



Opportunity Through Education

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# **Individuals with Disabilities Education Act Results Driven Accountability Verification Monitoring Report for Natrona County School District #1**

**Monitoring Dates: September 12, 2023 through October 5, 2023**  
**Report Date: 12/29/23**

**Report Created by: Wyoming Department of Education,  
Special Education Programs Division**

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## **Introduction**

In accordance with 34 CFR § 300.600, the Wyoming Department of Education (WDE) is required to monitor and enforce the requirements of the Individuals with Disabilities Education Act (IDEA). The focus of this monitoring process is to promote systems change that will positively influence educational results and functional outcomes for students with disabilities. This report reflects the findings as the result of a verification monitoring of Natrona County School District #1 (Natrona 1).

## **District Selection**

During the 2020 - 2021 school year, Natrona 1 was selected for Results Driven Accountability (RDA) Monitoring.

The original monitoring occurred from September 14, 2020, through September 21, 2020. At that time, Natrona 1 was found to be non-compliant in areas of evaluation and eligibility, IEP goals, and determining the least restrictive environment. A Corrective Action Plan (CAP) went into effect on February 11, 2021. At that time, the District agreed to begin working toward systemic changes and the correction of these finding areas.

The WDE conducted the first verification on October 18 through November 19, 2021. The WDE found that Natrona 1 continued to be non-compliant in the identification of individual needs, IEP goals, and determination of the least restrictive environment. A Compliance Agreement went into effect on January 24, 2022.

The WDE conducted a verification monitoring during which it reviewed 70 student files, 4 files were removed, 7 files were removed due to the student graduating, 3 students were no longer IDEA eligible, 5 students transferred out, 1 student moved to homeschool, and 2 students dropped out. The WDE conducted interviews with district staff and administrators, observed students in classrooms, and reviewed other documentation provided by Natrona 1 from September 11, 2023, through Oct 5, 2023.

## **Systemic Noncompliance Requiring Verification:**

### **Area 1: Identification and Addressing of Individual Needs.**

#### **Citation:**

#### **§ 300.320 Definition of individualized education program.**

- (a) *General.* As used in this part, the term individualized education program or IEP means a written statement for each child with a disability that is developed, reviewed, and revised in a meeting in accordance with §§ 300.320 through 300.324, and that must include -
  - (1) A statement of the child's present levels of academic achievement and functional performance, including -

- (i) How the child's disability affects the child's involvement and progress in the general education curriculum (i.e., the same curriculum as for nondisabled children); or
- (ii) For preschool children, as appropriate, how the disability affects the child's participation in appropriate activities;

**Evidence:** WDE reviewed 52 files, conducted interviews, and conducted on-site observations. 25 files were non-compliant for identifying and addressing student needs. The district is still using a template for PLAAFPs. These generic PLAAFPs are not individualized to student needs and often lack skill deficits that inform student needs. The PLAAFP serves as a map for the IEP, indicating the areas in which goals and services are needed, and serves as a reference point upon which to measure student progress through the implementation of the IEP. While a template may be used, it should only provide a framework for the PLAAFP, not a cut-and-paste of options. Failure to write a descriptive PLAAFP with quantifiable data makes developing an IEP that is reasonably calculated to meet the student's needs in light of their individual circumstances difficult. This lack of specificity in identifying skill deficits is likely contributing to concerns with developing goals that are specific and individualized to student needs. Some examples are:

- Student F: There is a statement in the LRE section about the student being truant; there is no mention of this in the PLAAFP. A student's truancy should be discussed by the team to ensure that the student does not have possible unmet needs that are leading to the truancy.
- Student D: This student had excessive tardies, in-school and out-of-school suspension however, behavior is not addressed in the IEP. The Parent has concerns regarding Autism needs and is seeking further assessment. There is no evidence that the team considered this or pursued any action in the evaluation considering this area of need. The student's PLAAFP lacks identification of skill deficits.

**Conclusion:** WDE finds that Natrona County School District #1 remains out of compliance with the identification and addressing of student need.

