439
Classroom Teacher	Female	AA	04/11/54	10/16/94	22/8	4,946
Classroom Teacher	Male	AS	12/15/61	04/17/83	22/8	11,376
Head Teacher	Male	AS	04/14/51	10/20/78	22/8	7,996
Classroom Teacher II	Male	AS	08/27/52	11/20/78	22/8	11,376
Classroom Teacher II	Male	AS	05/30/57	03/13/83	22/8	11,376
Classroom Teacher	Male	AS	01/17/51	11/20/78	22/8	7,064
Classroom Teacher II	Female	AS	11/08/53	08/05/84	22/8	11,376
Classroom Teacher	Female	AS	01/25/55	08/05/84	22/8	6,248
Classroom Teacher II	Female	AS	02/21/73	09/01/96	22/8	11,376
Classroom Teacher	Female	AS	05/16/50	09/05/72	22/8	7,996
Classroom Teacher	Female	AS	10/05/52	09/01/75	22/8	9,343
Classroom Teacher II	Female	AS	03/24/58	10/20/78	22/8	11,376
Classroom Teacher	Female	AS	09/19/59	10/01/79	22/8	6,248
Classroom Teacher I	Female	None	09/02/69	12/26/04	22/8	4,210
Classroom Teacher II	Female	AS	04/06/61	08/24/92	22/8	11,376
Classroom Teacher III	Male	AS	01/15/50		22/8	13,657
Classroom Teacher II	Female	AS	04/06/70	10/01/02	22/8	11,376

There appears to have been an uncoordinated proliferation of position titles. This is particularly evident in the ECE department, where there are positions with the titles executive secretary, maintenance support supervisor, maintenance aide, office aide, property and equipment specialist and machine repairman. None of these positions exists at the central education office.

<b>Criteria 10. Mandatory retirement</b>				
	Source	Criteria	Means of Verification	Compliance status
1	DRAFT Chuuk State Code, Title 9. Public Service System. Chapter Five; Mandatory Retirement. § 1202. Mandatory retirement.	(1) Any employee of the Chuuk State Public Service System, upon reaching the age of <del>sixty</del> (60) years, shall retire from the Public Service within <del>thirty</del> (30) days from the attainment of the age of <del>sixty</del> (60) years.	Data. Personnel files.	<b>Non Compliance</b> Data indicates that the DOE currently retains at least 42 employees who have reached or exceeded the statutory retirement age of 60 years plus 30 days.

At the time of writing, the DOE retained at least 42 employees who had reached the statutory retirement age of 60 years plus 30 days. **Table 23: DOE employee age bands** shows the number of employees, whose age is recorded in DOE data base, arranged in age bands based on their year of birth.



The age profile of employees is heavily weighted towards employees born before 1956. Of 739 employees whose date of birth is recorded in the DOE's data, 372 (50.3%) have already or will reach retirement age within the next ten years. 25% will reach retirement age in the next five years. On average, the education system will lose 37 employees (5% of the current workforce) per year for the next ten years through retirement. There are currently approximately 75 twenty to twenty nine year olds in the system, representing ten years of incoming graduates, or 7.5 new graduates per year, a shortfall of about 30 per year.

The DOE recognizes that there is an ageing workforce and few new graduates but has proposed, in its Sector '11 and SEG 10 integrated plan, to correct the issue by re-employing retired teachers. This approach will not address the long-term problem of an ageing workforce. A more sustainable approach would be to recruit more new graduates or attract existing graduates. Graduates who have associate degrees or higher levels of qualification are not currently being actively recruited to the education system. This may be due to a number of factors, such as poor salary or lack of opportunities for promotion. However, it may also be the case that over-age, unqualified and uncertified incumbents are holding positions that could be filled by new graduates. The available pool of new graduates is a potential resource that could be used to good effect to stimulate and revitalize the education system in Chuuk.

It is recommended that the DOE enforce the current mandatory retirement age and encourage the induction of new graduates to the workforce.

