



**Continuous Improvement  
Focused Monitoring Report  
for**

**CONVERSE COUNTY SCHOOL DISTRICT #2**

**March 22 – 26, 2010**

**Special Programs Unit  
320 West Main Street  
Riverton, WY 82501  
[www.k12.wy.us](http://www.k12.wy.us)**

**Wyoming Department of Education  
Dr. Jim McBride, Superintendent of Public Instruction**

# Wyoming Department of Education Continuous Improvement – Focused Monitoring Report

**Converse County School District #2**

**School Year: 2009 – 2010**

**Date of On-Site Review: March 22 – 26, 2010**

## Introduction

The Individuals with Disabilities Education Improvement Act of 2004 (IDEA 2004), Part B, Section 300.600(a) of the Federal Regulations states: *The state must monitor the implementation of this part, enforce this part in accordance with §300.604 (a)(1) and (a)(3), (b)(2)(i) and (b)(2)(v), and (c)(2), and annually report on performance under this part. (b) The primary focus of the State's monitoring activities must be on: (1) improving educational results and functional outcomes for all children with disabilities; and (2) ensuring that public agencies meet the program requirements under Part B of the Act, with a particular emphasis on those requirements that are most closely related to improving educational results for children with disabilities.*

## Process

### A. Performance Indicator Selection

Consistent with the requirements established in Federal Regulations §§300.600 through 300.604, the Wyoming Department of Education (WDE) focuses on those elements of information and data that most directly relate to or influence student performance, educational results and functional outcomes for children with disabilities.

The General Supervision Stakeholder Group<sup>1</sup> worked with the WDE Special Programs Unit in the fall of 2009 to set the priority indicators and scoring system to be used in determining which districts would be selected for on-site monitoring. IDEA 2004 places a strong emphasis on positive educational results and functional outcomes for students with disabilities ages three through 21. This factor greatly influenced the selection of three key indicators of student performance from the State's Performance Plan as priorities for the Continuous Improvement – Focused Monitoring (CIFM) process. The ultimate goal of the CIFM process is to promote systems change which will positively influence educational results and functional outcomes for students with disabilities.

Districts were selected for on-site monitoring through the application of a formula applied to all 48 districts' data using four variables. These variables are taken directly from Indicators 2, 3C, and 5 of the State Performance Plan (SPP), which can be viewed in its entirety at [www.k12.wy.us](http://www.k12.wy.us). With Stakeholder Group input, the WDE slightly narrowed its focus in each of the indicator areas to include the following pieces of data in its selection formula:

---

<sup>1</sup> The Focused Monitoring Stakeholder Group is comprised of principals, special education directors, teachers, parents, advocates and superintendents from across the state.

- Indicator 2: combined dropout rate for students with disabilities over the past three years of available data (05-06, 06-07, and 07-08)
- Indicator 3 C: 2009 PAWS proficiency rates for students with disabilities in 3<sup>rd</sup> grade reading and 8<sup>th</sup> grade mathematics
- Indicator 5: 2008 – 2009 combined rate of separate classroom (SC) and separate facility (SF) placements

For each district, the WDE Special Programs Unit calculated a total score using this formula. The Department then selected districts for on-site CIFM visits using the process described below in subsection B.

## B. Individual District Selection

Districts were divided into four population groups based on overall enrollment numbers:

- Large Districts – more than 1,950 students
- Medium Districts – 860 to 1,949 students
- Small Districts – 500 to 859 students
- Extra Small Districts – 499 or fewer students

Converse County School District # 2 (CCSD # 2) is considered a small school district and reported a special education population of 128 students on its 2009 WDE-427 report. Thus, the district's 2008 – 2009 special education data were ranked against data from all other small districts for the same time period. The two lowest performers in each population group were selected for an on-site monitoring visit using the comparison to state rates found below. Districts who received on-site monitoring visits during the 2008 – 2009 school year were excluded from consideration for monitoring this year in order to give them adequate time to implement their Corrective Action Plans:

SPP Indicators	CCSD #2 Rate	Overall State Rate excluding CCSD #2
Ind. 2: Combined Dropout Rate	10.81%	9.23%
Ind. 3C: 3 <sup>rd</sup> Gr. Reading Proficiency	10.00%	29.44%
Ind. 3C: 8 <sup>th</sup> Gr. Math Proficiency	16.67%	26.37%
Ind. 5: Combined SC and SF rates	18.60%	11.60%

In terms of the variables that are included in the weighted formula, Converse #2's data did not compare favorably to the state overall on variables composing the WDE's selection formula. However, the district did outperform other similar-sized Wyoming school districts in some areas. For example, Converse #2's 2009 PAWS proficiency rate for 3<sup>rd</sup> grade reading was better than four other districts in this cohort, and the district's 8<sup>th</sup> grade math proficiency rate exceeded comparable rates of five similar-sized districts. In the end, when all variables were combined and compared to other districts in the same population group, CCSD #2's score was one of the two lowest of eligible districts, and it was selected for an on-site monitoring visit.