## **Area #2: IEP Goals**

### **Citation:**

#### **§ 300.320 Definition of individualized education program.**

- (a) *General.* As used in this part, the term individualized education program or IEP means a written statement for each child with a disability that is developed, reviewed, and revised in a meeting in accordance with §§ 300.320 through 300.324, and that must include -
  - (1) A statement of the child's present levels of academic achievement and functional performance, including -
    - (i) How the child's disability affects the child's involvement and progress in

the general education curriculum (i.e., the same curriculum as for nondisabled children); or

(ii) For preschool children, as appropriate, how the disability affects the child's participation in appropriate activities;

(2)

(i) A statement of measurable annual goals, including academic and functional goals designed to—

(A) Meet the child's needs that result from the child's disability to enable the child to be involved in and make progress in the general education curriculum; and

B) Meet each of the child's other educational needs that result from the child's disability;

(ii) For children with disabilities who take alternate assessments aligned to alternate academic achievement standards, a description of benchmarks or short-term objectives;

**Evidence:** WDE reviewed 52 files, conducted interviews, and conducted on-site observations. 26 files were non-compliant in the area of goal development. IEP teams continue to develop goals that fail to identify targets and specific skill deficits. This creates unmeasurable goals. When an IEP lacks measurable goals, it prevents teams from measuring progress and ensuring the student is receiving educational benefit. Student goals commonly have a target of 80%. When the goals of multiple students in a school have a common target, it is clear that teams are not setting targets that are unique to the student's needs in light of their unique circumstances. WDE will acknowledge there has been improvement in this area and the district should focus efforts on those schools where there is an ongoing lack of understanding.

Some examples are:

- Student A: The student's goals are not measurable. One of the goals uses a vague target that the student will use coping skills to avoid engaging in unpredictable behavior. The team is unable to measure this goal as it does not state what the coping skills are or what the unpredictable behavior is. The student then has two goals that measure the same skill of using a break card.
- Student B: The student's goals are not measurable. The student's social work goal names the target as “age appropriate relationship skill.” This skill is not defined anywhere and would be impossible for team members to measure. The reading goal is not measurable due to the wording that the student increases their reading level from a 1.4 to a 2.6. It is unclear what these levels refer to and how anyone would measure this growth.

**Conclusion:** WDE finds that Natrona County School District #1 remains out of compliance. Natrona should work with the WDE to identify specific schools in need of improvement of goals and focus work on those schools.

### Area #3: Area 3: Least Restrictive Environment (LRE)

#### Citation: § 300.114 LRE requirements.

##### (a) General.

- (1) Except as provided in § 300.324(d)(2) (regarding children with disabilities in adult prisons), the State must have in effect policies and procedures to ensure that public agencies in the State meet the LRE requirements of this section and §§ 300.115 through 300.120.
- (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.

**Evidence:** WDE reviewed 52 files, conducted interviews, and made on-site observations of 3 elementary schools, 1 middle school, and 2 high schools. Of the files reviewed, 21 were found to be non-compliant with the LRE mandate. The 21 identified files did not have a clear justification as to the identified needs that would require the student to be placed in a restrictive setting. While the LRE statement indicated what skills the student would need to move to a lesser restrictive setting, it was not always clear that was the focus of the IEP. There was a concern that the rigor and standards for the students in these highly restrictive settings were not appropriate to the individual needs of the students. Consideration should be made annually with a continual focus on moving a student to a setting that allows them the maximum access to the general education and typical peers per the mandate. There was an attempt by the district to create pilot programs in certain BASE classrooms with a focus on the students being a part of their general education setting within the school. It appears these pilots have had a positive impact on the students in regards to their LRE.

Some schools continue to use a template to document these discussions that does not clearly state why the student is removed from the general education environment but is rather a scripted response. It is unclear if LRE discussions are taking place during the IEP development.

**Conclusion:** WDE finds that Natrona County School District #1 remains out of compliance. The district should work with WDE to identify the specific schools in need of improvement in the development of LRE statements.

#### Individual Findings of Noncompliance:

	Findings of Noncompliance
34 CFR 300.34 34 CFR 300.113	This student has vision and hearing concerns that are not addressed in the evaluations as well as not having support in the IEP related to these concerns. The team simply put a statement in that hearing does not affect the student's

	education with no formal or informal assessment data. The student's vision was not discussed at all by the team on how it could be affecting the student's education.
34 CFR 300.305 34 CFR 300.320	This student is in an intensive life skills (ILS) program and only receives specially designed instruction in academics for 15 minutes three times a week. There is not a clear accounting of how the rest of the student's day is spent. The student receives FLS minutes, but is unclear what is being provided during that time. The evaluation did not address the academic needs of the student either through standard or curriculum-based measures. It is unclear how 15 minutes three times a week would result in educational benefit.

The WDE would like to acknowledge while Natrona 1 continues with systemic noncompliance in these areas, there has been a noticeable improvement in some schools. The district should be recognized for its commitment to improving outcomes for the students in the highly restrictive settings.

If you have any questions concerning this report, please contact Sheila Thomalla at [sheila.thomalla2@wyo.gov](mailto:sheila.thomalla2@wyo.gov).

c: Michael Jennings, Superintendent, Natrona County School District #1  
Margee Robertson, Special Education Programs Director, WDE