<b>Criteria 11. Teacher qualifications</b>				
	Source	Criteria	Means of Verification	Compliance status
1	FSM Teacher Certification Policy (As Amended 2008) <u>Section IV, 1: Educational Backgrounds:</u> (pg.2)	Any person applying for a teaching position or is currently teaching in any FSM School System must possess any of the following qualifications: a.) Associate of arts (AA) degree or an Associate of Science (AS) degree to be qualified to teach at ECE-8 level schools.	Personnel data confirms that all Elementary School Teachers possess the necessary qualifications. A sample number of personnel files contain copies of the relevant degrees.	<b>Near compliance</b> Documents confirm that 169 (19%) teachers have met the basic certification requirements and are currently certified to teach in the FSM.  Data confirms that of a total of 901 teachers, 478 (53%) possess an Associate or Bachelor's degree.
2	FSM Teacher Certification Policy (As Amended 2008) <u>Section IV, 1: Educational Backgrounds:</u> (pg.2)	Any person applying for a teaching position or is currently teaching in any FSM School System must possess any of the following qualifications: b.) Bachelor of Arts (BA) degree or a Bachelor of Science (BS) degree to be qualified to teach at 9-12 level schools.	Data confirms that all Junior High and High School Teachers possess the necessary qualifications. A sample number of personnel files contain copies of the relevant degrees.	<b>Near compliance</b> Data confirms that of 162 teachers, including classroom teachers, vocational education teachers and school principals, 22 (13.58%) possess the minimum academic requirement of a Bachelor's degree.

Teacher certification data indicates that only 19% of practicing teachers are actually certified to teach in the FSM. 81% of practicing teachers either do not have the necessary academic qualifications, have not passed the NSTT or are not following an approved course of training leading towards certification.

<b>Criteria 12. National Standardized Teachers' Test (NSTT)</b>				
1	FSM Teacher Certification Policy (As Amended 2008) <u>Section IV, 2:</u> National Standardized Tests for Teachers (NSTT) (pg.2)	There shall be a NSTT which shall be administered by the States' DOE. The scoring, analysis and reporting shall be performed within ten days after testing by the NDOE during the month of January and June of each year.	2009 and 2010 NSTT data	<b>Compliance</b> Data confirms that the NSTT was correctly administered in 2009 and 2010. 901 teachers took the NSTT tests and 169 (19%) teachers passed the test.
2	FSM Teacher Certification Policy (As Amended 2008) <u>Section IV, 2:</u> National Standardized Tests for Teachers (NSTT) (pg.2)	Any person applying for a teaching position or who is currently teaching shall be required to pass the NSTT or its succeeding version to be qualified under this section.	2009 and 2010 NSTT data	<b>Non Compliance</b> NSTT data indicates that 732 (81%) teachers currently teaching have not passed the NSTT. The DOE continues to recruit new teachers without requiring them to have passed the NSTT.
3	FSM Teacher Certification Policy (As Amended 2008) <u>Section IV, 4:</u> Class and types of Certifications (pg.3)	Teacher certification in the Federated States of Micronesia shall be of four (4) types: A.) Basic Certificates: This certificate shall be issued to teachers who possess AA/AS degree and above and passed NSTT Content Competency Component Math, Science and Cloze Test. Such certificates shall be renewable after every four (4) years. B.) Advanced Certificates: This shall be issued to teachers who possess AA/AS degree and above and passed NSTT Content Competency Component and Teaching Competency Component. C.) Special Certificates: This certificate shall be issued to all	Teacher Certification data confirms that the correct Certificates have been applied for and issued.	<b>Near Compliance</b> The Director of Education has requested the issuance of 169 Basic Certificates (19% of the 901 total). There have been no requests for Advanced, Special or Provisional Certificates.

		<p>non-degree career and technical education (CTE) teachers that passed the standardized CTE aptitude tests and met requirements developed by each respective State DOE.</p> <p>D.) Provisional Certificates: The certificate shall be issued only to teachers hired on contract, or short term basis or volunteers teaching in any FSM schools or applying to teach in the FSM that possess valid teacher licenses or possess AA/AS degrees or their equivalents with transcripts from their last attended IHE.</p>		
4	<p>FSM Teacher Certification Policy (As Amended 2008)  <u>Section IV, 5:</u>                      Issuance of Certifications (pg.4)</p>	<p>The offices of the Directors of Education for each State shall ensure that teachers fall within the provision of this policy are qualified accordingly. All certificates shall be issued upon respective State Director's request only.</p>	<p>Written request from State Director of Education.</p>	<p><b>Non Compliance</b>                      The State Director of Education has not issued written requests for the certification of teachers in Chuuk. Basic Certificates have been issued to 19% of teachers based on raw data forwarded by the DOE but without the request of the State Director.</p>