It should be noted that the district's performance on these key indicators is not direct evidence of noncompliance. After a district has been selected for on-site monitoring, the WDE then fully analyzes district data to determine potential areas of noncompliance that may account for the district's performance. For example, if a school had low PAWS proficiency rates in mathematics

and low rates of regular class placement, the question of whether or not children had access to the general curriculum might be reviewed. A finding of noncompliance can only be made through the WDE's CIFM system if multiple pieces of objective information point to the same conclusion.

## **Focused Monitoring Conditions for Converse County School District #2**

In preparation for the on-site monitoring visit, WDE reviewed the district's most recent and trend data from a variety of sources including the WDE-425 (December 1) and WDE-427 (July 1) data collections, assessment data (PAWS and PAWS-ALT), stable and risk-based self-assessment data, and discipline data from the WDE-636. The data led the WDE to create hypotheses in three areas: 1) Evaluation Procedures; 2) FAPE – Educational Benefit; and 3) Least Restrictive Environment.

1. **FAPE – Evaluation Procedures and Eligibility Determinations** This hypothesis was developed due to several anomalies noted in the district's population of students in certain disability categories.
2. **FAPE – Educational Benefit** This hypothesis was developed due to the district's comparatively low PAWS proficiency rates for students with disabilities.
3. **FAPE – Least Restrictive Environment** This hypothesis was formulated due to the district's comparatively high percentage of students with disabilities placed in the Separate Classroom settings.

Details regarding the development of each hypothesis and information on how the WDE determined its samples for each are found below in the introduction to each finding area.

In addition to the three hypotheses chosen for on-site focused monitoring, the WDE also monitored other areas for IDEA compliance through a procedural compliance review of each file reviewed during testing of the aforementioned hypotheses. Results of the review are included with this report in Appendix A. Appendix B contains the results of a parent survey that was conducted in the district during a four-week window that included the dates of the on-site monitoring visit.

## **Results of On-Site Monitoring for Converse #2**

These areas were monitored on-site through a focused file review, and staff interviews. Each area is defined by statute, summarized by evidence gathered on-site, and a finding of noncompliance listed as applicable.

### **Area 1: Evaluation Procedures and Eligibility Determinations**

#### **A. Citation**

§ 300.304 Evaluation procedures.

*(b) Conduct of evaluation. In conducting the evaluation, the public agency must-*

*(1) Use a variety of assessment tools and strategies to gather relevant functional, developmental, and academic information about the child, including information provided by the parent, that may assist in determining-*

- (i) Whether the child is a child with a disability under § 300.8 and
- (ii) The content of the child's IEP, including information related to enabling the child to be involved in and progress in the general education curriculum (or for a preschool child, to participate in appropriate activities);
- (2) Not use any single measure or assessment as the sole criterion for determining whether a child is a child with a disability and for determining an appropriate educational program for the child; and
- (3) Use technically sound instruments that may assess the relative contribution of cognitive and behavioral factors, in addition to physical or developmental factors.
- (4) The child is assessed in all areas related to the suspected disability, including, if appropriate, health, vision, hearing, social and emotional status, general intelligence, academic performance, communicative status, and motor abilities;
- (6) In evaluating each child with a disability under §§ 300.304 through 330.306, the evaluation is sufficiently comprehensive to identify all of the child's special education and related services needs, whether or not commonly linked to the disability category in which the child has been classified.
- (7) Assessment tools and strategies that provide relevant information that directly assists persons in determining the educational needs of the child are provided.

§ 300.306 Determination of eligibility.

(a) General. Upon completion of the administration of assessments and other evaluation measures-

- (1) A group of qualified professionals and the parent of the child determines whether the child is a child with a disability, as defined in §300.8, in accordance with paragraph (b) of this section and the educational needs of the child; and

(b) Special rule for eligibility determination. A child must not be determined to be a child with a disability under this part-

- (1) If the determinant factor for that determination is-
  - (i) Lack of appropriate instruction in reading,
  - (ii) Lack of appropriate instruction in math; or
  - (iii) Limited English proficiency; and
- (2) If the child does not otherwise meet the eligibility criteria under §300.8(a).

**B. Evidence**

**1. Data**

As noted above in the introduction of this report, the WDE noted that overall identification rate of students with disabilities at 12.55% is somewhat lower than the state rate of 14.06 % and the rates are quite variable within specific disability categories. However, within the district's WDE-425 and WDE-427 data for certain disability categories, the WDE noted several anomalies. For example:

- Five Converse #2 students with a Developmental Delay (DD) were reportedly receiving extensive services not typically associated with students in this category [i.e., Assistive Technology (AT), Occupational Therapy (OT), Physical Therapy (PT)].
- Six students in primary grades who were eligible under the Speech Language (SL) disability category were also receiving the same kinds of extensive services not typically associated with students in this category (AT, OT, PT).
- Two students in primary grades were reportedly eligible under the SL criteria, yet the students were not receiving speech services or language services.

- Three students were listed on the 2008 or 2009 WDE-636 discipline report and were receiving Counseling (CS), Psychological Services (PS), and/or Social Work (SW) services on their IEPs. However, none of these three students were reported under the Emotional Disability (ED) category.

The WDE hypothesized that some of these students may not have been evaluated in all areas of suspected disability, may have lacked necessary components in their evaluations, or may not have met the eligibility criteria for the category in which they were reportedly eligible.

## 2. File Review

Using the fifteen<sup>2</sup> students described in Section B1 above as its purposeful sample, the WDE began its exploration of this hypothesis by reviewing these students' special education files in order to find out more about the evaluation procedures followed in each student's case. Through the file review process, ten students were removed from the sample for the following reasons:

- Three student files contained comprehensive evaluations leaving no reason to suspect errors in the evaluation process or potential eligibility in other areas.
- Two students met eligibility in more than one disability category.
- Two students returned to the regular education program after being found no longer eligible for special education.
- Two students moved or transferred out of the district.
- One student was undergoing a new evaluation at the time of the monitoring visit.

This reduction left five students remaining from the original sample. However, an additional student<sup>3</sup> was added to this sample, bringing the total subsample to six students. Each of these files exhibited one or more of the following characteristics, prompting the WDE to further examine these student's situations:

- 3 of 6 files contained clear reason to suspect disability in one or more areas not assessed.
- 1 of the 6 files contained a psychological evaluation report with relevant recommendations that did not appear to be considered by the team.
- 1 of 6 files indicated that additional assessments were apparently conducted in the fall of 2009, but no corresponding reports could be found in the file.
- 3 of 6 files either failed to address exclusionary factors or failed to rule them out adequately.
- 2 of 6 files contained evidence that one or more required factors and/or exclusionary factors were not checked off on the eligibility determination form.
- 1 of the 6 files contained conflicting eligibility statements.

---

<sup>2</sup> Although there appear to be sixteen students included in the breakdown under Section B1, one of the students was included among the students in both the second and fourth bullet point in that Section.

<sup>3</sup> This student was originally included in the WDE's sample for the Least Restrictive Environment hypothesis. However, when the file review revealed concerns about the evaluation procedures used in this student's case, the monitoring team leader added the student to the sample for the Evaluation Procedures hypothesis.

### 3. Interviews

Following the file review, WDE monitoring team members interviewed district special education staff, general education teachers and related service providers regarding these six specific students. Through the interview process, two additional students were removed from the sample when those interviewed were able to provide compelling evidence that all areas of suspected disability had been evaluated and that the student's eligibility had been appropriately determined.

This reduction left four students remaining in the subsample. The following comments made by district staff lend further support for a finding in this area:

- While discussing evaluation and eligibility processes, a district staff member stated, "I don't want a mentally retarded label (for any student). I avoid it."
- When asked about eligibility and evaluations for a student whose cognitive abilities fall within the 2<sup>nd</sup> percentile, a district staff member said, "As [he/she] ages, we may need to look at functional programming," inferring that the student's classification was of no importance as long as certain services are in place.
- During a discussion about which areas were included in a particular student's evaluation, a district staff member said, "We didn't do an adaptive behavior assessment because we weren't looking at mental retardation." However, later in this same conversation, the team member added that assessment in that area "may have been helpful for programming."
- When asked how the evaluation team ruled out all other disability categories before determining that a student was eligible under the DD criteria, a district staff member stated, "We do have other areas of suspected disabilities but are waiting for the student to mature to do more testing."
- In discussing a particular student, a district staff member stated, "Most of the student's disability stems from behavior, not really DD. [He/She] a distractible kid." However, the student was found eligible under the SL criteria.
- When asked if there may be unanswered questions from a particular student's evaluation, a staff member explained that the student's next evaluation will focus on behaviors and academics. The interviewee went on to describe the student's current functioning as an "academic standstill" pending information from the yet unscheduled reevaluation.