<b>Criteria 13. Individual Certification Plans</b>				
	Source	Criteria	Means of Verification	Compliance status
1	FACSSO Resolution #FRO9-05	Whereas, a teacher must have achieved a National certification or be making adequate progress toward certification as measured through an individual certification plan approved by the Secretary.	Inspection of Individual Certification Plans (Form A) for all current teachers who are not certified.	<b>Non Compliance</b> The Staff Development Program was unable to provide evidence of individual certification plans for uncertified teachers who are making adequate progress towards certification

**Individual Certification Plans**

The DOE Staff Development Program was able to provide transcripts from the College of Micronesia for employees who had completed components of a variety of associate degree courses. However, these did not indicate the number of teachers actually currently enrolled in associated degree courses. The DOE Staff Development Program was unable to provide any of the data on non-certified teachers contained in Form A, an example of which is shown below, as required under the FSM Teacher Certification Policy (2008).

FSM Teacher Degree Attainment Plan  
National Department of Education  
Federated States of Micronesia  
School Year 2009-2010

**Form A**

- A. Full Name: \_\_\_\_\_ State: \_\_\_\_\_
- B. School: \_\_\_\_\_
- C. Highest grade completed: \_\_\_\_\_ Institution: \_\_\_\_\_ Date Attended: \_\_\_\_\_
- D. Degree semester plan begins: \_\_\_\_\_  
Month-Year Month-Year
- F. Required Courses:                      Number:                      Credits
- 1.
  - 2.
  - 3.
  - 4.
  - 5.
  - 6.
- G. Training Coordinator Request: \_\_\_\_\_  
Note:
- H. Principals Approval: \_\_\_\_\_  
Note:
- I. Director's Approval: \_\_\_\_\_  
Note:
- J. IHE verification of acceptance: \_\_\_\_\_
- K. Trainee agrees to all IHE and states' requirements and conditions pertaining success and failures: \_\_\_\_\_  
\_\_\_\_\_  
Signature    Date

<b>Criteria 14. ECE Written personnel policies</b>				
	Source	Criteria	Means of Verification	Compliance status
1	Administration on Children, Youth and Families. Head Start Program and Regulations Guidance for Parts 1304 and 1308. Section 1303.31: Personnel policies (Pages 7 & 8)	Grantee and delegate agencies must establish and implement written personnel policies for staff that are approved by the Policy Council or Policy Committee and that are made available to all grantee and delegate agency staff. At a minimum, such policies must include:	Policy documents	<b>Near Compliance</b> The audit team found no evidence of written personnel policies.
2		(1) Description of each staff position, addressing, as appropriate, roles and responsibilities, relevant qualifications, salary range, and employee benefits.	Personnel files Personnel data Policy documents	<b>Near Compliance</b> Position descriptions for 25 staff positions are available. Position Descriptions for at least five positions are not available. The titles of some Position Descriptions differ from the titles listed in the ECE personnel data file.
3		(2) A description of the procedures for recruitment, selection and termination.	Policy documents Job vacancies and announcements	<b>Near Compliance</b> The audit team found no evidence of policy documents regarding recruitment, selection and termination. ECE recruitment is being conducted mostly under State Public Service system rules.
4		(3) Standards of conduct.	Policy documents Personnel files	<b>Non Compliance</b> The audit team found no evidence of standards of conduct.
5		(4) Descriptions for providing staff and volunteers with opportunities for training, development, and advancement.	Immediate supervisors recommendations for promotion, termination, pay raise.	<b>Near Compliance</b> The recruiting of volunteers, training, staff development, and advancement opportunities are made through the recommendation of immediate supervisors like principals, program coordinators, etc.

6		(5) A description of the procedures for conducting staff performance appraisals.	Personnel policy documents	<b>Non Compliance</b> The audit team found no evidence of policy documents describing procedures for conducting staff performance appraisals.
7		(6) Assurances that the program is an equal opportunity employer and does not discriminate on the basis of gender, race, ethnicity, religion or disability	Personnel Listing	<b>Non Compliance</b> From the 85 ECE teachers, there are 62 females (72.94%) and 23 males (27.06%).
8		(7) A description of employee-management relations procedures, including those for managing employee grievances and adverse actions.	Personnel policy documents	<b>Non Compliance</b> The audit team found no evidence of policy documents describing management relations procedures, including those for managing employee grievances and adverse actions.

**ECE Written personnel policy**

Early Childhood Education in Chuuk State was conducted under the Head Start program until 2005. Head Start policies and procedures have not been revised. It is recommended that the Chuuk State DOE work with the National Department of Education to revise and update its ECE policy and procedures.