### C. Finding

The WDE finds that the evaluation and eligibility determination procedures in Converse #2 are not always conducted in accordance with the requirements established in 34 C.F.R. §§300.304 and 300.306. The district will be required to address this finding and correct the noncompliance through the development and implementation of a Corrective Action Plan (CAP).

### Area 2: FAPE – Educational Benefit

#### A. Citation

§300.101 Free appropriate public education (FAPE).

*(a) General. A free appropriate public education must be available to all children residing in the State between the ages of 3 and 21, inclusive, including children with disabilities who have been suspended or expelled from school, as provided for in §300.530(d).*

*(c) Children advancing from grade to grade.*

*(1) Each State must ensure that FAPE is available to any individual child with a disability who needs special education and related services, even though the child has not failed or been retained in a course or grade, and is advancing from grade to grade.*

*(2) The determination that a child described in paragraph (a) of this section is eligible under this part, must be made on an individual basis by the group responsible within the child's LEA for making eligibility determinations.*

§300.324 Development, review, and revision of IEP.

*(b) Review and revision of IEPs—(1) General. Each public agency must ensure that, subject to paragraphs (b)(2) and (b)(3) of this section, the IEP Team—*

*(i) Reviews the child's IEP periodically, but not less than annually, to determine whether the annual goals for the child are being achieved; and*

*(ii) Revises the IEP, as appropriate, to address—*

*(A) Any lack of expected progress toward the annual goals described in §300.320(a)(2), and in the general education curriculum, if appropriate;*

*(B) The results of any reevaluation conducted under §300.303;*

*(C) Information about the child provided to, or by, the parents, as described under §300.305(a)(2);*

*(D) The child's anticipated needs; or*

*(E) Other matters.*

## **B. Evidence**

### **1. Data**

As noted above in the introduction of this report, the WDE noted that 2009 PAWS proficiency rates among students with disabilities in Converse #2 were below the overall state rates for 3<sup>rd</sup> grade reading and 8<sup>th</sup> grade mathematics. Probing deeper into the data, the WDE discovered that 36 of the district's students with disabilities at any grade level scored 'Below Basic' on two or more 2009 PAWS subtests (reading, writing, and math). The WDE hypothesized that some of these students may have IEPs that are not reasonably calculated to result in educational benefit.

### **2. File Review**

Using 18 Converse #2 students as its purposeful sample, the WDE reviewed special education files as the first step in its exploration of this hypothesis. Through the file review process, sixteen students were removed from the sample for the following reasons:

- Ten students' IEPs appeared to be reasonably calculated to result in educational benefit, and each was making adequate/expected progress.
- Five students had moved or transferred out of district.
- One student graduated.

This reduction left two students remaining from the original sample. However, through the review process for the other two hypotheses, an additional seven students were added to this sample for a total of nine students in the FAPE educational benefit subsample. Each of the remaining files exhibited one or more of the following characteristics, prompting the WDE to further examine these students' situations:



- 6 of the 9 files exhibited a “disconnect” between needs identified in assessment reports and the needs listed in the IEP. In other words, not all of the student needs identified through the evaluation process were included in these students’ IEPs.
- 2 of 9 files listed needs in the IEP which were not addressed by goals.
- 2 out of 9 files contained a program of special education and related services that did not appear to address the student’s needs and goals adequately.
- In 2 of 9 files, the students’ demonstrated a lack of progress in one or more goal areas; neither student’s file contained evidence that the IEP teams had reconvened or amended the program to address the lack of progress.
- 1 of the 9 students demonstrated completion of goals, but the file had no evidence of reconvening to change or update goals.
- 1 student’s records indicated that he/she had an ‘F’ in one or more core academic classes (mathematics, language arts, science, or social studies).
- 1 student’s records contained an attendance record showing frequent or extended absences.