Position descriptions for five positions, AO III, Transition Specialist, Transition Aide, Family Service Worker and Dental nurse, could not be found.

The position titles of Head Teacher and Teacher Aide were titled Classroom Teacher I and Classroom Teacher in the personnel data file. The position descriptions for Head Teacher and Teacher Aide, as shown below, do not require the minimum qualification of an Associate Degree as required under the FSM Teacher Certification Policy (2008).

Early Childhood Education Program  
Job Description

Position/Title: Head Teacher

Duties and Responsibilities:

1. Develops lesson plan in accordance with the objectives of the Early Childhood Education Program and the needs of the Children in the community.
2. Evaluates the progress and performance of pupils met with parents of pupils in the community.
3. Upon approval implements lesson plans in a classroom environment to pupils in the community.
4. Improve lesson plans in accordance with changing needs of children in the community.
5. Conducts home visit to discuss problems and progress with the parents of the pupils not less than three times in one year.
6. Coordinates and supervisor the teacher aide and the cook.
7. Asses the needs of the children and develop lesson plan for each one of the children based on the needs.
8. Implement all components plan in the center or in the community for the children.
9. Plans and supervise field trips for the pupils.
10. Reports to and advise the Early Childhood Education Program center coordinator regarding program policies and issues.

**Qualification:**

Graduate from high school and at least two years experience in teaching pre-school children.

**Salary:**

The beginning salary for the position shall be on pay level 5 step 1. \$2.50 per hour or \$ 192.00 bi/wkly , and \$3,840.00 per annum.

Early Childhood Education Program  
Job Description

Position/Title: Teacher Aide

Duties and Responsibilities:

1. Assist the Head Teacher and cook in developing lesson plan and implementation to such plan
2. Assist the Head Teacher in conducting parent workshop on child growth and development and in nutrition and health.
3. Assist the Head Teacher to evaluate the children's daily activities and discuss with the result of such evaluation.
4. Assist the center staff to supervise field trip for the children.
5. Conduct home visit to discuss the children needs and problems.
6. Assist the Head Teacher in preparation of report which are required to e submitted to the Early Childhood Education Program.
7. Carry out all the duties and responsibilities of the teacher when she/he I absence of sickness.
8. Assist the Head Teacher to implement the individualized plan for each child for their need.
9. Perform other related duties as assigned.

Qualification:

Graduate from high school with two years experience in teaching pre-school children.

Salary:

Teacher Aide shall be placed on pay level 4 step 1 \$2.04 per hour or \$163.20 bi/wkly, and \$3, 364.00 per annum.

<b>Criteria 15. ECE Staff recruitment and selection procedures</b>				
	Source	Criteria	Means of Verification	Compliance status
1	Administration on Children, Youth and Families. Head Start Program and Regulations Guidance for Parts 1304 and 1308. Section 1303.31: Personnel policies (Page 8)	(1) Before an employee is hired, grantee or delegate agencies must conduct:  (i) an interview with the applicant,	Personnel Files	<b>Non Compliance</b> The audit team found no evidence of applicant interviews in personnel files.
2		(ii) A verification of personal and employment references,	Personnel Files	<b>Non Compliance</b> The audit team found no evidence of verification of personal and employment references in personnel files.
3		(iii) A State or national criminal record check, as required by State law or administrative requirement. If it is not feasible to obtain a criminal record check prior to hiring, an employee must not be considered permanent until such a check has been completed.	Personnel Files	<b>Non Compliance</b> The audit team found no evidence of criminal record checks in personnel files.

<b>Criteria 16. ECE Staff background checks</b>				
	Source	Criteria	Means of Verification	Compliance status
1	Administration on Children, Youth and Families. Head Start Program and Regulations Guidance for Parts 1304 and 1308. Section 1303.31: Personnel policies (Page 8)	(2) Grantee and delegate agencies must require that all current and prospective employees sign a declaration to employment that lists: (i) All pending and prior criminal arrests and charges related to child sexual abuse and their disposition,	Personnel Files	<b>Non Compliance</b> The audit team found no evidence of signed declarations in personnel files.
2		(ii) Convictions related to other forms of child abuse and neglect,	Personnel Files	<b>Non Compliance</b> The audit team found no evidence of signed declarations in personnel files.
3		(iii) All convictions of violent felonies.	Personnel Files	<b>Non Compliance</b> The audit team found no evidence of signed declarations in personnel files.
4		Grantee and delegate agencies must review each application for employment individually in order to assess the relevancy of an arrest, a pending criminal charge, or a conviction.	Personnel Files	<b>Non Compliance</b> The audit team found no evidence signed declarations nor of the review of pending criminal charges or convictions in personnel files. ECE management was unable to provide the audit team with any policy or procedures related to child protection procedures.