### 3. Interviews

Following the file review, WDE monitoring team members interviewed district special education staff, general education teachers and related service providers regarding these nine specific students. Through the interview process, one student was removed from the subsample when those interviewed were able to provide compelling evidence that the student’s needs were in fact being adequately addressed through special education and related services.

This reduction left eight students remaining in the subsample. The following comments made by district staff lend further support for a finding in this area:

- For a student who has been failing classes since the beginning of the school year, a district staff member stated that the student’s needs are not being adequately addressed by the current IEP. He/She stated, “In the first four weeks I could tell, but, it (the IEP) was based on [prior school’s] recommendation.” The staff member continued to say that there had been discussion at parent conferences, but the IEP team had not reconvened or amended the program in any way.
- When asked if a student could benefit from counseling for social skills, a staff member stated, “[Student’s name] is not being pulled out for social skills ‘as needed’ (this is what the IEP indicated). The issue is more when [service provider] is able to do it or a staff member requests it.” Counseling services were recommended in the evaluation but not included as a service in the IEP.
- When asked about direct reading services for a certain student, a district staff member replied that intensive instruction in that area would be beneficial. He/She stated that the student “is not being pulled out for reading,” although the IEP lists specialized instruction in reading as being delivered in the Resource Room. The staff member added, “We should have had an amendment but never did.”
- When asked about a certain student’s poor progress, a service provider stated, “The student’s behavior impedes learning. At the reevaluation, we will look at behavior.” The reevaluation date was several months away at the time of the on-site visit.
- While discussing a student who had met several of his/her current IEP goals well before the annual IEP date, a district staff member stated that the student “has met the goals, and we need to look at new goals.” He/She added, “The team should reconvene to write new goals.” Regarding the same student’s situation, another district staff member added, “You would probably do an amendment, but I didn’t.”

- For a student with a speech language disability and no language services, a service provider reported that the student has “a hard time explaining and getting it out.” It was unclear how the student’s oral expression needs were being met without language services.
- When asked about the need to re-convene/amend an IEP due to a student’s lack of progress, a service provider said, “ We’ve met with teachers and parents to discuss it.” However, the team had not met or amended any part of the IEP.

### **C. Finding**

The WDE finds that special education services in CCSD #2 are not always provided in accordance with the FAPE requirements established in §§300.101 and 300.324. The district will be required to address this finding and correct the noncompliance through the development and implementation of a Corrective Action Plan (CAP).

## **Area 3: Least Restrictive Environment**

### **A. Citation**

§ 300.114 LRE requirements.

(a) (2) Each public agency must ensure that-

- (i) *To the maximum extent appropriate, children with disabilities, including children in public or private institutions or other care facilities, are educated with children who are nondisabled; and*
- (ii) *Special classes, separate schooling, or other removal of children with disabilities from the regular educational environment occurs only if the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.*

§ 300.115 Continuum of alternative placements.

(a) Each public agency must ensure that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services.

(b) The continuum required in paragraph (a) of this section must—

- 1) *Include the alternative placements listed in the definition of special education under §300.39 (instruction in regular classes, special classes, special schools, home instruction, and instruction in hospitals and institutions); and*
- 2) *Make provision for supplementary services (such as resource room or itinerant instruction) to be provided in conjunction with regular class placement.*

§300.116 Placements.

*In determining the educational placement of a child with a disability, including a preschool child with a disability, each public agency must ensure that –*

(a) *The placement decision-*

- (1) *Is made by a group of persons, including the parents, and other persons knowledgeable about the child, the meaning of the evaluation data, and the placement options; and*
- (2) *Is made in conformity with the LRE provision of this subpart, including §§300.114 through 300.118;*

(b) *The child’s placement –*

- (1) *Is determined at least annually;*
- (2) *Is based on the child’s IEP; and*
- (3) *Is as close as possible to the child’s home;*

- (c) Unless the IEP of a child with a disability requires some other arrangement; the child is educated in the school that he or she would attend if nondisabled;*
- (d) In selecting the LRE, consideration is given to any potential harmful effect on the child or on the quality of services that he or she needs; and*
- (e) A child with a disability is not removed from education in age-appropriate regular classrooms solely because of needed modifications in the general education curriculum.*

§300.117 Nonacademic settings.

*In providing or arranging for the provision of nonacademic and extracurricular services and activities, including meals, recess periods, and the services and activities set forth in §300.107, each public agency must ensure that each child with a disability participates with nondisabled children in the extracurricular services and activities to the maximum extent appropriate to the needs of that child. The public agency must ensure that each child with a disability has supplementary aids and services determined by the child's IEP Team to be appropriate and necessary for the child to participate in nonacademic settings.*

## **B. Evidence**

### **1. Data**

In reviewing the district's most recent WDE-427 data, the Department noted that Converse #2 met the target for students placed in Regular Education (RE) settings. However, the district's regular education placement rate has declined slightly over each of the past three years of available data. In addition, Converse #2 did not meet the target for students in Separate Classroom (SC) settings: 13.95% of the district's students with disabilities are served in these settings, while the comparable state rate is 8.38%. The WDE hypothesized that some Converse #2 students could be successfully educated in less restrictive settings with the use of supplementary aids and services.

### **2. File Review**

In preparation for the visit, the WDE created a sample of 36 students placed in a variety of settings within Converse #2. Once on-site in Glenrock, the WDE reviewed these 36 students' special education files in order to find out more about these IEP teams' rationale for each student's removal from the general education environment. Through the file review process, seventeen students were removed from the sample for the following reasons:

- Seven students' IEPs contained an appropriate justification for their removal from general education settings.
- Four students had moved or transferred out of the district.
- Four students returned to the regular education program after being found no longer eligible for special education.
- One student dropped out of school.
- One student's parents recently revoked their consent for special education services.

This reduction left nineteen students remaining from the original sample. Through the review process for the other two hypotheses, one additional student was added to this sample for a total of twenty students in the Least Restrictive Environment subsample. Each of the remaining files exhibited one or more of the following characteristics, prompting the WDE to further examine these students' situations:

- 11 of 20 files contain similar or identical placement justification such as “[Student name] requires small group instruction outside of general education setting.”
- All 20 files lacked evidence that the team had considered a less restrictive environment.
- 4 of the 20 files stated that behavior was a factor in the team’s placement decision: 3 of these 4 student files contained no evidence of a Functional Behavior Assessment (FBA), and 1 of these 4 files did not contain a Behavioral Intervention Plan (BIP).
- 7 of the 20 files indicated the student’s communication abilities were a factor in the placement decision.
- 2 of the 20 files contained comments by IEP team members expressing concerns that the placement might be too restrictive.
- 3 of the 20 files contained evidence of a lack of progress in the students’ current settings.

### 3. Interviews

Following the file review, WDE monitoring team members interviewed district special education staff, general education teachers and related service providers regarding these twenty specific students. Through the interview process, ten additional students were removed from the subsample when those interviewed were able to provide compelling evidence that each student’s placement was justified.

This reduction left ten students remaining in the subsample. The following comments made by district staff lend further support for a finding in this area:

- When asked to consider what supports might facilitate an increase in a particular student’s time spent in the general education classroom, a staff member commented, “[Student’s name] could do it with one-on-one support. I think it could be tried out.”
- Asked about a student’s current placement, a team member commented that the student will move to all inclusion next year because of the 7<sup>th</sup> grade curriculum.
- While discussing a student’s ability to be successful in a general education setting, a staff member noted, “I could easily see him/her entering general education.” The staff member could not explain why more general education classes were inappropriate at the present time.
- While discussing the supplementary aids and services a certain student might need in a general education class, a service provider noted, “It depends on what the teacher’s plan is on how we accommodate.”
- When asking a district staff member whether or not a particular student could spend more time in the general classroom, the staff member responded, “If [student’s name] continues to be pushed and maintains, I can see that (he/she) could exit the program.”
- When a service provider was asked if a student could be successful in more general education classes with appropriate supports, the provider replied, “If [student name] had to sink or swim, [he/she] would swim.”
- While interviewing a district staff member about another student’s ability to participate in the general education classroom, the staff member said, “With supports and services, [he/she] could be in the regular education program.”
- Asked whether a student could be successful in the general education setting, a staff member reported, “The student could hold [his/her] own given home and school support.”

### **C. Finding**

The WDE finds that special education services in CCSD #2 are not always provided in accordance with the LRE requirements established in §§300.114 through 300.117. The district will be required to address this finding and correct the noncompliance through the development and implementation of a Corrective Action Plan (CAP).

## **OTHER AREAS OF POTENTIAL NONCOMPLIANCE**

### **A. General File Review**

Each member of the WDE monitoring team also had the responsibility of conducting a procedural compliance check in each file reviewed during the on-site visit. In all, 25 files were reviewed for this purpose. In Appendix A of this report, these file review results may be found. For any file review item in which the district's compliance is below 95%, the WDE requires that the district evidence correction of the noncompliance in a Corrective Action Plan (CAP) and conduct additional self-assessment to assure full compliance in these areas. More detailed guidance is provided on the CAP form.