<b>Criteria 17. ECE Probationary period</b>				
	Source	Criteria	Means of Verification	Compliance status
1	Administration on Children, Youth and Families. Head Start Program and Regulations Guidance for Parts 1304 and 1308. Section 1303.31: Personnel policies (Page 8)	The policies governing the recruitment and selection of staff must provide for a probationary period for all new employees that allows time to monitor employees that allows time to monitor employee performance and to examine and act on the results of the criminal record checks discussed in paragraph (b)(1).	ECE Personnel and Data File  Little or no evidence of consistency in monitoring employee probationary and performance in consideration of time served.	<b>Non compliance</b> The audit team found that three recently recruited employees had been exempted from a probationary period. The audit team found no evidence of performance evaluations or monitoring in personnel files.

<b>Criteria 18. ECE Reporting child abuse or sexual abuse</b>				
	Source	Criteria	Means of Verification	Compliance status
1	Administration on Children, Youth and Families. Head Start Program and Regulations Guidance for Parts 1304 and 1308. Section 1303.31: Personnel policies (Page 8)	Grantee and delegate agencies must develop a plan for responding to suspected or known child abuse as defined in 45 CFR 1304.1-2 (b) whether it occurs inside or outside of the program.	Written plan	<b>Non Compliance</b> The audit team found no evidence of a plan for responding to suspected or known child abuse.

<b>Criteria 19. ECE Staffing patterns</b>				
	Source	Criteria	Means of Verification	Compliance status
1	Administration on Children, Youth and Families. Head Start Program and Regulations Guidance for Parts 1304 and 1308. Subpart B 1306.20 Program staffing patterns. (page 248)	Grantees operating center-based program options must employ two paid staff persons (a teacher and a teacher aide or two teachers) for each class. Wherever possible, there should be a third person in the classroom who is a volunteer.	Data File Personnel Listing	<b>Near Compliance</b> 41 of the 45 ECE centers have at least two teachers. According to DOE data, Satowan, Sapuk and Paata ECE centres have one teacher while Fananu does not have any teachers.
2		Head Start programs must use volunteers to the fullest extent possible. Head Start grantees must develop and implement a system to actively recruit, train and utilize volunteers in the program.	Parental Involvement workshops conducted with PREL	<b>Non Compliance</b> The audit team found no evidence of the development and implementation of a system to actively recruit, train and utilize volunteers in the program.
3		For classes serving predominantly four and five year old children, the average class size of that group of classes must be between 15 and 17 children. A double session class for four and five year old children may have no more than 17 children enrolled.	Enrolment data.	<b>Non Compliance</b> The average teacher:student ratio is 1:11.6. However, to comply with staffing requirements the ratio should be in the region of 1:8.5.

**ECE Staffing Patterns**

The DOE was unable to provide enrolment data for individual ECE centres. DOE data indicates that there are 45 ECE centres staffed by 85 teachers giving a teacher:student ratio of 1:11.6.

Recent data received by the NDOE is shown in **Table 24: ECE enrolment.** , indicates that three centers, Oneisom, Mwen Fefan and SDA Paata do not have any teachers and Oneop has only one. some classes have more than 17 students enrolled.