### **B. Parent Survey Results**

As part of the monitoring process, the WDE developed a Parent Survey in order to provide all parents an opportunity to give input on their children's special education experiences in Converse #2. The Department mailed a hard copy of the Parent Survey and a cover letter to each parent of a student currently receiving special education services in the district. Parents had the option of completing the survey on paper or completing it online. The WDE mailed a total of 94 surveys, and 30 parents returned completed surveys to the WDE (31.9%). In Appendix B of this report, the complete survey results are included for the district's review.

File Review 0502000	Number of files reviewed	Percent of files compliant
C6. In the evaluation/ reevaluation, the file documents whether the child has or continues to have a disability, the present level of academic achievement and related developmental needs of the child, whether the child continues to need special education and related services and whether additions or modifications to the special education and related services are needed. (300.305(a)(2))	46	97.83%
C9. There is documentation that the public agency provided a copy of the evaluation report and documentation of the eligibility determination to the parent. (300.306(a)(2))	46	97.83%
E. The IEP Process		
E2. The file contains a current written IEP that was completed prior to the ending date of the previous IEP.(300.323(a))	46	100.00%
E13. The IEP includes documentation if the student is being removed from general education for any part of the school day, such removal occurs only if the nature or severity of the disability is such that education in regular classes with the use of modifications, supplementary aids and services cannot be achieved satisfactorily. (300.114(a)(2)(ii))	46	56.52%
E20. The IEP includes a statement of special education and related services and any supplementary aids and services to enable the child to advance toward attaining the annual goals involved in and make progress in the general education curriculum and be educated and participate with other children with and without disabilities.	46	97.83%
E24. If the child participates in the alternate assessment the IEP contains a statement of why the child cannot participate in the regular assessment. (300.320(a)(6)(ii)(A))	46	100.00%
E26. The IEP includes the child's present levels of academic and functional performance including how the child's disability affects his/her progress in the general curriculum (or for preschool children, participation in appropriate activities). (300.320(a)(1)(i)), (300.320(a)(1)(ii))	46	78.26%
E27. The IEP includes measurable annual academic, developmental and functional goals designed to meet the needs of the child and enable the child to progress in the general curriculum. (300.320(a)(2)(i)(A)), (300.324(a)(iv))	46	82.61%
E30. The IEP includes documentation when periodic reports regarding progress toward meeting annual goals will be provided. (300.320(a)(3)(ii))	46	100.00%
E33. The IEP documents that the public agency has informed each regular education teacher, special education teacher, related service provider and other service provider who is responsible for its implementation of his or her specific responsibilities including accommodations, modifications and supports. (300.323(d)(2))	46	100.00%
E45. If the parent did not attend the IEP meeting there is documentation of more than one attempt to arrange a mutually agreed upon time, place and format. (300.322(c)), (300.322(d)), (300.328), (300.501(b))	46	100.00%

E46. The file contains documentation that the public agency conducted a meeting to develop the initial IEP within 30 calendar days of a determination that a child with a disability was found eligible for special education and related services. (300.323(c)(1))	46	100.00%
E47. The file contains prior written notice regarding the implementation of the current IEP. (§300.503)	46	93.48%
E48. The IEP documents that all of the required participants attended the IEP meeting -- parent, special education teacher of the child, general education teacher of the child, representative of the public agency (§300.321(a))	46	100.00%
F. TRANSFERS		
F1. If a child with a disability transferred from a public agency within the same academic year, and had an IEP that was in effect in Wyoming, the file contains documentation that the public agency in consultation with the parents, provided FAPE to the child including services comparable to those described in the previously held IEP. (300.323(e)), (300.501(b))	46	100.00%
F2. If a child with a disability who transferred from a public agency within the same academic year, and had an IEP that was in effect in another State, the file contains documentation that the public agency in consultation with the parents, provided FAPE to the child including services comparable to those described in the previously held IEP; until such time as the public agency conducts and evaluation, if determined to be necessary and develops a new IEP if appropriate. (300.323(f)), (300.501(b))	46	100.00%

**Continuous Improvement Focused Monitoring  
Parent Survey Results for:  
Converse County School District #2**

**Total Respondents: 30**  
**Total parents that were mailed a survey: 94**  
**Returned due to invalid address: 0**  
**Response rate = 31.9%**

	Very Strongly Disagree	Strongly Disagree	Disagree	Agree	Strongly Agree	Very Strongly Agree
1. At Individualized Education Program (IEP) meetings, we talk about whether my child needs special education services during the summer or other times when school is not in session.	10%	0%	10%	20%	33%	27%
2. My child is included in the general education classroom as much as is appropriate for his/her needs.	3%	0%	3%	23%	23%	47%
3. My child's educational needs are being adequately addressed by the school.	3%	3%	7%	20%	23%	43%
4. My child has made adequate progress over the course of the past year.	3%	7%	0%	27%	23%	40%
5. My child's special education program is preparing him/her for life after school.	3%	0%	10%	31%	17%	38%

6. Could your child's school be doing more to address his/her academic needs and improve your child's progress in school? 6a. If yes, what could the school be doing? <i>(See additional pages for responses)</i>	Yes 17%	No 62%	Don't Know 21%
7. Are there additional supports, services, or equipment that would enable your child to spend more time in the regular classroom? 7a. If yes, please describe? <i>(No additional comments received)</i>	Yes 3%	No 73%	Don't Know 23%
8. Did your child's school conduct testing in every area in which he/she might have needs that could be addressed through Special Education services? 8a. If no, what areas were not included in the testing? <i>(No additional comments received)</i>	Yes 60%	No 23%	Don't Know 17%

	Very Strongly Disagree	Strongly Disagree	Disagree	Agree	Strongly Agree	Very Strongly Agree
9. My child's school provides me with information about organizations that offer support for parents of students with disabilities.	7%	7%	10%	43%	13%	20%
10. Teachers at my child's school are available to speak with me.	3%	0%	3%	27%	20%	47%
11. Teachers and administrators encourage me to participate in the decision-making process.	3%	3%	7%	28%	10%	48%
12. My child's school gives parents the help they may need to play an active role in their child's education.	3%	0%	0%	40%	13%	43%
13. My child's school explains what options parents have if they disagree with a decision of the school.	3%	7%	3%	30%	23%	33%

14. Any other comments that you would like to share?  
*See additional pages for responses*



**Continuous Improvement Focused Monitoring  
Parent Survey Open-Ended Comments  
Converse County School District #2**

6. Could your child's school be doing more to address his/her academic needs and improve your child's progress in school?

6a. If yes, what could the school be doing?

- Get a capable teacher
- Make adjustments – she is still failing classes
- My child never tells me so he doesn't have to do the work- when a big test or assignment or report is coming up send a note home or call me
- They are going above and beyond to ensure my child's progress is improved
- They could be putting him in classes more of the level he needs to be i.e. math

14. Any other comments that you would like to share?

- Can't understand why [REDACTED] is failing test and not getting assignments in when there are people to help
- Grant Elementary is doing a great job with my child
- I really appreciate the teachers hard work- this is an excellent school
- Love the basic teaching
- They don't push the kids hard when young-thanks
- [REDACTED] may be very good- not a special ed teacher
- They are doing a poor job this year in taking care of the children
- My son is doing well in his classes
- I am pleased with the staff and with his study growth
- Since my son started school in converse county- his grades improved and he feels more comfortable in our community
- I am extremely pleased with the changes
- Yes my daughter need more PT a week than she is getting and more aids like [REDACTED]
- My son has made great improvement since moving to Converse County
- I am very pleased

Respondent Demographics  
Converse County School District #2

Percent of parent respondents who said their child is:

<b>Ethnicity</b>	<b>N</b>	<b>%</b>
Hispanic	2	7%
American Indian/Alaskan Native	1	3%
White	27	90%

<b>Primary Disability Code</b>	<b>N</b>	<b>%</b>
Autism	2	7%
Developmental Delay	2	7%
Multiple Disabilities	1	3%
Specific Learning Disability	7	23%
Speech/Language Impairment	12	40%
Other Health Impairment	5	17%
Hearing Impaired (including Deafness)	1	3%

<b>Grade Distribution</b>	<b>N</b>	<b>%</b>
Kindergarten	5	17%
Grades 1-6	14	46%
Grades 7-8	4	13%
Grades 9-12	7	23%

<b>Environment Code</b>	<b>N</b>	<b>%</b>
Regular Environment	18	60%
Resource Room	9	30%
Separate Classroom	3	11%