<b>Table 24: ECE enrolment</b>						
<b>ECE Center Name</b>	<b>Count</b>	<b>Teachers</b>		<b>ECE Center Name</b>	<b>Count</b>	<b>Teachers</b>
Downtown Center	22	4		Oneop Center	21	1
Enin Center	25	2		Onoun Center	25	2
Ettal Center	16	2		Paata Nukaf Center	24	1
Fason Center	25	2		Penia & Peniesene Center	15	2
Houk Center	21	2		Piis Paneu Center	25	3
Inaka Center	25	2		Piisemwar Center	20	2
Kuchuwa Center	22	2		Pollap Center	20	2
Kuttu Center	22	2		Polowat Center	14	2
Lekinioch Center	24	2		Roro Center	25	2
Manaio Center	25	2		Sapore Center	23	2
Mechitiw Center	25	3		Sapota Uman Center	25	2
Moch Center	18	2		Sapou Uman Center	21	2
Mwan Center	25	3		Sapuk Center	25	3
Mwanukun Uman Center	25	2		Satowan Center	24	2
Mwen Fefan Center	25	0		SDA Paata Elementary Sch	3	0
Namoluk Center	20	2		Siis Center	20	2
Neauo Center	25	3		Tamatam Center	13	2
Nechocho Center	20	2		Tunnuk Center	25	2
Nema Center	24	2		Udot Mwanitiw Center	25	2
Nepukos Center	25	3		Udot Wonip Center	25	2
Nomwin Center	21	2		UFO Center	25	2
Nukuno Center	24	2		Wonip Tolensom Center	25	2
Oneisom Center	21	0				
			<b>Ratio</b>			
Total	<b>1044</b>	<b>90</b>	<b>1:11</b>			

**Table 24: ECE enrolment** indicates that three centers, Oneisom, Mwen Fefan and SDA Paata do not have any teachers and Oneop has only one. 40 of the 45 centres have more than 17 students enrolled. Only 4 centres have the correct ratio of teachers to student enrolment.

<b>Criteria 20. ECE Personnel Training</b>				
	Source	Criteria	Means of Verification	Compliance status
1	Administration on Children, Youth and Families. Head Start Program and Regulations Guidance for Parts 1304 and 1308. Subpart B 1306.23 Training. (page 248)	Head Start grantees must provide pre-service training opportunities to program staff and volunteers to assist them in acquiring and increasing the knowledge and skills they need to fulfil their job responsibilities. This training must be directed towards improving the ability of staff and volunteers to deliver services required by Head Start regulations and policies.	Records and reports	<b>Non Compliance</b> The audit team found no training records or reports.

<b>Criteria 21. ECE Personnel Records</b>				
	Source	Criteria	Means of Verification	Compliance status
1	Chuuk Organization for Community Action. Head Start program record keeping and reporting system.	Records regarding employees of the agency are confidentially kept with the personnel specialist. Hiring of new employees requires such procedures as stated in the Agency Personnel Policy.	Agency Personnel Policy. Head Start Performance Standards on Record Keeping and Reporting System	<b>Non Compliance</b> Personnel records are kept by the Chuuk Public Service personnel office and by the ECE personnel specialist.
2		All personnel records are subjected to the Agency's confidentiality policy.	Confidentiality Policy	<b>Non Compliance</b> The audit team found no evidence of a confidentiality policy.
3		Updating of individual employee's personnel records is done twice a year as required by Personnel Policy.	Personnel records	<b>Non Compliance</b> Personnel Files show no evidence of periodic updates on employee records.

<b>Criteria 22. ECE Personnel Policy</b>				
	Source	Criteria	Means of Verification	Compliance status
1	Chuuk Organization for Community Action. Head Start program record keeping and reporting system.	Personnel files include but are not limited to the following: 1. Application for employment	Personnel Files	<b>Non Compliance</b> Applications were not found in any personnel files examined by the audit team.
2		2. Verification of criminal arrest and child abuse	Personnel Files	<b>Non Compliance</b> Verifications were not found in any personnel files examined by the audit team.
3		3. Personnel action of hiring, wage increase, reprimandation, termination	Personnel Files	<b>Compliance</b> Personnel actions were found in all personnel files examined by the audit team.
4		4. Leave application.	Personnel Files	<b>Non Compliance</b> Leave applications were not found in any personnel files examined by the audit team.
5		6. Employee training record.	Personnel Files	<b>Non Compliance</b> Employee training records were not found in any personnel files examined by the audit team.
6		7. Drug free policy.	Personnel Files	<b>Non Compliance</b> References to a drug-free policy were not found in any personnel files examined by the audit team.
7		8. Letter of hiring.	Personnel Files	<b>Non Compliance</b> Letters of hiring were not found in any personnel files examined by the audit team.
8		9. Insurance for individual employee.	Personnel Files	<b>Non Compliance</b> Insurance records were not found in any personnel files examined by the audit team.
10		10. Position description.	Personnel Files	<b>Non Compliance</b> Position descriptions were not found in any personnel files examined by the audit team.

12		12. Personnel manual or policy.	Personnel Files	<p><b>Non Compliance</b>                  Personnel manuals or policies were not found in any personnel files examined by the audit team.</p>
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